

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 June 2020

Our Ref: 20200529_TORB01

Mr. Damian Whitehead o.b.o Malta Industrial Parks Ltd
88, Valley Road
Birkirkara

MIP Site Kordin – Paola– Proposed installation of lift to an existing Class 5B General Industry Factory.

On Friday 29th May 2020, the Test of Reasonableness Board (TORB) discussed a request for exemption received on the above indicated application. Mr. Norman Clews, Perit Karen Vassallo was present on behalf of the applicant.

CRPD objected on the following non-conforming elements:

External Areas:

- External Paving Material is not indicated on the drawings
- Spot Levels for external areas are not indicated on the drawings
- Drop Kerbs are 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

Ramps:

- Ramps are not marked with Length, Width and Gradient
- Ramps are not marked with Spot Levels at the Beginning, Ending and on Landings
- Ramps are not provided with 1.5x1.5m landings at the Top and Bottom

Internal Environment:

- Spot Levels are not provided where lines on plan could refer to a difference in level
- Internal Door and Corridor Widths are not marked on the plans
- Lobbies or Circulation Areas do not accommodate a 1.5m diameter turning circle

Sanitary Facilities:

- Accessible Sanitary Facilities have not been provided

Lifts:

- The Dimensions of both an Accessible Lift Cabin and Lift Shaft are not marked on the plans
- Lifts do not have 1.5x1.5m landings clearly marked on the plans

Refuge Areas:

- Refuge Areas have not been provided

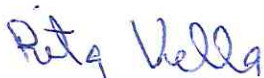
Exemptions were requested on the existing steps at the entrance of the factory and on the proposed steps to the passenger lift in view that a the proposed passenger lift cannot be implemented without a minimum 0.65m pit and

the ground floor slab cannot be modified in view of the underneath basement belonging to third parties.

During the Board Perit Vassallo however suggested the implementation of a platform lift at the entrance of the factory and a ramp not conforming to AADG 2011 to passenger lift. No plans or details were however provided.

The Board also pointed out that accessible sanitary facilities should be implemented although none were being proposed.

Taking all arguments in consideration, the TORB concluded that it is **NOT REASONABLE** to exempt. Updated plans as suggested during board should be submitted. The applicant is also requested to provide evidence that the passenger lift cannot be implemented without a minimum of 0.65m pit.

A handwritten signature in blue ink that reads "Rita Vella". The signature is written in a cursive, slightly slanted style.

Ms. Rita Vella
Chairperson
Test of Reasonableness Board