

15 January 2013

Mr Yu Tak Cheung
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12/F-18/F Pioneer Centre
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By Hand

Dear Mr Yu

**Suggested Enhancement on Administration of
Measures for Wholesale Conversion of Industrial Buildings
By The Hong Kong Institute of Surveyors**

Further to the AP/RSE discussion forum held on 4 January 2013, would like to offer our suggestions and comments on the administration of the revitalization measures to facilitate the better implementation of the captioned policy measures :-

1. Under the captioned revitalization measures, many industrial buildings are proposed to be converted to the buildings of other uses such as shopping centres, office, hotel, etc and the façade treatment has long been way to attract the public and upgrade the building value. However, the external façade of most of the old industrial buildings were built along the lot boundary for maximizing the plot ratio under the then building height limit. The external wall treatments of these existing industrial buildings were usually painted render in the past.

PNAP APP-150 has provided for exemption from section 31(1) of the Buildings Ordinance for the provision of curtain wall which projects over streets. Provision of cladding is, however, not mentioned in the captioned measures. As the Buildings Department is adopted a very stringent differentiation of curtain wall against cladding, it results in very limited choices of façade treatment to the buildings. We strongly suggest that provision of cladding system projecting over street similar to curtain wall shall be allowed subject to some prerequisite conditions.

2. Clause B8.2 of the Code of Practice for Fire Safety in Buildings 2011 specifies the staircases inter-change requirements for buildings with two or more required staircases. However, many existing industrial buildings are of strata-title and the ownership is usually divided on a floor by floor basis in that usually there is no provision of common corridor on each floor. In this situation, it is virtually impractical for individual owner to sacrifice their usable floor space in the middle of the floor to provide long internal common corridors or refuge floor to fulfil the abovementioned requirement. Most of our members conceive that this is a big obstacle for the owners to participate in the revitalization scheme of industrial buildings.



Date : 15 January 2013

3. In fact, our above suggestions are in line with the declared policy of the Development Bureau. Development Bureau's website has set-out the principles in dealing with the design of whole-sale conversion of industrial buildings in its "Frequently Asked Questions" section under the web-page of "Revitalizing Industrial Buildings". The FAQs 17 & 18 have clearly stated the policy intentions of taking a pragmatic approach in dealing with the aforementioned situations.

We trust the relevant government departments including Buildings Department should follow the same principles in processing the submissions. A copy of the relevant FAQs is enclosed for your easy reference.

We shall be pleased to discuss with you further in this matter should you find it useful.

Thank you for your kind attention.

Yours faithfully

Vincent Ho
Building Sub-committee Member
Representative of The Hong Kong Institute of Surveyors

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placing of utility structures on the main roof during departmental circulation of building plans.

Q17 Would the installation of curtain wall system in converted industrial buildings be regarded as increase in building bulk?

A17 The installation of curtain wall system in itself would not be regarded as an increase in building bulk for the purpose of considering applications for wholesale conversion under the revitalisation measures. The Government has also affirmed that, for the purpose of applying under the revitalisation measures, installation of claddings or curtain walls on the external walls of a wholly converted industrial building would not be regarded as increase in building bulk. This provision is applicable to all eligible applications for wholesale conversion submitted on or after 1 April 2012. There are standing practices for consideration of curtain wall installations and owners should follow the same in their submission of building plans for wholesale conversion. They should also refer to the land leases to see whether there are restrictions in this regard.

For those eligible applications for wholesale conversion submitted prior to 1 April 2012, the Lands Department will continue to exercise its discretion to consider allowing the installation of claddings or curtain walls during departmental circulation of building plans.

Q18 For wholesale conversion of an existing industrial building to a commercial building, if the original design of the building does not provide for access from one staircase to other staircases at each floor, can the roof be served as an interchange of staircases for the purpose of satisfying the requirements of the Means of Escape Code?

A18 According to the Code of Practice for the Provision of Means of Escape in case of Fire (the Code of Practice), for buildings that are required to provide two or more exit staircases, people using one staircase should be able to gain access to at least one of the other staircases at any time without having to pass through other person's private premises. Such access should be provided either at each floor or, where refuge floors are provided, at the refuge floor(s) and the roof.

For industrial building not exceeding 25 storeys in height above the lowest ground storey and without the provision of refuge floor to be wholly converted to a commercial building, if the original design of the building does not allow people using one staircase to gain access at any time to other staircases at each floor, the main roof of the building has to be designated as a refuge floor providing access for interchange to the other staircases.

For industrial building over 25 storeys in height above the lowest ground storey and without the provision of refuge floor to be wholly converted to a commercial building, if the original design of the building does not allow people using one staircase to gain access at any time to other staircases at each floor, the building has to follow the requirements in the Code of Practice to provide refuge floor(s) and access for interchange to the other staircases at both the refuge floor(s) and the roof.

Q19 Provided that the total GFA of the converted building does not exceed the permitted GFA, can the building owner re-arrange the use of GFA to suit the new uses for the converted building?

A19 The GFA of the existing building after conversion should not exceed the GFA permitted under the building plans last approved for the existing building by the Building Authority before the application.

In a wholesale conversion case, minor changes to the existing building frame, including variations to the internal and external structures, are allowed. It is possible to relocate some of the existing plants and pipe ducts and re-arrange the use of GFA, so long as there is no increase in building height and building bulk, and the total GFA of the converted building does not exceed the permitted GFA. Any demolition of external structures should involve no more than 10% of the total GFA of the existing building.

Owners should also ascertain whether there are other restrictions in the land lease with regard to building height, number of storeys, GFA, etc.

Q20 Under the "Hong Kong Planning Standards and Guidelines", the requirement for car parking spaces in office and commercial buildings is higher than that for industrial buildings. It would be difficult for some existing industrial buildings to meet these requirements through wholesale conversion. Would the Government exercise flexibility in considering wholesale conversion applications?

A20 Further to the discussions between the Development Bureau and the Transport Department (TD), TD has revisited the guideline on the provision of car parking spaces and loading/unloading facilities in industrial buildings applying for wholesale conversion based on its experience gained in processing applications received, so as to clarify its requirements for applications and considerations in exercising its discretion. For details, please refer to the page of "[Provision of Car Parking Spaces and Loading/Unloading Facilities in Wholly Converted Industrial Buildings](#)" of this website.