Summary of Items Discussed in 2/2019 APSEC Discussion Forum on 22 March 2019

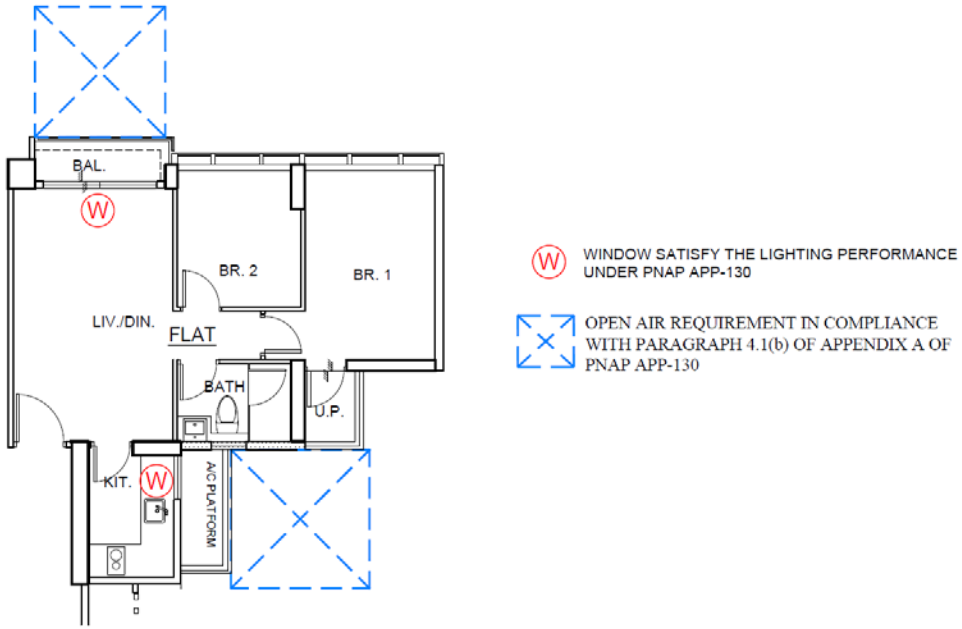
	Items proposed by Convenors for Discussion	Summary of Discussion and BD's Responses
	Items raised by HKIA	
1.	**<u>Structural Supports for Building Services Installations relating to Licence Application</u>** Upon licence application, "structural justifications" are used to be submitted to the Licensing Authority to demonstrate that structural supports from ceiling for building services equipment (such as AHU) which are heavier than 100kg are structurally safe. However, the Licensing Authority requires recently that approval and consent from BA should be obtained for such works and a copy of BD's acknowledgement letter on Form BA14 should be provided upon its completion. Apparently, the above requirement cannot be acceded to, as such works, if already completed at the time of OP inspection and followed by BD's issuance of OP, cannot be retrospectively submitted for BD's approval. It has always been our industry stakeholders' understanding that approval and consent for such works are not required, and "structural justifications" shall suffice. Please advise if this understanding is correct. If affirmative, we would appreciate if BD could clarify with the relevant parties (e.g. BD's Licensing Unit and respective Licensing Authorities) that formal BD's approval and consent for such works is not required prior to licence application. The	BD advised that the practice of (i) submission of "structural justifications" for structural supports suspended from ceiling slab for building services equipment heavier than 100kg; and (ii) supervision of the erection by AP/RSE in their capacity registered under the BO in the licence application would be maintained for the time being prior to the implementation of a new control regime. Relevant stakeholders would be consulted before implementation in due course. Relevant frontline officers had also been notified of such arrangement.

	AP and/or RSE and/or RC may however, upon the Licensing Authority's request, submit a written confirmation that (i) such works have been completed under their supervision as part of the new building works upon OP application, and (ii) such completed installation works are structurally safe.	
2.	**AC Platform in front of Curtain Wall** Please advise if the "Guidelines for Design and Safety Provisions for the ACs Platforms" appended to BD's Circular Letter dated 23.12.2016 and the amendments provided in Item 4 of ADF 4/2018 and Item 4 of ADF 5/2018 are also fully applicable to the design and disposition of AC Platform in front of curtain wall.	BD advised that the Guidelines were also applicable to the design and disposition of AC Platform in front of curtain wall.
3.	**Structural Submission for Vertical Greening** The Circular Letter issued by BD on 14.2.2019 clarifying the structural submission requirements for vertical greening refers. As there is no mentioning of the effective date for implementation of the relevant requirements, we would suggest that the said Circular Letter will NOT be applicable to new building proposal or its major revision of which superstructure consent has already been issued as at the date of the Circular Letter, in order to avoid causing any undue impact on ongoing development projects especially for those which are approaching OP application.	BD confirmed that the new structural submission requirements would not be applicable to building projects with consent to commencement of superstructure works granted before 14.2.2019.

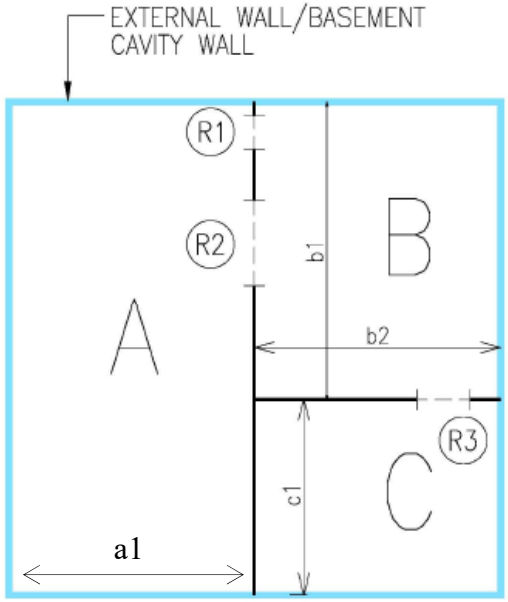
4.	**Post-OP Rectification Works Procedures ("PRWP")** The Circular Letter issued by BD on 9.1.2014 regarding the captioned stipulated that the scope of rectification works to be carried out under the PRWP only involved the building works shown on the latest approved plans. Based on the above, we understand that the scope of PRWP will also cover those rectification works which cannot be carried out under the simplified requirements of MWCS, such as rectification of external cladding which is >6m from adjoining ground, rectification of fixed glazing or spandrel glass of curtain wall, etc., provided that these works are shown on the latest approved plans. Please advise if our understanding is correct.	BD would review and advise in due course.
5.	**Installation of Sanitary Fitments/Fittings after OP** As stated in PNAP APP-114, BD will favourably consider to give a modification of B(SSFPDW&L)R to permit the installation of sanitary fitments and fittings after the issue of OP under certain circumstances/conditions for the purpose of waste minimisation. Whilst we fully support the said arrangement, we reckon that paragraph 3(b) of the PNAP stating "*a developer has offered to provide fittings to individual purchaser's choices*" should not be a pre-requisite for the granting of such modification. Very often, refined fitting-out works of bathrooms will only be carried out after OP, and if the sanitary fitments/fittings are in place at the time of OP application, quite substantial abortive works (including damages to the installed sanitary fitments/fittings) will inadvertently be incurred at the course of subsequent fitting-out works. Indeed, quite a	BD reiterated that basic sanitary fitments required under the building regulations should be installed prior to the issue of an OP. Arising from reports of sanitary fitments and other fixtures/fitting in new buildings being discarded upon occupation, for the purpose of waste reduction, BD had been adopting a pragmatic approach to favourably consider giving modification of B(SSFPDW&L)R in the two circumstances as mentioned in paragraph 3(a) and (b) of PNAP APP-114. Damage/loss due to later-on fitting out works which could be avoided through proper site management/protection would not be considered as a strong justification for such.

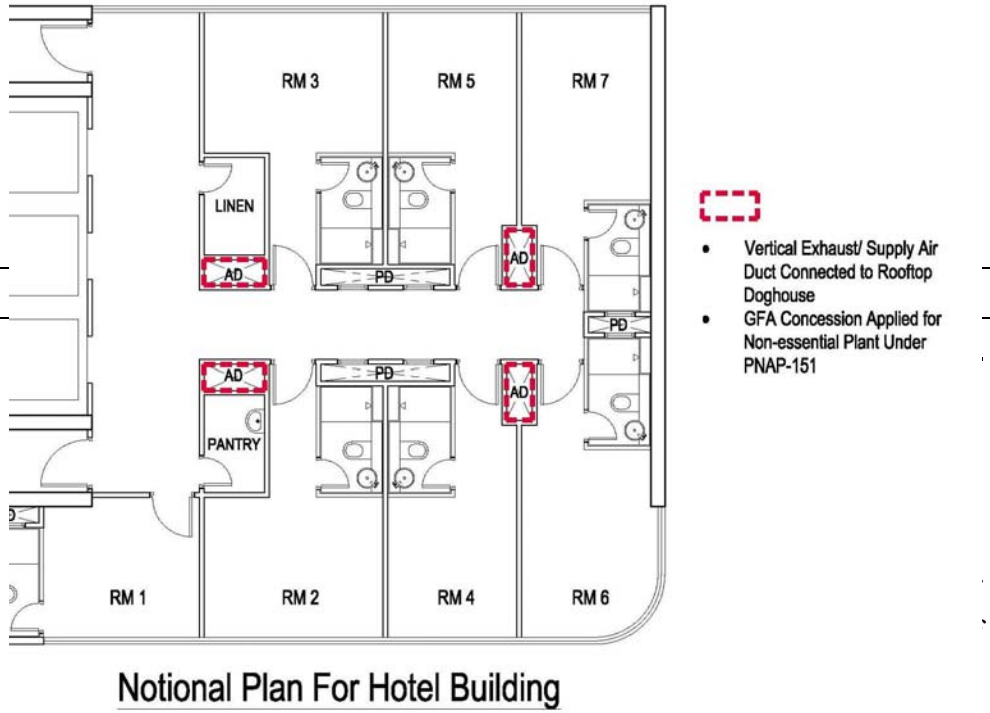
	number of past projects have been granted with such modification without the need to fulfil paragraph 3(b) of the PNAP, whereas some others were not. We would therefore be obliged to have your advice that paragraph 3(b) of the PNAP is indeed not a pre-requisite for the granting of such a modification with the primary purpose of waste minimisation, and this should similarly be applicable to other building elements such as non-FRR doors.	
	Items raised by HKIE	
6.	**<u>Adoption of 3As System in Footing Submission</u>** As required in paragraph 4(k) of PNAP APP-18, details of monitoring requirements for ground movement in adjacent and nearby buildings, structures, lands, streets and services arising from the proposed piling works should be included in the pile foundation submission for approval. AP/RSE/RGE may adopt the 3As system in their piling and ELS submissions for BD's consideration. Do we need to adopt this 3As system in footing submission, which aims to approve bearing capacity of supporting stratum and the structural design of footings?	According to Clause 7.2.3 of Code of Practice for Foundations 2017, where the construction of a foundation might affect any building, structure, land, street or services, a monitoring plan should be provided. For simplicity, cross-referencing to the monitoring system as detailed in the monitoring plan given in the corresponding ELS submission was acceptable.

7.	**Details of Demountable Panels covering External Drainage Pipes** As required in paragraph 4.1 in Annex 1 of Appendix B to PNAP APP-93 on Planning and Design of Drainage Works, details of the demountable panel of the architectural feature enclosing the external drainage pipes shall be included in structural plans of the architectural feature for approval. While there might be occasions that such details were not required on the structural plans, we would like to know if there is any change in such requirement.	BD advised that the fixing details of the demountable panel of architectural features enclosing external drainage pipes should be included in the structural plans for approval. Nevertheless, provision of safety chain having sufficient capacity to hold the panel should be shown on the structural plans for information only.
8.	**Witnessing of Loading Test for Foundation Works** Would BD please advise the status of trial run of appointing an independent HOKLAS laboratory for pile loading test with surprise check by BD to replace current loading test arrangement.	BD advised that frontline officers would be flexibly deployed to assist each other team in witnessing loading test for foundation works. Should arrangement could not be made timely, trial on HKIE's proposed arrangement would be considered on case-by-case basis and RSE might liaise with the respective case officer as necessary.
9.	**Submission Checklist for Certification of Completion of Works** To facilitate and streamline the processing of Form BA13 and Form BA14 submission, it is suggested to work out a standard submission checklist for various types of works with BD.	BD advised that a standard letter with a table summarising the required documentary submissions imposed under the approval conditions would be issued when the superstructure works were nearly completed. RSE should monitor to ensure the required submissions would be timely made before the application for OP.

	Item raised by AAP	
10.	**PNAP APP-130** Paragraph 4.1(b) of Appendix A to PNAP APP-130 states that when a window can satisfy the UVA criteria (Diagram F), this window is considered to have met the performance standard of ventilation if, among others, the window faces into a clear and unobstructed area complying with at least the open air requirement. We understand that to face an open air does not necessarily require the window to open directly to open air. For instance, balcony sliding door satisfying UVA can still be considered to satisfy the ventilation criteria as illustrated below:  	BD confirmed that the scenarios depicted in the sketch were acceptable provided that conditions in paragraph 4.1(a) to (c) of Appendix A to PNAP APP-130 would be complied with.

11.	**<u>FS Code 2011 - Clause C8.1 (2015 rev.)</u>** Clause C8.1 of FS Code 2011 reads "*Openings should not be formed at fire barriers forming part of a fire compartment as described in Clause C3.1 unless such openings are protected by fire rated doors or fire shutters having an FRR of not less than that of such fire barriers. If the total width of the openings is more than 25% of the length of the compartment walls concerned, the fire rated doors or fire shutters should have an FRR with regard to the criterion of insulation of not less than that of the fire barrier.*" Please advise whether the calculation is correct.	BD advised that, in accordance with Item 7(d) of ADF 1/2012 held on 6.1.2012, in the context of Clause C8.1 of FS Code 2011, the plan lengths of all perimeter fire barriers forming a fire compartment would be taken as the denominator for assessing whether the width of the openings to be installed with fire shutters would exceed 25% of the concerned fire compartment and hence requiring such shutters to have insulation performance as well. For example, in a basement, the length of the enclosing walls on all sides would be added up to obtain the denominator, and only fire shutters making up over 25% of that denominator would need to fulfill the insulation requirement. On the other hand, in the situations of above-ground portions, external enclosing walls which would not be required to have prescribed FRR would not be counted towards the total plan lengths of a fire compartment. In the quoted example, <u>In basement situation</u> For R1 and R2, FRR insulation would not be required if: Compartment A: (R1+R2) / [(b1+c1 +a1) x 2] < 25% and Compartment B: (R1+R2+R3) / [(b1+b2) x 2] < 25% For R3, FRR insulation would not be required if: Compartment B: (R1+R2+R3) / [(b1+b2) x 2] < 25% and Compartment C: R3 / [(c1+b2) x 2] < 25%

	 R1, R2 no need FRR insulation if $\frac{R1+R2}{b1+c1} < 25\%$,and $\frac{R1+R2}{b1+b2} < 25\%$ R3 no need FRR insulation if $\frac{R3}{b2+c1} < 25\%$,and $\frac{R3}{b1+b2} < 25\%$	<u>In above-ground situation*</u> For R1 and R2, FRR insulation would not be required if: Compartment A: (R1+R2) / (b1+c1) < 25% and Compartment B: (R1+R2+R3) / (b1+b2) < 25% For R3, FRR insulation would not be required if: Compartment B: (R1+R2+R3) / (b1+b2) < 25% and Compartment C: R3 / (c1+b2) < 25% *external enclosing walls not required to have prescribed FRR
12.	**<u>Access Panel to Air Duct</u>** PNAP APP-93 specifies the requirements for pipe ducts and its access panels for drainage pipe duct. We understand that access panels for air	BD advised that PNAP APP-93 which set out the requirements for the planning and design of drainage works for new buildings might not be

	duct for non-mandatory plant rooms with GFA exemptions (under item 22 of Appendix A of PNAP APP-151) is not required. We note that such access panel to air duct serves no function at all. Please advise if our understanding is correct.	appropriate for application to air duct. While the provision of access panels for air duct would not be a consideration for GFA exemptions under PNAP APP-151, the relevant requirements on provision of access for inspecting and cleaning/maintenance of ventilating systems under the Building (Ventilating Systems) Regulations should be observed.
	 Notional Plan For Hotel Building	
13.	[illegible] grouting and socketed steel H-pile works be granted concurrently after the successful completion of the test/trial installations for each type of construction.	BD advised the requirement would be a precautionary measure to mitigate possible adverse effect of socketed steel H-pile works to adjacent properties/grounds in marine deposit/loose soil stratum. BD would review the situation if pipe pile wall and grouting would be adopted for ELS works.