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Submission to consultation on *Proposals for local government reorganisation in Surrey*

I am making this submission to the consultation on *Proposals for local government reorganisation in Surrey* on behalf of the Association of British Counties (ABC), an unincorporated association which promotes the importance of the 92 historic counties of the UK to our nation's heritage and culture. We are delighted that the Government shares our view of the importance of the historic counties to our history, geography and sense of community and identity^[1].

ABC considers that the main threat to the identities of the historic counties is their confusion with local government. Hence, although ABC has no views on the structures of local government, we firmly believe that administrative terminology and administrative area names should be chosen so as to draw a clear distinction between administration and the historic counties. Given these concerns, our submission relates solely to Questions 6 and 9.

Question 6: Has the proposal been informed by local views, and does it consider issues of local identity and cultural and historic importance?

ABC considers that neither of the two proposed unitary local government set-ups presented by the consultation document adequately considers issues of local identity and cultural and historic importance, in so far as the proposed names for the new unitary councils do not properly reflect the historic county identities of the areas concerned.

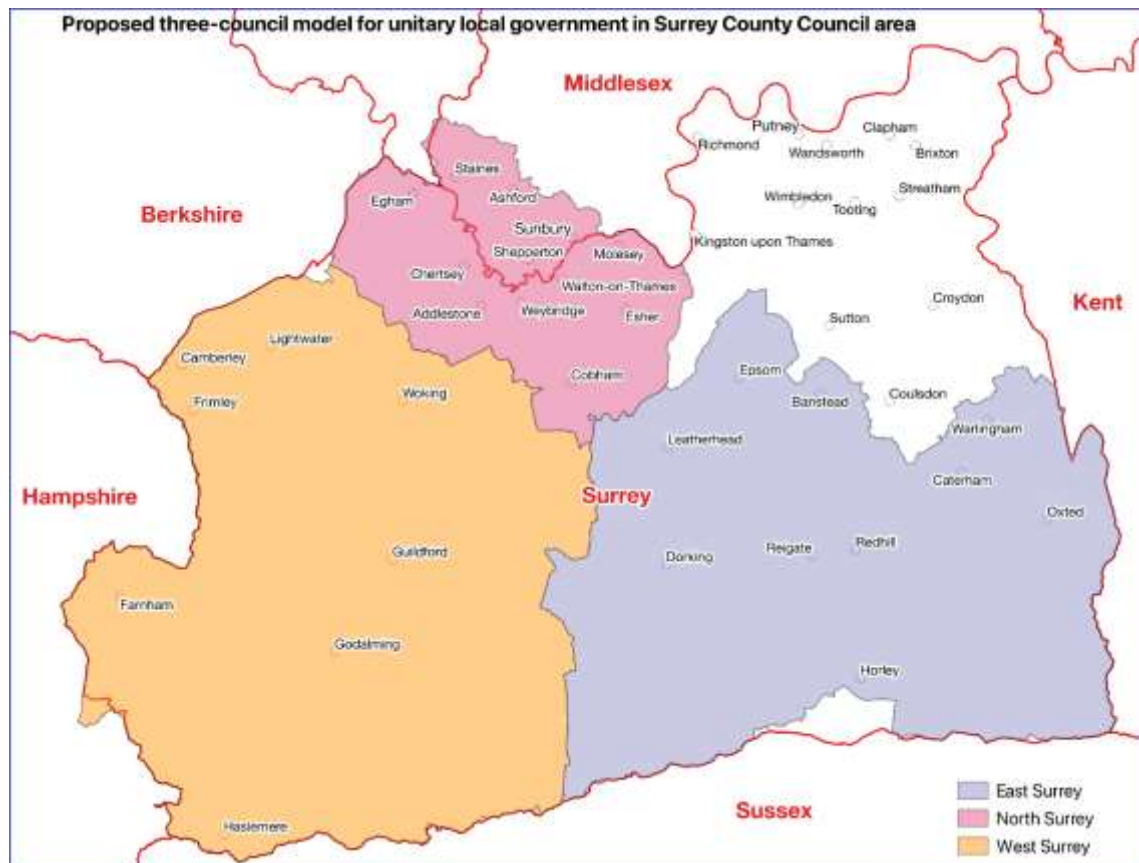
The use of the unqualified name 'Surrey' to describe the current Surrey County Council area has long been a source of confusion and irritation since this area (a) excludes the metropolitan part of the historic county of Surrey; (b) includes a significant area north of the Thames which lies in the historic county of Middlesex.

The London Government Act 1963 placed most of Middlesex within "Greater London" for the administrative purposes of that act. However, around 60% of the ancient hundred of Spelthorne (specifically the *Staines* and *Sunbury-on-Thames* urban districts) was made part of the administrative county of 'Surrey'.

The Local Government Act 1972 formed the borough of *Spelthorne* from the part of Middlesex in the Surrey County Council area. The use of the ancient name *Spelthorne* did at least do something to reflect the Middlesex identity of the area. Despite sixty years of confusion, the Middlesex identity of Spelthorne remains strong.

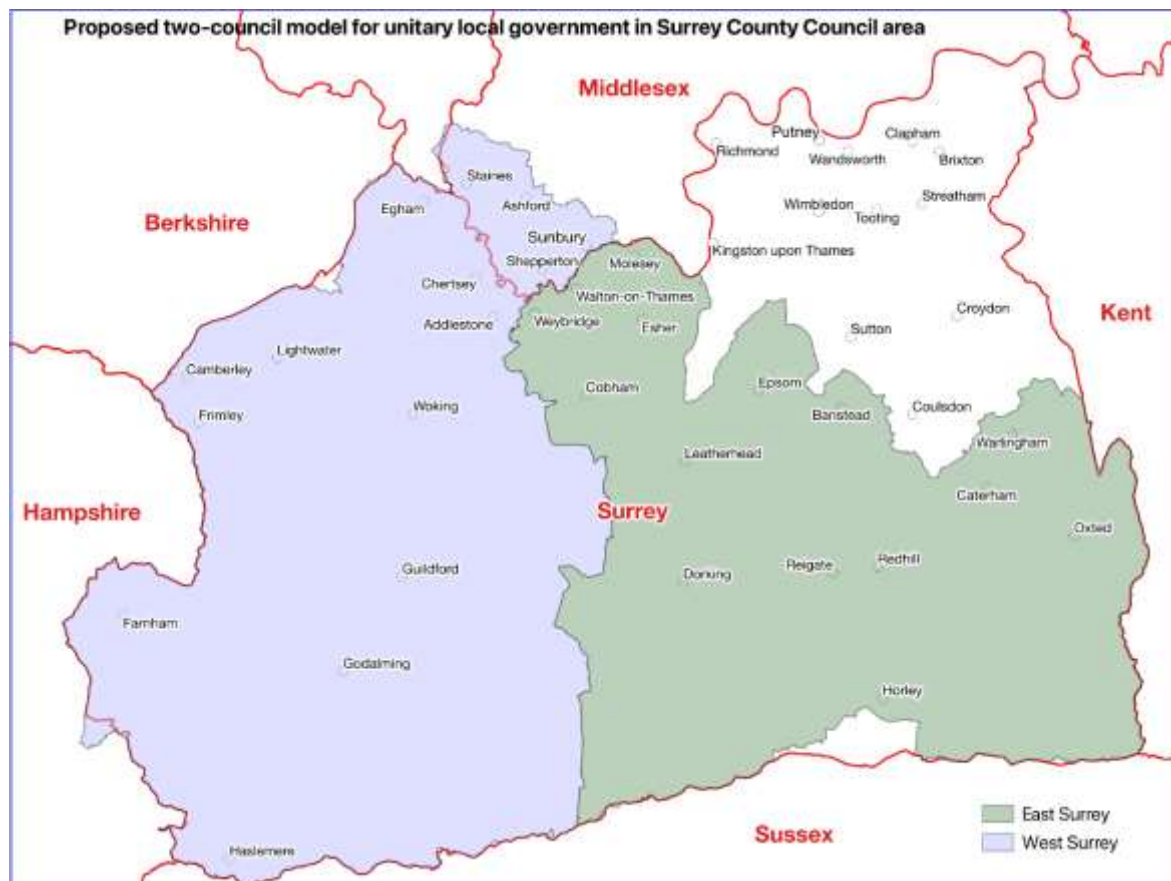
This local government reorganisation provides a great opportunity for the Middlesex identity of Spelthorne to be brought to the fore. Unfortunately, neither of the proposals does this. As they stand, they would see the name *Spelthorne*, with its Middlesex associations, cease to be used within local government. It is vital, therefore, that the successor unitary authority within which this area lies is named to reflect the area's Middlesex heritage and identity.

In relation to the 3-council proposal, the map compares the councils to the historic counties:



- ABC has no issues with the names 'East Surrey' or 'West Surrey';
- ABC objects to the name 'North Surrey'. Around one-quarter of this proposed council area would lie in the historic county of Middlesex, as would one-third of its population. The council name must reflect this. A name such as 'Middlesex-Surrey Borders', 'North Surrey and Middlesex Thameside' or 'North Surrey and Spelthorne' would be appropriate.

In relation to the 2-council proposal, the map compares the councils to the historic counties:



- ABC has no issues with the name ‘*East Surrey*’;
- ABC objects to the name ‘*West Surrey*’ being used for an area which includes the Spelthorne area of Middlesex. A name along the lines of ‘*West Surrey and South West Middlesex*’ or ‘*West Surrey and Spelthorne*’ would be appropriate.

Question 9: Do you have any other comments with regards to the proposed local government reorganisation in Surrey?

In establishing unitary councils, the Government should take the opportunity to give local government an identity totally distinct from the historic counties by replacing the terms ‘*county*’ and ‘*county council*’ within local government legislation, terminology and parlance with ‘*council area*’ and ‘*council*’, as used in Scotland. Unitary council names should take the form ‘*East Surrey Council*’, ‘*Middlesex-Surrey Borders Council*’ etc.

Clearing the confusion with local government could be backed up by two further measures to strengthen official recognition for the importance of the historic counties:

- Including a definition of ‘*historic county*’ within the Interpretation Act 1978 would ensure the consistent use of the historic counties across Government, its agencies and within the heritage sector. The definition used by the Office for National Statistics is ideal^[2,3].
- Appointing the lieutenancies of England^[4] to the historic counties, as are many lieutenancies in Scotland^[5] (e.g. Banffshire, Caithness, Dunbartonshire, Kincardineshire, Sutherland), would be a suitable official recognition of the importance of both the historic counties and the office of lord lieutenant. This would see the lord-lieutenant of Surrey serving the historic county of Surrey and the creation of a lord-lieutenant of Middlesex.

Our *Historic Counties of the United Kingdom Bill*^[6] details the small legislative changes which would be necessary to implement these measures.

Many thanks for giving us the opportunity to express our views on the ongoing local government reorganisation. We trust that you will give these views your due consideration.

Yours sincerely

Peter Boyce

Peter Boyce
Chairman, Association of British Counties

NOTES

[1] Ministry of Housing, Communities and Local Government, 2019, *Celebrating the historic counties of England*

<https://www.gov.uk/government/publications/celebrating-the-historic-counties-of-england/celebrating-the-historic-counties-of-england>

[2] Office for National Statistics, 2024, *Index of Place Names in Great Britain*

<https://geoportal.statistics.gov.uk/datasets/208d9884575647c29f0dd5a1184e711a/about>

[3] Historic Counties Trust, 2022, *Historic Counties Standard*,

https://www.historiccountiestrust.co.uk/Historic_Counties_Standard.pdf

[4] Association of British Counties, 2022, The lieutenancies of England and their relation to the historic counties

https://gazetteer.org.uk/ABC_Fact_Sheet_Lieutenancy_Areas_England.pdf

[5] Association of British Counties, 2022, The lieutenancies of Scotland and their relation to the historic counties

https://gazetteer.org.uk/ABC_Fact_Sheet_Lieutenancy_Areas_Scotland.pdf

[6] Association of British Counties, 2025, *Historic Counties of the United Kingdom Bill*

https://gazetteer.org.uk/ABC_Historic_Counties_of_the_UK_Bill.pdf