

Test of Reasonableness Board (TORB)

As per the Equal Opportunities (Persons with Disability) Act I of 2000 Cap. 413 of the Laws of Malta

1st October 2020

Our Ref: 20200928_TORB02

Ms. Mariella Scerri
Orienta
Industrial Zone, Ta' Qali
Attard ATD 4000

PA/08713/19 – Rabat - Proposed change of use from existing Townhouse Class 1 to Guesthouse Class 3A. Proposed Internal alterations to existing property which consists of minor openings into the existing walls shifting of the existing stone staircase into a new location and extension onto the existing internal yard. Proposed washroom and pool at roof level. Proposed restoration of existing front and side elevations apertures including timber closed balconies.

On Monday 28th September 2020, the Test of Reasonableness Board (TORB) discussed a request for exemption received on the above indicated application. Ms. Mariella Scerri and Perit Joseph Bondin were present on behalf of the applicant.

CRPD objected on the following non-conforming elements:

- With reference to proposed development, Spot levels on both sides of main entrances leading in should be provided where lines could refer to as a step.
- Maximum threshold 15mm.
- The main entrance door leaf openings (for all entrance doors) and their respective clear widths should also be indicated on plan drawings and conform to the AADG2011.
- Reception counter/s (if any) should also conform to the AADG2011.
- The clear and internal lift cabin dimensions should also be indicated and conform to the AADG2011.
- Lift landings do not conform to the AADG2011.
- No accessible for all unit complete with accessible roll in shower has been provided as per the AADG2011 and Tourism for all.
- Spot levels on both inside and outside areas should also be provided where lines could also refer to as steps.
- All external paving material should be non-slip and clearly indicated on plan drawings and conform to AADG2011.

Exemption requested on the whole development in view that the building is an existing traditional townhouse at corner forming part of a row of houses situated within an area of archeological importance facing the land front ditch of Mdina.

Taking all arguments in consideration, the TORB concluded it is **NOT REASONABLE** to exempt the proposal as presented. The applicant should look into implementing a platform lift at one of the entrances of the building and provide further information including spot levels, the width of the alleyway to side entrance and present proof that the basement roof cannot be compromised.



Ms. Rita Vella
Chairperson
Test of Reasonableness Board