

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_TORB07

Mr. Attilio Briffa
Tilio's Building
Triq in-Nawfragju c/w Triq San Pawl
Naxxar NXR 4016

PA/08765/19 – Naxxar – Extension to existing showroom at basement level -02 and construction of overlying third and fourth floor levels.

On Friday 26th June 2020 the Test of Reasonableness Board (TORB) discussed a request for exemption received on the above indicated permit application. Mr. Attilio Briffa and Perit Matthew Briffa were present on behalf of the applicant.

CRPD objected on the following non-conforming elements:

- The access route at ground floor level contains steppes and the common area leading to offices are not accessible to all as per AADG2011.
- All main entrance contains flights of step and it is not accessible to all as per AADG2011.
- Vertical platform lift should be indicated on plan with the opening doors.
- Spot levels on both sides of terraces and balconies should be provided where lines could refer as a step. Maximum threshold is 15mm.
- No accessible for all sanitary have been provided at each location in a building where toilet facilities are provided.
- The accessible for all sanitary facilities should be clearly labelled with the international logo of access and the opening door and direction.
- Tactile paving do not conform. External paving material should be marked non-slip as per AADG2011.

Exemption requested on the main entrance as it is existing and as approved in PA/00128/99. Steps could allegedly not be altered although no concrete reason as to why was provided apart from that they wish to keep the entrance as existing and as per original permit approval.

An alternate entry is proposed through the adjacent entrance for vehicles in conjunction with a reserved parking. Entry to showroom is through a platform lift. A passenger lift conforming to AADG 2011 is proposed to provide access to the offices at upper levels.

Taking all arguments in consideration, the TORB concluded that it is **NOT REASONABLE** to exempt.

Rita Vella

Ms. Rita Vella
Chairperson
Test of Reasonableness Board