

Summary of Items Discussed in APSEC Discussion Forum (ADF) 3/2025 on 8 August 2025

	Items proposed by Convenors for Discussion	Summary of Discussion and BD's Response
	Items raised by HKIA	
1.	<p><u>Accessible Toilets</u></p> <p>Can fitments in accessible unisex toilets be countable towards the required sanitary fitment provisions for either male or female?</p> <p>Considering two unisex toilets (i.e. one of them being a required accessible toilet) are provided to serve the same floor of a building, please advise whether the two toilets can be regarded as one male toilet and one female toilet when counting the required sanitary fitment provisions.</p>	<p>BD advised that sanitary fitments in accessible toilets could be included for the assessment of provision of sanitary fitments for either male or female person. According to paragraph 12 of PNAP ADV-28, AP should indicate clearly on plans whether such unisex toilets were additional provision or counted as provision for male or female persons with justifications, and BD would favourably consider such proposals taking account of the special circumstances of the case.</p> <p>BD also encouraged practitioners to make use of the Building Information Modelling plug-in tools for automated checking of sanitary fitments provisions, which allowed the choice of counting of such provisions towards either male or female person.</p>
2.	<p><u>Indication of Minor Works Items on Plans submitted for Alteration and Addition (A&A) Works</u></p> <p>After the completion of a new building for which an Occupation Permit (OP) has been granted, it is common for A&A and minor works to be carried out in the building.</p> <p>If such works are to be undertaken with the submission of plans for A&A</p>	<p>BD advised that indication of minor works items on plans would be considered appropriate if such information was an essential part of the proposed A&A works. If such minor works were essential to the proposed A&A works, BD would require the submission of the completion records of such minor works upon the application of consent to the commencement of</p>

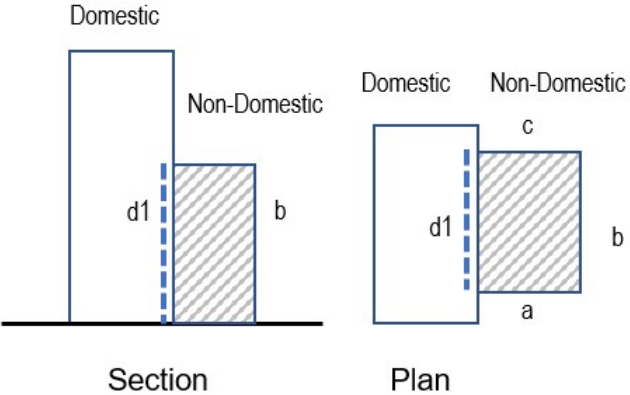
	works, can the minor works that are to be carried out or have already been completed be indicated on the A&A plans for reference and clarity?	such A&A works or the submission of Form BA14.
3.	<p><u>Electrical Sliding Door as One of the Exit Doors in a Room</u></p> <p>For a room with an occupant capacity exceeding 30 persons, a minimum no. of two exit doors are required to be provided according to Clause B7.1 of the Code of Practice for Fire Safety in Buildings 2011 (June 2023 Edition) (FS Code). Will BD accept one of these doors to be an electrical sliding door that could be automatically opened upon actuation of a fire alarm signal or a break glass point and in the event of a power failure?</p> <p>Additionally, as long as the occupant capacity of the room or storey remains below 30, would the abovementioned electrical sliding doors along the exit route be acceptable and considered compliant with Clause B13.1 of the FS Code?</p>	<p>BD advised that automatic sliding doors were considered acceptable under Clause B13.1 of the FS Code if they could open automatically in case of fire or power failure and could be kept open thereafter. However, automatic sliding doors were not acceptable to be provided as the doors to the protected lobby or at the final point of discharge of a required staircase.</p>
4.	<p><u>Code of Practice for Building Works for Lifts and Escalators 2011 (2020 Edition) (Lift Code)</u></p> <p>According to paragraph 3.12.2 of Lift Code, “<i>access for persons to and egress from machine or pulley rooms shall be provided by way of stairs if the difference in levels is greater than 0.6 m</i>”.</p> <p>Our understanding is that the provision of the stair is required if there is a level difference for access to room but do not apply to level difference within the lift machine room where cat ladder is usually provided for</p>	<p>BD advised that apart from the requirement on the provision of access for persons to and egress from lift machine room, paragraph 3.14.4 of Lift Code stated that when the machine room floor comprised a number of levels, differing by more than 500 mm, stairways or steps and guard rails should be provided.</p> <p>BD also reminded that proper maintenance access should be provided from</p>

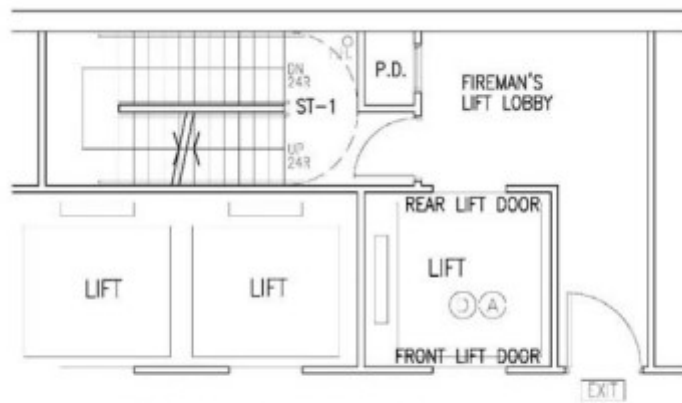
	<p>maintenance access when the level difference is more than 600 mm.</p> <p>Would BD please clarify if our understanding is correct or not?</p>	<p>occupational health and safety point of view.</p>
<p>5.</p>	<p><u>Internal Staircase with Winders serving as Exit Route within Duplex Unit</u></p> <p>Clause B14.2 of the FS Code stipulates that required staircases should be arranged in straight flights without winders.</p> <p>In the case of an internal staircase within a duplex unit, where no required staircase is provided on the upper floor and the internal staircase serves as the exit route discharging to a required staircase on the lower floor, would the inclusion of winders in this internal staircase be acceptable, provided that the requirements on travel distance are met?</p>	<p>BD advised that item 13 of ADF 1/2016 on 15.1.2016 was still pertinent. Internal staircase within the duplex unit was required to comply with regulation 39 of the Building (Planning) Regulations (B(P)R) if there was no other access to the upper floor of the duplex. Winders at internal staircase were required to comply with the dimensional requirements stipulated in regulation 39(3)(c) of the B(P)R.</p>
<p>6.</p>	<p><u>Rooms Containing Soil Fitments – Regulation 36(2) of the B(P)R</u></p> <p>According to PNAP APP-98, application for modification of regulation 36 of the B(P)R is required for internal bathrooms and lavatories in domestic buildings. Since regulations 36(2)(a) and (b) of the B(P)R are separate provisions for lighting and ventilation respectively, we would like to seek BD’s advice if the modification could be applied to either one of the provisions.</p>	<p>BD advised that the concerned modification of regulation 36 of the B(P)R could be applied to either the lighting or ventilation requirement.</p>
<p>7.</p>	<p><u>Mobile Access Facilities (MAF) – PNAP APP-84</u></p>	

<p>According to paragraph 3 and footnote 2 of the September 2024 revision of PNAP APP-84, any “specified buildings” shall be provided with telecommunications and broadcasting (TBE) rooms for the mobile network operators (MNOs) to place and maintain mobile communication facilities. The new requirements for mobile radio communications services will apply to new or major revision of general building plans (GBP) of specified building approved on or after 1 April 2025. The relevant Mobile Access Facilities (MAF), which comply with the size requirements as stipulated in Appendix D to the said PNAP will be disregarded from gross floor area (GFA) calculation.</p> <p>We note that it is BD’s intention to facilitate the expansion of the 5G network coverage, therefore, if the approval of GBP of a new building was obtained before 1 April 2025, can the area of MAF provided be disregarded from GFA calculation?</p>	<p>BD advised that according to paragraph 3 of PNAP APP-84, the Telecommunications (Amendment) Ordinance 2024 was enacted to amend section 14 of the Telecommunications Ordinance so that MNOs were granted access right to place and maintain MAF in specified buildings. As no such access right was granted to non-specified buildings, the area of MAF should be included in GFA calculations if the approval of new or major revision of GBP of a building was obtained before the said date.</p>
<p>8. <u>Requirements of Guard-rails or Maintenance and Repair</u></p> <p>Paragraph 1.4 of Part 3 of the Code of Practice on Access for External Maintenance 2021 (2024 Edition) (AfEM Code) states that:</p> <p><i>“Where there is a risk of fall from a height of 2 m or more, guard-rails and toe-boards shall be provided to comply with the occupational safety requirements set out in paragraph 4(a) and (b) of Appendix D unless a protective barrier in accordance with sections 37 and 38 of the B(C)R is provided. Guard-rails should be of suitable and sound materials of</i></p>	<p>BD advised that protective barriers which comply with the dimensional requirements set out in paragraph 4(a) and (b) of Appendix D to AfEM Code would be acceptable.</p>

<p><i>sufficient strength and capacity, and should be designed to resist the imposed loads and wind loads, where appropriate.”</i></p> <p>Paragraph 4(a) and (b) of Appendix D to AfEM Code set out the requirements of the guard-rails and toe-boards as follows:-</p> <p><i>“(a) Top guard-rail with a height of not less than 900 mm and not more than 1150 mm and intermediate guard-rail with a height of not less than 450 mm and not more than 600 mm</i></p> <p><i>(b) Toe-board with a height of not less than 200 mm”</i></p> <p>It is our understanding that the descriptions of guard-rails in Appendix D set out the major components of a guard-rail, and are for reference only. Other designs of guard-rails, such as solid walls, vertical bars, or glass balustrades, that fulfill the requirements of top guard-rails and toe-boards are also acceptable to BD.</p> <p>Please confirm if our understanding is correct.</p>	
<p>9. <u>Fittings shown in Dotted Lines on GBP</u></p> <p>Further to item 29 on ADF 4/2024 held on 22 November 2024, would BD please clarify whether it is acceptable for kitchen cabinet inside enclosed kitchen or open kitchen to be shown in dotted lines on GBP, and that such cabinets are not required to be installed upon the application for OP of the building.</p>	<p>BD advised that if the provision of kitchen cabinets was essential for the compliance with the relevant requirements/conditions (e.g. cooking slabs forming part of kitchen cabinets to be provided under regulation 45(3)(a) of the B(P)R), such kitchen cabinets should be shown in solid lines on GBP and completed before the application for OP of the building. In other</p>

		words, kitchen cabinets not required under the BO might be shown in dotted lines on GBP for information only.
10.	<p><u>Overall Thermal Transfer Value (OTTV) Calculation</u></p> <p>For special building design with the enclosing walls of the domestic block and the non-domestic block attached to each other as illustrated in the below diagram, we would like to seek BD’s clarification on the method of OTTV calculation.</p> <p>As for the elevations of the non-domestic block, in the case where a portion of enclosing wall is adjoining the enclosing wall of the adjacent domestic block without external face, for calculation of OTTV of the non-domestic block, please advise if the adjoining wall indicated in blue dotted line in the below diagram shall be considered as “notional external wall with 100% shading” for OTTV calculation.</p>	<p>BD advised that according to paragraph 4.2 of the Code of Practice for Overall Thermal Transfer Value in Buildings 1995 (OTTV Code), an external wall of a building which was a party wall should be included in OTTV calculations whether an adjoining building existed or not, and shading to such party wall from adjoining buildings should not be considered in calculating the OTTV. Reference should be made to the sample of OTTV calculations given in Appendix A to the OTTV Code, in which the party wall was included in the OTTV calculations.</p>

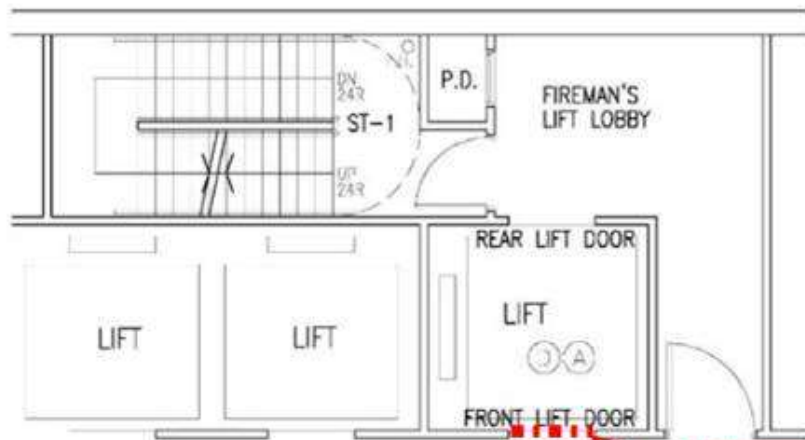
	 <p>Fig. 1</p>	
<p>11.</p>	<p><u>Fireman’s Lift and Fireman’s Lift Lobby</u></p> <p>Item 10 of ADF 4/2015 held on 28 August 2015 showed the below diagram regarding the arrangement of fireman’s lift and fireman’s lift lobby, in which a front/rear-opening elevator is used as a fireman’s lift with the front door lift facing the passenger lift lobby and the rear lift door facing the fireman lift lobby.</p>	<p>BD advised that according to Clause D11.1 of FS Code, every point of discharge from a fireman’s lift to the floor served should be through a lobby. Taking into account FSD’s advice, BD advised that the proposed arrangement was considered not acceptable.</p>



PASSENGER LIFT LOBBY
PRIVATE RESIDENTIAL FLAT AREA, OR
OPEN PLAN OFFICE AREA

According to the summary of discussion of the item, the arrangement as shown in the above diagram would no longer be acceptable to the Fire Services Department (FSD) unless the lobbies which the firemen's lifts open to are firemen's lift lobbies complying with Clause D11.1 and D11.4 of FS Code.

Please advise whether the arrangement shown in the below diagram, with the provision of an automatic fire shutter with an FRR of -/120/120 in front of the front lift door to separate the fireman's lift from the passenger lift lobby in case of fire, is considered acceptable to BD and FSD.



Automatic Fire Shutter in front of the lift door

12. **Means of Access for Roof/Flat Roof**

According to item 13 of ADF 1/2012 held on 6 January 2012, fire escape staircases were required for flat roofs with designated uses and such flat roofs used as licensed areas for Open Seating Accommodation and Places of Public Entertainment were also subject to the control of travel distance controls.

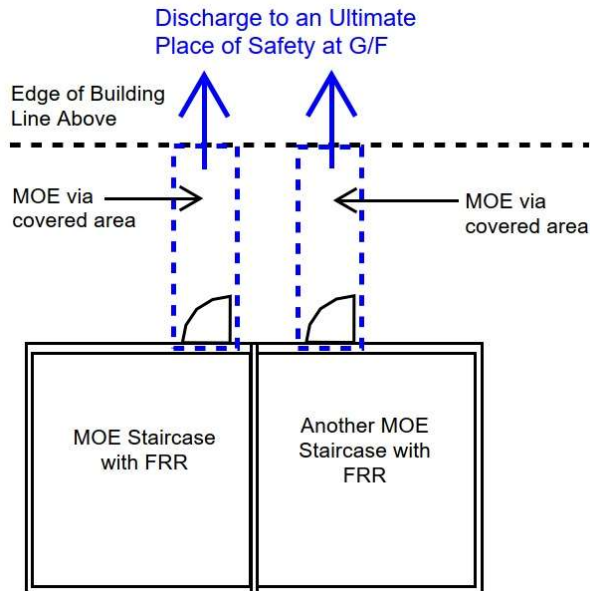
Regarding the requirement set out in Clause D8.4 of FS Code that no part of the floor served by a fireman's lift should be more than 60 m from the door of the lift lobby measured along actual passages, unlike means of

BD advised that the requirement under Clause D8.4 of the FS Code was applicable to any part of a floor served by a fireman's lift, including flat roofs with designated uses. In this regard, the concerned licensed areas at the flat roofs were required to comply with such requirement.

	<p>escape, we understand that this requirement does not apply to flat roofs used as licensed areas for Open Space Seating Accommodation and Places of Public Entertainment, as these areas are open to the sky and present an relatively low fire risk.</p> <p>Could the BD please confirm whether our understanding is correct?</p>	
13.	<p><u>TBE Room for Buildings other than the Specified Building in Regulation 28A of the B(P)R</u></p> <p>Regulation 28A of the B(P)R specified that the below 4 types of building shall be provided with access facilities for telecommunications and broadcasting services:</p> <ul style="list-style-type: none"> (a) Commercial buildings; (b) Industrial buildings; (c) Residential buildings (excluding buildings for residence of a single family); and (d) Hotel buildings <p>The plant room accommodating such telecommunications and broadcasting service (e.g. the TBE Room) may be considered as essential plant room and the GFA may be disregarded under regulation 23(3)(b) of the B(P)R.</p> <p>The telecommunications services such as telephone, facsimile, network data and wideband multimedia services are indispensable in the modern society and the continuous development of a smart city. It is very common that</p>	<p>BD advised that TBE rooms proposed in other types of buildings covered by the said Code (e.g. hospital, universities, etc.) were not considered as essential plant rooms under the B(P)R and hence the concerned areas should be included in GFA calculations.</p> <p>That said, BD would consider reviewing the grant of GFA concessions for TBE rooms in such buildings.</p>

	<p>the provision of TBE Room are provided for buildings other than the buildings specified under regulation 28A of the B(P)R to facilitate the provision of telecommunications and broadcasting services for the buildings.</p> <p>The Code of Practice for the Provision of Access Facilities in Buildings for the Supply of Telecommunications and Broadcasting Services published by the Communication Authority also covers other types of buildings, such as campus-type buildings (e.g. Hospital, universities etc), according to paragraph 1.2 of the Code, which is extracted below:</p> <p>1.2 The following types of buildings are covered in this COP —</p> <ul style="list-style-type: none"> (a) Office and Commercial Buildings; (b) Residential Buildings; (c) Hotels; (d) Dwelling Houses; (e) Industrial Buildings (e.g. warehouses, factories, manufacturing buildings); and (f) Campus-Type Buildings (e.g. hospitals, universities). <p>Therefore, would BD consider reasonably sized TBE Room for buildings other than the buildings specified under regulation 28A of the B(P)R, as non-essential plant room or amenity feature that is desirable to improve the standard and quality of a building or a development project, and exempt the area of such room from the calculation of GFA?</p>	
14.	<p><u>Covered Exit Route at Ground Storey</u></p> <p>According to Item 8 of ADF 1/2025 held on 14 February 2025, BD</p>	<p>BD advised that according to Clause B5.7 of FS Code, the walls enclosing</p>

confirmed that item 9 of ADF 2/2012 held on 16 March 2012 was still pertinent, that “the design of the ground storey discharge point which is recessed from the ultimate edge of the building may be acceptable if the covered recessed area is a common area, open in design, and not encumbered with features carrying fire hazards.”. On such basis, as illustrated in the below diagram, would BD please advise if the covered exit route leading from a required staircase to the ultimate place of safety at the ground storey can be located in proximity of the covered exit route leading from another required staircase, including that serving the basement.



the required staircase illustrated in the diagram should be returned along the frontage of final discharge for a distance of not less than 450 mm wide. The proposed design as illustrated in the diagram might be acceptable on case basis if the covered recessed area was a common area, open in design, not encumbered with features carrying fire hazards, and provided with a separating distance of not less than 450mm between the two notional exit routes.

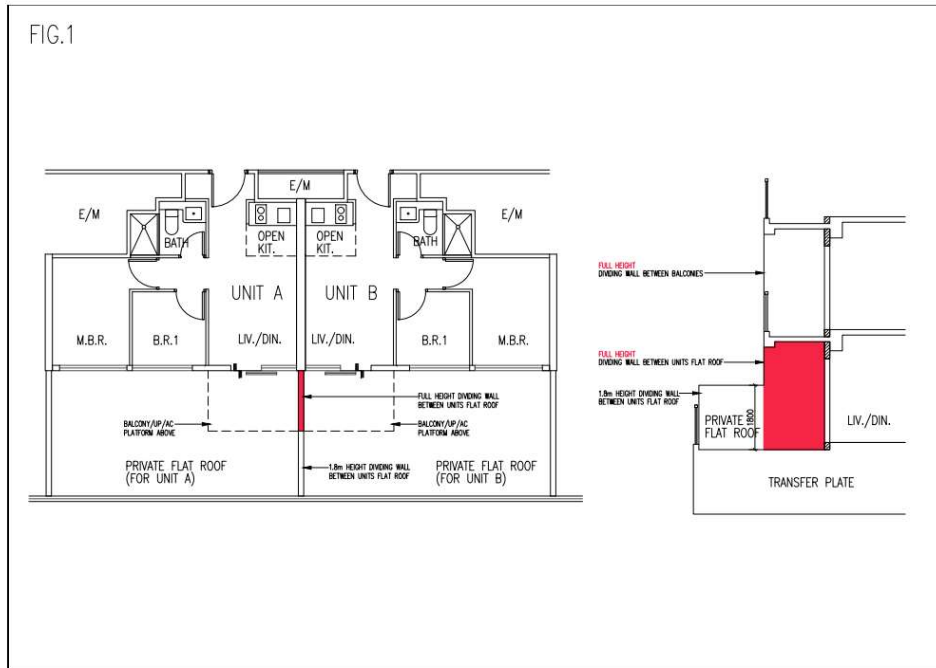
15. **Minor Amendments – PNAP ADM-19**

According to PNAP ADM-19, AP/RSE/RGE can submit an application for

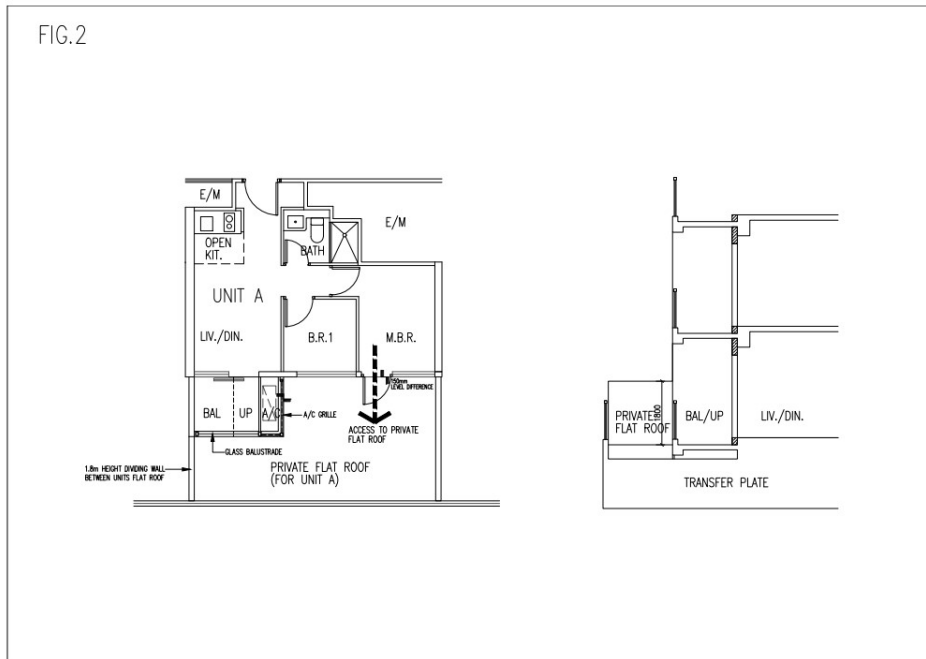
BD advised that for (1), the modification would generally be granted

<p>modification of regulation 33(1) of the Building (Administration) Regulations (B(A)R) after obtaining the first consent or simultaneously with the application for the first consent in respect of the specific type of works for the deferred submission of minor amendments.</p> <p>Would BD please clarify the following: -</p> <p>(1) In the case of submitting the application simultaneously with the application for the first consent, whether the consent application would be processed and the modification would be granted simultaneously with the consent; and</p> <p>(2) If not, or in the case of submitting the application for the modification/exemption after the obtaining the first consent, please advise the processing time of the application.</p>	<p>concurrently with the first consent.</p> <p>BD advised that for (2), although there was no statutory period for the processing the application for modification of the said regulation, BD would endeavour to process the application within the period of 28 days as stipulated under regulation 32(3) of the B(A)R in respect of the application for consent to commence works.</p>
<p>16. <u>Private Flat Roof of Residential Units at the Lowest Storey</u></p> <p>For private residential development, it is quite common that the residential units located at the lowest storey (i.e. immediately above the transfer plate) are designed with access to the adjoining private flat roofs pertaining to the respective units. We understand that it is acceptable for the covered portion of such private flat roof which are underneath the balcony/UP (or combined balcony/UP/AC platform) of the unit above be separated from the private flat roof of the adjoining unit by a full height wall, similar to the separating wall between balconies/UPs (or combined balconies/UPs/AC platforms) of adjoining units (Figure 1 below refers). Please advise if our understanding</p>	<p>BD advised that HKIA's understandings illustrated in both figures were correct provided that the lowest balcony at Figure 2 was cantilevered and adequate access for maintenance to the soffit of the lowest balcony at Figure 2 was provided.</p>

is correct.



In case the residential unit located at the lowest storey is designed with balcony/UP (or combined balcony/UP/AC platform), it is also acceptable for the adjoining flat roof be designated as private flat roof pertaining to such unit, providing that such private flat roof could not be accessed through the balcony/UP (or combined balcony/UP/AC platform) (Figure 2 below refers). Please advise if our understanding is correct.



Items raised by HKIE

17. **Temporary Replacement of Technically Competent Person (TCP)**

When a TCP needs to be temporarily replaced for a period within 2 weeks in the supervision plan (SP), it is our usual practice to submit the curriculum vitae of the proposed acting TCP together with a covering letter specifying the period of temporary replacement. Recently, a GEO officer opined that a revised SP was required for such temporary replacement of TCP. Would BD please clarify whether submitting a revised SP is necessary for short-term temporary replacement of TCP?

BD advised that in accordance with sections 8 and 9 of the Technical Memorandum for Supervision Plans 2009, the AP, RSE, RGE and AS, as the case may be, should submit a revised supervision plan to the Building Authority within 7 days of the temporary replacement of TCP and make proper entry of such replacement in the site register.

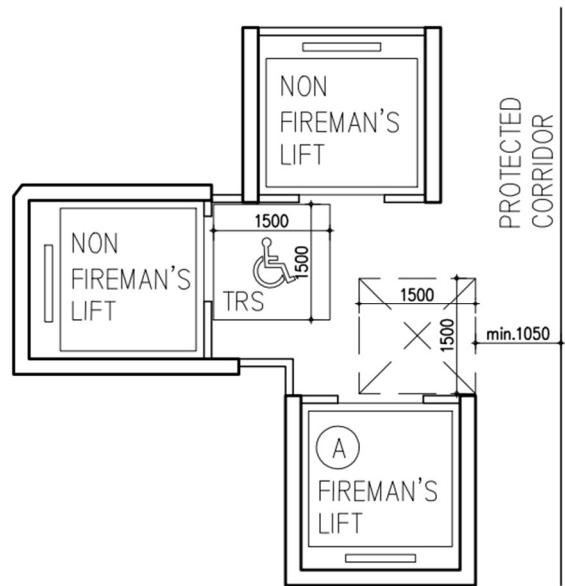
BD reminded that proper record should be made to ensure traceability of TCP at a particular point of time. BD would consider reviewing whether

		<p>a letter from the AP/RSE/RGE/AS enclosed with a duly signed Annex to SP indicating the temporary replacement of TCP is acceptable.</p> <p>[Post-meeting note: AP/RSE/RGE/AS was required to submit the revised part of the supervision plan together with the duly signed Annex to SP for the temporary replacement of TCP under the respective stream.]</p>
18.	<p><u>Minor Amendment Submission to be Approved Prior to Application for OP</u></p> <p>In situations where a minor amendment submission is needed to correct typographical errors on the approval plan during the document checking process of Form BA13 submission, we have been advised that the submission and approval dates for the minor amendment must precede that of the Form BA13 submission. This necessitates the withdrawal of the submitted Form BA13 which can only be re-submitted after the approval of the minor amendments. Would BD consider permitting Form BA13 to be submitted in tandem with the submission and approval of a minor amendment if it does not involve any physical work?</p>	<p>BD advised that according to paragraph 3 of PNAP APP-13, AP/RSE/RGE should submit and secure approval of amendment plans in advance of an application for OP, subject to the exception that minor positional deviations from the approved plans which do not contravene the Buildings Ordinance (BO) and its subsidiary regulations might be acceptable.</p> <p>BD also advised that according to paragraph 31 of PNAPADM-19, AP, RSE and RGE were required to ensure that approval and consent for all these amendments were obtained prior to certifying completion of the building works or applying for an OP, such that the date of completion of works entered on the Form BA13 would not precede the date of approval of the latest approved plans.</p>
19.	<p><u>Submission of Record Plans for Form BA14 for Pile Cap Works</u></p> <p>For the submission of Form BA14 for pile cap works, it is often required to submit record plans for the pile cap works which are replication of the</p>	<p>BD advised that the submission of Form BA14 and record plans was not a condition imposed in the approval letter for pile cap works, and BD had no</p>

	<p>approved pile cap plans. Would BD please confirm that the submission of such pile cap record plans is not necessary as the BO requires works to be carried out according to the approved plans.</p>	<p>view on the submission of Form BA14, whether supplemented by record plans or not, for the completion of pile cap works.</p>
<p>20.</p>	<p><u>Acceptance of Earlier Concrete Cube Strength for Acknowledgement of Form BA14 or Grant of OP</u></p> <p>According to paragraph 10 of BD’s Circular Letter dated 31 March 2025 on Further Streamlining Measures for Foundation Works, upon receipt of a Form BA14 regarding completion of foundation works, the justification of concrete strength requirement by test cube results taken before 28 days may be acceptable by BD for the selection of representative piles for proof tests if the essential information as required in the approval of foundation plans has been submitted and found satisfactory.</p> <p>For the submission of Form BA14 or BA13 for building project, the availability of the final batch of 28-day concrete cube test results may not be ready at the time of submission. If the required strength could be achieved before 28 days after concrete mixing, further concrete cube tests at 28 day would increase construction cost and time.</p> <p>Would BD consider accepting the 7-day or 14-day concrete cube test results for the acknowledgment of Form BA14 or grant of OP, if the cube strength meets or exceeds the required 28-day strength stipulated under Clause 10.3.4.2 of Code of Practice for Structural Use of Concrete 2013 (2020 Edition) (Concrete Code)?</p>	<p>BD advised that the streamlining measure promulgated in BD’s Circular Letter dated 31 March 2025 to accept early concrete/grout cube strength test results as the essential information of the RSE’s certification of completion of foundation works aimed to facilitate BD’s selection of pile(s) for proof load tests, thus expediting the construction process. In addition to fulfilling the requirement on characteristic concrete strength, other quality control requirements as specified in the clause 10.3.4.2 of Concrete Code and Construction Standard CS1, such as the mode of failure, statistical analysis, etc., which referred to concrete in maturity (28-day age) under widely adopted international standards for verifying the long-term performance of concrete, should also be complied with. While the streamlining measure on the submission of Form BA14 for foundation works was adopted, RSE were still required to submit the 28-day concrete cube strength test results at later stage for BD’s processing prior to acknowledgement of completed foundation works.</p>

<p>21.</p>	<p><u>Self-certification System for Plan Submission of Simple Structural Works – PNAP ADM-23</u></p> <p>PNAP ADM-23 promulgates measures to streamline the development process by introducing a self-certification system with fast track processing procedures for plan submissions of five categories of simple structural works in <i>new building development</i>. According to paragraph 11 of the said PNAP, concurrent applications for approval and consent can be processed provided that approval of corresponding building plans has been given.</p> <p>Would BD consider to extend the scopes of Categories B and C works (e.g. metal/glass cladding, false ceiling, louvre & grille; metal frame supporting building service installation including TV monitor & ceiling lightings etc. in shopping arcade), which are simple and minor structural works, to A&A submissions for fast track processing to support economic growth?</p>	<p>BD advised that PNAP ADM-23 aimed to introduce a fast-track plan processing system for structural works which were relatively simple in nature to facilitate the construction process.</p> <p>The self-certification system for Categories B and C works, which were simple structural works involving mainly the erection of secondary structural elements in a new building development, was introduced on the grounds that the project RSE had an extensive understanding of the structural layout and conditions of the development, compared to A&A works in existing buildings which required the appraisal of the existing structural conditions and the feasibility of works.</p> <p>Since the promulgation of the self-certification system for plan submission of simple structural works on 30 June 2025, BD had received several plan submissions requesting for self-certification in July 2025. BD would collect feedbacks from the building practitioners on the application of such fast-track plan processing system and review its effectiveness/efficiency prior to reconciling the system and considering an expansion of the scope to cover more structural works in the future.</p>
<p>Items raised by AAP</p>		
<p>22.</p>	<p><u>Temporary Refuge Space (TRS) at Lift lobby</u></p> <p>Clause B30.1 of the FS Code requires that “<i>at least one temporary refuge</i></p>	<p>BD advised according to Clause B16.1 of the FS Code, every lift lobby</p>

space with an area of not less than 1.5 m x 1.5 m should be provided within the protected exit or fireman's lift lobby" and such space should not reduce the minimum area of a fireman's life lobby. In some proposed developments as illustrated in the below diagram, the space of fireman's lift lobby is so limited that the TRS can only be placed in front of the doors of other lifts which are not designated as fireman's lifts. Could BD advise if such arrangement is acceptable?



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. As such, the proposed arrangement of the TRS in the diagram causing an obstruction to the access of the lift lobby was not acceptable.

Items raised by ACEHK

23. **Supporting Structure of Tower Crane**

Further to item 17 of ADF 4/2024 held on 22 November 2024 and item 14 of ADF 2/2025 held on 9 May 2025, would BD please clarify whether 50-year return period wind speed as specified in the below tables shall be adopted for both “in-service condition” and “out-of-service condition”, noting that from practicality point of view, tower crane will normally cease operation during adverse weather condition.

For tower crane remains in position for more than one year:

Condition	Design wind load
In-service condition (tower crane in operation)	Wind pressure under 50-year return period
Out-of-service condition (tower crane not in operation under adverse weather, e.g. tropical cyclone warning signal no. 8 is hoisted)	Wind pressure under 50-year return period

For tower crane remains in position for NOT more than one year:

Condition	Design wind load
In-service condition (tower crane in operation)	0.7 x Wind pressure under 50-year return period
Out-of-service condition (tower crane not in operation under adverse weather, e.g. tropical cyclone warning signal No.8 is hoisted)	0.7 x Wind pressure under 50-year return period

24. **Separate RSE for Cladding/Curtain Wall/Façade Works**

Under PNAPs APP-16 and APP-37, separate RSE may be appointed to

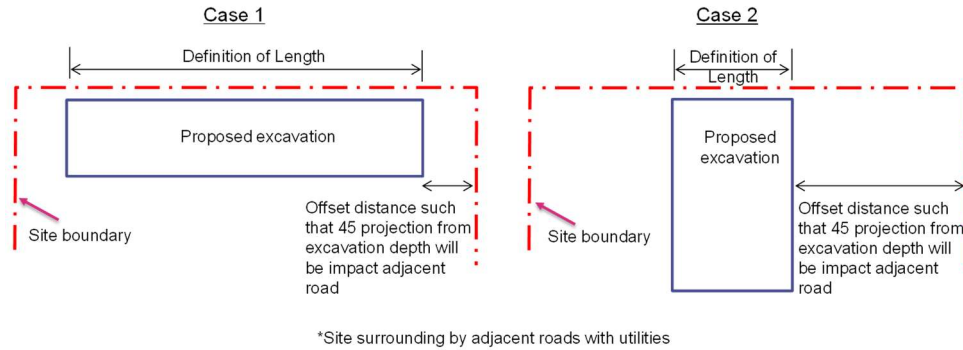
BD advised that item 17 of ADF 4/2024 and item 14 ADF 2/2025 were still pertinent. The design wind load for the supporting structure of tower crane in both in-service and out-of-service conditions should comply with the requirements as stipulated in Clause 2.5 of the Code of Practice on Wind Effects in Hong Kong 2019 (Wind Code).

For tower crane that would remain on site for one year or longer, full design wind loads, i.e. 100% of design wind load for permanent buildings, should be adopted for the design of tower crane supporting structures and connections in both in-service and out-of-service conditions. If the tower crane supporting structure was expected to remain in place for not more than one year, the supporting structure might be designed for a minimum of 70% of the design wind load for permanent buildings. Even though the tower crane would not be operated when the tropical cyclone warning signal No. 8 was hoisted, the design wind pressure for the tower crane supporting structure should comply with Clause 2.5 of the Wind Code.

BD advised that the project AP/RSE/RC should sign the Form BA13 to

<p>prepare the design and supervise cladding, curtain wall, window and window wall works. In the submission of Form BA13, only one RSE is required to certify the completion of buildings works on such form. Would BD please clarify if the separate RSE for curtain wall/façade/cladding works is allowed to certify the completion of the respective works on the same Form BA13.</p>	<p>certify the completion of building works resulting in a new building and to apply for the OP of such building.</p> <p>According to paragraph 6 of PNAP APP-16, paragraph 10 of PNAP APP-37 and paragraph 11 of PNAP APP-143, for cladding, curtain wall, window and window wall and precast concrete elements works which were designed and supervised by a separate RSE, the separate RSE was required to certify the completion of such works in accordance with regulation 25(3) of the B(A)R by the submission of Form BA14.</p> <p>On account of a member’s enquiry, BD advised that separate TCPs under the separate RSE’s stream could be appointed for the supervision of the said works.</p>
<p>25. <u>Criteria for Submission of Excavation and Lateral Support (ELS) Plans</u></p> <p>Paragraph 3 of PNAP APP-57 is extracted as follows:</p> <p>3. ELS plans will be required to be submitted to the Buildings Department (BD) for approval where the excavation works to be carried out are:</p> <ul style="list-style-type: none"> (a) deeper than 2.5 m and greater than 5 m in length; and (b) liable to affect any road, building, structure, slope steeper than 30° or water main 75 mm in diameter or greater, the affected area being defined as within the 45° line up from the base of the excavation to the ground surface. <p>According to item 18 of ADF 4/2022 held on 12 August 2022, our understanding is that ELS plans are only required when both conditions</p>	<p>BD advised that ELS plans were required to be submitted for approval when both criteria in paragraph 3(a) and (b) of PNAP APP-57 were met. The length of the excavation in paragraph 3(a) should refer to the single maximum dimension of the entire excavation area on the plan, irrespective of the construction sequence and/or proximity to the site boundary. As a result, ELS plans were required to be submitted to BD for approval for the excavation works illustrated in the diagrams.</p> <p>On account of a member’s opinion that the greatest dimension of the excavation in Case 2 illustration diagram was further apart from the site such that the requirement for ELS submission might be relaxed, BD would</p>

under paragraphs 3(a) and 3(b) of the said PNAP are met. We have a follow up query on the definition of length as stated in sub-clause (a), whether it refers to the length of excavation parallel to site boundary, irrespective to maximum or least dimension on plan of a rectangular-shaped excavation, as illustrated in the below diagrams:



An excavation of a long narrow trench to house utilities, say 20 m by 3 m wide by 3 m deep, is to be carried out near the site boundary abutting a public road. Based on the construction sequence, the trench will be opened in sections in order to maintain site traffic, such that in each section a maximum length of 5 m will be excavated and then backfilled before the next section is commenced. If the answer to the above query is affirmative, our understanding is that such excavations works would not require the submission of ELS plans to BD for approval. Would BD please confirm if our outstanding is correct?

further review the criteria.

[**Post meeting note:** In response to member’s opinions, BD conducted a further review of the criteria in paragraph 3(a) and (b) of PNAP APP-57, BD considered that the length of the excavation in paragraph 3(a) should refer to every single dimension of the entire excavation area with a length greater than 5m, irrespective of the construction sequence and/or proximity to the site boundary.]

Items raised by AREC

26. **Load Effects from Temperature Change**

<p>According to Clause 2.5.6 of the Code of Practice for the Structural Use of Steel 2011 (2023 Edition) (Steel Code), it states that:</p> <p><i>“Where, in the design and erection of a structure, it is necessary to take into account of changes in temperature, it may be assumed that in Hong Kong, the average temperature varies from +0.1 °C to +40.0 °C.”</i></p> <p>Would BD please advise if the thermal load shall be applied for the area that is exposed to weather/direct sunlight only or for the entire steel structure including the fully enclosed area.</p>	<p>BD advised that according to the Steel Code, temporary effects on the entire steel structure should be considered, particularly for external frames exposed to weather or direct sunlight during the erection on site, as they experience larger temperature gradients. The actual range of temperature considered in the design depends on the location, type and purpose of the structure.</p> <p>For steel structure which were partially exposed outside or under sunlight, temperature load with reduced intensity might be considered on case basis taking into account the degree of exposure, design assumption of connections and engineering judgement.</p> <p>For the design of glass and façade supporting structure, temperature range for local design should follow the requirements given in Clause 13.3.4.3 of the Steel Code.</p>
<p>27. <u>Drill-in Anchors for Fall Arrest System</u></p> <p>Paragraph 3 of Appendix F to the Code of Practice on Access for External Maintenance 2021 (2024 Edition) states that <i>“if drill-in anchors for anchoring the fall arrest devices are proposed for alteration and addition (A&A) works to an existing building, an assessment¹ on the structural viability of the works should be submitted together with the structural plan.</i></p> <p><i>¹ For A&A works in existing buildings, reference should be made to PNAP APP-117.”</i></p> <p>In the case of new building works, does BD accept drill-in anchors for fall arrest system to be installed on precast façades that have been erected on</p>	<p>BD advised that drill-in anchors for fall arrest system to be installed at external reinforced concrete walls might be acceptable, provided that relevant codes of practice and/or international standards were complied with. Conditions on testing requirements might be imposed on approval of relevant plans.</p> <p>BD also reminded that the Guidance Notes on Classification and Use of Safety Belts and their Anchorage System issued by the Labour Department should be observed.</p>

	site?	
AOB Items		
28.	<p><u>Requirement of Signed Statement by Authorised Signatory (AS) upon Submission to RSE</u> (Item raised by HKIE)</p> <p>In the letter of approval of structural submissions issued by BD, standard conditions and requirements are often imposed in the appendix to the letter, for example as extracted below for Reinforced Concrete Works (SE-SA1 (4-2022)), RSE is required to sign a statement to confirm that the test reports of material are in in accordance with approved plans, in compliance with the requirements in the Concrete Code, etc. It however does not specify the requirement for the AS appointed by the registered contractor (RC) to do the same. Some AS refuse to sign and confirm the same on the relevant documents, but only assigns a “so-called” project manager to sign on them and submit them to RSE for subsequent submission to BD. We consider that it is not appropriate and certainly not the intent of the BD on the control over AS’s duties. We suggest BD amend all the relevant standard conditions and requirements to specify the requirement for AS to sign and confirm the same before submission to the RSE for subsequent submission to BD. Also, it is suggested to review the same for the Code of Practice for Site Supervision 2009, as submissions to AP/RSE are very often specified to be made by RC instead of AS.</p>	<p>BD advised that material tests conducted by independent laboratories aimed to assess the properties and behaviour of the materials in accordance with the design assumptions and standards. As the RSE was responsible for the structural design of the proposed development, he/she was responsible for ensuring and confirming that the materials adopted were suitable for their intended use. That said, BD would consider seeking views from practitioners on HKIE’s suggestions.</p>

Reinforced Concrete Works

In giving this approval of plans, I hereby impose the following conditions under item 6 in section 17(1) of the Buildings Ordinance (BO):

- (a) Sampling and testing of steel reinforcing bars should be carried out in accordance with CS2:2012. Testing should be carried out by a laboratory* accredited under the Hong Kong Laboratory Accreditation Scheme (HOKLAS) for the particular test concerned. Test results^(b) should be submitted within 60 days of the delivery of the steel reinforcing bars to the site^(c). The test reports should be appended with a statement signed by the registered structural engineer (RSE) to confirm the following:
 - (i) All steel reinforcing bars used for the construction and the test specimens covered by the test reports are in accordance with the types and grades of steel shown in the approved plans.
 - (ii) Sampling and testing of steel reinforcing bars used have been carried out in accordance with CS2:2012.
 - (iii) The acceptance criteria appropriate to each type and grade of steel reinforcing bars used have been complied with.
 - (iv) All steel reinforcing bars tests have been carried out by a laboratory* accredited under the HOKLAS.
- (b) Sampling of concrete and compression testing of concrete test cubes should be carried out in accordance with the methods specified in CS1:2010. Testing should be carried out by a laboratory* accredited under the HOKLAS for the particular test concerned. Test results^(b) should be submitted within 21 days after testing. The test reports should be appended with a summary which contains information on locations of concerned structural elements, concrete grades and dates of cast. The summary should also include previous summary information of concrete cube test reports in chronological order. The test reports should also be appended with a statement signed by the RSE to confirm the following:
 - (i) All concrete used for the construction and concrete cubes covered by the test reports are in accordance with the concrete grades shown in the approved plans.
 - (ii) Concrete cube sizes, rates of sampling fresh concrete for testing and acceptance criteria for compressive strength set out in clause 10.3.4.2 of the Code of Practice (CoP) for Structural Use of Concrete 2013 have been complied with.
 - (iii) All concrete cube tests have been carried out by a laboratory* accredited under the HOKLAS and in accordance with the methods specified in CS1:2010.

29. **Smart Site Safety System (4S)**
(Item raised by HKIE)

<p>BD’s Circular Letter dated 31 March 2025 announces that with effect from 1 July 2025, conditions requiring qualified supervision by the adoption of Mobile Plant Alert System and Tower Crane Alert System under 4S for a development project of which the estimated total cost of building works exceeds \$30 million would be imposed under item 6 of section 17(1) of the BO upon granting (a) the first approval of plans or major revision of plans, and/or (b) the first consent to the commencement and carrying out of building works (including demolition works, site formation works, excavation and lateral support works, foundation works, pile cap works and superstructure works) that involve the use of mobile plants and/or tower cranes. The above conditions will also be imposed in granting the first approval and/or the first consent for an alteration and addition project that involves structural works and meets such cost threshold.</p> <p>Could BD confirm that if the consent for superstructure works is granted before 1 July 2025, the adoption of the said two systems under 4S will not be required even if the consent for other structural works (such as secondary structural elements) is obtained after 1 July 2025?</p>	<p>BD advised that the \$30 million threshold referred to the total project cost of the development. If the first consent for superstructure works was already granted before 1 July 2025, unless there were major revision to the approved superstructure works, the adoption of the said two systems under 4S would not be required for non-substantial qualified supervision of the secondary structural elements (e.g. balustrade) of the same project. BD would review whether the requirement would be imposed on substantial secondary structural elements such as curtain wall, if the consent for the superstructure works was already granted before 1 July 2025 but the consent for the works of such substantial secondary structural elements was granted after that date.</p> <p>[Post-meeting note: The subject requirement would not be imposed on substantial secondary structural elements if the consent for the superstructure works of the same project was already granted before 1 July 2025, unless there is major revision to the approved superstructure plans.]</p>
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