

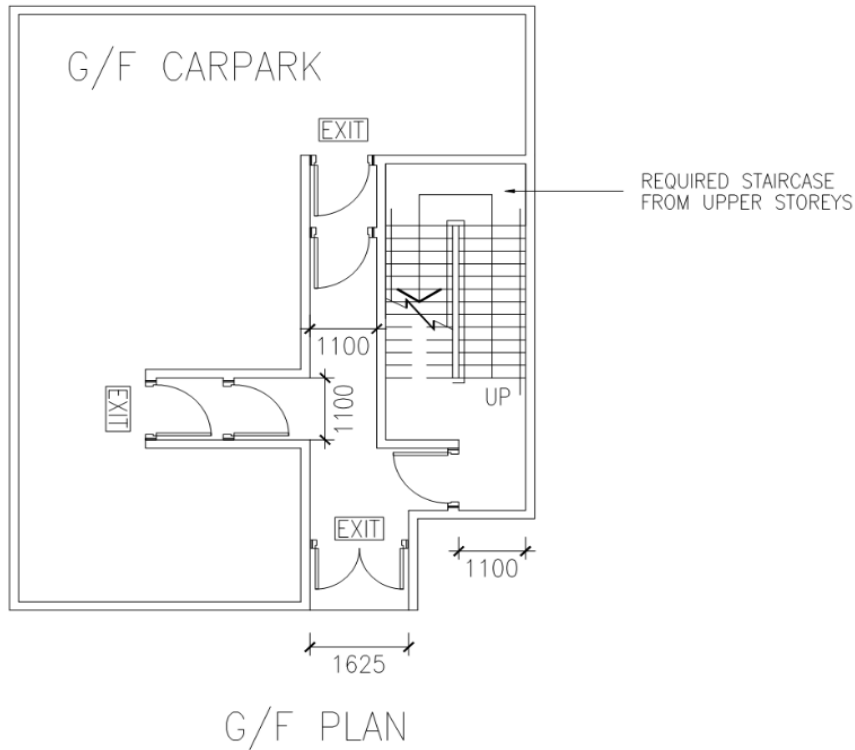
## Summary of Items Discussed in APSEC Discussion Forum (ADF) 4/2025 on 21 November 2025

	Items proposed by Convenors for Discussion	Summary of Discussion and BD's Response
	<b>Items raised by HKIA</b>	
1.	<p><b><u>Code of Practice for Fire Safety in Buildings 2011 (2024 Edition) (FS Code)- Services within Protected Exit</u></b></p> <p>According to Clause C9.3 of the FS Code, services other than emergency services within required staircases and their protected lobbies are required to be enclosed by fire barriers having a fire resistance rating (FRR) not less than that of the walls separating the protected exit from the rest of the building.</p> <p>(a) For plumbing and drainage pipes within the protected exit (not required staircases and their protected lobbies), would BD please advise if the following provisions are acceptable for exemption of enclosure by fire barrier: -</p> <ul style="list-style-type: none"> <li>(i) Water-borne copper pipes enclosed by Class 0 “Armaflex” elastomeric insulation material</li> <li>(ii) Water-borne UPVC flushing water pipes with low flame spread characteristics</li> <li>(iii) Epoxy cast iron drain pipes</li> </ul> <p>(b) Would BD please advise if the above is applicable to Fireman’s lift lobby not forming part of the required staircases, and their protected lobbies?</p>	<p>BD advised that according to Clause C9.3(d) of the FS Code, all non-emergency services within required staircases and their protected lobbies should be enclosed by fire barriers.</p> <p>For openings for building services passing through fire barriers not forming part of the required staircases and their protected lobbies, Clauses C8.2 to C8.6 and other relevant provisions of the FS Code should be fully complied with.</p>

<p>2.</p>	<p><b><u>FS Code - Exit from Rooms and/or Fire Compartment</u></b></p> <p>According to Subsection B7 of the FS Code, it is our understanding that the number of exits from every room shall be determined by the occupant capacity of the room or the fire compartment.</p> <p>Since toilets/lavatories are considered ancillary accommodations without occupant capacity, provision of only one exit will be adequate, irrespective of the size and layout.</p> <p>Would BD please advise if the understanding is correct?</p>	<p>BD advised that the number of exits for large scale toilets/ lavatories should be assessed on case basis to ensure adequate means of escape in case of fire. Nevertheless, apart from Subsection B7 of the FS Code, the number of exits required would also be subject to other requirements under the FS Code such as Subsection B11 on travel distance and Clause D8.4 on floors served by a fireman’s lift.</p>
<p>3.</p>	<p><b><u>FS Code - Exit at Ground Storey</u></b></p> <p>According to Clause B9.2 of the FS Code, an exit route from a ground storey also forms part of the exit route from a required staircase, the width of such exit route should be not less than the sum of half the width required for the exit route from the ground storey and the width required for the required staircase.</p> <p>For cases with multiple exits provided at ground storey leading to the same protected exit, it is our understanding that the required aggregate exit width should not be increased solely based on the number of exit doors provided, provided that:</p> <ol style="list-style-type: none"> <li>1. The exit doors lead from the same room/compartment on the ground storey;</li> </ol>	<p>BD advised that the understanding of HKIA was correct. It was clarified that the occupant capacity of the car park as shown in the diagram did not exceed 30 persons. However, the minimum width of combined exit route in the diagram should be 1 650mm and measured between the vertical member of the door frame.</p>

2. The total occupant capacity on the ground storey remains unchanged; and
3. The width of the exit route complies with the minimum requirements determined in accordance with Table B2 (minimum exit widths) and Clause B9.2 of the FS Code.

Would BD please confirm if our understanding is correct and the example in the below diagram is acceptable?



4. **Implementation of PNAP APP-151 and GFA concessions under various updated PNAPs**

Paragraphs 6 to 9 of PNAP APP-151 (Sept 2023 Version) describe the pre-requisites for granting GFA concessions, which apply to all new general building plans (GBP) or major revision of GBP approved on or after 30 June 2024.

PNAP APP-151 (July 2025 Version) was further updated with the revised list of GFA concessions in Appendix A to align with the updated version of PNAP APP-42 (Amenity Features) for elderly-friendly design, and new arrangements of GFA concession items, such as provision of better lift service and horizontal screen, etc.

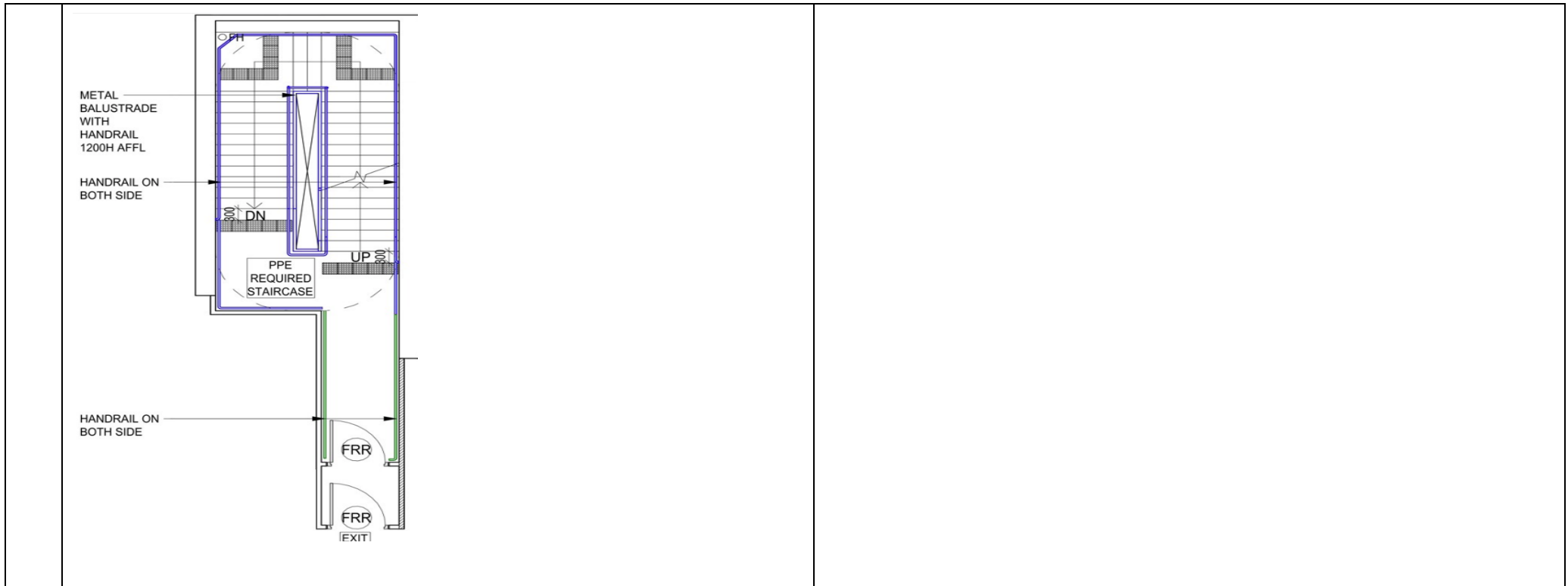
Between September 2023 and July 2025, there were several revised PNAPs for GFA concession items (e.g. PNAP APP-42 regarding amenity features, PNAP APP-19 regarding projections, PNAP APP-89 regarding better Lift services, JPN No. 1 regarding green and innovative buildings, etc.), and all need to comply with the pre-requisites as listed in PNAP APP-151.

Would BD please clarify: -

1. Whether projects with GBP approved before 30 June 2024 can follow the new PNAP APP-151 (July 2025 Version) and the requirements of the new PNAPs for GFA concessions?
2. How about localised major revision of GBP?
3. If not applicable due to current administrative restrictions, is there any

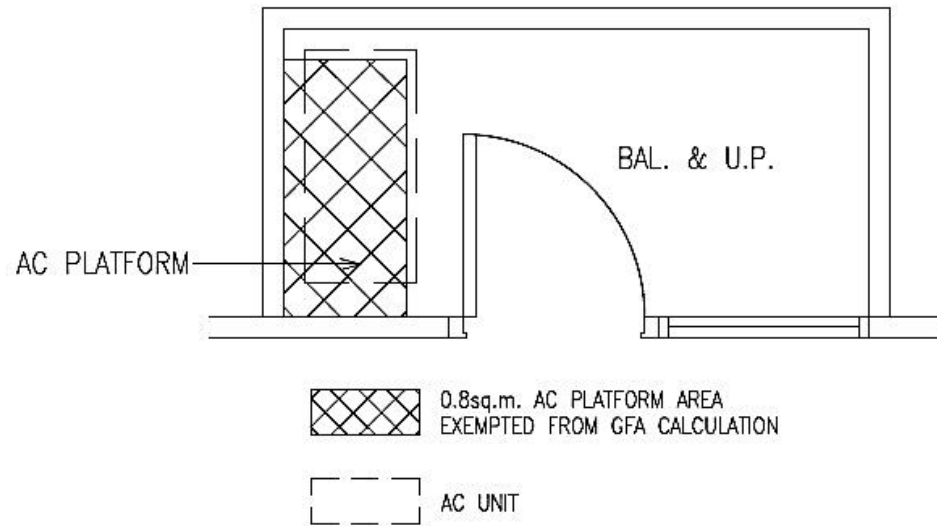
BD advised that the GFA concessions under the recently revised PNAPs APP-19, APP-42, APP-89 and JPN No.1 were applicable to all new buildings with works in progress, including those with GBP approved before 30 June 2024 and/or localised major revision, provided that the pre-requisites under the PNAP APP-151 and relevant acceptance criteria under respective PNAPs were complied with.

	<p>pragmatic approach for projects willing to adopt the new PNAPs requirement for promoting environmentally friendly buildings without submitting a major revision of GBP?</p>	
5.	<p><b><u>FS Code – Handrail on each side of the required staircase</u></b></p> <p>According to Clause B14.6(c) of the FS Code, handrail on each side of the required staircase shall be continuous throughout each flight, but need not be carried round a landing or half landing except in the case of premises of Use Classification 5a.</p> <p>It is our understanding that the handrail highlighted green in the below diagram shall not be required. Would BD please advise if the understanding is correct?</p>	<p>BD advised that the understanding of HKIA was correct. Nevertheless, BD reminded that the provision of staircase handrails should comply with all relevant requirements as stipulated in the Design Manual: Barrier Free Access 2008 (2025 Edition).</p>



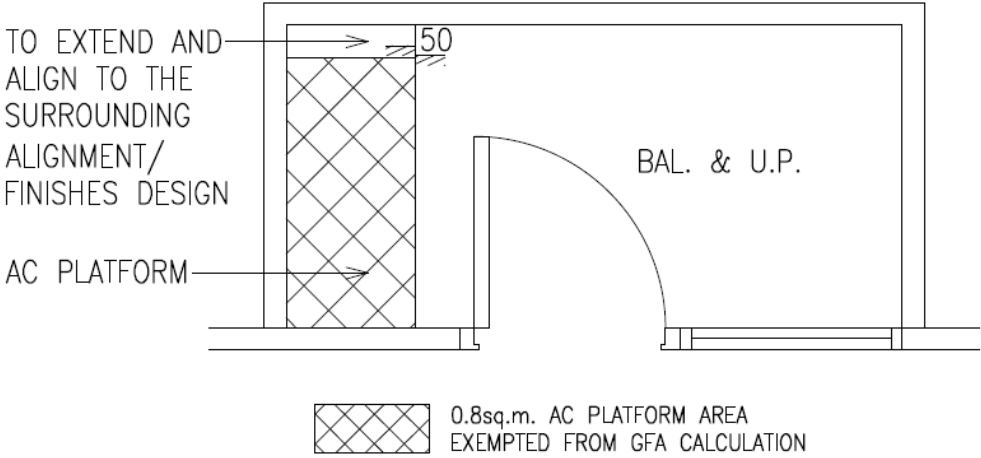
	<b>Items raised by AAP</b>	
6.	<p><b><u>PNAP APP-151 (August 2024 version)</u></b></p> <p>According to paragraph 10 of PNAP APP-151 (August 2024 version), the pre-requisites for granting GFA concessions are applicable to all new GBP or major revision of GBP submitted to the BA for approval on or after 30 June 2024.</p> <p>It is noted building amendment plans recently submitted for the purpose of applying for an extension of time prior to the expiry of the Form BD106 (GBP Renewal Submission), the new time limit imposed will expire on 29</p>	<p>BD advised that in accordance with Annex 1 of BD’s Circular Letter dated 31 December 2012, upon receiving an application for an extension of time (EOT) prior to the expiry of a Form BD106, BA would check whether there is any change in circumstances which may adversely affect the approved proposal.</p> <p>For modification or exemption related to GFA concession of an approved proposal subject to the GFA concessions policy in force before 30 June</p>

	<p>June 2026 (i.e. 2 years from 30 June 2024) which is less than 2 years from the date of renewal.</p> <p>Would BD please clarify whether the PNAP APP-151 (August 2024 version) is applicable to GBP Renewal Submission in view of the amendments involved are mostly very minor in nature.</p>	<p>2024, there was a change in circumstances with the new policy coming into effect on 30 June 2024. A pragmatic approach had been adopted for such application and EOT would be granted not later than 29 June 2026 without the need to examine whether the applicant has shown diligence to obtain the consent to commence the approved works. Further EOT was generally not supported, and may only be considered on a case by case basis as per the principles set out in paragraphs 11 to 13 of Annex 1 of the said circular letter.</p>
7.	<p><b><u>Air-conditioner (AC) platform combined with Balcony / Utility Platform (UP)</u></b></p> <p>According to item (b) of Appendix B to the Code of Practice on Access for External Maintenance 2021 (2024 Edition) , “<i>a minimum of 50mm rise in level from the finished floor of the balcony/UP should be provided in the AC platform</i>”.</p> <p><b>Scenario 1</b></p> <p>To cater for the intake and exhaust systems of some large size AC outdoor unit as found in the market, would BD accept a portion of the AC outdoor unit be positioned outside the prescribed 0.8m<sup>2</sup> AC platform area as shown in the below diagram.</p>	<p>BD advised that both arrangements in Scenario 1 and Scenario 2 were considered acceptable, provided that the AC outdoor unit could be securely installed on the AC platform.</p> <p>For Scenario 2, the remaining portion could be accounted towards the balcony/UP area given that the proposed concession area of the balcony/UP after deducting the 0.8 m<sup>2</sup> of AC platform met the criteria under JPN Nos. 1 and 2. Item 1 of ADF 5/2021 held on 21 November 2021 was relevant.</p>



**Scenario 2**

For ease of construction, would BD accept the extent of AC platform area under Scenario 1 be modified as illustrated in the below diagram in such a way that the entire raised AC platform area becomes larger than 0.8m<sup>2</sup> but only the 0.8m<sup>2</sup> (the cross-hatched portion) will be GFA exempted, the remaining portion is accounted towards the Balcony / UP area.

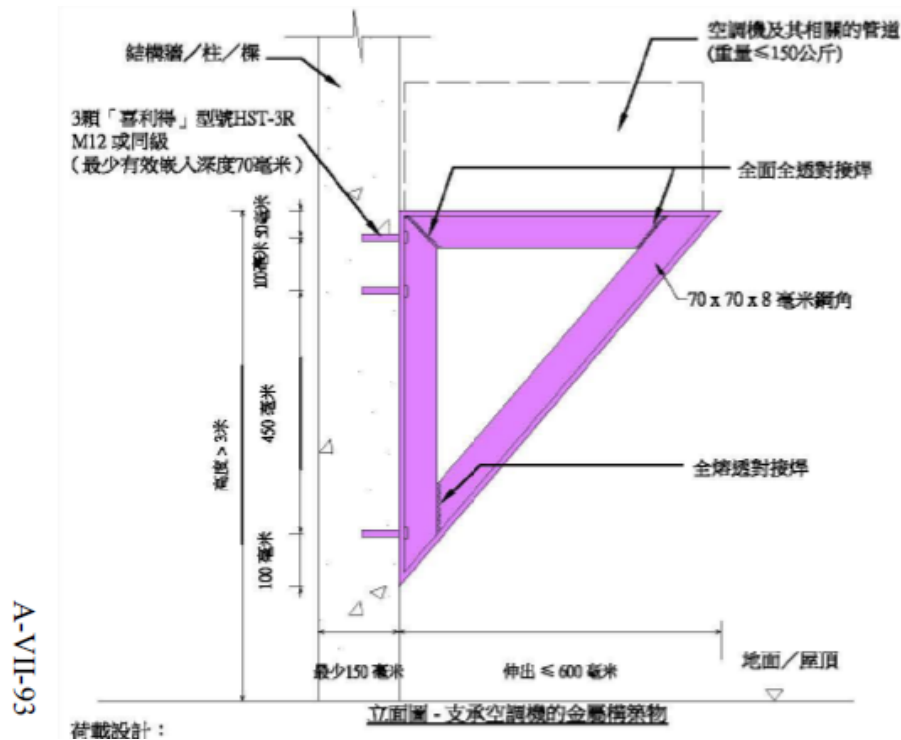
		
<p>8.</p>	<p><b><u>GFA Exemption for better lift service</u></b></p> <p>In accordance with paragraph 5(a) of PNAP APP-89, GFA exemption may be considered for lifts serving domestic accommodation in domestic/composite buildings including hotels.</p> <p>In accordance with paragraph 13(a) of PNAP APP-173, BA may grant exemptions to treat a newly built student hostel under the “Hostels in the City Scheme” (the Scheme) as a non-domestic building for the purposes of site coverage and plot ratio calculations under regulations 19, 20, 21 and 22 of the Building (Planning) Regulations.</p> <p>Would BA advise if GFA exemption for better lift service could also be granted for student hostel under the Scheme similar to hotels.</p>	<p>BD advised that newly built student hostels under the Scheme would be considered as hotels for the purposes of PNAP APP-89, provided that the criteria stipulated in PNAP APP-89 are met, which include the compliance with the pre-requisites under PNAP APP-151.</p>

<b>Items raised by AREC</b>		
9.	<p><b><u>Modification of Temporary Steel Platform for Foundation Works</u></b></p> <p>Under item 7 in section 17(1) of the BO, BD submission of temporary steel platforms to be erected on slopes and/or top of retaining walls including their foundation to support plants and machineries in order to facilitate the foundation construction works are required which makes this kind of temporary steel platforms falls into Case 1 temporary works under Code of Practice for Site Supervision 2009 (2024 Edition).</p> <p>If such temporary steel platform to be partially retained or modified to facilitate the excavation works / superstructure works after the foundation works is completed, would BD consider such partially retained / modified temporary steel platform becomes Case 2 / Case 3 temporary works?</p>	<p>BD advised that in general, a Case 1 temporary steel platform which is retained for subsequent stages of works would be regarded as Case 2 or Case 3 temporary works. If modification to the temporary steel platform was required, the requirements stipulated under paragraphs 4.9, 4.10 and 4.11 of the Code of Practice for Site Supervision 2009 (2024 Edition) for Case 2 and Case 3 temporary works should be followed.</p>
10.	<p><b><u>Supporting Calculations for Standard Details from Other Government Departments</u></b></p> <p>Would BD please advise whether the supporting calculations for the structural details that are extracted from the standard details (e.g. road kerb, u-channel, catchpit / manhole etc.) from other government departments are required in the superstructure / site formation submission.</p>	<p>BD advised that the standard details and drawings from the relevant government departments would be considered on case basis and might request for the supporting structural calculations when necessary.</p>
11.	<p><b><u>Supporting frames for air-conditioning unit under Class II Minor Works</u></b></p> <p>Under the Minor Works Control System, the supporting frames for</p>	<p>BD advised that the recommended design and details for Class II and Class</p>

air-conditioning unit that i) projecting from the external wall  $\leq 600\text{mm}$ ; ii) Design weight capacity  $\leq 150\text{kg}$ ; and iii) distance between frame from roof or ground  $> 3\text{m}$  are classified as minor works item 2.49.

With reference to the recommended design and details for minor works item 2.49 in Appendix VII of Technical Guidelines on Minor Works Control System (2024 Edition) as shown below, it specifies the parent structure of such supporting frames shall be either structural wall / column / beam with minimum thickness of 150mm.

III minor works in the Technical Guidelines on Minor Works Control System (2024 edition) were provided for Prescribed Registered Contractors' (PRC) reference only. The appointed PRC should assess the structural capacity of the supporting member and ensure the proposed works are safe and stable against all conditions.



	<p>Would BD please clarify the necessity to follow such supporting requirement to classify the supporting frames of air-conditioning unit as minor works item 2.49.</p>	
<p><b>AOB Items</b></p>		
<p>12.</p>	<p><b><u>Horizontal Screens/Covered Walkways</u></b> (Item raised by HKIA)</p> <p>In paragraph 20(a) and 20(b) of PNAP APP-42, it states that “<i>horizontal screens/covered walkways are in communal outdoor passageways at ground floors or podium floors; the horizontal screens/covered walkways should be an open-sided structure and connect directly:</i></p> <p><i>(i) the main initial access at the lot boundary to the main entrance of a building; and/or</i> <i>(ii) the main entrances between buildings.”</i></p> <p>We would like to clarify that:</p> <ul style="list-style-type: none"> <li>- whether the horizontal screen / covered walkway <b>open on one side</b> is considered as an open-sided structure.</li> <li>- whether the main entrances between buildings include the <b>entrances to recreational facilities for residential developments and carparking facilities.</b></li> </ul>	<p>BD advised that the horizontal screens/covered walkways to be exempted from GFA and site coverage calculations under paragraph 20 of PNAP APP-42 should be open-sided as far as possible and the design would be considered on case basis.</p> <p>The main entrances between buildings under paragraph 20(b)(ii) of PNAP APP-42 include the entrances to the buildings of recreational facilities and car parks.</p>

<p>13.</p>	<p><b><u>Horizontal Screens/Covered Walkways</u></b> (Item raised by HKIA)</p> <p>In paragraph 20(f) of PNAP APP-42, it states that “<i>the maximum width and height of the horizontal screens/covered walkways should not exceed 3.5m and 4.5m respectively</i>”.</p> <p>We would like to clarify that the width and height mentioned are referring to <b>clear height</b> and <b>clear width</b>.</p> <p>We would also like to ask whether it would be acceptable for a <b>partial relaxation of the clear height to 4.7m</b> in the case that the goods vehicles are required to pass underneath the horizontal screens/covered walkways to the loading and unloading area.</p>	<p>BD advised that the requirements under paragraph 20(f) of PNAP APP-42 referred to the maximum width and height of the horizontal screens/covered walkways, but not the clear width and clear height.</p> <p>The height limit for the portion of horizontal screens/covered walkways across driveway for medium/heavy goods vehicles or container vehicles, which requires 4.7m clear headroom might be considered on case basis.</p>
<p>14.</p>	<p><b><u>Shelters for Outdoor Fixed Seats</u></b> (Item raised by HKIA)</p> <p>In paragraph 24(b) of PNAP APP-42, it states that “<i>the shelters should be an open-sided structure with a width and a height of not more than 3.5m</i>”.</p> <p>We would like to clarify that the width and height mentioned are referring to <b>clear height</b> and <b>clear width</b>.</p>	<p>BD advised that the requirements under paragraph 24(b) of PNAP APP-42 referred to the maximum width and height of the shelters, but not the clear width and clear height.</p>
<p>15.</p>	<p><b><u>Covered Picking Up and Setting Down Area for Passengers</u></b> (Item raised by HKIA)</p>	

	<p>In paragraph 42(b) of PNAP APP-42, it states that “<i>the covered area should be open-sided</i>”.</p> <p>We would like to clarify that a covered area <b>open on one side</b> is considered acceptable.</p>	<p>BD advised that the covered picking up and setting down area for passengers adjoining the communal main entrance of a building to be exempted from GFA and site coverage calculations under paragraph 42 of PNAP APP-42 should be open-sided as far as possible and the design would be considered on case basis.</p>
<p>16.</p>	<p><b><u>Horizontal/Vertical Extension for Accessible Lifts at Existing Buildings</u></b> (Item raised by HKIA)</p> <p>In paragraph 44 of PNAP APP-42, it states that “<i>Horizontal/vertical extension including the associated corridors, lobbies and bridges for additional accessible lifts to enhance communal barrier free access to existing buildings may be exempted from GFA and SC calculations</i>”.</p> <p>Nowadays, many lifting platform products function like a conventional accessible lift, i.e. with normal call buttons and could be used independently by the persons with disability. We would like to ask if the extension with this kind of <b>lifting platforms can also be exempted from GFA and SC calculations.</b></p>	<p>BD advised that the GFA concession was applicable to the horizontal or vertical extension for additional accessible lifts to enhance communal barrier free access to existing buildings, and was not applicable to vertical lifting platforms.</p>
<p>17.</p>	<p><b><u>GFA Concession for Car Parks</u></b> (Item raised by HKIA)</p> <p>In paragraph 18(c) of PNAP APP-2, BD will consider disregarding GFA of aboveground car parks and loading/unloading areas under the BO if such car park structure <b>poses no adverse environmental or visual impact.</b></p>	<p>BD advised that the aboveground car parks that would not pose adverse environmental or visual impact to its surrounding areas might be 100% disregarded from GFA calculation under paragraph 18(c)(ii) of PNAP APP-2. Paragraph 6 of Appendix C to PNAP APP-2 set out that a car</p>

	<p>We would like to ask <b>if the proposed structure is in compliance with the Sustainable Building Design Guidelines (SBDG) under PNAP APP-152, it will be considered as having no adverse environmental or visual impact.</b> If not, please advise the specific requirements for the fulfilment of these criteria.</p>	<p>park in a building development with plot ratio not exceeding 1 and not more than 6 storeys (5 storeys above 1 storey car park) would be regarded as not posing adverse environmental or visual impact to its surrounding areas for the GFA concession. Developments with aboveground car parks simply complying with SBDG would not be considered as posing no adverse environmental or visual impact for the GFA concession.</p>
<p>18.</p>	<p><b><u>Design Wind Loads for Tower Crane</u></b> (Item raised by BD)</p> <p>Following item 14 of ADF 2/2025 held on 9 May 2025 regarding the design wind loads for tower crane and its supporting structures, a subsequent meeting was held with Hong Kong Tower Crane Association (HKTCA) in order to have a better understanding of the tower crane operation in both in-service and out-of-service conditions. As confirmed by the HKTCA, full wind loads would be adopted in the design of tower crane and its supporting structure under out-of-service condition. For in-service condition, HKTCA advised that under the current practice, a management approach based on the actual wind speeds measured on site by an anemometer installed on the cranes would be adopted. Tower crane operation would cease to operate well before the maximum wind speed specified by the tower crane manufacturer is reached (e.g. 14-15m/s of maximum gust wind speed of 20m/s specified by most of the tower crane manufacturers). In light of the above, the effective management approach currently adopted by the industry for tower crane under in-service condition was considered appropriate. However, the foundations and temporary supporting structures including connections</p>	<p>Members noted.</p>

	<p>and anchorages for tower crane should be designed to withstand the maximum in-service and out-of-service loadings.</p>	
19.	<p><b><u>SmartCheck System</u></b> (Item raised by BD)</p> <p>BD advised that the SmartCheck System was developed by the Geotechnical Engineering Office of the Civil Engineering and Development Department to streamline material compliance checking of laboratory test reports in public works projects. BD encouraged practitioners to submit standardised material test reports for compressive strength of concrete cubes, concrete cores and steel reinforcements with encoded digital signature and quick-response (QR) code to enhance the efficiency and data accuracy for compliance check of test results by adopting SmartCheck System.</p>	<p>Members noted and supported.</p>
20.	<p><b><u>2025 Legislative Council General Election</u></b> (Item raised by BD)</p> <p>BD appealed practitioners to participate in the Legislative Council General Election on 7 December 2025.</p>	<p>Members noted and supported.</p>