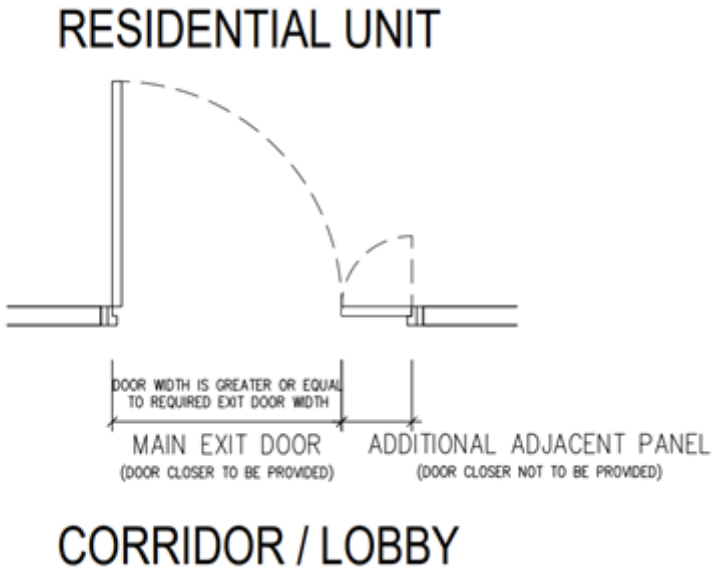
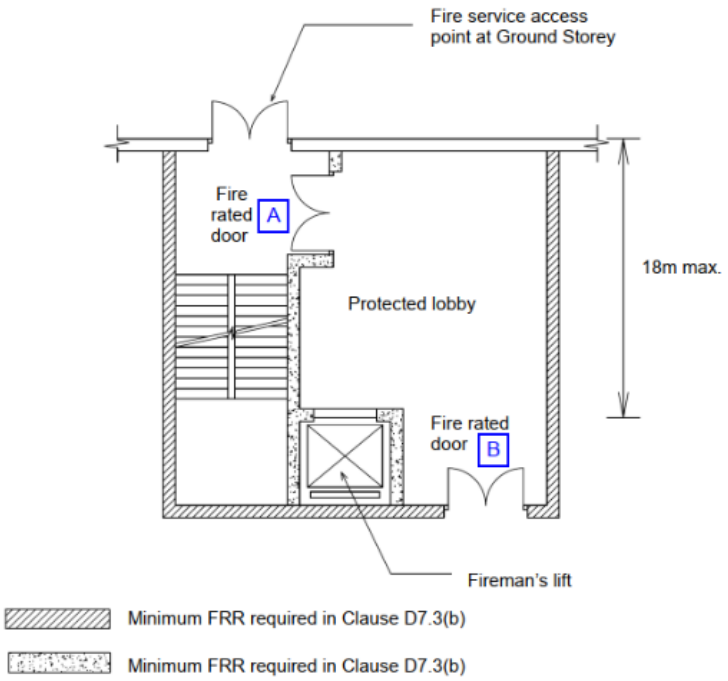
Summary of Items Discussed in APSEC Discussion Forum (ADF) 1/2025 on 14 February 2025

	Items proposed by Convenors for Discussion	Summary of Discussion and BD's Response
	Items raised by HKIA	
1.	**<u>Door Closer for Door Panel adjacent to the Required Exit Door for Residential Unit</u>** It is very often that, beside the required exit door, an **"additional adjacent door panel"** usually of a smaller size is provided at the main exit door leading from a residential unit to a common corridor on a residential floor. The purpose for such **"additional adjacent door panel"** is not for fulfilling the required exit door width but for convenience like the moving of furniture in or out of the concerned residential unit. Provided that the required exit door is already fulfilling the exit door width requirements and that **"additional adjacent door panel"** is normally at a locked position and of the same fire-rating and construction as the required door exit door, it is our understanding that a door closer will **NOT** be required for said **"additional adjacent door panel".** Would BD please advise if our understanding is correct or not?	BD advised that according to item 15 of ADF 3/2015 on 29 May 2015, double-leaf door at residential flat with the smaller leaf less 600 mm wide was acceptable as long as it would not be subject to daily use but only be opened in rare occasions such as the moving of large furniture. By the same token, BD considered the non-provision of door closer at the "additional adjacent door panel" required under Clause C16.1 of the Code of Practice for Fire Safety in Buildings 2011 (2024 Edition) (FS Code) acceptable, provided that such door panel was provided with the requisite fire resistance rating (FRR), less than 600 mm wide, normally maintained at a locked position, not contributing to minimum width of exit and not serving as an exit door.

		
2.	**<u>Diagram D4 of the FS Code – Access to a Fireman's Lift at Ground Storey</u>** Diagram D4 of the FS Code extracted below illustrates the access to a fireman's lift at ground storey, with fire rated doors between the protected lobby and an required staircase discharging to the fire service access point (FSAP) (Door "A"); and between the such protected lobby and the reminder of the ground storey (Door "B").	BD advised that according to item 20 of ADF 3/2024 on 9 August 2024, BD would favourably consider Scenario 1 and 2 in which a required staircase opened off the passage from the FSAP to the fireman's lift required under Clause D7.3(b) of the FS Code, subject to the compliance with requirements under Clause B9.1 of the FS Code and no objection from the Fire Services Department (FSD).

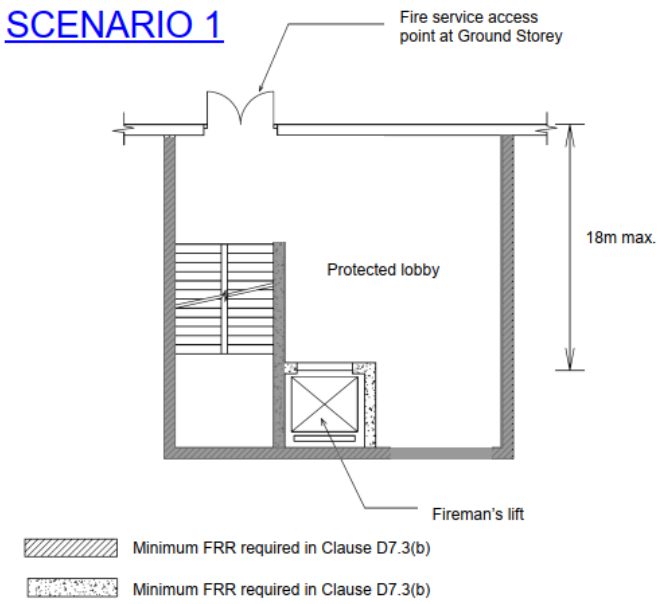


Will BD favourably consider the following scenarios illustrated in the below diagrams:

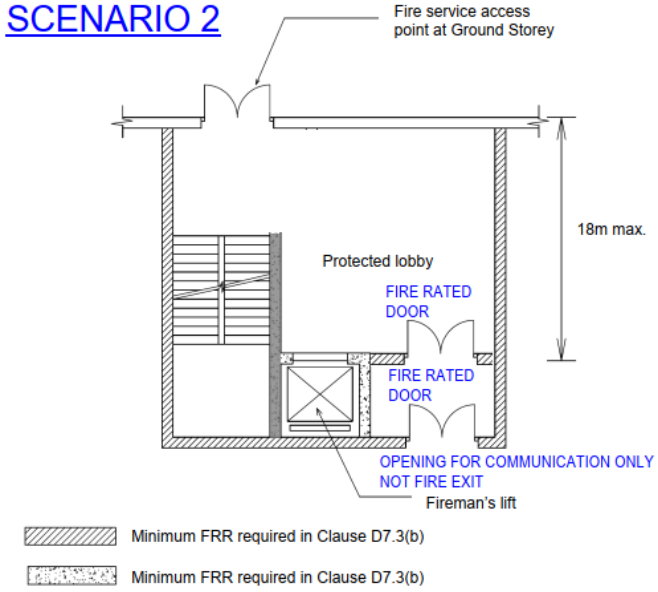
Scenario 1: If the lobby is completely separated from the reminder of the ground storey, can Door "A" be omitted?

Scenario 2: If Scenario 1 is considered acceptable, can Door "A" be omitted if Door "B" is replaced by a protected lobby?

SCENARIO 1



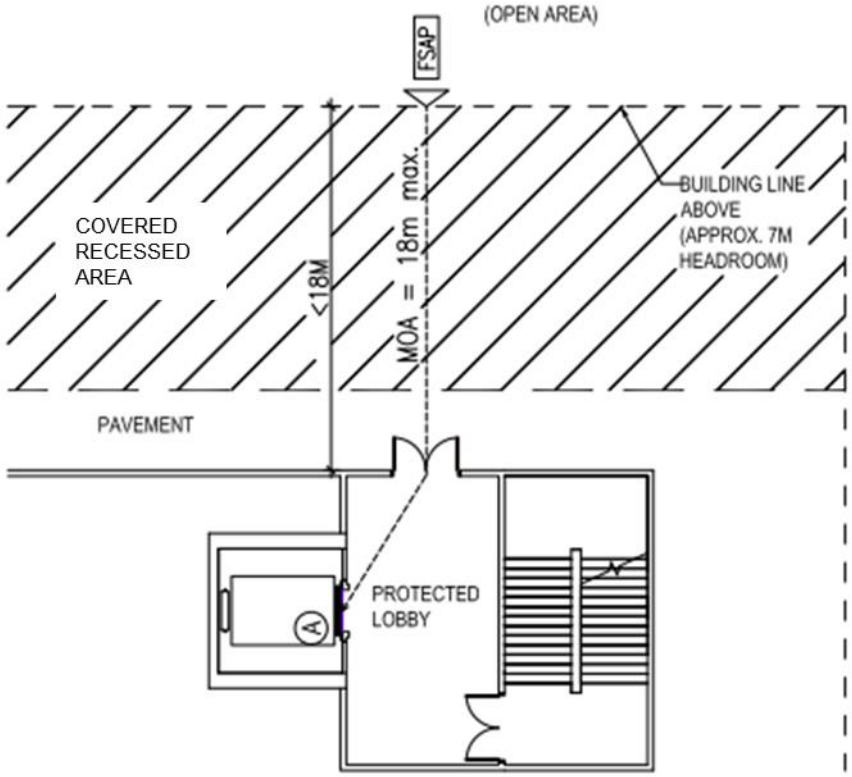
SCENARIO 2



3.	**Site Measurement Tools** In some new development projects, BD officers accepted the use of laser meter for inspections prior or upon the application for occupation permit (OP), in lieu of traditional measuring tape. However, in some cases, BD officers did not accept the use of laser meter. Could BD advise if laser meter is acceptable or not as a measurement tool for such inspections?	BD advised that the use of a laser meter for site measurement was generally acceptable.
4.	**Distance from Fireman's Lift with FSAP on the same storey aboveground** Clause D8.4 of the FS Code requires "*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*." In some projects, the fire service access point (FSAP) is located at a storey above ground floor, e.g. 3/F on the podium level. It is our understanding that this floor is NOT served by those fireman's lifts and Clause D8.4 is not applicable. Would BD please advise if our understanding is correct or not?	BD advised that according to Clause D7.1 of the FS Code, FSAP should be provided at a ground storey. Any application for deviation of relevant requirements would be considered on case basis and subject to the comments from FSD. BD also advised that according to Clause D8.4 of the FS Code, the requirement of 60 m was generally not applicable to floors not served by a fireman's lift.
5.	**Opening for Drains on Structural Walls** 300 mm x 300 mm openings, based on typical construction details, were reserved on structural walls for penetration of surface channel(s) in a semi-open space. When the said drainage arrangement was incorporated onto amendment plans for drainage works, BD requested to have the plans and details of such structural openings indicated on the superstructure plans for approval prior to the approval of the drainage (amendment) plans.	BD advised that approval of separate structural submission with the details of the said structural openings was not a prerequisite for approval of a drainage proposal. BD officers would be reminded of such practice. Nevertheless, AP/RSE should coordinate the submissions and ensure that the drainage and corresponding structural proposals had been approved before applying consent for commencement of the relevant building

	Could BD please clarify if the approval of such openings on superstructure plans is a prerequisite for approval of drainage plans?	works. Paragraph 2 of PNAP ADM-19 was relevant.
6.	**<u>Access to Inaccessible Roof</u>** Paragraph 4.2.3 of the Code of Practice on Access for External Maintenance 2021 (2024 Edition) (AfEM Code) M&R Code states that "*where it is impracticable to install permanent guard-rails around the whole perimeter of an inaccessible roof due to site constraints and/or other design considerations, subject to the conditions mentioned in paragraph 4.2.4, the following alternative shall be provided: (i) proprietary collapsible guard-rail system designed to resist the imposed loads and wind loads not inferior to the requirements as stipulated in B(C)R, Code of Practice for Dead and Imposed Loads (Loading Code) and Code of Practice on Wind Effects in Hong Kong; and/or (ii) …*" Would BD advise whether the reduction of building bulk or design coherence would be acceptable design considerations, given that the proprietary collapsible guard-rail system has been designed to resist imposed and wind loads that meet the requirements stipulated in the Building (Construction) Regulation (B(C)R), the Loading Code, and the Code of Practice on Wind Effects in Hong Kong?	BD advised that paragraph 4.2.3 of the AfEM Code aimed to allow flexibility in building design, and the design considerations mentioned in the said paragraph should be considered on case basis. The erection of proprietary collapsible guard-rail system with provisions stated under paragraph 4.2.4 of the AfEM Code as an alternative might be acceptable when, for example, the erection of permanent guard-rails had adverse impact to the building elevation; the erection of permanent guard-rails contravened the preservation requirements for heritage buildings; and/or the roof area was too large to install permanent guard-rails around the whole perimeter of the roof.
7.	**<u>Prescribed Window facing Street with Overhanging Building Structure above</u>** Regulation 31(1) of the Building (Planning) Regulations (B(P)R) specifies	BD advised that according to regulation 30(2)(b) of the B(P)R,

	that a prescribed window must face a street that is not less than 4.5 m wide or a space that is uncovered and unobstructed above the area delineated by a rectangular horizontal plane. Would BD accept a prescribed window that faces a street meeting the 4.5 m width requirement, if there is an overhanging building structure above the space to which such window faces immediately into?	prescribed windows were required to face directly into external air. In this regard, BD would consider the scenario put forward by HKIA on case basis, in particular the depth of the overhanging structure and its obstruction to the provision of natural lighting and ventilation.
8.	**<u>Covered FSAP</u>** Regarding Clause B9.1 of the FS Code, BD responded in item 9 of ADF 2/2012 held on 16 March 2012 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."* We would like to seek BD's advice on whether this interpretation is still acceptable. If the above interpretation is still acceptable, could BD please advise if the FSAP could adopt the similar principle and be recessed from the building edge.	Regarding Clause B9.1 of the FS Code, BD confirmed that item 9 of ADF 2/2012 held on 16 March 2012 was still pertinent. However, the design of the FSAP should comply with the requirements under subsection D7 of the FS Code. Any application for deviation of relevant requirements would be considered on case basis and subject to the comments from FSD.

		
9.	**<u>Required Staircase and/or Firefighting and Rescue Stairway (FRS) for Basement</u>** Further to, items 7 and 8 of ADF 2/2023 held on 5 May 2023 concerning Clause B9.2 and Clause D7.3 of the FS Code, we would like to seek BD's advice on whether the required staircases and/or the FRS serving the basement can utilize the FSAP on the ground floor as a discharge point to the	With reference to item 2 above, BD would favourably consider to accept a required staircase opening off the passage from the fire service access point (FSAP) to the fireman's lift required under Clause D7.3(b) of the FS Code, provided that the requirements under Clause B9.1 were

	street.	complied with and there was no objection from FSD. If such required staircase opened off a FRS, Subsection D17 of the FS Code should also be complied with.
10.	**Clause D7.3(b) of FS Code – FSAP** According to Clause D7.3(b) of the FS Code, the passage from the FSAP to the fireman's lift shall be separated from the remainder of the ground storey by fire rated walls. It is our understanding that if a portion of such passage is within a covered and open-sided hard/soft landscape area, fire rated walls to separate such passage from the landscape area is not required due to low fire risk. Would BD please confirm whether our understanding is correct?	Similar to item 8 above, BD advised that the design of the FSAP should comply with the requirements under subsection D7 of the FS Code. Any application for deviation of relevant requirements would be considered on case basis and subject to the comments from FSD.
11.	**Covered Vertical Greening** Paragraph 1 of Appendix D to PNAP APP-152 revised in September 2023 stipulates that all greenery areas which are measured horizontally based on the soil areas are to be uncovered. It does not explicitly mention whether the requirement applies to vertical greenery or not. The table in paragraph 3 of the said PNAP also mentions that there is "no restriction" on the location of the vertical greening to be proposed. Would BD please clarify whether vertical greenery can be covered or not?	BD advised that the provision of greenery aimed to improve the environmental quality of the urban space, particularly at the pedestrian level, and to mitigate the heat island effect. Vertical greening that grew on a vertical surface should meet the same objectives. In general, greenery areas were uncovered in accordance with paragraph 1(i) of Appendix D to PNAP APP-152.

		Regarding the design requirements for vertical greening being shadowed vertically, the requirements in paragraphs 1(ii) to (iv) and Figure D1 of Appendix D to PNAP APP-152 were relevant. Any deviation from the above would be considered on case merits.
12.	**<u>Internal Lining for Smoke Outlets</u>** Clause C14.2 of the FS Code stipulates that *"every basement that is enclosed on four sides should be provided with smoke outlets"*. Clause C14.4 states that the smoke outlet shaft should *"be provided with an FRR enclosure having an FRR not less than that required for the element of construction of the storey served or through which it passes, whichever is the higher."* In some of the premises with high acoustic requirement, internal lining would need to be provided inside the smoke outlets. As there is no requirement on fire performance of the lining material, would BD accept the use of such internal lining material if it complies with the requirements imposed by FSD on the lining material for ductwork of dynamic smoke extraction system, and achieves an index of overall performance (fire propagation index) not exceeding 12 and the sub-index i_1 not exceeding 6 when tested against BS 476 Part 6?	BD advised that where a smoke outlet serving a basement extended into or through another storey, it should be fire rated or be protected with a fire rated enclosure according to Clause C14.4 of the FS Code. Such material should be tested in accordance Part E of the FS Code including Clause E6.1. In addition, the FRR criteria in item 10 of Table C2 of the FS Code should be satisfied.
13.	**<u>Identification Information of AP/RSE/RGE required on Form BA5 for Amendment Plan Submissions</u>** As discussed in item 19 of ADF 3/2016 held on 27 May 2016 and item 22 of ADF 4/2022 held on 12 August 2022, the AP/RSE/RGE can complete and sign	BD advised that either Business Registration number or HKID number of the applicant would be required in the submission of Form BA5 via ESH.

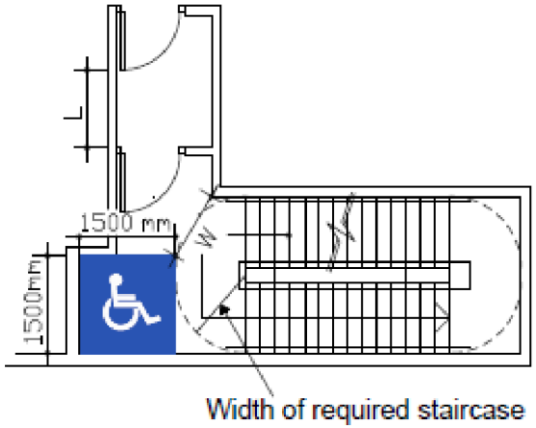
	Part A and Part B of Form BA5 for the amendment plan submissions, rather than requiring the owner to sign as the applicant on such Form. Regarding the details of applicant required to be filled in in Section 2 of Part A of the Form, a Business Registration number is typically required for the owner in the first submission of plans. However, if the AP/RSE/RGE is signing on behalf of the owner upon amendment plan submission, they must provide their HKID numbers. In light of privacy concerns, would BD accept that the AP/RSE/RGE fill in the registration number instead of their HKID number, considering that this arrangement is permitted in Electronic Submission Hub (ESH)?	ESH has undergone the government's privacy impact assessment before its launch to minimise the risk of privacy leakage. BD would consider whether an option could be provided for the paper submissions of Form BA5. Meanwhile, AP/RSE/RGE were encouraged to submit Form BA5 via ESH.
	Items raised by HKIE	
14.	**<u>Consent for Superstructure Works pending the Approval of Maintenance and Repair (M&R) Access Plans</u>** It is stated in paragraph 2 of Appendix F to the AfEM Code that M&R access plans have to be submitted and approved before consent for the commencement of superstructure works can be applied for. As the M&R plans includes M&R access details that are considered minor in nature and would generally likely be approved, would BD consider that consent for superstructure works can be granted once the M&R access plans are submitted?	BD advised that the requirement for M&R access plans to be approved before applying consent for the commencement of superstructure works was to ensure that the B(C)R would be complied with and the M&R provisions would be compatible with the superstructure.

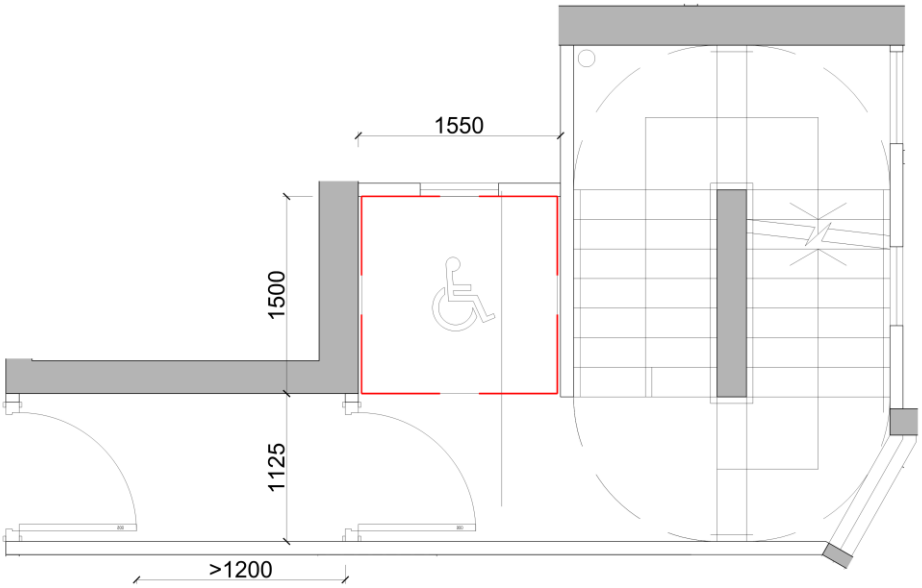
15.	**Submission of Supervision Plan (SP) for Excavation Deeper than 2.5 m and greater than 5 m in length** Paragraph 3(a) of PNAP APP-57 states that approval of excavation and lateral support (ELS) plans is required for excavation deeper than 2.5 m and greater than 5 m in length. Thus ELS details for minor structures like manholes with excavation depth over 2.5 m but with length less than 5 m are usually shown in the drainage (structural) plans of the manholes for information. In paragraph 2 of the common conditions and requirements imposed in approval letter for Manhole/Petrol Interceptor/Grease Trap/Septic Tank/Cesspool Works (SE-SA11B (09/2020)), site supervision shall be provided to the ELS works of these "deeper manholes". Would BD please confirm if the submission of a separate SP is required for the ELS works of these manholes, or the site supervision provided for such ELS works can be included in the SP for the superstructure works?	BD advised that for ELS works and superstructure works to be carried out concurrently on site, submission of one supervision plan appended with the Form C for combined supervision resources would suffice. Section 11 of the Technical Memorandum for Site Supervision 2009 (TM) and paragraphs 8.13 to 8.15 of the Code of Practice for Site Supervision 2009 (2024 Edition) (Supervision Code) were relevant. BD would consider reviewing the site supervision requirement for ELS works for excavation deeper than 2.5 m but less than 5 m in length. [**Post meeting note**: The site supervision requirement should follow the TM and the Supervision Code. In accordance with section 11 of the TM, a supervision plan would be required for excavation deeper than 2.5 m. Therefore, this requirement could not be relaxed.]
16.	**Streamlining the Application for Modification of Section 31(1)(a) of the B(C)R** Regarding item 15 of ADF 3/2024 held on 9 August 2024, the suggested arrangement on the use of drilled-in anchors as remedial fixing for the curtain wall for reducing the number of modifications of section 31(1)(a) of the B(C)R was found unacceptable to BD. BD would study the feasibility of administrative streamlining to minimise the number of applications for such modification. Would BD please provide an update on the study?	BD advised that PNAP APP-37 and APP-169 would be revised to allow blanket application for modification of/exemption from section 31(1)(a) of the 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. The application would be considered on case basis

		and additional conditions, such as increased sampling rate for the strength test of drilled-in anchors and addition of acceptance criterion on recovery of deformation after removal of all test loads, might be imposed.
17.	**5A Monitoring System – PNAP APP-137** Appendix A to PNAP APP-137 stipulates a 5A system for monitoring, which limits the ground settlement to 25 mm at Action Level 3. In paragraph 15 of the said PNAP, it states that if the empirical limits in Appendix A are not adopted, RSE/RGE may adopt an engineering approach to establish site-specific limits for monitoring by referring to Appendix C to PNAP APP-24. Would BD please advise on the following: 1. Is a 3A system still acceptable by BD? 2. Are the empirical limits in paragraph 3 of Appendix A to PNAP APP-137 specifically for monitoring pile installation works? 3. Can the approaches/limits set out in GEO Technical Guidance Note No. 54 be adopted if an engineering approach is taken?	BD advised that revised PNAP APP-137 aimed to encourage registered building professionals to enhance monitoring control of pile foundation and ELS works by adopting a five-tier triggering system (i.e. Alert, Alarm, Action Levels 1, 2 and 3); and to allow engineering approach for assessment of the effects of such works on adjacent buildings/structures/land/services by referring to Appendix C to PNAP APP-24. 1. While the five-tier triggering system enabled the registered building professionals and registered contractors to take proactive measures and to step-up actions earlier corresponding to the respective trigger values of the Action Levels reached, the adoption of three-tier triggering system (i.e. Alert, Alarm, Action Levels) would also be acceptable by BD. 2. The empirical limits in Appendix A to PNAP APP-137 were not only applicable to the monitoring pile installation works, but also other related activities in excavation and lateral support works that might have adverse effects on adjacent buildings/structures/land/services (sensitive receivers), such as dewatering, preloading of struts and bulk excavation works, etc.

		3. When adopting engineering approach for assessment of the effects of the proposed works on the adjacent sensitive receivers and establishing the site-specific limits for monitoring the works, the acceptance of the assessment and analysis by the relevant government authorities and/or permission of using the site-specific limits from the stakeholders of the adjacent sensitive receivers to be affected by the works would be required. The registered building professionals could make reference to the limits in GEO TGN No. 54 for conducting the engineering assessment and analysis, subject to BA's approval on case basis.
18.	**<u>Alternative Arrangement for Witnessing Foundation Proof Load Test</u>** Circular Letter on Alternative Arrangement for Witnessing Foundation Proof Load Test issued by BD on 2 June 2023 accepts the alternative arrangement that AP/RSE/RSC may employ videotelephony to let BD officers witness not more than 50% of the foundation proof load tests in office without visiting the site in person. This practice is well received by the industry as it provides better flexibility for both the practitioners and the government in resources management. For medium and large size development where the total number of driven piles and/or socketed H-piles is greater 1,000, the total number of proof load tests shall be greater than 10. With normally 3 number of proof tests be arranged concurrently on the same day, the BD colleagues need to witness the tests on site for at least 2 times.	As BD played an important role to exercise its responsibilities with independence and impartiality in witnessing the site tests, BD advised that the concerned requirement would not be further relaxed at this stage. To facilitate practitioners' planning of site activities, BD officers would carry out site inspections for witnessing the foundation proof load test within 5 working days upon received the request by RSE or his/her representative.

	As the above alternative arrangement has been operated smoothly for more than 1 year, would BD consider relaxing the 50% on-site witness requirement to facilitate the development progress?	
	Items raised by AAP	
19.	**<u>Adequate Fall on Car Park Floors – PNAP APP-105</u>** Paragraph 30(d) in Appendix B to PNAP APP-105 on Water Seepage states that *"Car park floors should allow adequate fall and avoid ponding."* For indoor car park where car washing / cleaning facilities are provided in accordance with paragraph 30(c) of Appendix B to the said PNAP, surface water is not anticipated on the car park floor as car washing by simply pouring water over the car is often prohibited by the property management and an area designated for car washing with proper drainage facilities will be provided. Under such circumstances, will BD accept such car park floor be designed without gradient fall?	BD advised that Appendix B to PNAP APP-105 provide guidelines for proper design and quality construction for prevention of water seepage in new buildings. AP was also reminded on paragraph 30(e) of the said Appendix that car park floor slabs should be designed to fall away from the ramps to prevent surface water from flowing into the car park along the vehicular ramps. Particular attention was also drawn to the upward trend of climate change and the developments at areas of costal hazards. AP/RSE should adopt proper design and construction to avoid ponding/flooding at car park floors. In this regard, the proposed property management measures might not serve the purpose.
20.	**<u>Minor Works - Partition Walls inside Flats</u>** According to the requirements under the Minor Works Control System for minor works items 1.41, 1.43, 3.39 and 3.40, erection of non-load bearing block wall in a flat is allowed. Would BD please advise if the erection of non-load bearing wall of other construction, e.g. dry wall partition, is also	BD advised that the erection of dry wall partition of relatively low density in a flat did not fall into any minor works items. Provided that the works were not carried out in contravention of any regulations related to the standards of fire safety, structural safety, drainage works, etc., the works

	acceptable subject to the compliance of other requirements stated in the above minor works items.	should be considered as exempted works under section 41(3) of the Buildings Ordinance (BO).
21.	**<u>Temporary Refuge Space (TRS) in Landing of Required Staircase</u>** According to Clause B30.1 of the FS Code, the temporary refuge space can be located in the landing of a required staircase (i.e. within the protected exit, Diagram B6 Example (d) of the FS Code refers):  To our understanding, the user of the TRS (i.e. persons with a disability) should stay safe in the TRS, waiting for assistance and is not expected to return to the common corridor which is an unprotected area. Therefore, the minimum 330 mm wide unobstructed area adjacent to the door handle on the leading face of the fire-rated door required under paragraph 39(1) of the Design Manual: Barrier Free Access 2008 (2024 Edition) (DMBFA) is not applicable and the following layout is acceptable:	BD advised that according to paragraph 37 of the DMBFA, doors should be designed to enable all people especially wheelchair user to enter and leave any room unaided or without undue difficulties. In the regard, BD advised that both doors of the protected lobby doors should comply with the requirements under paragraph 39(1) of the DMBFA to enable the wheelchair users returning from the TRS to the common corridor, and the length of the protected lobby should be not less than 1200 mm, excluding space for door swings, to allow space for manoeuvring wheelchairs according to paragraph 31(c) of the DMBFA.

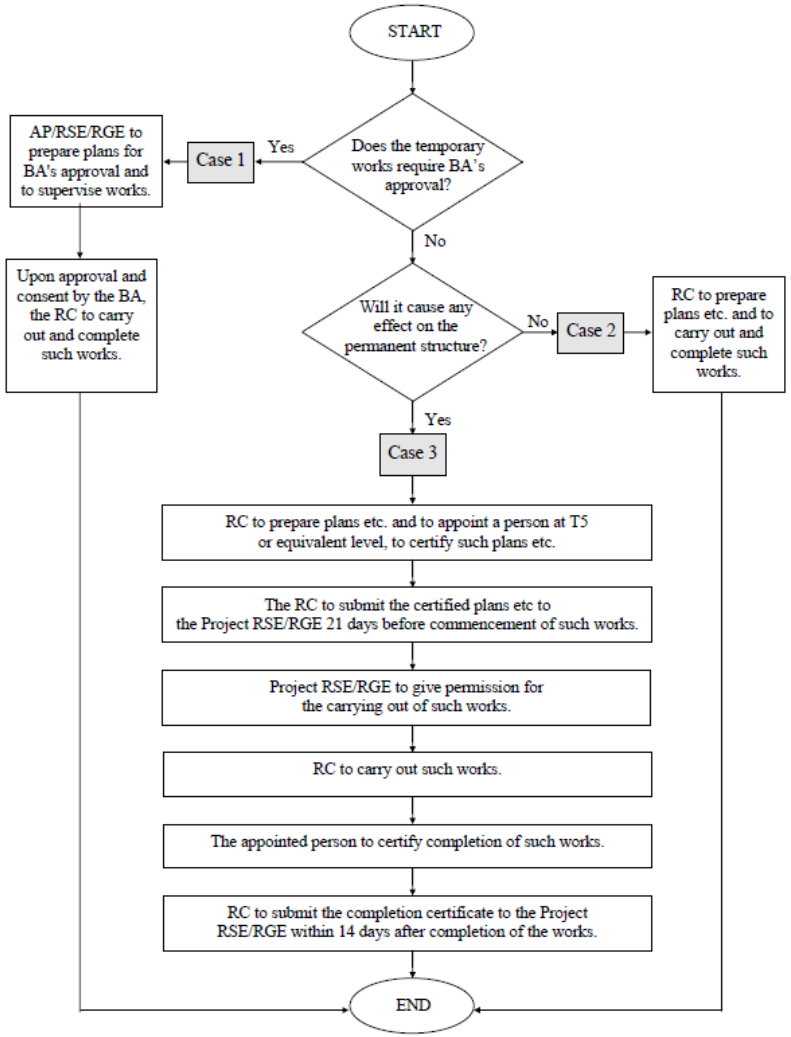
	 DIAGRAM - TRS LOCATION	
	Items raised by ACEHK	
22.	**<u>Temporary Works involving Kingposts in Deep Basement Excavation</u>** For developments with deep basement excavation, in many occasions temporary kingposts are required to support temporary working platform or and/or tower crane to facilitate excavation works and the associated lifting activities. These kingposts are normally independent from the ELS works approved under separate ELS submission and in some cases the installation of these kingposts may be entrusted to the foundation contractor. Our understanding is that the installation of these temporary kingposts falls	BD advised that the installation of temporary kingposts which provided supports to the temporary working platforms and/or tower cranes, did not form part of the ELS works shown on the approved plans) and had no effect on the permanent structures, the adjoining buildings and lands by way of overstressing or overloading, was regarded as Case 2 temporary works. The Registered Contractor should follow the working procedures of Case 2 as stipulated under paragraphs 4.9(b) and 4.12 (as appropriate) of the Supervision Code. RSE might include such

	into Case 2 according to paragraph 4.7 of the Supervision Code extracted below, since the works do not cause any effect on the permanent structure. It is thus the Registered Contractor (RC)'s sole responsibility to prepare the prescribed plans, carry out and complete the works with proper site supervision.	temporary kingposts in the ELS and/or foundation plans for information.

	4.7 The division of responsibility between AP/RSE/RGE and RC for temporary works and working procedures is detailed below: Case 1 When the prescribed plans stipulate the temporary works, and the sequence of construction or method statements are also shown on prescribed plans, both the AP/RSE/RGE and the RC have their own responsibilities to supervise the carrying out of the works in accordance with the approved/prescribed plans and the Buildings Ordinance and Regulations. Case 2 When the temporary works, the sequence of construction or method statements are not required to be shown on prescribed plans and have no effect on the permanent structure by way of overstressing or overloading, the RC has the sole responsibility of ensuring the integrity of temporary works and that the carrying out of temporary works should be safe and should not endanger the workers on site, the public and adjoining buildings. Case 3 When the temporary works, the sequence of construction or method statements are not required to be shown on the prescribed plans but may have effect on the permanent structure by way of overstressing or overloading, the RC shall appoint a person whose qualification and experience are not inferior to a TCP of grade T5 to certify the plans, design information and/or method statement of the temporary works which are to be submitted to the Project RSE/RGE. The person so appointed should also certify the completion of such works. The RSE/RGE may require the RC to submit further calculations to substantiate his design of the temporary works as necessary.	

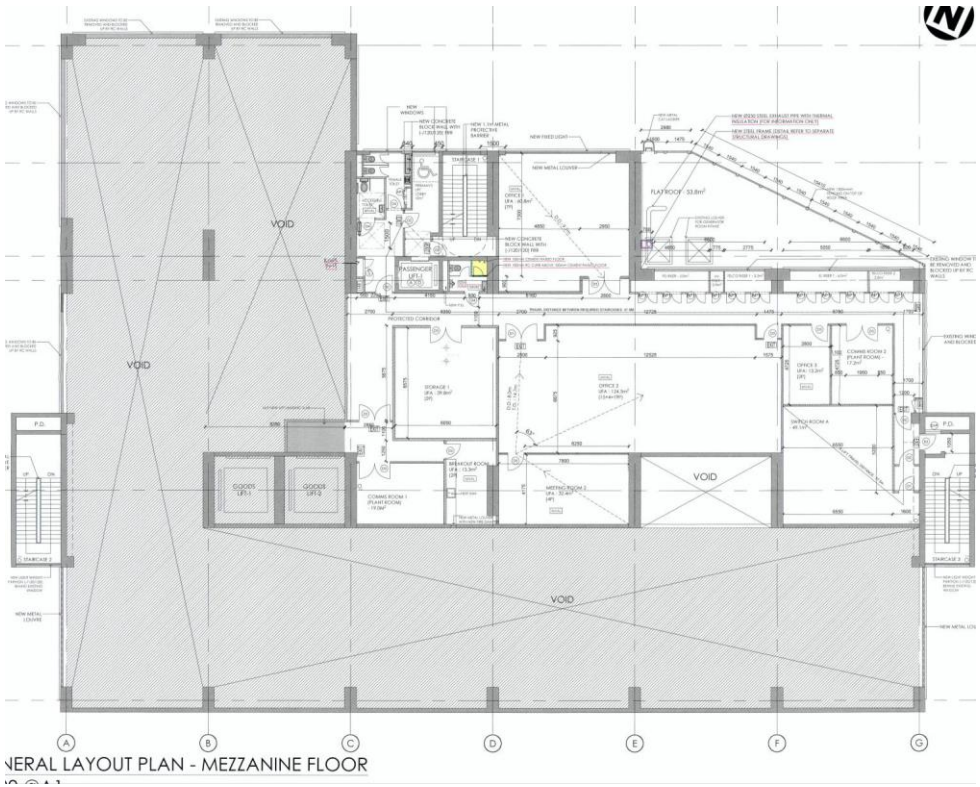
	Since the installation of such kingposts falls into Case 2, the procedures related to Case 3 requiring RC to submit the certified plans to the Project RSE/RGE 21 days before commencement of works and to submit the completion certificate within 14 days after completion of the works as stipulated in Figure 4.2 of the Supervision Code extracted below do not apply.	

Figure 4.2 Flow Chart Showing Procedures for Dealing with Temporary Works

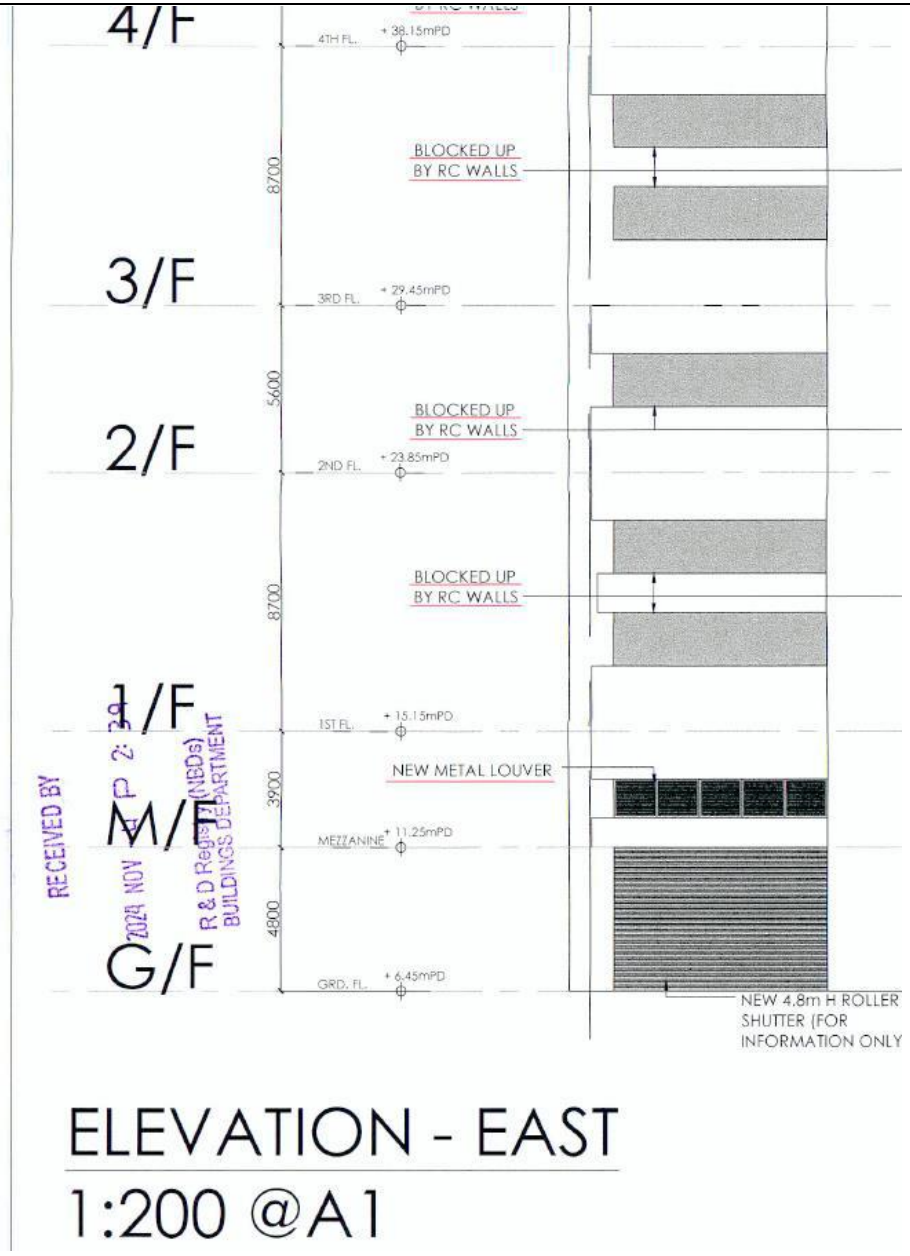


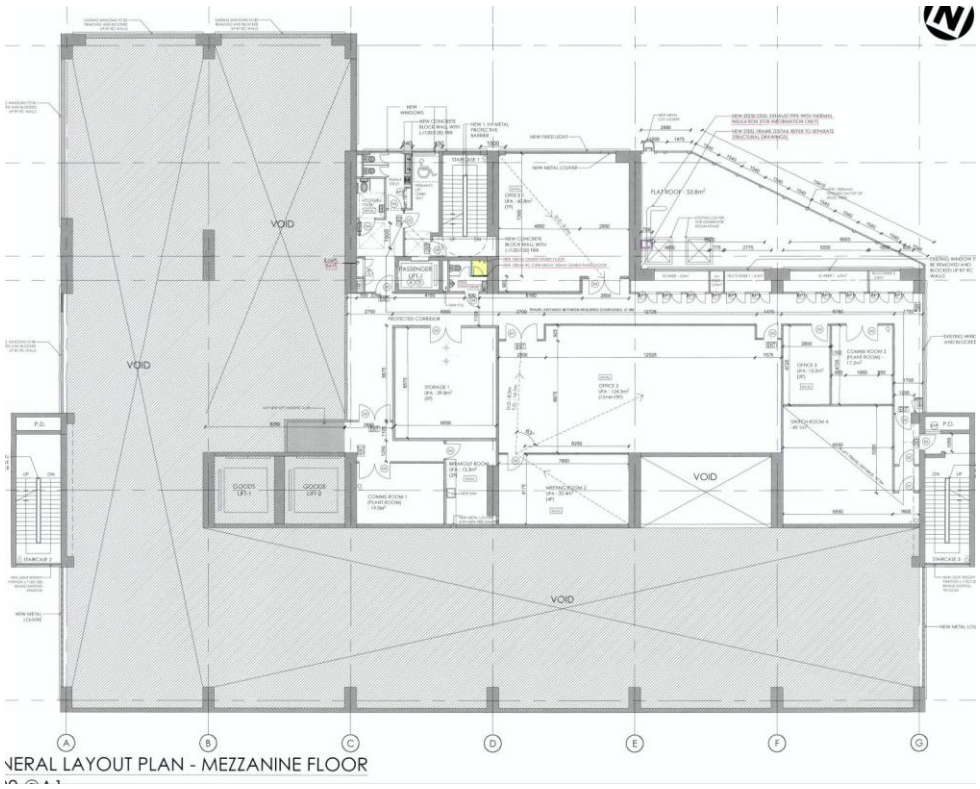
Please confirm if our understanding is correct.

	Items raised by PBSCA	
23.	**<u>Revitalisation of Existing Industrial Buildings – GFA Calculation of Void</u>** The Government has implemented a package of measures to encourage the revitalisation of existing industrial buildings through wholesale conversion of vacant or under-utilised industrial buildings as per PNAP APP-150. In an existing industrial building, the headroom of the major portion of the car park on G/F is 8.7 m. The remaining portion of G/F has a mezzanine floor in it. The headroom of the mezzanine floor is 3.9 m, while the headroom of the ground floor underneath is 4.8 m. As shown in the below diagrams, if the existing mezzanine floor is removed, the headroom of such remaining portion of G/F will be increased to 8.7 m (= 4.8m + 3.9m), which is the same as the existing headroom of 1/F, 3/F and the major portion of G/F. We understand that in the proposed revitalisation project, the area of the void above such remaining portion of G/F as a result of the removal of the existing mezzanine floor can be exempted from GFA calculations. Is PBSCA's understanding correct?	BD advised that comments could only be provided based on the special circumstances of individual cases. Guidelines set out in PNAP APP-150 and items 21 and 22 of ADF 3/2022 held on 13 May 2022 were relevant.

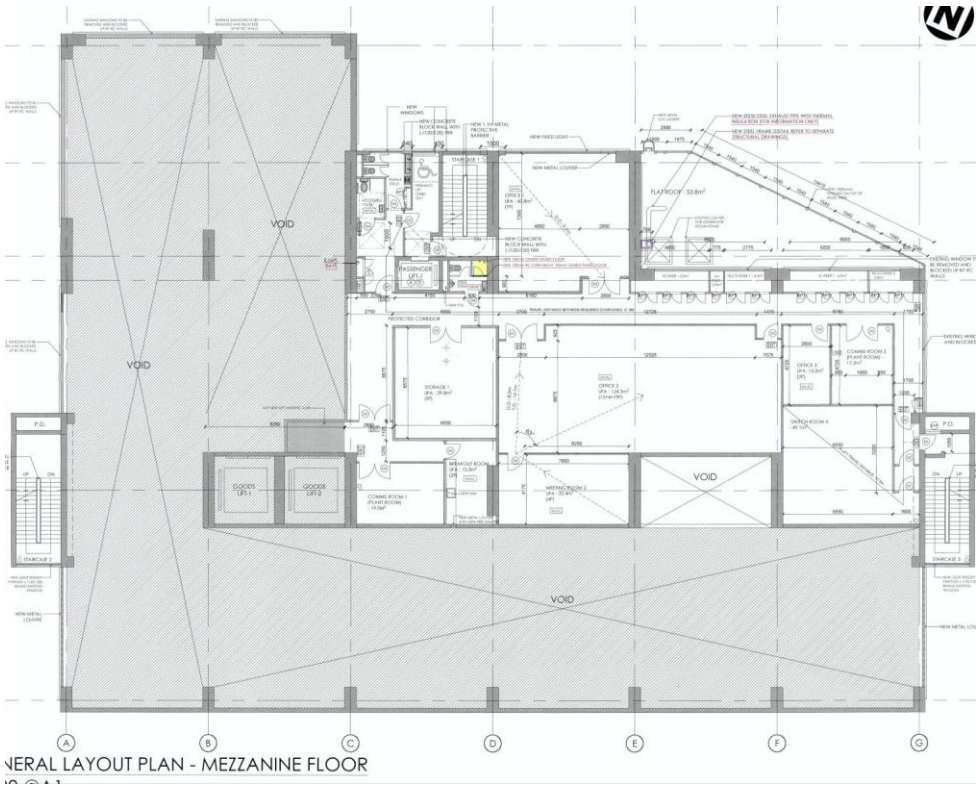


NERAL LAYOUT PLAN - MEZZANINE FLOOR

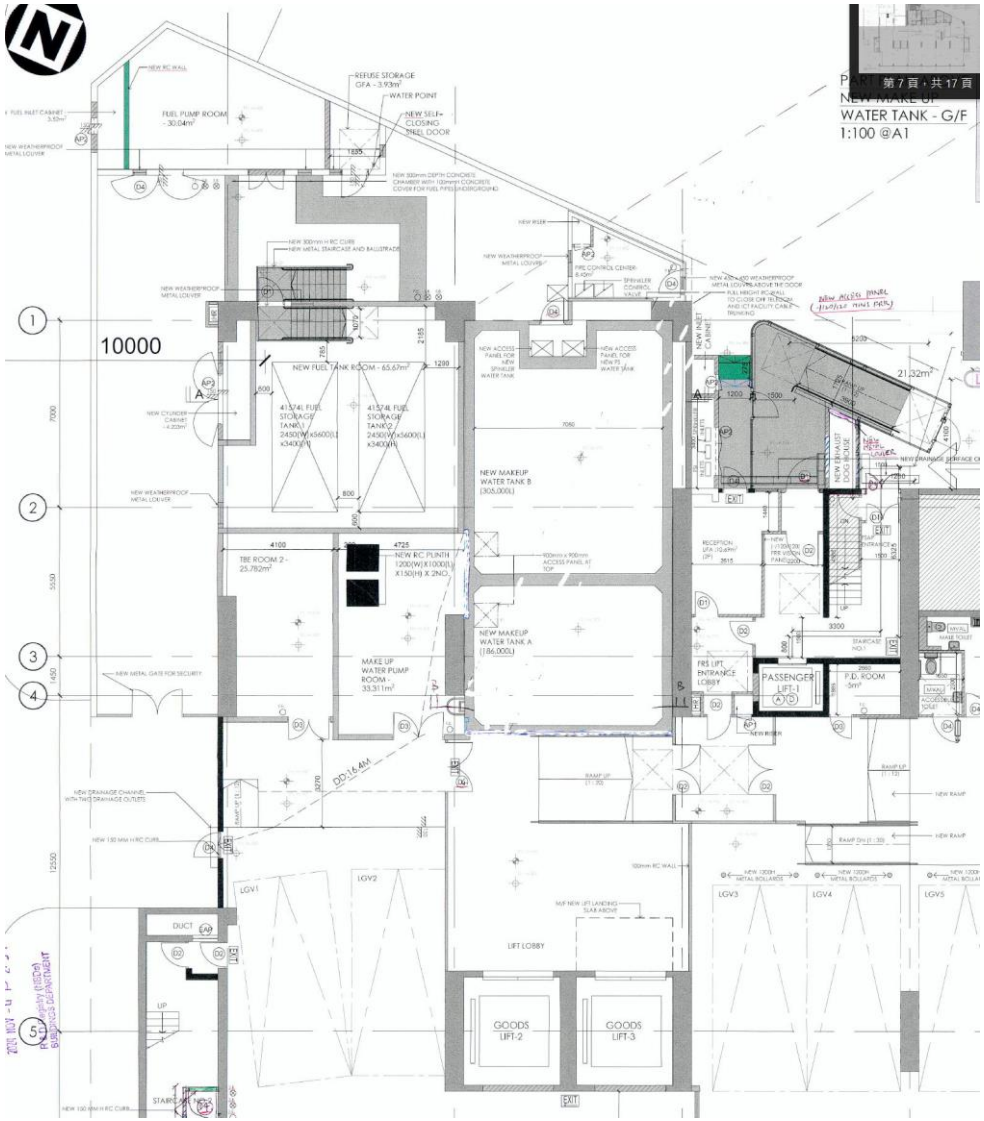

4/F
4TH FL. + 38.15mPD
BLOCKED UP BY RC WALLS
8700
3/F
3RD FL. + 29.45mPD
5600
BLOCKED UP BY RC WALLS
2/F
2ND FL. + 23.85mPD
BLOCKED UP BY RC WALLS
8700
1/F
1ST FL. + 15.15mPD
NEW METAL LOUVER
3900
M/F
MEZZANINE + 11.25mPD
4800
G/F
GRD. FL. + 6.45mPD
NEW 4.8m H ROLLER SHUTTER (FOR INFORMATION ONLY
RECEIVED BY
2024 NOV
R & D Registered (NBDs)
BUILDINGS DEPARTMENT
ELEVATION - EAST
1:200 @A1

24.	**<u>Revitalisation of Existing Industrial Buildings – GFA Calculation of Staircase and Lift without Access to Mezzanine Floor</u>** Continuing from the above item, , the existing Staircase No. 2 and Goods Lift No. 1 (circled in blue in the below diagram) do NOT provide access to the mezzanine floor. Can their areas be excluded from the GFA calculation of the mezzanine floor?  	BD advised that comments could only be provided based on the special circumstances of individual cases. Guidelines set out in PNAP APP-150 and items 21 and 22 of ADF 3/2022 held on 13 May 2022 were relevant.

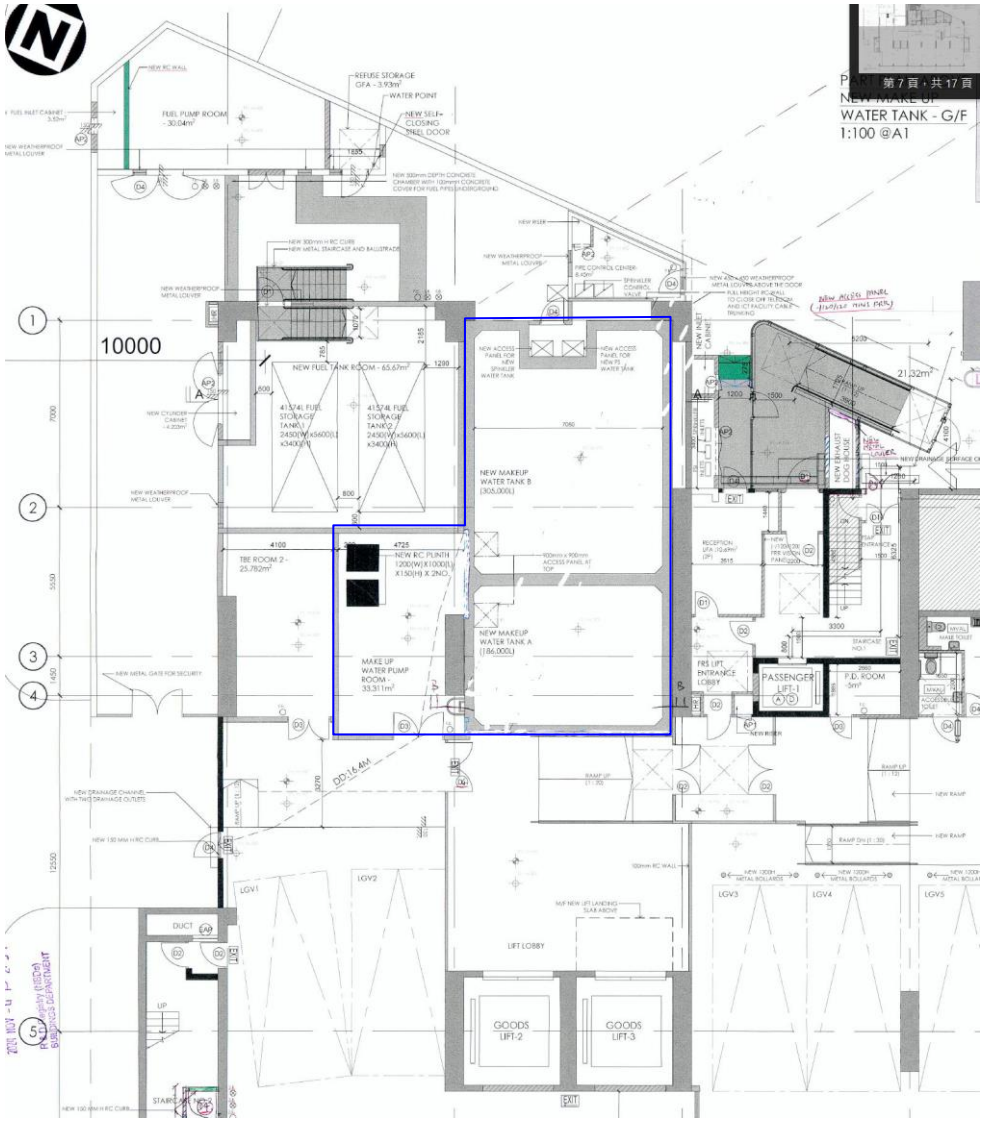
25.	**<u>Revitalisation of Existing Industrial Buildings – GFA Calculation of Mezzanine Floor Solely Used for Additional Transformer Room and Switch Room</u>** Paragraph 5 of PNAP APP-150 states that: *"If the proposed conversion would result in certain covered carparking spaces shown on the approved building plans of the original industrial building becoming redundant and such carparking spaces had previously been disregarded from the gross floor area (GFA) calculation under Regulation 23(3)(b) of the B(P)R, any application for modification of Regulation 23(3)(a) of the B(P)R to convert such redundant carparking spaces to additional transformer rooms or other mandatory features or essential plant rooms will be favourably considered according to its special circumstances and subject to favourable comments from relevant Government departments."* The proposed conversion of an existing industrial building to a data center involves the construction of additional transformer room and switch room on the mezzanine floor as shown in the below diagram. We understand as per PNAP APP-15, the additional transformer room and switch room should be disregarded from GFA calculation. If the mezzanine floor is solely used for the additional transformer room and switch room with no GFA accountable, we opine that the GFA of the entire mezzanine floor, including circulation areas, lift shafts and staircases, could also be excluded from the GFA calculation. Please advise whether PBSCA's understanding is correct.	BD advised that comments could only be provided based on the special circumstances of individual cases. Guidelines set out in PNAP APP-150 and items 21 and 22 of ADF 3/2022 held on 13 May 2022 were relevant.

		
26.	**<u>Revitalisation of Existing Industrial Buildings – GFA Calculation of Fuel Tank Room for Generator in Data Center</u>** Continuing from the above item, the proposed conversion of an existing industrial building to a data center involves the construction of additional plant rooms, such as the Fuel Tank Room for the generator required for the operation of a data center.	BD advised that comments could only be provided based on the special circumstances of individual cases. Guidelines set out in PNAP APP-150 and items 21 and 22 of ADF 3/2022 held on 13 May 2022 were relevant.

	We understand that such Fuel Tank Room is an essential plant or mandatory feature. Is PBSCA's understanding correct? Will BD favourably consider disregarding the area of the Fuel Tank Room from GFA calculations in the proposed conversion of the redundant car parking spaces on G/F into the Fuel Tank Room circled in blue in the below diagram ?	

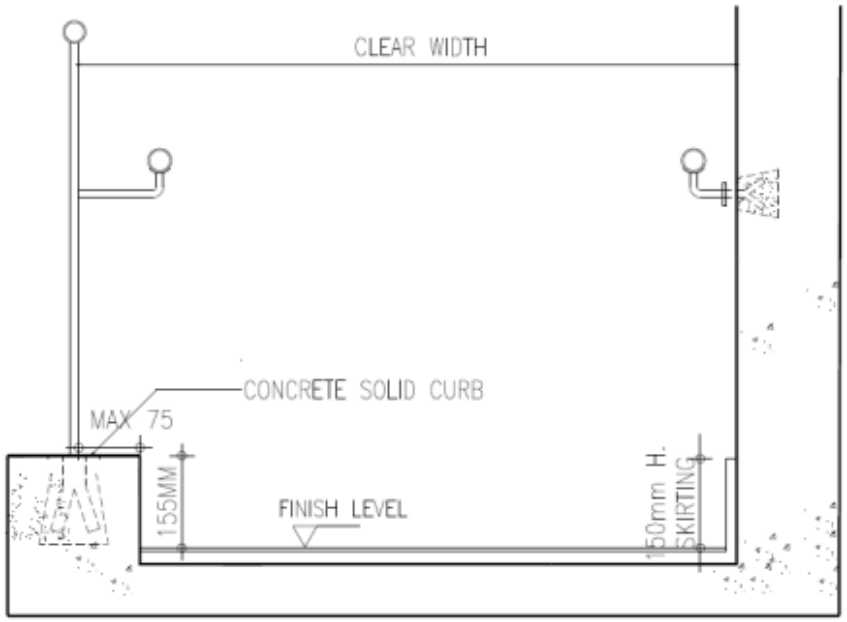

WATER TANK - G/F
1:100 @A1
10000
NEW FUEL TANK ROOM - 65.67m²
NEW MAKEUP WATER TANK B (305,000L)
NEW MAKEUP WATER TANK A (186,000L)
TBE ROOM 2 - 25.782m²
MAKE UP WATER PUMP ROOM - 33.311m²
PASSENGER LIFT-1
P.D. ROOM
LIFT LOBBY
GOODS LIFT-2
GOODS LIFT-3
LGV1
LGV2
LGV3
LGV4
LGV5
21.32m²

27.	**Revitalisation of Existing Industrial Buildings – GFA Calculation of Water Tanks and Pump Room for Air-conditioning Equipment in Data Center** Continuing from the above item, the proposed conversion of an existing industrial building to a data center involves the construction of additional plant rooms, such as water tanks and water pump room for the cooling towers serving the air-conditioning equipment required for the operation of a data center. We understand that such water tanks and water pump room should be essential plants or mandatory features. Is PBSCA's understanding is correct? Will BD consider disregarding the area of such water tanks and water pump room from GFA calculations in the proposed conversion of the redundant car parking spaces on G/F into Water Tanks A and B and the Water Pump Room circled in blue in the below diagram?	BD advised that comments could only be provided based on the special circumstances of individual cases. Guidelines set out in PNAP APP-150 and items 21 and 22 of ADF 3/2022 held on 13 May 2022 were relevant.


第 7 頁，共 17 頁
WATER TANK - G/F
1:100 @A1
10000
NEW FUEL TANK ROOM - 65.67m²
NEW MAKEUP WATER TANK B (305,000L)
NEW MAKEUP WATER TANK A (186,000L)
TBE ROOM 2 - 25.782m²
MAKE UP WATER PUMP ROOM - 33.31m²
PASSENGER LIFT-1
GOODS LIFT-2
GOODS LIFT-3
LIFT LOBBY
LGV1
LGV2
LGV3
LGV4
LGV5

	AOB Items	
28.	**<u>PNAP APP-163 on Amendments to AfEM Code</u>** (Item raised by AAP) According to item 2 of Appendix A to PNAP APP-163 (September 2024 revision), paragraph 4.2.3 of the AfEM Code was amended as follows: *"4.2.3 Where stepping onto the inaccessible roof for M&R works is required, safety measures such as guard-rails with toe-boards shall be provided at the edge of the roof in accordance with the requirements set out in paragraph 4 of Appendix D. Where it is impracticable to install permanent guard-rails around the whole perimeter of an inaccessible roof due to site constraints and/or other design considerations, subject to the conditions mentioned in paragraph 4.2.4, the following alternative shall be provided:* *(i) proprietary collapsible guard-rail system designed to resist the imposed loads and wind loads not inferior to the requirements as stipulated in B(C)R, Code of Practice for Dead and Imposed Loads (Loading Code) and Code of Practice on Wind Effects in Hong Kong; and/or* *(ii) temporary edge protection with suitable platform and access ladder designed according to the prior risk assessment[8] of the concerned M&R task.* *[8] Risk assessment for work-above-ground/work-at-height is*	BD advised that paragraph 4.2.3 of the AfEM Code aimed to allow flexibility in building design, and the design considerations mentioned in the said paragraph should be considered on case basis. Item 6 above is relevant. For small/low-rise buildings where stepping onto the inaccessible roof was not required for M&R, BD would favourably consider the use of power-operated elevating work platforms and suspended working platforms for M&R access and the non-provision of permanent guard-rails or alternative safety measures specified under paragraph 4.2.3 of the AfEM Code.

	required under Section 3 of the "Overview of Work-at-Height Safety" as published by the Labour Department and such risk assessment should be conducted in accordance with the "Five Steps to Risk Assessment" by the Labour Department." Although amendment has been issued, BD officers are still reluctant to accept fall arrest system for low-rise buildings, even for single storey buildings with metal roof (with no utility on the roof) at very low risk and low maintenance requirement, such that guard rails have to be provided at the edge of the metal roof for all low-rise buildings. Such guard rails dominate the appearance of the small buildings, jeopardise all architectural merits and cast shadow on the adjacent road affecting the streetscape as well as inducing visual distraction to drivers. Would BD please clarify the criteria of *"other design considerations"* stipulated in paragraph 4.2.3 of the AfEM Code, that will be favourably considered by and acceptable to BD?	
29.	**Curb / Skirting within Required Staircase** (Item raised by HKIA) Item 22 of ADF 2/2016 held on 18 March 2016 contained the diagram below:	BD advised that item 22 of ADF 2/2016 held on 18 March 2016 was still pertinent. However, the advice was made in the consideration that the provision of curb was required as part of the protective barrier under the relevant provisions of the B(C)R and B(P)R as well as the guidelines set out in PNAP APP-110. As the skirting was not a required provision under the BO and its allied regulations, the width of required staircases

	 BD confirmed in ADF 2/2016 that the width of the required staircase should be measured between the inner side of the balustrade and the wall finish provided that the solid curb with the width at its top on the inner side of the balustrade was not more than 75 mm. a) Would BD re-confirm if the solid curb, with the width at its top on the inner side of the balustrade not more than 75 mm, is acceptable to be situated within the required width of staircase?	should be measured to the surface of the skirting in accordance with Notes (3) of Table B2 of the FS Code. In addition, the width of the curb including the thickness of the skirting and other finishes should not exceed 75 mm. a)

	b) Would BD advise if the skirting, with its height not more than 150 mm and thickness not more than 10 mm on each side, is acceptable to be situated within the required width of staircase?	
30.	**<u>Electronic Submission Hub (ESH)</u>** (Item raised by BD) BD invited members to provide feedbacks on using ESH. Members' comments and suggestions were as follows: (a) AP's countersigning on Form BA21 was required for nomination of acting RSE/RGE. If the AP did not activate an ESH account, it would increase the processing time for paper submission. Members suggested omitting the requirement of countersigning by AP on Form BA21 upon the nomination of the acting RSE/RGE. (b) A member suggested allowing AP/RSE/RGE to assign an assistant in ESH to handle general administrative tasks for them, such as the retrieval of letters issued by BD. (c) A member reflected that the response time of ESH was too long. (d) A member suggested the acknowledgement of receipt of submissions should include the project name and address instead of BD file reference number only.	BD welcomed members' comments and suggestions and advised that: (a) A new "Project Assistant" (PA) role to handle AP/RSE/RGE's administrative tasks was introduced in February 2025. Further enhancements related to Form BA 21 would be gradually rolled out in 2025. [**Post-meeting note:** It is a prevailing requirement for the AP to countersign on Form BA21 in paper submission for the nomination of acting RSE/RGE.] (b) BD would explore the feasibility of the suggested feature. [**Post-meeting note:** Both PAs and collaborators could opt to receive the letters issued by BD for all submissions made via ESH.] (c) BD had been taking steps to improve the response time of ESH. (d) BD would incorporate the suggestion in future enhancements.

31.	**Payment of Fees on Submission of Plans for Temporary Transformer Room in Large-scale Development** (Item raised by HKIE) For large-scale developments, the provision of a temporary transformer room on site is necessary to ensure a reliable electricity supply for construction activities. We believe that the erection of such temporary transformer room, which will be demolished in a later stage of the development, should be considered an integral part of the development, and therefore, a separate plan processing fee should not be required. Would BD review the matter?	BD would consider reviewing the issue. [**Post-meeting note:** BD had reviewed the current fee charging practice, and advised that payment of fees on submission of plans was required for the said scenario.]