

## Test of Reasonableness Board (TORB)

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

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5th June 2019

Ref: MayTORB\_03

Mr. Dirk Hili  
Allelon Ltd.  
33, Battery Street  
Valletta VLT1222

PA/02951/19 – Valletta – Proposed alterations to existing pre 1967 vacant building and change of use to hotel (Class 3B) including ancillary facilities. Application includes extension at roof level. Construction of pool and part demolition and re construction.

On Friday 31st May 2019 the Test of Reasonableness Board (TORB) discussed a request for exemption received on the above indicated permit. Perit Joseph Grech and Mr. Mark Muscat were present on behalf of the applicant.

Exemption was requested on two the corridor width leading to the rooms at the rear end of the building from 1st to 4th floor, and on the stepped access to the WC, wine display, lounge seating and bar/ restaurant at ground floor due to the limitations of the historic building.

CRPD objected on the following non-conforming elements:

- Clean copies should be provided for vetting (Arches lines should be removed or annotated since line/s could refer to a step/s)
- The INTERNAL/external floor levels should be indicated since line/s could refer to a step/s (All Internal/External Incl. Pavement, Yards, Terraces). Any threshold/s should not exceed the maximum permissible floor level as per AADG 2011
- The external paving materials should be indicated in conformity to AADG 2011 (Yards, Terraces, Roof etc.)
- All internal/external doors WIDTH should conform to AADG 2011 (Some are not). Double leaf doors should be in accordance (One leaf should be at least 900mm)
- The passenger lifts SHAFTS dimensions do not conform to AADG 2011 Moreover, the CABINS/ DOORS dimensions should be indicated in accordance to AADG 2011
- Some of the passenger lift landings do not conform to AADG 2011
- The swimming pools should be made accessible for all (Hoists in accordance to EU Standards)
- 'Accessible sanitary facilities' should be provided and marked on plan with its DOOR LEAF OPENING & DIMENSIONS as per AADG 2011 (All Floors)

- Accessible changing rooms & accessible showers should be provided as per AADG 2011 (Basement)
- Corridors width do not conform to AADG 2011 (Around Stairs/All Floors). Moreover, turning circles should be indicated in the change in direction
- Some of the lobbies dimensions do not conform to AADG 2011
- Sauna and steam room should be made accessible for all (Basement)
- The entrance door width do not conform to AADG 2011
- Reception & bar counters should be done as per AADG 2011 (Height, Extend etc.)
- Wall signs should be provided and installed on façade to indicate the accessible entrance (Elevation)
- Refuge areas should be provided (All Floors Incl. Basements & Roof) and separated as per AADG 2011
- The accessible guest rooms should be clearly indicated on plan. Moreover, the accessible sanitary facilities dimensions, fixtures/sanitaryware and furniture (Obstructing) do not conform to AADG 2011
- Restaurant/Bar, Lounge Seating, Wine display, Accessible sanitary facility are stepped thus they are not accessible for all (+0.51)
- Areas at the back are stepped thus they are not accessible for all (All floors leading to the guest rooms)
- Basement level is not accessible for all (Corridors Width)
- Roof level is not accessible for all (No Lift)

Taking all arguments in consideration, the TORB concluded that it is **REASONABLE** to exempt the two issues indicated by the applicants. All other points should be tackled and updated on plans as agreed during board.

*\*Exempted elements are ticked in an X above.*



Rita Vella  
 Chairperson  
 Test of Reasonableness Board