

26th March 2026

LGR Consultation
Ministry of Housing, Communities and Local Government
2 Marsham Street
London
lgrconsultationresponse@communities.gov.uk

Submission to *Proposals for local government reorganisation in Gloucestershire*

I am making this submission to the consultation on *Proposals for local government reorganisation in Gloucestershire* 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^[1]. Our response addresses Item 4(d) of the consultation’s *Criteria for unitary local government*: “*Proposals should consider issues of local identity and cultural and historic importance.*”

The main threat to the identities of the historic counties is their confusion with local government. The current Gloucestershire County Council area exemplifies this problem.



Gloucestershire County Council area compared to the historic county

Gloucestershire County Council does not cover a large area in the populous south of the county - an area which includes Chipping Sodbury, Thornbury and the northern side of Bristol. The existence of *South Gloucestershire Council* makes the unqualified use of 'Gloucestershire' even more bizarre. The identity of the historic county is undermined by the resulting confusion.

There are four measures the Government should take to end this problem of "county confusion" and draw a clear distinction between local government and the historic counties:

- The terms 'county' and 'county council' within local government legislation, terminology and parlance should be replaced with 'council area' and 'council', as used in Scotland;
- Council names should take the form "*West Gloucestershire Council*", i.e. not "county council";
- Councils should only make use of a historic county name if that provides the best description of the location and area of that council, and then with appropriate qualification, e.g. as in "*Central Bedfordshire Council*", "*West Northamptonshire Council*" etc;
- The office of lord-lieutenant should be appointed to the historic counties throughout England.

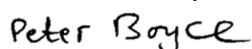
Responding to the specific *proposals in the consultation*:

- The first option proposes the current Gloucestershire County Council area be the basis for a new unitary council. Such a council should not bear the unqualified name "*Gloucestershire Council*". "*North and West Gloucestershire Council*" would be more geographically accurate;
- The second option's "*East Gloucestershire Council*" and "*West Gloucestershire Council*" are sensible council names.
- The third option proposes a "*Gloucestershire Council*" even less like the real county than proposed by the first option. "*North and West Gloucestershire Council*" would be better.
- The 'Gloucestershire' lieutenancy covers the combined areas of *Gloucestershire County Council* and *South Gloucestershire Council*. It should be fully aligned with the historic county.

We are proposing that the lieutenancies be returned to the historic counties throughout England^[2], as many lieutenancies already are in Scotland^[3]. This would be a suitable official recognition of the importance of both the historic counties and the office of lord lieutenant.

Finally, 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^[4,5]. Our *Historic Counties of the United Kingdom Bill*^[6] details the small legislative changes which would be necessary to implement these measures.

Yours sincerely



Peter Boyce
Chairman, Association of British Counties

[1] MHCLG, 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, 2022, *The lieutenancies of England and their relation to the historic counties*

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

[3] 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

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

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

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

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