



## BRIEFING PAPER

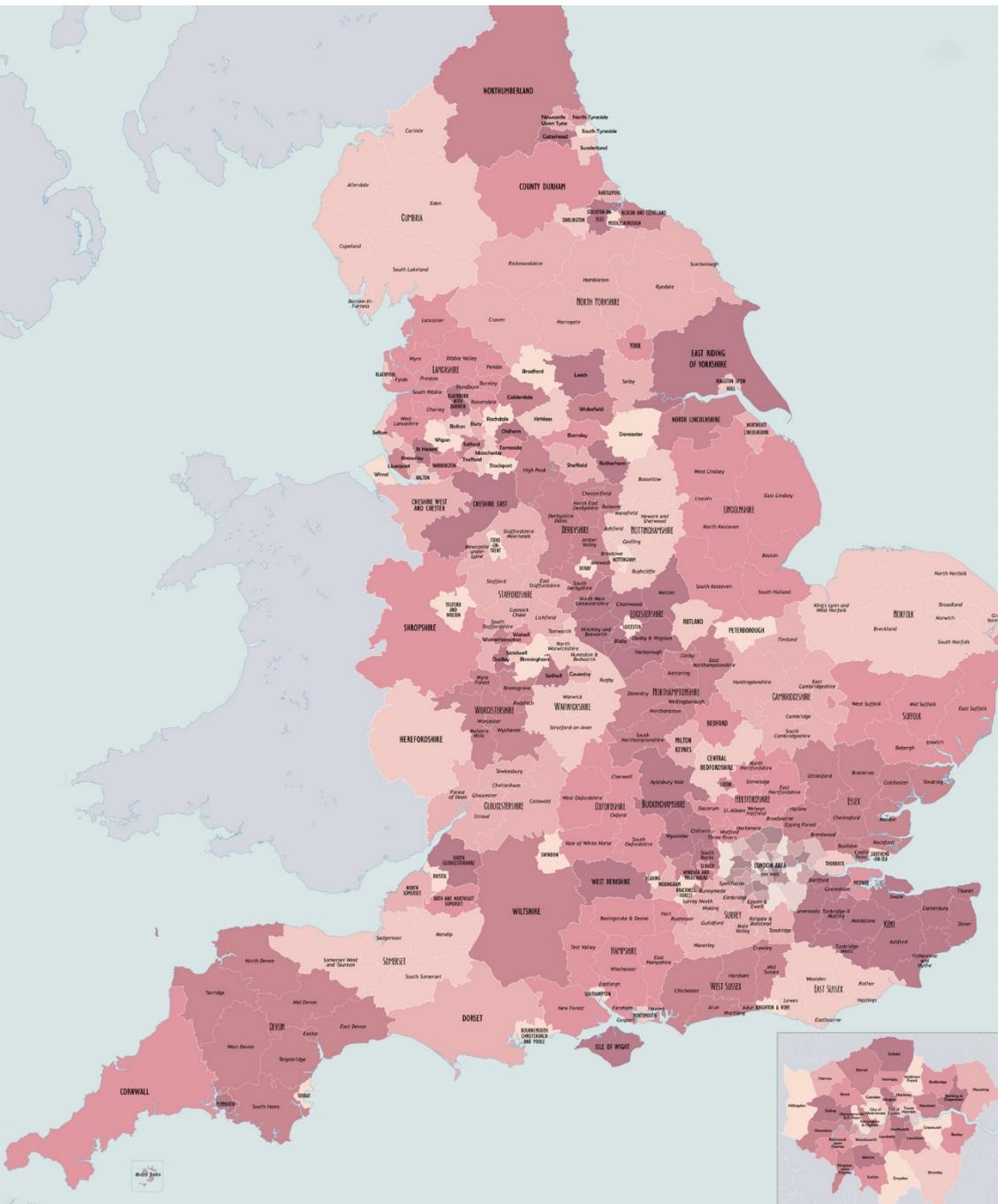
Number 08619, 12 July 2019

# Where do you draw the line? Local administrative boundaries in England

By Mark Sandford

### Contents:

1. Local government and the boundary question
2. Local government boundaries in England: history
3. Functional economic market areas (FEMAs)
4. Place-shaping
5. Why does place-shaping matter now?



# Contents

<b>Summary</b>	<b>3</b>
<b>1. Local government and the boundary question</b>	<b>4</b>
<b>2. Local government boundaries in England: history</b>	<b>5</b>
2.1 Historical practice	5
2.2 Developments in the 20 <sup>th</sup> century	6
2.3 The Redcliffe-Maud Commission	7
2.4 The <i>Local Government Act 1972</i>	9
2.5 Restructuring since 1974	9
2.6 The broader influence of the 1974 reforms	12
<b>3. Functional economic market areas (FEMAs)</b>	<b>14</b>
3.1 The concept of functional areas	14
3.2 FEMAs in policy-making	14
3.3 Different forms of functional areas	16
Travel to Work Areas (TTWAs)	16
Housing market areas	16
Supply chains / economic flows	17
Leisure market areas / service market areas	17
3.4 The limits of FEMAs	18
<b>4. Place-shaping</b>	<b>20</b>
4.1 Introduction	20
4.2 What is place-shaping?	20
4.3 Where is 'place'?	22
4.4 Coterminal boundaries	23
4.5 Affective identity	24
4.6 Scale	26
<b>5. Why does place-shaping matter now?</b>	<b>28</b>
5.1 Greater autonomy in decision-making for local institutions	28
5.2 Local growth	30
Local Industrial Strategies	31
Pan-regional initiatives	32
5.3 Local commissioning of public services	32
Silos and joining-up: previous policies	34
5.4 Increased local accountability	34
5.5 Future changes	36

## Summary

This report addresses current and previous practice in England in the construction of the geographical boundaries of local authorities and local administrative areas.

This issue has been an underlying concern in a number of current policy debates in England during the 2010s. These include the Government's policies of 'devolution deals' and promotion of local economic growth via Local Industrial Strategies. More perennial concerns, to join up the commissioning and delivery of public services at a local level and to increase the quality of local accountability, have also generated some references to the question of boundaries.

The detail of these policies normally features some version of the concept of 'place-shaping': the idea that local authorities hold a general responsibility for the economic, social and environmental well-being of their areas. However, few attempts have been made to demarcate the precise 'places' that are to be 'shaped' by these reforms.

The report sets out the history of local authority boundary changes in England, and the criteria that have shaped them. It also describes the origin and uses of 'functional economic areas', which have had a peripheral impact on English administrative boundaries. It then describes 'place-shaping', and sets out a number of criteria that contribute to conceptions of where 'places' are and how their boundaries should be determined. Finally, it identifies points in recent debates on the governance of England where the question of administrative boundaries arises.

A future report will compare previous practice in determining administrative boundaries in parts of England, via a series of maps.

# 1. Local government and the boundary question

This report addresses current and previous practice in England in the construction of the geographical boundaries of local authorities and local administrative areas.

This issue has been an underlying concern in a number of current policy debates in England during the 2010s. These include the Government's policies of 'devolution deals' and promotion of local economic growth via Local Industrial Strategies. More perennial concerns, to join up the commissioning and delivery of public services at a local level and to increase the quality of local accountability, have also generated some references to the question of boundaries.

The detail of these policies normally features some version of the concept of 'place-shaping': the idea that local authorities hold a general responsibility for the economic, social and environmental well-being of their areas. However, few attempts have been made to demarcate the precise 'places' that are to be 'shaped' by these reforms.

Likewise, in recent decades, comprehensive 'maps' of proposed local administrative areas in England have been relatively few in number. This may reflect the political conflicts generated by past attempts at comprehensive reform, such as the Redcliffe-Maud Commission in 1969 and the subsequent reforms of the *Local Government Act 1972*; the partial reforms of the 1992-95 Local Government Commission; and the abortive attempts to establish regional assemblies in the early 2000s.

This report provides a historical summary of the practice of drawing local authority and administrative boundaries in England. It then identifies the current policy debates that pose questions of local geography and territory. These include debates over devolution; local economic growth; public service reform; and improved local accountability. However, questions of geography are often tacit, or addressed in a perfunctory manner within broader documents, and they have not achieved a high profile. Calls for comprehensive reform of local administrative (or political) boundaries are rare at present.

Local government is devolved to Scotland, Wales and Northern Ireland, each of which has a devolved administration, and a single tier of local government. This paper focuses solely on developments in England.

## 2. Local government boundaries in England: history

This section describes the historical development of local authority boundaries in England. These have been subject to regular change throughout the last 100 years, driven by a variety of rationales. No enduring approach can be identified to determining where local boundaries run. Historically, comprehensive reforms have been the exception to the rule.

### 2.1 Historical practice

Today's local authority boundaries in England are based in large part on decisions made during the major restructuring brought about by the *Local Government Act 1972*. This Act created a two-tier local government structure throughout England, the boundaries of which took some account of traditional county areas; created new administrative units based on large urban areas; and acknowledged concerns about the appropriate scale for local government functions. Most of the administrative boundaries used by public bodies in England today either follow, or relate to, the boundaries of the principal local authorities (county and district councils) that were established at this time.

The names of many local authorities in existence in England today have strong historical associations. Many city and borough councils trace their origins to royal charters granted several hundred years ago. Many county council names, and their areas, have a pedigree lasting several hundred years, arising from the areas covered by Quarter Sessions. These bodies administered justice and a scattering of administrative functions from the 15<sup>th</sup> century through to the end of the 19<sup>th</sup>. This is not to say, though, that the boundaries between them have remained identical for that period of time. Today's county council boundaries have undergone many minor adjustments over time.

Many district council names derive from extensive mergers of smaller district councils in 1972-74 (see section 2.4 below). Some are based on cities or large towns; others on names of familiar rural areas (e.g. Forest of Dean, Fylde, New Forest). Still others are 'neutral' names, deriving from geographical features or from 'compass points' (e.g. South Norfolk, East Northamptonshire).<sup>1</sup>

However, the history of English public administration reveals many different patterns of local boundaries. V.D. Lipman's *Local Government Areas 1834-1945* records the vast number of overlapping boundaries, exclaves and other anomalies, in existence in local administration in 1834. Numerous counties and boroughs controlled 'outlying' territories, sometimes very distant, via historical claims.<sup>2</sup> Most of these anomalies

---

<sup>1</sup> See Colin Copus, Mark Roberts and Rachel Wall, *Local Government in England: Centralisation, Autonomy and Control*, 2018, p102-105.

<sup>2</sup> V.D. Lipman, *Local Government Areas 1834-1945*, 1949, pp67-8

were quietly tidied up during the mid-19<sup>th</sup> century, but were then overlaid by new local administrative geographies, introduced by Parliament (e.g. highway districts, poor law unions, health boards, sanitary authorities, school boards).

The boundaries of these new bodies were frequently based on administrative convenience or local particularism: they did not reflect (nor did they break) a consensus about the appropriate divisions between local areas. Disagreement over boundaries and areas is not a recent phenomenon in England. When elected multi-purpose local authorities were introduced in the late 19<sup>th</sup> century, there was little consensus over local boundaries, and disputes and struggles were routine. Arthur Balfour MP, introducing the London Government Bill in 1899, said:

I am well aware that there is probably no more ticklish question to be dealt with in this Bill than this question of areas. It invariably arouses jealousies, feelings, local passions and local rivalries in a way which has proved very embarrassing to every government which has endeavoured to deal with the complexity of our existing local areas and which has, I am afraid, stood in the way of many important and useful reforms.<sup>3</sup>

The Local Government Acts of 1888 and 1894 introduced a comprehensive pattern of county councils, and district and parish councils, respectively. Part of the purpose of this reform was to reduce overlapping authorities and powers to levy local rates, and to simplify local administration by creating multi-purpose local authorities.<sup>4</sup> The 1888 Act also created 61 'county boroughs', large or historically significant urban areas falling outside county council administration. This represented a compromise between competing perspectives on the appropriate shape of local administration.

### 2.2 Developments in the 20<sup>th</sup> century

The first half of the 20<sup>th</sup> century saw incremental change in local government geographies in England. This was principally driven by local initiatives, responding to urbanisation and economic change. The 1888 and 1894 Acts permitted the expansion of county boroughs on application to the Government, and application for county borough status from towns with a population over 50,000. 23 new county boroughs had been created by 1922. This triggered claims from county councils that some such areas had insufficient populations to run county borough services, and that removing them from county council jurisdiction damaged the county's own service provision.<sup>5</sup> This is an early appearance of debates over public service efficiency, which have come to prominence in more recent decades. Fewer new county boroughs were created in the 1920s and 1930s, but existing ones frequently incorporated further territory on an ad hoc basis, often in response to urban growth. Lipman states:

---

<sup>3</sup> Arthur Balfour, HC Deb 23 Feb 1899 c356

<sup>4</sup> V.D. Lipman, *Local Government Areas 1834-1945*, 1949, pp79-80

<sup>5</sup> *Ibid.*, p175

Some county boroughs had their boundaries extended two or three times in so short a period as ten years. The changes were in no sense comprehensive ... the problem of the relation of the area as a whole to its urban centre was not settled. No solution was sought for the whole question of the relation of county to county borough. The changes made were essentially local and even opportunistic...<sup>6</sup>

Incremental reform continued under the Onslow Royal Commission (1929-45), the Trustram Eve Local Boundary Commission (1945-49) and the Hancock Commission (1958-67). The second of these did not complete any reviews, being abolished in 1949 following some adverse reactions in local authorities.<sup>7</sup> Hancock proposed a series of incremental reforms to county borough boundaries, including mergers: but these frequently became bogged down in legal challenges based on local disagreements.<sup>8</sup>

Pressure increased during the mid-20<sup>th</sup> century for a comprehensive redesign or restructure of local government in England. Proponents of reform were not concerned only with local authority areas, but with the functions, finance, and effectiveness of local authorities. Rationales included population change, changes in the patterns of economic activity (including wider patterns of travel), and a belief in economies of scale.<sup>9</sup> There was also a concern to end the divide between urban and rural administration, with a consensus that such areas were interdependent and better administered by a single authority.

A harbinger of the comprehensive approach can be seen in the 1958 Herbert Commission, which made extensive proposals for the government of London, proposing a new Greater London Council encompassing parts of Surrey, Kent, Essex and Hertfordshire, with 52 London boroughs beneath it.<sup>10</sup> Following the *London Government Act 1963*, in 1964 a Greater London Council (covering a smaller area than the Herbert proposals), and 32 London boroughs (covering larger populations on average than the Herbert proposals), were elected for the first time.

## 2.3 The Redcliffe-Maud Commission

A comprehensive plan for restructuring of local government in England and Wales (not including London) was produced by the *Royal Commission on Local Government in England* (also known as the Redcliffe-Maud Commission) in 1969. This Commission addressed questions of functions, finance and effectiveness as well as the question of local government areas. It is unique in English history in addressing this breadth of issues simultaneously. It also produced a comprehensive series of maps, comparing the existing geographical pattern of authorities with a proposed new pattern. Its recommendations for

---

<sup>6</sup> Ibid., p187

<sup>7</sup> Clifford Pearce, *Machinery of Change in Local Government*, 1980, p69-70

<sup>8</sup> See Ken Young, Brian Gosschalk and Warren Hatter, *In search of community identity*, MORI, 1996, p3

<sup>9</sup> See, for instance, W. Robson, *The Development of Local Government*, 1931

<sup>10</sup> Royal Commission on Local Government in Greater London [Herbert Commission], Cmnd 1164, 1960

restructuring should be read in the context of its recommendations on the functions and finance of local government.

The Commission addressed perceptions that many local authorities were too small (in terms of population) to provide specialist public services; that their boundaries did not reflect recent patterns of urbanisation; and that there were too many types of local authority.<sup>11</sup> It sought to create new local authorities based on:

- “the pattern of living”, including population distribution and travel patterns;
- Optimal population size: the Commission’s report argued that “many local authorities are too small, in size and revenue, and in consequence too short of highly qualified manpower and technical equipment, to be able to do their work as well as it could and should be done”;<sup>12</sup>
- “Democracy and efficiency”: essentially, this meant ensuring that authorities were ‘small enough’ for councillors to “comprehend the problems of the area, determining priorities and taking decisions on policy in full understanding of the issue at stake”;<sup>13</sup>
- Ensuring that “the new local government pattern should so far as practicable stem from the existing one. .. the common interests, traditions and loyalties inherent in the present pattern...should be respected”.<sup>14</sup>

The Commission proposed a new pattern of local authorities based on a balance between the demands of efficiency, scale, economic patterns and affective identities. Its report recommended 58 upper-tier local authorities covering populations of between 250,000 and 1 million, with three two-tier areas surrounding Birmingham, Liverpool and Manchester. Many of the areas proposed - though not all - were based on unfamiliar boundaries. Some of the proposed areas resembled ‘city-regions’, consisting of a city that acted (or was perceived to act) as a focal point for work, leisure and economic activity for its ‘hinterland’.

One member of the Commission, Derek Senior, produced a dissenting report recommending the creation of 35 city regions and 148 districts. His map of recommendations for areas placed greater weight than the main report on patterns of economic activity and less on traditional units, believing that local authorities should be based on “the potential service and commuting hinterlands of a major centre for the functions associated with planning, transportation and development”.<sup>15</sup>

---

<sup>11</sup> Royal Commission on Local Government in England 1966-69 [the Redcliffe-Maud Report], Cm 4040, volume 1, 1969, p23. Types of authority at the time included county boroughs, municipal boroughs, urban district councils and rural district councils

<sup>12</sup> Ibid., p3

<sup>13</sup> Ibid., para 273

<sup>14</sup> Ibid., p5

<sup>15</sup> Ibid., volume 3, p20

## 2.4 The *Local Government Act 1972*

A full-scale reform was implemented via the *Local Government Act 1972*, taking effect from 1 April 1974. However, the 1972 Act's provisions differed considerably from the Redcliffe-Maud recommendations. It created a uniform two-tier structure across England and Wales. Most traditional English county boundaries were retained. Six new metropolitan counties were created, covering major urban areas.<sup>16</sup> Some smaller traditional county areas were merged, and some new counties created in acknowledgement of patterns of economic activity.<sup>17</sup> The Greater London Council area was not changed.

A lower tier of district councils was also created. These covered larger populations, on average, than their predecessors. District councils in metropolitan county areas had more functions than their counterparts elsewhere. Some of the district councils in the new structure were former county boroughs which had lost responsibilities 'upwards' to the reformed county councils.

## 2.5 Restructuring since 1974

Further restructuring of English local authorities has taken place since 1972. In broad terms, this has comprised moves away from the two-tier county and district system towards 'unitary authorities', exercising all the functions of county and district councils, in selected areas of England. The rationale for this change has varied, but concerns about simplification of public administration and economies of scale have frequently been present. For the most part, the subsequent changes have used the district council areas of 1974 as 'building blocks' for new unitary authorities.<sup>18</sup>

It is not possible to identify any clear pattern linking the areas now covered by unitary authorities. Some unitary authorities are former county councils, some former county boroughs, and some neither. Each of the 'rounds' of change was an independent political initiative, with significant variations in their rationales and in the official criteria for approving new authorities. None of them have sought to impose a comprehensive pattern. The changes have had no implications for the overall system of functions and financing of local government.

Four 'rounds' of restructuring have taken place, as follows:

**Abolition of the metropolitan county councils and GLC.** The six metropolitan county councils and the Greater London Council were

---

<sup>16</sup> These were West Midlands; Greater Manchester; Merseyside; South Yorkshire; West Yorkshire; and Tyne & Wear

<sup>17</sup> For instance, Herefordshire and Worcestershire merged to form Hereford & Worcester; Rutland was absorbed into Leicestershire; and Huntingdonshire into Cambridgeshire. New counties included Avon, Cumbria, Cleveland and Humberside.

<sup>18</sup> See Alan Townsend, "Combined authorities: where next?", *Town and Country Planning*, September 2017. See also Copus, Roberts and Wall, *Local Government in England: centralisation, autonomy and control*, 2018, p90&ff: they term this phenomenon 'mergers and acquisitions'. There are exceptions to this pattern: for instance, York City Council absorbed portions of its neighbouring districts on achieving unitary status in 1996; and Malvern Hills DC exchanged areas with a re-created Herefordshire unitary authority in 1998.

abolished in 1986, in line with the proposals in the 1984 Government white paper *Streamlining the Cities*. The Government claimed that the strategic and planning functions of these bodies were too thin to justify their retention. Many of the metropolitan counties' functions were transferred to metropolitan district councils in their areas, whilst some were exercised or overseen by conurbation-wide joint boards.<sup>19</sup>

**The Local Government Review (the Banham / Cooksey Review: 1992-95).** A Local Government Commission was established to review all local authorities in England, in five groups, to establish whether 'structural change' – i.e. a move to a unitary structure – was desirable. Government guidance stated that the Commission "should recommend a structure which, in its view, best combined cost effectiveness with a reflection of community identities and interests".<sup>20</sup> The Commission itself also decided to "examine the extent to which dissatisfaction remains with the local outcomes of the last reorganisation ... evidence presented to the Commission suggests that in many cases the boundaries that were defined then were not rooted in the reality of local communities".<sup>21</sup>

The legislation required any structural change proposed to have regard to the need:

- (a) to reflect the identities and interests of local communities; and
- (b) to secure effective and convenient local government.<sup>22</sup>

The same concern with 'communities' and 'identities' was visible in the Government guidance and in debates in Parliament.<sup>23</sup> This marked a change in emphasis compared to Redcliffe-Maud, which had focused more strongly on the 'pattern of living' than on 'affective identity' associated with specific areas.

Though the Local Government Commission was free in principle to make recommendations for or against unitary status, its initial recommendations supported unitary status in most areas. Updated guidance issued in 1993 stated that "the Government expects that [the continuation of the two-tier structure] to be the exception, and that the result will be a substantial increase in the number of unitary authorities in both urban and rural areas".<sup>24</sup>

This provision was challenged by Lancashire County Council via judicial review during 1994. The High Court ruled that this direction was unlawful, and the guidance was reissued with those words removed. The number of proposed unitary authorities was scaled back in the Commission's final recommendations. In the end, 46 new unitary authorities were created.

---

<sup>19</sup> Department of the Environment, *Streamlining the cities*, 1984, p5

<sup>20</sup> DoE, *Policy Guidance to the Local Government Commission for England*, 1993, p3

<sup>21</sup> Local Government Commission, *Renewing Local Government in the English Shires: A Progress Report*, 1993, p10

<sup>22</sup> *Local Government Act 1992*, section 13 (5)

<sup>23</sup> See Ken Young, Brian Gosschalk and Warren Hatter, *In search of community identity*, MORI, 1996, p5-6

<sup>24</sup> DoE, *Policy Guidance to the Local Government Commission for England*, 1993, p2

**The Labour Government review (2007-09).** This round of restructuring emerged from the White Paper *Strong and prosperous communities* (2006), and the *Local Government and Public Involvement in Health Act 2007*. The 2007 Act introduced an application-based process for unitary status. Criteria for proposals for new unitary authorities were published in a document entitled *Invitation to councils in England to make proposals for new unitary structures*. This document stated:

- i) the change to the future unitary local government structures must be:
  - affordable, i.e. that the change itself both represents value for money and can be met from councils' existing resource envelope; and
  - supported by a broad cross section of partners and stakeholders; and
- ii) those future unitary local government structures must:
  - provide strong, effective and accountable strategic leadership;
  - deliver genuine opportunities for neighbourhood flexibility and empowerment;and
  - deliver value for money and equity on public services.<sup>25</sup>

These criteria marked a further shift in emphasis toward criteria related to performance, structure and efficiency, excluding any considerations of either economic areas or community identity. The White Paper had touched on these issues, though inconclusively:

Many district boundaries reflect artificial communities with little significance for local people. This lack of community identity is reflected in the artificial names of some district councils. In other areas the boundary does not reflect the natural economic boundaries of a city or town, making it harder to plan for growth, and some district councils are too small to have the capacity to secure efficiency, drive change and provide strong leadership.<sup>26</sup>

Twenty-six proposals were submitted to the Government. Five county areas became unitary (Cornwall, Wiltshire, Durham, Shropshire and Northumberland) and two unitary authorities were introduced in two areas (Cheshire and Bedfordshire). These unitary authorities launched in April 2009. This review too saw two judicial reviews of decisions to abolish district authorities, both of which were unsuccessful.

**Individual reviews in the late 2010s.** Further unitary authorities have been approved in the late 2010s. The first two examples listed below arose from local proposals, whilst the third was imposed by the Government:

- Two new unitary authorities were created in Dorset in April 2019: one covering the former councils of Christchurch, Bournemouth

---

<sup>25</sup> DCLG, [Invitation to councils in England to make proposals for new unitary structures](#), 2006, p9

<sup>26</sup> DCLG, *Strong and Prosperous Communities*, 2006, p63

## 12 Where do you draw the line? Local administrative boundaries in England

and Poole, and one covering the remainder of the county council area;<sup>27</sup>

- Buckinghamshire will become a unitary county as of April 2020;
- Two unitary authorities will replace Northamptonshire County Council and its districts from April 2021. This follows a well-publicised period of financial difficulties for the county council in 2018, including the issue of a section 114 notice in February.

Though no national guidance has been issued in the late 2010s, guidance was issued to the Northamptonshire authorities in early 2018. This guidance is likely to reflect the Government's views more generally on the principles to be adopted for decisions on restructuring:

1. A proposal should seek to achieve for the area concerned the establishment of a single tier of local government, that is the establishment of unitary authorities:
  - a. which are likely to improve local government and service delivery across the area of the proposal, giving greater value for money, generating savings, providing stronger strategic and local leadership, and which are more sustainable structures;
  - b. which command a good deal of local support as assessed in the round overall across the whole area of the proposal; and
  - c. where the area of each unitary authority is a credible geography consisting of one or more existing local government areas and having a substantial population that at a minimum is substantially in excess of 300,000.<sup>28</sup>

Pressures towards unitarization in the 2010s included the effects of 'austerity', and the anticipation that in future English local authorities would be financed mostly from locally-raised revenue. Leaders of several other councils, principally counties, have floated the possibility of restructuring during the 2010s.

### 2.6 The broader influence of the 1974 reforms

The changes described in this section concern English local authorities. However, the boundaries established in 1974 have been utilised since by many public bodies that lie outside local authority control. For instance, executive agencies often manage a network of sub-regional offices, each covering two or more 1974 county areas. The Government often lets contracts to service providers covering geographies that are amalgamations of county areas. Examples include the Work Programme and Community Rehabilitation Companies. Separate contracts are free to use separate groupings of areas: no cross-governmental standard exists for this practice, and there are also examples of administrative boundaries that do not follow 1974 county areas.

Therefore, choices made in 1972-4, which may have been influenced by political disputes or consist of a compromise between opposing

---

<sup>27</sup> This is also the first case of a merger between unitary authorities that have been created since 1972.

<sup>28</sup> MHCLG, [Invitation to submit a proposal for a single tier of local government in Northamptonshire](#), 27 March 2018

pressures, often continue to influence current administrative geographies. Furthermore, many of the districts created at that time were themselves aggregations of predecessor authorities, and their geographies did not necessarily reflect economic or social realities either in the 1970s or the present day.<sup>29</sup>

In other words, *historical contingency* exercises a major influence on the pattern of administrative boundaries in England. It is rare for public bodies to produce explicit rationales for the administrative boundaries that they use. It seems likely that, in most cases, their boundaries are based on functional needs. As with previous rounds of unitary restructuring, these bodies use existing geographies as 'building blocks' to divide England into a certain number of administrative areas. There is no legal compulsion on them to do this; it seems likely that this occurs purely out of administrative convenience.<sup>30</sup>

---

<sup>29</sup> Ken Young, Brian Gosschalk and Warren Hatter, *In search of community identity*, 1996, p2

<sup>30</sup> See Alan Townsend, "Combined authorities: where next?", *Town and Country Planning*, September 2017, p346. One notable exception is the Environment Agency, which bases its regions and 'flood and coastal committees' on water basins: see [Environment Agency area and region operational locations](#), 2014

## 3. Functional economic market areas (FEMAs)

### 3.1 The concept of functional areas

An alternative to the use of administrative boundaries based on historical practice and precedent is the concept that local geographical boundaries can and/or should be based on human behaviour, amenable to large-scale statistical analysis. The areas produced by such analysis are known collectively as 'functional economic areas' (FEAs) or 'functional economic market areas' (FEMAs). Other terms are used to denote specific variants (see below). FEMAs have been used for analytical purposes by the UK Government for some 50 years.

FEMAs are based on patterns of one or more types of economic activity. For instance, a 'travel to work area' is an area within which more than a certain proportion of individuals live and work. This proportion is known as the area's level of 'closure'. This approach reflects the idea of 'effective identity': the belief that it is the patterns of daily life, rather than affective or historical loyalties, that determine people's allegiance to a place and acceptance of it as a unit of governance.

The FEMA concept has periodically influenced debate over local boundaries in England. Much of the debate around the Redcliffe-Maud Commission, and the 1974 reforms, was based on the idea that patterns of economic activity, and urbanisation, should form a critical influence on local administrative boundaries. A related aim is to avoid, or minimise, 'spillover' – where an authority pays for services that are substantially used by citizens from neighbouring authorities.

However, since 1974 the influence of FEMAs on English local boundaries has mainly been confined to statistical analysis. Governments have regularly alluded to the importance of economic geography to local policy-making, but its influence on *administrative boundaries* has been very muted.

### 3.2 FEMAs in policy-making

Commentators and Government policy papers have regularly indicated support for a functional approach to local policy-making. The 2006 document *A Framework for City-Regions*, produced by researchers from the University of Manchester, used the term 'city-region' to describe functional areas. It said:

City-Regions are the enlarged territories from which core urban areas draw people for work and services such as shopping, education, health, leisure and entertainment. The city-regional scale also plays a significant role for business in organising supply chains and accessing producer services.<sup>31</sup>

---

<sup>31</sup> Alan Harding, Simon Marvin and Brian Robson, [A Framework for City Regions](#), DCLG, 2006, p5

The 2007 *Sub-National Review of Economic Development and Regeneration* said:

Many people and economic flows overlap local authority boundaries, so that the functional economic areas over which key economic markets operate are typically much larger than the administrative units of local authorities, and broadly correspond to sub-regions or city-regions.<sup>32</sup>

The 2007 Lyons Inquiry report said:

Economic theory suggests that decisions on issues relevant to economic activity should ideally be taken at a spatial scale which reflects the pattern of that activity if they are to take into account all of the costs and benefits, and there are widespread concerns that since the current structure of local authority boundaries does not reflect economic geography, local authorities are not appropriate bodies to which to devolve greater powers.<sup>33</sup>

In 2010 the Coalition Government explicitly referenced the idea of functional economic areas in the documents announcing the abolition of the nine Regional Development Agencies in favour of Local Enterprise Partnerships:

We have been concerned that some local and regional boundaries do not reflect functional economic areas. We wish to enable partnerships to better reflect the natural economic geography of the areas they serve and hence to cover real functional economic and travel to work areas.<sup>34</sup>

Local Enterprise Partnerships (LEPs: see section 5.2) mostly base their geographies on groupings of district council areas, but frequently cross county boundary areas or overlap with one another, in order to reflect economic geography. For the Government, this is a strength of LEPs:

One of the great strengths of Local Enterprise Partnerships is their ability to bring together business and civic leaders across local administrative boundaries and provide strategic direction for a functional economic area. This will remain central to the success of Local Enterprise Partnerships...<sup>35</sup>

Nevertheless, the Government's 2018 policy paper [Strengthened Local Enterprise Partnerships](#) proposed to require the ending of boundary overlaps by April 2020.

Similar concerns animated many of the negotiations to form combined authorities. The Sheffield City Region encouraged authorities from northern Derbyshire and Nottinghamshire, which form part of the Sheffield travel-to-work area, to join the combined authority. An attempt by Chesterfield and Bassetlaw district councils to do so was blocked by a judicial review of the consultation process. This episode exemplified the tensions that can arise between FEMAs and historical geographies.<sup>36</sup>

---

<sup>32</sup> HM Treasury, [Review of Sub-National Economic Development and Regeneration](#), 2007, p49

<sup>33</sup> *Lyons Inquiry into Local Government*, 2007, p98

<sup>34</sup> Rt Hon Vince Cable MP, [Local Enterprise Partnerships](#), 29 June 2010

<sup>35</sup> MHCLG, [Strengthened Local Enterprise Partnerships](#), 2018, p7

<sup>36</sup> For additional detail, and subsequent developments in Yorkshire, see the Library briefing paper [Devolution to local government in England](#).

Furthermore, there are questions over how far LEPs do in fact reflect functional economic areas. Some scholars have argued that many LEP geographies emerged from previous patterns of joint working, and that many of them reflect political relationships rather than the shape of local economies.<sup>37</sup>

### 3.3 Different forms of functional areas

There are a number of approaches to defining functional areas, based on different socio-economic data sets. FEA analyses normally combine a number of datasets to arrive at a pattern of local boundaries.

#### Travel to Work Areas (TTWAs)

TTWAs, or labour market areas (LMAs), represent areas within which a substantial percentage of the resident population also work. Forms of TTWA have been used for several decades: for instance, as the basis for reporting monthly unemployment rates.

In 2016 the Office for National Statistics published a pattern of travel-to-work areas (TTWAs), based, like the three previous sets, upon at least 75% of the population in each area both living and working within it. This is the level of 'closure'.<sup>38</sup> The pattern is based upon 2011 census data. The ONS's approach requires TTWAs not to overlap; and it sets a minimum population of 3,500 for a TTWA (though in practice most have far larger populations).

#### Housing market areas

A housing market area is "a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work".<sup>39</sup> Housing market areas are used to define optimal areas for carrying out planning for future housing need (DCLG 2010). HMAs take into account patterns of travel to work (thus overlapping conceptually with TTWAs); patterns of 'migration' (i.e. decisions or intentions around moving house); and house prices.

A related concept is that of 'broad rental market areas' (BRMAs), BRMAs are frequently similar in shape to HMAs. They are used as geographical units for setting Local Housing Allowance - the maximum rates of housing benefit payable to private sector landlords.

HMAs' role in policy-making is relatively recent. They were first mentioned explicitly in 2006 in the then Government's Planning Policy Statement 3. This stated that planning authorities "should have regard to housing market areas in developing their spatial plans and these

<sup>37</sup> See James Rees and Alex Lord, "Making space: putting politics back where it belongs in the construction of city regions in the North of England", *Local Economy* 28 7-8, 679-695; Alan Townsend, "Combined authorities: where next?", *Town and Country Planning*, September 2017; Andy Pike et al, "Austerity states institutional dismantling and the governance of sub-national economic development: the demise of the regional development agencies in England", *Territory, Politics, Governance* 6:1, 118-144, 2018

<sup>38</sup> ONS, [Travel to work area analysis in Great Britain](#), 2016. The analysis [includes an interactive map](#).

<sup>39</sup> DCLG, [Planning Policy Statement 3](#), 2006, p27

should be set out in the Regional Spatial Strategy".<sup>40</sup> The current National Planning Policy Framework is less explicit, stating that "strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period".<sup>41</sup> However, the associated [guidance on plan-making](#) does specify that local planning authorities should prepare a joint 'statement on common ground' concerning matters in which they have a common interest. This might include planning for housing development, and the guidance states that a statement should identify:

...the most appropriate functional geographical area to gather evidence and develop policies to address these matters, based on demonstrable cross-boundary relationships.

For example, housing market and travel to work areas, river catchments, or landscape areas may be a more appropriate basis on which to plan than individual local planning authority, county, or combined authority areas.<sup>42</sup>

The guidance goes on to define ways in which planning authorities could define HMAs and FEAs to assist with planning matters that they have in common.

## Supply chains / economic flows

Data can be used to trace flows of economic activity in the form of goods and services within a given area. This is analytically complex, as comprehensive data is difficult to obtain. Moreover, such analysis does not necessarily point towards definable geographies, as flows may relate more to large cities in their role as economic 'nodes' than to flows within fixed territories. DCLG published a note covering this issue in 2010, which said:

Supply chains are, however, very difficult to map as national data sources of sub-regional supply chains and linkages are not available. One approach is the identification of different sectoral clusters, where supply needs are estimated using input/output tables. Whilst this approach may be viable, it is questionable whether the information has much value, since it is not based on data about real links. The impact of firm ownership on procurement, for example, may mean supplies for plants are determined by wider corporate purchasing patterns. In the absence of evidence from official or commercial sources, detailed surveys would have to be commissioned.<sup>43</sup>

## Leisure market areas / service market areas

The concept of leisure market areas equates to that of travel-to-work areas, mapping areas within which individuals both live and make use of leisure facilities. As with TTWAs, the aim is to determine areas within which a certain percentage of 'closure' can be identified. The DCLG's paper states:

---

<sup>40</sup> DCLG, [Planning Policy Statement 3](#), 2006, p7

<sup>41</sup> MHCLG, [National Planning Policy Framework](#), 2018, p18

<sup>42</sup> MHCLG, [Guidance on plan-making](#), March 2019

<sup>43</sup> DCLG, [Functional Economic Market Areas: an economic note](#), 2010, p6

FEMAs can be identified by analysing travel patterns to higher order services, which have a wider catchment area, such as: major shopping centres, airports, concert halls or hospitals; the patterns of sub-regional newspaper readership; the audience geography of local radio stations; or further education college 'travel to learn' areas. This information only shows the pull of certain services, however, and will need to be used as part of a comprehensive approach to defining FEMAs.<sup>44</sup>

### 3.4 The limits of FEMAs

Cross-fertilisation between UK government decisions on administrative boundaries and analysis of functional boundaries has been the exception to the rule for the last 50 years.

The Redcliffe-Maud Report systematically analysed patterns of economic activity in England, and balanced these with other considerations when recommending a new pattern of local government. Since 1969, there has been no *systematic* analysis in the UK of the relationship between these two broad approaches to administrative geography. Government publications have frequently acknowledged that both may be relevant to policy-making, without identifying a particular approach. For instance, the 2007 *Review of Sub-National Economic Development and Regeneration* discussed the link between FEMAs and administrative boundaries:

...many local authorities are 'under-bounded' in that they cover too small a geographical area to encompass most economic markets and so are too small to tackle many economic challenges effectively. This gap between administrative and economic boundaries inhibits strategic decision-making and creates coordination challenges for economic policy-making between local authorities, risking policies that are not in the wider regional or national interest or the loss of policy opportunities that could make all places better off.<sup>45</sup>

That paper viewed FEMAs as a key to patterns of co-operation, not as a rationale for a restructuring of local authorities. Such a restructuring could be controversial, as FEMA boundaries frequently clash with historical boundaries or current administrative practice. Equally, FEMA analysis does not constitute a neutral approach to defining local areas. It rests on a number of judgements and considerations:

- FEMAs are based on multiple data sets: the weighting and treatment of the different data will influence the outcomes;
- FEMAs can be 'fitted' to administrative boundaries to a greater or lesser extent. Alternatively, the population covered by FEMAs can be subject to lower and/or higher limits, depending on the purpose for which they are to be used;
- The analysis must specify a level of 'closure'. For instance, TTWAs are normally defined by between 60% and 75% of the resident population also working in the area. Adopting a different

---

<sup>44</sup> Ibid., p6-7

<sup>45</sup> HM Treasury, [\*Review of Sub-National Economic Development and Regeneration\*](#), 2007, p49

percentage of 'closure' would be likely to produce a different set of boundaries;

- In the real world, FEMAs are not geographically distinct: they are likely to overlap or to be 'fuzzy' to some extent.<sup>46</sup> This would be hard to accommodate within a conventional structure of public administration, which requires accountability and administrative clarity;
- Reflecting long-term economic change, FEMAs change over time. For instance, Government analysis found that the UK had 228 TTWAs in 2011, 243 in 2001 and 308 in 1991, reflecting changes in commuting patterns.<sup>47</sup>

It follows that FEMA analysis has no automatic implications for the appropriate shape of administrative boundaries. For instance, the 2007 Lyons Inquiry recommends cross-boundary working, possibly on a range of different boundaries, to take account of economic geography. Similarly, the DCLG's 2010 report on housing market areas suggests that their analysis provides evidence regarding which local authorities should be working with one another rather than implying a need for structural reform.<sup>48</sup>

---

<sup>46</sup> See Mark Morrin and Phillip Blond, *Devo 2.0: the case for counties*, 2017, p.22

<sup>47</sup> Ibid.

<sup>48</sup> DCLG, *Geography of housing market areas*, 2010, p9

## 4. Place-shaping

### 4.1 Introduction

In the politics of England, local administrative boundaries are a low-profile matter. But decisions over their pattern have been engaged by a number of recent debates on sub-national governance in England. The 2010s have seen many policies emphasising greater local discretion in certain areas of policy-making, often including the creation of new locally-elected bodies, or transferring considerable decision-making power and/or funding to both elected and unelected local bodies.

A number of think tank reports have encouraged government to extend this practice, normally couching it in discussions of some version of 'place-shaping'. This phrase was coined by Sir Michael Lyons in his Inquiry into local government, published in 2007. It conveys the idea that local authorities have a generalised responsibility for their electorate, and are not merely multi-purpose delivery bodies for public services.

This section sets out a number of policy challenges to which 'place-shaping' has been presented as an answer during the 2010s.

### 4.2 What is place-shaping?

The concept of place-shaping dates from at least 1969, when the Redcliffe-Maud Report stated that local government's functions should include "an all-round responsibility for the safety, health and well-being, both material and cultural, of people in different localities... within a framework of national policies".<sup>49</sup> The 1972 Bains Report agreed:

Local government is not, in our view, limited to the narrow provision of a series of services to the local community... it has within its purview the overall economic, cultural and physical well-being of that community... because of this overall responsibility and because of the inter-relationship of problems in the environment within which it is set, the traditional departmental attitude within much of local government must give way to a wider-ranging corporate outlook.<sup>50</sup>

Academics have advanced similar concepts: for instance, the "politics of creative autonomy", proposed by Hugh Atkinson and Stuart Wilks-Heeg, and John Stewart's advocacy of 'community governance'.<sup>51</sup> However, the 2007 Lyons Inquiry was the first to create a detailed definition:

- building and shaping local identity;
- representing the community;

<sup>49</sup> Lord Redcliffe-Maud, *Commission on the Future of Local Government*, volume 1, 1969, p10

<sup>50</sup> Department of the Environment, *The new local authorities: management and structure* [The Bains Report], 1972, p6.

<sup>51</sup> John Stewart, *The Nature of British Local Government*, 2000; Hugh Atkinson and Stuart Wilks-Heeg, *Local government from Thatcher to Blair: the politics of creative autonomy*, 2000

- regulating harmful and disruptive behaviours;
- maintaining the cohesiveness of the community and supporting debate within it, ensuring smaller voices are heard;
- helping to resolve disagreements;
- working to make the local economy more successful while being sensitive to pressures on the environment;
- understanding local needs and preferences and making sure that the right services are provided to local people; and
- working with other bodies to response to complex challenges such as natural disasters and other emergencies.<sup>52</sup>

Lyons also argued that the place-shaping role implied local government acting as a convenor of the views of the locality on public bodies not under its control:

The local authority should have a role in representing the community interest and influencing any service that has an impact on local people, whatever the formal arrangements for the management of that service. That is especially important where those impacts fall on the community as a whole.... Local authorities should be recognised as the body in the locality with the responsibility of bringing together the efforts of the public sector, and also of relevant parts of the private and voluntary sectors, to secure local well-being through a convening role. That is at the heart of what place-shaping is about.<sup>53</sup>

This vision has implications for local service provision that is not under the control of local authorities: for instance, NHS Clinical Commissioning Groups, JobCentre Plus, or further education colleges.

The concept of place-shaping contrasts with the idea that a key role of local government is to provide public services mandated by Parliament. This perspective too has been strong throughout English history. It is visible in the pattern of single-purpose authorities throughout much of the 19<sup>th</sup> century (see section 2.1); and it accords with some aspects of practitioner behaviour since. Scholars have suggested that, for much of the 20<sup>th</sup> century, local authorities in practice comprised loose federations of service departments held together by political management. Peter John suggested in 2014 that:

The same factors that ensured local government was usually well run also make sure that local politics was more about service delivery than promoting democracy. ....Power [in a local authority] tends to be concentrated in a central core comprised of the leading party politicians and senior bureaucrats, which can act cohesively to produce policy for the local authority. The outer parts of the organisation are the service-providing bureaucracies not in the centre.<sup>54</sup>

---

<sup>52</sup> *Lyons Inquiry into Local Government*, 2007, p3

<sup>53</sup> *Ibid.*, p62

<sup>54</sup> Peter John, "The great survivor: The persistence and resilience of English local government", *Local Government Studies* 40:5, 687-704

There is evidence that successive UK governments shared this transactional view of local government. For instance, the then Government's 1977 Green Paper stated that "Parliament has entrusted the running of many important social and other services to democratically elected local bodies".<sup>55</sup> It also states that public services are "shared on a partnership basis".<sup>56</sup> Moreover, Ministers held legal powers to supervise services in health, education, children's services, and water during much of the 20th century.<sup>57</sup> More recently, Melanie Dawes, permanent secretary of MHCLG, stated on 26 November 2018 that the Government viewed local authority financial sustainability as consisting of councils having "the right resources and capability...to be able to deliver the statutory services that are set out by Parliament".<sup>58</sup> She did, however, expand on this in January 2019 by saying that the Government does also "take into account the flexibility councils need to deliver non-statutory services and to respond to events".<sup>59</sup>

### 4.3 Where is 'place'?

Recent debates on place-shaping have mostly not addressed the question of how to define the 'places' to 'shape'. This reflects a number of historical and intrinsic contexts, including:

- The political struggles and judicial challenges surrounding each round of unitary restructuring since 1974;
- The explicit opposition to some of the 1974 authorities that covered non-traditional areas;
- The lack of a readily identifiable pattern of affective local identities in England, and – in part as a result – the low political salience of local administrative boundaries;
- The challenge of 'fuzzy boundaries': a number of the policy areas addressed in the previous section do not necessarily point towards precisely defined geographies.

These challenges are long-standing and pervasive, and they contribute to the fact that local administrative boundaries in England are currently extremely heterogeneous.

Furthermore, much recent debate on this subject is tacitly normative: that is, it makes a number of assumptions about shortcomings of current patterns of local administration. Three assumptions in particular can be identified:

- The idea that boundaries should, at least to some extent, reflect 'affective identity'. Though rarely explored in detail, this refers

---

<sup>55</sup> Department of the Environment, *Local Government Finance: Green Paper*, Cmnd 681, 1977, p.3

<sup>56</sup> *Ibid.*, p5

<sup>57</sup> Keith-Lucas B. and P. Richards, *A History of Local Government in the 20<sup>th</sup> Century*, 1978

<sup>58</sup> Public Accounts Committee, [Local government spending: oral evidence](#), HC-1775 2017-19, 26 November 2018, Q2

<sup>59</sup> Housing, Communities and Local Government Committee, [Oral evidence: MHCLG Annual Report and Accounts 2018-19](#), HC-1737, 21 Jan 2019, p5

implicitly to the idea of local loyalties to place – often, though not always, to historic English counties;

- The idea that boundaries should be ‘coterminous’ – i.e. that it is inherently beneficial and efficient for different public bodies to use the same boundaries as one another;
- Scale: the idea that there is an optimal size range for a local authority – normally based on population – and that there exist lower and upper limits beyond which local authorities are measurably less functional or efficient.

These assumptions are explored in further detail below.

## 4.4 Coterminous boundaries

When two or more organisations’ boundaries are identical, they are described as being *coterminous*. Alternatively, the boundaries of one organisation may contain multiple local divisions of another organisation within its area, which do not cross the first organisation’s boundaries. For instance, a county council area might contain three Clinical Commissioning Groups.

The degree of ‘coterminosity’ of local administrative boundaries varies hugely across the country. This is demonstrated by [an interactive map produced by the National Audit Office](#) in late 2017. This maps the (then) six Mayoral Combined Authorities against a number of other public sector organisations. Greater Manchester, the combined authority with the most substantial powers, has coterminous boundaries with more of the organisations examined than its counterparts elsewhere do.

In many reports, an assumption can be detected that coterminous boundaries are inherently beneficial. The expectation is that they facilitate joining up between public bodies, enabling more effective policy-making and delivery. The Health and Social Care Committee’s inquiry into Sustainability and Transformation Partnerships (STPs) in the NHS, published in May 2018, came to this conclusion:

STP footprints with a smaller population, a smaller number of partners, boundaries that align with patient flows between services and coterminous organisational boundaries between partners tend to be further ahead.<sup>53</sup> Boundaries in the more advanced areas tend to align with pre-existing relationships, often built around a geographical area that is clear, practical and recognised locally.<sup>60</sup>

IPPR’s *Rebooting Devolution* argues in favour of “opportunities for much closer working arrangements with other public services who operate across a similar larger geography”.<sup>61</sup> They suggest that “government should make it clear that it would be willing to consider

---

<sup>60</sup> House of Commons Health and Social Care Committee, *Integrated care: organisations, partnerships and systems*, HC-650 2017-19, May 2018, paragraph 67

<sup>61</sup> IPPR, *Rebooting Devolution: A Common-Sense Approach to Taking Back Control*, 2017, p9

proposals from local stakeholders to formally review the boundaries of public services in order to align them better with each other".<sup>62</sup>

The IfG report *Joining Up Public Services around local, citizen needs* suggests five reasons why joining up has frequently proved elusive, one of which is that "misaligned geographies and the patchwork of commissioning, funding and regulatory processes can make it difficult for local actors to design services around a 'whole person'... it is essential to think strategically about whether certain geographies may help or hinder joining up around local, citizen needs and how this might inform the distribution of powers and functions across the system."<sup>63</sup> Reform suggest that "the absence of coterminous boundaries between the areas covered by different commissioning bodies and providers affects their capacity to collaborate and build partnerships".<sup>64</sup> Similarly, "as services share geographical boundaries, fragmentation is minimised and the opportunities for collaboration between public services are increased".<sup>65</sup>

ResPublica state that "coterminous boundaries are important when delivering services for people with multiple and complex needs... a lack of coterminosity.. affects the ability to deliver integrated services".<sup>66</sup> They argue that "collaboration is undoubtedly easier where the boundaries of the relevant organisations are the same".<sup>67</sup> A report led by Ruth Lupton, at the London School of Economics, suggests that "the principle of place-based integration would suggest that decision-making powers and services should be moved onto the same boundaries".<sup>68</sup> The Government too acknowledges a case for coterminosity: the 2018 consultation paper on LEP reform states that the Government "would encourage areas to move towards coterminous Local Enterprise Partnership and mayoral combined authority boundaries, but recognising that this will not be possible in all cases".<sup>69</sup>

However, though the case for coterminous boundaries may seem intuitive, there is little definitive research evidence to demonstrate that coterminous boundaries improve decision-making, partnership working, or implementation (or that they do not do so).

## 4.5 Affective identity

'Affective identity' – a sense of loyalty to place or local belonging – has featured sporadically in debates over English administrative boundaries.

---

<sup>62</sup> IPPR, [Rebooting Devolution: A Common-Sense Approach to Taking Back Control](#), 2017, p11

<sup>63</sup> Sophie Wilson, Nehal Davison, Molly Clarke and Jo Casebourne, [Joining up public services around local, citizen needs](#), Institute for Government, 2017, p10-12

<sup>64</sup> Alexander Hitchcock, Maisie Borrows, Eleonora Harwich, [Vive la devolution: devolved public services commissioning, Reform, 2017](#), p41

<sup>65</sup> Ibid., p.43

<sup>66</sup> Alexander Hitchcock, Maisie Borrows, Eleonora Harwich, [Vive la devolution: devolved public services commissioning, Reform, 2017](#), p.42

<sup>67</sup> Mark Morrin and Phillip Blond, *Devo 2.0: the case for counties*, 2017, p23. See also Phil Swann, op. cit., p.19-20

<sup>68</sup> Ruth Lupton, Ceri Hughes, Sian Peake-Jones and Kerris Cooper, [City-region devolution in England](#), SPDO research paper 2, November 2018, p14

<sup>69</sup> MHCLG, [Strengthened Local Enterprise Partnerships](#), 2018, p25

The argument runs that individuals in England identify strongly with local areas, in particular traditional county areas, and that this should influence decisions to restructure administrative geographies. For instance, IPPR's report *Rebooting Devolution* states that "any proposed devolution area must be based around existing institutions and a shared sense of place".<sup>70</sup> ResPublica state that "popular support is also linked to the identity and history of a place, where recent local government units have often been arbitrary and frequently challenged".<sup>71</sup> The Royal Town Planning Institute's 2014 paper *Making Better Decisions for Places* states that many traditional boundaries are unsuitable for specific functional challenges, but cautions that "cooperation among people working within a traditional boundary for the greater good of an area to which they feel a connection is something that may be difficult to reproduce if areas are redrawn".<sup>72</sup>

Affective identity has played a varied role in the English boundary debate. The 1992-95 Local Government Commission enquired into local identity, local preferences, and 'patterns of activity'. There was an explicit aim of abolition of "certain of the authorities which were created by the local government reorganisation of 1974, but which have not succeeded in inspiring local loyalty".<sup>73</sup> However, the Commission gave different weight to each of these concerns at different times over its lifetime, with local identity and preferences latterly giving way to 'patterns of activity'.<sup>74</sup> In contrast, the 2007-09 and 2018-19 rounds of restructuring made almost no mention of affective identity.

The limited research evidence on the subject suggests uncertain local identities in most parts of England. Young et al's 1996 study *In search of community identity* found that the village, town or city was the area that individuals most frequently identified with: but the largest group identified by their analysis was the 'unattached', who did not identify strongly with any geographical area.<sup>75</sup> This did not necessarily have any implications for government structures, however. A study in 1992 found that:

...the boundaries of local authority areas did not typically seem very familiar or important, unless they happen to coincide with some emotionally more significant areas. It was not the local government element that people seemed to identify with, but the underlying sense of clan or community with which a specific geographical area might be imbued.<sup>76</sup>

---

<sup>70</sup> IPPR, *Rebooting Devolution: A Common-Sense Approach to Taking Back Control*, 2017, p10

<sup>71</sup> Mark Morrin and Phillip Blond, *Devo 2.0: the case for counties*, 2017, p8

<sup>72</sup> RTPI, *Planning Horizons: Making Better Decisions for Places*, 2014, p34

<sup>73</sup> [HCDeb 21 Mar 1991](#) c401

<sup>74</sup> Steve Leach, "The Local Government Review: A 'Policy Process' Perspective", *Local Government Studies* 23:3, p23

<sup>75</sup> Ken Young, Brian Gosschalk and Warren Hatter, *In search of community identity*, MORI, 1996

<sup>76</sup> A. Hedges and J. Kelly, *Identification with Local Areas*, Department of the Environment, 1992, p5

Opinion research carried out during the 1992-95 Local Government Review came to broadly the same conclusion.<sup>77</sup> More recently, the BBC ran a very large polling exercise with YouGov poll in 2018. This found stronger local identities in the North than in the South, with strong local identities also existing in Cornwall, Devon, Kent, East Anglia and parts of the Midlands.<sup>78</sup> The survey asked whether respondents identified as being from a 'specific part of the country' or 'county', but did not probe which 'part' respondents referred to. Meanwhile, in 2017 a survey of residents of Greater London in 2017 found that 46% chose 'Londoner' as their primary identity, with 17% choosing 'British' and 12% 'English'.

None of these surveys have been accompanied by detailed qualitative research, making it difficult to assess the meaning of any such 'identification' for respondents or how (or whether) they view it as relevant to government and politics.

## 4.6 Scale

The scale of a local authority – normally measured by the population in its area – is a perennial element of debate over local authority structures. The optimal population size of a local authority depends to some extent on its functions. The trend of Government thinking in recent decades has been towards supporting the establishment of larger unitary authorities.

Generally, evidence regarding the optimum scale of local authorities is equivocal. The Redcliffe-Maud Commission's research on the point did not point to any one optimum population size: the optimum was different for different services, and other factors, such as the quality of management or the social challenges faced by the authority, were likely to be more significant.<sup>79</sup> Several bodies submitted evidence to Redcliffe-Maud: for instance, the then Department for Education and Science suggested that education authorities should have a minimum population of 500,000. The Association of Metropolitan Councils argued that 200,000 was sufficient for the administration of most services.<sup>80</sup>

The 1992-95 Local Government Review was provided with no maximum or minimum size in official guidance. Its early recommendations suggested it viewed the optimum population size for unitary authorities at between 150,000 and 200,000. In contrast, guidance in the 2010s recommended populations of 300,000 to 700,000 for new unitary authorities. Evidence and rationales backing up either of these ranges of figures are not available.

<sup>77</sup> Local Government Commission for England, *Final Recommendations for the future local govt of Avon, Somerset and Gloucestershire*. London: HMSO. Dec 1993, p12

<sup>78</sup> BBC, "[The English question: Young are less proud to be English](#)", 3 June 2018

<sup>79</sup> Tony Travers, George Jones and June Burnham, *The impact of population size on local authority costs and effectiveness*, Joseph Rowntree Foundation, 1993, p11-12

<sup>80</sup> See Tony Travers, George Jones and June Burnham, *The impact of population size on local authority costs and effectiveness*, Joseph Rowntree Foundation, 1993, p9-12

A Joseph Rowntree Foundation study from 1993 found very little relationship between measures of performance and population levels, either in the UK or other states:

...It may be possible to show a link between population size and costs or effectiveness in some parts of some services, the relationship is by no means all one way, and there are other factors which probably matter much more ... The political culture and management style of a county, district or borough are widely accepted as being most important in determining how efficient and effective an authority is.<sup>81</sup>

The same study also suggested that “there is still considerable resistance in parts of Whitehall... to allow[ing] some services to be run by authorities with what they regard as relatively small populations”.<sup>82</sup> However, it did find some evidence of economies of scale in certain areas of local authority operations.<sup>83</sup>

A 2016 study by Shared Intelligence suggested that larger authorities were more able to devote a larger proportion of their resources to front-line services, and that smaller unitary authorities established in the 1992-95 review had struggled to take on services formerly run by a county council.<sup>84</sup> This report also referenced the transition costs of restructuring, including those of splitting up county-level services into smaller geographical units. That is a distinct debate from the question of ongoing administrative costs arising from one or other ‘size’ of local authority.

Reports on historical practice in England vary in the extent to which financial efficiency is a constraint on the size of a local authority. Michael Chisholm’s *Structural Reform of English Local Government: Rhetoric and Reality*, published in 2000, found that many of the promises of savings from the 1992-95 round of restructurings had not been met. Chisholm and Steve Leach’s *Botched Business* (2008) makes similar predictions concerning the restructuring of 2007-09. More recently, Ernst & Young produced a series of estimates in 2014 of the savings available from different approaches to unitary restructuring. All options saved some money, but larger unitaries saved more.<sup>85</sup>

---

<sup>81</sup> Tony Travers, George Jones and June Burnham, *The impact of population size on local authority costs and effectiveness*, Joseph Rowntree Foundation, 1993, p22

<sup>82</sup> *Ibid.*, p7

<sup>83</sup> *Ibid.*, p17

<sup>84</sup> Phil Swann, [Learning the lessons from local government reorganisation](#), Shared Intelligence, 2016, p3

<sup>85</sup> Ernst & Young, [Independent analysis of Governance Scenarios and Public Service Reform in County Areas](#), 2016.

## 5. Why does place-shaping matter now?

Place-shaping has emerged within a number of policy debates in the 2010s. It has largely appeared as an issue within think-tank reports, rather than being raised as a live issue by practitioners from the local government sector or other public services.<sup>86</sup>

The following long-term concerns emerge as susceptible to influence from place-shaping:

- The intention to devolve power to local areas in England, to strengthen local decision-making and to help to boost investment, infrastructure, and productivity;
- A concern to increase economic growth, and/or to balance growth rates between more and less prosperous parts of England;
- The successful implementation of Local Industrial Strategies;
- Promotion of 'public service reform', including more efficient use of public funds, joining up different services to avoid 'silo government', and more latitude for local policy variations in response to expressed local preference;
- Public accountability for a greater range of local decision-making – essentially the role of convening local views noted by the Lyons Inquiry.

The following sections set out how these concerns have been expressed.

### 5.1 Greater autonomy in decision-making for local institutions

The UK Government initiated a series of bespoke 'devolution deals' for mayoral combined authorities (MCAs) and other bodies in November 2014, when the Greater Manchester Agreement was published. This has been followed by the creation of seven directly-elected mayoralities, with an eighth to follow in May 2019. Many think-tank reports have praised the principle of devolving power. The RSA's Inclusive Growth Commission stated that "achieving inclusive growth in practice will need policies and approaches that are designed and delivered locally... by devolving powers and responsibilities where appropriate".<sup>87</sup> IPPR cites devolution of power as "a means to addressing several key policy

---

<sup>86</sup> Examples include the Royal Society for the encouragement of Arts, Manufactures and Commerce's [City Growth Commission](#) (2014) and [Inclusive Growth Commission](#) (2017); the report of the Institute for Public Policy Research's [Commission on Economic Justice](#) (2017); ResPublica's [Devo 2.0: the case for counties](#) (2017); Reform's [Vive la devolution: devolved public services commissioning](#) (2018); NLGN's [Place-Based Policy-making after Brexit](#) (2018); the Institute for Policy Research's [Place-Based Perspectives on the UK's Industrial Strategy](#) (2018); and Localis's [The Making of an Industrial Strategy](#) (2017). The newly-launched [UK 2070 Commission](#), investigating regional inequalities, may also take a similar perspective.

<sup>87</sup> RSA Inclusive Growth Commission, [Making Our Economy Work for Everyone](#), 2017, 12

challenges, not least improving housing supply, boosting productivity, and reforming public services”.<sup>88</sup>

The directly-elected mayors have a range of general powers (see the Commons Library briefing paper *Devolution to local government in England*), principally concerning economic development and related matters. LEPs in the mayors’ areas often operate on different boundaries from the MCA: examples include the West Midlands and Sheffield City Region. MCAs admit as ‘associate members’ local authorities that are not within their electorates but that they regard as within their functional economic areas.

IPPR has called for “a series of clear and explicit principles concerning the geography and scale of devolution areas”.<sup>89</sup> The report of the IPPR Commission on Economic Justice states that “functional ‘travel to work’ areas provide the appropriate scale of economic governance, particularly to integrate spatial and transport planning, and to develop education, skills and business support policies to meet the needs of local labour markets”.<sup>90</sup>

The impetus to devolve power aligns with concerns over the productivity and competitiveness of many English cities in comparative terms.<sup>91</sup> The idea that administrative boundaries should be based on, or take account of, economic activity finds echoes in academic debates in economic geography. Local economies are perceived to grow most effectively via ‘agglomeration’. This is the idea that localities benefit from attracting a large number of firms operating in related fields, creating a virtuous circle of innovation.

Elected leaders and policy-makers can encourage this process by creating a ‘narrative’ to attract firms and investment to a locality. This is based both on the quality of local skills, housing, transport links and cultural offerings, but also on “the underlying strengths of an area in certain economic activities which have emerged from the unique historical, political, social, economic and technological evolution of a location”.<sup>92</sup>

Generally, debate over the appropriate geography for devolution deals has been muted. This is despite the issue arising in a number of negotiation processes. These include Sheffield (see section 3.2); East Anglia; Hampshire / Solent; Yorkshire; and North-East / North of Tyne. In practice the combined authority areas have adopted the ‘building block’ approach noted earlier.

---

<sup>88</sup> IPPR, [Rebooting Devolution: A Common-Sense Approach to Taking Back Control](#), 2017, p6

<sup>89</sup> IPPR, [Rebooting Devolution: A Common-Sense Approach to Taking Back Control](#), 2017, p15

<sup>90</sup> IPPR Commission on Economic Justice, [Prosperity and Justice: A Plan for the New Economy](#), 2018, p242

<sup>91</sup> Mark Morrin and Phillip Blond, [Devo 2.0: the case for counties](#), 2017, p.19

<sup>92</sup> Felicia Fai and Phil Tomlinson, “Local Enterprise Partnerships: Place-Based Industrial Strategy Advocates”, in Felicia Fai (ed.), [Place-Based Perspectives on the Industrial Strategy](#), 2018, p55. For a more critical view, see Ed Cox, [What Now for the North?](#), May 2018

Since 2017, the profile of ‘devolution deals’ has reduced. Devolution deals have been agreed with eleven areas, and the Government stated in July that it was open to further negotiations.<sup>93</sup> However, the Government rejected a proposal for a pan-Yorkshire combined authority in February 2019, on the grounds that Yorkshire did not comprise a functional economic area. Debate continues at the time of writing about the possibility of multiple combined authorities in Yorkshire. There are no other reports of further negotiations at the present time.

## 5.2 Local growth

Since 2010 the UK Government has sought to increase the tools available to localities to drive local economic growth. Policies have included business rates retention (see the Library briefing [Reviewing and reforming local government finance](#)), City Deals (see the Library briefing [City deals](#)), and the creation of Local Enterprise Partnerships (LEPs: see the Library briefing paper [Local Enterprise Partnerships](#)). LEPs were mostly established as local coalitions of businesses. They were expected to cover ‘functional economic areas’ and therefore the Government was willing to permit their boundaries to overlap. From 2011, some 19 LEPs had a geographical overlap with at least one neighbouring LEP.

LEPs are not public or statutory bodies. Nevertheless, governments since 2010 have provided them with substantial public money, via the Regional and Local Growth Funds, accompanied by a strict financial assurance framework. LEPs have been responsible for distributing these funds to local businesses, in accordance with their strategies.<sup>94</sup> This responsibility has generated questions about LEP governance. In November 2017, the National Audit Office published a report into the Greater Cambridgeshire and Greater Peterborough LEP, which was critical of the GCGP LEP’s local financial assurance framework.<sup>95</sup> This report built upon the Ney Review, published in October 2017, which made a range of recommendations for tighter accountability of LEPs for the distribution of public funds.<sup>96</sup>

In July 2018 the Government published a consultation paper entitled *Strengthening Local Enterprise Partnerships*. Amongst other requirements, the paper required LEPs to produce proposals by 28 September 2018 to eliminate overlaps of geographical boundaries:

On balance, Government considers that retaining overlaps dilutes accountability and responsibility for setting strategies for places and so will seek to ensure that all businesses and communities are represented by one Local Enterprise Partnership. Close

<sup>93</sup> The eleven areas are the eight MCAs plus West Yorkshire, London and Cornwall. See also MHCLG, [Strengthened Local Enterprise Partnerships](#), 2018, p7

<sup>94</sup> MHCLG, [Strengthened Local Enterprise Partnerships](#), 2018, p7

<sup>95</sup> National Audit Office, [Investigation into the governance of Greater Cambridge Greater Peterborough Local Enterprise Partnership](#), HC-410 2017-19, 29 Nov 2017

<sup>96</sup> MHCLG, [Review of Local Enterprise Partnership governance and transparency](#), 2017. Revised [transparency and governance guidance](#) was issued to LEPs in January 2018. See also Public Accounts Committee, [Governance and departmental oversight of the Greater Cambridge Greater Peterborough Local Enterprise Partnership](#), HC-896 2017-19, 16 Mar 2018

collaboration between Local Enterprise Partnerships will replace overlapping responsibilities.<sup>97</sup>

Any changes are to come into effect by April 2020.<sup>98</sup> Localities may also propose “wider changes such as mergers”. The *Municipal Journal* reported in November 2018 that LEPs “will have to remove overlaps if they want to qualify for cash from the UK Shared Prosperity Fund”.<sup>99</sup>

The tight timescale has triggered some fears of local disputes over boundary changes.<sup>100</sup> A National Audit Office report of May 2019 suggested that most boundary changes had been resolved, with the exception of Lincolnshire, Chesterfield, Buckinghamshire, and the Birmingham area.<sup>101</sup> Previously, only one LEP merger had taken place, between Northamptonshire and South East Midlands LEPs, in 2017.

## Local Industrial Strategies

LEPs (or Mayoral combined authorities where they exist) are also to lead on the production of local industrial strategies (LISs). These are to be submitted to the Government by March 2019, and agreed by the Government by March 2020.<sup>102</sup> These must “set out a long-term economic vision for their area based on local consultation”.<sup>103</sup> This must focus on the Industrial Strategy’s key priorities of “ideas, people, infrastructure, business environment and places”.<sup>104</sup> The Industrial Strategy White Paper focuses one of its chapters on ‘place’. However, for the most part this consists of a summary of existing initiatives.

The independent Industrial Strategy Commission published a report in 2017 calling for greater powers to be devolved to local or combined authorities to implement LISs, whilst also stating that LEP boundaries should “coincide with the appropriate economic geography”.<sup>105</sup>

It seems likely also that the UK Shared Prosperity Fund, and the current requirement for LEPs to reshape their boundaries to remove geographical overlaps, will be intended to dovetail with local industrial strategies.

LISs will be complemented by a number of national funding programmes, which it is likely that local areas will seek to bid to. Examples include the Global Grand Challenges Fund, the [National Productivity Investment Fund](#), the [Strength in Places Fund](#), and the [Industrial Strategy Challenge Programme](#). Total funding for these programmes runs into the billions of pounds between now and 2022-23. National initiatives such as One Public Estate and the Places for

---

<sup>97</sup> MHCLG, *Strengthening Local Enterprise Partnerships*, 2018, p7

<sup>98</sup> MHCLG, *Strengthened Local Enterprise Partnerships*, 2018, p23

<sup>99</sup> “Ministers won’t yield over LEP overlaps”, *Municipal Journal*, 15 Nov 2018

<sup>100</sup> See Robert Cusack, “Revealed: the areas embroiled in a LEP boundary tug of war”, *Local Government Chronicle*, 8 Nov 2018

<sup>101</sup> See NAO, *Local Enterprise Partnerships: an update on progress*, HC-2139 2017-19, May 2019, p15

<sup>102</sup> HM Government, *Local Industrial Strategies: Policy Prospectus*, October 2018, p7

<sup>103</sup> *Ibid.*, p4

<sup>104</sup> HM Government, *Industrial Strategy White Paper*, Nov 2017, p26

<sup>105</sup> Industrial Strategy Commission, *Final Report of the Industrial Strategy Commission*, November 2017

Growth Programme also form part of UK government policy towards place.<sup>106</sup>

### Pan-regional initiatives

The 'Northern Powerhouse' and 'Midlands Engine' initiatives embody the belief that certain policies (in this case transport, infrastructure and productivity) are best handled at a pan-regional level.<sup>107</sup> Though these started out as all-encompassing terms for economic policies in their regions, the Northern Powerhouse in particular now has institutional presence. This includes Transport for the North, a statutory advisory body; the Council for the North, a formal advisory body consisting of 11 LEP chairs; support from the business-led Northern Powerhouse Partnership; a civil society body, the People's Powerhouse; and an inaugural Convention for the North, held in Newcastle in September 2018. In similar terms, IPPR's Commission on Economic Justice proposed four 'regional economic executives' to exercise certain macroeconomic functions.<sup>108</sup>

## 5.3 Local commissioning of public services

A debate has emerged on 'public service reform' or 'local commissioning', in the wake of increasing financial pressures on local government since 2010. This debate has re-energised a longer-term theme of effective co-ordination of public services.

Concerns around co-ordination at local level between different public services are as old as local government (see section 2.1), and have re-emerged periodically. For instance, the Seebom Committee of 1968 recommended that all 'social services' should be administered by the same local authority, to maximise co-ordination. In the 1990s, concerns emerged that central government departments were promoting initiatives, or funding programmes, that conflicted or overlapped with one another ('silo government').<sup>109</sup> Public bodies' accountability to their sponsor departments "leads to inefficient services and duplication, as each service works only to its own aims and objectives".<sup>110</sup> This causes particular problems for 'individuals with complex needs', who may experience multiple related difficulties but have to interact with organisations that only deal with single issues.<sup>111</sup>

The case is often made that more effective 'joining-up' at a local level would save public money and increase effectiveness – whether through

<sup>106</sup> Cabinet Office, *Better Estate, Better Services, Better Government*, July 2018

<sup>107</sup> See Mark Sandford and Louise Butcher, *The Northern Powerhouse*, House of Commons Library, 2016; Gill Bentley, "Territory, Policy and Governance at Meso-Scale? The Midlands Engine", in Felicia Fai (ed.), *Place-Based Perspectives on the Industrial Strategy*, University of Bath, 2018

<sup>108</sup> IPPR Commission on Economic Justice, *Prosperity and Justice: A Plan for the New Economy*, 2018, p244-6

<sup>109</sup> Service Transformation Challenge Panel, *Bolder, Braver and Better: why we need local deals to save public services*, November 2014, p19

<sup>110</sup> IPPR, *Rebooting Devolution: A Common-Sense Approach to Taking Back Control*, 2017, p7

<sup>111</sup> Sophie Wilson, Nehal Davison, Molly Clarke and Jo Casebourne, *Joining up public services around local, citizen needs*, Institute for Government, 2017, p7; Service Transformation Challenge Panel, *Bolder, Braver and Better: why we need local deals to save public services*, November 2014

devolution of power or better cross-agency relations. There is often a scale dimension to these claims: ResPublica suggest that “larger strategic-level authorities covering bigger geographical areas can be better placed to take the decisions affecting the full range of council services...”.<sup>112</sup> This reflects the concerns of other think-tanks, such as Localis and IPPR, to create a new public body located at a ‘strategic’ level of policy-making (i.e. covering a wider population and geography than existing bodies).

A number of reports suggest that the localisation of policy-making for the commissioning of public services would promote joining-up and public service efficiency. Reform suggest that “local commissioners are best placed to tailor services to the needs of their areas and can integrate service design to meet the multiple needs of service users”.<sup>113</sup> In their proposals, “single commissioning bodies would integrate commissioning functions, allowing commissioners to design policies that improve outcomes across policy areas”, and this should be accompanied by a single block grant to an area.<sup>114</sup> Other publications note that improved partnership working can be achieved without merging organisations into one:

...partners in Leeds have integrated their health and social care staff into new area based teams, enabling integrated service delivery, with expected savings of up to £3 million in the first three years of the new model. In Nottingham, DWP is co-locating its youth employment services with the council, again enabling closer working between partners and an immediate saving of £500,000.<sup>115</sup>

ResPublica propose the devolution of health, employment services, skills and offender management, on the basis that “local commissioners are best placed to design and monitor services which meet the needs of their area”.<sup>116</sup> The RSA’s Inclusive Growth Commission proposes “new social contracts between city regions and central government that commit to specific social and economic outcomes, in return for control over local resources”.<sup>117</sup> This would include combined authorities “to be able to pool budgets and co-commission public services”.<sup>118</sup> Collaborate CIC advocate “a forum of collaborative system leadership...which builds shared understanding of the principles and practice required to achieve the place-based vision”.<sup>119</sup>

---

<sup>112</sup> See Mark Morrin and Phillip Blond, *Devo 2.0: the case for counties*, 2017, p.22

<sup>113</sup> Alexander Hitchcock, Maisie Borrows, Eleonora Harwich, *Vive la devolution: devolved public services commissioning, Reform, 2017*, p6

<sup>114</sup> Ibid., p7

<sup>115</sup> Service Transformation Challenge Panel, *Bolder, Braver and Better: why we need local deals to save public services*, November 2014, p24

<sup>116</sup> Alexander Hitchcock, Maisie Borrows, Eleonora Harwich, *Vive la devolution: devolved public services commissioning, Reform, 2017*, 2017, p.19

<sup>117</sup> RSA Inclusive Growth Commission, *Making Our Economy Work for Everyone*, 2017, 10

<sup>118</sup> Ibid.

<sup>119</sup> Anna Randle and Hannah Anderson, *Building Collaborative Places*, Collaborate CIC, 2018, p21

## Silos and joining-up: previous policies

The existence of ‘silos’ is a recurring debate in British government. The IfG has mapped some 50-60 Government initiatives aimed at *reducing* silos since 1997.<sup>120</sup> Recent examples seek to bring together multiple public bodies working in a defined place, and designing a strategy for them to work together more effectively. Examples include Total Place, Our Place!, and the Troubled Families initiative.<sup>121</sup> The ‘places’ covered range from county areas, to small towns, to ward-level areas within cities. The devolution deal in Greater Manchester has begun to take some steps in this direction, including recent initiatives to co-locate public service provision at a sub-borough level, covering areas with populations of 30-50,000.<sup>122</sup>

An additional dimension of this debate is the concept of pooling public sector budgets.<sup>123</sup> This featured as an aspiration in the Our Place! pilots, but in practice it often ran up against public bodies’ requirements for financial accountability to their sponsor departments.<sup>124</sup> Nevertheless, the aspiration features in recent reports: for instance, Collaborate CIC proposes “collective impact investment principles, meaning that funding models are designed to support the collaborative achievement of shared outcomes across a place”.<sup>125</sup>

The initiatives listed above were pilots and therefore covered only selected areas. They did not address broader questions of ‘appropriate geographies’ for this type of initiative. Any more comprehensive impetus towards local commissioning would likely find this necessary. The IfG state that “it is essential to think strategically about whether certain geographies may help or hinder joining up around local, citizen needs and how this might inform the distribution of powers and functions across the system”.<sup>126</sup>

## 5.4 Increased local accountability

In central government narratives, passing powers to local elected or unelected bodies has been accompanied by provisions to ensure that those bodies can be held accountable. Certain aspects of place-shaping, such as the distribution of funding, could in principle be conducted on an entirely top-down basis.<sup>127</sup> But stronger local accountability frequently appears as a desirable element of a stronger focus on place.

<sup>120</sup> Sophie Wilson, Nehal Davison, Molly Clarke and Jo Casebourne, [Joining up public services around local, citizen needs](#), Institute for Government, 2017, p11

<sup>121</sup> See the Library briefing paper [Community budgets and city deals](#) for more information on these initiatives.

<sup>122</sup> Ruth Lupton, Ceri Hughes, Sian Peake-Jones and Kerris Cooper, [City-region devolution in England](#), SPDO research paper 2, November 2018

<sup>123</sup> Ruth Lupton, Ceri Hughes, Sian Peake-Jones and Kerris Cooper, [City-region devolution in England](#), SPDO research paper 2, November 2018

<sup>124</sup> This issue was raised in the Communities and Local Government Committee’s 2013 inquiry [Community Budgets](#), p25-26

<sup>125</sup> Anna Randle and Hannah Anderson, [Building Collaborative Places](#), Collaborate CIC, 2018, p25

<sup>126</sup> Sophie Wilson, Nehal Davison, Molly Clarke and Jo Casebourne, [Joining up public services around local, citizen needs](#), Institute for Government, 2017, p21

<sup>127</sup> See, for instance, Adam Lent, [“Place-based Policy Making: definitions, drivers and differences”](#), NLGN, 2018, p12

IPPR states that “in theory at least, devolution allows for people... to better hold power to account... to ensure that the voices of those ‘left behind’ by economic growth are listened to”.<sup>128</sup>

‘Accountability’ in practice takes a number of different forms at present. Financial assurance frameworks are applied to both mayoral combined authorities and Local Enterprise Partnerships. MCAs are required to provide an account of the spending of each of the funds that they receive from central government, and to commission independent evaluations of their spending decisions.<sup>129</sup> Although LEPs are not public bodies, their receipt of public funds is governed by an assurance process that requires the head of finance of their ‘accountable body’ (normally a local authority in the LEP area) to certify propriety in the use of funding.

Many think-tanks claim that electoral accountability for local policy-making comes via electing a mayor, as “accountability and ownership of the commissioning of projects is crucial to push services in the same direction”.<sup>130</sup> ResPublica claim that mayors’ public profile “give[s] them significant legitimacy in implementing their political programmes, both informal exercise of power and in ‘soft’ negotiations with other bodies and national government”.<sup>131</sup>

Local accountability may also take the form of investigation, reporting and research by some form of overview and scrutiny committee. This type of structure cannot overrule executive power, but may highlight failings. MCAs are obliged to establish at least one scrutiny committee, made up principally of backbench members of the participating local authorities. The scrutiny committee has powers to demand papers and question MCA staff and membership, but it must also agree its work programme with the MCA leadership.

The Centre for Public Scrutiny has produced substantial guidance for overview and scrutiny within MCAs.<sup>132</sup> They have also led proposals for Local Public Accounts Committees (LPACs), a beefed-up form of place-based overview and scrutiny committee, which would assemble data across all local public services in an area and hold to account those responsible for delivering them, irrespective of which public body they lead. CfPS note that “the geography of local PACs will be important in ensuring their relevance and visibility to local people because we think they are best tackling strategic cross-boundary issues, we think a larger footprint would be more appropriate...”.<sup>133</sup> LPACs are envisioned as accompanying effective strategies of joint working in local areas. This aligns with Collaborate CIC’s vision of a “place-based outcomes

---

<sup>128</sup> IPPR, [Rebooting Devolution: A Common-Sense Approach to Taking Back Control](#), 2017, p7

<sup>129</sup> MHCLG, [Accounting Officer System Statement 2018](#), 2018, pp50-53

<sup>130</sup> Alexander Hitchcock, Maisie Borrows, Eleonora Harwich, [Vive la devolution: devolved public services commissioning, Reform, 2017](#), p50

<sup>131</sup> Mark Morrin and Phillip Blond, *Devo 2.0: the case for counties*, 2017, p45

<sup>132</sup> Ed Hammond, [Overview and scrutiny in combined authorities: a plain English guide](#), 2017

<sup>133</sup> Centre for Public Scrutiny, [Local Public Accounts Committees](#), 2018, p7

framework [that] drives the shared accountability of all local partners".<sup>134</sup>

The Government has also indicated that it sees more effective scrutiny of LEPs as a priority, in its July 2018 consultation paper:

The Government will support Local Enterprise Partnerships to set out how they will ensure external scrutiny and expert oversight, including participating in relevant local authority scrutiny panel enquiries to ensure effective and appropriate democratic scrutiny of their investment decisions...This legal framework and additional detail on assessing performance within the National Assurance Framework will provide a greater level of clarity for all partners...<sup>135</sup>

## 5.5 Future changes

Any future changes to local administrative boundaries in England, in response to these policy concerns, are likely to make use of one or more of the criteria identified in section 2.3 above; and to take into account the concerns identified in section 4. This is equally likely whether future changes are *ad hoc* or comprehensive, and whether the criteria used are made explicit or otherwise.

Furthermore, practice in defining boundaries can vary between one part of a state and another. A defined, comprehensive approach to defining boundaries can accommodate exceptions on various grounds. Examples of these might include islands, large cities, or culturally distinct areas. Globally, many states use administrative boundaries that take account of such exceptions.

The Library will shortly publish a series of maps of areas of England that feature broadly common boundaries in administrative and functional terms, and areas that do not. The aim is to assist in clarifying the varied approaches currently used to identify local 'places': and to examine whether there are areas of England that are used as administrative units more regularly than others.

---

<sup>134</sup> Anna Randle and Hannah Anderson, [Building Collaborative Places](#), Collaborate CIC, 2018, p23

<sup>135</sup> MHCLG, [Strengthened Local Enterprise Partnerships](#), 2018, p21

### About the Library

The House of Commons Library research service provides MPs and their staff with the impartial briefing and evidence base they need to do their work in scrutinising Government, proposing legislation, and supporting constituents.

As well as providing MPs with a confidential service we publish open briefing papers, which are available on the Parliament website.

Every effort is made to ensure that the information contained in these publicly available research briefings is correct at the time of publication. Readers should be aware however that briefings are not necessarily updated or otherwise amended to reflect subsequent changes.

If you have any comments on our briefings please email [papers@parliament.uk](mailto:papers@parliament.uk). Authors are available to discuss the content of this briefing only with Members and their staff.

If you have any general questions about the work of the House of Commons you can email [hcenquiries@parliament.uk](mailto:hcenquiries@parliament.uk).

### Disclaimer

This information is provided to Members of Parliament in support of their parliamentary duties. It is a general briefing only and should not be relied on as a substitute for specific advice. The House of Commons or the author(s) shall not be liable for any errors or omissions, or for any loss or damage of any kind arising from its use, and may remove, vary or amend any information at any time without prior notice.

The House of Commons accepts no responsibility for any references or links to, or the content of, information maintained by third parties. This information is provided subject to the [conditions of the Open Parliament Licence](#).