

## 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\_TORB02

Mr. Sandro Grech o.b.o SG Investments Ltd  
23 South House  
Hompesch Street  
Fgura FGR 2010

PA/07293/19 – Fgura – Sanctioning of offices as built from approved permit PA/1257/09, namely change in staircase and room configurations at first, second and third floors, minor changes to façade at 3rd floor.

On Friday 29th May 2020, the Test of Reasonableness Board (TORB) discussed a request for exemption received on the above indicated permit application. Ms. Natalie Grech, Mr. Sandro Grech and Perit Jesmond Mugliett were present on behalf of the applicant.

CRPD objected on the following non-conforming elements:

- With reference to proposed fresh drawings for the sanctioning of offices, Architect is advised that both lift shaft and also the clear and internal lift cabin dimensions do not conform to the AADG2011 since proposed lift has a doors located at 90 degrees relative to each other. (Refer to the AADG2011 point number 1.8.05 ii)
- Reception desk/ office desk counter/s (if any) height should conform to AADG 2011.
- No accessible for all sanitary facilities have been provided at first floor level. Accessible for all sanitary facilities should conform to the AADG2011 and be clearly indicated on plan drawings using the international symbol of access.
- With reference to accessible for all sanitary facilities provided at second floor level, Sanitary ware layout do not conform as per AADG2011 (see pg.55).
- Accessible route within entire premises does not conform to the AADG2011. Also at some instances corridor widths do not conform to the AADG2011.
- With reference to proposed third floor level, architect is requested to provide the proposed spot levels of hatched area marked as raised flooring. Maximum threshold between different areas must not exceed 15mm. All flooring needs to be non-slip and in accordance to the AADG2011.

Exemption requested on the existing passenger lift dimensions since the limited space at ground floor level does not permit a larger lift. Exemption also requested from the provision of accessible sanitary facilities at First Floor Level in view that an accessible sanitary facility is being proposed at Second Floor Level and all the floor levels will hold offices belonging to the same applicant.

Taking all arguments in consideration, the TORB concluded that it is **REASONABLE** to exempt\* the existing passenger lift from AADG 2011 requirements and from the provision of sanitary facilities at First Floor Level on condition that the sanitary facilities at Second Floor Level are accessible for all.

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

*Rita Vella*

Ms. Rita Vella  
Chairperson  
Test of Reasonableness Board