



Your reference EN010119

Our reference TYRRF/340049-19

19 December 2025

FOR THE ATTENTION OF JOHN WHEADON,  
HEAD OF ENERGY INFRASTRUCTURE  
PLANNING DELIVERY & INNOVATION

Recipient's name

Department for Energy Security & Net Zero  
3-8 Whitehall Place  
London  
SW1A 2AW

Dear Sir

**Application by North Falls Offshore Wind Farm Limited ("the Applicant") for an Order granting Development Consent for the proposed North Falls Offshore Wind Farm ("the Proposed Development")**

We act for London Gateway Port Limited (**LGPL**). We refer to your letter of 26 November 2025 (addressed to LGPL and others). We apologise that our response is slightly beyond the deadline.

In your letter, you requested that LGPL and the Applicant provide you with an update on any further agreement regarding the form of protective provisions (PPs) for the benefit of LGPL to be included in the Order, if made.

LGPL set out its position at the close of the Examination in document REP8-088 to the effect that LGPL did not agree with the form of the PPs submitted by the Applicant and, instead, LGPL required PPs in the form set out in REP7-079.

LGPL has heard nothing further from the Applicant since the close of the Examination. We contacted Pinsent Masons LLP who act on behalf of the Applicant on 5 December 2025. They confirmed that the Applicant's position remains that no PPs are required for LGPL and as such the Applicant does not intend to negotiate the form of the PPs with LGPL.

LGPL is disappointed by this position which means that the parties will not be able to progress towards an agreed position to assist the Secretary of State. LGPL has no option but to confirm and reiterate that its position is that the form of the PPs set out in REP7-079 is required.

Yours faithfully

**Addleshaw Goddard LLP**

(Sent electronically, unsigned but approved by above)

Direct line

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