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The Rt Hon Angela Rayner MP  
Secretary of State for Housing, Communities and Local Government  
2 Marsham Street  
LONDON  
SW1P 4DP

Dear Ms. Rayner,

**Re: English Devolution White Paper and the historic counties**

The Association of British Counties exists to celebrate the 92 historic counties of the UK, highlighting their importance to our heritage, culture and sense of community. We have been delighted with the Government's support for our historic counties in recent years, especially through its *Celebrating the Historic Counties of England*<sup>[1]</sup> guidance and its coordination of the wonderful display of county flags in Parliament Square for Historic County Flags Day each July.

I write now as we believe that the English Devolution White Paper offers the Government an opportunity to tackle the main threat to the identities of the historic counties: their confusion with local government. In establishing unitary councils, the Government should 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.
- Ensuring that none of the new unitary councils or Strategic Authorities bears an unqualified historic county name unless the council/authority is close in area to that historic county.

Local government was closely based on the historic counties from its creation in 1889 until the 1960s. After numerous changes since then, local government is now radically different to the historic counties, yet 'county' and 'county council' are still used in local government. Some councils still use a historic county name despite having a radically different area to that historic county (e.g. *Cambridgeshire County Council*, *Lancashire County Council*, *Oxfordshire County Council*). The resulting confusion has, over 60 years, totally undermined our historic counties.

Unless this opportunity is taken to unambiguously separate local government from the historic counties, then the historic counties can have no long-term future in the national life.

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<sup>[2]</sup>:

- Including a definition of 'historic county' within the Interpretation Act 1978. This 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<sup>[3,4]</sup>.
- Appointing the lieutenancies of England to the historic counties<sup>[5]</sup>, as are many lieutenancies in Scotland<sup>[6]</sup> (e.g. Banffshire, Caithness, Dunbartonshire, Kincardineshire, Sutherland).

We would be pleased to meet with you to discuss these suggestions further.

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

[https://gazetteer.org.uk/ABC\\_Historic\\_Counties\\_of\\_the\\_UK\\_Bill.pdf](https://gazetteer.org.uk/ABC_Historic_Counties_of_the_UK_Bill.pdf)

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

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

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

[https://www.historiccountiestrust.co.uk/Historic\\_Counties\\_Standard.pdf](https://www.historiccountiestrust.co.uk/Historic_Counties_Standard.pdf)

[5] 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](https://gazetteer.org.uk/ABC_Fact_Sheet_Lieutenancy_Areas_England.pdf)

[6] 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](https://gazetteer.org.uk/ABC_Fact_Sheet_Lieutenancy_Areas_Scotland.pdf)

### Index of Place Names in Great Britain (IPN) 2024 User Guide v 1.0

#### Historic County Name

*Field Name:* CTYHISTNM

Name of the historic county in which the place is situated.

The historic counties of Great Britain (also known as ancient counties, counties proper, geographical counties or traditional counties) have existed largely unchanged since the Middle Ages. Their original administrative function became the responsibility of separate administrative counties and county councils set up by the Local Government Act 1888 and the Local Government (Scotland) Act 1889. It was these administrative counties and county councils that were abolished in England and Wales in 1974 by the Local Government Act 1972, and in Scotland in 1975 by the Local Government (Scotland) Act 1973, not the historic counties.

While no longer a statistical geography, the historic counties are now included in the IPN for those users who wish to use them for historic, traditional, or cultural purposes. They are recommended as a stable, unchanging geography which covers the whole of Great Britain.

The boundaries of the historic counties used here are those defined in Definition A of the Historic Counties Standard published by the Historic Counties Trust, whereby detached parts of counties are not separately identified, but are associated with their host county.

Office for National Statistics - from *Index of Place Names in Great Britain (IPN) 2024 User Guide*