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Submission to *Proposals for local government reorganisation in Warwickshire*

I am making this submission to the consultation on *Proposals for local government reorganisation in Warwickshire* 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 - an importance the Government recognises and itself promotes^[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 Warwickshire County Council and ‘*Warwickshire*’ lieutenancy areas exemplify this problem.



The Warwickshire, Worcestershire and West Midlands lieutenancy areas compared to the historic counties

The proud Warwickshire towns and cities of Birmingham, Coventry, Solihull and Sutton Coldfield are not part of the current administrative areas which borrow the name 'Warwickshire'. The identity and sense of community of the historic county is obscured and undermined.

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 "North Warwickshire 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 for local government reorganisation in Warwickshire*:

- If there is to be a single unitary council, we would prefer this not to bear the unqualified name "Warwickshire Council". Naming such an oddly shaped council area is challenging, but "South and East Warwickshire Council" would be more geographically accurate;
- If there are to be two unitary councils then we have no issue with these bearing the names "North Warwickshire Council" and "South Warwickshire Council";
- The 'Warwickshire' lieutenancy should return to being based on the historic county.

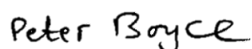
We are proposing that the lieutenancies be returned to the historic counties throughout England^[2], as many lieutenancies already are in Scotland^[3]. This would be a suitable official recognition of the importance of both the historic counties and the office of lord lieutenant.

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 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

[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