

TACKLEY PARISH COUNCIL – FORMAL REPRESENTATION ON WODC LOCAL PLAN 2043

Objection to Proposed Non-Strategic Allocation: AREA U, Rousham Road, Tackley

Date: 12th December 2025

Tackley Parish Council welcomes the opportunity to comment on the Preferred Spatial Options Consultation (October 2025). Following parish-wide engagement and review of WODC evidence, the Parish Council submits this formal representation objecting to the proposed allocation of approximately 70 dwellings at AREA U (also referred to as TACK003 in the HELAA technical site assessment).

Our objection is detailed below, but in brief the proposal to include Area U is:

- Not justified
- Not effective or deliverable as a site
- Not consistent with national or regional policy
- Not positively prepared in any way to meet the needs of Tackley.

Our objection is grounded in the four Tests of Soundness (NPPF para 35) and supported by evidence gathered through Parish Council public engagement (Oct and Nov 2025), and the Tackley Housing Needs Survey (April 2025) undertaken by Community First Oxfordshire.

1. NOT JUSTIFIED – The allocation is not supported by proportionate evidence

1.1 Housing need in Tackley is modest and small-scale, not 70 dwellings

The Tackley Housing Needs Survey 2025 identifies only 13 households in genuine affordable housing need, and crucially:

- Need is gradually spread across 3–5 years, not immediate
- Need is predominantly for 1–2 bedroom affordable and accessible homes
- Residents supported only a “small number of homes” for those with local connections (57% support)
- No evidence supports a large mixed-tenure estate

A 70-unit allocation is wholly disproportionate to the evidenced need.

1.2 Tackley has already absorbed major recent growth

The two most recent housing developments in Tackley (26 homes at Street Farm completed 2018 and 70 homes at Land East of Nethercote Road completed 2019) have delivered a combined 96 new dwellings within the last 7 years. The 70-dwelling Nethercote Road scheme alone increased the village’s housing stock by approximately 18% in a single development, an unprecedented expansion for a rural settlement of this size.

Allocating a further 70 homes within the same plan cycle would:

- More than double that expansion

- Represent growth far beyond rural policy expectations
- Conflict with the adopted Local Plan 2031 approach requiring proportionate rural growth

1.3 Misclassification as a Large Village

Tackley's designation as a Tier 3 "Large Village" is not supported by transparent criteria. The settlement hierarchy appears to have relied heavily on an arbitrary population threshold of 1,000, despite Tackley only exceeding this figure because of the recent Nethercote Road expansion (c. 26% growth since 2018). Before that, Tackley fell below the threshold. Tackley has very limited services—an hourly train service accessed through residential streets, a small primary school combining year groups, and no shop other than a volunteer-run store—indicating it functions as a small rural village, not a growth location.

1.4 Flawed use of HELAA Sieving Questions

HELAA Appendix 1 highlights that Tackley sits within or adjacent to priority biodiversity areas, including habitats identified in the Oxfordshire Wildlife and Landscape Study (OWLS) such as ancient semi-natural woodland, species-rich hedgerows, unimproved grassland, reedswamp and habitat-rich watercourses. Although sieving questions exclude sites only if they fall "wholly" within protected areas, biodiversity conservation depends on habitat linkages and ecological networks, not isolated site boundaries. A narrow application of sieving tests therefore risks undermining the ecological integrity of the wider landscape and contradicts national nature recovery principles.

Overall, the evidence base used to justify AREA U is incomplete, inconsistently applied, and materially inaccurate. As such, the allocation fails the NPPF test of being justified, and cannot lawfully or soundly be taken forward into the Local Plan.

2. NOT EFFECTIVE – AREA U is not realistically deliverable due to unresolved infrastructure failures

2.1 Wastewater treatment works are non-compliant

WODC's own evidence confirms:

- Sewage treatment works breach permit limits
- Dry-weather discharges already occur
- No committed, funded upgrade exists

Without confirmed infrastructure, the site cannot be delivered within the plan period.

2.2 Drainage and flood risk constraints remain unmitigated

Existing surface water problems would be exacerbated by major development, increasing pollution and localised flood risk. Tackley has a well documented, frequent and destructive village flood challenge that is unresolved. Area U specifically is one of the "sink" areas that protects the

village from incoming run off from the surrounding higher lands. A large bund was recently constructed in AREA U specifically in recognition of this point.

2.3 Transport, access, and safety constraints

Traffic associated with:

- Station access and parking
- School peak times

Across these areas the proposal creates safety issues for pedestrians and cyclists. It is unclear even how these challenges could be addressed given the roads cannot be widened and parking cannot be created in the built up areas.

Because no deliverable infrastructure solutions are identified, the allocation fails the soundness test of effectiveness.

3. NOT CONSISTENT WITH NATIONAL POLICY – Conflicts with NPPF principles on sustainable development, pollution, and rural housing

3.1 Pollution and wastewater (NPPF 153–158)

Allocating housing where the wastewater system is breaching permits is contrary to national policy requiring plans to prevent unacceptable water pollution and plan positively for infrastructure.

3.2 Rural housing policy (NPPF 79–80)

National policy requires rural housing to be:

- Proportionate
- Responsive to local needs
- Environmentally sustainable

A 70-unit estate in a constrained Tier 3 village contradicts these principles.

3.3 Flood risk and climate resilience (NPPF 159–169)

A site with unresolved drainage issues cannot be allocated without robust evidence of mitigated risk; none is provided.

3.4 The proposed development conflicts with emerging Nature Recovery Strategy Priorities

Tackley lies within or immediately adjacent to an identified Nature Recovery Zone, and the newly published Oxfordshire Local Nature Recovery Strategy (LNRS) sets clear expectations for protecting and enhancing habitats in such areas. The allocation of AREA U for housing is therefore inconsistent with national policy requiring plans to secure nature recovery and biodiversity net gain in line with LNRS priorities.

In contrast, the parish is supporting a community-led biodiversity enhancement project for this land, potentially designating it as local green space and delivering multiple LNRS objectives, including:

- Creation of a pond or scrape for carbon sequestration
- Improved public access to nature and community wellbeing
- Habitat for curlew, farmland birds, amphibians (including newts), invertebrates, and wider species recovery
- Corridor habitat for migrating deer

This community-led alternative aligns directly with the LNRS criteria and national policy on nature recovery, whereas a large housing allocation does not. Tackley Parish Council is already exploring support pathways through Wild Oxfordshire and the Trust for Oxfordshire's Environment, whose grant programmes encourage precisely the type of biodiversity initiative suitable for this land.

4. NOT POSITIVELY PREPARED – The strategy ignores more sustainable, better-served locations

The spatial strategy aims to direct growth to:

- Larger, better-connected settlements
- Areas with demonstrated infrastructure capacity
- Locations supporting sustainable transport

Tackley does not meet these criteria. Selecting AREA U contradicts the Council's own spatial principles and undermines the positive preparation test.

5. COMMUNITY CONSULTATION CONFIRMS STRONG OPPOSITION TO LARGE-SCALE GROWTH

The Parish Council's engagement and the Housing Needs Survey show residents:

- Support only small-scale, locally-targeted homes
- Strongly oppose major expansion
- Prioritise resolving infrastructure failures before any growth

Public sentiment aligns with the evidence: AREA U is not an appropriate or supported site.

6. REQUESTED MODIFICATION TO THE LOCAL PLAN

To make the Local Plan sound, Tackley Parish Council requests:

Removal of AREA U (Rousham Road) from the Local Plan 2043.

If any growth is planned in Tackley, it should:

- Be small-scale,

- Directly linked to genuine local housing need,
- Supported by evidence of deliverable infrastructure, and
- Delivered through infill or a small rural exception site, not a large estate.

Conclusion

The inclusion of Tackley AREA U is unsound and is:

- Not justified
- Not effective
- Not consistent with national policy
- and not positively prepared

The Parish Council therefore formally objects to its inclusion.

Contact

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