



June 2008

**Meeting of Subcommittee on
Building (Planning) (Amendment) Regulation 2008
on Friday, 6 June 2008
– Submission from the Equal Opportunities Commission –**

Introduction

The Equal Opportunities Commission (EOC) is invited to submit its view on the Building (Planning) (Amendment) Regulation 2008 (the “Amendment Regulation”) recently made by the Secretary for Development under section 38(1) of the Buildings Ordinance (Cap. 123) 123), which amends the Building (Planning) Regulations (Cap. 123 sub. leg. F) (“B(P)R”). This paper presents EOC’s views on the Amendment Regulation.

2. In general EOC supports the enhancements made in the Amendment Regulation. However, further enhancements in relation to safety and independent access presented in the following paragraphs are suggested.

Safety

3. In planning barrier-free access, safety concerns are always of paramount importance. Key enhancement to the current design requirement in relation to safety noted in the Amendment Regulation is the incorporation of more detailed requirements for audible and visual alarm and emergency call bell in accessible toilets (S76). While appreciating the introduction of this enhancement, the EOC is of the view that safety of persons with disability (PWD) can be further enhanced by adding

the following requirements in the Amendment Regulation:

- (i) **Audio and Visual Alarms.** At a minimum, fire alarm system with audio and visual signals should be provided in all accessible toilets and any other accessible common areas such as car-parks, lobbies and hallways to cater for the special needs of people with visual or hearing impairment.
- (ii) **Egress.** During emergencies, people with mobility impairment are left with fewer choices of egress due to their limitations. Thus, it is suggested that accessible routes serving any accessible part of a building **shall** also be designated to serve as a means of egress for emergencies, or at least connected to an accessible area of rescue assistance (e.g. a portion of a stairway landing within a smoke-proof enclosure).
- (iii) **Identification of Areas of Rescue Assistance.** For easy identification of areas of areas of rescue assistance by PWD during emergencies, it is suggested that each such area shall be identified by an appropriate sign and displays the international symbol of accessibility. The sign shall be illuminated when exit sign illumination is required.
- (iv) **Treads and Risers.** It is suggested that on any given flight of stairs (particularly those that are also a means of egress), all steps shall have uniform riser heights and uniform tread widths to minimize the risk of stumbling of people with visual impairment during emergency escape.

Independent Access

4. Existing design requirement for flushing controls in accessible water closet cubicles stipulates that a hand-operated flushing control “*shall be capable of being operated with one hand; not require tight grasping, pinching or twisting of the wrist; and be able to be operated with a force not greater than 22 N*”. This design requirement helps to ensure that PWD can effectively and independently use flushing controls in spite of their limitations.

5. The EOC is of the view that the same design requirement should also apply to door hardware (e.g. handles, pulls, latches, locks and other operating devices) on all doors installed in accessible parts of a building such as accessible guest rooms, car-parks, accessible route, etc, so as to ensure that people with poor manual dexterity have independent access to these areas.

Equal Opportunities Commission

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