

CIRCULAR PA 2/02

1 ACCESS FOR ALL - VETTING OF APPLICATIONS BY THE NATIONAL COMMISSION FOR PERSONS WITH DISABILITY

2 NEWLY APPROVED DOCUMENTS

INTRODUCTION

This Circular describes the application vetting procedure carried out by Kummissjoni Nazzjonali Persuni b'Dizabilita (KNPD) architects, and indicates the main items which are checked. It also makes reference to recently approved development plans.

1 ACCESS FOR ALL - VETTING OF APPLICATIONS: BY THE KNPD

1 Introduction

- 1.1 The Planning Authority has adopted the "*Access for All - Design Guidelines*" issued by the National Commission for Persons with Disability, replacing the planning guidance which had been adopted in 1994. The adoption of the new document relates only to those sections which relate to development control issues for which clearance from KNPD is required.
- 1.2 A basic requirement of the Equal Opportunities Act is that the service offered within a building is Accessible to All. So applications for development permission for certain specific building types, as stated in Circulars PA 3/99 and 4/01, are vetted by KNPD to ensure that the finished buildings will be truly accessible to the widest spectrum of persons including young mothers with pushchairs, the aged, the physically disabled and, of course, wheelchair users.
- 1.3 The most onerous requirements are those for wheelchair users. Indeed, it is fair to say that if a building is accessible to wheelchair users, then it is also accessible to the other groups of individuals.
- 1.4 When vetting applications, the KNPD therefore primarily takes into consideration wheelchair access.

2 Principles

- 2.1 The basic underlying principle is that a disabled user should be able to make use of the services offered within a building without the need for assistance. A more detailed discussion of this principle can be found in Sections 3 & 4 of the KNPD's "*Design Guidelines – Access for All*".
- 2.2 The KNPD architects carry out a very simple check that only covers the major areas of concern.

3 KNPD Vetting Procedure

- 3.1 The procedure followed during the vetting operation is for the KNPD architect to trace the route a user (or employee) would follow when making use of the services offered within the building. In general the areas checked are the following:

a) *Approach To The Building*

The architects would study the general approach including the arrangement and disposition of disabled car parking spaces and external ramps.

b) *Entrances To The Building*

Here the KNPD architects would check that the entry is a level one, that the clear door widths being proposed are adequate and that the lobby spaces available, both inside and outside of the main door, are not restricted.

c) *Circulation Within The Building*

Within the building itself, it is considered even more important for the user to get around in a completely independent manner. Thus, horizontal and vertical circulation routes are checked to ensure that all obstacles and barriers have been eliminated.

i) Horizontal Circulation:

Items related to horizontal circulation include widths of corridors, ramps and clear door sizes.

ii) Vertical Circulation:

Lifts, platform lifts and stairs lifts would be checked with respect to vertical circulation.

d) *Sanitary Facilities*

The final check would be that for adequate provision of sanitary facilities.

- 3.2 The checklist below indicates the various steps referred to above and provides reference to the relevant sections in *Design Guidelines – Access For All*.

CHECKLIST INDICATING THE PRINCIPAL ITEMS CHECKED BY THE KNPD ARCHITECTS WHEN VETTING APPLICATIONS FOR DEVELOPMENT PERMISSION

ITEM	ACCESS FOR ALL GUIDELINES (RELEVANT SECTIONS)
<p>APPROACH TO THE BUILDING Car parking provisions External Ramps</p> <p>ENTRANCES TO THE BUILDING Entrance doorways Entrance lobbies Thresholds</p> <p>CIRCULATION WITHIN THE BUILDING: Horizontal Circulation Internal Lobbies Internal doors Corridors</p> <p>VERTICAL CIRCULATION: Stairs Lifts</p> <p>SANITARY FACILITIES: Location and disposition within the building Layout</p> <p>REQUIREMENTS FOR SPECIFIC BUILDING TYPES: Specific requirements Specific requirements - Sanitary Accommodation</p>	<p>Section 5.3 subsections 1-6 Section 5.5 subsections 1-19</p> <p>Section 6.1 subsections 1-3 Section 6.2 subsections 1-4 Section 6.3 subsections 1-2</p> <p>Section 7.2 Section 7.3 Section 7.4</p> <p>Section 5.6 Section 7.5</p> <p>Section 7.6 subsections 1-12 Section 7.7 subsections 1-4</p> <p>Section 9 Section 7.7 subsections 14-16</p>

4 Details and Finishing

4.1 It should be noted that the KNPD's *Design Guidelines – Access For All* includes many details relating to finishing works. A typical example is the location of the control buttons to the lift. It would not be much use having the proper size of lift cabin and door openings if the controls were placed beyond the reach of a person in a wheelchair.

4.2 These details cannot be checked at the development application stage - however the inclusion of these details in any scheme is essential to ensure that a building is truly accessible.

4.3 *Architects and Developers are therefore urged to study the Design Guidelines – Access For All and to incorporate these details in their buildings. KNPD approval of the scheme at planning stage should not be considered a “hurdle” that must be overcome or an “end” in itself. Proper Accessibility can only be reached by a continued awareness throughout the finishing stages of a project.*

5 The Test of Reasonableness - where it may not be possible to make buildings fully accessible

5.1 Architects should note that the KNPD understands that there are instances where it is not possible to render buildings fully accessible. The Equal Opportunities Act also recognises this fact and allows for a “Test of Reasonableness”. When an architect feels that it is not possible, for some specific reason, to abide by the KNPD Guidelines, the Commission can be requested to exempt the particular project from the requirements. It should be noted that:

- a) Such exemptions cannot be granted by the vetting architects and so requests for exemption should be referred directly to the Commission.
- b) As a general rule, such exemptions are not intended for new development, but for applications to extend, modify or change existing buildings.

2 RECENTLY APPROVED POLICY DOCUMENTS

2.1 The Planning Authority Board and the Minister have recently approved two development briefs :

- a) Ta'Qali Crafts Village Development Brief (intended to rationalise development of the crafts village)
- b) Luqa Park Development Brief (providing new development opportunities for small scale industry, a trailer park and recreational facilities)

2.2 The following have been approved by the Planning Authority Board and await approval by the Minister before adoption

- a) the draft Grand Harbour Local Plan and the Kalkara re-planning exercise (approved following public consultation)
- b) Marsaxlokk Bay Local Plan (minor amendment at B'Bugia Ghar il-Friefet).

- c) Qawra Coast Development Brief (providing a planning framework for the development of tourism and recreational facilities including the construction of a marine aquarium)

2.3 All documents are available on the Authority's web site at :
<http://www.pa-malta.org>

Godwin Cassar
Director of Planning
24th January, 2002