



6 June 2008

Hon Emily Lau,  
Chairman,  
Subcommittee on Building (Planning) (Amendment) Regulation 2008,  
Legislative Council, Legislative Council Building,  
8 Jackson Road, Central,  
Hong Kong

By fax: 2185 7845

Dear Ms. Lau,

### **Building (Planning) (Amendment) Regulation 2008**

I refer to your fax of 2 June 2008 and to the invitation extended to the MTR Corporation for submission of views regarding the proposed enhancement to the design requirements governing the provision of access facilities for people with disabilities (PwDs).

With an objective to provide barrier-free access for all passengers and to enable our passengers with special needs to be able to move around our system more easily, the Corporation generally supports the direction of the amendments, which strive to enhance the accessibility provisions for the PwDs.

The Corporation is of the view that the extent of application and limitations listed in Part 4 for different categories of buildings is considered to be too generalized, which may not be able to take into full account the unique operating environment of the railway system. The Corporation believes that a more specific approach should be adopted to address the needs of the disabled with facilities to be provided in accordance with the different functions of particular areas. For example, the non-public areas of MTR stations (i.e. station operating and control equipment rooms, and maintenance and workshop areas) should be excluded from the application of this Regulation to facilitate safe and reliable rail operations. It is therefore suggested an additional clause specifying the exemption for the aforesaid railway premises should be provided under the Regulation.

The Corporation's views regarding the individual requirements are enclosed in the Annex.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Ida Leung', written in a cursive style.

Ida Leung  
Senior Manager – External Affairs

Encl.

**Amendments to Building (Planning) (Amendment) Regulations 2008  
concerning disabled facilities**

Concerned item	Concerned sections	Comments
Raised traction strips	Para 19(2) & Para 23 of Part 2, Third Schedule	Taking into account that there are very few finishes that can meet the specified slip resistance, especially in wet conditions, it would be necessary to provide raised traction strips on ramps/dropped kerbs. It would be more appropriate to specify the raised strip not protruding above the general flooring surface by 2mm.
Contrasting colours for floor and wall/ tread and wall	Para 19(6), Para 25(3) & (4) of Part 2, Third Schedule	The requirement for the floor and wall, tread and wall, to be in contrasting colours is a debatable one and will impose unnecessary constraints in design. As no measurable value is specified, it is open to different interpretation and dispute. In reality, even if the colours of materials for floor and wall are the same, there will be some degree of visual contrast simply because of the different reflective values. At stairs and ramps, the provision of handrails would already help the partially sighted distinguish the floor and wall. Thus, this requirement appears too vague and does not serve any real purpose.
Defining external/ internal stairs	Para 25(1)(a) & (b) of Part 2, Third Schedule	There is ambiguity in defining external stairs and the usage of external stairs varies in different buildings. These requirements should be further elaborated for classification of internal/external stairs.

Concerned item	Concerned sections	Comments
Braille and tactile information signs	Para 26(4) and Para 30(2) of Part 2 & Figure No. 6 of Part 3, Third Schedule	We do not object to the provision of Braille and tactile information signs. However, it is more appropriate to have Braille and tactile information incorporated into the signs fixed to the handrail ends, instead of providing an additional set of signs on walls which may not be readily located by the visually impaired people.
Sign display	Para 66(2), (3) & (4) of Part 2, Third Schedule	These requirements need to be more specific on the minimum height of pictograms (or signage graphics and fonts displayed) which are critical in respect of legibility of signs (not the plain surface area of the sign plate).
Braille and tactile fire exit map	Para 68(4) & (5) Part 2, Third Schedule	This requirement should not be applicable to MTR environment and many other premises where the floor plans are large and complex. The visually impaired persons would require a lot of tactile indicators (in addition to Braille) on the exit map in order to understand the possible paths in different directions. This map would not be of great help to the visually impaired during emergencies when speedy evacuation is required. In practice, public address system and staff assistance/guidance will be more effective to meet the objective of this provision.

Concerned item	Concerned sections	Comments
Limitations	Part 4, Third Schedule	<p>We consider that the disabled facilities should be provided according to the functions of particular areas to effectively and economically meet the needs of the disabled. Therefore, we recommend that the following be incorporated after Para 2 (f) of Item 2 – Non-domestic buildings:</p> <p>“Operating and equipment control areas, and workshop and accommodations of similar nature in railway or other transport facilities that require trained and able-bodied personnel to perform operational tasks in respect of safety/ security of the said facilities.”</p>