Summary of Items Discussed in 2/2023 APSEC Discussion Forum on 5 May 2023

	Items proposed by Convenors for Discussion	Summary of Discussion and BD's Response
	Items raised by HKIA	
1.	Sunken Slab at Single Family House and G/F of Apartment	
	Referring to item 4 of ADF 4/2020 held on 26 November 2020, we would like to confirm our understanding regarding the sunken slab arrangement of single family house and G/F of apartment as follows:- (i) Sunken slab arrangement is still acceptable at all levels of single family house and G/F of apartment to facilitate drainage repair and maintenance work. The design of sunken slab should comply with the requirements as stipulated in paragraph 5 of PNAP APP-93. (ii) For the sunken slab arrangement, regulation 54 of the Building (Standards of Sanitary Fitments, Plumbing, Drainage Works and Latrines) Regulations (B(SSFPDW&L)R) will not be applicable and hence it is not required to adopt cast iron pipes inside sunken slab at G/F. (Figure 1)	complying with the relevant requirements should be considered as an acceptable solution to satisfy the requirement set out in paragraph 3(d) of PNAP APP-93, which stated that "for domestic buildings other than those intended for single occupancy or single family residence, no pipeworks for a unit shall protrude into the unit under separate occupancy on the floor below". (ii) Regulation 54 of the B(SSFPDW&L)R regarding the design and construction of drains and sewers under buildings were considered different from the requirements stipulated in paragraphs 3(d) and 5 of PNAP APP-93 regarding the access to drainage pipes within a building for maintenance and repair. The UPVC pipes in Figure 1 were installed within a building instead of under a building, regulation 54 of the B(SSFPDW&L)R was therefore not applicable. For underground drains and sewers, their design and construction should comply with the said regulation.
		(iii) BD advised that HKIA's understanding was correct.

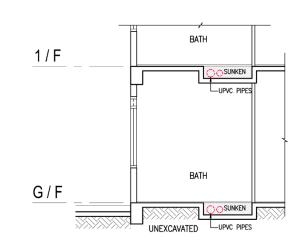


FIGURE 1

(iii) Regulation 54 of the B(SSFPDW&L)R is applicable to drainage pipes laying under the building, i.e. under the on-grade slab at G/F. (Figure 2)

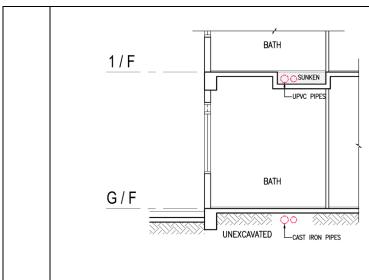


FIGURE 2

2. "Atrium" in Clause C10.3(a) of the Code of Practice for Fire Safety in Buildings 2011 (FS Code)

Clause C10.3(a) of the FS Code states that "the atrium should be separated from all other spaces by fire barriers having an FRR of not less than that of those spaces". We understand that this is intended to mean that "the atrium should be separated from other parts of the building by fire barriers ..." (i.e. areas outside the compartment which constitutes the atrium). Hence it is NOT intended to restrict uses within the atrium compartment, and uses such as retail shops, cafeteria, pop-up stores, kiosks, etc. are always permitted, provided they comply with the relevant clauses of the FS Code. Please advise if our understanding is correct.

BD advised that HKIA's understanding was correct.

3. <u>Location of Accessible Parking Spaces</u>

Paragraph 8(2) of the Design Manual: Barrier Free Access 2008 (2021 Edition) (DMBFA) states the required no. of accessible car parking spaces (based on total no. of car parking spaces in lot). Paragraph 9(1) of the DMBFA requires the accessible parking spaces to "be located in proximity and with an accessible route to the lobby with an accessible lift or entrance". For a project with **multi-storey carparks**, we understand that it is NOT required to have accessible parking space(s) on every floor, provided the above-mentioned requirements are complied with. Please advise if the above understanding is correct.

BD advised that HKIA's understanding was correct.

4. Curtain Wall outside Floor / Room without Accountable GFA

Curtain wall proposed for the building façade is normally designed to cover the whole of an external wall to achieve a continuous and coherent façade design. In many cases, certain part of the curtain wall will cover floors/rooms with floor area disregarded from GFA calculation, such as mechanical floors/plant rooms, car parks, refuge floors, transfer plates, etc., forming part of the same elevation. Hence, curtain wall proposed for the external wall of such floors/rooms should be permitted as an integral part of the floor/room which is/are GFA non-accountable. Please advise if this understanding is correct.

BD advised that the curtain wall could be disregarded from the calculations of GFA and site coverage (SC) if the requirements under PNAP APP-2 on curtain wall were fulfilled. Whether the floors/rooms enclosed by a certain part of curtain wall were accountable to GFA calculation or not was not a consideration under PNAP APP-2.

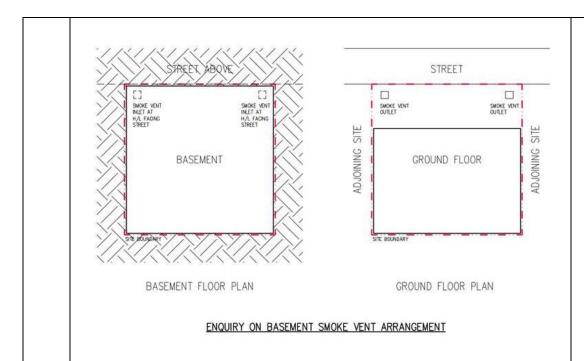
For floor/room which was non-accountable to GFA calculation with projection of the curtain wall system from the outer surface of the structural elements exceeded 200 mm for a domestic building or 250mm for a non-domestic building, BD will take a pragmatic approach to consider disregarding the entire projection of the curtain wall enclosing such floor/room from GFA and SC calculations on case basis.

5. **Basement Smoke Vent**

According to Clause C14.2(a) and (b) of the FS Code, smoke outlets should "be not more than 30 m apart and situated along the street frontages or adjacent to external walls", and "be sited at a high level, be evenly distributed around the perimeter of the building and be so arranged as to create a through draft".

The diagram below indicates a Class A site with only one side of the basement facing the street. Smoke outlets are located only on the side facing the street within the same compartment. Our understanding is that the smoke outlets design complies with the FS Code. Please advise if our understanding is correct.

BD advised that provided that the external discharge points of the smoke outlets were not more than 30 m apart, the proposal illustrated in the diagram could fulfil the requirements under Clause C14.2(a) and (b) of the FS code. Item 10 of ADF 2/2015 held on 20 March 2015 was relevant.



6. <u>Kitchen with Natural Lighting and Ventilation Not Relying on Window of Living / Dining Area and Complying with FS Code Clause C13.4</u>

It is our understanding that kitchen (open kitchen) with natural lighting and ventilation not relying on window(s) of living / dining area and at the same time complied with the requirements (a) to (e) as stipulated in Clause C13.4 of the FS Code, the fire barrier under Clause C13.3 shall not be required.

Would BD please confirm if the understanding is correct?

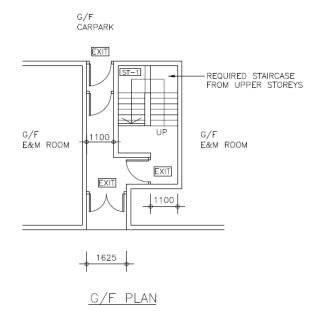
BD advised that as long as the open kitchen was provided with fire safety provisions in accordance with Clause C13.4 of the FS Code, the provision of fire barrier under Clause C13.3 of the FS Code would not be required.

7. Exit Route from a Ground Storey Forming Part of the Exit Route from Required Staircases – Clause B9.2 of the FS Code

Clause B9.2 of the FS Code stipulates that an exit route from a ground storey can form part of the exit route from a required staircase, provided that the sum of exit route can meet the requirements under the said Clause.

We would like to seek BD's clarification on whether the following scenarios are acceptable:

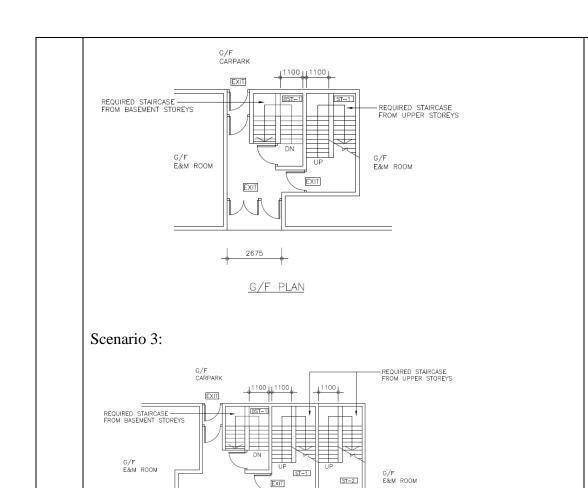
Scenario 1:



Scenario 2:

BD advised that Scenario 1 was considered acceptable under Clause B9.2 of the FS Code, provided that the width of the combined exit route including the clear width of the exit door measured between the vertical members of the door frame, was not less than the sum of half the width required for the exit route from the ground storey and the width required for the required staircase from the upper storeys.

BD also advised that under Clause B5.2 of the FS Code, every exit route should lead directly to an ultimate place of safety. As such, Scenarios 2 and 3 were considered unacceptable under the said Clause as more than one required staircase were arranged to discharge into a protected lobby instead of leading directly to an ultimate place of safety, which should be a street or open area outside the building under Section 3 of Part A of the FS Code. Besides, Clause B9.2 was only applicable to an exit route from a ground storey which also forms part of the exit route from a required staircase. It was not applicable to the merging of two or more required staircases before discharging into an ultimate place of safety.



EXIT

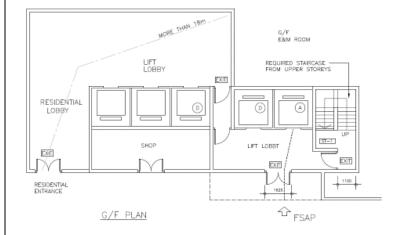
EXIT

G/F PLAN

8. Access to a Fireman's Lift at Ground Storey – Clause D7.3 of the FS Code

Clause D7.3(b) of the FS Code stipulates that the passage from the fire service access point to the fireman's lift should be separated from the remainder of the ground storey by walls having and FRR of not less than that required for the elements of construction in the ground storey. Any opening in these walls for communication with ground storey should be through a protected lobby. We would like to seek BD's clarification on whether the communication with ground floor can also form an exit route from the ground floor in the following scenarios:

Scenario 1:

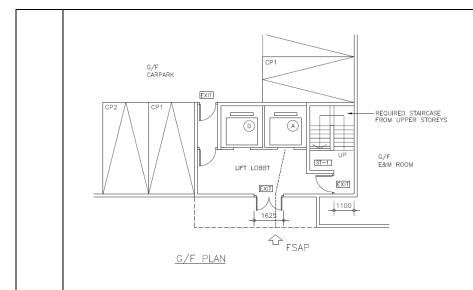


Scenario 2:

BD advised that under Clause D7.3(b) of the FS Code, the passage from the fire service access point to the fireman's lift should be separated from the remainder of the ground storey by walls having the requisite FRR. Opening in these walls might only be allowed for communication only with the ground storey.

Nevertheless, BD advised that Scenario 1 would be considered as the residential lift lobby was a public circulation space excluded from the calculation of occupant capacity and the opening was solely provided as a secondary exit for compliance with the travel distance requirements.

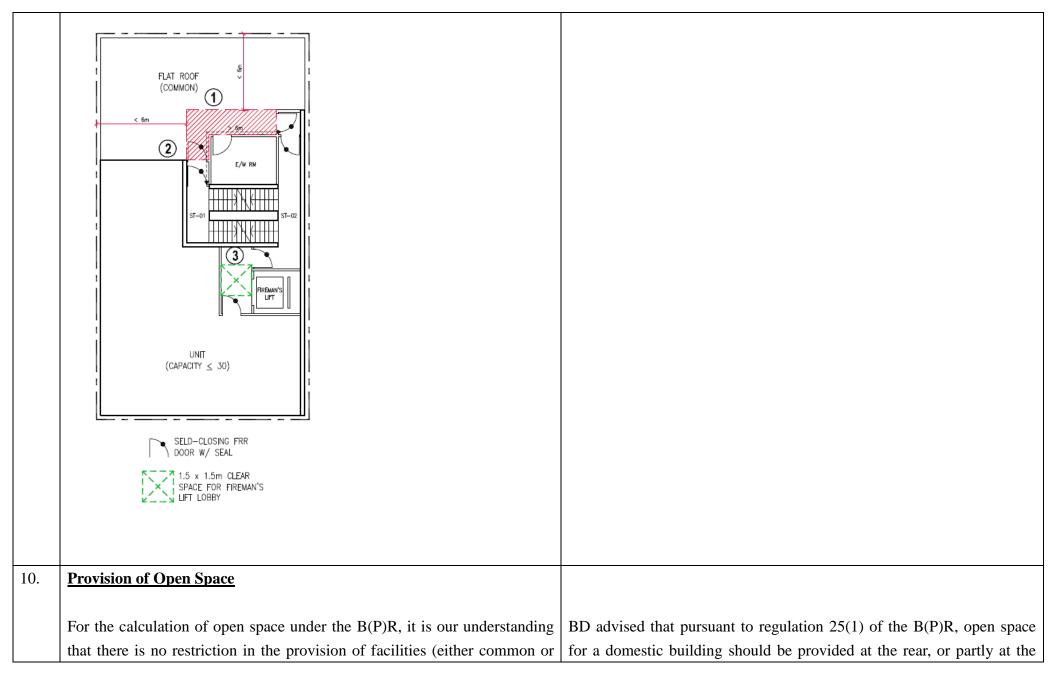
For Scenario 2, BD advised that it was considered not acceptable as the opening served as the exit of the carpark with occupant capacity instead of communication purpose only.



9. **Protection of Passage for Staircase Interchange**

For compliance with Clause B8.2 of the FS Code for staircase interchange, it is our understanding that the requirement under Clause C9.7 of FS Code for the external wall of a required staircase and its protected lobby does not apply to the interlink passage for staircase interchange. As illustrated in the sketch below, no fire rate protection should be required along the interlink passage hatched red. Please advise if our understanding is correct.

BD advised that HKIA's understanding was correct. However, it should be clarified in the sketch that access to two required staircases should be available for the subject unit for compliance with Clauses B8.1 and 10.3 of the FS Code.



private) within the calculated area, e.g. planter, swimming pool, Jacuzzi pool. Please confirm if our understanding is correct.

rear and partly at the side, at a level of not less than 150 mm below the floor of the lowermost storey. Besides, no part of the building which bounds on such open space at any level should be within 1.5 m, measured horizontally, of a line drawn vertically from a point in the boundary of the open space immediately opposite thereto.

In view that the facilities suggested by HKIA, viz. planters, pools, etc, were generally open in design and would not form part of a building, if such facilities were provided at a level not less than 150 mm below the floor of the lowermost domestic storey, they were generally acceptable.

Items raised by HKIE

11. Socketed Steel H-pile Works

For the Socketed Steel H-pile works at close proximity to sensitive structures, road and underground services, etc., BD normally imposes the condition under item 7 of section 17(1) of Buildings Ordinance requiring the submission of two sets of pile wall record plans, grout curtain record plans and report prior to consent application for the commencement and carrying out of Socketed Steel H-pile works.

To minimise the idling time of the construction site, it is suggested BD to consider allowing the commencement of Socketed Steel H-pile works upon RSE's submission of the pile wall record plans, grout curtain record plans and report to BD.

BD advised that the condition only required the submission of the said documents instead of the acknowledgement of the completion of works prior to consent application for the commencement of Socketed Steel H-pile works at close proximity to sensitive structures, road and underground services, etc. RSE might optimise the works programme to minimise site idling. Furthermore, RSE was encouraged to make use of ESH to speed up the consent application process.

12. **Minor Amendments for Deferring Submission**

For the stipulated criteria qualifying for modification of regulation 33(1) of the Building (Administration) Regulations for foundation, pile cap, ELS and site formation works as given in PNAP ADM-19, would BD please clarify if the following interpretation of "minor amendments" are correct.

Foundation Works

Minor amendments may include the following:

- (i) Providing additional piles (including relocation of piles to positions not more than 5 m from their original position). The addition of piles may also result from the addition of pile caps inside the cofferdam shown in the approved ELS plans;
- (ii) Revising the design socket length of piles according to the revised pile load and rockhead level after relocation of piles;
- (iii) Revising the reinforcement details of bored piles;
- (iv) Changing the orientation individual H-piles;
- (v) Revising the cut-off levels or founding levels of piles or founding levels of footings;
- (vi) Reducing the spacing of some piles after providing additional piles without affecting the minimum pile spacing requirement; and/or
- (vii) Footing foundation be taken as the same for large diameter bored pile with regard to the percentage increase in the number of foundation elements.

Pile Cap Works

Minor amendments may include the following:

BD reminded that amendments not listed in Appendix G to PNAP ADM-19 were qualified as minor amendments for deferring submission.

Foundation Works

BD advised that except item (vii), other items in the list were generally acceptable to be qualified as minor amendments. For item (vii), RSE were encouraged to discuss with BD officers before the submission on whether the extent of increase in the number of foundation elements would qualify for deferring submission.

Pile Cap Works

BD advised that the items in the list were generally acceptable to be

- (i) Revising the size and number of pile caps as long as they are within the cofferdam as shown in the approved ELS plan;
- (ii) Revising pile cap reinforcement details; and/or
- (iii) Revising the locations and the details of starter bars.

Excavation and Lateral Support Works

- (i) Adjusting the alignment of vertical earth retaining elements, including changes in their number and location, to suit the site condition without reduction of the design bending stiffness, structural capacity and water tightness;
- (ii) Changes in the pre-loading forces and the associated structural details of preloading bracket according to the adjustments made in the strutting arrangement;
- (iii) Changes to the arrangements in short struts without reduction of the stiffness of the affected area to resolve obstruction to the other structures;
- (iv) Relocation of king posts to position from their original locations as shown on the latest approved plans due to the adjustments of the strutting arrangement or to resolve obstruction to the permanent structures; and/or
- (v) Minor changes in the number, location and details of structural members without reduction of their design capacity and stiffness.

Site Formation Works

- (i) An increase or reduction in the height of cut or fill slope by not more than 1 m subject to paragraph 7(f) of Appendix G to PNAP ADM-19;
- (ii) Revising the geometry of permanent retaining wall to suit the increase

qualified as minor amendments. For item (iii), RSE were reminded to check whether such amendment would have implication on the framing layout of the superstructure (e.g. column locations), which might result in revisions for other types of plans.

Excavation and Lateral Support Works

BD advised that except items (ii) and (v), the items in the list were generally acceptable to be qualified as minor amendments. RSE were encouraged to discuss with BD officers before the submission on whether the proposed amendments to the excavation and lateral support works would qualify for deferring submission.

Site Formation Works

For items (i) and (ii) in the list, BD advised that RSE should refer to paragraphs 7(e) and 7(g) of Appendix G to PNAP ADM-19. For items (iii), (iv) and (v), consideration on whether the works were

	or reduction in retained height for more than 1m without change in	qualified as minor amendments the works would be on case basis.
	design principles;	
	(iii) Changes to the number as well as the horizontal and inclined	
	arrangement of soil nails or rock anchors that would not adversely affect the overall stability of the features or adjoining structures/	
	slopes/ utilities;	
	(iv) Revising the extent of site formation works (such as temporary	
	excavation, soil replacement works, surface protection measures, etc.)	
	to suit the site condition in order to avoid damage to the existing trees/	
	structures/ utilities; and/or	
	(v) Minor changes in the locations and invert levels of the proposed	
	surface drainage system to suit the site condition.	
13.	Implementation of Minor Works for Minor Structural Works in New	
13.	Development	
	<u> </u>	
	To streamline the approval procedures for better work efficiency and	BD advised that the legislative intent of the MWCS was to facilitate the
	productivity, we suggest BD to permit the implementation of the Minor	carrying out of minor works in existing buildings.
	Works Control System (MWCS) for minor structural elements in new	
	development, e.g. minor works items 1.8, 2.10 and 2.11 for the erection of	
	fence wall and its footing as well as the associated shoring and excavation	
	works.	would be explored.
	Items raised by HKIS	
14.	GFA Exemption for Hot Water Boiler Room	
	Further to item 1 of ADF 4/2020 held on 26 November 2020, it is noted that	BD advised that HKIS's understanding was correct. Boiler room for

BD would only allow the exemption from GFA calculation of the plant rooms described under paragraph 11 of PNAP APP-2, and Note (4) to Item 20 in Appendix A to PNAP APP-151, i.e. "hot water boiler room, filtration plant room for swimming pool in a hotel or for a water feature in a communal garden/landscape area...", which is extracted below:

Other non-mandatory feature or non-essential plant room, area of which may be exempted under regulation 23(3)(a) of the B(P)R, include hot water boiler room, filtration plant room for swimming pool in a hotel or for a water feature in a communal garden/landscape area, SMATV room, or similar plant room, and pipe and air ducts which are part of the distribution network for such feature or plant and contained within such room.

For non-domestic buildings, e.g. clubhouse building, we would like BD to clarify, provided that the pre-requisites and overall cap of GFA concessions of 10% under PNAP APP-151 are complied with, whether hot water boiler room under PNAP APP-151 of genuine size can be exempted from GFA calculation. Some case officers opine that the paragraph implies that hot water boiler room only applies to swimming pool in a hotel. However, it seems more reasonable that the paragraph limits GFA exemption of "filtration plant room" to that for either "swimming pool in a hotel" or "a water feature in a communal garden/landscape area". Otherwise, it may seem unusual that boiler room serving a water feature in a landscape area can be exempted from GFA calculation.

centralised hot water supply system in a hotel or clubhouse might be exempted from GFA calculation subject to the pre-requisites and overall cap under PNAP APP-151 and the limitations as stipulated in PNAP APP-40 and PNAP APP-104 for hotel development and residential recreational facilities respectively.

Provision of Hoarding for Sites with Special Site Conditions 15.

Referring to item 9 of ADF 5/2021 held on 12 November 2021, BD | BD advised that according to regulation 66(2) of the B(P)R, except for

clarified that provision of hoarding are always required for superstructure works.

The merit for the provision of hoarding are to provide physical separation from the public to the construction site. However, for some sites with special site conditions such as the subject superstructure works may be far away from other sites or public access, it seems that close board hoarding may be considered not necessary.

Example 1:

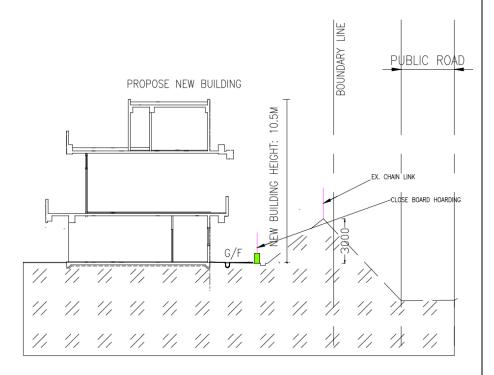


The proposed building was located on a sloping site and was around 13 m away from the other site. There were existing chain link fences around 5 m away from the site boundary for physical separation. Would BD clarify

isolated sites, all hoardings, unless exempted by the BA, should be close boarded. According to similar discussion under item 13 of ADF 4/2022 held on 12 August 2022, in view of different site situations which warrant different safety precautionary measures, proposal of non-provision of close boarded hoarding should be considered on case basis provided that the safety of the public would not be jeopardised.

whether the existing chain link fences are adequate to provide the separation and the hoarding along the site boundary at the slope can be omitted?

Example 2:



There is an uphill slope in front of the proposed building and it was around 3 m in height. Would BD clarify whether the existing chain link fences are adequate to provide the separation and the hoarding at the bottom of the uphill slope can be omitted?

Items raised by AAP

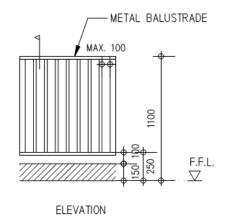
16. **Protective Barriers – PNAP APP-110**

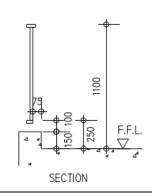
Paragraph 3 of PNAP APP-110 mentioned that "for railing type barrier on curb of less than 500 mm high, the top of the lowest horizontal rail³ should be not more than 250 mm above the adjoining floor level."

Footnote 3 of the said PNAP also mentioned that "if the railing type barrier just has vertical balustrades without the bottom rail, the curb should be not less than 250 mm high with protruding width less than 75 mm."

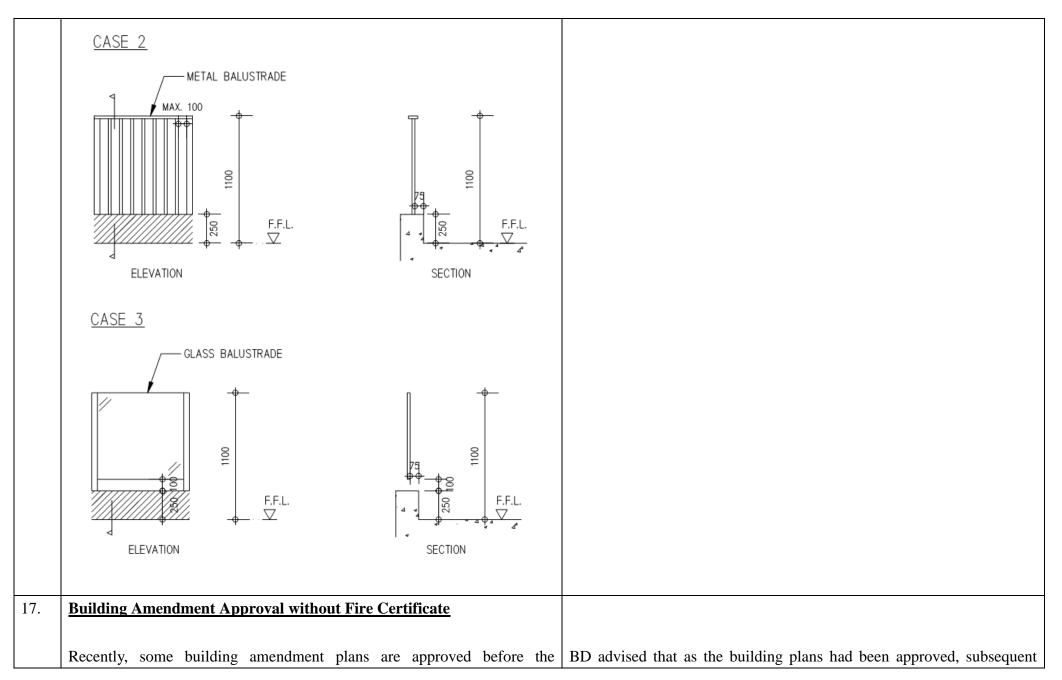
As such, the following railing designs comply with the requirements. Please confirm if our understanding is correct:-

CASE 1





BD advised that PNAP APP-110 was under review, and would provide response in due course.



	11 (11 1.1 1.1 1.70)	
	corresponding fire certificate is issued by FSD.	submissions involving minor amendments to the approved plans (other
		than major revision) should be regarded as amendment submissions
	In some cases that fire certificates cannot be issued and resubmission to FSD	instead of resubmission.
	is required, should the concerned submission be regarded as another	
	subsequent amendment submission or resubmission of the already approved	
	amendment?	
18.	<u>Utility Platform</u>	
	According to footnote 3 of Appendix A to JPN No. 2, the utility platform	BD advised that AAP's understanding was correct.
	may be provided with a water supply point and sink. We understand that a	
	washing machine may be placed at the utility platform. By the same token,	
	if we combined the utility platform with balcony according to the Code of	
	Practice on Access for External Maintenance 2021, the water supply point,	
	sink and washing machine would still be allowed to be placed on the utility	
	platform. Please confirm if our understanding is correct.	
	platform. Trouse commit if our understanding is correct.	
	Items raised by ACEHK	
19.	Circumstances in which a Supervision Plan is Not Required	
	According to paragraph 11 of the Technical Memorandum for Supervision	BD advised that building repairs works carried out under MWCS as
	Plans 2009, a site supervision plan is not required for building works that	Class I minor works would not require the submission of site
	satisfy certain criteria. The list of building works not requiring site	supervision plan. However, Prescribed Building Professionals and
	supervision plans includes all building repairs, all Class II minor works and	Prescribed Registered Contractors were reminded to observe the relevant
	all Class III minor works.	supervision requirements for works carried out under the MWCS.

	On the other hand, minor works item 1.17 covering repair of structural elements in accordance with the original design belongs to Class I minor works. For the avoidance of doubt, would BD clarify whether a site supervision plan is required for building repairs under minor works item 1.17.	
20.	New Building Works and Concurrent Minor Works within Same Site	
	We would like to enquire if there is any rule prohibiting minor works under the MWCS to be carried out concurrently with new building works requiring prior approval and consent at the same site/premises.	This item was similar to item 13 raised by HKIE above. BD advised that for works in existing buildings, the carrying out of alteration and addition works under approval and consent regime and minor works under MWCS concurrently on the same site had always been allowed.
	Items raised by AREC	
21.	Electronic Submission Hub (ESH)	
	Since the first launch of ESH on 30 June 2022, practicing engineers have widely adopted the ESH for submissions to BD. There are 2 commons concerns engineers have encountered for using the system:	For (i), BD advised that the maximum file size for uploading per batch was limited to 25 MB. Users of the ESH might contact the ESH hotline at telephone no. 3580 1000 for assistance when encountered difficulties in using ESH. BD would keep reviewing the system for
	(i) When a large number of drawings are to be uploaded (say 100 nos. of drawings), the system may have "no response" and the drawings are	improvement, if necessary.
	failed to be uploaded. Would BD recommend the maximum uploading	For (ii), BD advised that the allowance of selection of "type II
	size per batch (i.e. maximum number of drawings to be uploaded per	submission" after the submission in ESH would affect the processing of
	batch) for an effective uploading mechanism?	data for plan submission in the system, including the determination of

(ii) Some members found that when preparing an amendment submission, on the first page "basic information" there is a check box for applying for type II consent. Some members found that if they have failed to tick the check box for "type II submission" during preparation of submission, there is no option to re-tick the check box after the submission. Members are required to withdraw the submission and resubmit the same submission which require the submission process to start all over again. Would BD kindly review if the above could be enhanced.

submission date for counting the statutory processing period. Notwithstanding, BD would consider displaying pop-up notifications on the ESH to remind AP/RSE for ticking the relevant check box.

In response to AREC's suggestion, BD would consider including the project name and address instead of BD file reference only, in the acknowledgement of receipt of submissions generated automatically by the ESH for easy reference.

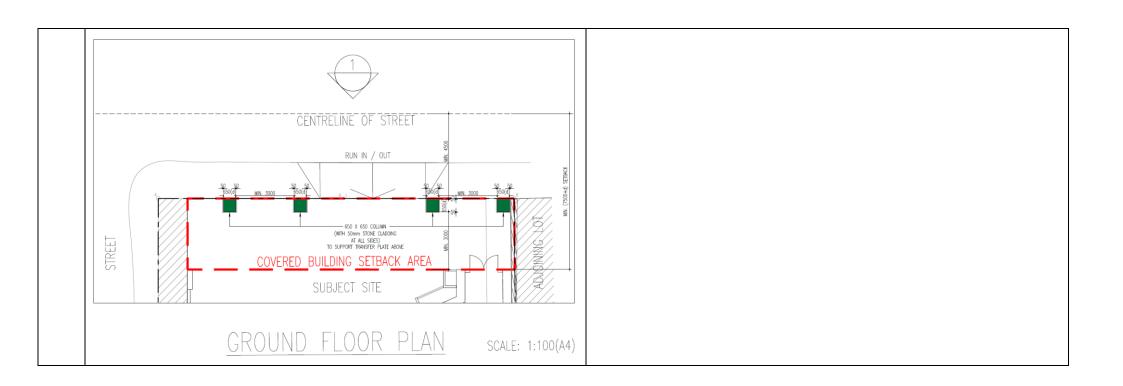
Items raised by PBSCA

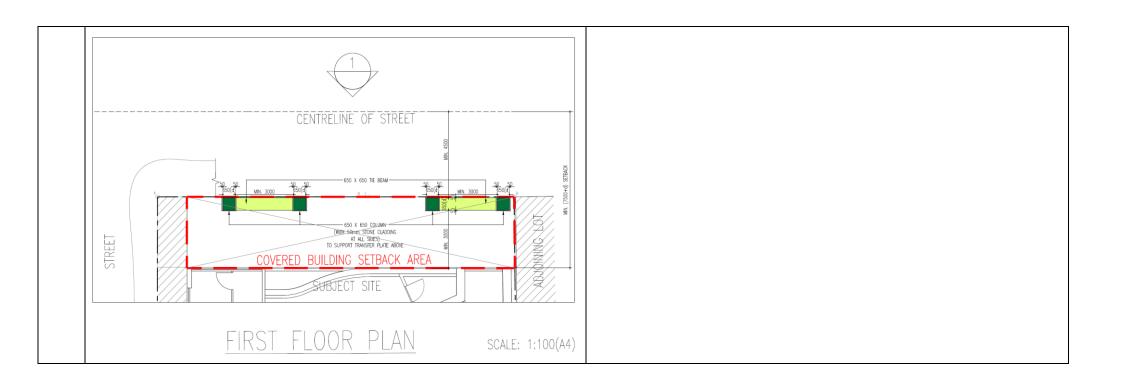
22. <u>Tie Beams within Building Setback Area under Sustainable Building</u> <u>Design Guidelines (SBD Guidelines)</u>

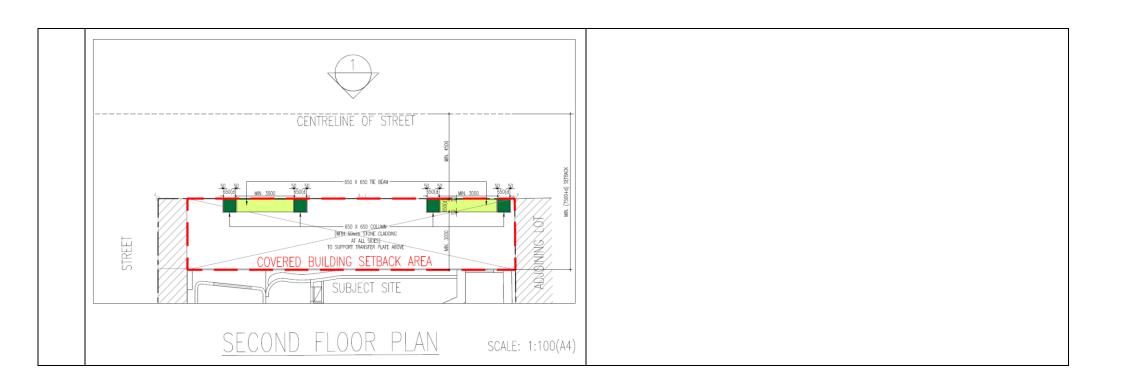
Pursuant to paragraph 7(a) of PNAP APP-152, the building setback requirement under SBD Guidelines can be achieved, provided that no part of building up to a level of 15 m above street level is within 7.5 m from the centreline of street. Paragraph 8(c) of PNAP APP-152 also specifies that columns supporting the building above may be permitted within the setback area subject to requirements in Figure C2 of Appendix C to the said PNAP.

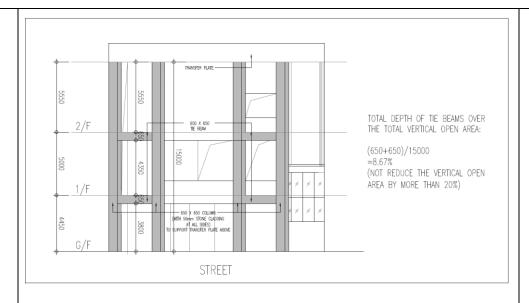
BD would pragmatically consider the merits of the case with the provision of tie beams, provided that the ventilation effectiveness would not be adversely affected. Depending on the circumstances of the case, BD might require further setback from the centreline of the street.

According to item 25 of ADF 5/2019 held on 22 November 2019, the dimensions for the setback and column separation should be measured from the finished surface.









ELEVATION 1

SCALE: 1:150(A4)

In the example illustrated above, there are columns in 650 mm x 650 mm (d) in structural dimensions, with additional 50 mm thick stone cladding at all sides of column within the setback area to support the residential tower higher than 15 m above street level. Due to site constraints and small site area, the size of the columns is already maximised under the building setback requirement in Figure C2 of Appendix C to PNAP APP-152. With 650 mm wide columns spanning over 15 m high of setback area, the slenderness ratio of the column would exceed 20 and additional tie beams of 650 mm x 650 mm (W x D) between columns at 2 levels are essential to prevent buckling of columns as advised by the RSE. However, PNAP APP-152 does not specify whether tie beams connecting the columns are permitted within the setback area.

Please advise if our understanding for the following issues are correct:

- (1) The principle of building setback is to maintain a ventilation corridor along the street profile. In accordance with the current practice and paragraph 7(b) of PNAP APP-27 on Gas Water Heaters, tie beams at the open end of a re-entrant not reducing the vertical open area by more than 20% is considered acceptable and not adversely affecting the ventilation requirement. Similar approach (i.e. not reduce the vertical open area by more than 20%) for tie beams can be adopted for the building setback requirement and be accepted as not adversely affecting the performance of ventilation corridor, provided that all the other requirements for building setback is complied with.
- (2) Claddings are only the facing or architectural decoration additional to the structural elements of a building according to section 26 of the Building (Construction) Regulation (B(C)R). Wall finishes, including cladding, shall not adversely affecting the performance of ventilation corridor for building setback. Hence, the wall finishes, including cladding, shall be disregarded in calculating the **largest planar dimension of column (d)** and the **minimum 3 m clearance between structures** required in Figure C2 of Appendix C to PNAP APP-152, provided that the overall thickness of wall finishes/ cladding is not more than 90 mm.

The abovementioned provisions in PNAP APP-152 and APP-27 as well as B(C)R are extracted below for reference.

	Extracted PNAP and B(C)R.pdf	
23.	Accessible Ramp at Initial Access of Site	
	An accessible ramp will be constructed at the initial access of a site connecting to an access road steeper than 1:12 (the requirement of accessible ramp stipulated in paragraph 17 of the DMBFA), and no vehicular drop off area is available along the access road. We would like to know whether our understanding below is correct: BD will consider this accessible ramp acceptable even persons with disability will face hardship to enter the site through the steeper ramp outside.	BD advised that the provision of an accessible ramp as the initial access of the site might be acceptable provided that the ramp complied with the requirements stipulated in Divisions 4 and 5 of the Third Schedule of the B(P)R. Divisions 4 and 5 of the DMBFA were also relevant.
2.1		
24.	GFA Calculation of External Staircase	
	To facilitate maintenance in the future, an external staircase (uncovered) to be constructed with reasonable size and attached to the external wall of a one storey building, will connect G/F (outside of the building) to R/F only, and the roof of the building is uncovered and is a maintenance roof (non-accountable to GFA calculation of the building). We consider that the external staircase can be disregarded from GFA calculation.	BD advised that according to item 8 of ADF 1/2021 held on 22 January 2021, an external staircase such as circular one without solid risers and enclosure wall(s) would not be required to be included in the GFA calculation. The whole covered area of an external staircase with solid risers or enclosure wall(s) should be included in GFA calculation unless the space below was filled with lightweight mass concrete.
	Please advise whether our understanding is correct.	

	AOB Item	
25.	Shortening of the 7-day Notification Period before the Commencement	
	of Building Works – Regulation 20(1) of the Building (Administration)	
	Regulations (B(A)R)	
	(Item raised by HKIE)	
	To facilitate a fast-track development programme, we suggest BD review	BD would consider the suggestion.
	regulation 20(1) of the B(A)R on whether the notification period of 7 days	
	in advance of the commencement of building works can be shortened, and	
	whether modification of the said regulation can be granted.	