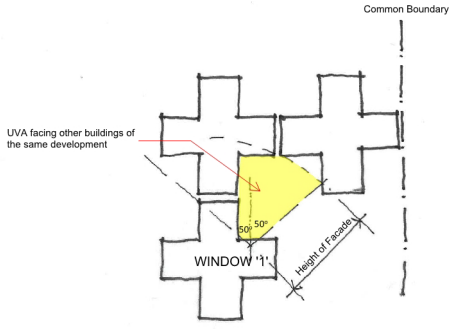
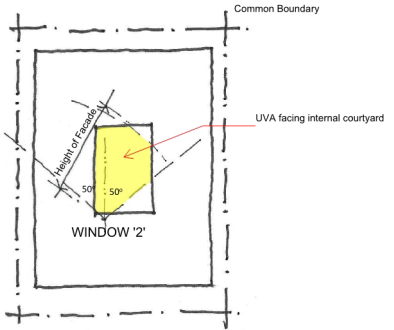


## Summary of Items Discussed in 1/2022 APSEC Discussion Forum on 14 January 2022

	Items proposed by Convenors for Discussion	Summary of Discussion and BD's Response
	<b>Items raised by HKIA</b>	
1.	<p><b><u>Application of UVA Method for Provision of Natural Lighting and Ventilation within a Courtyard of a Building</u></b></p> <p>Under PNAP APP-130, the unobstructed vision area (UVA) method is acceptable as an alternative way to demonstrate compliance of natural lighting and ventilation requirements. Please advise whether such UVA method is applicable to windows opened onto unobstructed area facing buildings and site boundary, as well as within a 4-side enclosed (but vertically unobstructed) courtyard within a building or between buildings (see Scenario 1 and 2 below).</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">  <p>Scenario 1: UVA facing other buildings of the same development</p> </div> <div style="text-align: center;">  <p>Scenario 2: UVA facing internal courtyard</p> </div> </div>	<p>BD accepted the unobstructed vision area (UVA) method to demonstrate compliance with the performance requirements. The principles and requirements of the UVA method were described in paragraphs 3.3 and 3.4 of Appendix A to PNAP APP-130. For scenarios not meeting the requirements, APs might alternatively demonstrate compliance with the above performance standards using any suitably verified and scientifically validated methods.</p> <p>According to paragraph 3.4 of Appendix A to PNAP APP-130, no window in the building should be counted for the calculation of UVA unless it faced into a space which was uncovered and not bounded on the side opposite the window by any obstruction of the building.</p> <p>Based on the above, BD advised that the UVA method was applicable to Scenario 1, but generally not applicable to Scenario 2. Subject to individual case merit, APs might discuss with the case officers including CBS for the particular issue.</p> <p>In response to HKIA's request, BD would consider reviewing the</p>

		application of the UVA method as an alternative way to demonstrate compliance with natural lighting and ventilation requirements.
2.	<p><b><u>Covered Areas under Elevated Structures and Large Projecting/Overhanging Features – JPN No. 4 and PNAP APP-19</u></b></p> <p>Under Group I in the Appendix to JPN No. 4:</p> <p>Item 1: elevated structures are not accountable for gross floor area (GFA), provided BA is satisfied that the covered areas underneath such elevated structures would not be abused; and</p> <p>Item 12: covered areas under large projecting / overhanging features are not accountable for GFA provided they fulfill the requirements in paragraph 6 of PNAP APP-19.</p> <p>(i) Please clarify whether covered areas under <b>elevated footbridges</b> between two buildings within the same site are GFA accountable, if the concerned covered areas will not be abused, due to the fact that they are used as:</p> <ul style="list-style-type: none"> <li>- EVA with footpath;</li> <li>- Driveway for vehicles; and/or</li> <li>- Planters, etc.</li> </ul> <p>(ii) Please clarify if items 1 and 12 apply to <b>building setback area</b> covered by the upper part of the building which fulfills the</p>	<p>BD advised that, in general, the covered areas under the elevated footbridge between two buildings were GFA accountable under regulation 23(3)(a) of B(P)R. If the covered areas were used as EVA with footpath / driveway / planters of genuine design, or were designated as common parts of the building satisfying the requirements in paragraph 6 of PNAP APP-19, BD would pragmatically consider excluding such covered areas from GFA calculation under regulation 23(3)(b) of B(P)R on its case merits, provided that the covered areas were open in design and abuse was unlikely. Similar item was also mentioned in item 5 of ADF 5/2021 held on 12 November 2021.</p> <p>Elevated structures under Item 1 of Group I in the Appendix to JPN No. 4 referred to elevated platforms over sloping site, e.g. elevated garden areas and terraces, which were irrelevant to building setback area.</p> <p>For covered areas under projecting / overhanging features under Item 12 of Group I, if the projecting / overhanging features satisfied the requirements in paragraph 6 of PNAP APP-19, BD would pragmatically consider excluding the covered areas from GFA calculation on its case</p>

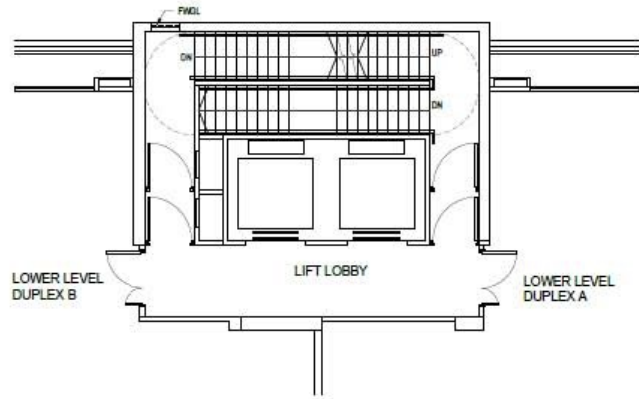
	<p>requirement under paragraph 6 of PNAP APP-19.</p>	<p>merits.</p>
<p>3.</p>	<p><b><u>Clause B20.9 of Code of Practice for Fire Safety in Buildings 2011 (FS Code) – Provision of Thoroughfare for Cinemas or Theatres of Capacity not more than 500 Persons</u></b></p> <p>Regarding item 14 of the Summary of Items Discussed in ADF 4/2018 held on 17 August 2018, BD advised that favourable consideration would be given on case basis in extending the relaxation under Clause B20.9 of FS Code to cover cinemas and theatres in a non-domestic building not having polluting industrial undertakings or the non-domestic portion of a composite building, such that the site of such premises might be permitted to abut on one thoroughfare if the said thoroughfare was an acceptable EVA and the Director of Fire Services had no adverse comment on the arrangement. BD further advised that Clause B20.9 of FS Code would be amended to reflect the above arrangement in due course.</p> <p>In this regard, we would like to enquire on the following:</p> <ul style="list-style-type: none"> <li>(i) Status of the abovementioned amendment; and</li> <li>(ii) Whether or not before the amendment of the said clause, AP could make reference to the abovementioned Summary of Items Discussed in the general building plan (GBP) submissions of proposed building involving cinemas/theatres of capacity not more than 500 persons to abut on one thoroughfare for BD’s consideration/approval.</li> </ul>	<p>BD advised that the revision of Clause B20.9 of FS Code was in progress.</p> <p>Before the upcoming amendment of the FS Code, item 14 of the Summary of Items Discussed in ADF 4/2018 held on 17 August 2018 was still valid.</p>

<p>4.</p>	<p><b><u>Areas/Spaces for Accommodating Parking Information System</u></b></p> <p>As a government policy, parking information system has recently been required to be provided in new developments to the satisfaction of the Commissioner of Transport (C for T) via the lease control regime. Relevant clauses are included in new leases which require, inter alia, the lessee to designate areas or spaces within the development for accommodating facilities, installations and equipment for the purpose of submitting information regarding parking spaces of motor vehicles, including the number of vacant spaces, to C for T.</p> <p>We would like to enquire if BD will likewise disregard the areas/spaces or rooms for accommodating such facilities, installations and equipment of the requisite parking information system from GFA calculation, similar to M/E plant rooms for accommodating equipment/installation for EV charging enabling provisions.</p>	<p>BD advised that according to the Guidelines for Provision of Parking Information issued by the Transport Department, the developer should submit a layout plan indicating the designated common area for accommodating the facilities, installations and equipment to provide parking information to Commissioner for Transport's (C for T) approval.</p> <p>In deciding on the areas of car parks including driveway and any associated facilities that could be disregarded from GFA calculation, BD would take into considerations if the car park is of genuine design and the spaces for such facilities are of reasonable size and to the satisfaction of C for T. This applied to parking information facilities.</p>
<p>5.</p>	<p><b><u>Rooftop Staircase Hoods of Residential Developments – JPN No. 4</u></b></p> <p>Regarding item 20 of ADF 5/2019 held on 22 November 2019, BD replied that whether GFA would be accountable for the staircase hood on roof of a private staircase linking the top floor to the roof would be considered on a case-by-case basis.</p> <p>Subsequent to the above discussion, the recent revision of JPN No. 4 stipulates that rooftop staircase hoods of residential developments are not</p>	<p>BD advised that the staircase hood of a private staircase linking the top floor to the roof might be non-accountable for GFA calculation provided that the size of the staircase hood was not excessive and that no other building facilities, features and structures at roof were accountable for GFA.</p> <p>There had not been any change in BD's requirement. The revised JPN</p>

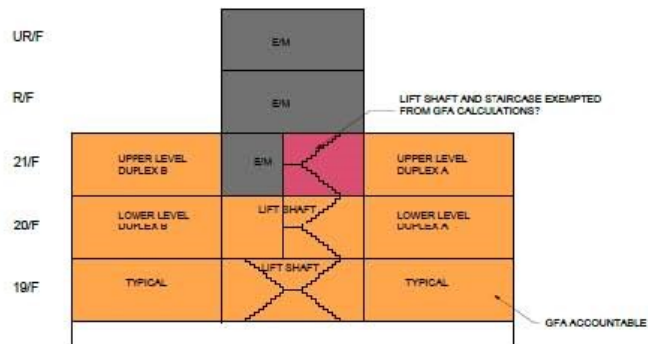
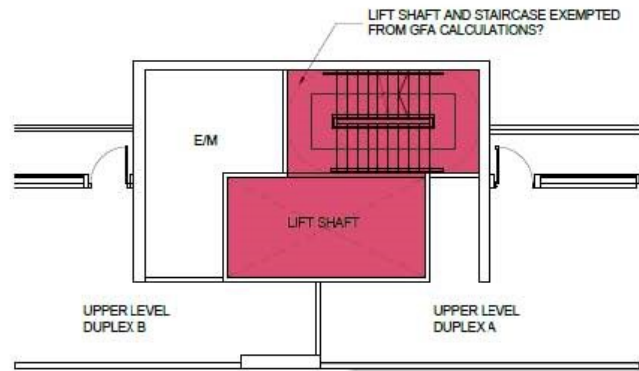
	<p>counted towards GFA calculation provided that the size of the staircase hood is not excessive and that no other building facilities, features and structures at roof are accountable for GFA.</p> <p>In light of the above, can BD please clarify that provided the criteria in JPN No. 4 are met, the staircase hoods of private staircases on roof level in residential developments would not be GFA accountable, despite the fact that the first GBP is submitted before the effective date of the current revision of JPN No. 4.</p>	<p>No. 4 was issued to align the practices in determining the GFA accountability amongst BD, LandsD, and PlanD.</p>
<p><b>Items raised by HKIE</b></p>		
<p>6.</p>	<p><b><u>Acceptance of Hoarding Plan Prior to Approval of Demolition Plan</u></b></p> <p>Recently, it is noticed that a demolition plan was not approved by BD because the hoarding plan had not yet been accepted. Would BD please clarify whether the acceptance of hoarding proposal is a pre-requisite for demolition plan approval?</p>	<p>BD advised that according to paragraph 1(a) of Appendix D to PNAP ADM-19, precautionary measures particularly the hoarding, covered walkways and any necessary propping and shoring were the fundamental issues to be considered in processing demolition plans. While acceptance of hoarding proposal was not a pre-requisite for approval of demolition plans under the Buildings Ordinance, adequate precautionary and protective measures for the demolition works should be included in the demolition plans submitted for approval. Regulation 8(3) of Building (Administration) Regulations, Section 3 of the Code of Practice for Demolition of Buildings 2004 and PNAP APP-21 referred.</p>

7.	<p><b><u>Safety Certificate for Hoardings / Covered Walkways or Gantries – PNAP APP-23</u></b></p> <p>PNAP APP-23 requires AP/RSE to sign and submit the safety certificates provided in its Appendices F, G and H, in which the AP/RSE confirms their personal inspection by signing “... <i>hereby certify that I have inspected the hoarding, covered walkways and gantries erected at ...</i>” during annual safety certification, renewal application and minor amendment. As these routine inspection are conducted by AP/RSE’s representatives, it is recommended to slightly amend the wordings of certificates as below:-</p> <p>“... hereby certify that <b>my representative</b> has inspected the hoarding...”</p>	<p>BD advised that the proposed amendment was considered not acceptable. The objective of the self-certification scheme was to promote self-discipline of AP/RSE and to facilitate the development progress in compliance with the requirements under PNAP APP-23. It was crucial for AP/RSE to conduct the inspection in person to maintain a high standard of self-regulation and to safeguard the safety of the public and the workers on sites.</p>
<b>Items raised by AAP</b>		
8.	<p><b><u>GFA Calculation in Duplex Unit</u></b></p> <p>PNAP APP-2 stipulates that the horizontal area of a staircase may be disregarded/exempted from GFA if it solely serves floors accepted as not being accountable for GFA. Would BD please advise if the horizontal area of a circulation staircase on the upper floor of a duplex unit and the adjoining lift shaft may be exempted from GFA calculation, if there are no doors from the staircase or the lift shaft opened to the residential floor in question and the staircase leads up to the roof floor which is accepted as not being accountable for GFA.</p>	<p>BD advised that in the case as per the attached diagrams, the horizontal areas of the staircase and the lift shaft may be exempted from GFA calculation.</p>

20/F



21/F



<p>9.</p>	<p><b><u>Requirements for Accessible Lifts</u></b></p> <p>According to Division 19 of the Design Manual: Barrier Free Access 2008, paragraph 78(2) states that “<i>Where there are more than three lifts in a building, access shall be provided to every floor by at least one lift having minimum internal car dimensions of 1500 mm x 1400 mm (either wide or deep) with a minimum clear entrance width of 850 mm.</i>”</p> <p>To our understanding, “more than three lifts in a building” should mean “more than three lifts in a group of lifts serving the same zone”. Please confirm if our understanding is correct.</p>	<p>BD advised that according to Division 19 of the Design Manual: Barrier Free Access 2008, paragraph 78(2), “more than three lifts in a building” should mean more than three (i.e. four or more) lifts in the whole building instead of in a group of lifts serving the same zone.</p>
<p><b>Items raised by PBSCA</b></p>		
<p>10.</p>	<p><b><u>Streamlining the Plan Approval Process</u></b></p> <p>(i) BD’s officers often asked the staff of our members to make several times of visits to the office of BD for rectifying minor amendments of plans before giving approvals, even the plans were not final amendment plans .</p> <p>Could BD’s officers make comments and review amendments via email or telephone to reduce the number of amendments / visits by our members?</p> <p>(ii) Essentially, BD should carry out curtailed check on plans but it seems to us that each and every detail of the submitted plans was checked</p>	<p>BD reminded the statutory duties of AP in complying with the provisions under the BO and its subsidiary regulations and advised that good quality of the building plans prepared by AP would definitely relief the workload of AP and BD’s staff arising from amendments necessary for approval.</p> <p>BD had been exploring means to facilitate the early approval of building plans. One of the ideas was to categorise essential information to be provided at various critical stages, e.g. obtaining the first GBP approval, applying for the first superstructure consent and occupation permit. In addition, in order to simplify the GBP submission, certain details as</p>



everytime and our members had to amend the plans to address all the comments. Could BD allow minor comments (such as those on the UFA table) to be addressed later upon the final amendment plan submission so as to streamline the process, similar to the practice adopted at the special work arrangements earlier the year?

required according to current practice were proposed to be trimmed down. In this connection, draft revised PNAP ADV-33 was being prepared and would be circulated for BSC and APSEC Members' comments in due course.

In general, AP might communicate with BD's officers on necessary amendments for approval via email, telephone or video conferencing before visiting BD's office. To facilitate the above, BD had stepped up efforts in adopting appropriate information technology provisions which include (i) assigning a dedicated email box to strengthen the communications with applicants and practitioners, (ii) encouraging practitioners to provide an e-copy of drawings/supporting calculations & reports or hyperlink for accessing the soft copy with their submissions, and (iii) holding video conferences to facilitate deliberation and plan vetting process. Apart from the above, upon incorporating necessary amendments into the plans, AP might choose to submit replacement plans instead of making amendments on the submitted plans.

With respect to the approval of plans with deferred outstanding issues to be addressed in subsequent amendment submission, it was a stopgap measure for facilitating the approval of plans under the special working arrangement during the COVID-19 epidemic. From the feedback and experience gained in the past, it would induce extra workload for AP in preparing and making an additional submission to rectify the irregularities on the approved plans. The adoption of this approach would be considered on individual case merit.

11.	<p><b><u>BD’s Resources for Approval of Plans</u></b></p> <p>While we appreciate BD’s effort in approving GBPs, members have recently reflected that the approvals of GBPs were usually dated back for two to three weeks. We understand that BD has been processing a lot of submissions. We appreciate that BD could allow sufficient resources to approve plans within the time frame.</p>	<p>BD clarified that the letters of approval were dated on the day of the approval. BD also explained the administrative procedures for despatch of the approval plans to AP</p> <p>BD would monitor situation on plan processing and would ensure that the time lag between the approval of plan by BD and dispatch of approved plans to AP would be kept minimal.</p>
	<b>AOB Items</b>	
12.	<p><b><u>Special Work Arrangement of New Buildings Divisions of BD</u></b> (Item raised by BD)</p> <p>BD clarifies that no “work from home” arrangement is adopted by the New Buildings Divisions (NBDs) of BD. Further to the Special Work Arrangement announced in BD’s Notice to Registered Building professionals and Registered Contractors dated 7 January 2022, BD updates that the AP/RSE Rooms in the NBDs’ offices will be closed until further notice. To implement targeted social distancing and infection control measures, communications with case officers should be carried out via telephone, email or video conferencing. “Drop-in” points have been set up in the lobbies of the respective floors of NBDs’ offices for the return of amended plans. The AP/RSE/RGE should then notify the respective case officers for collection.</p>	<p>Members noted and would follow the updated arrangement accordingly.</p>

13.	<p><b><u>Quality Supervision in Factories by Grade T1 TCP of RC's Stream</u></b> (Item raised by HKIA)</p> <p>Precast concrete construction, tempered glass and MiC, which are widely adopted in the construction industry, are mostly fabricated in factories in the Mainland. Quality Supervisions are to be provided by AP, RSE and RC in accordance with the relevant requirements in the PNAPs and approval letters. Under the stepped up cross-boundary control as one of the anti-epidemic measures, BD issued a Circular Letter dated 7 February 2020 adopting a pragmatic and flexible approach to accept alternative arrangements for meeting supervision requirements. The alternative arrangements only cover grade T3 TCP whilst the RC still have to assign a quality control supervisor to provide full-time continuous supervision in the factory. The minimum qualifications and experience of the quality control supervisors assigned by the RC are to be the same as grade T1 TCP under the RC's stream, as stipulated in the Code of Practice for Site Supervision 2009.</p> <p>With the recent outbreak of COVID-19 variant (Omicron), it is noted that many cities in the Mainland including Shanghai, Dalian, Tianjin and Shenzhen have further tightened the anti-pandemic control by the lockdown of the cities. Because of this, grade T1 TCP of RC's stream cannot enter the cities to carry out the quality supervision and the supply chains are largely affected.</p>	<p>BD advised that the Circular Letter dated 7 February 2020 was under review and Members' concern would be considered.</p>

	<p>Would BD consider further alternative arrangements, e.g. supervision by videotelephony, to cover the quality supervision of grade T1 TCP of RC Stream in factories?</p>	
<p>14.</p>	<p><b><u>Flexibility in Site Coverage and Open Space Provision for A&amp;A Works – PNAP APP-132</u></b> (Item raised by HKIA)</p> <p>Under PNAP APP-132, in order to allow “greater flexibility in the design of buildings” for “the application of the site coverage and open space provisions under the B(P)R” and to “facilitate innovative building designs, the BA is prepared to consider applications for more flexible application of the requirements under Regulations 20 and 25 of the B(P)R and modify the provisions thereof...”.</p> <p>We would like to clarify if such allowance of “more flexible application of the requirements under regulations 20 and 25 of the B(P)R” is also applicable to A&amp;A works as long as the criteria mentioned in paragraph 3 or 4 of the PNAP are being fulfilled. An example is to remove certain podium portion of an existing non-domestic building such that the setback of the building of an area not less than 8% of the site area can be fulfilled.</p>	<p>BD advised that the flexible site coverage under PNAP APP-132 was only applicable to new developments, subject to the pre-requisites set out under PNAP APP-151 and PNAP APP-152. It is not applicable to A&amp;A works.</p>
<p>15.</p>	<p><b><u>Performance-based Approach to Demonstrate Compliance with Natural Lighting and Ventilation Requirements</u></b> (Item raised by AAP)</p>	

<p>To follow up on with Item 1, regarding the “Performance-based Approach” to demonstrate the compliance with natural lighting and ventilation requirements, BD may consider setting up a working group to review some of the requirements and cases on which the building industry has raised their concerns. In this connection, BD is invited to review the criteria set out under item 4(iii) in the Guidance Notes on Validation of Lighting Simulation Software, Appendix B to PNAP APP-130, regarding the material “reflectance” settings to be adopted in the validation test.</p> <p>When PNAP APP-130 was first released in December 2003, the material “reflectance” index adopted on vertical surfaces had to be site specific, with reference to the design guidelines of “Daylighting and Window Design - Lighting Guide LG 10:1999”, published by the Chartered Institution of Building Services Engineers (CIBSE). Such “reflectance” index normally ranges from 0.4 to 0.6, which represents the colour of the existing building surrounding as beige or medium grey ceramic tiles. PNAP APP-156 stipulated that the external reflectance of glazing which forms part of the building envelope such as curtain wall and window of a residential building, should not exceed 20% (0.2). The same value is rigidly adopted as the “reflectance” index in the aforesaid lighting simulation software, which drastically reduces the effective lighting reflection. In this regard, would BD please review whether the adoption of such “reflectance” index can be site specific, rather than being set to a generic value of “0.2” to enable a realistic simulation result.</p>	<p>BD would look into the issue.</p>
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16.	<p><b><u>Vote of Thanks</u></b> (Item raised by BD)</p> <p>AD/NB1 proposed a vote of thanks to Mr HO Hon-kit, Humphrey, AD/NB2 who attended this Forum for the last time before proceeding on pre-retirement leave.</p>	<p>Members supported the vote of thanks to Mr HO and wished him a happy retirement.</p>