



## **The Real Estate Developers Association of Hong Kong**

### **Comments on the Final Draft Design Manual: Barrier Free Access**

1. The current draft covers in great detail, with fully annotated diagrams and illustrations all the design elements catering the need of persons with a disability, the elderly, and people with other forms of physical infirmities or limitations. Noting that this is the first review since 1997, we would recommend that the Manual should be revised and updated more regularly to cope with the changing needs of the community and rapid development of new technology.
2. The exemptions listed in para. 2.2.2 (page 8) should also be reviewed from time to time as there are uses which at this moment may not have surfaced and attracted our attention.
3. While we support that where possible efforts should be made to allow disabled persons barrier free access, a balanced view must be maintained in the process of approving building plans (or exercising control under the Buildings Ordinance thereafter) for alterations or additions to existing buildings. In addition to the areas or parts of a building exempted from the application of the Manual as stipulated in para. 2.2.2, a flexible approach should be taken and exemptions be granted in cases where the physical conditions of the premises render the provision of barrier free access for the disabled not feasible because of design, usage or financial difficulties. Take for example the case of small shops fronting streets. The attached Photo A shows a shop of this nature at its occupation permit stage, i.e. the shop is provided with an access ramp for disabled, all in accordance with the requirements of the regulations or codes. Later this shop would be leased to a small business, and the shopfront will be decorated in a manner as shown in Photo B. Obviously the ramp has disappeared because there is no longer such a need for that type of business. To ask the shop owner or tenant to comply with the relevant requirements by returning the shop front to its original position would mean a call for the business to close, and this is completely contradictory to the spirit of providing a business-friendly environment as stated in the Chief Executive's Policy Address.
4. Lastly, the colour of the signage's background in Figure 29 of page 74 should be kept consistent with the International Symbol of Accessibility as mentioned in page 21 and page 73, where a colour close to dark navy blue is commonly used.



Photo A



Photo B