

Summary of Items Discussed in 1/2019 APSEC Discussion Forum on 18 January 2019

	Items proposed by Convenors for Discussion	Summary of Discussion and BD's Responses
	Items raised by HKIA	
1.	<p><u>Provision of Temporary Refuge Space (TRS)</u></p> <p>Clause B29.1(a) of the Fire Safety Code 2011 stipulates that provisions of MOE for persons with a disability (i.e. provision of TRS) do not apply to a building or parts of a building exempted from the application of Obligatory Design Requirements in the DMBFA 2008; whereas paragraph 2.1.2(a) of the DMBFA 2008 stipulates that for certain categories of buildings, the means of access and facilities stipulated in the Mandatory Section shall be provided to the extent as specified in the right column of Table 1.</p> <p>Based on the above, we opine that the provision of TRS shall not be applicable to those areas of buildings which are outside the extent of application as described in Table 1 of DMBFA 2008, despite that these areas are not categorised under paragraph 2.2 “Exemptions” of DMBFA 2008. For instance, TRS should not be applicable to the common areas at typical floors above ground storey of a domestic building which does not exceed four (4) storeys.</p> <p>Please advise if our interpretation is correct.</p>	<p>BD advised that HKIA’s interpretation regarding TRS provision in common areas at typical floors above ground storey of a domestic building not exceeding four storeys was correct.</p>

2.	<p><u>Deferring Submission of Minor Amendments for Ground Investigation Works within Scheduled Areas</u></p> <p>Paragraph 18 of PNAP ADM-19 states that subject to a modification of regulation 33(1) of the B(A)R being granted by the BA under section 42(1) of the BO, prior approval and consent to the minor amendments of building, superstructure and drainage works, for which the first consent has already been given, would not be required except for the amendments described in Appendix G.</p> <p>We would like to enquire if the aforesaid modification could also be applied to Ground Investigation Works within Scheduled Areas, which is NOT listed as an unqualified item in Appendix G of the said PNAP, provided that the approved method statements are to be strictly followed.</p>	<p>BD advised that paragraph 18 of PNAP ADM-19 regarding deferring submission of minor amendments was NOT applicable to Ground Investigation Works within Scheduled Areas since it normally involves complex ground condition, major underground utilities or existing railway facilities, etc. Referral to other government departments for comments would always be necessary prior to the commencement of works.</p>
<p>Items raised by HKIE</p>		
3.	<p><u>Technical Difficulties in Providing Underground Car Parks</u></p> <p>Paragraph 5 of Appendix C of PNAP APP-2 concerning “Technical Difficulties in Providing Underground Car Parks” mentioned that “Above ground private car parks may be 100% disregarded from GFA calculation if it is proven with sufficient evidence that it is technically infeasible to construct an underground car park due to specific site constraints. Examples of such site constraints include sites located above major underground utilities, within Areas Number 1, 2, 3 or 4 in Schedule 5 of the BO or with other complex geotechnical constraints.”</p>	<p>BD advised that whether above ground private car parks could be 100% disregarded from GFA calculation due to specific site constraints would be considered on case merits. For projects within railway protection area, technical evidence of infeasibility to construct underground car parks might be submitted to BD for consideration.</p> <p>BD also advised that the principle of PNAP APP-137 was applicable to railway and related structures and the requirements in PNAP APP-24 would</p>

	<p>Meanwhile, PNAP APP-24 cites that site formation/foundation works shall not induce total movement in any railway structures/installations exceeding 20mm in any plane without any way forward. It is technically infeasible to design and construct deep basement right next to some railway structures especially those on-ground Light Rail with such stringent movement control.</p> <p>As such, will BD consider the above as site constraint such that the concerned above ground private car parks may be 100% disregarded from GFA calculation? Meanwhile, will the requirements of PNAP APP-24 also be reviewed in accordance with the spirit of PNAP APP-137? It is noted that the control limit in PNAP APP-24 was relaxed for some MTR related projects but none for other private development projects.</p>	<p>be reviewed with MTRCL.</p>
<p>4.</p>	<p><u>Monitoring of Ground-borne Vibrations and Ground Settlements</u></p> <p>3As (i.e. Alert/Alarm/Action) levels are proposed as monitoring for ground-borne vibrations and settlements arising from pile driving or similar operations in accordance with PNAP APP-137. When the monitoring data reach Alarm level, RSC shall notify AP/RSE/RGE and implement necessary remedial/mitigation measures in accordance with the agreed action plan. RSE/RGE will review the method statement of piling and ELS works for necessary modification. BD and relevant parties shall also be notified.</p>	<p>BD advised that while the RSC should report to the AP/RSE/RGE when the monitoring data reached the Alert level, BD might request AP/RSE/RGE to provide information of individual cases to facilitate the investigation of defects in adjoining buildings or complaints due to the works.</p>

	Do AP/RSE/RGE need to submit an Investigation Report when the monitoring data reach Alert Level?	
Item raised by HKIS		
5.	<p><u>Vertical Lifting Platforms</u></p> <p>The use of Vertical Lifting Platforms (VLP) to meet BFA requirements has been discussed in previous Discussion Forums and it was concluded that the use of VLP in new buildings would be limited to those with insurmountable difficulties in providing accessible ramps or lifts (Item 24 of ADF 5/2016 refers). However, in light of the recent concern on design flexibility, we would like to ask BD reconsidering the use of VLP as an acceptable provision for complying with regulation 72 of B(P)R.</p> <p>Meanwhile, it is also doubtful to interpret “Ramp” as a vertical transportation in paragraph 5.5 A(a) in Chapter 5 of DMBFA 2008 for VLP, and therefore, insisting “Ramp” must be provided as a priority preference is unfair. VLP should be considered as a reasonable alternative.</p> <p>We would invite BD to re-consider the following:</p> <p>(i) either Ramp, Lift or VLP could be considered as an acceptable provision for overcoming changes in level by persons with a disability. DMBFA 2008 does not in anyway indicate any preference of Ramp to Lift or Lifting Platform noting that it only says “Ramps of an appropriate design shall be provided at all changes in level other than those served by an accessible lift or</p>	<p>BD advised that the Technical Committee (TC) on DMBFA had previously discussed the use of VLP and considered that a self-operated VLP should be considered as a reasonable alternative for vertical circulation for wheelchair users where it was impractical to provide a passenger lift or a ramp. In light of practitioners’ concern, more information might be provided for further consideration by the TC on DMBFA if necessary.</p> <p><i>[Post Meeting Notes: Arising from the above discussion, the TC on DMBFA had discussed again the use of VLP on 19.2.2019. It was re-affirmed that VLP could only be considered if it was impractical to provide a passenger lift or a ramp.]</i></p>

	<p>accessible lifting mechanism...". Paragraph 14 in Division 5 of Chapter 4 of DMBFA 2008 refers.</p> <p>(ii) While paragraph A(a) in Division 19 of Chapter 4 of DMBFA 2008 states that lifts are the most convenient form of vertical access, paragraph 5.5 A(a) in Chapter 5 states that Vertical Lifting Platform is necessary if no other means of vertical transportation is available.</p> <p>(iii) Lengthy ramps due to great level difference may prejudice design flexibility and the long travel and climbing height may not be welcomed by wheelchair users and is not a better solution than VLP.</p> <p>(iv) VLP has been widely accepted as a reasonable alternative for vertical circulation in existing buildings.</p>	
<p>Item raised by AAP</p>		
<p>6.</p>	<p><u>Carpark GFA Exemption</u></p> <p>Reference is made to the extreme weather and severe typhoons that had attacked HK recently. Flooding and severe damages at developments either completed or under construction at the coastal and low-lying areas were reported.</p> <p>In accordance with PNAP APP-2, underground and above ground carparks</p>	<p>BD advised that the current policy of disregarding underground car park from GFA calculation and the SBD Guidelines were two distinct measures arising from the recommendations of Sustainable Development Council to foster a quality and sustainable built environment. Therefore, complying with SBD Guidelines should not direct imply that the building bulk of above ground carpark could be disregarded.</p>

	<p>may be 100% and 50% disregarded from GFA calculation respectively. We understand that building bulk was one of the considerations in formulating the above principle. However, underground car parks are most susceptible to flooding / damages caused by extreme weather or super typhoons which are anticipated to be getting only more frequent in the future. Besides, there are also other means to control the building bulk, e.g. SBD Guidelines under PNAP APP-152 and building height limit under lease or OZP.</p> <p>In this regard, we suggest BD to consider allowing carpark to be 100% GFA exempted even if it is above ground, if the following conditions are satisfied:</p> <ul style="list-style-type: none"> (i) SBD Guidelines under PNAP APP-152 is complied with; and (ii) There is a height limit control under lease or under OZP for the development. <p>This flexibility will enable building professionals to recommend the most sensible design for developments to the owners based on technical and scientific considerations.</p>	<p>Nevertheless, whether above ground private car parks could be 100% disregarded from GFA calculation due to specific site constraints would be considered on case merits in accordance with Appendix C of PNAP APP-2.</p>
AOB Items		
7.	<p><u>Second Set of Submission Plan</u> (Item raised by HKIA)</p> <p>Pursuant to item 8 of ADF 3/2016 held on 27 May 2016, BD might consider accepting colour duplication of the hand-amended Set I plans as</p>	<p>BD advised that such streamlined practice had already been accepted and established, and based on item 12 of ADF 2/2017 held on 17 March 2017,</p>

<p>Set Ia plans for approval. While we noticed that the said arrangement might not be accepted in some occasions, we would like to clarify whether such arrangement has already been established as a standard practice.</p>	<p>the following statement for certifying Set Ia plans (coloured duplication of Set I) as true copy of Set I was to be endorsed by AP/RSE (as the case may be) as follows:</p> <p>“I hereby certify this drawing is a true copy of its original.”</p> <p><i>[Post Meeting Notes: BD confirmed that the practice of accepting colour photocopy of hand-amended Set I plans (with certification by AP/RSE) to be the Set II plans (or known as Set Ia plans) has been adopted by NBD1 since ADF 3/2016 and well received by practitioners.</i></p> <p><i>While it was noted that the arrangement was not prevailing for structural submissions, BD had reviewed the reasons why the practice was not well received. A survey was conducted recently to seek opinions from frontline staff and it was revealed that most of the SEs welcome the proposal. They would be willing to make such arrangement if request was received from RSE. However, no record of such request from RSE was received in the past 3 years. It was envisaged that the reasons of unpopular of the practice might be as follows:</i></p> <ul style="list-style-type: none"> <i>(i) It might be environmentally unfriendly for making photo copy of a large amount of plans.</i> <i>(ii) Submission of replacement plans/supplementary plans was allowed and it might be considered as a better option.</i> <i>(iii) For certain types of plans, such as superstructure plans, amendments were normally only required on a few number of plans.</i> <i>(iv) RSE might have difficulty to make AI/AO copy in a short period of</i>
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		<p><i>time.</i></p> <p>(v) <i>RSE might need to allow additional time for colour copying.]</i></p>
<p>8.</p>	<p><u>Discrepancy in Presentation of Site Area/Dimensions</u> (Item raised by HKIA)</p> <p>Pursuant to paragraph 9 of PNAP ADM-21, the decimal place on the presentation of site areas computed in accordance with the Code of Practice issued under the Land Survey Ordinance (Cap. 473) (Code) would be adopted by BD for the purpose of GBP. Under the Code, lot (constituting the site) co-ordinates and dimensions should be recorded and shown on plans to 0.001 of a metre and the areas shall be rounded off (5 up 4 down) to the nearest 0.1m² for area under 2,000m² and to the nearest 1m² for area of 2,000m² and above.</p> <p>While we noticed that there were cases of which discrepancy was raised by BD in converting the dimensions from “inch” to “metre”, we would like to clarify if the practice could be aligned.</p>	<p>BD noted the discrepancy due to unit conversion and would further advise after checking with their Drawing Office.</p> <p><i>[Post Meeting Notes: BD confirmed that there was no change in the policy on the subject matter and paragraph 9 of PNAP ADM-21 should be followed.]</i></p>
<p>9.</p>	<p><u>Non-recognised Type of Pile Foundation</u> (Item raised by HKIE)</p> <p>Pursuant to paragraph 3 of PNAP APP-18, where it is proposed to use a piling system, which is not a recognised type, the RSE is advised to prove its acceptability to the BA before detailed piling plans are submitted for approval. We would like to ask if BD could consider processing the</p>	<p>BD advised that paragraph 3 of PNAP APP-18 provided a recommendation on the approval process and it was not a prerequisite requirement for the approval of foundation plans. BD would consider the non-recognised type of pile proposal on case-by-case basis and there were precedent cases that</p>

	<p>submission of trial piles and working piles concurrently so that the approval process could be streamlined.</p>	<p>BD had approved both trial piles and working piles concurrently. If the trial piles and working piles were approved concurrently, it was the normal practice that the consent for working piles be not granted until the assessment/review report for the trial piles was submitted and found satisfactory.</p>
<p>10.</p>	<p><u>Submission of Documents before Certification of Completion of Works</u> (Item raised by HKIE)</p> <p>Pursuant to item 6 of ADF 4/2018 held on 17 August 2018, BD advised that measures to facilitate and streamline the processing of Form BA13/14 submission had been implemented. We would like to enquire the status, in particular, the issue of reminder with sample checklists upon completion of the structural works for timely submission of the required technical documents prior to Form BA13/14 submission. Meanwhile, we would also like to suggest a separate Form BA14 for the completed structural works might be submitted upon its completion for early processing.</p>	<p>BD advised that a standard advisory letter with sample checklist to be completed by AP/RSE would be available for use shortly.</p> <p>Meanwhile, BD would study the feasibility of the submission of separate Form BA14 for structural works to facilitate early processing of submission.</p>
<p>11.</p>	<p><u>Clear Space at Foot of Accessible Ramp</u> (Item raised by AAP)</p> <p>Pursuant to paragraph 16 in Division 5 of Chapter 4 of DMBFA 2008, a clear space of not less than 1500mm x 1500mm shall be provided at the head and foot of every ramp. As regards a G/F entrance ramp abutting a public pavement, we would like to clarify whether a clear space within the development of not less than 1500mm in width and 900mm in depth (i.e.</p>	<p>BD would review and further advise.</p> <p><i>[Post Meeting Notes: BD confirmed that, for G/F entrance ramp abutting a public pavement, the provision of the 1500mm x 1500mm clear space at the foot of the ramp wholly within the curtilage of the development was not</i></p>

600mm for tactile warning strip and 300mm for horizontal extension of the handrails) would be required at the foot of the ramp. A sketch is provided below for reference.



required provided that such clearance space would be available in the pavement for direct entry to and exit from the building. Notwithstanding this, a clear space within the development of not less than 900mm in depth, i.e. 600mm for tactile warning strip and 300mm for horizontal extension of the handrails as shown in Figures 7 and 16A of the DMBFA 2008 respectively, was still required to be provided at the foot of the ramp.]

12. **Submission in Electronic Format**
(Item raised by BD)

To promote green environment and facilitate processing of submission, BD would encourage paperless submission in electronic format as an alternative to the conventional paper format. To this end, BD was developing an Electronic Submission Hub (ESH) to receive and handle submissions in electronic format under the Buildings Ordinance which would be implemented in the first quarter of 2022 tentatively. Meanwhile, to prepare for and get familiar with submission in electronic format,

Members appreciated the effort of the Government in promoting electronic submission and were keen to see the development of the ESH. As a trial, Members suggested that submission of documents other than plans in electronic format might be considered. BD would study the feasibility and follow up accordingly.

	<p>practitioners were encouraged to make their submissions in electronic format on a voluntary basis. Apart from the Part II structural calculations referred in PNAP ADM-8, BD would also accept other submissions in electronic format and reference should be made to PNAP ADM-17 for more details.</p>	
<p>13.</p>	<p><u>Testing Requirements on Bond Properties of Steel Reinforcing Bars</u> (Item raised by BD)</p> <p>Further to BD's circular letter dated 31 October 2018, BD reminded that the grace period in respect of waiving the requirement of purchaser's test on bond properties of steel reinforcing bars had already expired on 31 December 2018. For the avoidance of doubt, purchaser's test on bond properties would not be required for steel reinforcing bars delivered on site on or before 31 December 2018.</p>	<p>Members acknowledged the arrangement and would follow the requirement accordingly.</p>