

20 February 2026

The Rt Hon Steve Reed OBE MP
Secretary of State
Ministry of Housing, Communities & Local Government
2 Marsham Street
Westminster
London
SW1P 4DF

Re: Sequencing and Risk in the Local Government Reorganisation Programme

Dear Secretary of State,

In your letter of 16 February, you confirmed that the May 2026 local elections will proceed and acknowledged the “genuine concerns” raised by councils about delivering what you describe as the most ambitious programme of local government reform in a generation.

Ministers previously argued that elections would be so disruptive to local government reorganisation that postponement was justified. Councils were instructed to plan on that basis, only for the decision to be withdrawn following Reform UK’s High Court legal challenge and subsequent legal advice. Elections are now proceeding, with further elections scheduled in 2027. Having concluded that elections must proceed, the Government must now apply the same judgement to the sequencing of reorganisation.

You were prepared to engage with leaders on the timing of elections. That same engagement is required on reorganisation timeframes. The additional £63m in capacity funding you have announced is welcome, but funding alone does not create the experienced leadership, statutory officers and specialist capability that safe transition demands.

Reorganisation at this scale is inherently destabilising. On the current approach, around twenty areas are expected to reorganise within a single programme cycle, affecting twenty million residents on a single day in 2028, alongside many hundreds of thousands of employees.

This is not administrative adjustment. It requires structural redesign, legislative change, financial harmonisation, workforce restructuring and the transfer of statutory functions across entire systems. It is being undertaken while SEND, adult social care and children’s social care must continue without disruption. These are separate statutory systems protecting vulnerable children and adults, each already under intense safeguarding and workforce pressure.

These changes also coincide with the long-awaited Schools and SEND White Paper and other significant reforms affecting local government. The cumulative effect is material. Simultaneous structural and policy change increases the risk of fragmentation during transition, precisely when continuity of care and safeguarding oversight must remain intact.

Paul Rowsell, who led previous waves of reorganisation within your Department, advised Lancashire leaders that only around three reorganisations per year could realistically be managed safely at any one time. The current programme anticipates delivery at a pace many times that scale. Delivery capacity and continuity of care impose practical limits.

Reorganisation will increase the number of upper tier authorities and intensify demand for scarce statutory leadership, including Directors of Adult Social Services and Directors of Children’s

Services, at a time when recruitment and retention challenges are already acute. While safeguarding duties sit locally, the timetable and scale of reform are determined nationally. Where change is driven centrally and applied simultaneously, responsibility for assessing and managing safeguarding risk cannot be delegated downward.

Our priority, as should be yours, is the safe transition of essential services for the most vulnerable in society. Where change is rushed or poorly sequenced, individuals can fall through gaps in accountability. In services of this nature, that risk concerns the safety and wellbeing of children and adults who depend on the state for protection and care.

Elections must proceed. The choice is therefore clear: either the programme proceeds unchanged alongside fixed electoral cycles, or the Government revises the pace and sequencing of reform.

I therefore ask that you:

1. Publish the Department's updated risk assessment in full, including the assumptions underpinning the interaction between reorganisation milestones and the 2026 and 2027 election cycles.
2. Confirm unequivocally whether the programme will proceed unchanged on its current timetable, or confirm that the Government will revise the timetable.
3. Publish in full the legal advice relied upon in withdrawing the postponement decision and confirm that the Government will not seek to revisit or postpone the 2027 local elections.

Millions of residents and hundreds of thousands of public servants will be affected by these decisions simultaneously. They are entitled to clarity about the timetable and about where accountability lies.

Yours sincerely



Cllr Stephen Atkinson

Reform UK Group Leader, Local Government Association
Leader, Lancashire County Council