

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_08

Mr. Michael Bugeja
Bilom Group
New Street in Mdina Road
Zebbug ZBG2870

PA/03242/17 – Mosta – Minor amendment: Correction of site dimensions following detailed survey, minor internal alterations, updating of sections and elevations based on existing site levels and redesign of elevations (no changes to accommodation schedule, site area etc).

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

Exemption was requested on:

- (a) Lift lobbies and landing dimensions as constructed slightly smaller than had been approved;
- (b) The two passenger lifts not conforming to AADG as they will not lead to the accessible apartments and;
- (c) The corridor which CRPD objected on since they are claiming that it is not a corridor but a space beneath the staircase with a low ceiling at one point (which allegedly does not hinder accessibility).

CRPD objected on the following non-conforming elements:

- Some of the landings dimensions in front of the passenger lifts do not conform to AADG 2011 (Should be 1.50m x 1.50m)
- Some of the lobbies dimensions do not conform to AADG 2011 (Near Garages 7, 12 & 28)
- Two of the passenger lifts are not accessible for all (Near Garage 4, 18, 23 & 38/ Due to the vehicular ramp)
- The corridor width do not conform to AADG 2011 (950mm near common stairs)
- Some of the spot levels and ramps do not correspond (Common areas & Maisonette 2)
- Bottom ramps landings should be provided in accordance to AADG 2011 (Common entrances)
- One of the ramp landings do not conform to AADG 2011 (+0.08/Should be 1.20x1.20). Moreover, the 1:16 ramp should be 1:20 (Near Maisonette 2)
- Apartment 3/6, Apartment 9 & Penthouse 2 sanitary facility dimensions do not conform to AADG 2011. Moreover, turning circles should be indicated in the change in direction (Bedrooms)

Taking all arguments in consideration, the TORB concluded that it is **REASONABLE** to exempt* the points raised by applicants. All other matters should be tackled and updated on plans.

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



Rita Vella
Chairperson
Test of Reasonableness Board