

Filtered Data Export

**Full name:** Rob Martin

**Organisation (where relevant):** Clyst Honiton Parish Council

**Other party name (if relevant):**

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**Proposal:**

1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:**

Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:**

1.1

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** REGULATION 19  
CONSULTATION – CLYST HONITON PARISH COUNCIL RESPONSE

- Inadequate consultation
- No response from EDDC to date on feedback Clyst Honiton Parish will be affected by the contents of this plan more than any other parish in East Devon as the bulk of the land allocated for the proposed new settlement takes up all of its land between the A30 and the A3052. Clyst Honiton Parish Council (CHPC) has been disappointed that EDDC has not engaged with it any more than through the normal 'consultation' phases despite a number of requests from the parish council to do so. From the outset, CHPC has not objected to the principal of the new settlement being included in the local plan because it recognises the need that EDDC has to make provision for a large number of dwellings with few options about where these can go. CHPC did expect therefore that the district council would engage with it in a positive way so that the mistakes of the past at Cranbrook would not be repeated with this new settlement. This has not happened. In its response to the consultation on the new settlement masterplan proposals, CHPC pointed out a number of matters of concern in relation to its knowledge of the topography of the site and how some of the proposals will not be workable but has received nothing in response. The main aim has been to ensure that this development is driven by sound planning principles driven by planners and the local community, rather than being led by developers given the usual rush to keep up with the build profile. With the one development area providing 10% of the overall total planned for the whole period, failure to get workable and enforceable

masterplans completed in time will seriously compromise the vision for the future. CHPC does understand that this is phase 1 of the Regulation 19 consultation, with more details on the new settlement being introduced at phase 2. There is however concern about the lack of detail included in the plan on this subject, some of which is dealt with below. There are many policies within this draft of the plan which Clyst Honiton Parish Council agrees with, and other policies that will have no direct effect on it. This response deals with those policies that will have a direct effect on the parish of Clyst Honiton.

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**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP01

**3. Do you consider that this part of the Spatial Strategy chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** In relation to Clyst Honiton, it is apparent that it is not to be treated as a Service Village but is still defined as Open Countryside. The main reason this is the case is because it has lost the facilities necessary to make it sustainable as a service village when they closed down with Cranbrook being built (school, community hall, football pitch etc). Being in Open Countryside, however, the plan restricts it from putting any of these things back. The scene being outlined within this plan is that the Cranbrook Treasbeare expansion will continue, all of the Clyst Honiton land between the A30 and the A3052 will become part of the new settlement which will leave just the one part of the village, defined as open countryside. As such, Clyst Honiton becomes squeezed between development on three of it 4 sides with the River Clyst Regional Park on the fourth side. The identity of Clyst Honiton as a viable parish will just disappear, despite having been a village for several hundred years. It is the unique position of Clyst Honiton and its wish to keep its identity that raised the hope that CHPC might be given a special place in the consultations leading up to this point which it has not.

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**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP02

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** With the potential for more than 20,000 homes to be delivered over the plan period, it is essential that the proposals are not over-optimistic. The experience of Cranbrook has shown that new settlements do not deliver dwellings as a constant flow because builders will always build in accordance with what can be sold, which often means shutting down building work at times when the economy slows. For this reason, Inspectors have been reluctant to accept stepped trajectories for housing supply loaded as this one is towards the back end of the plan period. The danger is that, if the initial years fall behind the trajectory, the later years end up having to provide totally undeliverable numbers, even without the new settlement taking longer than anticipated to get going which will also create problems later on. The net effect of this is for the plan to be disregarded when a 5-year housing supply cannot be demonstrated which ends up with the Cranbrook effect of dwellings being built without infrastructure just to get numbers on the ground. The problem is having no 'Plan B' in the early years.

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**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP07

**3. Do you consider that this part of the Spatial Strategy chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** This policy is confusing because it requires the applicants to assess the infrastructure requirements arising from their development. This can be understood for non-strategic sites, but surely it is for the Plan to have assessed the infrastructure necessary for each strategic site? This is particularly the case for the new settlement as the infrastructure required will be more than just the road up to the site, for example.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** The policy needs rewording to identify which proposals it is referring to.

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**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP08

**3. Do you consider that this part of the Spatial Strategy chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:**

- Incomplete – deferring to developers will lead under-provision and overloading of current (already overloaded) infrastructure
- Timelines for infrastructure unclear which will lead to overloading etc
- Highways and sewage already overloaded but not acknowledged

• Third party involvement for education and public transport not demonstrated

Following on from the comment on SP07 above it is not clear which infrastructure provisions will be included here, it just seems to apply to those developments up to a certain size where the thresholds for wider infrastructure work such as main road improvements, sewage provisions etc are not met by the one application. The cumulative effect of all of the developers however exceeds the thresholds. The masterplans for large developments need to have identified what needs to be provided for overall so that appropriate contributions can be obtained from developers from the beginning. In the past, successful provision of infrastructure has been obtained by working with consortia of developers to build out a large site, rather than letting each one get away with not providing enough. Whilst the Local Plan outlines the Housing and Employment allocations and, in each case identifies the infrastructure requirements, this is all done piecemeal. What is missing is a Strategic Plan for Infrastructure delivery to go alongside the other strategic policies in the Local Plan. What is required is the identification of all infrastructure requirements brought about by the delivery of the whole plan and how this is going to be delivered when it is needed, rather than when it is afforded, or not. In the case of just the many strategic allocations, both residential and

commercial, in and around the Clyst Honiton parish boundary the following will need to be provided if sustainability is to be demonstrated:

#### Highway improvements –

- The main improvements relating to Clyst Honiton are laid down in policy TR02 being the alterations to the Clyst St Mary Roundabout which is essential before the New Community development even starts and Improvements to the A30 Airport Junction which is also adjacent to Clyst Honiton Village.
  - There are, however, many other conflict points on the London Road which are going to be needed because of the many commercial developments enabled by other policies in the plan. This highway is already at peak capacity or beyond and will need upgraded junctions and other traffic management facilities to be able to cope with the traffic.
  - The new town being proposed will have an even bigger effect on both the A30 and the A3052 and is only briefly referred to in the narrative relating to this. The effect on both highways is going to be significant. Not everyone in the new town will work in East Devon, a good proportion will be working in Exeter and the traffic here will increase significantly adding to the delays experienced already. People will not be cycling from the new town to Exeter in large scale, no matter the aspirations in the Local Plan.
  - The assumption in the Local Plan with regard to EVs is that people will need infrastructure to charge the vehicles, but will not use them to get to work, plainly not the case. Assuming EVs are a good thing, they will still need highway to be able to use them.
- #### Sewage Disposal
- The only reference to provisions for additional sewage treatment facilities is in the allocation of land for treatment site on the new town site. This is unlikely to be provided at the front end of the development and could have to wait until the after the end of the plan period in 2042. Twenty years is too long to wait for improvements to the already under-strain infrastructure currently in place.
  - The plan has a total of 5,000+ dwellings allocated in this plan, with a further 5,000 likely in the next plan in the Clyst Honiton area, alongside a number of employment and commercial allocations with sewage all heading in the same direction, through an inadequate pumping station in Clyst Honiton, on the River Clyst which already discharges into the river hundreds of times a year.
  - All parishes on the River Clyst from Broadclyst to the Exe at Topsham will have similar tales to tell about this. In short, it will make a mockery of the Clyst Regional Park aspirations.

- Sewage Disposal Facilities have to be improved in the short term otherwise the whole area is going to be compromised. Including the need for as part of the Local Plan is absolutely essential, which will require a commitment from South West Water to provide it. Education
- The level of housing in one area will impact on education provision and it is important to consider this from the outset.
- With large scale development there will be a need for additional primary and secondary education and with evolving government policies pre-school as well. The difficulty is that these provisions will need to be in place at the outset rather than waiting until the development takes place. The number of extra children resulting from development comes with a demand at all age levels, rather than starting at the youngest and building up, so there is often not an identified demand for extra places as development take place. With a potential build period on the new town site of more than 10 years, the eventual need for both primary and secondary provision should not be left until the houses are all built.
- This is a situation where the provision needs to be in place before it is needed, with school populations filling at the end of development. There is a danger that each new tranche of pupils end up being absorbed within the current schools, meaning the student population having to travel to school, which is not sustainable.
- There is a need to get information from Devon County Council on a plan to deliver the school provision required. Transport Options
- There is an assumption that public transport will be available for the large developments, but the new town, unlike Cranbrook, has no easy access to the rail network.
- The only form of public transport available to get to and from the site is that of many more bus services and the assumption here is that this will be provided by the bus companies in the free market.
- This is an assumption that will not come to fruition without potential substantial subsidy to the bus companies, particularly initially. A plan needs to be drawn up with the bus companies to make sure the services are there from the outset. Once people get used to using their car (EVs is the plan) they will not go back to buses.
- It should be remembered that transport is not just for people going to work, but young people have to get to school and particularly to Exeter College so they have a daily need for a consistent provision. Medical Services
- A particular problem with large new communities is whether there is going to be an accessible doctors surgery, again from the outset, rather than looking 20 year in advance.

- In addition, the increased call on hospital services has to be accommodated which is a problem if the highways are gridlocked with ambulances unable to get through the traffic.
- Maybe, there should be provision in the plan for an Air Ambulance landing site to ensure that badly injured people, perhaps as a result of an accident on over capacity highways, can get to hospital in good time.

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**Proposal:**

4. Development at the West End

**1. To which part of the Development at the West End chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS02

**3. Do you consider that this part of the Development at the West End chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:**

- A repeat of the failed Science Park (which has been unable to repay its loan to EDDC?) and Sky Park requirements for specific use – any lessons learnt? This policy allows most types of development, except for stand-alone large scale warehousing and distribution. It allows warehousing and distribution site as a limited part of a mixed-use development and requires the sites to deliver high value employment. The problem is that none of the above defines ‘large scale’ or ‘high value’ There is also the requirement to connect to the district heating schemes based at Sky Park and Monkerton – are these working well enough to take more connections?

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**Proposal:**

4. Development at the West End

**1. To which part of the Development at the West End chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS05

**3. Do you consider that this part of the Development at the West End chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:**

- Refusal to acknowledge airport location should prevent further development – cake and eat it This policy determines that growth and expansion of the airport operation will be supported within its current operational boundaries. This almost seems to be an oxymoron since its either one or the other. Beyond airport operational boundaries noise sensitive development within the 57db noise contour around the airport will be restricted. From the NDO point of view, the applicable noise contours need to be determined and agreed and not have out of date information as the base line.

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**Proposal:**

4. Development at the West End

**1. To which part of the Development at the West End chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS06

**3. Do you consider that this part of the Development at the West End chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:**

- Incomplete This policy relates to the land lying either side of Long Lane and relates to a mixed-use business park. The development land will need to come forward as an agreed (with whom?) masterplan to take account of infrastructure (undefined), archaeology, flood risk, etc etc. The effect of this Masterplan will be felt widely and the parish council should be consulted on the details it contains.

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**Proposal:**

4. Development at the West End

**1. To which part of the Development at the West End chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS07

**3. Do you consider that this part of the Development at the West End chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:**

- Infrastructure not explained Another bit of Clyst Honiton land being allocated for employment. The local roads are going to be inundated with traffic which does not flow currently and there needs to be a set of highways schemes laid down that will enable these developments without completely gridlocking the network. Its Ok having housing and employment allocations spread around the area with each having to contribute their bit, but this will not produce the finance for the major schemes that will be necessary to cope with all the new demands on top of the current ones.

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**Proposal:**

4. Development at the West End

**1. To which part of the Development at the West End chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS08

**3. Do you consider that this part of the Development at the West End chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:**

- Is this robust? Allocation site for small business units – NDO element The requirement here is to have private sewage/drainage measures. Given huge amount of development close by, this could be challenged.

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**Proposal:**

4. Development at the West End

**1. To which part of the Development at the West End chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS09

**3. Do you consider that this part of the Development at the West End chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:**

- Ignores annual increase in flooding and current sewage problems The aim of this policy is laudable and talks about needing to contribute to the development of the plan for the park but does not address the issue that will affect it most – sewage outflows. Without a completely new approach to the provision of the sewage treatment works the CVRP will be an open cesspit as the infrastructure continues to fail.

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**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD01

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:** This policy says that Clyst Honiton could have a farm shop, not possible given the proposal to build over the farm land in the parish. This could be a real problem and would effectively prevent a community shop being set up to avoid isolation in a village surrounded by commercial and housing development.

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**Proposal:**

6. Mitigating Climate Change

**1. To which part of the Mitigating Climate Change chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:**

6.1

**3. Do you consider that this part of the Mitigating Climate Change chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Mitigating Climate Change chapter, please use this box to set out your comments.:** The policies contained in this chapter are very welcome and to a great extent reflect those within the Clyst Honiton Neighborhood Plan, but they need to be enforced.

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**Proposal:**

7. Adapting to Climate Change

**1. To which part of the Adapting to Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR01

**3. Do you consider that this part of the Adapting to Climate Change chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Adapting to Climate Change chapter, please use this box to set out your comments.:**

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**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:**

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**3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** Strategic Policies AR01 relates to Flooding and the criteria to fulfil if development takes place. The only missing part is the statement that a general rule of thumb that building on a flood plain will be resisted except for: All the AR01 policy elements.

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**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN01

**3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:**  
No

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:**

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**3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** Most of this policy is fairly standard, but there should be a sub-division of A. to require the provision, within the 'affordable housing' requirement of a certain number of 'social' housing because the 80% rental level is still too high for those on low incomes. It is easy to forget that the servicing of the many businesses around the area will require low-paid staff as well as those on high pay. The result is often that those with low wages cannot afford to live near new developments and therefore have to travel from somewhere else.

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**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN02

**3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:**  
No

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:** There is a concern, brought on by the experience of other local plans, that despite all the good words in the policy there will not be enough affordable housing provided because developers will get out of their commitments by claiming that they are not viable. This is the hole down which the provision of affordables has never been delivered by any district council anywhere, as the viability argument is a game of smoke and mirrors.

The worry is that the new community requirement should be at least that of normal developments, on the basis that the economies of scale brought about by the larger allocation should mitigate the cost of cost of not selling for the market price.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** The provision of a required number of affordable and social housing on a site should be an absolute requirement not something that is seen by developers as something they can avoid. If the scheme is not viable with affordables, the land is not worth what the developers paid for it. A simple fact.

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**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN03

**3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:**  
No

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:** There is a conflict with this well-meaning policy for the provision of care homes (C2) or older people dwellings (C3) in that there is no requirement for these to be affordable. The majority of new care homes are for the top end price bracket where local people cannot afford to go. The difference in care home prices range from £800 to £2,000 per week with the state offer only being accommodated in those at the lower end of the scale. There is a genuine need for some of the affordable provision to be provided in the care home (C2) category. Conversely, there is also a need for open-market housing for older people wanting to down-size from a 4-bed property to (say) a 2-bed one, meaning that the need is for more small properties than just those for first-time buyers.

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**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN05

**3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:**  
No

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:** The need for the plots to be part of the affordable allocation is confusing, the wording of the clauses on larger sites relates to plots without clear guidance that it means Self-build plots particularly. If self-build plots are defined as affordable, what happens when the first owners want to move on? Are they retained as part of the affordable stock?

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**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN08

**3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:**  
No

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:** The provision of new shops etc in Clyst Honiton is not supported as it is excluded from the tier 4 villages. This seems unfair and self-defeating, particularly as it had most of the services until Cranbrook came along. The people of Clyst Honiton, particularly those who are less mobile are in danger of being completely without services, even if there was an opportunity to provide them.