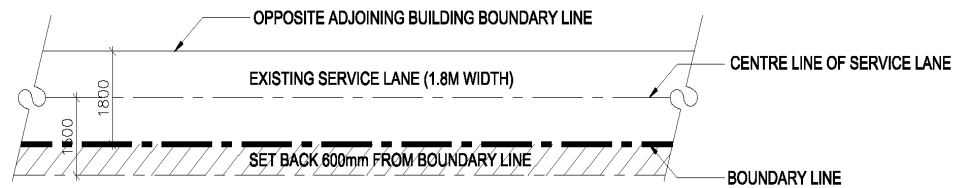


Summary of Items Discussed in 2/2021 APSEC Discussion Forum on 19 March 2021

	Items proposed by Convenors for Discussion	Summary of Discussion and BD's Response
	Items raised by HKIA	
1.	<p><u>Mechanical Ventilation of Room Containing Waste Fitment</u></p> <p>According to item 3 of ADF 2/2017 held on 17 March 2017, BD advised that a 1.5m x 1.5m notional floor area per sink/basin for calculation of the air change requirement for mechanical ventilation was acceptable for institutional use, provided that the exhaust outlet should be located in the vicinity of the fitment. BD further advised that the said assessment criteria could be applicable to shops or offices as well.</p> <p>However, in some recent submissions, the provision of a sink in the open pantry located within an open office is not allowed even if the natural ventilation requirements under Building (Planning) Regulation (B(P)R) 36 are complied with. With the current trend of co-working spaces in office planning, the provision of open pantry with sink within the office area is a highly demanded and well received feature in modern office.</p> <p>Would BD please advise if the said provision is acceptable under the current regulations and that the assessment criteria as mentioned above is still applicable to office and/or shops.</p>	<p>BD advised that the assessment criteria as mentioned in item 3 of ADF 2/2017 held on 17 March 2017 remained unchanged. The application of a notional area of 1.5m x 1.5m per sink/basin in the calculation of window requirements for large rooms would be favourably considered on a case basis. The provision should be commensurate with the size, layout and overall design of the building as well as the likelihood of abuse.</p>

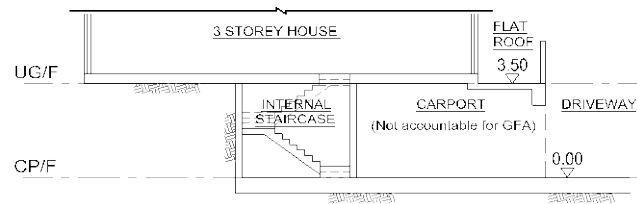
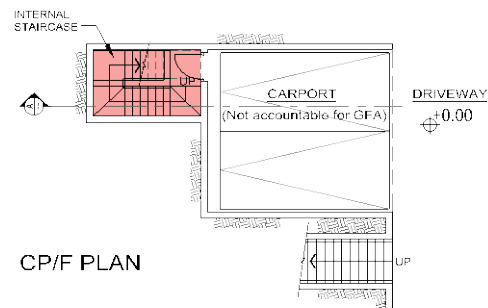
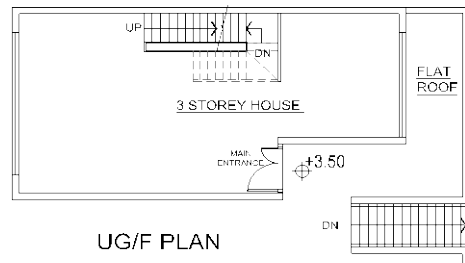
2.	<p><u>Service Lane</u></p> <p>Referring to item 15 of ADF 4/2020 held on 26 November 2020 (below diagram refers), BD advised that where the existing 1.8m service lane was a private lane (no matter the site had the right of way over such private lane), a setback of 1.5m should be provided.</p> <p>With an existing private lane of 1.8m that the owner of the subject site is expressly granted with a right of way, we opine that a setback of only 1.2m from the site boundary should suffice for providing a service lane of not less than 3m upon full development of the two adjoining sites, which fulfil the long term objective pursuant to paragraph 10 of PNAP APP-73.</p> <p>Would BD please clarify if the above is acceptable, providing that a copy of legal instrument (e.g. deed of right of way) can be submitted by the building owner/authorized person to prove that the building owner is expressly granted, by virtue of the instrument, a right of way exercisable at all times over the said private lane.</p>	<p>BD advised that as per B(P)R 28, 1.5m service lane should be provided within the site of the building. The proposed setback of only 1.2m from the site boundary was considered not acceptable.</p>
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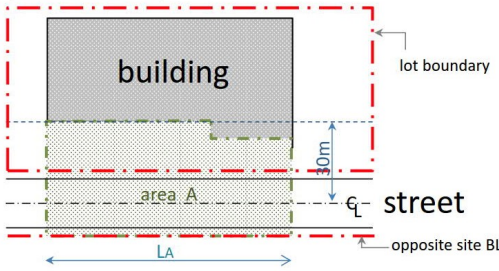
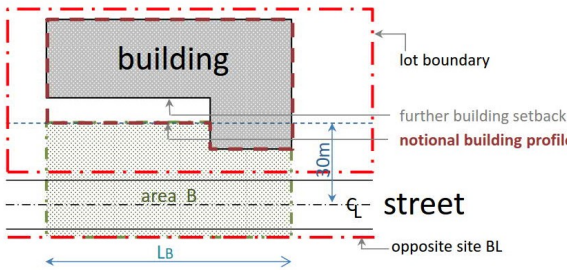
PLAN OF EXISTING SERVICE LANE (SCENARIO 1)
(CLASS A SITE)

3. **PNAP APP-2 - Non-Accountable Gross Floor Area**
- Referring to item 11 of ADF 2/2020 held on 29 May 2020, BD confirmed that where staircases and lift shafts solely served floors accepted as not being accountable for GFA, the area of the features might also be discounted.
- For house development with first residential floor located at UG/F due to topographical feature (below diagram refers), it is our understanding that the internal staircase (coloured pink) solely serving the carport (not accountable for GFA) should also be discounted from GFA calculation.
- Please advise if our understanding is correct.

BD advised that in general, the internal staircase solely serving the carport (not accountable for GFA) in house-type development should not be accountable for GFA. However, it was not uncommon that private carports under houses were enclosed for unauthorised use. In this connection, layouts that prone to abuse would not be accepted.



4.	<p><u>PNAP APP-152 – U & Max. Permissible Lp</u></p> <p>According to paragraph 2.3 of Appendix B of PNAP APP-152, if only a part of the building is within 30m from the centreline of the street, U is the mean width of the street canyon that abuts such part of the building as shown in Scenario A. We would like to enquire if it is acceptable to adopt a “notional building profile” when assessing the mean width of the street canyon where more setback area is indeed provided for better street environment as shown in Scenario B.</p>	<p>BD advised that according to paragraph 2.3 of Appendix B under PNAP APP-152, U was the mean width of the street canyon that abutted such part of the building within 30m from the centreline of the street. It served the purpose of determining the maximum permissible Lp in which no notional building profile would be allowed. Figure B7 in Appendix B of PNAP APP-152 was relevant.</p> <p>According to paragraph 12 of PNAP APP-152, in recognition of such genuine constraints in meeting the prescriptive requirements, the BA takes a flexible and pragmatic stance when considering applicants’ proposals holistically to achieve the objectives of the SBD Guidelines. In this regards, AP may consider to adopt the alternative approaches set out in Appendix E to PNAP APP-152.</p>
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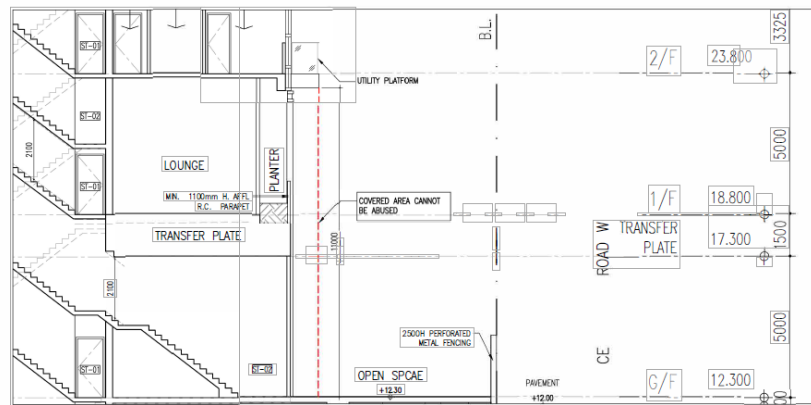
	<p>Scenario A</p>  <p>lot boundary</p> <p>building</p> <p>10m</p> <p>area A</p> <p>street</p> <p>opposite site BL</p> <p>L_A</p> <p>$U_A = \text{area A} / L_A$</p> <p>Scenario B</p>  <p>lot boundary</p> <p>building</p> <p>10m</p> <p>area B</p> <p>street</p> <p>opposite site BL</p> <p>L_B</p> <p>notional building profile</p> <p>further building setback</p> <p>$U_B = \text{area B} / L_B$</p>	
5.	<p><u>PNAP APP-130</u></p> <p>Item 8 of ADF 2/2015 held on 20 March 2015 acknowledged that HKIA's understanding, i.e. <i>Part III of Appendix A of PNAP APP-130 on guidelines on adoption of performance-based standards for natural ventilation could be applied to a room where the window could only meet the prescriptive natural lighting requirement under B(P)R 31 but not the performance requirement using UVA method</i>, was correct.</p>	<p>BD advised that HKIA's understanding was correct.</p>

	<p>Based on the above, it has all along been our understanding that the whole of Part III of Appendix A of the said PNAP, including paragraph 4.2 and Section 5 – Cross Ventilation, can be applied to a room where the “primary opening” is a window satisfying the natural lighting requirements stipulated under B(P)R 31 only.</p> <p>We would like to re-confirm that the above interpretation/understanding is still valid and applicable.</p>	
	Items raised by HKIE	
6.	<p><u>Ground-borne Vibration Limit</u></p> <p>Paragraph 3 of Appendix A of PNAP APP-137 specifies that a vibration limit of 15mm/s can be adopted for robust and stable buildings. Only in the case where there are vibration sensitive/dilapidated buildings nearby, the vibration limit has to be reduced to 7.5mm/s. Recently, there are few cases where BD officers tighten the maximum vibration limit to 7.5mm/s for the approval of piling plans despite that the structural condition of the adjoining buildings, which are founded on piles, is in a fair to good condition.</p> <p>Would BD please clarify the above requirements.</p>	<p>BD advised that the guide value of maximum ppv as given in Appendix A to PNAP APP-137 should be followed. The vibration limits for robust and stable buildings under transient vibration and continuous vibration are 15mm/s and 7.5mm/s respectively.</p>

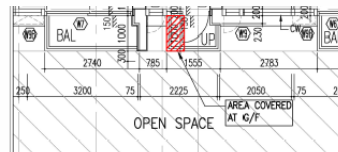
7.	<p><u>Monitoring Requirements for Piling Works</u></p> <p>The guideline in Appendix B of APP-137 suggests AAA levels be established with a ratio of Alert: Alarm: Action level = 50%, 75% and 100% of allowable/predicted value. Nowadays, the Alert and Alarm Levels are tightened to 30% and 50% of the maximum vibration limit respectively during some piling plan approvals. The Alert level, in particular for vibration control, becomes unrealistic in most cases as the value will be exceeded and such small degree of vibration can be triggered by activities other than the piling works (e.g. traffic nearby).</p> <p>The present set of vibration control limits and principle has been in force since 2004. No major structural damage to adjoining buildings has been encountered in piling operations. It is considered that the present set of vibration limits are sufficient to safeguard the safety of buildings adjoining piling sites. Would BD please consider to maintain the practices given in the PNAP.</p>	<p>BD advised that while the ratio of AAA levels was not mentioned in PNAP APP-137 for vibration limit, a ratio of 50%, 75% and 100% was normally acceptable for non-sensitive buildings/structures. A more stringent requirements might be imposed to control the vibration on adjacent dilapidated and/or sensitive buildings on a case by case basis and a test pile proposal to confirm the magnitude of ground-borne vibrations may be necessary.</p> <p>Members of HKIE suggested that reference could be made to vibration control of heritage building with an AAA levels as 5/6/7.5 mm/s. BD would further consider HKIE's suggestion.</p>
8.	<p><u>Re-use of Existing Foundations</u></p> <p>Under Clause 6.5 of CoP for Foundation 2017, a comprehensive testing scheme should be implemented to demonstrate the existing foundation is suitable for re-use. Would BD please advise whether such testing scheme is a consent condition rather than approval condition as some of the tests can only be carried out when the foundation is exposed.</p>	<p>Usually, a comprehensive testing scheme to verify the integrity, durability, suitability of the existing foundations to be reused would need to be submitted together with the foundation plan or specified on the foundation plan for approval. The requirement for submission of design review report, including the result/finding of the verification tests or investigation proposed in the testing scheme, for the existing</p>

		<p>foundation to be re-used might be imposed for the consent application to the commencement of new foundation works. The consent for such works would not be given until the said report has been submitted and found satisfactory by BD.</p> <p>The approval and consent conditions imposed for foundation works involving re-use of existing foundation might vary and be considered on case-by-case basis. In some cases, approval and consent for carrying out the verification tests of the existing foundation might be required.</p>
9.	<p><u>Streamlined Procedure to Facilitate the Processing of Form BA13/14 Submission</u></p> <p>Referring to item 6 of ADF 4/2018 held on 17 August 2018, BD had implemented a streamlined procedure and would issue a reminder with sample checklists to AP/RSE/RGE for timely submission of the required technical documents prior to Form BA13/14 submission. Sample letter and summary table from BD are attached for easy reference.</p> <div data-bbox="250 1007 315 1067" data-label="Image"> </div> <p>Sample letter and summary table.pdf</p> <p>However, it is noted that the sample table is not acceptable by case Technical Officers (TOs) in most of the cases and the submission requirements vary amongst different teams. To facilitate smooth processing of these submissions, would BD please unify and provide a</p>	<p>BD advised that the summary table only served the purpose as a sample for the RSE to follow. RSE should make appropriate modification to ensure all relevant conditions and requirements imposed in the approvals were incorporated in the table. BD was also considering to include this summary table together with other checklists in the PNAP APP-13.</p> <p>Members of HKIE clarified that the inconsistent practice mainly occurred in the processing of Form BA14 for piling works. The requirements on the format of record plans varied amongst TOs in different team and information contained in the piling report was required to be shown in the record plans.</p> <p>BD requested HKIE's representatives to provide relevant information</p>

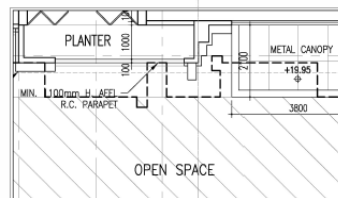
	standard format for the Industry use.	and examples of record plans for BD's consideration. [Post Meeting Note: Members of HKIE provided examples of record plans for BD's consideration via e-mail on 26 March 2021.]
	Items raised by HKIS	
10.	<p><u>Recessed Discharged Point at Ground Storey</u></p> <p>Referring to item 9 of ADF 2/2012 held on 16 March 2012, BD advised that the ground storey discharge point which was recessed from the ultimate edge of the building (recessed covered area) would be counted for SC and PR.</p> <p>Recently, some BD officers requested the calculation of SC and PR for the exit route from staircase on ground storey common area under the cover of balcony/UP, in which the balcony/UP was more than 10m above the ground storey as shown in below diagram. It is opined that the balcony/UP at such height does not constitute any effective covering and abuse of use is unlikely. For this case, would BD consider disregard the SC and PR calculation for such location as the abuse of use is highly unlikely.</p>	BD advised that as per item 9 of ADF 2/2012 held on 16 March 2012, the covered area of recessed MOE discharge point should be counted for SC and PR.



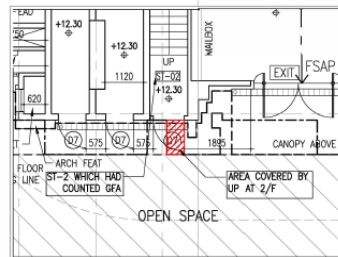
SECTION FROM G/F-2/E (1:100)



PART PLAN OF 2/F (1:100)



PART PLAN OF 1/F (1:100)

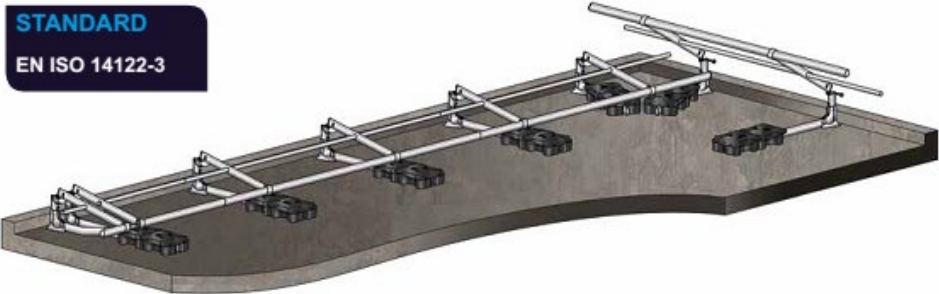


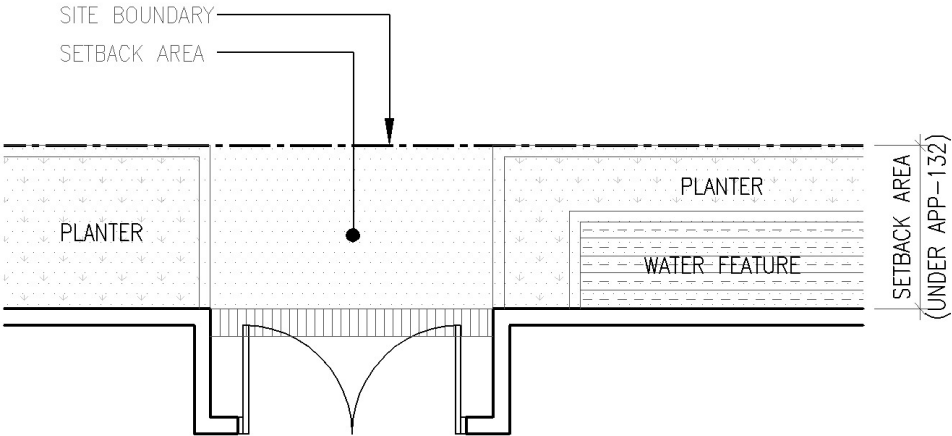
PART PLAN OF G/F (1:100)

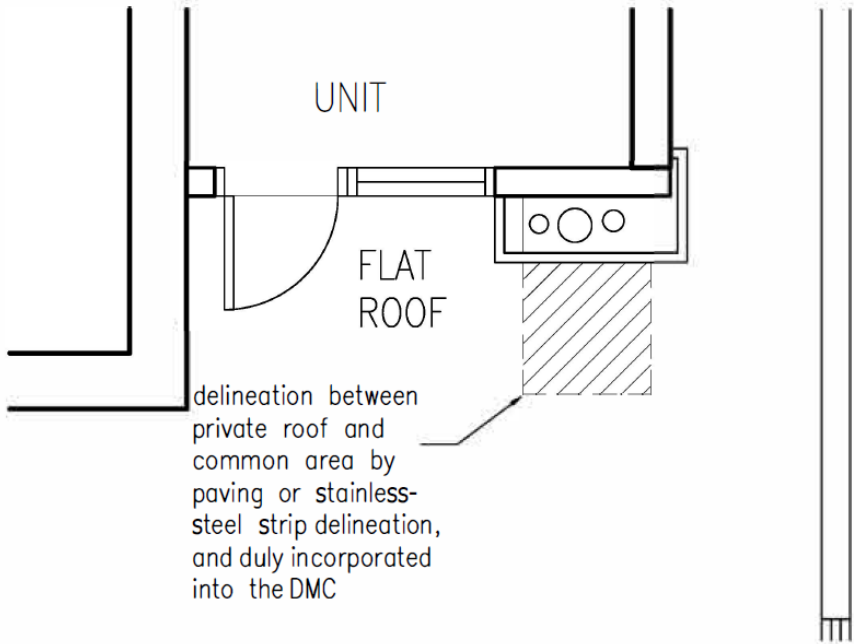
11.	<p><u>Relocation of Kowloon Section of New Buildings Division (NBD) 1 and Kowloon Unit of NBD 2</u></p> <p>Further to the relocation of Kowloon Section of NBD 1 and Kowloon Unit of Kowloon and Rail Section of NBD 2 to Kwun Tong Office on 1 February 2021, there was a case that the approved A&A plans could only be collected one month after from the date of approval.</p> <p>We suggest to improve the situation by considering if the approved plans can be collected at Kwun Tong Office so as to reduce the collection time.</p>	<p>BD advised that dispatch of approved plans or other documents to AP/RSE might have suffered a short delay in February 2021 due to the office relocation. The services was found resumed normal with daily delivery of the plans and documents arranged between Taikoo Wan Office and Kwun Tong Office to avoid delays.</p> <p>In response to HKIS's suggestion, BD advised that Kwun Tong Office was a small sectional office and could not afford the space and staff for setting up a receipt and dispatch counter.</p>
12.	<p><u>Streamline the Approval Process</u></p> <p>For approval of A&A submissions with modification/exemptions granted, it is required to incorporate a summary of items covered by valid Form BD106 in the subsequent amendment plans for approval before the Form BA14 is submitted.</p> <p>While a month's time is required for the subsequent approval, in order to streamline the approval process, it is suggested that the summary of valid Form BD106 table to be inserted on plans and the modifications/exemptions granted during the same approval can be recorded simultaneously. (i.e no need to submit subsequent amendments plans for approval.)</p>	<p>BD advised that the suggested arrangement was not acceptable. In particular, different conditions might be imposed upon granting of modifications/exemption and approval of plans.</p> <p>Notwithstanding, the AP might communicate with the case officers to expedite the processing of amendment plans solely involving the updating of valid Form BD 106.</p>

	Would BD accept this arrangement?	
13.	<p><u>Determination of Existing Foundation Design for a Pre-war Building</u></p> <p>For some development adjoining to a pre-war building which the building record is not available, would BD accept Ground-penetrating radar (GPR) survey (same technique adopted by CEDD and MTR) to determine the existing foundation design of that pre-war building in order to fulfil the current Foundation code requirements as the carry out of trial pit may not be possible due to access issue?</p>	<p>While BD would not impose restriction on the application of geophysical method for conducting site survey to collect sufficient information for the foundation design, the AP/RSE should ensure the accuracy of the GPR survey was adequate and the reliability on interpreting the survey results could fulfil the purpose of the site survey. Section 3.3 of the CoP for Foundations 2017 was relevant.</p>
	Items raised by AAP	
14.	<p><u>Calculation of GFA Concession for Car Park Ancillary Areas</u></p> <p>As stipulated in paragraph 10 of Appendix C of PNAP APP-2,“<i>..For cases where run-in/out or driveway at ground level serve loading and unloading areas at ground level or underground but also serve car parking spaces aboveground entitling only 50% GFA concessions, the percentage of GFA concessions of such run-in/out or driveway areas will be calculated on a pro-rata apportionment basis judging on the merits of each individual cases.</i>”</p> <p>Our interpretation is that:</p>	<p>BD advised that as per paragraph 10 of Appendix C to PNAP APP-2, the principle of calculations should be on a pro-rata basis and the quoted examples by AAP might not cover all the scenarios. In this connection, BD would provide further guidelines on the calculation for practitioners’ reference.</p>

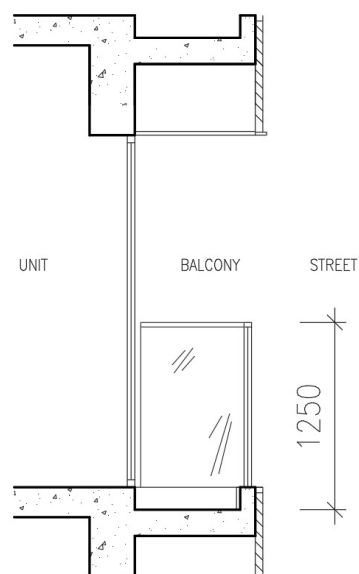
	<p>i. For covered run-in/out or driveway at ground level serving car parking spaces and loading / unloading bays which entitle 100% GFA concessions, the run-in/out or driveway will also be entitled to 100% GFA concessions;</p> <p>ii. For covered run-in/out or driveway at ground level serving car parking spaces and loading / unloading bays which entitle 50% GFA concessions, the run-in/out or driveway will be entitled to 50% GFA concessions;</p> <p>iii. For covered run-in/out or driveway at ground level serving loading / unloading bays and car parking spaces and part of the loading / unloading bays and car parking spaces entitle only 50% GFA concessions, the accountable GFA for the covered run-in/out or driveway should be calculated by the following formula:</p> <p>Accountable GFA = A x B / C x 50%, where</p> <p>A = Area of covered run-in/out or driveway B = Area of loading / unloading bays and car parking spaces entitling 50% concession C = Area of all loading / unloading bays and car parking spaces</p> <p>Would BD please confirm if our understanding is correct.</p>	
15.	<p><u>Safety Measures for Inaccessible Roof</u></p> <p>Further to item 4 discussed in ADF 1/2021 held on 22 January 2021,</p>	BD advised that the matter should be considered holistically and

	<p>according to paragraph 4.2.3 in Part 2 of the CoP on Design for Safety - External Maintenance 2021 (the “Code”), <i>“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”</i>.</p> <p>Please clarify whether something like collapsible railing or folding guard rail system can satisfy the above requirements. Example of product can be found in the market:</p> 	<p>members may provide further details including but not limited to (i) the hardship in complying with the relevant requirement under the Code; (ii) the operation and technical specification of the proposed guard rail system; (iii) overseas examples; and (iv) demonstration on compliance with the relevant requirements of Labour Department under Construction Sites (Safety) Regulations for BD’s further consideration and deliberation in the Technical Committee.</p>
16.	<p><u>Landscaped Features at Setback Area</u></p> <p>According to PNAP APP-132, , BD would consider applications for relaxation of site coverage under paragraph 3 on ‘Set Back Approach’, subject to certain conditions and <i>“on the ground of setting back a building for its full height from a site boundary abutting on a street”</i>. Sub-paragraph 3(d) further provides that <i>“the setback area is properly landscaped and/or paved and open, uncovered and without any permanent</i></p>	<p>BD advised that water feature which would contribute to improving street environment were acceptable to be provided at the setback area under PNAP APP-132.</p>

	<p><i>building structures other than the landscaped features and perforated boundary walls”.</i></p> <p>We considered that water features may be permitted in such set back area and is an acceptable landscaped features. Please confirm if our understanding is correct.</p> <p>(cross reference to paragraph 2 of Appendix D of PNAP APP-152 about water features which are listed as greening features in such set back area under SBD Guidelines.)</p> 	
17.	<p><u>Access for Inspections and Maintenance of External Drainage Pipe</u></p> <p>Referring to PNAP APP-93 for the maintenance of common pipe works within private areas, our understanding is that the delineation of common</p>	<p>BD advised that the access for inspections and maintenance of external drainage pipe enclosed by architectural features required under</p>

	<p>areas reserved for maintenance/repair of common drainage pipes located on a private flat roof, by means of different paving, or by stainless-steel strip delineation, and to be incorporated into the DMC, would be acceptable. Please confirm if our understanding is correct.</p> 	<p>paragraph 7 of the PNAP APP-93 should be connected from the common parts of the building and shown on the submitted drainage plans and incorporated in the corresponding building plans. The requirements were further elaborated in paragraph 2.6 and 2.7 of Annex 1 of Appendix B to PNAP APP-93 as follows:</p> <p>2.6 The lowest level of the concealed space should be accessible from the common parts of the building.</p> <p>2.7 Adequate working space (including the lowest level of the concealed space) should be designated as common parts of the building for carrying out maintenance works.</p> <p>In the sketch plan provided by AAP, the means of access from the common parts of the building to the delineated area through the private flat roof and the adequacy of working space for carrying out maintenance works should be fully demonstrated.</p>
18.	<p><u>Height of Balustrade for Balcony & Utility Platform (UP)</u></p> <p>Referring to item 16 of ADF 2/2020 held on 29 May 2020, please confirm if the following understanding is correct:</p>	<p>For (1), BD advised that AAP's understanding was correct. B(P)R 31(1)(a) referred.</p>

- (1) The rectangular horizontal plane (RHP) does not apply to a prescribed window facing a specified street.
- (2) Hence, the deemed-to-be level of window sill of the prescribed window opening onto a balcony facing a specified street will not be blocked by balcony, UP, AC platform and the like.
- (3) Prescribed window area for inclusion into natural lighting and ventilation calculation can carry down to floor level irrespective to the deemed-to-be level of window sill height.



For (2) and (3), BD advised that AAP's understanding was correct. The deemed level of sill as stipulated under B(P)R 31(3)(b) was for the purpose of assessing RHP mentioned in B(P)R 31(1)(b). For windows, no matter facing street which was not less than 4.5m wide or facing an RHP, the superficial area of that portion of the glazing and window opening at level below 1m A.F.F.L. might also be counted towards the aggregate glazing area and aggregate openable window area as required under B(P)R 30(2)(a)(i) and (ii) respectively. Item 2 of ADF 5/2017 held on 17 November 2017 and item 16 of ADF 2/2020 held on 29 May 2020 were also relevant.

19.	<p><u>Application for Consent to Commence Superstructure Works involving Bonus PR/SC for Dedication/Surrender of Land under B(P)R 22</u></p> <p>Further to item 1 of ADF 4/2019 held on 23 August 2019, BD acknowledged that it took time for the preparation and execution of the Deed of Dedication or Agreement to Surrender, for the approved GBP involving Bonus PR/SC. Therefore, BD has been adopting a pragmatic and flexible approach on a case merit basis to facilitate the AP in making application for consent to commencement of superstructure works in phases, by temporarily excluding those portions of the building works that are directly accountable for the bonus PR/SC.</p> <p>In this regard, we understand that the above reference to GBP covers to all types of superstructure works, including domestic, non-domestic and composite buildings. Please confirm if our understanding is correct.</p>	BD advised that AAP's understanding was correct.
	AOB Items	
20.	<p><u>Height of Glass Balustrade at Balconies</u> (Item raised by HKIS)</p> <p>A glass balustrade of 1250mm high from structural floor level is proposed so as to maintain the final balustrade height of 1150mm after installation of perforated wood deck of 100mm above the structural floor as finishes deck.</p> <p>From a recent case, BD insisted that the maximum height of the glass</p>	BD advised that glass balustrade of 1250 mm high at the balcony was acceptable in general.

	<p>balustrade should be 1150mm from structural floor level for ventilation reason. However, 1150mm height balustrade would render the installation of wood deck NOT possible.</p> <p>Would BD please clarify the requirement.</p>	
21.	<p><u>Design of Setback Area according to PNAP APP-132</u> (Item raised by HKIS)</p> <p>According to PNAP APP-132, it is allowed to design the setback area as a landscape area.</p> <p>A small area for water feature and water plant is designed in such setback area as part of the overall landscape concept. However, the water feature and water plant was rejected by the case officer in view of that water feature and water plant are not defined as landscape in the PNAP. As water feature and water plant are common landscape elements, we believe it shall be beneficial to the overall environment.</p> <p>We would like to seek clarification in this regard.</p>	<p>BD advised that the water feature which would contribute to improving street environment was acceptable to be provided at the setback area under PNAP APP-132.</p>



22.

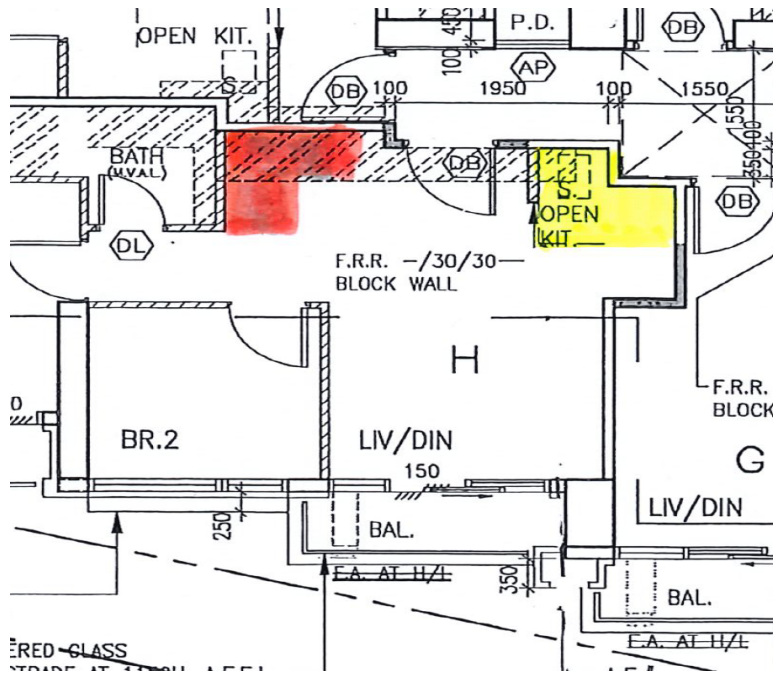
Location for Open Kitchen

(Item raised by HKIS)

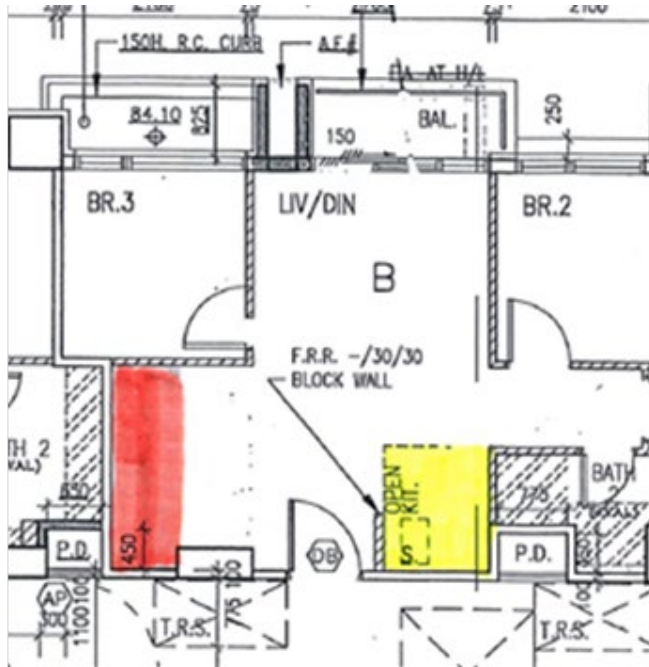
Please refer to the below sketches. BD insisted the open kitchen shall face to window and rejected the AP's original proposal even the window is within 9m to the open kitchen.

We would like to seek clarification on the requirement.

 ORIGINAL OPEN KITCHEN LOCATION
 REQUIRED OPEN KITCHEN LOCATION



BD advised that as per item 2 of ADF 3/2012 held on 18 May 2012, the open kitchen should be located in a position where most of the open kitchen area could face the concerned prescribed window(s) of the room for the required natural lighting and ventilation. To this end, the original locations of open kitchens in red colour as shown in HKIS's sketch were considered not acceptable.



<p>23. <u>Processing of Form BA14</u> (Item raised by HKIS)</p> <p>As advised by many members, many Forms BA14 are pending to be processed by BD particularly during the special work arrangement of New Building Divisions. We appreciate if BD can speed up the processing of Form BA14 once the office operation resume normal.</p>	<p>BD would review the situation and remind staff to promptly follow up the Form BA14.</p>
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