

26<sup>th</sup> 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 Lincolnshire, North Lincolnshire and North East Lincolnshire***

I am making this submission to the consultation on *Proposals for local government reorganisation in Lincolnshire, North Lincolnshire and North East Lincolnshire* 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<sup>[1]</sup>. 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 Lincolnshire County Council area exemplifies this problem.



Lincolnshire County Council area compared to the historic county

*Lincolnshire County Council* does not cover a large area in the populous north of the Lincolnshire. The existence of *North East Lincolnshire* and *North Lincolnshire* councils in this area makes the unqualified use of ‘*Lincolnshire*’ even more bizarre. The identity and sense of community of the historic county is obscured and 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 “*Southern Lincolnshire 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 third option proposes that the current *Lincolnshire County Council* area be the basis for a new unitary council. Any such council should be called “*Southern Lincolnshire Council*”;
- The other options propose reasonable, qualified use of the ‘*Lincolnshire*’ name, though the “*Unitary Authority 1*” and “*Unitary Authority 2*” of the fourth option require sensible names.

The ‘*Lincolnshire*’ lieutenancy is already closely aligned with the historic county. If this can be done in Lincolnshire, then it can clearly be done for each historic county in England.

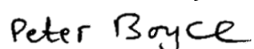
Hence, we are proposing that the lieutenancies be returned to the historic counties throughout England<sup>[2]</sup>, as many lieutenancies already are in Scotland<sup>[3]</sup>. This would be a suitable official recognition of the importance of both the historic counties and the office of lord lieutenant.

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<sup>[4,5]</sup>.

Our *Historic Counties of the United Kingdom Bill*<sup>[6]</sup> details the small legislative changes which would be necessary to implement these last two measures.

Many thanks for giving us the opportunity to express our views on this reorganisation.

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](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](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](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](https://gazetteer.org.uk/ABC_Historic_Counties_of_the_UK_Bill.pdf)