

## 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\_04

Mr. Anthony Muscat  
Social Projects Management Ltd  
459 Bugeia Institute  
St. Joseph High Road  
Sta. Venera SVR SVR1012

PA/08232/19 – Valletta – Proposed alterations to accommodate four housing units.

On Friday 24th January 2020, the Test of Reasonableness Board (TORB) discussed a request for exemption received on the above indicated permit application. Mr. Charles Vella, Perit Jessica Sammut and Perit Stephen Buhagiar were present on behalf of the applicant.

Exemption from CRPD requirements was requested on the whole application in view of restrictions of the existing Grade 2 Scheduled Building and its surroundings. The main issue discussed was the lack of accessible main entrance at Ground Floor Level. Apart from this, the proposed 4 units at part Fourth Floor Level are all accessed through a stepped route.

CRPD objected on the following non-conforming elements:

- With reference to proposed development and fresh drawings provided, it is clear that accessible route at ground floor level contains a step and thus premises in question is not accessible for all. Architect is requested to indicate the accessible route on submitted plan drawings in accordance to the AADG2011.
- The main entrance door and its clear width dimensions including respective clear width dimensions should also be indicated and conform to the AADG2011.
- The clear and internal lift cabin dimensions should also be indicated and conform to the AADG2011.
- Spot levels on both sides of main entrances leading inside proposed units should also be provided where lines could refer to as a step.
- Maximum threshold 15mm.
- No accessible for all bathrooms have been provided.
- Accessible for all bathrooms and also accessible for all units should be clearly indicated on submitted plan drawings using the international symbol of access.

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Taking all arguments in consideration, the TORB concluded that it is **REASONABLE** to exempt\* from accessibility requirements in view of the historical limitations of the building and its surroundings.

*\*Exempted elements marked in 'X' above.*



Mr. Joseph Bugeja  
Vice-Chairperson  
Test of Reasonableness Board