

Test of Reasonableness Board (TORB)

As per the Equal Opportunities (Persons with Disability) Act I of 2000 Cap. 413 of the Laws of Malta

Our Ref: FebTORB_02

1st March 2019

Mr. David Caruana
L-Irdoss
Triq il-Ġnien tan-Nigra,
Baħrija, Rabat
Malta

PA/08416/18 – Rabat, Malta – Additions and alterations to existing property and change of use from Residential Unit (Class 1) to Guest house (Class 3A).

On Friday 22nd February 2019 the Test of Reasonableness Board (TORB) discussed a request for exemption received on the above indicated permit. Perit Hermann Bonnici, Mr. David Caruana and Ms. Mary Grace Caruana were present on behalf of the applicant.

Exemption was requested on the whole property considering it's size and layout and the constraints imposed by the Suprintendence for Cultural Heritage.

CRPD objected on the following non-conforming elements:

- Applicant is requested to provide and indicate the spot levels on both sides of main entrance leading in, where lines could refer to as a step.
- Maximum threshold 15mm
- The main entrance door leaf opening and it's clear width should also be indicated and conform to AADG2011
- Accessible route does not conform to AADG2011
- Reception counter/s should also conform to AADG2011
- No common accessible for all sanitary facilities has been provided at ground floor level
- Accessible sanitary facilities should be indicated using the international symbol of access
- All external paving material should be non-slip and clearly labeled on submitted plan drawings
- Some Internal door leaf openings do not conform to AADG2011
- Lift shaft as indicated does not conform to AADG2011

- Applicant is also requested to indicate the clear and internal lift cabin dimensions in accordance to AADG2011
- No refuge area has been provided in accordance to AADG2011
- No accessible for all units complete with roll in shower have been provided in accordance to "Tourism for all" / AADG2011. These should also be indicated using the international symbol of access
- Proposed basement level (Breakfast area) is not accessible for all

Taking all arguments in consideration, the TORB concluded that it is **REASONABLE** to exempt on the above due to the historical relation of the building and it's building constraints.



Rita Vella
Chairperson
Test of Reasonableness Board