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**Ministry of Housing, Communities &  
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2 Marsham Street  
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Chief Executives of Gloucestershire  
Councils

19 May 2026

Dear Chief Executives,

I am writing to seek your views on matters that will be necessary for the Secretary of State to consider in any Structural Changes Order (SCO). The final decision on all these matters, including whether to implement a proposal, with or without modification, lies with the Secretary of State. Seeking your views is without prejudice to whether the Secretary of State decides to implement a proposal.

For the matters below, we would appreciate your response by **Tuesday 16 June**, and if you are able to provide an earlier response this would be appreciated. This is so the Secretary of State can consider and take decisions on these matters after he has taken decisions on which proposal, if any, to implement, with or without modification. These decisions will then be shared alongside the announcement of any reorganisation decision, which we expect to make before summer recess. While all views expressed will be considered, it is ultimately for the Secretary of State to decide what to include in the legislation to ensure any new councils are well placed to go live and to implement the proposal that is chosen.

We encourage you to work together to seek to agree representations for each proposal that would affect your councils for the Secretary of State to consider. You can respond singly, jointly, or as a collective, to [LGRorganisation@communities.gov.uk](mailto:LGRorganisation@communities.gov.uk) and to your delivery lead ([emma.reed@communities.gov.uk](mailto:emma.reed@communities.gov.uk)). Even if agreement cannot be reached, we encourage you to discuss your thoughts with each other. If you are unable to provide a view at this stage on any of these matters, it would be helpful if this could be set out so it can be considered by ministers.

### **Interim implementation structures**

In the event of a decision to reorganise, a SCO will provide for the creation of a new single tier of local government for the area. This could either be through the creation of an entirely new council, or by establishing the new council as a continuing authority of one of the existing councils – known as a preparing council. Our current view is that a preparing council will only be considered where there is an existing council on the same geography as the new unitary council. We understand there is interest from some in whether a preparing council model is possible where the geography is very similar – if you think this could apply then your thoughts on democratic accountability and other practical considerations in the transition period in this model would be welcomed.

In advance of elections, the SCO requires the establishment of joint committees for each new council, or an implementation executive for any preparing council. Once elections are held – expected to be on 6 May 2027 – the executive of the shadow council or preparing council is empowered to make preparations for the new council to go live and provides direction to the implementation team. The SCO places duties on all councils to cooperate as a key principle, and it is important that transitional arrangements for reorganisation is a shared endeavour. The transitional responsibilities are set out in the [Implementation Bodies guidance](#) published on 12 March.

The SCO specifies, for each new unitary council, the membership of the joint committee/s or implementation executive. The SCO could, but does not have to, specify who is to be the Chair and could specify provisions around political balance. The joint committee/s and implementation executive would have a time and purpose limited existence given the expectation in this round of local government reorganisation that elections take place 11 months before any new unitary councils go live.

The SCO requires that an officer implementation team consisting of officers of all affected councils across the invitation area would be formed to support the implementation of the proposal through the entire transition. The SCO would specify particular roles, such as the Lead and Deputy Lead.

### **Elections**

The SCO specifies the returning officers for the first election to each of the new unitary councils created. The SCO could also align parish council elections with the elections to the new councils.

### **Names**

The SCO lists the councils that will be abolished and names new unitary councils. To support the timetable described above, we anticipate that decisions will be taken on naming new councils at this stage, with Ministers being guided by the information in proposals and your representations. For the avoidance of doubt, the names announced will be included in the SCO. However, it should be noted that existing legislation provides for a council to change its legal name, and councils do choose to operate with an alternative name for branding purposes.

### **Councillor numbers and warding arrangements for the first election**

The SCO will include a schedule setting out warding arrangements and the number of councillors for each new council for the first election. We anticipate these councillors will be elected for an initial term of five years subject, of course, to Ministerial decision. While councillor numbers were included in proposals, we appreciate this may have been further refined as more detailed modelling work on warding has been undertaken. If this is the case, please do confirm your proposed councillor numbers and any rationale for this to support the Minister's final decisions on the content of the SCO. We will need any further representations on numbers by 16 June at the latest, and ideally earlier.

With regard to your suggested warding arrangements, these can be based on any combination of existing wards, divisions and parish boundaries. We understand there may be significant work compiling this, and that you may wish to wait until after a decision on which proposal is to be implemented to finalise this work. We will need any further information on warding by **17 August** and would appreciate receiving it before this date wherever possible.

We would encourage you to consider the Local Government Boundary Commission for England's guidance, as set out on their [website](#) and in our joint webinars last year as a good place to start while drawing these up, while recognising that the usual criteria are unlikely to be met in the same way as a full review. The Commission can offer advice and guidance as you draw up these boundaries. Please do reach out to them directly if you have not already. The Commission expects to carry out an electoral review of all newly established councils after their first elections and before their subsequent elections.

### **Ceremonial matters**

With regard to historic and ceremonial matters, we understand the importance of these and will work closely with you through the transition period to ensure these are preserved. Many matters are covered by generic regulations, or local agreements you may choose to make. Any matters requiring legislative provision, such as the establishment of Charter Trustees in unparished areas, or amendments to the Lord Lieutenancy, are normally provided for through a supplementary "mop-up" order that brings together localised and place-specific arrangements once the SCO has established the new governance framework. This approach has been used successfully in previous reorganisations, including in Cumbria, and is the approach we are taking in Surrey, and ensures historic rights and privileges are preserved while allowing the main Order to focus on the transition to new unitary arrangements. If there are any particular issues that we should be aware of, please do reach out if you have not already done so.

### **Timetable**

The SCO is subject to the affirmative procedure and usually takes six to nine months to prepare and take through Parliament, depending on the complexity. As an indicative timetable, we hope to draft the SCO over the summer, with a version shared in the autumn for fact checking, before sending the Order for pre-legislative scrutiny and laying in Parliament around the end of the year.

### **Questions**

In summary, for each proposal these are the questions for you to consider for 16 June or before:

- Whether you would prefer a preparing council and implementation executive model (where geographies align) or a new council model with a joint committee?
- How many members from each relevant council would you prefer to sit on each Joint Committee or implementation executive, including the balance of members from different councils?

- Would you prefer for any individuals to be specified for the Chair/Deputy Chair roles, and if so, who?
- What are your views on any requirement for political balance in the implementation executive/joint committee(s)?
- What would be your preferences for the membership of the Implementation Team and whether roles should be specified?
- Who should be the returning officer for the first election to each of the new unitary councils, that proposals would see established? (We anticipate that the SCO would specify the role at a particular council rather than an individual person)
- Confirm if you would prefer the SCO to align future parish council elections with those of the new councils and set out when parish council elections currently take place across the four year electoral cycle for each of the new council areas?
- What are the current legal names of the councils and what would be your preferred names for new councils?
- If different to proposals, has there been any further modelling of your preferred councillors for each new council that you would like the Secretary of State to consider, alongside any information on the rationale for the numbers?

**For 17 August or before:**

- What are your suggested wards, that reflect the proposal and councillor numbers decided, and that best meet the LGBCE guidance, for inclusion in the SCO?

We have attached some information that sets out how this has been done previously along with links to relevant SCOs including Surrey. We would again emphasise that decisions will be taken for each area taking account of the representations across all proposals in an area and other relevant matters.

We are happy to meet to discuss these matters or for you to share initial views [further to our meeting on 14 May ]. We would like the ideas that you share with us by 16 June 2026 to have political endorsement; accordingly, we ask that this letter is shared with Leaders.

Yours sincerely,



Ruth Miller  
Deputy Director, Local Government Reorganisation