

Committee	-	Licensing & General Purposes
Date	-	16 November 2006
Report of the	-	Director of Resources
Subject	-	Review of Parishing Arrangements in Icklesham Parish

Recommendation: That the Committee consider the outcome of the Parish Review conducted of the Icklesham Parish Council area and determine whether or not recommendations for change to parish arrangements should be made.

Head of Service: Trevor Elliott

Background

1. At its meeting on 23 March 2006 the Committee considered my report on the proposal which had been made for a new Winchelsea Parish Council to be created out of the existing Icklesham Parish Council. The impetus for this had come from a number of residents of Winchelsea who believed that the Parish of Icklesham had become too large and too diverse for the existing Parish Council to adequately represent the particular interests of any of the four Wards which make up the Parish Council (Icklesham, Rye Harbour, Winchelsea & Winchelsea Beach) and that Winchelsea in particular was losing out.
2. The Committee agreed that it was appropriate for a review to be conducted of parish arrangements in the Icklesham Parish area and that this should be progressed by way of a survey to be sent to all households in the Parish, as well as public notice given in the local press and on public noticeboards, website publicity and by direct communication to Parish Councils and other main organisations in the area.
3. The Committee noted the four statutorily prescribed steps of the review process:
 - Stage 1 Publication of review and invitation of representations
 - Stage 2 Consideration of the representations, the outcome of which would determine whether subsequent steps were undertaken
 - Stage 3 If the Council were minded to make recommendations for change, publication of its draft recommendations and consultation on them

Stage 4 Consideration of representations and submission to the Secretary of State and the Electoral Commission of any recommendations for change

4. The Committee further noted that in making an assessment of the need for new or changed parish arrangements, it was required to have regard to the need (a) to reflect the identities and interests of local communities and (b) to secure effective and convenient local government.

The Review

5. The review formally commenced on 16 June with the publication of notice in the Rye Observer, on local noticeboards in Icklesham Parish and on the District Council's website (Appendix A). Adjoining Parish Councils were also requested to display the notice on Parish and other noticeboards throughout their Parish to help secure that all those who might be interested in the review were informed of it and of the opportunity to make representations.
6. Formal invitations to submit representations were sent to Icklesham Parish Council and the adjoining Parish Councils (Brede, Camber, Guestling, Pett, Rye and Udimore), East Sussex County Council, the Member of Parliament for the Hastings & Rye Constituency, the two Members for the Rye & Eastern Rother Electoral Division and the Brede Valley & Marsham Electoral Division of East Sussex County Council, the eight Members for the Eastern Rother, Brede Valley, Marsham and Rye Electoral Wards of Rother District Council and to organisations and bodies which had been identified in Icklesham Parish.
7. The cornerstone of the review was, however, the survey (Appendix B) which was sent to all households in Icklesham Parish, backed up by publicity on the District Council's website and in the local press. A covering letter to all households also enclosed a plan (Appendix C, which showed the present Icklesham Parish Council area, its division into the four separate Parish Wards, and the Parish/Town Councils which adjoin Icklesham Parish), together with a reply paid envelope. The letter further advised the availability on a pick-up basis of Key Questions about the review and the considerations attaching thereto (Appendix D). These were deposited at the District Council Community Help Point in Rye and the Winchelsea Community Office, as well as being posted on the District Council's website.
8. The Committee's decision to proceed by way of a household survey was based primarily on:
 - the enhanced penetration which the survey would produce, compared with a referendum or poll which would have excluded those not on the electoral roll; and
 - the ability for the survey to drill down into views as to what, if any, arrangements might appropriately be made for the parishing of the residual areas of the Parish, compared with a referendum or poll which could do little more than ask the headline question as to whether separate Parish Council status was supported.

9. Whilst the broad procedure for undertaking a parish review is prescribed by statute (paragraph 3 above), the actual process of notification is left to the District Council's discretion to decide what is sufficient to achieve the duty to secure that all those who may be interested in the review are informed of the decision to conduct it, of its subject matter and of the period within which representations about the review may be made.
10. I am fully satisfied that the Council's decision to conduct a household survey was the appropriate one in all the circumstances and that it more than discharged the statutory duty upon the Council, drilling down in a way that a referendum or poll would have been incapable of doing. Certainly the Electoral Commission has confirmed that the Council approached the review on an appropriate basis, as has the Sussex Association of Local Councils. The survey as framed sought to elicit views both about the parishing of Winchelsea and also the residual arrangements for the parishing of the other three Wards of Icklesham Parish (Icklesham Ward, Rye Harbour Ward & Winchelsea Beach Ward). It was designed so that individual Ward analysis could be undertaken to enable the strength of support for the various possibilities to be tested.
11. The headline question asked in the survey was:

Do you think that Winchelsea Ward of Icklesham Parish Council should be established as a Parish in its own right and have its own Parish Council?

Because of the District Council's need to be satisfied as to the appropriateness of revised arrangements for the remainder of Icklesham Parish, in the event that it was minded to recommend separate Parish Council status for Winchelsea, respondents' views were then requested (even if they had answered the headline question in the negative) on one of the three possible arrangements for the remainder of the Parish:

Do you think that the three remaining Wards of Icklesham Parish Council (Icklesham, Rye Harbour, Winchelsea Beach) should form a single Parish with its own Parish Council?

or

Do you think that any of the three remaining Wards of Icklesham should be established as Parishes in their own right and have their own Parish Council?

(If so, respondents were asked to indicate which Ward(s) they thought should be separately parished)

or

Do you think that any of the three remaining Wards of Icklesham Parish Council should combine with any other adjoining Parish?

(If so, respondents were asked to indicate which Ward(s) they thought should combine with which other Parish)

12. The survey also provided opportunity for the general expression of views and in recognition of the wish by some Winchelsea residents for the survey to speak to the number of persons in the household whose views were represented by the survey response, a question to this effect was also included in the form.
13. A period of ten weeks was set for responses to the survey and the expression of views which were therefore required to be returned to the Council by 25 August.

Request for a Parish Poll

14. Despite the agreement given to include within the survey a mechanism to identify the number of persons in the household whose views were being submitted, it was apparent that there was continuing dissatisfaction on the part of some Winchelsea residents to the adoption of the household survey as the cornerstone of the review process, and it was their belief that the review should instead be conducted on the basis of a referendum or poll of registered electors in each Parish Ward.
15. Invoking powers contained in the Local Government Act 1972, six electors of the Parish convened a Parish Meeting, the stated purpose of which was to consider a motion proposing that a referendum of the whole Parish be held on the question "Do you wish your Ward to become a separate Parish?". The notice convening the Parish Meeting further stated that the referendum was being called "in order to ensure that the electors of Icklesham, Rye Harbour, Winchelsea & Winchelsea Beach are democratically and transparently consulted about their wishes for the structure of local government at parish level".
16. The medium for this is technically a Parish Poll and with the carrying of the motion, a poll was taken by the District Returning Officer on 27 July between the statutorily prescribed hours of 4pm and 9pm. The outcome of the poll is referred to later in this report. Though not binding in law, the information provided by the poll should be considered alongside the survey data and other representations received.

Relevant Considerations

17. As this report was being prepared, the Government published a White Paper on local government reform which included broad proposals for further emparishment. Unless and until the Government gives effect to the White Paper proposals by legislation, the relevant legal considerations are as previously noted by the Committee, namely, that the Council in making its assessment of the need for new or changed parish arrangements, must observe statutory requirements to have regard to the need to reflect the identities and interests of local communities and to secure effective and convenient local government (Section 22 of the Local Government & Rating Act 1997). It must also have regard to advice which has been given by the

Secretary of State on the establishment of new Parishes & Parish Councils, and on arrangements for making changes to established Parishes & Parish Councils (Environment Circular 11/97 issued by the former Department of the Environment, Transport & the Regions).

18. It is noted from Electoral Commission Circular EC13/2006 that the Department for Communities & Local Government and the Electoral Commission are in the process of producing joint guidance for local authorities in England on the establishment and review of parishes. This will replace Circular 11/97. The Commission has already made available its section of the guidance, but this relates to parish electoral arrangements only. At the time of preparing this report, the joint guidance has yet to be published and the review has therefore been undertaken against the background of the guidance in Circular 11/97, as set down in Appendix C of my report to the Committee on 23 March 2006.

Current Structure of Icklesham Parish Council

19. In common with four other Parish & Town Councils in Rother District (Ashburnham & Penhurst, Battle, Ticehurst & Westfield), Icklesham Parish Council is divided into Parish Wards, each comprising a distinct settlement as follows:

Icklesham

Icklesham is situated on the A259 between Hastings and Rye. Much of the village consists of estates of smaller houses and bungalows, located north of the main road, and there is little residential development south of this road. The village is reasonably well provided with shops and social facilities. The population is currently estimated to be 933.

Rye Harbour

Rye Harbour is situated on the south bank of the River Rother, about 1½ miles south-east of Rye and one mile upstream from the river mouth. There is a residential core to the village, but there is an extensive industrial area fronting the road from Rye, and a large holiday caravan site just south of the village. The river also provides anchorage for a number of yachts and small boats and a wharf lends the village a minor function as a commercial port. Because the village is approached by a single minor road from Rye, it is consequently comparatively isolated. The population of the village is currently estimated to be 470.

Winchelsea

Winchelsea is situated on the A259 between Hastings and Rye. It is laid out on a grid-iron pattern and was built as a bastide town in medieval times – that is a squared plan with an irregular boundary. It is residential in character, but attracts visitors and tourists because of its architectural merit and historical interest, the town itself being designated as a Conservation Area. The village is reasonable well provided with local facilities. Its population is currently estimated to be 518.

Winchelsea Beach

Winchelsea Beach is situated on the coast between the mouth of the River Rother and the Fairlight Cliffs, and about 2½ miles south of Rye. It is an informal modern holiday settlement with a low resident population (currently estimated to be 791) proportionate to its population in the summer months. Many of the holidaymakers are accommodated in the large caravan sites at the southern end of the village. The village is approached along a minor road from the A259 at Winchelsea (about 1 mile to the north-west) and accessibility is therefore not good. A minor road also connects the village to Pett Level.

20. Each Parish Ward elects a prescribed number of Councillors to the Council. Set out below are electorate, Councillor, area and estimated population details for each of the four Parish Wards:

Ward	Electorate	Councillors	Area (ha)	Estimated Population
Icklesham	765	4	588	933
Rye Harbour	289	2	326	470
Winchelsea	410	3	792	518
Winchelsea Beach	654	4	646	791
Total	2,118	13	2,352	2,712

21. In terms of area, Icklesham Parish is the fifth largest of the 31 Parishes in Rother District, exceeded by Battle, Burwash, Ewhurst and Ticehurst.
22. In terms of total electorate, Icklesham Parish is the fourth largest in the District, exceeded by Battle, Rye and Ticehurst. The electorate of the largest of its four Parish Wards (Icklesham Ward) is in excess of 14 of the 31 Parish & Town Councils in the District, and the electorate of the smallest of its Parish Wards (Rye Harbour) is still in excess of seven of them.
23. At the last whole Parish elections held in May 2003, the number of candidates for each Ward matched or exceeded the available seats. Previous elections had, however, failed to secure sufficient nominations for all the available seats:

Ward	Seats	May 2003	May 1999	May 1995
Icklesham	4	4	2	4
Rye Harbour	2	3	2	1
Winchelsea	3	3	5	2
Winchelsea Beach	4	4	4	4

Household Survey

24. A total of 1,487 survey forms were despatched to households throughout Icklesham Parish and the response rate was as follows:

Ward	Forms Sent	Number of Respondent Households	Response Rate
Icklesham	491	196	40%

Rye Harbour	225	52	23%
Winchelsea	288	142	49%
Winchelsea Beach	483	206	43%
Total	1,487	596	40%

25. The headline results of the household survey were as follows:

Do you think that Winchelsea Ward of Icklesham Parish Council should be established as a Parish in its own right? (Question 1)

Ward	Yes		No		Total Response
Icklesham	16	(8%)	180	(92%)	196
Rye Harbour	1	(2%)	51	(98%)	52
Winchelsea	79	(56%)	63	(44%)	142
Winchelsea Beach	27	(13%)	179	(87%)	206
Total	123	(21%)	473	(79%)	596

26. Regardless of whether they had answered Question 1 in the affirmative or negative, respondents were further asked to express their preference for the revised arrangements to apply for the remainder of Icklesham Parish, should the District Council be minded to consider the separate parishing of Winchelsea Ward, the three possible arrangements being:

Question 2 - The three remaining Wards of Icklesham Parish Council (Icklesham, Rye Harbour and Winchelsea Beach) forming a single Parish with its own Council

Question 3 - Any of the three remaining Wards of Icklesham Parish Council being established as Parishes in their own right and having their own Parish Council

Question 4 - Any of the three remaining Wards of Icklesham Parish combining with any other adjoining Parish

27. A significant number of respondents declined to express a preference altogether and some expressed a multiple preference. As such, there is not an exact correlation with the headline results in paragraph 25. The headline results of the household survey to Questions 2, 3 & 4 were as follows:

Ward	Question 2	Question 3	Question 4	No Opinion	Total
Icklesham	114	27	13	42	196
Rye Harbour	34	7	5	11	57
Winchelsea	48	35	20	40	143
Winchelsea Beach	117	26	11	52	206
Total	313	95	49	145	602

28. The results set out in the preceding tables represent numbers of households. Respondents were requested to state the number of persons (18+) in their household whose views were represented by their survey return. Although

not all respondents did so, the aggregate number of those who did state the number of 18+ year olds was 1,069. This compares with the 864 people who participated in the Parish Poll referred to at paragraphs 39 to 41 below. The following table shows for each Ward the number of 18+ year olds by reference to the headline question:

Ward	Yes	No	Total
Icklesham	27	324	351
Rye Harbour	2	81	83
Winchelsea	153	122	275
Winchelsea Beach	44	316	360
Total	226	843	1,069

29. Whether individual household responses or the aggregate number of 18+ year olds that the households represented are used, the results mirror each other. 79% of households said "No" as did the number of 18+ year olds stated to be represented by the survey returns. In Winchelsea ward, 56% of households said "Yes" as did the number of 18+ year olds stated to be represented.
30. Not all respondents expressed general comments in response to the invitation to do so. Of those who did, the main themes were:

For the separate parishing of Winchelsea Ward

- Unique history and character of Winchelsea as a town and Cinque Port with differing needs from adjoining villages
- Would give inhabitants a greater interest in a separate Council dealing with its own particular needs, interests and problems
- Status quo not working; all four Wards together have become very unwieldy; Icklesham Parish Council too large and cumbersome to be effective
- Distinct identity from Icklesham Parish Council as a whole and that of the other three Wards
- Present Council undemocratic – more than one half its Members are co-opted and one Ward can be outvoted by the other Wards on issues that do not concern them
- Winchelsea's particular needs and interests not currently well served by Icklesham Parish Council and would be better supported by a Winchelsea Parish Council
- Icklesham Parish Council unique in having four similarly sized, well sized and well defined villages, each with different priorities to consider
- Would be financially viable

Against the separate parishing of Winchelsea Ward

- Existing Parish as a whole is wholly against separation, as demonstrated by the Poll, and the clear feeling of the majority should be respected

- The combined four Ward Parish Council has served the community well, the four Wards together being a greater force than a small individual Ward standing alone
- Considerable costs in separating Winchelsea Ward from Icklesham Parish Council would far outweigh any possible benefits
- Winchelsea is the centre of the Parish connecting the other villages of the Parish & having strong ties and links with them which residents wish to maintain
- Could undermine the Winchelsea Corporation
- The current Parish Council is evenly balanced
- Present arrangements have worked well for a long time for the benefit of the residents of all four Ward
- No good reason seen why present arrangements should change; why fix something that is not broken
- Waste of time and money
- Would incur extra cost for everyone and will not benefit any Ward; the community would be weaker for it
- The four villages are a contiguous entity and any separation would reduce administrative effectiveness

31. Summarising the Results of the Household Survey

- There was an emphatic overall rejection (by 79% to 21%) of the separate parishing of Winchelsea Ward
- Of the four Parish Wards, Winchelsea Ward alone expressed support for its separate parishing but not emphatically so (by 56% to 44%)
- In terms of their views on possible residual parishing arrangements which all survey respondents were asked to give, whether or not they had answered yes or no to the headline question:
 - Nearly one quarter (145) of respondents declined or felt able to state a preference for residual parishing arrangements, should the District Council be minded to consider the separate parishing of Winchelsea
 - Of the respondents (457) who did state a preference, a majority (313) favoured the coming together of Icklesham, Rye Harbour & Winchelsea Beach Wards as a single Parish (Question 2)
 - The separate parishing of Icklesham, Rye Harbour & Winchelsea Beach Wards (Question 3) or their combining with adjoining Parishes (Question 4) were both poorly supported

Other Consultees

32. Formal invitations to submit representations were sent to those persons and local authorities referred to in paragraph 6 of this report, and to identified organisations and bodies in Icklesham Parish.
33. Of the local authorities consulted, the only response received was that of Icklesham Parish Council. After consultation throughout the whole Parish, the Parish Council gave it as its opinion that there was no need to change the present structure and that it wished to see the status quo maintained and to continue to serve and act in the best interests of the whole Parish (Appendix

- E). No responses were received from the surrounding Parish and Town Councils.
34. The Member of Parliament for Hastings & Rye expressed his awareness of a large scale petition for a separate Parish for Winchelsea but did not think it right to offer an opinion on what he considered to be essentially an issue for local parishioners. He did however suggest that as the current Corporation elects a Mayor under their ancient rights, this could lead to confusion, and if there were widespread support for a separate local government unit, one option might be to see whether this could be incorporated within the existing Winchelsea Corporation structure.
 35. Of the County & District Councillors consulted, one response was received from the Head of Democratic Services of East Sussex County Council on behalf of the two local County Councillors, who reported their view that the proposal went against Government locality policy and that the demands being placed on parishes put a premium on larger Councils and the resources that go with that. They did not consider that Winchelsea would benefit from being separated from its neighbours.
 36. Of the 87 organisations and bodies consulted, responses were received from 33. Of these, 11 supported the separate parishing of Winchelsea and 22 were opposed to it.
 37. Of the organisations and bodies in support, detailed submissions were received from the Winchelsea Archaeological Society (which suggested three possible combinations for the parishing of the remainder of Icklesham Parish), and from the Winchelsea Town Plan Steering Committee, Winchelsea Neighbourhood Watch, Winchelsea Bonfire Boyes, Winchelsea Speed Watch, the Winchelsea Community Office and the Parish of Winchelsea Action Group (all of which suggested the separate parishing of Icklesham Ward, but made no suggestion for revised arrangements for Rye Harbour & Winchelsea Beach Wards). The submission of the Parish of Winchelsea Action Group was particularly comprehensive in setting down the key points in support of separate Parish Council status for Winchelsea, encompassed the range of views by other supporting respondents and is therefore reproduced in full (Appendix F). Copies of these and all other responses received have been deposited for inspection in the Members' Room at the Town Hall.
 38. Of the organisations and bodies opposed to the separate parishing of Winchelsea, 13 of them selected as their preferred option the joining together of Icklesham, Rye Harbour and Winchelsea Beach Wards as a single Parish, in the event that separate Parish Council status for Winchelsea were to be pursued; one selected the separate parishing of Icklesham Ward but expressed no view with respect to Rye Harbour and Winchelsea Beach Wards, two selected the combination of one or more Parish Wards with adjoining Parishes, and six expressed no view at all.

Parish Poll

39. The Parish Poll was conducted under the Parish & Community Meetings (Polls) Rules 1987 which state that when the result of the poll has been

ascertained, the Returning Officer shall forthwith declare the number of votes for and against the question and whether the question to which the poll relates has been carried or not. Although the count of each of the Wards was undertaken separately, the aggregate result is the one which must be given as the final result, and the outcome of this was therefore as follows:

Do you wish your Ward to become a separate Parish?

Yes	147	(17.01%)
No	716	(82.87%)
Rejected	1	

The question was therefore not carried.

40. As the count of the Wards was undertaken separately, the indicative result by Parish Ward can be given as follows:

Ward	Electorate	Votes For (Yes)	Votes Against (No)	Majority For (+) / Against (-)	Rejected Ballot Papers	Turnout %
Icklesham	765	10	314	-304		42.35
Rye Harbour	289	2	105	-103		37.02
Winchelsea	410	126	69	+57	1	47.80
Winchelsea Beach	654	9	228	-219		36.24
Total	2,118	147	716	-569	1	40.79

41. Summarising the results of the Parish Poll:

- There was an emphatic overall rejection (by 83% to 17%) of the question put, thus mirroring the overall result of the household survey (79% to 21%)
- Winchelsea Ward alone supported the question; 64% of voters did so as against 56% of Winchelsea households who responded to the survey; however the turnout of the parish poll at 196 was much smaller than the 275 persons (18+) in Winchelsea whose views were stated to be represented by the survey returns
- There was an emphatic rejection of the question in the other three Wards

Petition

42. In support of their wish to see the separate parishing of Winchelsea and as a measure of the breadth of support for it, the Parish of Winchelsea Action Group submitted a copy of a petition containing the signatures of 228 registered electors. In submitting the petition, the Action Group stated that although the Parish Poll also provided a measure of support for the proposal – almost two to one in favour in Winchelsea Ward – the petition was considered

to be superior in as much as it was compiled over a period of time, whereas the Poll excluded those not present in Winchelsea on the day.

43. The copy of the petition as submitted to the Council is addressed to the Deputy Prime Minister (as the predecessor to the Secretary of State for Communities & Local Government to whose Department the function has since transferred) and purports to be in pursuance of Section 11 of the Local Government & Rating Act 1997. By Section 11 of this Act, a proposal for the creation of a parish may be presented to the relevant Secretary of State, via the District Council, in the form of a petition from electors in the area of the proposed parish. Such a petition must be signed by not less than 250 or 10% of local government electors in the area concerned, whichever is the greater. On receipt of a valid petition, the District Council must within three months of its receipt forward it to the Secretary of State together with the Council's views on the petition.
44. The power in Section 11 extends, however, only to the creation of new parishes and not to reviews of existing parish boundaries (ie, the area in question must not be already wholly or partly within a parish) and to this extent the petition has no legal standing. Nevertheless, the petition as submitted is a further indication of views within Winchelsea Ward of Icklesham Parish Council and it is right and proper that appropriate account should also be taken of this expression of support for the Ward's separate parishing. The copy of the petition has been deposited for inspection in the Members' Room at the Town Hall.

Summary

45. With the completion of Stages 1 & 2 of the review, it is now for the District Council to decide whether or not it is minded to make recommendations to the Secretary of State for Communities & Local Government for changed parish arrangements. If the District Council is so minded, then it would need to publish its draft recommendations for change and consult on them, following consideration of which it would decide whether or not to make final recommendations for change to the Secretary of State. If it is not so minded, then this would mark an end to the review and in this event it would be appropriate to give notice of this, although statute does not impose any formal obligation to do so.
46. Before it could make any recommendations to the Secretary of State for revised parishing arrangements, the District Council would need to be satisfied as to the arrangements to be recommended to the Secretary of State not only for the parishing of Winchelsea Ward but also for that of the residual Wards of Icklesham, Rye Harbour & Winchelsea Beach since the former cannot be considered in isolation. In making its assessment of these, the District Council must have regard to whether the recommended arrangements could reflect small, distinctive and recognisable communities of interest with their own sense of identity and also whether effective and convenient local government could be secured.
47. In determining whether the District Council feels sufficiently satisfied in order to make recommendations to the Secretary of State, both for the creation of a

new Parish Council of Winchelsea and for the parish arrangements for the residual Wards of the existing Icklesham Parish Council, it must weigh up the quality of arguments put forward as well as the strength of support and opposition evidenced generally by the representations it received, and specifically by the responses to the household survey.

48. Strong arguments have been expressed for and against the separate parishing of Winchelsea Ward. Were it not already part of a parished area, its separate parishing would undoubtedly reflect a small, distinctive and recognisable community of interest with its own sense of identity and it is also likely that effective and convenient local government would thereby be secured. As part of an existing parished area though, the District Council cannot look at Winchelsea Ward in isolation but must consider any revised arrangements across the entirety of the parished area. Amongst the considerations to which the District Council needs to have regard are Winchelsea's long-standing inclusion in the parished area, its location at the heart of that area, the support for the status quo by Icklesham Parish Council and by a substantial majority of people living within the existing Parish, the support within Winchelsea Ward for separate parish status and whether or not a realistic alternative structure could be implemented for the parishing of the residual Wards of Icklesham, Rye Harbour and Winchelsea Beach. It is for Members now to balance the household survey data, the result of the parish poll, the petition, the arguments put forward both for and against the separate parishing of Winchelsea and all other material before them in this report and by reference to the statutory criteria determine whether or not further action should be taken on progressing revised parish arrangements in Icklesham Parish.

Joy Cooper
Director of Resources

Risk Assessment Statement

A decision not to have conducted a review of parish arrangements in the Icklesham area would not have been challengeable other than by way of judicial review in the Courts. Likewise, a decision not to take any further action following the review undertaken to date.