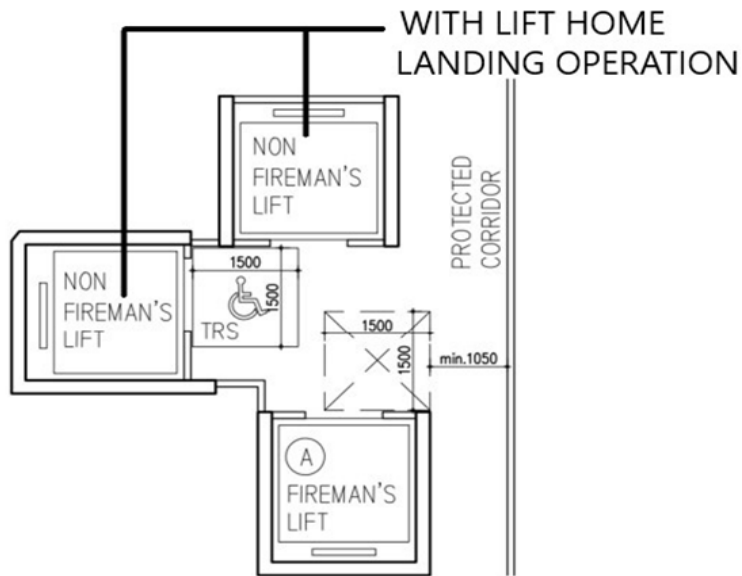


Summary of Items Discussed in APSEC Discussion Forum (ADF) 1/2026 on 6 February 2026

	Items proposed by Convenors for Discussion	Summary of Discussion and BD's Response
	Items raised by HKIA	
1.	<p><u>Requirement of Open Kitchen</u></p> <p>For the natural ventilation requirement of open kitchen, the openable window area not less than 1/10 of the kitchen area may be provided by a window at the living room where the open kitchen is located, in addition to the openable window requirement for the living room. There is no requirement for the open kitchen area to be within the "direct sight line" to the openable window. For avoidance of doubt, the "direct sight line" requirement is applicable for the provisions of natural lighting only and can be fulfilled by fixed glass portion of a prescribed window.</p> <p>We would like to seek BD's view on our understanding.</p>	<p>BD advised that as per item 22 of ADF 2/2021 held on 19 March 2021, open kitchen should be located in a position where most of the open kitchen area could face the concerned prescribed window(s) of the room for the required natural lighting and ventilation.</p> <p>When assessing whether the kitchen area faces prescribed window of concern, the requirements for natural lighting and ventilation should be evaluated in conjunction. Individual cases with design constraints might be considered on case basis.</p>
2.	<p><u>Requirement of Open Kitchen</u></p> <p>To facilitate BD's checking of the general building plan (GBP), the notional area of open kitchen is shown on the GBP for demonstrating compliance with the provisions of natural lighting and ventilation, along with its relation to the exit route and the room containing soil fitment. There is no requirement for the notional area of the open kitchen to be demarcated in actual finished condition.</p> <p>We would like to seek BD's view on our understanding.</p>	<p>BD advised that HKIA's understanding was correct.</p>

<p>3.</p>	<p><u>Assessment of Occupant Capacity</u></p> <p>Note 3 to Table B1 of the Code of Practice for Fire Safety in Buildings 2011 (2024 Edition)(FS Code) remarked that "<i>the Building Authority recognises actual counting as a reliable way to establish the occupant capacity of a building</i>".</p> <p>We would like to seek BD’s clarification to confirm that there has been no change in the policy regarding the acceptance of actual counting.</p>	<p>BD advised that Note 3 to Table B1 of the FS Code remained valid and in effect. The actual counting might be considered with sufficient justifications provided by AP.</p>
<p>4.</p>	<p><u>Temporary Refuge Space (TRS) at Lift lobby</u></p> <p>With reference to item 22 of ADF 3/2025 held on 8 August 2025, it was confirmed that the arrangement of TRS in front of the lifts not designated as fireman’s lifts, which caused obstruction to access to the lift lobby, was not acceptable.</p> <p>If lift home landing operations are provided for the lifts not designated as fireman’s lifts, with TRS located in front of the lift doors resulting in the doors of such lifts not opening during a fire alarm, would BD consider such an arrangement acceptable?</p>	<p>BD advised that according to Clause B16.1 of the FS Code, every lift lobby should have access, without any obstruction and lockable door, to an exit route. Such access should be available at all times to any person who may come out from a lift car to the lift lobby. Therefore, the TRS positioned in front of the lift doors causing an obstruction to the access of the lift lobby, was not acceptable.</p> <p>The proposed arrangement of TRS in front of non-fireman’s lifts with “lift home landing operation” would only be subject to the provision of sufficient justifications by AP and comments from FSD on case basis. The responsible party to ensure the reliability of such system should be clearly identified.</p>



5. **PNAP APP-23 - Hoardings, Covered Walkways and Gantries**

Paragraph 7 of PNAP APP-23 stipulates that for building works other than demolition works, precautionary measures should be provided in accordance with Appendix D and should meet the design requirements specified in Appendix C. Paragraph 4 of Appendix D lists out the circumstances under which single board hoardings without a covered walkway may be accepted. From the narratives in this latest version of the PNAP, it appears that single board hoarding is the minimum requirement for the provision of such precautionary measures.

However, situations often arise with various site constraints that render hardship in providing single board hoardings. (e.g. hoardings needed to be

BD advised that according to regulation 66(2) of the Building (Planning) Regulations (B(P)R), except on isolated sites, all hoardings, unless exempted by the BA, shall be close boarded. The requirements under paragraph 4 of Appendix D to PNAP APP-23 were mainly to specify the circumstances that provision of single board hoardings without covered walkway might be accepted. In view of different site situations which warrant different safety precautionary measures, proposal of non-provision of close boarded hoarding should be considered on case basis provided that the safety of the public would not be jeopardised. Therefore, BD's responses in item 15 of ADF 2/2023 and item 3 of ADF 2/2024 held on 5 May 2023 and 3 May 2024 respectively were still valid.

	<p>placed on or close to a steep slope; existence of large trees or clusters of trees which result in insufficient space for concrete plinths or extra long spans between plinths; hoarding for road formation works and related civil works, etc.) These challenges may lead to the potential danger of overturning of the hoarding. In such situations, alternatives such as chain link fences with tarpaulin sheets, water barriers, etc. may provide a more practicable solution due to their light weight, flexibility and/or reduced disturbance to the public.</p> <p>Considering the above, we would like to enquire if BD’s reply to item 15 of ADF 2/2023 dated 5 May 2023 is still valid, i.e. <i>“in view of different site situations which warrant different safety precautionary measures, proposal of non-provision of close boarded hoarding should be considered on case basis provided that the safety of the public would not be jeopardised”</i>.</p>	
6.	<p><u>PNAP APP-84 - Access Facilities for Telecommunications and Broadcasting Services</u></p> <p>PNAP APP-84 sets out the detailed spatial requirements on the provisions of various telecommunications and broadcasting facilities. Demonstration of compliance shall be incorporated into the GBP submissions for BD and OFCA’s review.</p> <p>However, there are recent cases that the OFCA case officer has further required the applicant to seek no adverse comments from all listed mobile network operators (MNOs) before OFCA would provide their favourable reply to the submitted GBP, even though such a requirement is not stipulated in the PNAP. Similar to the liaison with other utility companies, we understand that such</p>	<p>BD advised that according to regulation 28A of B(P)R, every specified building shall be provided with access facilities for telecommunications and broadcasting services in accordance with PNAP APP-84 for the approval of GBP. Support from OFCA would be required for two scenarios only : (i) for a specified building which was not required to provide access facilities for mobile services (MAF), rooftop telecommunications equipment room or intermediate telecommunications equipment room might be provided in special circumstances and (ii) an alternative building, other than the tallest building within a development comprising multiple specified buildings is selected for the provision of</p>

	<p>liaison with MNOs would not be a pre-requisite prejudicing the approval of the GBP. Please confirm that our understanding is correct.</p>	<p>MAF.</p> <p>Notwithstanding the above, AP were strongly advised to keep close working relationship with mobile network operators (MNOs) and consolidate the requirements of MAF at earliest stage for effective operation of MAF.</p>
<p>7.</p>	<p><u>Aboveground Carpark</u></p> <p>According to paragraph 18(b) of the latest PNAP APP-2, it is noted that for the aboveground car park with no more than two floors, 100% of the gross floor area (GFA) of private car parks, public car parks and loading and unloading areas at ground level can be disregarded.</p> <p>Would BD please advise if the following interpretations are correct:-</p> <ol style="list-style-type: none"> 1. Aboveground carparking floors with 100% GFA concession can be located on any floors, and are not required to be consecutive. The car ramp solely serving such carparking floors is also 100% disregarded from GFA calculations. 2. For cases with more than 2 floors of aboveground car park, the additional carparking floors are 50% GFA accountable, and the car ramp serving both GFA accountable and non-GFA accountable carparking floors can be 100% disregarded from GFA calculations. 	<p>BD advised that:</p> <ol style="list-style-type: none"> (a) For item 1, HKIA’s understanding was correct. (b) For item 2, according to paragraph 12 of Appendix C to PNAP APP-2, in the case of the car ramp and run-in/out serving both car parking spaces at such floors entitling 100% GFA concessions and car parking spaces at other aboveground floors entitling only 50% GFA concessions, the percentage of GFA concessions of such run-in/out or driveway areas would be calculated on a pro-rata apportionment basis judging on the merits of each individual cases. <p>Practitioners were encouraged to make use the automated checking tools developed by the BD for preparation and checking of floor area calculations.</p>

8.	<p><u>Works required under lease conditions</u></p> <p>For a development, building works required under lease conditions are usually located in coloured areas (e.g., Pink Areas or Green Areas). We would like to seek clarification from BD on whether the approval and consent from BA are required for the building works or site formation works within the coloured areas.</p> <p>On the other hand, works carried out within coloured areas are usually building works for government departments (such as TD, HyD, DSD, etc.) Upon completion, these works will be handed back to the relevant departments. Because of this, these works are usually required to strictly follow the standard drawings and design standards set by those departments. However, some of the design standards from the relevant departments may not comply with BO. If approval and consent are required for these works, would BD consider granting modifications for the works required under the lease if the designs meet the standards of the relevant government departments?</p>	<p>BD advised that pursuant to section 41(1)(ba) of BO, unleased land in respect of which a person was, under the terms of a Government lease, under an obligation to maintain, was not exempted from the provisions of BO. Submission of building works to the BA for approval should comply with the provisions of BO including those required under lease conditions outside private lot boundary to be handed over to the Government upon completion of works. Nevertheless, the application for modification would be considered for special circumstances.</p>
Items raised by HKIE		
9.	<p><u>Wind Pressure Criterion for Structural Submission of Window or Window Wall Plans in PNAP APP-37</u></p> <p>In paragraph 5 of PNAP APP-37, the wind pressure criterion under the Code of Practice on Wind Effects in Hong Kong (the Wind Code) 2019 has been set as the wind reference pressure, $Q_{0,z}$, being 2.86 kPa or more. However, the design wind pressure on the window or window wall concerned should be multiplied by the related wind directionality factor, with the application of the</p>	<p>BD advised that according to paragraph 5 of PNAP APP-37, structural submission of window or window wall plans were required when the window or window wall was at 100m or more above adjoining ground level, or where the wind reference pressure $Q_{0,z}$ (or design wind pressure q_z in preceding Wind Code 2004) is 2.86 kPa or more. This wind</p>

	<p>topographic factor, size factor, and pressure coefficients, etc. The resultant design wind pressure, $Q_{o,z} \times S_0$, will match the design wind pressure under the Wind Code 2004. Would BD please confirm if the above interpretation is correct.</p>	<p>reference pressure $Q_{o,z}$ was an unfactored value determined from Table 3-1 of the Wind Code 2019 at the effective height, Z_e, for open exposure in flat terrain. Figure 2.2 of the Wind Code 2019 is relevant.</p> <p>The design wind pressure on the window or window wall shall then be obtained by multiplying the wind reference pressure $Q_{o,z}$ by related wind directionality factor, topography factor, size factor, pressure coefficients, etc. complying with the requirements as set forth in the Wind Code, regardless of whether a structural submission was required or not.</p>
10.	<p><u>Streamlining the Application of Modification of Regulation 31(1)(a) of the Building (Construction) Regulation (B(C)R)</u></p> <p>Regarding item 16 of ADF 1/2025 held on 14 February 2025, it was noted that BD would revise PNAP APP-37 to allow blanket application for modification of/exemption from regulation 31(1)(a) of the Building (Construction) Regulation (B(C)R) with a percentage of drilled-in anchors for fixing curtain wall not exceeding a specified value (25% in general). If the specified percentage was exceeded, an application for modification/exemption would be required. Would BD clearly specify what action the RSE needs to take if the percentage of drilled-in anchor supports exceeds 25%?</p>	<p>BD advised that if the specified percentage (generally 25%) was exceeded, AP/RSE was required to submit an application (i.e. Form BA16) for modification of/exemption from regulation 31(1)(a) of the B(C)R under Section 42 of the BO to apply for modification/exemption in respect of those remedial drilled-in anchors. The application for modification/exemption would be considered on case basis, and additional conditions (e.g. increasing the sampling rate for the strength test of remedial drilled-in anchors) might be imposed.</p>
11.	<p><u>Flat Slab Design Using Finite Element Analysis (FEA)</u></p> <p>Following the discussions in item 7 of ADF 5/2022, item 18 of ADF 3/2024 and item 9 in ADF 2/2025 held on 22 November 2022, 9 August 2024 and 9 May 2025 respectively on flat slab design regarding the applicability of the</p>	<p>BD advised that the issue had been deliberated in the Meeting of the TC. It was agreed in principle that an increase of design shear stress, as stipulated in clause 6.1.5.6(b) and (c) of the Concrete Code, was not</p>

	<p>relevant clauses in the Code of Practice for Structural Use of Concrete 2013 (2020 Edition)(Concrete Code) when employing FEA for flat slab analysis, would BD please provide an update on the deliberations/conclusions of the Technical Committee on the Code of Practice for Structural Use of Concrete (TC).</p>	<p>required if the FEA results had already accounted for the effects of moment transfer at the column in the analysis. The list of BD's pre-accepted structural programs would specify whether the effects of moment transfer at columns had been validated and address any limitations of the model.</p> <p>BD advised that an amendment to the Concrete Code was being prepared to incorporate this issue.</p>
Items raised by AAP		
12.	<p><u>PNAP APP-84 Telecommunications and Broadcasting Services</u></p> <p>According to Appendix A1 of PNAP ADV-33, the telecommunications and broadcasting (TBE) room is one of the basic information to be shown on the GBP for Stage I approval.</p> <p>Would BD please advise when the design for MAF has generally complied with the requirements specified in Appendix C of PNAP APP-84, it is not necessary to obtain the input from the MNOs on the MAF nor the agreement between the building developer and the MNOs for Stage I GBP approval.</p>	<p>[Please see BD's responses in item 6 above].</p>
Items raised by ACEHK		
13.	<p><u>Requirement of Checking on Total Settlement of Foundation Design</u></p> <p>Clause 2.3.2(2) of Code of Practice for Foundation 2017 (2024 Edition) (Foundation Code) laid down the reference criteria for acceptable foundation settlements. Criterion (a) of maximum total settlement not exceeding 30mm</p>	<p>BD advised that the criterion (a) of clause 2.3.2(2) of the Foundation Code could generally be deemed to be satisfied if the foundation was founded on or socketed directly into categories 1(a), 1(b), 1(c), 1(d) and 2 rock.</p>

<p>could be deemed to satisfied if “<i>the foundation rests <u>directly</u> on categories 1(a), 1(b) and 1(d) and 2 rock or if the foundation elements are driven to sound bearing strata with SPT N value ≥ 200”.</i></p> <p>If pile foundation driven to stratum with SPT N value ≥ 200 as stated in the clause is acceptable in fulfilling Criterion (a), with the same principle, common types of deep foundations, such as large diameter bored piles, rock socketed H-piles and rock socketed mini-piles, would deem to meet the above criterion which means no need to check the pile shortening against the maximum total settlement of 30mm. We would like to seek BD’s advice on our understanding.</p> <p>For buildings or structures not particularly sensitive to movement, the following movement criteria, evaluated at the base of a shallow foundation or in case of a deep foundation, the base of pile cap or the equivalent raft level for driven piles, may be used as a reference for developing case specific criteria:</p> <ul style="list-style-type: none"> (a) The maximum total settlement should not exceed 30 mm; (b) The differential settlement between columns/vertical elements should be limited to 1:500; and (c) The maximum angular rotation should not exceed 1:500 due to wind or other transient loads. <p>The above criteria should be assessed based on working loads. For criteria (a) and (b), the dead loads may be reduced to 50%, and the imposed loads may be reduced in accordance with the Code of Practice for Dead and Imposed Loads.</p> <p>In general, criterion (a) could be deemed to be satisfied if the foundation rests directly on categories 1(a), 1(b), 1(c), 1(d) and 2 rock or if the foundation elements are driven to sound bearing strata with SPT N values ≥ 200.</p> <p>Differential settlement should be considered in situations where its evaluation is considered necessary, for example, mixed foundation systems, piles with significant difference in lengths, substantial variation in the properties or depths of compressible strata under the foundations. The differential settlements should be properly controlled or appropriately catered for in the design of superstructure.</p>	<p>Nonetheless, pile shortening and elongation against the maximum angular rotation of 1:500 due to wind or other transient loads should always suffice.</p>
---	--

AOB Items	
14.	<p><u>PNRC 85 on the Fire-retardant Performance of Protective Nets, Screens, Tarpaulins and Plastic Sheeting (Protective Materials) Installed on Scaffolding of External Walls</u> (Item raised by BD)</p> <p>BD introduced the sampling and testing requirements for protective materials to be installed on the scaffolding through promulgation of PNRC 85 on 19 December 2025. The registered contractors should follow the requirements set out in the PNRC 85 to ensure that the protective materials used on sites comply with the recognised standards of fire retardant performance. Prescribed building professionals should diligently exercise their supervisory role under the BO to ensure that appropriate precautionary measures were taken in carrying building works and the materials used were adequately tested by recognised standards.</p>
15.	<p><u>Vote of Thanks</u> (Item raised by BD)</p> <p>AD/NB1 proposed a vote of thanks to Mr LAI Ho-cheong, Alvin, AD/NB2 who co-chaired this Forum for the last time before his retirement.</p>
<p>BD briefed members on the new sampling and testing requirements as well as BD’s site audit arrangement set out under PNRC 85. Members noted.</p>	
<p>Members supported the vote of thanks to Mr LAI and wished him a happy retirement.</p>	