

## Test of Reasonableness Board (TORB)

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

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1st October 2020

Our Ref: 20200928\_TORB05

Ms. Maria Borg Myatt  
34  
Triq Brared  
Birkirkara BKR 1251

PA/04296/20 – Birkirkara – Alteration of the existing and change of use from residential to offices Class 4A.

On Monday 28th September 2020 the Test of Reasonableness Board (TORB) discussed a request for exemption received on the above indicated permit. Perit Maria Schembri Grima was present on behalf of the applicant.

CRPD objected on the following elements;

- Main Entrance should be marked and indicated on plan with spot levels on both sides as per AADG 2011 (one leaf of a minimum of 900mm).
- All internal spot levels should be marked on plan 'where a line could refer to as a step'.
- Maximum threshold of 15mm
- Reception desk height should conform to AADG 2011
- Lift shaft dimensions do not conform to AADG 2011 (Make reference to AADG 2011 page 38-41)
- Lift cabin dimensions should be marked and indicated on plan as per AADG 2011
- No accessible for all sanitary facilities have been provided (Accessible sanitary facilities should be marked and indicated on plan using the international logo of access as per AADG 2011 (door opening outwards)).

Exemption requested in view that the building is a pre-1967 building and for this reason it is not possible to have a ramp at the main entrance. Applicant would also like to retain the existing facade also in relation to the adjacent buildings.

Perit Schembri Grima advised that other than the main entrance, it should not be a problem to carry out the necessary modifications for access for all within the building.

Taking all arguments in consideration, the TORB concluded that it is **NOT REASONABLE** to exempt the provided proposal. The applicants should consider further solutions as advised during board including the provision of a vertical platform lift at the secondary entrance of the building (i.e through Office 1 on the proposed plan).



Ms. Rita Vella  
Chairperson  
Test of Reasonableness Board