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18 Jan 2024

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Dear Sir/Madam,

CONSOLIDATED QUESTIONS & ANSWERS FROM THE INTER-AGENCY COORDINATING COMMITTEE (IACC) SEMINAR 2023

We refer to the Inter-Agency Coordinating Committee (IACC) Seminar held on 07 Nov 2023 at BCA Academy. The seminar session provided a useful platform where IACC engaged Qualified Persons, Builders and Developers, to provide better understanding and clarity on the regulatory intent and objectives of the requirements set by the agencies.

2 Following the seminar, BCA has consolidated the queries and corresponding responses, which are appended herewith. The slides presented can be downloaded via the following QR code or URL link: <u>https://go.gov.sg/iacc-seminar-2023-materials</u>



3 For industry's information, please.

Yours faithfully





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Inter-Agency Coordinating Committee (IACC) Seminar 2023 7 November 2023

QUESTIONS & ANSWERS

Inter	Inter-Agencies		
S/N	QUESTIONS	ANSWERS	
1	Could it be possible for IACC to consolidate all the requirements into a single platform instead of having the data and information spread across different disciplines?	The CORENET e-info platform serves as a central repository for building codes, regulations, and circulars issued by the different construction related regulatory agencies. It also regularly shares circulars and upcoming events with its subscribers.	
		CORENET e-Info Homepage: <u>https://www.corenet.gov.sg/general/E-Info.aspx</u> CORENET e-info Subscription: <u>https://www.corenet.gov.sg/general/Subscribe.aspx</u>	
2	It was presented that the height of the development should be designed with consideration of construction processes. Does it mean that buildings in future should be designed to be lower than the maximum height limit?	Yes, the building must be designed to adhere to the requirements specified by the Civil Aviation Authority of Singapore (CAAS) and Republic of Singapore Air Force (RSAF), and not exceed the height limits. Apart from the design of the height of the building, project parties should also take into consideration the height of equipment on the roof, such as the chimneys above the building.	
		Project parties may reach out to CAAS and RSAF to clarify lifting equipment height control requirements for site-specific locations. CAAS Email: <u>caas ansp ols@caas.gov.sg</u> RSAF Email: <u>height control@defence.gov.sg</u>	
3	Could the IACC assist in addressing conflicts that often arise between LTA, PUB, NParks, and NEA regarding the maintenance responsibilities within the same road reserve?	The maintenance scopes between the agencies are quite well defined. If there are any inter-agency conflicting requirements, they can be escalated for resolution in IACC.	



4	Suppose the resolution of a set of conflicting requirements is to submit a waiver to one agency. Would the developer be expected to pay waiver fee for this?	The IACC conflict resolution platform is not a waiver platform. Instead, it is a platform for agencies to come together to find solutions to address a problem. If the issue pertains to a deviation from the requirements of the respective agencies', waiver fees of the corresponding agencies will apply.
5	Will IACC intervene in advance for conflicts among Agencies in CORENET X submission before the issuance of WD?	Under the CORENET X process, project teams collaborate upfront to de-conflict their designs and submit one coordinated model to agencies in openBIM format. All agencies review the submission collectively at the same time and provide one coordinated response to the project team. This fundamental redesign of the submission process enables cross-agency issues and conflict to be identified and resolved upfront. Where there are project level interagency regulatory conflicts, with CORENET X, these can be surfaced early and brought to IACC for resolution where needed.
6	Is it possible for agencies to review and moderate building codes, considering the trend towards greater stringency that makes design highly prohibitive? The responsibilities of QPs are also always increasing.	Regulatory requirements are regularly reviewed to ensure that rules are up to date and in line with building design and construction trends. Specific suggestions can be raised to respective agencies for consideration.
7	Would authorities consider providing authority pre- consultation using 2D drawing format even when CORENET X is in function?	Yes, Qualified Persons (QP) are encouraged to pre-consult with the relevant agencies using 2D or 3D drawings, especially during the preliminary stage of the project.
8	Is it possible for agencies to handle the design and implementation of external works through a term contractor, charging a plan fee or similar? This would alleviate the burden on QPs who often struggle to comply with conflicting requirements.	Agencies' term contractors are engaged for specific areas under their purview. The industry might be monopolised by the term contractor(s), depriving other/smaller contractors of the environment to build up their profile and professionalism.
9	Is SLA also part of IACC? There are some issues that are related to land.	Although SLA is not part of IACC, IACC could still reach out to the agencies outside of IACC to facilitate the resolution of relevant issues.



10	Can developer lodge an IACC case instead of QP?	Yes, but the QP must provide regular updates on the case to IACC and be present for all IACC Resolution Meetings.
11	Is it possible for IMDA, PUB, and SP to furnish their guidelines for the requirements of laying and diverting services along the road?	PUB's Code of Practice and standard drawings for drainage, sewerage and water supply works can be obtained via <u>PUB Code of</u> <u>Practice/Guidelines</u> . In addition, detailed requirements for water pipe diversion works are provided as well when processing such requests.
		The URL link provided below contains the relevant requirements, which include Earthworks Requirements, the Do's and Don'ts when conducting any road works, and the requirements imposed on the party during cable diversion. IMDA has previously conducted a few rounds of briefing to the industry with regard to these requirements.
		https://www.earthworks.sg/notification/dist/doc/downloa d/VQ%20Earthworks%20Requirements_V3.pdf
12	How can we acquire additional permanent space or land if each agency insists on compliance with their minimum space requirements or the improvement of existing structures outside of the project boundary?	Agencies are cognisant of challenges encountered by QPs when designing and implementing external works, especially in built-up areas. QPs are encouraged to pre-consult agencies to discuss innovative solutions to achieve win-win outcomes.



BCA	BCA		
S/N	QUESTIONS	ANSWERS	
1	When will Lightning Protection System (LPS) Plan submission be implemented?	The legislation for Lightning Protection System (LPS) Plan submission has yet to be passed. We will inform industry via a circular 6 months ahead of the implementation date when it is finalised.	
2	There are many QP/PE endorsements required during TOP documentation submission (E.g., STs) that are of similar nature. Could BCA consider streamlining some of these documentation requirements to facilitate easier submission?	Generally, at TOP stage, the various approval/clearance by agencies are required as certification of completion and compliance of the necessary works with Authorities' requirements. This also include certifications by QPs for completion and compliance of certain works. We would need more specific details to address this suggestion. Please reach out to us at <u>BCA_IACC_Secretariat@bca.gov.sg</u> to provide more information on the query.	

NPA	NPARKS		
S/N	QUESTIONS	ANSWERS	
1	Is it possible to relocate the existing bus stop to the green buffer area fronting the public road?	Green buffers are requisite planting areas meant for tree planting to provide shade and greenery for the development. Bus stops are commuter facilities within the road reserve, which should not impede greenery provisions within premises. Qualified Persons are encouraged to pre-consult NParks and LTA for such proposals.	



URA	JRA		
S/N	QUESTIONS	ANSWERS	
1	Would URA be open to exempt GFA for substations located at the ground floor, so that developers and QPs can better address PUB's concerns regarding flooding?	Such substations, like any other covered floor area, is to be computed as GFA. Developers/QPs should plan and cater for such spaces accordingly in their designs, taking into account other technical agencies' requirements.	
2	Are condominium unit owners allowed to construct roof shelters on balconies and install blinds (E.g. Zip track) to fully enclose the area, citing reasons such as preventing killer litter?	If the balcony has already been approved and previously computed as GFA, URA can consider proposals to roof over such balconies. The installation of fittings such as blinds, do not require URA's approval.	

SCD	SCDF		
S/N	QUESTIONS	ANSWERS	
1	If we choose to refurbish an existing old building (A&A works) with a non-compliant staircase in terms of width, tread, and riser, would SCDF require us to demolish and reconstruct the staircase?	SCDF will assess the building on a case-by-case basis. The QP may engage in pre-consultation with SCDF regarding additional measures to improve the fire safety of the building.	
2	When carrying out A&A works on older buildings, is it necessary to implement all critical fire safety measures? What should be done if compliance with any of the current measures is not feasible?	SCDF has identified approximately 500 older buildings that need to adhere to the latest fire safety measures. While there are no intended fire safety works to be carried out, the owners of these buildings will need to install mandatory minimal critical fire safety upgrades to safeguard public safety. These buildings, constructed before 1991 for commercial & industrial and before 2002 for healthcare, have a higher occupancy load and cater to occupant profiles such as patients and homes for seniors. On the other hand, if these building owners wishes to carry out A&A, they will need to comply fully with the prevailing Fire Code requirements with reference to SCDF's Circular "EXTENT OF RESPONSIBILITY OF QUALIFIED PERSONS IN A&A WORKS".	



3	It may be challenging for many cases to fully comply with the new fire code. If landlords have met at least 80% of the fire code requirements, how can we address situations where it is truly impossible to meet 100% compliance with the new code?	SCDF will assess the building on a case-by-case basis. The QP may engage in pre-consultation with SCDF regarding the issues they faced.
4	Why are digital locks not allowed for fire door? Owners may change to digital locks on their own. How do SCDF regulate this?	On 25 th August 2023, SCDF issued a circular regarding the Publication of the Code of Practice for Fire Precautions in Building 2023 Edition. This edition incorporates the requirement for digital locks, as outlined in Annex E, available for download from CORENET.
5	Can we request for more fire code seminars focused on understanding key considerations in fire planning and provision, so that waiver submission can be more effective?	SCDF will continue to collaborate with our stakeholders e.g., SIA, IES, ACES, IFE, JTC, HDB, etc. to conduct regular fire safety seminars platform for our industry players. Topics will include amendments to the Fire Code, changes to FSA/Regs, common audit findings, etc. For schedules and details of these seminars, please refer to respective partner websites.

PUB	PUB		
S/N	QUESTIONS	ANSWERS	
1	Can PUB make the modelled flood level more accessible?	As the modelled flood level is generated on a site-specific basis, PUB is unable to provide the modelled flood level without knowledge of the proposed development's location.	
2	How can consultants find out the modelled flood level requirement quickly because Minimum Platform Level (MPL) is the key information required during the early stages of project design.	Consultants/QPs may pre-consult PUB via <u>pub_one@pub.gov.sg</u> to determine if the modelled flood level is applicable to their CI/KI development. If the CI/KI is a building that is part of a larger development (e.g., electrical sub-station within a HDB estate), then the modelled flood level is only applicable to the CI/KI. PUB has also endeavored to advise government agencies during their pre-consultation with PUB (e.g., URA GLS, JTC's IGLS etc.) whether the modelled flood level would apply to the proposed development,	



		and consultants/QPs are reminded to check with their client agencies on the availability of this information.
3	How is the Minimum Platform Level (MPL) determined? Is it still taken at the road level where the internal drain discharge point is?	 The MPL is determined by taking the <u>highest</u> of the 3 levels <u>for a CI/KI</u> <u>development</u>: 4m SHD (if the development is located in the southern half of Singapore) or 4.5m SHD (if the development is located in the northern half of Singapore) 600mm above adjacent road if the CI/KI is not listed under "Special Facilities" as defined in <i>PUB's Code of Practice on Surface Water Drainage</i>, and 1m above adjacent road if the CI/KI is listed under "Special Facilities". 300mm above modelled flood levels (to be provided by PUB where applicable)
		different types of developments.
		Type of Developments General Multi-Unit Residential / Industrial / Commercial / Institutional Special Facilities (SF) / Devs with linkages to SF Road Level 9700mm, 600mm or 1m Private House Sopping Mail Entrance to MRT
		Minimum Platform (i) 4m SHD [#] for Southern Coast, 4.5m SHD for Northern Coast
		Level (whichever criteria is the formal back adjacent road for the formal back adjacent road for
		the highest) (iii) 300mm above modelled flood levels (for Cl/Kl) (for Cl/Kl)
		Crest Level 150mm 300mm - ingress/egress to basement to have extra crest above MPL above MPL
		*SHD: Singapore Height Datum Crest (Into basement)
4	Does the new Minimum Platform Level (MPL) requirement for Critical Infrastructure (CI) and Key Infrastructure (KI) apply to those projects that have already commenced?	The new MPL requirement is effective from the issuance date of the addendum on 16 Oct 2023.



		The change is applicable to new or redevelopment projects, where the Development Control (DC) submission has yet to be made on 16 October 2023; or the development's MPL has yet to be imposed by PUB. Please note that this requirement will not be applied to projects that have passed the design stage and are currently in progress, nor applicable to existing infrastructure (unless it is being redeveloped).
5	Could Critical Infrastructure (CI) and Key Infrastructure (KI) be indicated or included in the Drainage Interpretation Plan (DIP)?	The modelled flood level is generated on a site-specific basis and only applicable to developments with Cl/Kis. As such, it would not be included in the DIP, which is auto generated. In addition, consultants/QPs are reminded to check with their client agencies whether the development is classified as a Cl/KI, as Cl typologies are not available in the public domain. However, a clear indication is the need for such infrastructure to go through the security-by-design process by MHA. PUB's COPSWD has listed some typical KI typologies, but it is not exhaustive.
6	In the case of a development site with a significant level difference from the front to the rear, will PUB enforce to discharge to the front instead of the more practical option of gravity discharge to the sewer line at the rear?	Sanitary facilities and sewerage system of all developments shall be connected to a public sewer at a connection point, usually at public area, approved by PUB. QPs shall note that where there is public sewer at a public area for connection, retaining the existing drain-line connection to neighbouring premises will not be permitted. QPs can pre-consult PUB for projects with site/technical constraints.
7	Can the internal open drain and drainage sump pit be built within the sewer setback area?	PUB can accept such proposals provided that the proposed design complies with the Code of Practice for Surface Water Drainage and Code of Practice on Sewerage and Sanitary Works.
8	Is the inclusion of backwater analysis a new requirement for connecting outlet drains?	All runoff from the development site shall be discharged into a roadside drain as far as possible, so that the discharge would not be affected by backwater in outlet drains. If the development has to discharge into an outlet drain, the QP/consultant shall consult PUB to find out the downstream water level and conduct the necessary hydraulic assessments to ensure that the development's discharge



		point(s) are not impeded by the downstream water levels and that the development can discharge effectively.
9	Is there a proper rainwater harvesting submission framework in the pipeline from PUB given it is becoming a critical part of water use sustainability?	Since April 2019, PUB has published the " <u>Guidance Note for the</u> <u>Application of Rainwater Collection System</u> " to guide developers, owners and Consultants/QPs on the submission process and requirements to obtain PUB's approval.
10	How can we ensure compliance with PUB's requirement for weep holes in the retaining wall, as well as cut-off drains at the top and bottom, especially when it needs to be provided at the neighbouring lot?	The cut-off drains shall be located within the development site and not in the neighboring plot (refer to Clauses 5.3.2(a)(i) and 5.3.2(b)(ii) in the Code of Practice for Surface Water Drainage).
11	Is there a minimum width requirement for internal drains and drains connecting internal drains to road-side drains? Can the connecting drain be submitted by a different QP?	Aside from internal conduit drains (Clause 4.4.4 in the Code of Practice for Surface Water Drainage (COPSWD)), PUB stipulates outcome-based requirements for internal drains in COPSW). Under Clause 4.4.1 of the COPSW, internal drains shall be designed with sufficient capacity and openings to intercept and discharge all runoff from the development site. While PUB does not restrict submissions to be submitted only by a
		certain QP of the project team, internal drains (which includes the drains connecting to road-side drains) are reviewed and cleared at the Development Control (DC stage.
12	For sewer line, there is existing setback requirement of 2.5m from PUB including roof for working space, is there a requirement for vertical setback, say for sewer line of a 4-storey buildings.	Structures are required to be fully set back from the sewers based on the sewer setback clearance stipulated under PUB's Code of Practice on Sewerage and Sanitary Works. The purpose is to safeguard the space required to excavate and access the public sewers for repair when required. For proposals which cannot meet this requirement, QPs can pre-consult PUB with a solution that can still allow maintenance access to the sewer. One such alternate design that PUB allow is for the sewer to be housed in a reinforced concrete (RC) trench.



13	In the case of an existing building being converted for F&B use, is it permissible for the kitchen waste pipe to be laid below the restaurant hallway or at the side of the seating area, but not through the centre of the kitchen?	For A&A projects in existing buildings where there could be site constraints limiting the routing of new sanitary pipes, the QP can consider providing a raised floor in the F&B unit for the waste pipe to run underneath. There is no restriction to where the pipes can be laid within the F&B unit under this configuration, as long as it minimises the risk of food contamination should there be leak from the pipes. QPs can pre-consult PUB with alternate proposals that can prevent the risk of food contamination.
14	Does the guideline prohibiting sanitary pipes above food preparation areas apply to single landed residential houses?	The requirement to disallow the laying of new overhead sanitary pipes above food preparation areas only applies to multi-storey residential buildings (e.g. condominium, apartment, HDB block) and non- residential buildings. While it is not a requirement for single landed houses, it is still advisable that the QPs design the new sanitary system for landed houses following this guideline as well.

NEA	NEA		
S/N	QUESTIONS	ANSWERS	
1	Due to market trends, there is a growing need for more F&B conversions, particularly in malls. However, if the existing building structure is unable to comply with sanitary provisions, can this requirement be waived?	Each proposal would be assessed on a case-by-case basis. All developments to comply with the prevailing environmental requirements.	
2	What is the reasoning behind the requirement for a 5m radius clear space around cooling towers to avoid human thoroughfare?	Aerosols emitted from cooling towers contain Legionella bacteria and may pose a risk to human health during prolonged exposure. Hence, there is a need for a setback requirement between the cooling towers and areas for public access.	



3	Who is in charge for the provision of toilets for dormitories located outside of the construction site? Which department within NEA is responsible for specifying the sanitary requirements for dormitories within the construction site?	MOM is in charge for the provision of toilets for dormitories located outside of the construction site. Following COVID-19-episode, Ministry of Manpower (MOM) has issued guidance on the design of workers dormitories, including the provision of sanitary facilities. Please refer to attached link: <u>https://www.mom.gov.sg/- /media/mom/documents/press-releases/2021/0917annex-akey- improved-standards-for-new-dormitories.pdf</u>
4	We have submitted several applications (some in August and early September) through the NEA portal for workers' dormitory IPNO clearance. Please advise on the measures QP can take to facilitate early response.	You may contact the officers stated under "Workers Dormitory" in the attached link: <u>https://www.nea.gov.sg/our-</u> <u>services/development-</u> <u>control/consultation#Development%20Control%20Pre-</u> <u>Consultation%20Session%20For%20QPS</u> for your application status.
5	Can any "map" be shared on the NEA website regarding the health and safety buffer requirement?	Due to confidentiality and security concern, Agencies are not able to share the map of health and safety buffer.
6	For spray painting booths, is there any minimum separation distance for exhaust shaft to trafficable areas, or must the flue also be extended above highest floor?	There is no minimum separation distance requirement imposed for spray painting exhaust currently. The emissions from the spraying booth are to be treated prior to discharge and should not pose pollution and nuisance issues. However, workshops carrying out spray painting are considered as general industrial activities and the buffer requirement stated in the Singapore Standard SS593: 2013 Code of Practice for Pollution Control (COPPC) should be met.
7	Is there a minimum chimney height requirement for a 30/100m setback to the tallest structure? If the building portion encroaching into the radius is fully enclosed, can it be interpreted that the chimney is not within 30/100m?	The intention behind the MCH requirement is to facilitate flue gas dispersion and prevent potential downwash which will affect the ambient air quality at ground level. Hence, the MCH applies even if the building within the 30m/100m setback is fully enclosed.
8	If the developer has constructed a public infrastructure such as a bus stop that is now open for public use, who should be responsible to carry out the cleaning and provision of litter bin?	The land stakeholder should hand over the assets to NEA-DPC so that the area can be included in the cleaning schedule. Until then, the cleaning will be under stakeholder's responsibility.



LTA	LTA		
S/N	QUESTIONS	ANSWERS	
1	Any suggestions on how to streamline the CSC process for linkways and bus shelters?	We have streamlined the taking over process of roads by collapsing the CSC and taking overs stages into a single stage and advancing the taking over inspections mid-way of the maintenance period, instead of waiting for the maintenance period to expire. The CSC for linkways and bus shelters have already been streamlined prior to this as there is no separate taking over stage or maintenance period. We are happy to hear from the industry on any proposals to streamline the process further.	
2	Please share the rationale of requiring Architect QPs to submit and obtain DC clearance from LTA (Road). Is it possible for the C&S PE to handle this DC submission as an alternative?	Presently, a Professional Engineer can submit the DC submission to LTA. However, with CORENET X, the practitioner of the various discipline has to collaborate on the project design and submit a single model that incorporates the various design requirements of the respective disciplines. This is to encourage a more wholesome and deconflicted design.	
3	May we check what is the expected timeline for LTA to reply to the submission?	Depending on the complexity of the submission, the processing time will vary accordingly. For straightforward cases, with complete information submitted, it would take approximately 20 working days for LTA to respond.	
4	Can LTA establish a standard circular for service agencies to issue undertaking letters for services crossing public drains and footpaths, rather than waiting for LTA WD requesting for the undertaking letters?	A circular has been issued by ACES in the past providing guidance on the design to be adopted for overcrossing of drains. The agencies issuing the undertaking letters already have a standard LOU format.	
5	If there are new comments from LTA, can a fee waiver be considered?	You may submit a request for waiver of fees for our review.	



6	LTA impose road widening on surrounding road network, which is fully developed for property development. However, the land issue is not gazetted in the master planning. How should the consultant approach the respective landowner?	Generally, LTA will work with the developer/QP if the land adjacent to the development is required for road improvements.
7	For a large infrastructure project that involves multiple rounds of discussions and submissions with LTA and various technical departments, can LTA consider the scale of the project for the number of submissions?	The purpose of charging resubmission fees is to account for the processing time for each resubmission, and to incentivise QPs to ensure beforehand that their resubmissions are complete, compliant to requirements, and ready for full review. This will help to minimise the number of submissions (and therefore time) needed for eventual clearance, benefitting both the industry and regulatory agencies.
8	LTA imposes fees for the 4th submission onwards, but the comments or WD that are received are sometimes not consolidated. It would be appreciated if these could be consolidated.	LTA will strive to provide a complete reply on the submission, provided the submission is also complete.
9	Will LTA accept a declaration of non-compliance due to site space constraints without any safety concerns?	The non-compliance assessment should be made based on whether there is any safety concerns and accompanying mitigating measures proposed. The QP should state his professional view if there is a safety concern and how the safety risk can be brought down to an acceptable level. LTA is open to acceptance of non-compliances that do not lead to a safety risk.
10	When will LTA issue the submission checklist?	It is not clear the checklist is pertaining to which matter. Please reach out to us at <u>LTA-DBC_Registry@lta.gov.sg</u> to provide more information on the query.