



**SEAS Rebuttal to REP4-086 the Applicants response to
ACTION POINT 106 – Working Hours**

**SEA LINK: EN020026
DEADLINE: 5 – 10 March 2026**

**SEAS IP: [REDACTED]
Date: 10 March 2026**

Please find SEAS Rebuttal of [REP4-086] The Applicant’s Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2):

Action Point	ExA Description	Applicant’s response	SEAS Rebuttal:
AP106	Applicant to confirm whether bank holiday working could be by agreement with the local planning authority rather than permitted within set hours (as currently included in the dDCO). This is given that the applicant has suggested that bank holiday working would be unlikely and it is also possible that necessary works on bank holidays could be programmed in advance with local authority agreement.	The Applicant has considered programme implications and risk for the Proposed Project, and has concluded that it can accommodate the exclusion of bank holidays from the core working hours at the converter station site in Suffolk and the converter and substation site in Kent (except by agreement with the local planning authorities), without prejudicing its ability to accelerate the project in accordance with the NESO Clean Power 2030 objectives. Furthermore, and recognising the desirability of this outcome to stakeholders and communities, the Applicant is also able	SEAS welcomes the Applicant’s acknowledgement that bank holidays and associated weekends should not normally be worked at the converter station sites. However, the proposed controls remain materially weaker than those already secured for comparable infrastructure in the area. For the nearby Friston/Kiln Lane substation, construction hours were restricted to 07:00–19:00 Monday–Friday and 07:00–13:00 Saturday, with no working on Sundays or Bank Holidays. SEAS considers that the same standard should apply to the proposed converter station, given its similar scale,

		<p>to agree that for the bank holiday Mondays that form part of a 'bank holiday weekend' (meaning Easter Monday, the early May bank holiday, the Spring bank holiday, and the summer bank holiday) the associated (preceding) Saturday and Sunday are also not worked. This is facilitated by the likely implications of the exclusion of the bank holiday Mondays on contractor shift patterns, and also reflects the fact that the Applicant does not anticipate working every weekend in all areas of the project at all times in any case. On this basis, the Applicant is comfortable reducing its flexibility in the manner proposed at the converter station sites, although further limitations would introduce unacceptable risks to the ability to programme and deliver the works in a sufficiently timely manner. This reduction in flexibility is proposed specifically at the converter station site in Suffolk and the converter and substation site in Kent, because it is acknowledged that these are large static construction sites where work will be being undertaken for 4-5 years (as opposed to smaller</p>	<p>duration, and proximity to residential communities.</p> <p>Furthermore, these working hour controls should apply across all elements of the project, not solely the converter station sites. Even where works are described as "transient", such as cabling operations, these activities frequently occur in close proximity to villages, residential properties, and community receptors, and can therefore cause significant disturbance.</p> <p>Periods of predictable respite are an important component of safeguarding community health, wellbeing, and the local visitor economy. The assertion that no mitigation is required does not adequately reflect the cumulative pressures already highlighted within the Examination</p> <p>SEAS therefore considers that Requirement 7 should adopt the Friston precedent and apply consistent working hour limits to all project works, ensuring predictable periods of respite for communities already facing cumulative impacts from multiple infrastructure schemes in the area.</p>
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