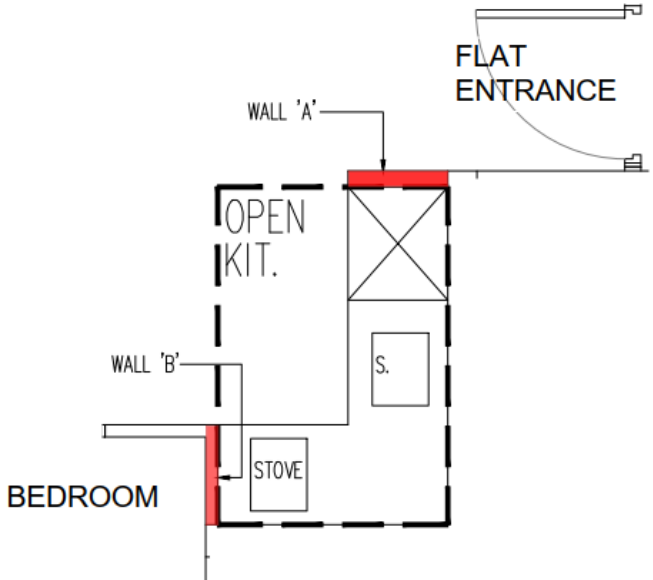
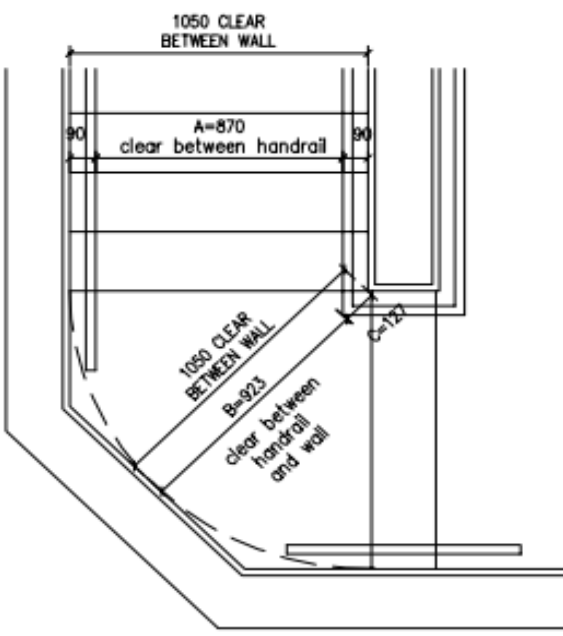


Summary of Items Discussed in APSEC Discussion Forum (ADF) 2/2026 on 8 May 2026

	Items proposed by Convenors for Discussion	Summary of Discussion and BD's Response
	Items raised by HKIA	
1.	<u>PNAP APP-93</u> Referring to PNAP APP-93, it stipulates that for domestic buildings not intended for single occupancy, internal common soil and waste stacks should be accessible from the common parts of the building, and no pipeworks for a unit should protrude into the unit under separate occupancy on the floor below. It is our understanding that this requirement, which aims to obviate access difficulties and facilitate future maintenance of common drains, does not apply to hotel rooms or hostel rooms under the Hostels in the City Scheme, where the premises are under central management and, under the policy, cannot be sold separately. Please advise if our understanding is correct.	BD advised that under PNAP APP-93, no pipeworks for a premises should protrude into other premises under separate occupancy. However, pipeworks for a premises protruding into other premises under separate occupancy might be acceptable when both premises in concern are managed and controlled by the same party, such as guest rooms in a hotel or hostel, with right of access available whenever needed.
2.	<u>Full Height Fire Rated Wall of Open Kitchen</u> Clause C13.4(d) of the Code of Practice for Fire Safety in Buildings 2011 (2024 Edition) (FS Code) requires a full height wall having a fire resistance rating (FRR) of not less than -/30/30 should be provided adjacent to the <u>flat exit door</u> (Wall "A" in diagram below). Would BD clarify if the FRR wall adjacent to the bedroom (Wall "B" in the	BD drew members' attention to Item 18 of ADF 1/2024 held on 23 February 2024 and advised that the purpose of the full height fire rated wall required for open kitchen under Clause C13.4(d) of the FS Code was to shield the occupants from radiant heat of stove fires and allow the necessary pause of occupants to open the exit door (and gate, if any).

	diagram below) is required under Clause C13.4(d).  The diagram shows a floor plan of a flat. It includes a bedroom, an open kitchen (labeled 'OPEN KIT.'), a bathroom (labeled 'S.'), and a staircase. Wall 'A' is the top wall of the kitchen area, and Wall 'B' is the left wall of the bedroom. The flat entrance is at the top right. A red line indicates the required handrail path along the walls and around the stairs.	As Wall “B” in the diagram was not situated adjacent to the exit door of the flat, it was not subject to requirements of Clause C13.4(d) of the FS Code.
3.	<u>Projection of Handrail at Corner</u> Clause B14.6(b) of the FS Code requires that a handrail within the required staircase should not project so as to reduce the clear width of the required staircase by more than 90mm, for each handrail. However, due to the geometry at the corner, the projection would likely exceed 90mm. As illustrated in the diagram below of a staircase with an outer corner splayed, taking into account the clear width between the handrails at the straight flight (“A”) and at the landing (“B”), would BD consider accepting the handrail projection at the corner (“C”), which exceeds 90mm?	BD advised that according to Note 3 of Table B2 of the FS Code, the width of a required staircase and staircase landing should be measured between the finished surfaces of walls or of the inner sides of any balustrade and should not be decreased by the introduction of any projections other than handrails the projection of which should not exceed 90mm. Hence, the proposed layout as illustrated in the diagram was considered not acceptable.

	 The diagram illustrates a staircase layout with specific clearance requirements. At the top, a horizontal dimension of 1050 is labeled '1050 CLEAR BETWEEN WALL'. Below this, a horizontal dimension of 870 is labeled 'A=870 clear between handrail', with 90-unit clearances on either side. The staircase itself has a diagonal dimension of 923 labeled 'B=923 clear between handrail and wall'. At the bottom, another horizontal dimension of 1050 is labeled '1050 CLEAR BETWEEN WALL'. A vertical dimension of 120 is labeled 'C=120'.	
4.	<u>Braille and Tactile Floor Plan</u> Paragraph 69(2) of the Design Manual: Barrier Free Access 2008 (2025 Edition) (DMBFA) states “<i>if a floor plan for the use of the public is provided, Braille and tactile floor plan showing the main entrance, public toilet and major common facilities shall be provided in a place in that building which is conspicuous to persons with visual impairment</i>”. For a shopping complex which no visual floor plan is to be provided, would BD clarify if a Braille and tactile floor plan is required to be provided.	BD advised that according to paragraph 69(2) of DMBFA, Braille and tactile floor plan was not required if a floor plan for the use of the public was not provided.

5.	<u>Registration of Letters of Undertaking in the Land Registry</u> Paragraph 20 of JPN No. 1, Paragraph 16 of JPN No. 2, Paragraph 11 of PNAP APP-104 and Paragraph 10(c) of Appendix D to PNAP APP-152 require the registration of relevant letters of undertaking, with the specified contents, in the Land Registry before applying for an occupation permit (OP). To our understanding, registration is not necessary unless it is explicitly specified in the corresponding PNAP/JPN, or as a condition of the modification where applicable. For example, registration of the following is not necessary unless it is explicitly stated in the conditions of modifications: - Letter of undertaking regarding external drainage pipes enclosed by architectural features under paragraph 2 of Appendix B to PNAP APP-93. - Letter of undertaking regarding BEAM Plus certification and provision of estimated energy performance/consumption under paragraph 6(d) of PNAP APP-151 (version August 2022 or before). Would BD confirm if HKIA's understanding is correct?	BD advised that the understanding of the HKIA was correct. Registration in the Land Registry for the following undertaking letters was required before OP application and might be imposed in the condition of the modification/exemption granted, if applicable: (a) For surrender/dedication of land to permit the site coverage and plot ratio to be exceeded in accordance with regulation 22 of the Building (Planning) Regulations (B(P)R); (b) For greenery areas and specific greening features for gross floor area (GFA) concessions under Appendix D to PNAP APP-152; (c) For projecting planters and maintenance walkways to be excluded from GFA and site coverage calculations under PNAP APP-19; (d) For residential recreational facilities to be excluded from GFA calculation under PNAP APP-104; (e) For the provisions of specific standards under Appendix C to PNAP APP-151, including enhanced greenery provision, relevant features for health and well-being, as well as the light well and the required open area of the floor below for enhanced natural ventilation; and (f) For the relevant green and innovative features to be excluded from GFA and SC calculations under JPNs. 1 and 2.
6.	<u>Firefighting and Rescue Stairway (FRS)</u> Pursuant to FSD Circular Letter No. 2/2025, data centres are now classified by the FSD as a distinct type of premises with revised fire safety requirements.	BD advised that the issue was being reviewed and the relevant proposal would be submitted to BSC & APSEC for comments shortly. In the

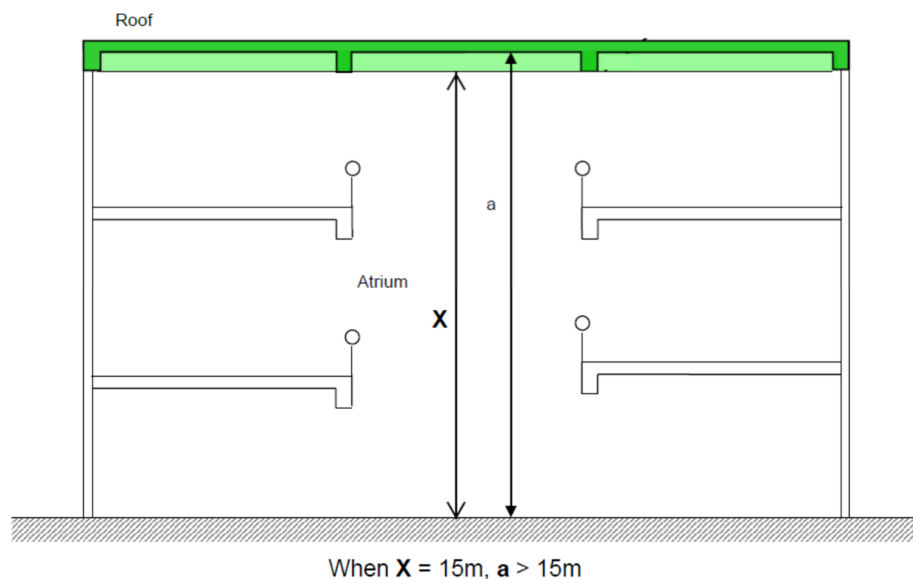
	Unlike the previous industrial classification, the revised Code of Practice for Minimum Fire Service Installations and Equipment no longer requires the provision of an FRS for data centres. Pending the formal updating of the FS Code to reflect this change, would BD please confirm that an FRS is not required for a building used as a data centre but currently classified as an industrial building under the prevailing code.	meantime, proposal involving non-provision of FRS in data centres would be considered on a case by case basis.
7.	<u>Qualified Supervision and Quality Audit for Heat Soak Test</u> BD circular letter (BD reference no: BD GR/1-125/54) dated 22 April 2022 sets out the qualified supervision and quality audit requirements for precast concrete construction, modular integrated construction, and the heat soak process for tempered glass. The use of videotelephony as an enhanced alternative arrangement is subject to the requirements set out in paragraph 6 of the letter. In particular, AP, RSE, and AS are required to submit the quality audit reports together with non-rewritable DVD-ROM discs containing the video to BD within 14 days after completion of the supervision/audit checks. For each disc, they should certify using a permanent marker to signify that they personally used videotelephony for compliance with the approval conditions. However, for heat soak testing, qualified supervision and quality audit for the heat soak test are not required for the AP's stream. The HKIA considers that, in this context, AP is not required to sign the DVD-ROM, as the certification statement would be a false statement and would conflict with what has been	BD advised that the understanding of HKIA was correct. Paragraph 14(e)(iii) of PNAP APP-37 set out that if the alternative arrangement of employing videotelephony for the tempered glass panes undergoing the heat soak process was adopted, all supervision items covered in the videos taken should be recorded contemporaneously in quality control supervisor (QCS) inspection log book and should be submitted together with the DVD-ROM discs of the videos taken to BD within 14 days after completion of the heat soak process for each batch of tempered glass panes. Only the RSE should certify on each disc with a permanent marker signifying that his/her QCS personally use videotelephony for compliance with the approval conditions.

	carried out by the AP's stream. Would BD please clarify how AP should comply with the DVD-ROM certification requirement for heat soak testing?	
	Items raised by HKIE	
8.	<u>Definition of Span in Clause 9.4.1 of Code of Practice for Structural Use of Concrete 2013 (2020 Edition) (Concrete Code)</u> Clause 9.4.1 of the Concrete Code specifies minimum depth of beam or slab thicknesses for different spans of cantilevered projecting structures. There is however no clear definition of the meaning of 'span' in the code. Is it the clear span or design span? Paragraph 1(a) of Appendix A to PNAP APP-68 states that for cantilever of clear span more than 1000 mm, a beam-and-slab type of arrangement should be used instead of pure slab cantilever where practicable. 'Clear span' is also indicated in the series of diagrams in Appendix B of the above PNAP. Would BD please confirm that the span mentioned in Clause 9.4.1 of the Concrete Code refers to the clear span of cantilevered projecting structures? As raised in item 20 of ADF 1/2023 held on 10 February 2023, paragraph 6(a) of Appendix A to PNAP APP-68 has to be revised to tally with the revised requirements in the second paragraph of Clause 9.4.1 of the Concrete Code. Would BD please provide an update on the progress of the revisions to PNAP APP-68?	BD confirmed that the span specified in Clause 9.4.1 of the Concrete Code should refer to the clear span of cantilevered structure. BD advised that an amendment to the Concrete Code was being prepared to incorporate the updated design and construction requirements for cantilevered reinforced concrete structures. Upon promulgation of the amendment to the Concrete Code, PNAP APP-68 would be updated in due course.

9.	<u>Wind Load for the Design of Free-standing Glass Balustrade with Laminated Tempered Glass Without Top Handrail</u> For free-standing glass balustrade without top handrail, it is categorically specified in the 4th paragraph of Clause 6.4.1 of the Code of Practice for Structural Use of Glass 2018 (Glass Code) that the handrail may be omitted if the remaining intact glass pane of laminated glass used in the balustrade is capable of resisting the working wind load or horizontal imposed load when one layer in laminated glass is broken. It is not mentioned in the Glass Code what magnitude of wind load has to be adopted for this extreme condition. As the laminated glass panes have been designed for the most critical condition under full wind load or horizontal imposed load at the ultimate limit state, further checking of the above extreme condition using the full wind load will demand the use of thicker glass panes unnecessarily. The probability of one layer of laminated glass pane breaking during a severe typhoon is extremely low. To avoid unnecessary thickening of glass panes, it is suggested that the wind load for checking the above extreme case be taken as 70% of the full design wind load, taking it as a temporary condition stipulated in Clause 2.5 of the Code of Practice on Wind Effects in Hong Kong 2019 (the Wind Code). It is only a temporary condition in that the broken glass panes would be immediately replaced after the typhoon. Would BD please confirm that 70% of full wind load can be adopted for checking the extreme condition of wind load acting on one glass pane.	BD advised that in accordance with Clause 2.5 of the Wind Code, the requirement to adopt a minimum of 70% of the design wind loads was applicable to the temporary buildings and associated constructions that were not used for residency only, and was not applicable to the design of free-standing glass balustrade for permanent use. Paragraph 4 of Clause 6.4.1 of the Glass Code set out that the top rail might be omitted if the remaining intact glass pane of laminated glass used in the balustrade was capable of resisting the working load when one layer in a laminated glass pane was broken, where the working load was considered as unfactored horizontal imposed load or unfactored wind pressure, whichever produces the greater adverse effect.
10.	<u>PNAP ADM-19 – Building Approval Process</u> According to PNAP ADM-19 – Building Approval Process, under the sub-	BD advised that while the RSE had adopted the sample drawings as per

	section “Erection of Fire Damper in Ventilation System, Supporting Frame for Suspending Air-conditioning Plant or Mechanical Ventilation Plant, and Large Metal Ventilation Duct or Associated Supporting Frame inside Building”, paragraph 41 states <i>“For development projects or A&A proposals, the proposed minor building works described in paragraph 40 above should be included in the plans for approval before submitting application for OP/TOP or certificate of completion of building works respectively ...”</i>, while paragraph 43 states <i>“As an alternative for development projects and A&A proposals pending first plan approval, the AP/RSE may consider incorporating the information in paragraph 42(a) above and sample drawings for the structural details given in Appendix B11 to PNAP ADV-33 in the first submission of GBP and superstructure plans respectively...”</i> Would BD please advise on the structural plan submission requirements under the following scenario: Where the structural details given in Appendix B11 to PNAP ADV-33 are strictly followed, would structural calculations still be required to be submitted as part of the structural submission?	Appendix B11 to PNAP ADV-33 in the structural plan submission of supporting frames for building services, the RSE would not be requested to submit the structural calculations of supporting frames to BD for consideration of plan approval. Nonetheless, the RSE was responsible for ensuring that the sample drawings including essential information (i.e. design loads, standards, material specifications, etc) being adopted were applicable to his proposed works and structural plan submission. Moreover, he/she was also required to demonstrate with structural calculations that the installation of the proposed works was compatible with the parent building (i.e. structural adequacy of embeds and supporting structural elements, etc).
	Items raised by AAP	
11.	<u>Height of Atrium</u> According to Clause C10.3(c) of the FS Code, <i>“the maximum height from lowest connected floor to the underside of the lowest structural member of the ceiling of the upper-most connected floor should not exceed 15m”</i>.	BD confirmed AAP’s understanding was correct.

Referring to the diagram below, the dimension “X” shall not exceed 15m. When “X” is 15m, the dimension “a” could be more than 15m. Would BD please confirm if our understanding is correct.



12. **Underground Car Parks**

In accordance with paragraph 3 of Appendix C to PNAP APP-2, circumstances that may be favourably considered in accepting a car park as an underground car park:

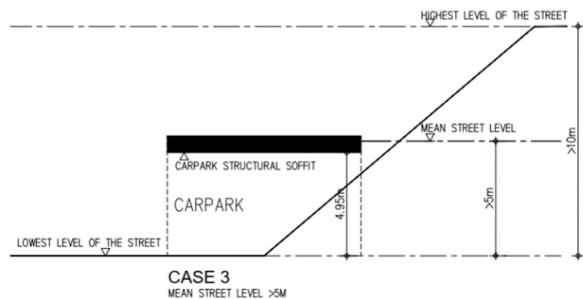
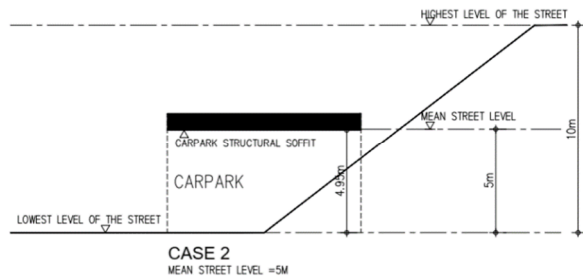
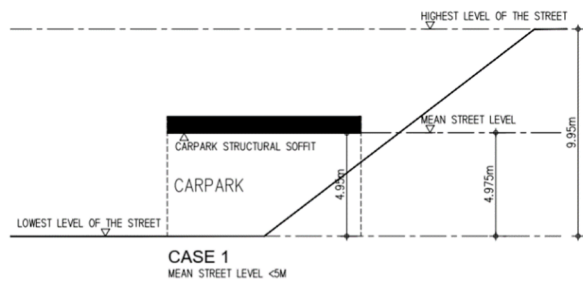
(a) If the site abuts on only one street, the structural ceiling soffit of the car park is at or below the mean level of that portion of the street on which the site abuts (referred to as “mean street level” hereinafter), provided that such mean

BD advised that under paragraph 3(a) of Appendix C to PNAP APP-2, Case 3 could not be accepted as underground car park for the purpose of GFA concession as its mean street level was more than 5m above the lowest level of the street.

Nevertheless, favourable consideration might be given if there were site constraints that affect the design and location of the car parking floors,

level is not more than 5m above the lowest level of such portion of the street;

For a car park with structural ceiling soffit at 4.95m above the lowest level of the street, we have the opinions that all the following cases can be accepted as underground car parks:



provided that the topmost car park floor is semi-sunken and follows the slope profile of the site and adjoining land, etc, according to paragraph 3(d) of Appendix C to PNAP APP-2.

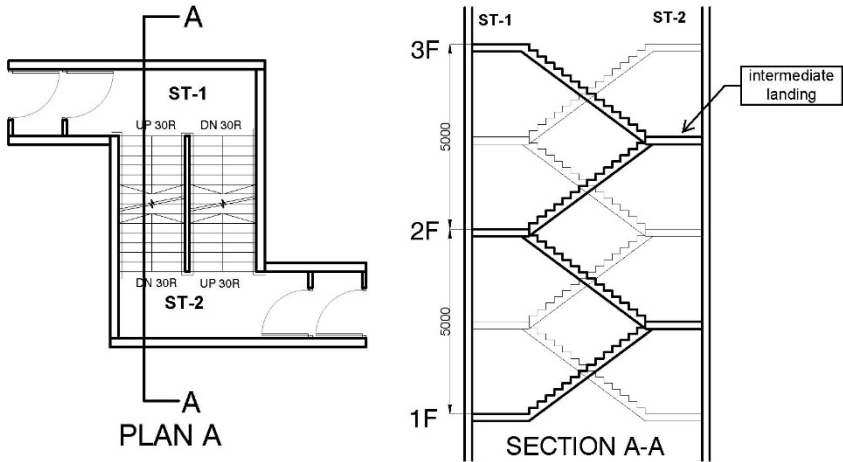
In passing, BD reminded that excessive headroom of car parks should be justified for Building Authority (BA)'s consideration upon general building plan (GBP) submission.

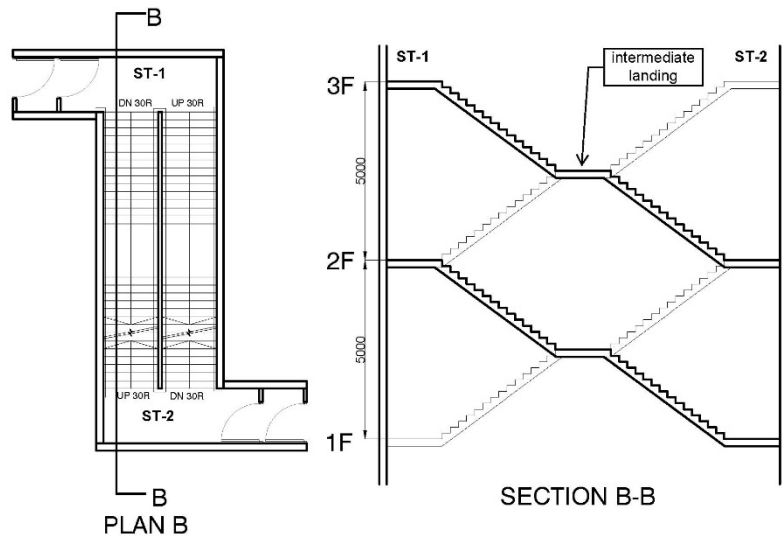
13.	<u>Hostels in the City Scheme – Provision of Access Facilities for Telecommunications and Broadcasting Services</u> According to B(P)R 28A and PNAP APP-84, every commercial building, industrial building, residential building (other than a building for the residence of a single family) and hotel building shall be provided with access facilities for telecommunications and broadcasting services in accordance with the design requirements as may be specified by BA from time to time. Our understanding is that hotel building in the above shall cover student hostel for the provision and requirements of Access Facilities for Telecommunications and Broadcasting Services, as both building uses shall similar nature in terms of operation. Would BD please clarify if the above understanding is correct?	BD advised that student hostel was a specified building where access facilities for telecommunications and broadcasting services should be provided under regulation 28A of the B(P)R. It had been recently reviewed with Office of the Communications Authority and agreed that when considering the provision of such facilities in proposed student hostels, “no. of rooms” was similar in nature as “no. of flats” in residential buildings. Therefore, when a GBP submission under the Hostels in the City Scheme involving newly built student hostel or such conversion of existing commercial building or hotel into student hostel which would result in a new building was received, provision of such access facilities would be assessed in accordance with the requirements under “Residential Building” in PNAP APP-84. The said clarification will be updated in PNAP APP-84 accordingly.
	Items raised by AREC	
14.	<u>Demolition of Retaining Walls</u> Paragraph 10 of PNAP APP-54 provides that “<i>where it is intended to demolish an existing retaining wall, demolition plans and supporting documents as prescribed in regulation 8(3) and (4) of the Building (Administration) Regulations should be submitted for approval</i>”.	BD advised that if a retaining wall did not support a building to be demolished and was to be removed as part of site formation works or ELS works, the demolition of the retaining wall might be incorporated into the site formation plan or ELS plan for BA’s approval. In such cases, all related documents for the demolition of the retaining wall as prescribed

	Please clarify whether the demolition of retaining walls can be incorporated in a site formation plan or an excavation and lateral support (ELS) plan such that a separate demolition plan is not required. Also, please clarify whether the demolition of retaining walls can be carried out by a Registered General Building Contractor(RGBC) or a Registered Specialist Contractor(RSC) who is not in the demolition work category.	under regulations 8(3) and (4) of the Building (Administration) Regulations (B(A)R) should be included in the submission. On the other hand, if the retaining wall supported a building to be demolished, demolition plans and supporting documents as prescribed in regulation 8(3) and (4) of the B(A)R should be submitted for BA's approval. The demolition works might be carried out by an RGBC or an RSC subject to the conditions as specified in the Appendix A of PNAP APP- 96.
15.	<u>Supervision of Curtain Wall</u> According to the Code of Practice for Site Supervision 2009 (2024 Edition), the Registered Contractor's stream is required to provide a full-time TCP T1 to inspect and supervise curtain wall works on site. Based on our understanding, this full-time TCP T1 should be stationed at the factory in China when the curtain wall is to be installed onto the MiC modules there. In such a scenario, would BD accept that the corresponding TCP records be kept at the MiC factory instead of at the project site?	BD advised that according to Appendix B to PNAP ADV-36, TCP T1 of Quality Control Co-ordination Team (QCCT) under Registered Contractor's stream should provide continuous qualified supervision to the modular unit production works in the prefabrication factory and his/her supervision should cover the fabrication, assembly, installation and examination of modular units and pre-installed finishes including curtain wall works if they were installed in the prefabrication factory. Both Quality Control Supervisory Team (QCST) under AP/RSE's stream and QCCT should record the details of production, inspection, auditing and testing of modular units in an inspection log book. The log book should be kept in the prefabrication factory and a copy of which should be kept at the building site office and, when required, produced for inspection by BD officers. Paragraphs 4 to 6 of Appendix B to PNAP ADV-36 were relevant.

	Items raised by PBSCA	
16.	<u>Clauses B9.1 and D7.3 of the FS Code</u> For an entrance of a hotel building at G/F, there is a passage from fire service access point to fireman's lift. According to Clause D7.3 of the FS Code, the passage should be separated from the remainder of the ground storey by walls with adequate FRR and any opening in these walls for communication with ground storey should be through a protected lobby complying with Clauses C9.3 and C16.5 of the FS Code. In order to enhance design flexibility, a protected lobby with FRR self-closing glass sliding doors is proposed as per the diagram attached below, for communication between the entrance lobby and the adjacent car park / loading and unloading bay, provided that the protected lobby is in compliance with Clauses C9.3 and C16.5 of the FS Code. In addition, Clause B9.1 of the FS Code provides that the required staircase should be so continued at ground storey as to separate from the remainder of the building and every opening should be separated by a protected lobby. The proposed protected lobby with FRR self-closing glass sliding door are in compliance with Clause B9.1 of the FS Code as well. A schematic diagram is attached for easy reference.	BD advised that under Clause D7.3(b) of the FS Code, the passage from the fire service access point to the fireman's lift should be separated from the remainder of the ground storey by walls having the requisite FRR. Opening in these walls might only be allowed for communication with the ground storey through a protected lobby. In addition, under Clause B9.1 of the FS Code, for the passage leading from the required staircase, every opening from the ground storey to such passage should be separated from it by a protected lobby. Subject the above requirements, AP should demonstrate that the proposed fixed glass partition with self-closing glass sliding doors shown in the diagram should comply with the provisions under Clause C16.5 of the FS Code, supported by test reports in accordance with the applicable standards under Section 4 of Part E of the FS Code. In case the protected lobby to other facilities/areas/passages to which persons with a disability should have or might reasonably be expected to have access, all the relevant requirements under Divisions 9 and 10 of Chapter 4 of DMBFA should be complied with. BD reminded of the duties and responsibilities of registered building professionals and registered contractors under the BO, in particular, to ensure all materials used in building works must be of a nature and quality

Would BD adopt a pragmatic approach to accepting this proposal to allow design flexibility?	suitable for their intended use or purpose and adequately tested by recognised tests.
17. <u>Lighting and Ventilation of Laundry</u> In view of the increasing demand due to government policy on student hostel, and to allow flexibility for conversion. Would BD consider granting a modification of the provisions regarding lighting and ventilation of laundry in hotel building or student hostel under the Hostels in the City Scheme, provided that mechanical ventilation and artificial lighting are installed?	BD advised that for provision of prescribed windows under regulations 29 to 35 of B(P)R, a laundry being part of or used in connexion with any building (including hotel or student hostel) shall be deemed to be used for the purpose of habitation under regulation 35(2) of B(P)R. In view of a laundry would emit heat, odour and moisture from washing / drying machines, the requirements on provision of prescribed window should be maintained as to upheld the health standard of buildings.

	AOB Items	
18.	<u>Discharge Value of Scissors Staircase</u> (Item raised by AAP) According to Clause B12.7 of the FS Code, “<i>the discharge value of a scissors staircase without any intermediate landing between 2 consecutive floors should be... multiplied by a reduction factor of 0.7</i>”. Our understanding is that the design of the two different scissors staircases under Case 1 and Case 2 as illustrated in the diagrams below both consist of intermediate landing between 2 consecutive floors thus it is not necessary to apply the reduction factor in determining the staircase’s discharge value. Would BD please confirm if our understanding is correct.  The diagrams illustrate two scissors staircase configurations, ST-1 and ST-2, for Case 1. PLAN A (left): A top-down view of the staircase layout. ST-1 is an upper staircase with 'UP 30R' and 'DN 30R' flights. ST-2 is a lower staircase with 'DN 30R' and 'UP 30R' flights. A horizontal line 'A' indicates the location of the section cut. SECTION A-A (right): A vertical cross-section showing the two staircases between floors 1F, 2F, and 3F. ST-1 is the upper staircase and ST-2 is the lower staircase. Both have a flight length of 5000 units. An 'intermediate landing' is shown between the two staircases at the 2F level. <u>Case 1</u>	BD advised that AAP’s understanding was correct.



Case 2

19. **Expiry of Modification on 29 June 2026 Granted for GFA Concession**
(Item raised by BD)

The implementation of the new GFA concession mechanism as stipulated in paragraphs 6 to 9 of the PNAP APP-151 are applicable to all new GBP or major revision of GBP for development proposals submitted to the BA for approval on or after 30 June 2024, and to GBP which have been previously disapproved and are resubmitted for approval on or after 30 June 2024. Paragraph 10 of the said PNAP further stated that subject to section 16(3)(d) of the Buildings Ordinance (BO), GBP approved prior to the implementation of the new mechanism should make reference to the requirements on GFA concessions promulgated in the “August 2022” version (old mechanism) of the said PNAP. That said, consent to commencement of works may be

Members noted.

refused where a period exceeding 2 years has elapsed since approval of the GBP submitted before 30 June 2024 adopting the old mechanism of GFA concession. In this connection, modifications granted in Forms BD106 for the old mechanism had imposed a time limit with expiry date on or before 29 June 2026. APs are reminded of the above deadline. Development proposal with approved GBP adopting the old mechanism of GFA concession, for which, consent to commence the approved superstructure works is not obtained on or before 29 June 2026 or where such consent has been obtained but is deemed to be revoked under section 20(1) of the BO after that day, the modification granted will expire and cease to have effect. GBP without a valid Form BD 106 will be in contravention of the BO as the proposed works have deviated from the requirements of specific regulations. Any amendment plan based on such previously approved plans will also contravene the BO and its subsidiary Regulations, and may be disapproved under section 16(1)(d) of the BO. Likewise, an application for consent to commence the works shown in such previously approved plans may be refused under sections 16(3)(a) and 16(3)(d) of the BO. Extension of time prior to the expiry of the Form BD106 is generally not supported, and may only be considered on a case by case basis according to the principles set out in paragraphs 11 to 13 of Annex I of the Circular Letter dated 31 December 2012.	
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