#### Willoughby Waterleys Residents Association (WWRA)

Consultation Response on the Whetstone Pastures Garden Village (WPGV) Concept Framework Plan

30 October 2025

#### 1. Introduction

Willoughby Waterleys is a small conservation village south of Leicester and the settlement most directly affected by the proposed Whetstone Pastures Garden Village (WPGV). The WWRA represents most residents and was formed after the 2018 Leicester & Leicestershire Strategic Growth Plan (SGP), which depended on the now-abandoned A46 Expressway. Despite this, County's Authorities continue to pursue growth based on that flawed premise. WWRA proposed a more sustainable alternative in 2019—eight miles shorter and improving M1 Junction 21—which remains viable, yet no Authority has reviewed it. The WPGV continues to promote an unsustainable, car-dependent model.

## 2. Strategic Planning Context

Leicestershire Councils produced the 2018 SGP and several Statements of Common Ground (SoCGs) through the Members' Advisory Group, but have failed to reassess spatial strategy since the Expressway's cancellation in 2020. Leicester's unmet housing need of 18,694 homes (2022 SoCG) allocated 5,536 to Blaby and 1,968 to Harborough. This growth focus on the south and east was never tested against alternatives or costed for infrastructure. With 2024 NPPF changes and removal of the 35% uplift, Leicester's unmet need falls to around 7,500 homes, with a new SoCG pending.

# 3. Blaby District

Blaby District Council (BDC) lacks both an up-to-date Local Plan and a five-year housing supply. WPGV is expected to feature in its draft Plan when issued—a high-risk inclusion given unresolved viability concerns. Reg 19 consultation has been repeatedly delayed, awaiting a new SoCG. BDC's housing target rose from 341 to 559 homes per year in 2024 (2025–2042), requiring 9,978 homes including 5% buffer. Current allocations and consents total about 4,600, leaving roughly 5,400 new allocations to be found—plus Leicester's unmet need. However, around 2,500–3,000 homes have been approved or identified, limiting scope for further major sites. Given uncertainty over housing need, plan timing, and Tritax's admission that no application will precede plan adoption, this consultation is premature.

## 4. Harborough District

Harborough District's Reg 19 Plan (early 2025) excludes WPGV, despite its earlier promotion. This must confirm HDC's view that the site is unsustainable in isolation.

## 5. Concept Framework Plan (CFP) Issues

The CFP raises multiple concerns regarding transport, employment, infrastructure, and deliverability.

- M1 Junction 20a Unapproved by National Highways or Leicestershire County Council. Funding is unclear; Tritax will only pay a 'share'. A new junction risks worsening congestion at J21 and across south Leicestershire.
- Employment Land Proposes 320,000 m<sup>2</sup> of logistics (B8) use in Blaby based on flawed 2021 evidence. Claims of sustainability are unconvincing: most residents will commute elsewhere,

increasing congestion. Westbound freight movements, ignored in the CFP, would further pressure M1 J21, M69, and M6 J1.

- Highways No mitigation measures or off-site works are shown. Main Street in Willoughby Waterleys is unrealistically proposed as an access route. Alternatives, such as upgrades to Cosby Lane or new links from Peatling Road, must be properly assessed.
- Infrastructure The CFP lacks plans for healthcare, affordable housing, schools, or sustainable transport. No commitment exists for a doctor's surgery or credible public transport strategy.
- Flooding Insufficient assessment of flood risk downstream of Whetstone Brook, where flooding has occurred twice in two years.
- SGP Dependence WPGV remains tied to the obsolete SGP, proposing isolated, car-reliant growth with no coordinated infrastructure delivery.

## 6. Failure Against the Garden Community Toolkit

The CFP fails key Homes England Toolkit tests: it lacks financial and delivery plans, integration with Local Plans, a clear consenting route, credible transport evidence, and stewardship funding. There are no binding design codes, biodiversity or climate strategies, or structured community engagement. Without these, the proposal will be unsound and undeliverable.

#### 7. Viability and Deliverability

Tritax has not disclosed minimum land purchase terms or contribution levels to J20a, meaning viability untested and unproven. This mirrors viability failures that were highlighted in Stretton Hall's Harborough's plan consultation. With uncertain infrastructure costs and no delivery programme, reliance on WPGV will render the BDC Plan unsound. There is also confusion over whether housing could proceed without the logistics element—contrary to Garden Village principles.

#### 8. Conclusion

WPGV proposes 4,500 homes in Blaby and 900 in Harborough—around 18,000 residents—without credible plans for healthcare, transport, public transport or services. Tritax's logistics background and lack of housing experience raise major doubts about deliverability. Without J20a, logistics jobs will not materialise, leaving an unsustainable dormitory settlement. The CFP is speculative, premature, and contrary to national policy.

To be credible, the proposal must demonstrate deliverable funding and approval for J20a, provide costed and phased infrastructure plans, commit to affordable housing, health, and education, deliver viable public transport and flood mitigation, and ensure transparent governance.

As presented, the CFP is unsound, unviable, and contrary to sustainable development principles.