

Test of Reasonableness Board (TORB)

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

2nd August 2019

Our Ref: JulTORB_01

Archpriest Can. Rev. Vincent Borg
'Parish Office', 263
St. Paul's Street
Valletta VLT 1213

PA/10561/18 – Valletta – Internal and external alterations, which will involve the removal of two rooms found in the courtyard to install an access for all lift, the addition of bridges to link the floors, the division of some rooms, to reconstruct a collapsed room on the roof and to built an extension on the roof and the roofing over of the courtyard.

On Friday 26th July 2019 the Test of Reasonableness Board (TORB) discussed a request for exemption received on the above indicated permit. Perit Silviene Camilleri and Mr. Maurizio Lapira were present on behalf of the applicant.

Exemption was requested on the main entrance of the property, the Basement and the First Floor Levels as they cannot be made accessible due to the site limitations of the old property.

CRPD had objected on the following non-conforming elements:

- The architect is to clarify on the 'Service Area' at basement level
- Accessible entrance/s should be provided (Incl. 'Adoration Chapel') since the entrance thresholds exceed the maximum permissible floor level. Moreover, the INTERNAL/external floor levels should be indicated since line/s could refer to a step/s (Pavement, All Floors/ Internal Areas, Yard & Terraces). Any threshold/s should not exceed the maximum permissible floor level as per AADG2011.
- All entrances double leaf doors (Incl. 'Adoration Chapel' & 'Welcoming Room') LEAF OPENING DIMENSIONS do not conform to AADG 2011
- 'Iron gratings' should be in conformity to AADG 2011
- The passenger lift SHAFT/ CABIN/ DOOR dimensions do not conform to AADG 2011 (90 degrees). Moreover, the dimensions should be indicated in conformity to AADG 2011.
- External paving materials should be indicated in conformity to AADG 2011 (Yard, Terraces, Bridges etc.)
- Intermediate level (Catwalk) usage should be clearly indicated on plan
- Intermediate levels VOIDS should be indicated on plans
- First Floor Level, Intermediates & Terraces are not accessible for all
- Refuge areas should be provided (All Floors) and separated as per AADG 2011
- The accessible sanitary facilities DOORS LEAF OPENING % DIMENSIONS should be indicated as per AADG 2011 (Second Floor)
- Accessible sanitary facilities should be provided and marked on plan with it's DOOR LEAF OPENING & DIMENSIONS as per AADG2011 (First Floor & Recessed)
- The 'Accessible guest room' should be clearly indicated on plan

- Landing in front of the passenger lift do not conform to AADG 2011 (Clear Width/ Second Floor & Roof)
- All internal/ external doors WIDTH should conform to AADG 2011 (Some are not)

Taking all arguments in consideration, the TORB could not make a concrete decision due to lack of information. The applicant is requested to present proof that the step at entrance cannot be removed and the First Floor cannot be made accessible.



Rita Vella
Chairperson
Test of Reasonableness Board