

Test of Reasonableness Board (TORB)

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

6th November 2019

Our Ref: OctTORB_03

Mr. Gilbert Bugeja
c/o Bilom Group, 3,
Mro Frank Galea Street
Żebbuġ ŻBG 9060

PA/03903/19 – Marsascula – Change of use from old peoples home (class 2A) to guest house (Class 3A).

On Wednesday 30th October 2019 the Test of Reasonableness Board (TORB) discussed a request for exemption received on the above indicated permit. Perit Ruben Scortino and Mr. Gilbert Bugeja were present on behalf of applicant.

A temporary exemption was requested on accessibility requirements for the proposed use of guest house in view of the limitations of the existing building and also in view that the property is planned to be demolished and re-constructed to a Hotel in 3-5 years.

CRPD objected on the following non-conforming elements:

External Areas:

- External Paving Material for yards, terraces, balconies & roofs is not indicated on the drawings

Main Entrance:

- Internal and External Spot Levels for all entrances are not provided
- Width and Direction of Opening of Main Entrance Door has not been provided

Internal Environment:

- Lobbies or Circulation Areas should accommodate a 1.5m diameter turning circle

Sanitary Facilities:

- Accessible Sanitary Facilities are not marked with room dimensions and/or wheelchair logo
- Accessible Sanitary Facilities are not marked with door width and direction of opening

Lifts:

- The lift dimensions does not meet AADG requirements
- Lifts do not have 1.5x1.5m landings clearly marked on the plans

Tourist Projects:

- Accessible Guest Rooms complete with accessible bathrooms have not been provided
- The Number of Accessible Guest Rooms does not meet the AADG requirements

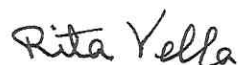
Reception Areas:

- Declaration which states that at least 1m length of the reception counter is not higher than 760mm has not been provided

Refuge Areas:

- Refuge Areas have not been provided

Taking all arguments in consideration, the Board will be able to consider temporary exemption request should the plans be amended to incorporate an accessible for all Ground Floor Level with an Accessible for All Guest Room. Applicants should therefore amend plans and re-apply for Board with updated proposal.



Rita Vella
Chairperson
Test of Reasonableness Board