

Summary of Items Discussed in 2/2024 APSEC Discussion Forum (ADF) on 3 May 2024

	Items proposed by Convenors for Discussion	Summary of Discussion and BD's Response
	Items raised by HKIA	
1.	<p><u>Provision of Telecommunications and Broadcasting (TBE) Room in Existing Shopping Arcade</u></p> <p>From our understanding, for alteration and addition (A&A) works submissions for the comprehensive renovation of an existing shopping arcade which has NO provision of TBE room in the original design, it is not required to provide the access facilities for the telecommunications and broadcasting services in accordance to the requirements laid down in PNAP APP-84. Please advise if our understanding is correct.</p>	<p>For existing buildings without the provision of TBE room in the original approved design, BD advised that unless the proposed A&A works would result in a new building where not less than one half measured by volume was rebuilt or the building was altered to such an extent as to necessitate the reconstruction of not less than one half of the superficial area of the main walls, the provision of the access facilities under regulation 28A of the Building (Planning) Regulations (B(P)R) would not be required.</p>
2.	<p><u>Provision of Smoke Outlets in Fire Compartment in Basement</u></p> <p>Clause C14.2 of the Code of Practice for Fire Safety in Buildings 2011 (June 2023 Edition) (FS Code) stipulates the requirements of smoke outlets for basement and that every compartment of a basement should be provided with smoke outlets. For large rooms in basement, it is common that the Fire Services Department (FSD) accepts the provision of gas flooding system for the exemption from the requirement to provide smoke extraction system. The room adopting gas flooding system will form a compartment on its own, and the smoke outlets therein are in conflict with the concept of gas flooding. Can smoke outlets not be provided under such scenario?</p>	<p>BD advised that the non-provision of smoke outlets at the basement area being served by gas flooding system would be favourably considered subject to the agreement by FSD.</p>

3.

Hoarding Permit Application involving Water-filled Barriers

Usually, when the building is close to lot boundary, the hoarding has to be demolished for the carrying out of external finishing works at the lower storeys of the building. It was our understanding that BD might favourably consider the adoption of water-filled barriers with sufficient height (say, 2.3 m in general) as precautionary measures / hoarding to safeguard the public from certain kinds of construction activities, such as street works, replacement of glazing panels for shops at ground level or minor A&A works at the external wall, etc. However, we have encountered recently that some case officers might still have concern and were reluctant to allow the adoption of water-filled barriers in hoarding plan submission / hoarding permit application. Since such barriers might need to be erected outside the lot boundary and hence encroaching onto public pavement, it is imperative to be shown on hoarding plan such that relevant departments (such as the Transport Department, Highways Department, etc.) could have the chance to review the hoarding alignment and ensure the design could meet relevant requirements without prejudicing public convenience. Otherwise, upon erection of the water-filled barriers (without being illustrated on the hoarding plan) on public pavement, relevant governments (including the Police) might raise queries or even reject such water barrier erection, causing hiccup to ongoing construction activities. This is particularly problematic if complaint from the public is subsequently received on the erection of such barriers. Would BD please consider allowing the provision of water-filled barrier as protective/precautionary measures to be illustrated on hoarding plan for formal acceptance?


BD advised that for building/street works not posing any risk of falling objects to the public/occupiers, water-filled barriers might be used as precautionary measures to isolate a construction site from the public/occupiers. However, such water-filled barriers could not perform the function of a hoarding/covered walkway required under the Buildings Ordinance (BO) as measures to protect the public/occupiers from falling objects arising from buildings under construction or demolition.

BD reminded that hoarding/covered walkway required under the BO for demolition and superstructure works should be structurally robust and not easily movable. According to paragraph 3.2.3 of the Code of Practice for Demolition of Buildings 2004, hoarding/covered walkway should be designed to sustain the wind load, and roof of the covered walkway should be designed to support a uniformly distributed load of 5 kPa. Such requirements were also applicable to the hoarding/covered walkway for superstructure works.

In general, BD would consider on case basis to allow water-filled barriers to be shown on the hoarding plans for information and circulation to the relevant Government departments for their comments, provided that:

- (a) the barriers were only used to isolate a construction site from the public/occupiers; and
- (b) details of the water-filled barriers (including their height, width,

		<p>thickness, weight, interlocking systems, etc.) and the remaining clear widths of the footpath, carriageway, etc. were clearly shown on the hoarding plans.</p>
<p>4.</p>	<p><u>Submission of Overall Thermal Transfer Value (OTTV) Report for Building without Provision of Air-conditioning</u></p> <p>For some development projects, there is no air-conditioning provided but BD is still requiring the submission of OTTV report.</p> <p>Can BD consider waiving the requirement of submission of such report upon the client submission of undertaking letter of non-provision of air-conditioning to the development?</p>	<p>BD advised that pursuant to section 3 and the Schedule of the Building (Energy Efficiency) Regulation (B(EE)R), buildings to which the B(EE)R applied included commercial buildings and hotels, irrespective of whether such buildings were equipped with air-conditioning system. OTTV Report including information and calculations of the OTTV as required by regulation 5 of the B(EE)R should be submitted in accordance with PNAP APP-67.</p>
<p>5.</p>	<p><u>Downloading of Electronic Copy of Approved Plans from Building Records Access and Viewing On-line (BRAVO)</u></p> <p>We understand that currently the purchase of electronic copy of approved plans in PDF format from BRAVO still involves the delivery of DVD-ROMs.</p> <p>Please see if BD can improve such process by allowing the downloading of the relevant files online upon payments.</p>	<p>BD advised that the same suggestion was raised in the Joint BSC and APSEC 4/22 Meeting held on 22 September 2022. The enhanced service of allowing direct downloading of electronic copy of building records would require legislative amendment which was being considered.</p>

Items raised by HKIE	
<p data-bbox="67 183 1164 231">6. <u>Composite Column Design</u></p> <p data-bbox="67 287 1164 518">According to Clause 10.5.3 of the Code of Practice for the Structural Use of Steel 2011 (2023 Edition) (Steel Code), application of “Simplified Method” is limited to members of doubly symmetrical and uniform cross section over column length. It is not applicable to structural steel component which consists of two or more unconnected sections.</p> <p data-bbox="67 574 1164 853">Would BD please clarify whether the “Simplified Method” provided in Clause 10.5.3 of the Steel Code is also applicable to design of a “doubly symmetrical composite column” when Clause 8.12 of the Steel Code is adopted to demonstrate the connectivity for the multiple inter-connected steel sections for their corresponding action effects whilst they are not typical cross sections as shown in Figure 10.17 of the Steel Code.</p> <p data-bbox="67 909 1164 949">Examples of the atypical cross sections are as follows:-</p> <div data-bbox="179 1029 414 1117" style="border: 1px solid black; padding: 5px; display: inline-block;">  </div> <p data-bbox="414 1101 1164 1141">N.B. :- Batten plates for connecting multiple sections</p>	<p data-bbox="1164 287 2141 470">BD advised that the simplified method of composite column design provided in the Steel Code did not cover the examples given, and the issue would be deliberated by the Technical Committee on the Code of Practice for the Structural Use of Steel.</p>



7. **Presentation of Structural Information in Submission of Superstructure Plan**

According to PNAP ADM-8, lateral wind load shall only be provided in Part I of the Structural Calculation. Meanwhile, design codes and standards, materials strength and standards, concrete cover and corrosion protections as well as fire resistance requirements etc. are to be given in structural plans for approval.

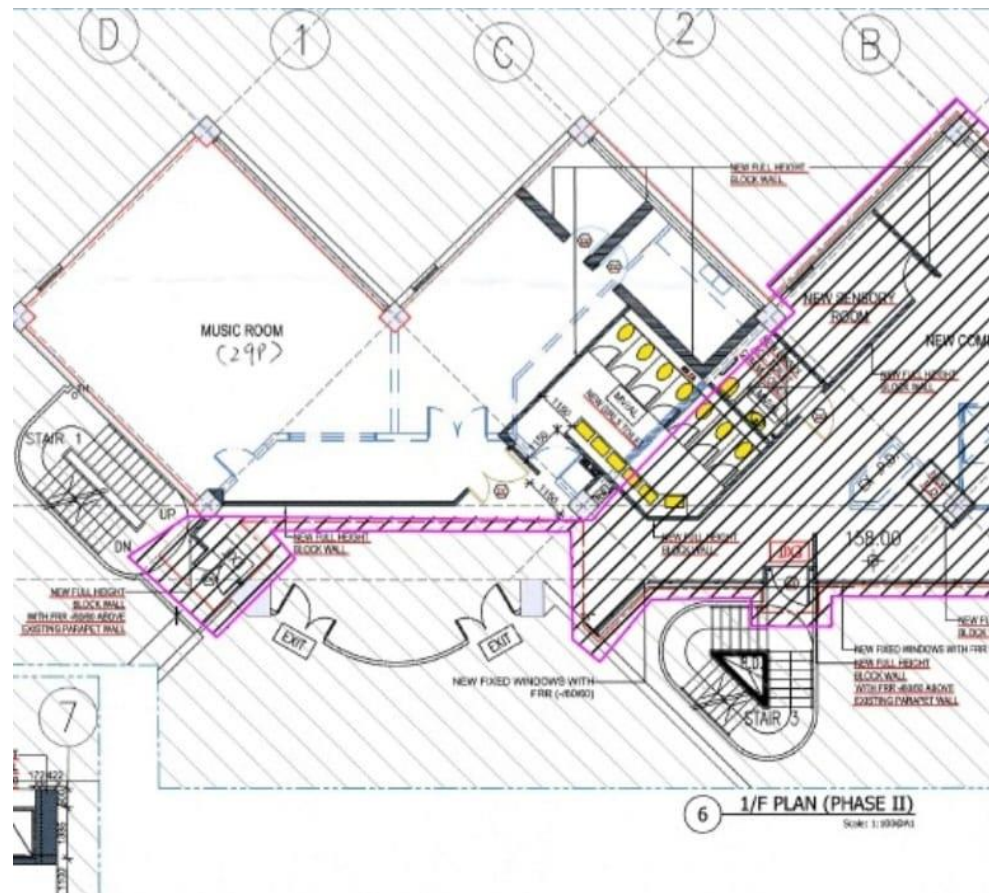
Please advise whether we need to show details of lateral wind loads, including force coefficient, directional factor, size and dynamic factor and wind load combination, and lateral wind loads with wind load combination extracted from wind tunnel test report, which are subjected to changes throughout the design and construction stages of the development, in the structural plans for approval.

BD advised that the details of lateral wind loads were essential information to be shown in structural plans for approval, and such practice had been in place since the promulgation of the Code of Practice on Wind Effects in Hong Kong 2019. Nevertheless, BD would consider reviewing the essential information of lateral wind load required to be shown in the structural plans for approval.

Items raised by AAP	
8.	<p><u>Barrier Free Access (BFA) Facilities for University Student Dormitories</u></p> <p>It has been accepted that student dormitories for tertiary institutions is not regarded as “Hotels, Hostels and Guesthouses” even though sometimes they are named as “hostels” as the occupants will stay for a long duration.</p> <p>With regard to the above, the provision of accessible guest room required under section 7 in Division 2 of the Third Schedule of the B(P)R and paragraph 7 in Division 2 of the Design Manual: Barrier Free Access 2008 (2021 Edition) (DMBFA) is not applicable. There were cases that BD officers required accessible guest room to be provided and that the bathroom and shower facilities serving these accessible guest rooms be integrated into the rooms as depicted in Figure 2 of the DMBFA. This poses operational constraint on the institutions as bathing facilities are often of shared use. Would BD please clarify?</p>
<p>BD advised that pursuant to section 7 in Division 2 of the Third Schedule of the B(P)R and paragraph 7 in Division 2 of the DMBFA, accessible guest rooms should be provided in every hotel, hostel or guesthouse. Hence, the provision of accessible guest rooms in student hostels for tertiary institutions was required.</p> <p>BD also reminded the owner/AP to observe the Disability Discrimination Ordinance (DDO) for the provision of accessible guest rooms in student dormitories.</p>	
9.	<p><u>Exit at Ground Storey</u></p> <p>Clause B9.2 of FS Code stipulates the minimum width of an exit route at ground storey where the exit route from a ground storey also forms part of the exit route from a required staircase. Would BD please clarify if the minimum width of exit door locates along the exit route at ground storey, if any, should follow the same token, i.e. the width of exit door should be not less than the sum of:</p> <ul style="list-style-type: none"> (a) half the width required for the exit door from the ground storey; (b) the width required for the exit door of the required staircase from the
<p>BD advised that HKIA’s understanding was incorrect. Clause B9.2(a) to (c) of FS Code refers to the width required for exit route from ground storey and the widths required for required staircases from upper storeys or basements, instead of the widths required for exit doors from such storeys. As discussed in item 7 of ADF 2/2023 held on 5 May 2023, the clear width of exit door measured between the vertical members of the door frame along the combined exit route at ground floor should not be less than the width of the combined exit route required under Clause</p>	

	<p>upper storeys; and</p> <p>(c) the width required for the exit door of the required staircase, if any, from the basements.</p>	B9.2 of FS Code.
Items raised by AREC		
10.	<p><u>Site Formation Plan involving Permanent Soldier Pile or Pipe Pile Wall</u></p> <p>To follow up with the discussion in item 15 of ADF 1/2024 held on 23 February 2024, please advise if a sacrificing thickness of 0.05 mm/year on steel section is acceptable for the design of permanent soldier and pipe piles.</p>	BD advised that their discussion with GEO was still in progress and the item would be advised separately.
Items raised by PBSCA		
11.	<p>Application for Gross Floor Area (GFA) Concessions in Existing Building as Surplus GFA for Future A&A or Extension Works</p> <p>For the plant rooms in an existing shopping arcade which have not been disregarded or exempted from GFA calculations in the original design, the property developer would like to apply for GFA concessions for the plant rooms without proposing any alterations to the plant rooms, so as to retain the surplus GFA for better planning of future A&A or extension works.</p> <p>According to item 5 of ADF 3/2019 held on 24 May 2019, in general, no surplus GFA should be resulted or left unused for any possible additions in future. This will result in hardship for the property developer to have better planning and flexibility for the future A&A and extension works. Would BA revisit this issue in a pragmatic way to allow surplus GFA for future extension works?</p>	BD advised that the plot ratio (PR)/GFA calculation shown on a building plan served the purpose to demonstrate that the actual PR/GFA did not exceed the permissible limits under the B(P)R or relevant Outline Zoning Plans. Any surplus PR/GFA shown on the calculation should not be regarded as unused PR/GFA guaranteed available for works in future submissions. GFA concession policy under the BO might be reviewed and changed from time to time, such that the PR/GFA of a building proposal in future submissions should be assessed in accordance with the prevailing policy at the time of the submission. Therefore, BD's response in item 5 of ADF 3/2019 was still valid.

AOB Items	
12.	<p><u>Completion of Exempted Building Works prior to the Grant of Consent to the Commencement of A&A Works</u> (Item raised by PBSCA)</p> <p>For an A&A works of an existing building involving the removal of some partition walls, which are exempted building works and shown as blue dotted lines in the diagram below, the BA requires the removal of these existing partition walls before granting the consent to the commencement of the A&A works, upon approval of the plans. We would like BD to clarify that the completion of such exempted building works shall not be a pre-requisite for granting consent to the commencement of A&A works.</p>
	<p>BD advised that unless the exempted building works obstructed the carrying out of the proposed A&A works and/or the proposed essential precautionary measures in occupied premises, generally such pre-requisite for granting consent to the commencement of A&A works would not be imposed. Nevertheless, PBSCA could provide details of the case for separate discussion.</p>



13. **General Comments and Suggestions on BD’s Plan Processing**

(Item raised by PBSCA)

Members of PBSCA have the following general comments and suggestions:

1. Improve communication channel with BD officers. It is difficult to contact them nowadays.
2. Some BD officers cannot provide precise comments until the last few days

BD advised that practitioners might contact BD officers by email with copy to their respective senior and/or chief officers for effective communication as officers might not be able to answer telephone calls due to other engagements at work.

	<p>of the statutory period of 60 days, and/or cannot provide comments at early stage (i.e. on the 45th day of submission of new building plans).</p> <p>The above problems may affect the timing of plan approval and fail to facilitate early approval of plans.</p>	<p>BD also advised that while BD would strive to provide feedback on whether the submission of new building plans was fundamentally acceptable on the 45th day of submission in accordance with PNAP ADM-2, the availability of other government departments' comments, as well as the accuracy and timeliness of AP's responses to address comments from BD and other government departments, might hinder the BD's provision of feedback.</p>
14.	<p><u>Last ADF of the Term</u> (Item raised by BD)</p> <p>BD advised that this would be the last meeting of this Forum in the current term which would end on 30 June 2024, and expressed gratitude for Convenors' contribution. The respective institutes/associations of the Convenors had been invited to nominate members to serve as Convenors of this Forum from 1 July 2024 to 30 June 2027.</p>	<p>Members noted.</p>