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How “Northern European” is Japan’s Municipal Merger Policy?

Sven KRAMER

Abstract

The Meiji Restoration of 1868 marked the start of the modernization of Japan to a unitary nation-state. This included the modernization of the municipal system. In 1889 the Japanese government enacted the *shi-sei* (City Code) and *chōson-sei* (Town and Village Code), which were modelled after Prussian counterparts. At the same time and unlike in Prussia, municipal mergers became an integral part of local politics. Three nationwide so-called “great mergers” have occurred to the present day. Implementation of large-scale municipal mergers has been defined as the “northern European model” of local government boundary reform in Western scholarship. This can easily be debunked as a very Eurocentric term when taking Japan into account, especially since Japan began its merger program more than 50 years earlier than Sweden, one of the two typical countries named when discussing the “northern European model”.

Introduction

In the 2000s Japan reduced the number of its municipalities (*shi-chō-son*) during a process called “*heisei no daigappei*” (“great merger of the Heisei era (1989-2019),” henceforth abbreviated as GMH). Research on this topic has been broadly conducted in Japan in various fields.(1) GMH reduced the number of

municipalities from 3,229 to 1,718[2].

However, GMH was not the first nationwide municipality merger policy; it was the third one. The first one is called "*meiji no daigappei*" ("great merger of the Meiji era (1868-1912)," henceforth abbreviated as GMM), which occurred in 1889 after the establishment of modern municipalities by two laws called *shi-sei* (city code) and *chōson-sei* (town and village code). Before that, with a few exceptions, essentially every of the 71,314 localities of that time was a municipality. The GMM reduced this number to 15,859 by uniting many small towns and villages under one new local government. Japanese sociologist Suzuki Eitarō established the term "administrative villages" (*gyōsei-son*) for these new municipalities in 1940, in contrast to the term "natural village" (*shizen-son*) referring to every single locality.[3] Today those "natural villages" are often retained as *aza* inside larger municipalities. This is not a type of municipality or any other kind of self-governing body, but a term that indicates that the neighborhoods classified as such were municipalities prior to the GMM.

The second nationwide great municipal merger is called "*shōwa no daigappei*" ("great merger of the Showa era (1926-1989)," henceforth abbreviated as GMS) and was conducted from October 1953 to September 1956 under the *chō-son gappei sokushin hō* (Law for Accelerating the Amalgamation of Cities, Towns, and Villages). The GMS reduced the number of municipalities from 9,868 in 1953 to 3,975 in 1956. Mergers continued until summer 1961, which reduced the number of municipalities to 3,472. The GMS can be considered a part of the postwar reforms in Japan, since the impetus for it lies in the postwar reforms of Japanese local government in 1947.

In Japanese academia the GMS has been broadly discussed as a centralistic and undemocratic policy designed as a step back to prewar centralism.[4] The reform of 1947 tried to reduce centralism in Japan's local government by empowering the *shi-chō-son* against the central government and the prefectures. Since in

many cases municipalities could not choose to merge or not, the GMS has been criticized as centralistic. It was furthermore criticized as undemocratic because in numerous cases merger was forced on municipalities regardless of the will of locals and the reduction of municipalities also reduced the number of local assemblies, which were supposed to represent local residents politically. After a merger one assembly member would have to represent a much larger number of residents.

The first and second section of this paper provide an overview over the development of the modern Japanese municipal system and its major reforms from 1868 until 1961. They shall provide a comprehensive overview of the historical development of the Japanese system of local government from the Meiji Restauration until the end of GMS with focus on municipal mergers. Kurt Steiner(5) already provided a comprehensive overview of the Japanese local government from the Edo period until the 1960s in English, which is why this paper's analysis omits explanations that are unrelated to municipal mergers. It aims to show, that nationwide municipal mergers are a crucial part of Japan's system of local government since the 1880s.

This is also important from an international point of view, especially when compared to European nation-states, after which Meiji Japan modelled itself. European countries also started to conduct large scale municipal mergers since the second half of the 20th century (northern Europe) or the early 21st century (parts of southern Europe). A trend towards large-scale municipal mergers is described as the "northern European model", whereas refraining from such policy as the "southern European model" of municipal (boundary) reform.(6) The typical countries of both models (Sweden, Denmark, the United Kingdom, France, and Italy) as well as Germany will be discussed in Section 3. From this viewpoint Japan can be seen at the forefront of an international trend, that took off many decades after Japan started to embrace it. Furthermore, it begs the question if it is appropriate to

call a policy of embracing large-scale municipal mergers “northern European”.

1. The development of the Japanese municipality structure from 1868 to 1945

Since the Meiji Restoration Japanese municipalities faced two decades of great changes. Most notably was the announcement of *shi-sei* and *chōson-sei* in 1888, because it completed the creation of the modern Japanese municipality system. The three basic municipality types of *shi* (“city”), *chō* (also *machi*, “town”), and *son* (also *mura*, “village”) were established, and during the postwar reform process even retained. Furthermore, their introduction triggered the GMM, which had a huge influence on the overall number of municipalities of the country except for Hokkaido, where at the time most Japanese / non-Ainu localities were new, and thus had almost none of the premodern Japanese village structure to begin with.

1.1. The creation of the modern Japanese municipality structure in the first half of the Meiji era, 1868-1888

Establishing a modern municipality structure in Japan included the process of abolishing the system of the Tokugawa era (1603-1868) and reorganizing its remains into a new system. The system of the Tokugawa era was centered around social interactions of villagers, which was manifested in a status system (*mibun-sei*) and – in rural areas – the village contract system (*murauke-sei*, a collective tax system). However, this “system” had completely different forms depending on different local areas.(7) This local divide of the premodern system lays in the nature of the “feudal”(8) (*bakuhan*) system of Tokugawa Japan. Besides the lands that were directly under Tokugawa rule there extisted more than 200 fiefdoms, which ran their own local systems.

In January 1868, the new Meiji government confiscated the lands of the

Tokugawa family and declared them "Imperial lands" (*tenryō*).[9] Later the Meiji government also confiscated the lands of all fiefdoms, abolished them and turned them into prefectures. In April 1871 the Meiji government enacted the Family Registration Law (*koseki hō*) and abolished the old system of village officials with it.[10] In October 1872 the "large and small administrative districting system" ("*daiku shōku sei*") was introduced.[11] The large districts had a size similar to the old counties (*gun*),[12] and the small districts had a size similar to a few towns and villages combined, but these districts did not have the traditional names of the respective counties and localities. Instead they had only numbers (e.g. small district four of large district one, etc.). Putting several premodern villages into one small district sounds much like municipal merger, but it was not, because every village retained an autonomous village administration. It rather meant that villages were still basic units of administration, which were only put beneath a new larger one. One characteristic of that time was, that the ministry of the interior (*naimushō*) was not in favor of municipality mergers.[13]

The "large and small administrative districting system" and the introduction of prefectures seemingly turned the premodern patchwork of different systems of local administration into one unified one, but that was not the case, as Matsuzawa argues.[14] That is, the implementation of the "large and small administrative districting system" laid in the hands of the prefectural governments, and it was not a unified system solely implemented by the central government.[15]

The next step of the reform process was the implementation of three new laws to create a new unitary system. Those laws were the "Organization Law of Counties, Districts, Towns, and Villages" (*gun ku chō son hensei hō*), the "Prefectural Assembly Regulation" (*fuken-kai kisoku*), and the "Local Tax Regulation" (*chihō-zei kisoku*). Those were announced in July 22, 1878, and gradually implemented during 1879. The most significant to the municipality system was the first one, since it abolished the large and small districts, and reactivated

the old counties, towns, and villages as sole basic units of local government. The additional "districts" of this system were the predecessors of the later "cities" (*shi*), i.e. units of local government in urban areas that were thought of as urban counties. As institutions of local government, county offices (*gun'yakusho*) were established in counties, and *kochō* ("household chief") offices (*kochō yakuba*) in towns and villages. It was also possible to establish "joint *kochō* offices" (*rengō kochō yakuba*) which were in charge of governing multiple towns and villages.(16) This reform also handed over the power of the purse to local councils.(17) That was, what made these new political units different from their counterparts of the Tokugawa era. It was the start of new administrative villages, but except for villages that already conducted municipal mergers, these "early administrative villages" were identical to the "natural villages." However, that system was only short-lived.

1.2. *shi-sei*, *chōson-sei*, and GMM

Another reform took place in 1888. It was the introduction of the *shi-sei* and *chōson-sei*, which became the legal foundation of the Japanese system of municipal government until 1947. *Shi-sei* and *chōson-sei* were drafted under the advice of Albert Mosse, a lawyer from Prussia which was the dominant constituent state of the German Empire. His proposals introduced the municipal unit of *shi* ("city"), which did not exist before. Like the *kreisfreie Städte* of the Prussian system, *shi* are basic urban municipal units with a certain minimum population, and are not below counties but on the same level.(18) The major difference between them and the *ku* was, that in general no other units remained below them.

Shi-sei and *chōson-sei* led to a relative stability in the Japanese modern municipality system – they were in use from 1888 until 1947 – and completed the modernization of the system. Not only the *shi-sei* and *chōson-sei*, but also the *gun-sei* (county order, the similar law concerning counties) and *fuken-sei* (prefecture

order, the similar law concerning prefectures) were enacted in the same decade, and those were modelled after Prussian models as well.[19] Because of that, the modernization of Japanese local government was a kind of "Germanization", but there were two significant differences. The cities, towns, and villages had the same rights and powers, and were only different in population size.[20] On the other hand, in Prussia, towns and villages belonging to counties only managed basic administrative services, while anything else was administered by the county. The other difference was that Japan conducted a major nationwide municipal merger in the process of introducing the *shi-sei* and *chōson-sei*, whereas Prussian municipalities had not experienced large scale municipal mergers yet. The execution of that merger can be seen as the greatest difference between the municipal systems of Prussia / Germany and mid-Meiji era Japan and it was carried out decades earlier than anything similar in Europe.

The GMM occurred directly after the public announcement of the *shi-sei* and *chōson-sei*. Most mergers happened in 1889. The GMM was centrally conducted by the Ministry of the Interior and reduced the number of municipalities from 71,314 to 15,859, which was the largest reduction of all mergers. The introduction of the *shi-sei* and *chōson-sei* and the enactment of the GMM were part of a series of reforms that accompanied the introduction of the Constitution of the Empire of Japan. On June 13, 1889, the Ministry of the Interior officially declared the preparation of municipal mergers, and declared that the standard size of any municipality should be at least 300 to 500 households. It also declared, that municipalities with a joint *kochō* office should merge into one new municipality in order to retain the cooperation of already cooperating municipalities.[21] The GMM was a centralistic measure and was executed by force in many cases.[22]

1.3. The development of the municipality structure from the 1890s to 1945

Besides several amendments to the *shi-sei* and *chōson-sei* the largest reforms

from 1890 until 1945 were the abolition of the *gun-sei* (county code) and the founding of Tokyo Metropolis (Tokyo-*to*) by merging the old Tokyo Prefecture (Tokyo-*fu*) and Tokyo City (Tokyo-*shi*). There were no large scale nationwide municipal mergers, but occasional mergers occurred throughout that period. Because of those mergers, the number of municipalities dropped down to 10,520 by 1945.

After entering the Taisho era (1912-1926), the *gun-sei* was abolished. This was a reform which stripped the counties from their function as units of local government. After that, counties survived only as toponyms. The abolition of the *gun-sei* strengthened the role of towns and villages,(23) but it was also the cause for the "Municipal Merger of the Taisho Era" (*taishō no chōson gappei*).(24) This merger was not a "great municipal merger", because it was not a centrally planned and conducted nationwide merger policy. It was a temporary increase in voluntary mergers.

During World War II, municipal mergers were frequently used as a proposed means to strengthen the defensive abilities of the country. The central government suggested that mergers would strengthen the administrative abilities of municipalities during an invasion.(25) This policy also had the evacuation of the biggest cities in mind. For example, in case of an evacuation of Osaka, its population would have to be redistributed around the country into smaller cities and towns of the hinterland. Municipal mergers in advance should prepare those rural places for the influx of evacuated residents of large coastal cities. Other justifications for these war time mergers were, 1st: making places with military industries more efficient, 2nd: making the construction of infrastructure relevant to the military, like roads and harbors, more efficient, 3rd: suitable distribution of the population and self-sustenance with food in case of an invasion of the homeland.(26) In other words, municipal mergers during World War II belonged to the overall group of military policies.

2. The postwar development from 1945 to 1961

World War II officially ended with Japan signing the declaration of surrender on September 2, 1945. As it is generally known, Japan was allowed to retain its own government, but during the allied occupation political decisions had to be approved by SCAP (Supreme Commander of the Allied Powers). Perhaps the most important postwar reform was the replacement of the Constitution of the Empire of Japan by the Constitution of the State of Japan. At the same time, the *shi-sei*, *chōson-sei*, or *fuken-sei* and other laws concerning local government were abolished and replaced by the *chihō jichi hō* (Local Autonomy Law). In other words, the multiple prewar laws concerning this topic were replaced by one law covering all units of local government.

2.1. The postwar reforms: A new constitution and the *chihō jichi hō*

One aim of the *chihō jichi hō* was to decentralize power by giving prefectures and municipalities more power adverse central government compared to the pre-1947 order. However, political scientist Ichikawa Yoshimune argues, that the time of the decentralization process from 1945 to 1950 was actually a period of functional centralization (*kinō-teki shūken-ka*), because local governments could only exercise the administrative tasks allocated to them by the central government.(27)

The changes in local governance after the implementation of the *chihō jichi hō* were governed by three principles. They were, 1st: expansion of civil rights, 2nd: enforcement of the autonomy of bodies of local government, 3rd: systematization of proper policies and the principle of efficiency.(28)

The *chihō jichi hō* was the centerpiece of the reforms in the municipality system, but there were also other things that influenced this reform. The two with the strongest influence besides the *chihō jichi hō* were the introduction of municipal police and the extension of the period of compulsory education. Municipalities

with more than 5,000 inhabitants had to maintain their own police force,[29] and the junior high schools of the new system (*shinsei chūgakkō*) became part of compulsory education, which meant that every municipality had to maintain at least one junior high school. This increase in the number of municipal facilities became a main cause for the postwar municipal fiscal crisis.[30] Although these increases were intended to promote decentralization, former Japanese high official and cabinet member Miyazawa Hiroshi has pointed out, that Japan did not become decentralized, but is still highly centralized, with municipalities heavily relying on the central government, just as in prewar times.[31]

Although the first few years of postwar Japan were a time in which the system of local government saw some major reforms, those reforms failed the initial goal of decentralizing Japan. Under the *chihō jichi hō* Japan retained its centralistic character as a typical unitary country. Furthermore, those reforms caused major municipal fiscal crises, which became the major cause for planning and conducting the GMS.

2.2. The GMS: the creation of the postwar municipal boundaries

Before conducting the GMS, two different commissions discussed their proposals to solve the overall municipal fiscal crisis. Those proposals were announced with the Shoup[32] Report (*Shaupu kankoku*) and the Kanbe[33] Report (*Kanbe kankoku*).

The Shoup Report's proposals followed three principles: 1st: redistribution of local power from the prefectures to the municipalities, 2nd: redistribution of administrative tasks between national government, prefectures, and municipalities, and making clear which task belongs to which administrative body, 3rd: giving municipalities a unique source of income.[34]

After the publication of the Shoup Report, the central government established the Investigative Commission on Local Administration (*chihō gyōsei chōsa iin*

kaigi), which is also called the Kanbe Committee. The Kanbe Committee published the "Report on the Redistribution of Politics and Administration" (*gyōsei jimu sai-haibun ni kan-suru kankoku*, generally known as the Kanbe Report) in 1950. It covered the redistribution of many different administrative tasks like education, welfare, hygiene, labor, agriculture, forestry, fishing, commerce and industry, transportation, construction, and miscellaneous. The Kanbe Report treated municipalities as follows: The central government established the Kanbe Committee in December 1949, to research ways how to put the Shoup Report into actual policies. It suggested that municipalities would have to adopt a new system and that it would be necessary to adapt their size accordingly.(35) In January 1951, the central government sent a memo to every governor to conduct research on the "suitable size of municipalities", and the prefectures of Kanagawa and Saitama were the first to conduct that research.(36)

However, creating municipalities that could solve their financial problems on their own was not the only goal of the GMS. Mishima Kazumi, the general manager of Fukuoka prefecture (*Fukuoka-ken sōmu buchō*) in 1953, claimed that it also had the goal of getting rid of the prewar system of local government.(37) That point of view saw the GMS as a deconstruction of the old system. However, that point of view can be countered with the fact that the prewar system was already deconstructed – at least legally – by the *chihō jichi hō*.

The GMS began in October 1953. The average population of all municipalities prior to it was 5,117.(38) The central government established the headquarters for accelerating the amalgamation of cities, towns, and villages (*chōson gappei sokushin honbu*) which centrally planned those mergers. Furthermore, every prefecture also established its own planning headquarters, which planned mergers based on the prefecture's individual circumstances.

During the height of the GMS (1953-1956) the total number of municipalities decreased from 9,868 to 3,975. After the annulment of the *chōson gappei sokushin*

hō, the number of small towns and villages, that refused merger was around 1,000[39] which meant that the goal to get rid of them all was not reached. The central government continued the municipal merger policy under the *shin shi-chō-son kensetsu sokushin hō*. During that time, the principle of municipal mergers changed from mere "rationalization of municipalities" to the creation of new industrial cities (*shin sangyō toshi*). Because of that, the GMS was valued to be one prerequisite for the period of Japan's high economic growth (*kōdo keizai seichō*).[40] Furthermore, during the time of high economic growth, the motorization of Japan increased, which made travel over longer distances easier for an increasing number of people.[41] In other words, the increasing motorization enlarged the daily life area (*seikatsu-ken*) of residents, which increased the possibility that the whole area of one "administrative village" would become the area of daily life. Nevertheless, the GMS was not the last great merger of postwar Japan. The GMS has been considered only the first stage of postwar municipal merger policy.[42] As Yoshioka Kenji points out, the main goal of the GMS was basically the same as the GMM,[43] which was solving fiscal problems by "rationalizing the size" of municipalities and "making local government more efficient". In both cases, those two goals were set by the central government, making both policies highly centralistic.

3. Municipal merger policies in six Western European countries

As discussed above in section 1, Japan modelled its modern system of municipal government after those in Western countries, most notably Prussia / Germany. It also immediately led to the first large-scale Japanese municipal merger. This did not just change the Japanese municipalities in terms of organization but also scale. Furthermore, as discussed in section 2, another large-scale municipal merger policy was carried out after World War II in the 1950s. How does the Japanese

approach towards municipal mergers compare to European countries, especially Germany, which played such a vital role in the creation of modern Japan's local government?

Considering scale of municipalities and the reform of their boundaries, European countries have been grouped into two blocks: a "northern European" one consisting of countries with predominantly large-scale municipalities after at least one large-scale merger policy and a "southern European" one with predominantly small-scale municipalities. The "northern European model" with the example of two Nordic countries as well as the United Kingdom as the non-Nordic typical country applying the "northern European model" is going to be discussed first. The "southern European model" with the example of France and Italy will be discussed afterwards. Finally, the situation of Germany, the country which played the most vital role in the modernization of Japanese local government, will be discussed as a country, which approach can be classified as mixed, i.e. depending on each federal state.

3.1. Sweden and Denmark

Sweden and Denmark are parliamentary monarchies. Both countries are unitary. Local governments are responsible for 50 to 60 per cent of the total public outlays, which amounts to more than 50 per cent of GDP, and it has become the most important implementing agency of welfare state programs. This is a change from the situation directly after World War II and led to widespread reforms of local government in Sweden and Denmark in the 1960s and 70s.(44) Both countries greatly reformed their local governments, but in Sweden it took several decades to reform gradually, whereas Denmark's reform was a swift break with the past, reforming everything in a short amount of time during a time, when Sweden was already in the late stages of its reform processes.(45) Furthermore, Sweden's merger served as the precedent model for similar policies in the other Nordic countries.(46)

Sweden has two tiers of local government consisting of municipalities and counties. Municipalities provide most public services including planning, social welfare, housing, anti-pollution activities and more. Counties do not have supervisory authority over municipalities. They just provide different public services like hospital maintenance and other public health services.(47) Main sources of revenue for Swedish local governments are a proportional income tax and fees.(48)

Swedish municipal mergers were planned since the late 1940s and were carried out since 1952 in two waves. The first wave in 1952 reduced the number of municipalities from about 2,498 to 1,037.(49) That number dropped further down to 848 until 1962,(50) when the second wave started, that went on until 1973. Goal of the second wave was the elimination of municipalities with less than 8,000 residents. Only 282 municipalities were left after 1973.(51) This meant a reduction of about 88 per cent compared to the number of the early 1950s. The second wave focused on letting municipalities merge voluntarily with each other throughout the 1960s, but only half of the municipalities merged that way. The rest was merged by governmental order in 1973.(52)

Denmark's local governments are also responsible for a wide range of public services.(53) In the middle of the 1960s, its two-tier local government system contained counties and municipalities. Municipalities existed in two forms: rural and urban, which was similar to the situation in Japan and Germany. Denmark consisted of 25 counties and 1,388 municipalities, out of which 86 were urban. Until 1974 the distinction between rural and urban municipalities was abolished and their total number reduced to 275. This reduction of municipalities was the second highest after Sweden. Denmark also conducted a county merger, which reduced their number from 25 to 14 between 1965 and 1970.(54) From 2004 to 2007 another reform reduced the number of municipalities from 237 to 65 and replaced the 14 counties with five regions.(55)

In summary, in both Sweden and Denmark municipalities are in charge of

providing a wide range of public services and welfare. Both conducted large-scale municipal mergers, but Sweden was the forerunner with its reform in 1952, creating the blueprint for the reforms in other Nordic countries like Denmark. The first Swedish wave of mergers was thus carried out at the time of the GMS, the second Japanese nationwide wave of municipal mergers. The other reforms happened later in the late 1960s and 1970s, when most of north-western Europe exercised nationwide municipal mergers to some degree.

3.2. United Kingdom

Another example of the "northern European model" is the United Kingdom. It is a parliamentary monarchy and consists of four constituent countries (England, Wales, Scotland, and Northern Ireland). This subsection concentrates on the situation in England with occasionally mentioning the situation in Wales and Scotland, omitting a discussion of the situation in Northern Ireland since it diverges significantly from the other constituent countries since the early 1970s and because this subsection covers also the situation in the nineteenth century when the entirety of Ireland was part of the United Kingdom. David Wilson and Chris Game give a quick definition of the United Kingdom's local government. To them local government is "a form of geographical and political decentralization, in which directly elected councils, created by and subordinate to Parliament, have partial autonomy to provide a wide variety of services through various direct and indirect means, funded in part by local taxation".(56) Since the United Kingdom has no single constitutional document, and local governments are seen as the creation of the United Kingdom's national Parliament in Westminster, there is no constitutional protection for local governments or for the rights of individual councils or the entire system.(57)

The traditional units of local governments in the United Kingdom are the parish, county, and borough that existed alongside each other in a tangled

multi-tier system.[58] That tangle was reformed since the 19th century with the enactment of national laws concerning local government, like the Local Government Act of 1894 that established a rudimentary administration for small parishes that was run by the residents, assembled to a parish council, and a professional administration for every parish with more than 300 inhabitants.[59] In the pre 19th century multi-tier system, the parish was the local government unit that dealt with daily life issues of its population, whereas any other unit (particularly the county) was there for the purpose of the monarch until the Municipal Corporations Act of 1835.[60] There were over 15,000 parishes by the 1830s, many of which existed since Medieval times, and they appointed various unpaid officers like constables and highway surveyors, took responsibility for law and order, road maintenance and the provision of either work or financial relief for the poor.[61] The number of boroughs was about 200 and they were urban centers that were allowed to govern themselves by royal charter.[62] Boroughs were first featured and England and Wales, but they were later extensively introduced into Scotland as well where they are called burghs.[63] The aforementioned Local Government Act of 1894 created 535 urban district councils, 472 rural district councils, and 270 non-county borough councils in England, that became a new unit of local government on top of the traditional units.[64] That created a two-tier system of local government, replacing the pre-modern multi-tier tangle.

The United Kingdom started extensive local government boundary reform in the first half of the 20th century. The number of urban district councils was reduced to 159 and that of rural district councils to 169 in 1929 and 1938.[65] The destruction of the peasant village during industrialization and the growth of many settlements and towns made it, that the pre-reform boundaries of local government areas did not correlate with the daily life area of most citizens any more.[66]

However, that was a reduction of the number of districts. The largest reduction of local government bodies of all kinds came through the Local Government Act

of 1972, which reduced their number from some 1,300 to just 401 in England.(67) Another reform was conducted in the 1990s. This reform dismantled the counties and made the districts the major body of local government. In the late 1990s 46 new unitary authorities were created in England, that exist alongside the preexisting two-tier authority areas.(68) Both major reforms led to the result, that the United Kingdom has on average the largest local government units and the highest ratio of citizens to elected councilors of any Western European country.(69)

3.3. France and Italy

As seen above, the countries that are thought to apply the "northern European model" of local government reform conducted nationwide municipal mergers, especially in the middle of the last century. But what about the countries of the "southern European model" like France and Italy? In the present day, France is a highly unitary and centralized semi-presidential republic. French local government applies a five-tier system: regions, departments, arrondisements, cantons, and communes (municipalities). The arrondisements and cantons are only in charge of a very limited number of tasks. The former is serving as the area of a sub-prefecture and sometimes for a road engineer, whereas the latter forms electoral areas which can also serve as police divisions.(70) The regions were introduced in 1964 as the youngest of all French local government units in order to group departments and coordinate their work.(71)

Prior to the French Revolution the country was centrally ruled by the king,(72) local rulers served as his proxy, and administration of cities and villages were not much different from one another.(73) Municipal assemblies were first introduced in 1787, two years before the outbreak of the Revolution.(74) The late Ancien Régime thus introduced elected councils at the most local level, but the rights to elect and to be elected were heavily curtailed by a rigid census suffrage based on tax amount and limited to men.

Before the Revolution there were different types of municipalities coexisting alongside each other,[75] but they were all unified into one type, that still exist today, on December 14, 1789 by the new government.[76] This unification process did not include large-scale mergers of municipalities. The municipal assemblies became the main body of local government, but reforms by Napoleon weakened their role and strengthened the role of the mayors,[77] a step that stayed intact until the reforms of duke de Richelieu in the 1820s which strengthened the assemblies again.[78]

France had a number of 35,838 municipalities in the middle of the 20th century.[79] Municipal mergers were seriously discussed since the 1960s.[80] A law that was the legal foundation for them was passed on July 16, 1971.[81] However, only a small number of municipalities took that opportunity, and some of the conducted mergers were cancelled only a few years later.[82] According to Jean-Marie Pontier there were 528 mergers concerning 1,336 municipalities in 1972, 193 mergers concerning 466 municipalities in 1973, 76 mergers concerning 154 municipalities in 1974, nine mergers concerning 19 municipalities in 1975, nine mergers concerning 20 municipalities in 1976, and only four mergers concerning seven municipalities in 1977. In 1978 the number of mergers were basically neglectable, and 29 merged municipalities split up again in 1979.[83]

The main reason given for municipal mergers was to make local governments more efficient, but merger was met with strong resistance from local residents and politicians, which resulted in the little number of mergers compared to the number of municipalities. That meant, that France had still more than 35,000 municipalities after the 1970s, of which the majority had less than 2,000 inhabitants.[84]

Italy is a parliamentary republic since 1946. Until recent reforms in the mid-2010s it had a three-tier system of local government comprised of communes (municipalities), provinces and regions.[85] Italy is considered a unitary state, but the regions play a relatively strong role, which is why Italy can also be described

as having a system halfway between unitary and federal.[86]

The development of the Italian municipalities began in the twelfth century.[87] The Italian Peninsula was occupied by Napoleonic France between 1802 and 1814, which introduced the centralized French structure of local government to the Italian states.[88] The provinces were formed after the unification of Italy in 1861 and cannot claim long historical roots unlike the regions, which are largely based on former states or other historically grown units, and the municipalities.[89] Italy had 7,810 municipalities in 1950 and 8,058 in 1972[90] that widely vary in size (both population and area) and cultural heterogeneity. Around eight per cent of all municipalities have a population of less than 500 people.[91] A large-scale merger of municipalities was never carried out in the country.[92]

It is obvious that France and Italy – the two representatives for the "southern European model" of municipal merger policy – did not conduct large scale municipal mergers, even at the time when Northern European countries conducted them. In case of France there were attempts to reduce the number of municipalities significantly, but they failed because of local resistance and because the central government refrained from merging reluctant municipalities forcefully, and it also did not establish a central plan for a nationwide merger.

3.4. Germany

Germany is a parliamentary federal republic that consists of 16 federal states since the German reunification in 1990. Three of these states are "city states", consisting of only one (Berlin and Hamburg) or two (Bremen[93]) municipalities. These "city states" and the Free State of Bavaria are the only states that do not have a three-tier system of government, which is the general standard in the other twelve states.[94]

The three tiers of state government are state level, county level, and municipal level. Counties and municipalities are considered creations of the federal states,

and only the state governments decide what happens to them. The federal government has no say in matters of local government.[95] The German constitution guarantees counties and municipalities the right to exercise their own local politics for the benefit of the local community in question. State governments are not allowed to interfere with that right. However, it is limited to the framework of existing legislation. State legislatures thus can and have set up legislation affecting the framework for local governments. Especially the right to a certain territory is not guaranteed, so state legislatures can change the territorial make-up of local government units at will, dubbing municipal mergers in Germany as a top-down process each federal state government can decide alone, theoretically without considering the wishes of any county or municipality.[96]

Smaller municipalities are under the oversight of counties, but counties can only exercise tasks that are explicitly assigned to them by law. Anything else is supposed to be handled by the municipalities.[97] The exact responsibilities of counties and municipalities vary from state to state.

Germany is thus a country in which the federal government cannot carry out nationwide merger policies, like in the case of Japan, but the individual federal states can conduct centrally planned municipal (and also county) mergers. However, two distinct periods of municipal merger policies can be singled out in Germany.[98] The first one peaked in the 1960s and 1970s. In that period most states of the Federal Republic (then commonly known as West Germany) conducted large-scale municipal mergers. The second one peaked in the 1990s and 2000s and was carried out by the five states that joined the Federal Republic upon the dissolution of the German Democratic Republic (East Germany).

The mergers in West Germany were initially triggered by the federal law of regional planning of 1965 which asked the state governments to prepare structural improvements of their municipalities.[99] That law did not order municipal mergers since that would have outstripped the rights of the federal government, but most

state governments ought to reach the goal of structural improvements with boundary reforms, which almost exclusively meant mergers. Those boundary reforms often took around eight years, because state governments often acted very cautious. For example, in North Rhine-Westphalia state parliament set up a commission that set the minimum aims of the reform and also suggested which municipalities should merge. Then the state government asked the municipalities to "voluntarily" merge according to the commission's recommendations. However, in more than half the cases, merger plans were met with strong resistance from both local politicians and residents. Then state legislature finalized the mergers anyway by laws after every other means of persuasion had failed.(100)

In comparison East Germany did not conduct any large-scale municipal mergers throughout its existence. At the time of German reunification the East German states had on average very small municipalities. The East German states adopted the form of local government of West Germany in 1990, but its implementation proved to be difficult without some kind of boundary reform.(101) Saxony was the first and at that time the only eastern state which conducted municipal mergers, while the other four states favored the establishment of joint municipalities.(102) The other four states, however, also finally conducted municipal mergers since the 2000s. Especially the merger policy in Brandenburg resembled that of the one in North Rhine-Westphalia three decades earlier.(103)

During the two periods of large-scale municipal mergers Germany's number of municipalities fell drastically. In the entire current territory of Germany the number of municipalities dropped from about 45,000 in 1900 to about 11,200 in 2013, of which the sharpest drop happened during the large-scale municipal merger in West Germany, where the number of municipalities dropped from 24,300 in 1968 to 8,500 in 1978.(104) Comparing individual states, the highest reduction (by more than 80 per cent each) happened in the three states of Hesse (83.9%), North Rhine-Westphalia (82.6%), and Saarland (85.6%). With the

exception of Rhineland-Palatinate (20.1%) and Schleswig-Holstein (17.9%) the percentage of reduction was at least 67.1 per cent (in Baden-Württemberg).[105] Rhineland-Palatinate and Schleswig-Holstein favored the establishment of joint municipalities over complete merger, which created shared administrations for the majority of municipalities, while leaving their councils and thus their political autonomy intact.

When we return to the aforementioned dichotomy of the "northern European" and "southern European" approaches to municipal boundary reform, we can conclude that Germany as a whole was mixed, with most states opting for the "northern European model" (especially North Rhine-Westphalia, Hesse, and Saarland) and two for the "southern European model" (Rhineland-Palatinate and Schleswig-Holstein). However, these two states created many joint municipality administrations instead.[106] The five states of former East Germany also implemented the "northern European model" since the 2000s, after four of them first tried their reform with the variation of the "southern European model" Rhineland-Palatinate and Schleswig-Holstein had implemented.

Conclusion

During the Meiji era the reorganization of local governments was one part of the effort to transform Japan into a Western-style nation state. However, a stringent unitary system was not introduced until 1888. Prior to this, central government tried multiple models, none of which lasted long. One other characteristic of this early "trial-and-error"-phase was that municipal mergers were not welcomed by the central government.

What can be concluded from the historical Japanese municipal boundary reforms? They showed, that they were carried out whenever there was a major system change. In the case of the GMM, this change was the establishment of a

modern municipality system with the introduction of *shi-sei* and *chōson-sei*. In case of the GMS, it was the replacement of those two laws with the *chihō jichi hō* in 1947 and a following fiscal crisis.(107)

One major difference between the GMM and the GMS was that during the GMS municipalities had much more freedoms to choose their preferred kind of merger and their merger partners. There were central merger plans in each prefecture, but municipalities were not forced to merge accordingly. However, the central and prefectural governments had to agree to mergers proposed by municipalities. There were numerous cases in which municipalities agreed to merge with each other after mutual negotiations, but found their merger denied by the prefecture or central government.(108) Furthermore, some municipalities which attempted to reject mergers were threatened by prefectures and the central government with penalties. Those points led to a de facto lack of municipal self-determination, despite the situation being little better than during the GMM, when the centrally planned mergers were completely forced upon municipalities.

Internationally Japan embraced centrally planned large-scale municipal mergers at the end of the 1880s, which was much earlier than any of those European countries that are generally named when defining or discussing the "northern European model". Prior to World War II the only one of these countries that implemented a large reduction of local governments was the United Kingdom in the years 1929 and 1938. The other countries implemented their large-scale reduction of local governments after World War II, with Sweden as the forerunner in 1952. Sweden's first large-scale merger occurred during the same period in which Japan carried out its second one.

As already mentioned in the introduction of this paper, embracing a large-scale municipal merger policy as a main part of local government reform is summarized into a "northern European model" in Western research on municipal boundary reform. That was also quoted by Japanese researcher Katagi Jun, but

Japan embraced it several decades before any northern European country. Although GMM was a proposal of a German legal scholar, Germany herself did not implement large-scale boundary reforms until the late 1960s, so Japan can be seen as the eventual forerunner of the "northern European model" as a whole. As the main result of this analysis, the author herewith contests the term "northern European" for this model as too Eurocentric and proposes calling it the "Japanese model", or, because of a major reform of district council boundaries in England prior to World War II, the "Japanese-English model" of basic local government boundary reform.

Notes

（1） E.g. Saitō Kazuhiro e.al., "Shi-chō-son gappei ni tomonau shi-chō-son meishō oyobi shi-chō-son yakuba ritchi no henka ni kan-suru kenkyū," *Kaikei kensa kenkyū*, no. 37 (2002): 301-06; Hayashi Ryōsuke, "Shi-chō-son gappei ni yoru zaisei katsudō no kōritsu-ka: Gappei patān o kōryo-shita jisshō bunseki," *Kaikei kensa kenkyū*, no. 47 (2013): 27-38; Hashimoto Takashi and Yuzawa Akira, "shi-chō-son gappei-go no toshi keikaku kuiki no chiiki kakusa to jūmin ishiki ni kan-suru kenkyū: Gunma-ken Isezaki-shi o jirei to shite," *Toshi keikaku ronbun shū*, 40 (2005): 91-6; Satō Yasuyuki, "Shōwa/heisei no daigappei ni kan-suru kenkyū to kadai," *Sonraku shakai kenkyū* 49 (2013): 11-38; Katagi Jun, *Nichi-doku hikaku kenkyū shi-chō-son gappei: Heisei no daigappei wa naze shinten-shita ka?* (Tokyo: Waseda Daigaku Shuppanbu, 2012).

（2） All numbers of Japanese municipalities in this paper are according to the Japanese Ministry of Internal Affairs and Communications (*sōmushō*), URL: http://www.soumu.go.jp/gapei/gapei2.html (accessed July 25, 2019).

（3） Suzuki Eitarō, *Nihon nōson shakaigaku genri* (Tokyo: Jichōsha, 8th edition 1943). He uses the term *shizen-son* throughout the book, like pp. 38-9, 85, and the term *gyōsei-son* on p. 537.

（4） E.g. Miyamoto Ken'ichi, *Chihō jichi no rekishi to tenbō* (Tokyo: Jichitai Kenkyūsha, 1986); Hobo Takehiko, *Shi-chō-son gappei to chiiki no yukue* (Tokyo: Iwanami Shoten, 2002); Shima Yasuhiko, ed., *Chōson gappei to nōson no henbō* (Tokyo: Yūhikaku, 1958); Tomaru Taisuke, *Chihō jichi seido shiron* (Tokyo: Shin-Nihon Shuppansha, 1982); Yamada Kōhei, "Shi-chō-son gappei no rekishi-teki kōsatsu," in Muroi Tsutomu, ed., *Gendai jichitai saihen ron: Shi-chō-son gappei o koete* (Tokyo: Nihon Hyōron Sha, 2002): 216-59.

（5） Kurt Steiner, *Local Government in Japan* (Stanford: Stanford University Press, 1965).

（6） For comprehensive explanations of the idea of a “northern European model” and “southern European model” of municipal merger policies see Hellmut Wollmann, “The Two Waves of Territorial Reform of Local Government in Germany,” in: John Meligrana, ed., *Redrawing Local Government Boundaries: An International Study of Politics, Procedures, and Decisions*, (Vancouver: UBC Press, 2004): 116-18 and Katagi, *Nichi-doku hikaku*: 30.

（7） Matsuzawa Yūsaku, *Chōson gappei kara umareta Nihon kindai: Meiji no keiken* (Tokyo: Kōdansha, 2013): 133.

（8） See Karl Friday, “The Futile Paradigm: In Quest of Feudalism in Early Medieval Japan,” *History Compass* 8, no. 2 (2010): 179-96 for a thorough criticism on applying the term “feudal” to the order in medieval and early modern Japan.

（9） Kashihara-shi shi henshū iinkai, eds., *Kashihara-shi shi* (Kashihara: Kashihara-shi Yakusho, 2013): 291. Since the lands of the Tokugawa were normally called *tenryō*, the new Meiji government occasionally called these lands after confiscation *shin no tenryō* (“true *tenryō*”).

（10） Shiohara Yoshinori, *Meibōka to <kaika> no jidai: Chiiki chitsujo no saihen to gakkō kyōiku* (Kyoto: Kyōto Daigaku Gakujutsu Shuppansha, 2014): 136.

（11） Kashihara-shi shi henshū iinkai, *Kashihara-shi shi*: 292-3.

（12） *Gun* is frequently translated as “district”, but since this is also the proper translation for the term *ku*, and because both *gun* and *ku* are appearing in this paper, the former is translated into “county”, named after the similar level units of most U.S. states, to avoid ambiguity.

（13） Yamanaka Einosuke, *Kindai Nihon no chihō seido to meibōka* (Tokyo: Kōbundō, 1990):12 and Matsuzawa, *Chōson gappei*: 68-70.

（14） Matsuzawa, *Chōson gappei*: 56-7.

（15） Ibid.: 68.

（16） Dazaifu-shi shi hensan iinkai, eds., *Dazaifu-shi shi: Tsūshi-hen III* (Dazaifu: Dazaifu-shi, 2004): 72.

（17） Hasebe Hiroshi, “Mura no saihen: Kinsei sonraku kara kindai sonraku e,” in Shōji Shunsaku, ed., *Shi-chō-son gappei to mura no saihen: Sono rekishi-teki henka to renzoku-sei* (Tokyo: Nō-San-Gyoson Bunka Kyōkai, 2014): 53-4.

（18） Prussia had three basic types of municipalities. “*kreisfreie Stadt*” (literally “city or town free of a county” = Japanese *shi*), “*kreisangehörige Stadt*” (literally “city or town belonging to a county” = Japanese *chō* or *machi*), and “*Gemeinde*” (literally “municipality” or “community” = Japanese *son* or *mura*). County means “*Landkreis*” or “*Kreis*”. In contemporary Germany the municipal structures slightly differ from *Land* (federal state) to *Land*, but *Länder* which formerly belonged to Prussia generally retain the structure explained above. The German language does not distinguish between “city” and “town” with one single word. Both are called Stadt. Hence both “*kreisangehörige Stadt*” and “*kreisfreie Stadt*” are

generally translated as *shi* in Japanese (e.g. Katagi, *Nichi-doku hikaku*), which, however, is a questionable practice amidst the fact that the modern Japanese municipal structure is based on the Prussian model.

(19) See Ishikawa Isao, *Kindai Nihon no meibōka to jichi: Meiyoshoku seido no hōshakaishi-teki kenkyū* (Tokyo: Bokutakusha, 1987): 15.

(20) Ueyama Jun, "shi-sei/chōson-sei no sekō to chōson gappei," in Meiji Ishin Shigakkai, eds., *Kōza meiji ishin 7: Meiji ishin to chiiki shakai* (Tokyo: Yūshisha, 2013): 234.

(21) Matsuzawa, *Chōson gappei*, p. 169. The pattern of merging municipalities with a joint municipality office (*rengō kochō yakuba*) into one new municipality was especially often conducted in Shiga prefecture. From the 195 mergers, 104 were mergers of municipalities with a common joint office. The percentage of this is 53.3 %, which is relatively high compared to other prefectures (Ido Shōzō, "Shiga-ken ni okeru meiji 22-nen chōson gappei no chirigaku-teki kenkyū," *Kanazawa Daigaku Kyōiku Gakubu Kiyō: Jinbun / Shakai / Kyōiku Kagaku-hen*, no. 13 (1965): 51-2).

(22) For example, 64 % of all municipalities in Nagano prefecture were merged forcibly. Municipalities could generally conduct a merger according to their own wishes, if approved, but such mergers did not occur in Nagano prefecture, at all. Tsutsui Masao, "Seiritsu-ki ni okeru gyōsei-son no kōzō," in Ōishi Kaichirō, Nishida Yoshiaki, eds., *Kindai nihon no gyōsei-son: Nagano-ken Hanishina-gun Goka-mura no kenkyū* (Tokyo: Nihon Keizai Hyōron Sha, 1991): 83.

(23) Katagi, *Nichi-doku hikaku*: 52.

(24) Miyamoto Ken'ichi, "Meiji taishō-ki no chōson gappei seisaku: Meiji chihō jichi-sei no mujun to sono tenkai," in Shima, ed., *Chōson gappei*: 155-6.

(25) Ushiyama Kunihiko, "Chihō seifu saihen ni kan-suru ikkōsatsu: Yamaguchi-shi / Ogōri-machi gappei mondai o tegakari ni," in Nihon Chihō Jichi Gakkai, eds., *Gendai no bunken-ka: Sengo chihō jichi no tenkai no naka de* (Tokyo: Keibundō, 1995): 161.

(26) Ibid.: 161-2.

(27) Ichikawa Yoshimune "Senji / senryō-ki ni okeru shūken taisei no hen'yō: Gendai Nihon no chūō – chihō kankei-shi no sai-kentō," in Nihon Chihō Jichi Gakkai, *Gendai no bunken-ka*: 123-4.

(28) Suganuma Masahisa, "Chōson gappei to nōgyō kyōdō kumiai (kami): Chōson gappei ga nōgyō kyōdō kumiai keiei ni oyobosu eikyō ni tsuite no kenkyū," *Kyōdō Kumiai Keiei Kenkyūsho Hōkoku*, No. 35 (1956): 1.

(29) Municipal police were abolished in 1955.

(30) "Chōson o gappei-shite yori yoi kyōdo o tsukurimashō," in: *Daizaifu-machi kōminkan hō (gō gai)*, March 1954.

(31) Mikuriya Takashi and Iio Jun, eds., *Chihō jichi ni ikiru: Miyazawa Hiroshi kaiko-roku*

(Tokyo: Dai-ichi Hōki, 2007): 60-1.

(32) Carl Sumner Shoup (1902-2000), American economist. Head of the Shoup Tax Mission in 1949.

(33) Kanbe Masao (1877-1959), Japanese expert on public finance (*zaisei gakusha*). Head of the Investigative Commission on Local Administration from December 1949 to March 1952.

(34) Refer to *Honpō zeisei oyobi kazei kankei zakken / shāpu shisetsudan rainichi kankei / bunkatsu 2,* (Japan Center for Asian Historical Records, National Archives of Japan, URL: https://www.jacar.archives.go.jp/das/meta/image_B18110191500?IS_KIND=detail&IS_STYLE=default&IS_TAG_S1=InfoId&IS_KEY_S1=M2018120417120016223&, accessed October 31, 2019) for the full text of the entire report as archived by the National Archives of Japan.

(35) Refer to *Gyōsei jimu sai-haibun ni kan-suru kankoku,* (National Archives of Japan, URL: https://www.digital.archives.go.jp/DAS/meta/listPhoto?KEYWORD=&LANG=default&BID=F0000000000000008618&ID=M0000000000001784226&TYPE=&NO=, accessed October 31, 2019) for the full text of the report as archived by the National Archives of Japan.

(36) Takashima Masaaki, "Wakayama-ken no shi-chō-son gappei: Meiji to shōwa no 'dai-gappei' o chūshin to shite," *Kishū Keizai-shi Bunka-shi Kenkyūsho Kiyō*, no. 23 (2003): 14.

(37) That opinion can be found in the article "Chōson gappei o meguru zadan-kai (kami)," in: *Nishi Nippon Shinbun (Chikugo-ban B)*, June 24, 1953.

(38) Nagano Shirō, *Watashi no 20-seiki: Nagano Shirō kaiko-roku* (Tokyo: Gakuyō Shoten, 2004): 211.

(39) Shinohara Toshihiro, "Dai-niji taisen-go no chihō jichi no seiritsu to shōwa no dai-gappei," *Jichi Jimu Seminā* 42, no. 7 (2013): 35.

(40) E. g. Kashiwa Kikaku, eds., *Gappei no ato, jiritsu no ato: Nagano-ken shi-chō-son gappei* (Nagano: Kashiwa Kikaku, 2012): 110.

(41) Yoshizaki Kensuke, "Kōiki gyōsei to shi-chō-son gappei," *Toshi Mondai Kenkyū* 50, no. 6 (1998): 48.

(42) Ibid., "Sengo shi-chō-son gappei no keii to kadai," *Toshi Mondai* 90, no. 3 (1999): 5-7.

(43) Yoshioka Kenji "Chōson gappei no kihon mondai," *Ōsaka Keidai Ronshū*, no. 19 (1957): 6.

(44) Francesco Kjellberg, "Local Government and the Welfare State: Reorganization in Scandinavia," in Bruno Dente, Francesco Kjellberg, eds., *The Dynamics of Institutional Change: Local Government Reorganization in Western Democracies* (London: Sage Publications, 1988): 39.

(45) Kjellberg, "Local Government": 48.

(46) Niklas Hanes, Magnus Wikström, "Amalgamation Impacts on Local Growth: Are

Voluntary Municipal Amalgamations more Efficient than Compulsory Amalgamations?" *Canadian Journal of Regional Science* 33, no. 1 (2010): 58.

(47) Gustafsson, *Local Government Reform in Sweden* (Umeå: CWK Gleerup, 1980): 48.

(48) Gustafsson, *Local Government Reform*: 9

(49) Hanes, Wikström, "Amalgamation Impacts": 59 and Gustafsson, *Local Government Reform*: 10.

(50) Gustafsson, *Local Government Reform*: 10.

(51) Ibid.: 10 and Kjellberg, "Local Government": 48-9.

(52) Gustafsson, *Local Government Reform*: 10. See Hanes, Wikström, "Amalgamation Impacts": 62 for the reasons why voluntary mergers often failed.

(53) Jens Blom-Hansen, Kurt Houlberg, Søren Serritzlew, "Size, Democracy, and the Economic Costs of Running the Political System," *American Journal of Political Science* 58, no. 4 (2014): 793.

(54) Kjellberg, "Local Government": 56-7.

(55) Blom-Hansen, "Size": 793-4. Sune Welling Hansen, "The Democratic Costs of Size: How Increasing Size Affects Citizen Satisfaction with Local Government," *Political Studies*, no. 63 (2015): 377. David Dreyer Lassen, Søren Serritzlew, "Size and Equal Opportunity in the Democratic Process: The Effect of the Danish Local Government Reform on Inequality in Internal Political Efficacy," *World Political Science Review* 7, no. 1 (2011): 1. David Dreyer Lassen, Søren Serritzlew, "Jurisdiction Size and Local Democracy: Evidence on Internal Political Efficacy from Largescale Municipal Reform," *The American Political Science Review* 105, no. 2 (2011): 242.

(56) David Wilson, Chris Game, *Local Government in the United Kingdom*, (New York: Palgrave Macmillan, 3rd edition 2002): 33.

(57) Wilson, Game, *United Kingdom*: 29.

(58) Ibid.: 50.

(59) Jean-Daniel Herrenschmidt, *Le problème des petites communes en France* (Paris: Librairie Générale de droit et de jurisprudence, 1936): 16.

(60) John Kingdom, "England and Wales," in J. A. Chandler, ed., *Local Government in Liberal Democracies: An Introductory Survey*, (London: Routledge, 1993): 21. For a comprehensive overview over the legislation concerning local government since 1835 see Wilson, Game, *United Kingdom*: 52.

(61) Wilson, Game, *United Kingdom*: 50.

(62) Ibid.

(63) Ibid.: 50-1.

(64) Ibid.: 52. Similar units called town councils were established in Scotland in 1900 (Ibid.: 52).

(65) Ibid.: 54.

(66) John Dearlove, *The reorganisation of British local government: Old orthodoxies and a political perspective*, (Cambridge: Cambridge University Press, 1979): 84-100.

(67) Dearlove, *The reorganization*: 1-2.

(68) Wilson, Game, *United Kingdom*: 60-2.

(69) Ibid.: 70.

(70) M. C. Hunt, J. A. Chandler, “France,” in Chandler, ed., *Liberal Democracies*: 56.

(71) Hunt, Chandler, “France”: 58.

(72) Marguerite Boulet-Sautel, “Villes et communautés sous l’Ancien Régime,” in Louis Fougère, Jean-Pierre Machelon, François Monnier, eds., *Les communes et le pouvoir: de 1789 à nos jours* (Paris: Presses Universitaires de France, 2002): 4.

(73) Boulet-Sautel, “Villes et communautés”: 31.

(74) Ibid.: 37.

(75) Herrenschmidt, *Petites communes*: 1-3.

(76) Gérard Sautel, “La Révolution française,” in Fougère, Machelon, Monnier, eds., *Les communes et le pouvoir*: 65-6.

(77) Jean Tulard, “Le Consulat et l’Empire,” in Fougère, Machelon, Monnier, eds., *Les communes et le pouvoir*: 159-69.

(78) Michel Chabin, Emmanuel de Waresquiel, “La Restauration,” in Fougère, Machelon, Monnier, eds., *Les communes et le pouvoir*: 171 / 179-83.

(79) Jean Massot, “De la Troisième à la Quatrième République,” in Fougère, Machelon, Monnier, eds., *Les communes et le pouvoir*: 507.

(80) Jean-Marie Pontier, “La Cinquième République,” in Fougère, Machelon, Monnier, eds., *Les communes et le pouvoir*: 596.

(81) Pontier, “La Cinquième République”: 598 / 601.

(82) Yves Mény, “Radical Reforms and Marginal Change: the French Socialist Experience,” in Dente, Kjellberg, eds., *Dynamics*: 138-143.

(83) Pontier, “La Cinquième République,”: 601-2.

(84) Hunt, Chandler, “France,”: 56.

(85) R. E. Spence, “Italy,” in Chandler, ed., *Liberal Democracies*: 75.

(86) Spence, “Italy”: 76.

(87) Ibid.: 74.

(88) Ibid.: 74-5

(89) Ibid.: 77

(90) L.J. Sharpe, “Local Government Reorganization: General Theory and UK Practice,” in Dente, Kjellberg, eds., *Dynamics*: 99.

(91) Spence, “Italy,”: 77-8.

(92) Ibid.: 78.

(93) The two municipalities of the State of Bremen are the cities of Bremen and Bremerhaven.

(94) A. R. Peters, "Germany," in Chandler, ed., *Liberal Democracies*: 102.

(95) Wollmann, "Two Waves,": 107.

(96) Ibid.

(97) Peters, "Germany,": 102-3.

(98) Large-scale municipal mergers were not common in prewar Germany. However, the Weimar Republic and Nazi Germany saw some isolated major urban amalgamations, like the formation of "Greater Berlin" (large-scale merger between Berlin and many of its suburbs) in 1920, the formation of "Greater Hamburg" (large-scale merger between Hamburg and many of its suburbs, including the former Prussian *kreisfreie Stadt* of Altona) in 1937, or the merger of the two cities of Barmen and Elberfeld and some of their suburbs into the City of Wuppertal in 1929.

(99) Björn Kauder, "Incorporation of municipalities and population growth: A propensity score matching approach," *Papers in Regional Science* 95, no. 3 (2016): 541.

(100) Wollmann, "Two Waves,": 112-3.

(101) Sebastian Blesse, Thushyanthan Baskaran, "Do Municipal Mergers Reduce Costs?: Evidence from a German Federal State," *Zentrum für Europäische Wirtschaftsforschung GmbH*, Discussion Paper No. 16-041 (2016), http://ftp.zew.de/pub/zew-docs/dp/dp16041.pdf (accessed July 26th 2018): 10.

(102) Wollmann, "Two Waves,": 120-6.

(103) Blesse, "Municipal Mergers,": 2-12.

(104) Kauder, "Incorporation,": 541.

(105) All reduction percentages according to Kauder, "Incorporation":541

(106) Wollmann, "Two Waves,": 116-8.

(107) The most recent GMH was not accompanied by a large-scale reform of the entire system and is an exception to the GMM and GMS in that regard.

(108) Two examples would be the proposed mergers of Ōmizo and Ekami towns and of Daizenji town and Mizuma village, both in Mizuma county, Fukuoka prefecture. Those two proposals were rejected by the prefectural government, because they were judged insufficient. Refer to the respective chapters of Fukuoka-ken, eds., *Fukuoka-ken shi-chō-son gappei-shi* (Fukuoka: Fukuoka-ken, 1962).