

# **Suffolk County Council (20031377)**

Response by Suffolk County Council to Action Point No. 7  
Consequent Upon ISH4 on Environmental Matters and the draft  
Development Consent Order (dDCO)

## **Sunnica Energy Farm (EN010106)**

**Deadline 7**

**3 March 2023**

**ACTION POINT No.7** is addressed to Suffolk County Council and is as follows:

**Item 6 draft DCO and related matters: propose wording in Schedule 1 to the draft DCO with reference to the design of the proposed development, so as to enable the exclusion of parcels.**

1. The context for Action Point No.7 is the case advanced by the local authorities that, in line with the first step of the mitigation hierarchy (avoidance), there are certain parcels within the Application Site where the residual adverse impacts of the Applicant's proposals are such that all solar panels and related above ground infrastructure should be removed from those parcels because effective mitigation of the adverse impacts is not achievable and the residual adverse impacts are not acceptable. SCC's case in relation to these parcels is set out in the LIR (REP1-024), REP4-124 (Item 5), REP4-125 (Item 2), REP5-085 (response to ExQ2.0.9), and REP6-076 (section 2). REP5-085 provides references to the relevant parts of the LIR.
2. The parcels where removal of panels and related above ground infrastructure is sought (using the parcel numbers in the Parameter Plans in APP-135 and APP-136) are:

- (i) In SCC/WSC's areas: E05, E12, and E13
- (ii) In CCC/ECDC's areas: E05, W03-W12

Note: parcel E05 straddles the county boundary in the vicinity of the Lee Brook. SCC's primary concern is with the parcels within Suffolk but it supports the concerns expressed by the other local authorities as regards the parcels in Cambridgeshire, and this response addresses all of the parcels identified above.

3. Appendix 1 to this response is an amended version of Schedule 1 to the draft DCO with text additions and deletions (shown in red) which indicate how that Schedule of the dDCO could be revised to accommodate the exclusion of solar panels and other above ground infrastructure in Work Nos. 1 and 2 from the parcels listed above. The amendments also address the provision of green infrastructure (the subject of Work No. 6) and stone curlew reserves (the subject of Work No. 10) so far as related to those parcels.
4. Appendix 1 to this response was provided to the Applicant on Friday 24 February 2023 for its consideration, as requested by the Applicant at ISH4.
5. The commentary below provides an explanation of the amended text of Schedule 1 to the draft DCO (as set out in Appendix 1). The version of the draft DCO that has been used for this purpose is Rev 04 in REP6-014.
6. No changes are proposed to the definitions in paragraph 1.
7. In paragraph 2, changes are proposed to the scope of works included in Work Nos. 1A, 1B, 1C, 2C, 6A, 6B, 6c, and 10. A minor consequential change is also proposed in relation to the further associated development.
8. With regard to Work Nos. 1A, 1B, and 1C, these works allow the provision of solar modules, solar stations, electrical cables, monitoring and control systems, weather stations, and direct current electrical boxes. The amendments proposed by SCC provide that, with the exception of electrical

cables, no such works may be constructed on the land parcels specified in the revisions. In essence, this precludes solar panels and other above ground infrastructure in those land parcels.

9. Those specified land parcels (as shown in the Land and Crown Land Plans in REP6-005) correspond (with one exception) with the Parameter Plan parcels listed above, as follows:

Table 1: Parcel Correspondence Table

<b>Parameter Plan Parcel Nos. in APP-135 and APP-136</b>	<b>Land Plan Parcel Nos. in REP6-005</b>
E05	2-02, 3-01
E12	5-03 (also includes Parcel EC03)
E13	5-07, 7-01
W03-W12	10-21, 11-07, 11-08, 12-02,13-02,13-04,14-01, 14-02, 14-03

10. Table 1 shows parcels E05, E12, and E13 and their respective land parcels separately so as to allow those parcels to be considered individually in the event that the Examining Authority wishes to do so. SCC does not understand that CCC/ECDC are seeking individual treatment of the parcels in Sunnica West A that they wish to see removed, so they have not been separated out in Table 1 (but this could be done if required).

11. It should be noted that Land Parcel 5-03, which would be subject to the revisions to Work No. 1B proposed by SCC, is more extensive than Parcel E12 because it also includes Parcel EC03. In Work No. 1B only the work in sub-paragraph (a)(iii) is proposed in Parcel EC03 (as shown on Sheet 5 of the Works Plans in REP6-006), and the revisions proposed by SCC do not seek to preclude that work (electrical cables) from being carried out because it is not above ground infrastructure. There is no need, therefore, to distinguish between Parcels E12 and EC03 for the purpose of the amendments that SCC proposes to Work No. 1B.

12. If no solar panels or other above ground infrastructure are provided in the specified land parcels in Table 1, there may be no need for any electrical cables as authorised by Work No. 1 in those parcels. However, SCC has not sought by its amendments to preclude their provision because (a) they are not above ground infrastructure, and (b) it is not clear (to SCC at least) from perusal of the works plans in REP6-006 whether any of those electrical cables would or might be required in addition to the works in Work No. 4, and SCC sees no reason to preclude such electrical cable works if they are required.
13. With regard to Work No. 2C (the BESS for Sunnica West A), there would be no need for this work if solar panels and other above ground infrastructure were to be excluded from parcels W03-W12, and so SCC proposes its deletion as a consequential amendment in the event that those parcels are excluded.
14. With regard to Work No. 6 (green infrastructure), SCC proposes amendments so that any such green infrastructure can only be provided within the specified land parcels in Table 1 if it is for purposes associated with the electrical cable works in those parcels authorised either by Work No. 1 or by Work No. 4. This would allow, for example, landscaping that was associated with such cabling works to be provided, but would not otherwise allow (or require) green infrastructure in parcels that were not to accommodate solar panels or other above ground infrastructure.
15. With regard to Work No. 10 (stone curlew reserves), there are three such areas: EC01 and EC02, which are associated with E05, and EC03, which is associated with E12 and E13. The amendments proposed by SCC in Appendix 1 include (in italics and inside square brackets) some explanatory text which is elaborated here. If the ExA recommends to the Secretary of State that all solar panels and other above ground infrastructure in Work No.1 should be excluded from parcels E05, E12, and E13, there would appear to be no need for Work No. 10. However, before Work No. 10 is removed from Schedule 1 to the draft DCO, SCC would request that the ExA seeks confirmation from the Applicant (via its ecological advisers), that none of the

remaining parts of the development would require the provision of any stone curlew offsetting measures. If that confirmation is provided, Work No. 10 could be removed from Schedule 1.

16. If solar panels are to be retained in one or more of parcels E05, E12, or E13 (or such confirmation from the Applicant is not forthcoming), there would still be a need for Work No. 10 to be retained in Schedule 1 to the draft DCO. Within Schedule 1, the scope of Work No. 10 is not described, so it is not necessary for SCC to propose amendments to Schedule 1 to address the different permutations that may arise in relation to parcels EC01, EC02, or EC03, depending on whether solar panels are to be retained in E05, E12, or E13. Work No. 10, as described in Schedule 1, would be unchanged whether the stone curlew reserves were to be required in each of parcels EC01, EC02, or EC03, or only in some of them.
17. However, it would be necessary for there to be revisions to the Offsetting Habitat Provision for Stone Curlews Specification (REP5-047), dependent upon the terms of any recommendations made by the ExA. It would be via revisions to that document that the question of whether parcels EC01, EC02, or EC03 should form part of the required stone curlew reserves would be determined. It would be open to the Secretary of State to request that such a revision be submitted, having considered any recommendations of the ExA.
18. Finally, if Work No. 10 were to be removed from Schedule 1 to the draft DCO, there would be a need for a minor consequential change to the introductory text to the list of further associated development. At present, that text refers to “*Work Nos. 1 to 10*” but that would become “*Work Nos. 1 to 9*” if there is no Work No. 10.

APPENDIX 1: Proposed changes to Schedule 1 of the draft DCO

# SCHEDULES

## SCHEDULE 1

Article 2

### AUTHORISED DEVELOPMENT

#### 1. In this Schedule—

“battery stations” means a station comprising transformers, switchgear, power conversion system (PCS) or inverter, and other ancillary equipment with each component for each battery station either—

(a) located outside, with a concrete foundation slab or concrete piling for each of the inverters and transformers and a levelling layer of thick sand with a concrete perimeter pavement for the switchgear; or

(b) housed together within a container sitting on a concrete foundation slab or concrete piling;

“East A Site” means land that forms part of the authorised development located south of Isleham in Cambridgeshire and Suffolk as shown on the works plans;

“East B Site” means land that forms part of the authorised development located between Worlington and Freckenham in Suffolk as shown on the works plans;

“energy storage” means equipment used for the storage of electrical energy;

“existing substation” means the existing substation at Burwell, Weirs Drove, Burwell, Cambridge CB25 0BP, owned and operated by NGET;

“inverter” means electrical equipment required to convert direct current power generated to alternating current;

“mounting structure” means a frame or rack made of galvanised steel or other material designed to support the solar modules and mounted on piles driven into the ground by one of the following methods: piles rammed into a pre-drilled hole, a pillar attaching to a steel ground screw, pillars fixed to a concrete foundation, or a pillar set in concrete in a pre-made hole in the ground (micro piled);

“permissive paths” means new access tracks providing restricted public access within the Order limits along the route shown in Annex A to the outline landscape and ecology management plan;

“solar module” means a solar photovoltaic panel designed to convert solar irradiance to electrical energy fitted to mounting structures;

“solar stations” means a station comprising inverters, transformers and switchgear with each component for each solar station either—

(a) located outside, with a concrete foundation slab for each of the inverters, transformers and switchgear and a levelling layer of thick sand with a concrete perimeter pavement; or

(b) housed together within a container sitting on a concrete foundation slab and a levelling layer of thick sand with a concrete perimeter pavement;

“substation” means a compound, containing electrical equipment required to switch, transform, convert electricity and provide reactive power compensation mounted on a reinforced foundation slab or piling;

“switchgear” means a combination of electrical disconnect switches, fuses or circuit breakers used to control, protect and isolate electrical equipment;

“transformer” means a structure containing an electrical device to transform electricity by increasing or reducing the voltage; and

“West A Site” means the land that forms part of authorised development located within the southern fields of the Chippenham Park Estate bordering the A11 and A14 corridor in Cambridgeshire as shown on the works plans.

2. In the Districts of West Suffolk and East Cambridgeshire in the Counties of Cambridgeshire and Suffolk a nationally significant infrastructure project as defined in sections 14 and 15 of the 2008 Act and associated development under section 115(1)(b) of the 2008 Act.

The nationally significant infrastructure project comprises up to one generating station with a gross electrical output capacity of over 50 megawatts comprising all or any of the work numbers in this Schedule or any part of any work number in this Schedule—

**Work No. 1**— a ground mounted solar photovoltaic generating station with a gross electrical output capacity of over 50 megawatts including—

(a) **Work No. 1A**— **subject to sub-paragraph (aa)**, works on the East A Site comprising—

- (i) solar modules;
- (ii) solar stations;
- (iii) electrical cables including electrical cables connecting to Work No. 3A;
- (iv) monitoring and control systems housed within a control room building or container; and
- (v) weather stations and direct current (DC) electrical boxes.

**(aa) Other than works comprised within or for the purposes of sub-paragraph (a)(iii), Work No. 1A works must not be constructed on the land labelled plots 2-02 and 3-01 on the land plans.**

(b) **Work No. 1B**— **subject to sub-paragraph (ba)**, works on the East B Site comprising—

- (i) solar modules;
- (ii) solar stations;
- (iii) electrical cables including electrical cables connecting to Work No. 3B;
- (iv) monitoring and control systems housed within a control room building or container; and
- (v) weather stations and DC electrical boxes.

**(ba) Other than works comprised within or for the purposes of sub-paragraph (b)(iii), Work No. 1B works must not be constructed on the land labelled plots 5-03, 5-07, and 7-01 on the land plans, and**

(c) **Work No. 1C**— **subject to sub-paragraph (ca)**, works on the West A Site comprising—

- (i) solar modules;
- (ii) solar stations;
- (iii) electrical cables including electrical cables connecting to Work No. 3C;
- (iv) monitoring and control systems housed within a control room building or container; and
- (v) weather stations and DC electrical boxes.

**(ca) Other than works comprised within or for the purposes of sub-paragraph (c)(iii), Work No. 1C works must not be constructed on the land labelled plots 10-21, 11-07, 11-08, 12-02, 13-02, 13-03, 13-04, 14-01, 14-02 and 14-03 on the land plans,**

and associated development within the meaning of section 115(2) of the 2008 Act including—

**Work No. 2**— an energy storage facility of up to 500 megawatts of power at the point of grid connection including—

(a) **Work No. 2A**— a battery energy storage compound on the East A Site comprising— (i) battery energy storage cells;

- (ii) a structure protecting the battery energy storage cells comprised in Work No. 2A(i) and ancillary equipment, being either one container or multiple containers joined to each other, mounted on a reinforced concrete foundation slab or concrete piling;
- (iii) heating, ventilation and air conditioning (HVAC) or liquid cooling systems either housed within the containers comprised in Work No. 2A(ii), attached to the side or top of each of the containers, or located separate from but near to each of the containers;
- (iv) battery stations;



- (v) monitoring and control systems housed within a container with the HVAC or liquid cooling systems in Work No. 2A(iii) or located separately in its own container or control room;
  - (vi) electrical cables including electrical cables connecting to Work No. 3A;
  - (vii) fire safety infrastructure comprising fire suppression system; and
  - (viii) a water storage structure for the purposes of firefighting comprising fire water tanks and fire water containment.
- (b) **Work No. 2B**— a battery energy storage compound on the East B Site comprising— (i) battery energy storage cells;
- (ii) a structure protecting the battery energy storage cells comprised in Work No. 2B(i) and ancillary equipment, being either one container or multiple containers joined to each other, mounted on a reinforced concrete foundation slab or concrete piling;
  - (iii) heating, ventilation and air conditioning (HVAC) or liquid cooling systems either housed within the containers comprised in Work No. 2B(ii), attached to the side or top of each of the containers, or located separate from but near to each of the containers;
  - (iv) battery stations;
  - (v) monitoring and control systems housed within a container with the HVAC or liquid cooling systems in Work No. 2B(iii) or located separately in its own container or control room;
  - (vi) electrical cables including electrical cables connecting to Work No. 3B;
  - (vii) fire safety infrastructure comprising fire suppression system; and
  - (viii) a water storage structure for the purposes of firefighting comprising fire water tanks and fire water containment.
- (c) ~~Work No. 2C— a battery energy storage compound on the West A Site comprising—~~
- (i) ~~battery energy storage cells;~~
  - (ii) ~~a structure protecting the battery energy storage cells comprised in Work No. 2C(i) and ancillary equipment, being either one container or multiple containers joined to each other, mounted on a reinforced concrete foundation slab or concrete piling;~~
  - (iii) ~~heating, ventilation and air conditioning (HVAC) or liquid cooling systems either housed within the containers comprised in Work No. 2C(ii), attached to the side or top of each of the containers, or located separate from but near to each of the containers;~~
  - (iv) ~~battery stations;~~
  - (v) ~~monitoring and control systems housed within a container with the HVAC or liquid cooling systems in Work No. 2C(iii) or located separately in its own container or control room;~~
  - (vi) ~~electrical cables including electrical cables connecting to Work No. 3C;~~
  - (vii) ~~fire safety infrastructure comprising fire suppression system; and~~
  - (viii) ~~a water storage structure for the purposes of firefighting comprising fire water tanks and fire water containment.~~

**Work No. 3**— onsite substations including—

- (a) **Work No. 3A**— works on the East A Site comprising— (i) substation;
- (ii) control building or container;
- (iii) welfare facilities;
- (iv) hardstanding areas; and
- (v) electrical cables including electrical cables connecting to Work Nos. 1A, 2A and 4;
- (b) **Work No. 3B**— works on the East B Site comprising— (i) substation;
- (ii) shunt reactor;
- (iii) control building or container;

- (iv) welfare facilities;
- (v) hardstanding areas; and
- (vi) electrical cables including electrical cables connecting to Work Nos. 1B, 2B and 4; and
- (c) **Work No. 3C**— works on the West A Site comprising—
  - (i) substation;
  - (ii) control building or container;
  - (iii) welfare facilities;
  - (iv) hardstanding and parking areas; and
  - (v) electrical cables including electrical cables connecting to Work Nos. 1C, 2C and 4.

**Work No. 4**— works to lay electrical cables and temporary construction laydown areas for the electrical cables including—

- (a) electrical cables connecting Work No. 3A to Work No. 3B;
- (b) electrical cables connecting Work No. 3B to Work No. 3C;
- (c) electrical cables connecting Work No. 3C to the existing substation; and
- (d) up to 15 temporary construction laydown areas comprising—
  - (i) areas of hardstanding, compacted ground or track matting; (ii) car parking;
  - (iii) area to store materials and equipment;
  - (iv) site and welfare offices and workshops;
  - (v) security infrastructure, including cameras, perimeter fencing and lighting;
  - (vi) safety infrastructure to warn and manage traffic when crossing roads or other obstacles;
  - (vii) site drainage and waste management infrastructure (including sewerage); and (viii) electricity, water, waste water and telecommunications connections.

**Work No. 5**— Not Used.

**Work No. 6**— works to create, enhance and maintain green infrastructure, including—

- (a) **Work No. 6A**— **subject to sub-paragraph (ab)**, works on the East A Site comprising—
  - (i) soft landscaping including planting;
  - (ii) landscape and biodiversity enhancement measures;
  - (iii) earth works;
  - (iv) permissive paths;
  - (v) hard standing and hard landscaping;
  - (vi) drainage and irrigation infrastructure and improvements or extensions to existing irrigation systems;
  - (vii) fencing, gates, boundary treatment and other means of enclosure; and
  - (viii) improvement, maintenance and use of existing private tracks.

**(ab) Other than for the purposes associated with the works comprised in the works within sub-paragraph (a)(iii) of Work No. 1A or within Work No. 4, Work No. 6A must not be constructed on the land labelled plots 2-02 and 3-01 on the land plans.**
- (b) **Work No. 6B**—**subject to sub-paragraph (ba)**, works on the East B Site comprising—
  - (i) soft landscaping including planting;
  - (ii) landscape and biodiversity enhancement measures;
  - (iii) earth works;
  - (iv) permissive paths;
  - (v) hard standing and hard landscaping;

- (vi) drainage and irrigation infrastructure and improvements or extensions to existing irrigation systems;
- (vii) fencing, gates, boundary treatment and other means of enclosure; and
- (viii) improvement, maintenance and use of existing private tracks.

(ba) Other than for the purposes associated with the works comprised in the works within sub-paragraph (b)(iii) of Work No. 1B or within Work No. 4, Work No. 6B must not be constructed on the land labelled plots 5-03, 5-07 and 7-01 on the land plans, and

(c) **Work No. 6C**— subject to sub-paragraph (ca), works on the West A Site comprising—

- (i) soft landscaping including planting;
- (ii) landscape and biodiversity enhancement measures;
- (iii) earth works;
- (iv) hard standing and hard landscaping;
- (v) drainage and irrigation infrastructure and improvements or extensions to existing irrigation systems;
- (vi) fencing, gates, boundary treatment and other means of enclosure; and
- (vii) (vii) improvement, maintenance and use of existing private tracks.

(ca) Other than for the purposes associated with the works comprised in the works within sub-paragraph (c)(iii) of Work No. 1C or within Work No. 4, Work No. 6C must not be constructed on the land labelled plots 10-21, 11-07, 11-08, 12-02, 13-02, 13-03, 13-04, 14-01, 14-02 and 14-03 on the land plans.

**Work No. 7**— temporary construction laydown areas including—

(a) **Work No. 7A**— a temporary construction laydown area on the East Site A comprising—

- (i) areas of hardstanding;
- (ii) car parking;
- (iii) site and welfare offices and workshops;
- (iv) security infrastructure, including cameras, perimeter fencing and lighting;
- (v) site drainage and waste management infrastructure (including sewerage); and
- (vi) electricity, water, waste water and telecommunications connections;

(b) **Work No. 7B**— up to five temporary construction laydown areas on the East Site B comprising—

- (i) areas of hardstanding;
- (ii) car parking;
- (iii) site and welfare offices and workshops;
- (iv) security infrastructure, including cameras, perimeter fencing and lighting;
- (v) site drainage and waste management infrastructure (including sewerage); and
- (vi) electricity, water, waste water and telecommunications connections; and

(c) **Work No. 7C**— up to three temporary construction laydown areas on the West Site A comprising—

- (i) areas of hardstanding;
- (ii) car parking;
- (iii) security infrastructure, including cameras, perimeter fencing and lighting; (iv) site drainage and waste management infrastructure (including sewerage); and (v) electricity, water, waste water and telecommunications connections.

**Work No. 8**— warehouse buildings and permanent compounds comprising—

- (a) **Work No. 8A**— warehouse building and a permanent compound on the East Site A comprising—
  - (i) a warehouse building for the storage for spare parts and office and welfare facilities;
  - (ii) a canteen either located within the warehouse building within Work No. 8A(i) or in a separate container or building;
  - (iii) waste skips;
  - (iv) parking areas; and
  - (v) a permanent compound area; and
- (b) **Work No. 8B**— warehouse building and a permanent compound area on the East Site B comprising—
  - (i) a warehouse building for the storage of spare parts and office and welfare facilities;
  - (ii) a canteen either located within the warehouse building within Work No. 8B(i) or in a separate container or building;
  - (iii) waste skips;
  - (iv) parking areas; and
  - (v) a permanent compound area.

**Work No. 9**— works to existing streets to facilitate access to Work Nos. 1 to 8.

*[Either]*

~~**Work No. 10**— works to create and maintain stone curlew reserve.~~

*[The deletion of Work No.10 would be in the event that the ExA recommends to the Secretary of State that all panels (and related above ground works) should be removed from parcels E05, E12, and E13 and the Applicant provides to the Examination confirmation from its ecologists that the remaining parts of the development do not require the provision of any stone curlew offsetting measures.]*

*[or]*

**Work No. 10**— works to create and maintain stone curlew reserve.

*[The retention of Work No. 10 would be in the event that the ExA recommends to the Secretary of State that panels (and related above ground works) should not be removed from one or more of parcels E05, E12, or E13. In that eventuality, there would still be a need for Work No.10 to provide for stone-curlew offsetting. The scope of Work No. 10 is not defined in Schedule 1 but is derived from the terms of Requirement 10 in Schedule 2 in conjunction with the certified offsetting habitat provision for stone curlews specification in Schedule 10. It is that specification that may require consequential revision, depending on the nature of the ExA's recommendation. For example, if there were to be no panels in parcels E12 and E13, the specification would not require parcel EC03 to be laid out for stone curlew offsetting. However, if panels were to be retained in parcel E05, the stone curlew offsetting in parcels EC01 and EC02 would still be required.]*

In connection with and in addition to Work Nos. 1 to [9] or [10] further associated development comprising such other works or operations as may be necessary or expedient for the purposes of or in connection with the authorised development, and which are within the Order limits and fall within the scope of the work assessed by the environmental statement, including—

- (a) works within highways, including—
  - (i) alteration of the layout of any street permanently or temporarily, including increasing or reducing the width of the carriageway of any street by increasing or reducing the width of any kerb, footway, cycleway, or verge within the street including removal of any vegetation; and altering the level or increasing the width of any such kerb, footway, cycleway or verge within the street including removal of any vegetation; and works for the strengthening, improvement, repair, maintenance or reconstruction of any street;

- (ii) street works, including breaking up or opening a street, or any sewer, drain or tunnel under it, and tunnelling or boring under a street;
  - (iii) relocation, removal or provision of new road traffic signs, signals, street lighting, road restraints and carriageway lane markings;
  - (iv) works to place, alter, remove or maintain street furniture or apparatus (including statutory undertakers' apparatus) in, under or above a street, including mains, sewers, drains, pipes, cables, cofferdams, lights, fencing and other boundary treatments; and
  - (v) works to facilitate traffic management and to deliver information relating to the authorised development; and
- (b) other works and development including—
- (i) works for the provision of fencing and security measures such as CCTV, columns, lighting and communication boxes;
  - (ii) laying down of internal access tracks, ramps, means of access, footpaths, roads and cycle routes;
  - (iii) bunds, embankments, trenching and swales;
  - (iv) boundary treatments, including means of enclosure;
  - (v) glint and glare boarding;
  - (vi) laying out and surfacing of permissive paths, including the laying and construction of drainage infrastructure, signage and information boards;
  - (vii) foundations for structures or buildings being piles driven into the ground, piles rammed into a pre-drilled hole, a pillar attaching to a steel ground screw, pillars fixed to a concrete foundation, or a pillar set in concrete in a pre-made hole in the ground (micro piled);
  - (viii) works to the existing irrigation system and works to alter the position and extent of such irrigation system;
  - (ix) electrical, gas, water, foul water drainage and telecommunications infrastructure connections and works to, and works to alter the position of, such services and utilities connections;
  - (x) works to alter the course of, or otherwise interfere with, non-navigable rivers, streams or watercourses;
  - (xi) surface water drainage systems, storm water attenuation systems including storage basins, oil water separators, including channelling and culverting and works to existing drainage systems;
  - (xii) site establishments and preparation works including site clearance (including vegetation removal, demolition of existing buildings and structures); earthworks (including soil stripping and storage and site levelling) and excavations; the alteration of the position of services and utilities; and works for the protection of buildings and land; and

tunnelling, boring and drilling works.