

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 July 2020

Our Ref: 20200626_TORB03

Mr. Clint Debono
84
Triq ir-Rinella c/w Triq is-Sienja
Kalkara

PA/01043/20 – Kalkara – To change a Class 1 residential unit to a Class 3A boutique hotel with 7 individual rooms. Excavation of basement level to create spa and gym and development of roof level to house one of the rooms, breakfast area and terrace.

On Friday 26th June 2020 the Test of Reasonableness Board (TORB) discussed a request for exemption received on the above permit application. Perit Karl Ebejer was present on behalf of the applicant.

CRPD objected on the following non-conforming elements:

External Areas:

- External Paving Material for roof is not indicated on the drawings
- Spot Levels for external areas 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; minimum 1 flap to be 90m

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
- Basement and roof common facilities inaccessible

Sanitary Facilities:

- Accessible Sanitary Facilities are not marked with door width and direction of opening

Lifts:

- Accessible Lifts have not been provided

Swimming Pools:

- Lifters or ramps to render the pool accessible to wheelchair users have not been provided

Exemption requested from the installation of a passenger lift since it would require the demolition of the existing staircase which is an original architectural feature within the building. Perit Ebejer said that there is also no space for a passenger lift structure to be fitted in between the staircase and that it would not be possible to build a smaller flight of stairs around the lift.

Taking all arguments in consideration, the TORB concluded that it is **NOT REASONABLE** to exempt particularly in view that the basement is not existing but will be excavated.



Ms. Rita Vella
Chairperson
Test of Reasonableness Board