FAREHAM
BOROUGH COUNCIL

Jayson Grygiel
Gosport Borough Council

David Hayward,
Havant Borough Council

Lucy Howard,
Portsmouth City Council

Letter sent by email only

Contact Lee Smith

[redacted]

Date 26 November 2025

Dear Jayson, David and Lucy,

Housing and employment need in South-East Hampshire

Thank you for hosting the Duty to Cooperate meeting on 9 October and for your follow-up letter of 13 October 2025 regarding Housing and Employment need in South-East Hampshire.

I can confirm that I have shared and discussed your letter with the Executive Leader of this Council (Councillor Simon Martin) and the Executive Member for Planning and Development (Councillor Malcolm Daniells). The following response has been agreed with those Members.

Fareham Borough Council considers the approach of jointly addressing the duty to cooperate issue as constructive and informative and is committed to continuing work on sub-regional matters in a positive and constructive way.

Fareham Borough Council has met with the three authorities on an individual basis a number of times over recent years, with cooperation on the Fareham Local Plan 2037, and more recently with the progression of the three Local Plans in question. This approach of considering the issues at a South-East Hampshire scale provides a consistent and effective consideration of the challenges and approach to dealing with them. To that end, the letter of 13 October sets out the position of the three planning authorities regarding housing and employment need and supply position and makes the requirements very clear.

Fareham recognises the total combined unmet need figure for the three authorities of 18,347 homes against the 2024 Standard methodology and acknowledges how this differs from numbers previously identified by the Partnership for South Hampshire (PfSH). As part of our responses to local plan consultations and to previous duty to cooperate discussions, we have also considered the various methodologies used in assessing the availability of land and have endorsed conclusions as far as leaving ‘no stone unturned’ is considered.

The Fareham Local Plan 2037 was adopted in April 2023 and represents one of the few up-to-date Local Plans in Hampshire. It is also the only adopted plan locally that includes a commitment towards unmet need. The Plan allocates a total of 900 dwellings towards PfSH unmet need, 800 of which are specifically allocated (within the Plan wording) to Portsmouth. The remaining 100 dwellings is towards wider unmet needs in the area.

In this Council's opinion, it would be appropriate for the three authorities to discuss and agree how the 100 dwellings are apportioned between them. Once a decision has been reached by the three authorities in question, Fareham would welcome a formal approach and agreement on this matter.

As well as making a contribution towards unmet need through its current adopted local plan, this Council has also been very proactive in ensuring that all necessary 'ecological infrastructure' (which I will expand on further below) is in place to ensure that the delivery of housing and employment is able to take place without delay.

During recent years, there has been an increasing awareness of the impacts of increased levels of nitrates upon nationally protected sites around the coast. Ensuring the impacts of nitrates upon Habitat sites are appropriately mitigated, is an integral issue in deciding planning proposals. In many instances planning permission for new housing cannot be granted in the absence of mitigation and much of the mitigation needs to achieved 'off site'.

In addition, the Government's policies for biodiversity net gain (BNG) have been implemented, whereby a 10% uplift in BNG is sought as an integral part of many developments. Whilst the potential to deliver the 10% BNG uplift on site may be achievable for some developments, in many instances offsite solutions are required.

There are also important areas along the south coast which are identified as sites for over wintering birds including Brent Geese, some of which may have potential for housing or other development. Where the reduction or loss of these sites is necessary or unavoidable, alternative mitigation land needs to be provided and appropriately safeguarded.

Fareham Borough Council has been proactive through both direct delivery and working with others to ensure that land is delivered within the Borough which mitigates the impacts of nutrients, is available for the offsite provision of biodiversity net gain and secures land for overwintering birds and Brent Geese (I have collectively termed these three areas as 'ecological infrastructure'). Many of these sites to date have been identified and established within the gap between Fareham, Stubbington and Gosport.

This Council is about to undertake further work to establish the extent and number of further sites which could be brought forward within the Borough to deliver additional ecological infrastructure. Such sites are critical in bringing forward development, whilst ensuring that important environmental provisions are delivered. The intention is that identified sites will be available to facilitate both the delivery of development within the Borough along with the development delivered within neighbouring authorities including Gosport, Havant and Portsmouth.

The Council acknowledges the remaining deficit of 19,973 square metres of new employment floorspace across the three authorities and notes the request for help with this unmet need.

Fareham recognises the importance of a strong, responsive and competitive economy, alongside the delivery of housing delivery. The promotion of economic development is one of the Council's six corporate priorities.

The adopted Fareham Local Plan 2037 identifies an employment floorspace requirement across the Plan period of 121,964 square metres of employment floorspace. The Local Plan allocated seven new sites to meet this requirement, two of these sites (Faraday and Swordfish) form the strategic site at Daedalus. These seven sites are in addition to the strategic site at Welborne (allocated through the Welborne Plan). Between them, Welborne and Daedalus contribute 77% of the anticipated supply.

At point of adoption the plan identified a supply of 241,754 square metres of employment floorspace, an excess of 119,790 square metres compared to the requirement. The Inspector at the Local Plan examination recognised the value and importance of the two strategic sites and welcomed the inclusion of the additional sites to facilitate some flexibility and choice in the local market. To maximise flexibility the Local Plan does not allocate these sites for a particular use class, rather all employment allocations are for mixed employment use.

As the Council's local plan is adopted, the Council is not in a position to include any wording within the current Plan, committing some of this supply to unmet need. Fareham Borough Council is willing to commit 19,973 square metres of its employment floorspace towards Havant Borough Council's unmet need and would welcome a further dialogue with Havant Borough Council to agree how best to achieve this.

With regards to making a further contribution to housing unmet need, the Council is unable to commit to anything further at this point in time. The Council's review of the Local Plan will need to be undertaken through the new Local Plan system. The Council is awaiting the publication of further legislation and guidance regarding the new plan-making system. This approach is in accordance with our Local Development Scheme (LDS) which acknowledges that the timetable in the LDS will be subject to the progression of legislation, national planning policy and any transitional arrangements for these reforms.

Any future review of the Plan will of course be conducted within the new framework of the regulations and guidance, and we will engage with you as part of that process.

Please let me know if I can assist any further.

Yours sincerely,



Lee Smith
Head of Planning