

Alison McGovern MP

Minister of State for Local
Government and Homelessness
Ministry of Housing, Communities
and Local Government

Harlow Council

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Thursday 15th January 2026

Dear Minister,

Thank you for your letter of 18 December 2025 inviting councils to set out their assessment of local capacity to inform the Secretary of State's decision on whether postponement of the May 2026 local elections would be appropriate in the context of Local Government Reorganisation (LGR).

This letter sets out Harlow Council's formal response for that purpose. The council recognises fully that the decision rests with the Secretary of State and thus, the sole interest in this representation is what is in the best long-term interests of Harlow, its residents, the sustainability of local services, and compliance with the legislative framework for LGR.

The programme of LGR is unprecedented in its scale, pace, and complexity. It involves the abolition of existing councils, the establishment of new unitary authorities, and the comprehensive redesign of governance, financial, workforce, ICT, legal, contract, landlord, and democratic functions responsible for stewarding billions of pounds of public expenditure each year. These changes represent a fundamental restructuring of how local public services are governed, funded, and delivered.

This is a complete programme of structural reform being delivered to an exceptionally ambitious timetable. Over the coming year, Harlow Council's capacity and resources will be profoundly affected by the simultaneous demands of maintaining essential services, delivering a once-in-a-generation programme of renewal, and preparing for the transition to the new unitary authority under LGR. The council will be required to mobilise extensive internal and external resources, placing unprecedented pressure on senior and operational teams. The risks, necessary mitigations, and implications for capacity are clear and unavoidable.

The Government has also been clear that LGR is intended to strengthen local leadership, support economic growth, and improve service delivery, while recognising the central role of local authorities in driving growth and renewal that residents can



see and feel. This is precisely what Harlow Council is currently delivering, and these capacity challenges come alongside the transformative change already underway in the town.

Harlow Council has been relentlessly focused on a once-in-a-generation renewal. To put the scale of this into context, the council is managing, delivering, and leading development of the fastest-growing area in the country, directly delivering the largest regeneration programme of any district council in the UK including the complete rebuilding of the town centre, and supporting multi-billion-pound government and private sector investment. All of this is being achieved while implementing major legislative changes, including private sector housing enforcement, housing targets, waste collection reforms, and social housing regulation.

In 2026 alone, Harlow Council is delivering more regeneration projects - both in capital value and project complexity - than at any point since its inception in 1974. As the largest social housing landlord in the East of England, the council is investing in its homes on a scale never seen before. This year alone, Harlow Council is investing more in its housing than it did in the seventeen years between 2005 and 2022 combined.

It is clear that the sheer scale of what Harlow Council's resource is delivering, alongside improving critical service delivery, is unique.

The capacity challenge of delivering LGR alongside local elections is widely recognised. There is clear precedent for postponing elections in councils proposed for abolition: in every previous programme of reorganisation, elections to such councils have been deferred. In those cases, consideration was often given to the value for money of holding elections for councils that were imminently to be disbanded, with resources instead focused on ensuring residents could vote for new authorities as quickly as possible.

Between 2019 and 2022 alone, the Government postponed, cancelled, or otherwise impacted elections in the following councils in order to enable LGR: Aylesbury Vale District Council, Chiltern District Council, South Bucks District Council, Wycombe District Council, Buckinghamshire County Council, Allerdale Borough Council, Barrow-in-Furness Borough Council, Carlisle City Council, Copeland Borough Council, Cumbria County Council, Eden District Council, South Lakeland District Council, Dorset County Council, Christchurch Council, East Dorset Council, North Dorset Council, Purbeck Council, West Dorset Council, Weymouth and Portland Council, Corby Borough Council, Daventry District Council, East Northamptonshire District Council, Kettering Borough Council, Northampton Borough Council, Northamptonshire County Council, South Northamptonshire District Council, Wellingborough Borough Council, Craven District Council, Harrogate Borough Council, North Yorkshire County Council, Richmondshire District Council, Ryedale



Borough Council, Scarborough Borough Council, Selby District Council, Mendip District Council, Sedgemoor District Council, Somerset County Council, Somerset West and Taunton Council, and South Somerset District Council.

It is Harlow Council's view that this case should be treated no differently - particularly given that the scale and complexity of Harlow's responsibilities are indisputably greater than many other councils previously affected by LGR.

Residents may rightly raise questions about democratic accountability and electoral mandate in the context of LGR. In Harlow, however, the democratic position is clear. Residents are set to vote in 2027 for a new shadow unitary authority, in 2028 for a Mayor and Combined Authority, and in 2029 at the next General Election. The most recent election to Harlow Council took place in May 2024, when all 33 councillors were elected (with the exception of one by-election in 2025). As a result, no councillor in Harlow has yet served two years in office. Unlike many council areas that have made representations, no extension to any current councillor term would occur if the May 2026 district council elections were postponed. In fact, even if the current term continued until the council's proposed abolition in 2028, no councillor would exceed the standard four-year term that applies across English local government. By the time residents vote for the new shadow unitary authority, current Harlow councillors will have served only three years.

In these circumstances, Harlow Council retains a clear and recent democratic mandate, and postponement of the May 2026 elections would not undermine democratic legitimacy.

If district council elections were to proceed in 2026, they would be for only 11 council seats. However, the organisational and governance implications of holding those elections would be the same as for a full election cycle. The statutory pre-election period, the impact on discharging executive functions, and the reconstitution of governance arrangements inevitably affect resources, capacity, and outcomes. Many councils note that this impact extends for several months and would directly impede operational capacity during the final year leading up to the formation of the new shadow unitary authority. As a result, a third of councillors would be elected to a council proposed to be abolished shortly thereafter, while the full impact on the council's capacity to deliver LGR and its existing programmes would still be felt.

Harlow Council has carefully considered the criteria outlined in your letter, drawing on both internal and external advice. The Government has also noted that there is no single definition of local capacity; rather, councils are expected to assess capacity constraints in order to meet the LGR timetable.

Considering all material factors, the council formally requests that the Secretary of State postpone the Harlow Council elections for the 11 seats currently scheduled for



7 May 2026. In doing so, essential capacity will be released to safely and effectively fulfil the legislative framework for LGR. This request is submitted in response to the Government's invitation for representations, with full acknowledgment that the decision rests with the Secretary of State.

The council remains resolutely focussed on Building Harlow's Future and delivering the once-in-a-generation change our residents deserve.

With every good wish,



Cllr Dan Swords
Leader of Harlow Council