

## 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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31st January 2020

Our Ref: JanTORB\_02

Mr. Alfred Manduca  
Valletta Palazzo Ltd.  
86, Fort Mansion  
Ta' Xbiex Seafront  
Ta' Xbiex XBX 1027

PA/06540/19 – Valletta – Proposed installation of retractable awning and alteration to existing window into a door on South Street. Change of use from Class 3B to Class 4C at ground, first, and second floor. Sanctioning of Spa area as built at basement -1.

On Friday 24th January the Test of Reasonableness Board (TORB) discussed a request for exemption received on the above indicated permit. Mr. Alfred Manduca, Dr. Edwin Mintoff and Perit Etienne Fenech were present on behalf of the applicant.

CRPD objected on the following non-conforming elements:

External Areas:

- External Paving Material for terraces at 2nd floor is not indicated as being non-slip.

Ramps:

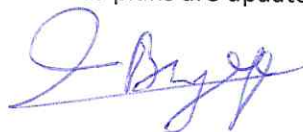
- Ramp at basement level is not AADG compliant; rise of 500mm needs a 1 in 20 ramp minimum; spa area is thus inaccessible.
- Ramp at 2nd floor not AADG compliant; rise of 450mm needs a ramp of 1 in 16 minimum; breakfast area is thus inaccessible.
- Ramp at 2nd floor has an incorrect level in its length of 22.80. This is higher than inside or outside.

Internal Environment:

- Corridor Widths are not marked for both corridors on the plans at 2nd floor level.
- Not all lobbies and circulation areas on 2nd floor show clear accommodation of a 1500mm diameter turning circle.

Exemption was requested on the ramps at basement -1 level leading to the pool and spa area and on the ramp at Second Floor Level to the external Breakfast/ Multipurpose Area as they hold gradients not conforming to AADG 2011. Applicants proposed the installation of a 'bell' adjacent to the ramp(s) to call for 24-hour assistance should a person having a disability find difficulty in accessing the ramp(s).

The TORB could not make a decision due to missing or incorrect information on plans. Exemption to be reconsidered once plans are updated.



Mr. Joseph Bugeja  
Vice-Chairperson  
Test of Reasonableness Board