

Comparative Local Governments in Europe

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Abstract Local authority in Europe is a product of centuries-old tradition. Stoker (1991, 1) even says that local government is a key element in the political system of European liberal democracy, civilizational acquisition, and also a theoretical and practical component of any modern democratic political system. The most basic definition of local authority is that it is the level of government closest to citizens and has the task of representing the significance and views of the locality. In Europe, diverse and different arrangements or designs of local authorities have developed which differ both in scale, structure, and tasks, as well as in terms of their relations with regional and national levels of authority. A common feature of these systems is how they originated from their own traditions and historical forms of development. The second part of this featured chapter will concentrate on the prevailing typologies of local government that can be used in comparative research about local authorities in different national settings. On the one hand, there are many typologies which can be used in academic discussions; on the other hand, their usefulness is somewhat questionable because none of them cover all countries – for instance, many of them do not include the "new democracies" of Central and Eastern Europe.

Keywords: • local government • community • typology • European Charter of Local Self-Government • Europe

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1 Introduction: The European Charter of Local Self-Government as the foundation

Local authority is a product of centuries-old tradition in Europe. Stoker (1991, 1) even claims that local government is a key element in the political system of European liberal democracy, a civilizational acquisition, and a theoretical and also practical component of all modern democratic political systems. The simplest definition of a local authority is that it is the level of authority that is closest to citizens and has the task of representing the significance and views of the locality. The exercise of local government is a demanding task which relates primarily to the division of powers between the state and local communities (Brezovšek *et al.* 2008, 120). We may talk about local government only if the state recognizes the legal existence of local communities, grants them the right to decide about certain issues – which it does not interfere with –, and provides them with the necessary means for regulating these matters. Greer *et al.* (2005, 11) define three of the most important normative elements on which local government is based in Europe. The first element is autonomy, which indicates the degree of decision-making power between the central and local authorities. The degree of decision-making at the local level prevents the concentration of political power at the central level and allows for different political choices in different local environments. The second element is democracy, which defines the local authority as a political platform, and opportunities for citizens' participation. The existence of local government promotes the population's participation in managing local affairs. The third element is efficiency, since local authorities are more efficient at providing public services and finding solutions to local problems and adapting measures to local conditions.

The diversity of regulations or models of local authorities is respected in the European Charter of Local Government, which is the basic document and European standard for local authorities, as well as the standard for the basic democratic system institutions in the European Union Member States. The European Charter of Local Government was drawn up by the Council of Europe and has significantly contributed to the development of local authorities and local democracy. It was adopted on 15 October, 1985 in Strasbourg, and entered into force on 1 September, 1988, when it was ratified by the first four Council of Europe member states.¹ By ratifying the European Charter of Local Government, countries commit to adhering to the principles and rules of the Charter. Thus, the countries that have ratified the Charter must ensure the legal basis of local government through a national normative framework, meaning that the status of local government must be recognized in national legislation. Countries need to clearly define the field of activity and the structure of local government in terms of methods and criteria for allocating competences. At the same time, they also define the capacity of local authorities to manage a substantial proportion of public affairs through their councils (consisting of democratically elected representatives), their executive bodies, and internal administrative structures with own staff. Local authorities should be provided with appropriate financial resources (namely, their own resources and property), the right to collect local taxes, a system of financial equalization, a grant system, access to capital

markets, and resource management. Local authorities must have a guarantee of autonomy, which is reflected in the status of elected representatives, the protection of borders of local communities, the restriction of control over local community and judicial means. They must also enjoy the right of association and the principle of consultation, which involves the participation of local communities. If intermediate levels between local government and the national authority are introduced, it is necessary to ensure the democratic functioning of these levels in accordance with Article 13 of the Charter (1985). Finally, it is necessary to ensure the realization of political rights, which is reflected in the right to vote and the democratic electoral process, freedom of expression and association, the right to inform citizens and their participation in all forms of local democracy (Brezovšek and Kukovič 2015, 218–219).

Among the main objectives of the Charter (1985), which are laid out even in the preamble, the following are included: the creation of effective local governance which is as close as possible to citizens and, in accordance with the principles of democracy and the decentralization of power, a focus on cross-border cooperation, strengthening inter-municipal relations, and removing administrative and technical barriers to cross-border cooperation, and achieving a higher level of communication in the administrative field and respecting the principles of democracy in terms of the rights of citizens to participate in the management of public affairs.

In the third article the Charter (1985) defines local self-government as the right and ability of local authorities to regulate, within the limits of the law, a substantial proportion of public affairs within the framework of their tasks and for the benefit of the local population. This right is exercised through councils and assemblies consisting of members elected by free and secret ballot on the basis of direct, equal and universal suffrage. More precise activities are defined in the fourth article of the Charter (1985), which is based on six important principles:

- The basic competencies and tasks of local authorities are prescribed by the constitution or by law. This provision does not preclude the transfer of powers and special-purpose tasks to local authorities in accordance with the law;
- Local authorities have the freedom to exercise their own initiative about every matter that is not excluded from their jurisdiction or is not the responsibility of any other authority;
- Public tasks should, if possible, be implemented by those authorities that are closest to citizens; the assignment of a task to another authority should be justified by the scope and nature of such task, as well as the requirements of efficiency and effectiveness;
- The competencies awarded local authorities must be complete and exclusive, and they should not be undermined or restricted by central or regional authority, unless determined by law;

- In the powers delegated to them by the central or regional authorities, local authorities (as far as possible) have to be given the freedom to make decisions about how to adapt their implementation to local circumstances;
- As far as possible, local authorities must be promptly and appropriately consulted about their opinions when planning and deciding in all matters that directly affect them.

In addition to the principles listed in the analysis of the provisions of the European Charter of Local Government (1985), we should not overlook the ninth paragraph, which regulates the field of financial resources and principles that should be observed. The first is the principle of relevance, which provides that local authorities, within the framework of national economic policy, are entitled to adequate financial resources which they may freely dispose of within their jurisdiction. The principle of proportionality provides that the financial resources of local authorities must be proportionate to the tasks laid down by the constitution and the law. At least some proportion of the financial resources of local authorities must originate from local taxes and contributions, the amount of which can be determined by the local authorities themselves. This is the essence of the principle of self-financing. The flexibility principle states that the financial systems by which resources are made available to local authorities should be sufficiently diverse and flexible that, as far as practicable, they are in accordance with the evolution of the actual cost of carrying out their tasks. In order to protect financially weaker local communities, the principle of equalization is applied, which provides that it is necessary to introduce procedures for financial equalization or other appropriate measures to correct the effects of the unequal distribution of financial resources and the financial burden they involve. Such procedures or measures, on the other hand, must not diminish the freedom of decision-making of local authorities in their field of jurisdiction. The principle of cooperation is to be implemented in such a way that local authorities need to be consulted about the appropriate way to allocate redistributed resources. The principle of autonomy relates to subsidies or grants to local authorities that should not, as far as possible, be strictly dedicated to financing certain projects. The provision of such resources should not interfere with the fundamental freedom of local authorities to freely decide within their own jurisdiction. Finally, the principle of borrowing is highlighted, which holds that local authorities should have full access to the domestic financial market when taking out loans for larger investments, within the limits of the law.

In the twentieth century local government systems in Europe made tremendous progress, and the European Charter of Local Self-Government (1985) may be thanked in large part for that. Local authorities have become a democratic indicator of particular political systems and have contributed to stability and security in Europe. The principle of subsidiarity, which represents the decentralization of public affairs or competences to the most appropriate (as close as possible to the citizen) level has established itself again and played a decisive role. The principle of subsidiarity is crucial for understanding the role of local authorities in contemporary democracies, since it is a fundamental philosophical principle of modern local governments, a way of thinking, and also a fundamental

criterion for the critical assessment of local government in any particular country. In institutional, administrative and organizational terms, it means constant reflection on the division of competences with regard to the organization and decision-making of public affairs and the means of their implementation. Of course, the focus of attention is on the citizen, who is equipped with modern rights and freedoms. The principle of subsidiarity thus aims at constantly balancing the freedom of the individual and various authorities. However, the state and international institutions, especially the European Union, must take into account the role and position of local and regional authorities in each country. Under international law, the principle of subsidiarity is a fundamental principle of European integration, but it is not only related to the vertical division of power or public affairs to local, regional and national authorities, but also to the issues of protecting the autonomy and freedom of the individual, the size of local communities, their funding, the functioning of local administrative apparatus, regionalization, etc. (Vlaj 2005, 26). Although subsidiarity is a dynamic concept, it needs to be interpreted in line with the changes that are taking place in society, the institutional structures of the EU member states, the international environment, and technology. The Maastricht Treaty defines the European Union as an association in which decisions are taken as close as possible to citizens and, from this point of view, local and regional authorities play a central role because they are close to European citizens and are a key factor in the future implementation of European Union initiatives and regulations (Brezovšek and Kukovič 2015, 220–221).

2 Typologies of local government systems

Local government systems are usually perceived and studied as independent variables in dealing with (possible) differences in human resources patterns, professionalism, the role of mayors in local and multi-level governance arrangements (vertical and horizontal networking), the interpretation of the notion of democracy, as well as (de)centralization and attitudes towards the modernization of the public sector (Heinelt and Hlepas 2006, 21; Brezovšek and Kukovič 2012, 27). Making a decision about the most appropriate typology of local government system that could be used in comparative research into local authorities in different countries is problematic. On the one hand, there are many typologies that can be used in academic debates; on the other hand, their usefulness is questionable because none of them cover all countries – many do not include the "new democracies" of Central and Eastern Europe. Thus, it is essential that existing typologies are adapted and updated (Heinelt and Hlepas 2006, 21; Brezovšek and Kukovič 2015).

2.1 The vertical power dimension

One comparative analysis of local authorities uses different divisions of the vertical power dimension or the division of powers between local and higher levels of government. For example, Bennett (1993; Kukovič 2011, 60; Kukovič 2015, 33–34) distinguishes between (1) a *dual structure*, where on a local level both local governments and state agencies simultaneously operate, but with different competencies (example: United Kingdom); (2) a *fused system*, where local authorities and their competencies are defined both locally and by a higher level of authority (for example: Poland, Czech Republic, and Hungary); and, (3) a *mixed system* (the case of Denmark and Sweden). Bennett (1993) classifies the new democracies of Central and Eastern Europe (Hungary, Poland, and Czech Republic) as having fused systems. In the past, this typology was not widely accepted, since all European countries were classified as having fused systems or moving towards the fused system, with the exception of the United Kingdom (dual structure) and Denmark and Sweden (both mixed systems). Such a typology was also considered to be too simple to take into account differences not only connected to some aspects of vertical power relations, but also in conjunction with the possible effects rising from these relations. In addition, fused systems have undergone radical changes in past decades – in many countries, territorial reforms (new levels of government, amalgamations, etc.) and functional reforms (decentralization, devolution, new public management) have been implemented, which has increased the differentiation between such systems (Kersting and Vetter 2003; Kukovič 2015).

Page and Goldsmith (1987), and later, John (2001) make a distinction between the *Northern* and *Southern* European countries on the basis of three indicators. For the first time, they distinguish according to the number and type of functions assigned to the subnational authority; second, the legal discretion open to local policy makers; and third, the access of local politicians to central authority (John 2001, 26). Their key idea is that there is an inter-relationship between these indicators. It is clear that the policies that are enacted, as well as the corresponding leadership roles which are to be assumed by the mayors, vary greatly depending on the pattern of this interaction. The proposed dichotomy of local government systems claims that the Southern European systems are characterized by municipalities with some functions and competencies, a low level of legal discretion, and the significant access of local politicians to the central (and regional) level. In other words, local politicians can have a strong influence on the central level of authority, but they represent politically weak municipalities. On the other hand, Northern European systems are marked by the strong decentralization of functions, a high degree of discretion, and the low access of local politicians to the central government.

The reasons for the differences between the countries in Northern and Southern Europe have their roots in the historical development of the latter. In Southern Europe, a model of the Napoleonic state spread across all modern national countries which developed a unified administration throughout their territories, and managed the country's educational systems directly from the country's capital. The central authority looked at local elites

with mistrust and therefore built its own territorial organization with a directly established administrative body. In the twentieth century, social states began to appear in Southern Europe, creating new competencies for central authorities. Local authorities thus far have embodied local cultural and political identities which are represented at higher authority levels through local politicians, who mostly act as local patrons and use different networks to access national and regional centers of political power in order to represent local affairs (Page 1991; John 2001). High accessibility and low legal discretion are linked to the tendency of actors (both local and national politicians and central and regional officials) to exist within big and dysfunctional bureaucracies. The purpose is to exploit uncertain areas through extortion and/or using clientelist-networking techniques. Local politicians are forced to act within a given framework of territorial representation and political localism. The size of local communities is still small, because within a given context, community identity has been more important than the effectiveness of public services. Southern European countries therefore have many levels of authority – partly as a means of increasing the potential for territorial representation (Brezovšek and Kukovič 2012, 29–30; Kukovič 2015, 34–35).

In the Northern European countries of the eighteenth and nineteenth centuries, central (state) power did not develop a centralized bureaucracy but, along with local elites, implemented national policies (Page 1991). Education was decentralized – under the jurisdiction of local institutions – and in many countries the Protestant church remained part of the state. Strict and impartially enforced national legislation, as well as a professional and effective civil service, secured the unity of modern statehood. Later, when countries responded to demands for equality, legal entitlement and social security, a social protection system was established whereby local authorities were responsible for social public services. Northern democracies, based on the independence of power of the local level to decide on important issues, developed a theory of local government which became the "small political system" (John 2001, 30). Local politicians had to achieve results, notably through the use of local resources and with an emphasis on providing local public services. Since the early 1950s many municipalities have merged, thereby increasing efficiency and providing better public services. In the countries of Northern Europe there are only a few levels of authority (Heinelt and Hlepas 2006, 23–24; Brezovšek and Kukovič 2012, 30; Kukovič 2015, 35–36).

This typology of the local-level governance of Northern and Southern Europe has clear advantages: it is simple, and it avoids a legalistic approach, typical of traditional typologies – the old institutionalism, that has long prevailed in comparative analyses of governments, including the analysis of local authorities. Instead, this typology clearly opens up space for reflection and inspires sociological and, above all, historical institutionalism. Naturally, there are also some disadvantages: Page and Goldsmith (1987) only studied Sweden, Norway, Denmark, the United Kingdom, France, Italy and Spain (unitary states), but did not take into account the federal systems of Germany, Austria and Switzerland. In a later study, John (2001, 35), following the example of the typology of Page and Goldsmith, also included Belgium, Greece and Portugal into the

southern group, and Finland, Ireland and the Netherlands in the northern group, but Germany and Switzerland were again excluded. Furthermore, at the time when Page and Goldsmith's (1987) typologies were originally developed, the countries of Central and Eastern Europe could not be included in the analysis; later, John (2001) confined himself only to classifying the countries of Western Europe. At this point, the question arises whether the similarly classified group of countries, especially the northern group, would become more heterogeneous if other countries were also included in the analysis (Heinelt and Hlepas 2006, 23–24; Brezovšek and Kukovič 2012, 30–31, Kukovič 2015, 36).

In a slightly later study, Goldsmith (1992, 395) developed a typology of local governments based on the goals or principles emphasized by a particular model:

1. The *clientelistic/patronage model* strongly assumes that the primary task of local politicians is to ensure that the interests of the community are well supported (in respect of special public goods and services), and are represented at higher levels of government (this model is represented by France, Italy and Greece);
2. The *model of economic development*² assumes that the most important task of local government is to promote the economic development of the city; basic services and citizen protection (fire safety, police and transport networks) form the basis for creating development policies; local politicians are also expected to strengthen local economic development (as represented by the United States of America);³
3. In the *model of the welfare state*, the effective exercise of public services (in conjunction with national standards of equity and redistribution) has been shaped by local governments; usually local interests are not only represented through individual representatives, but through local government associations at the national level; local politicians are expected to be good managers; in addition, the effective provision of public goods places great emphasis on paid and professional civil servants, which is criticized by some as local bureaucratic paternalism (representatives of this model include Germany, the Netherlands, the UK, and the Scandinavian countries);
4. In some welfare states (especially in the United Kingdom), a *consumer model (market-enabling model)* has been developed based on the experiences of the United States of America, in which local authorities have moved away from the role of service providers in order that public services may be delivered (either alone, or in cooperation with the local administration) by other agencies; the main difference compared to the model of economic development lies in the fact that local authority is limited in such a way that it allows only assumes functions related to market mechanisms for the economic development of the city (Heinelt and Hlepas 2006, 24–25; Brezovšek and Kukovič 2012, 31–32; Kukovič 2015, 36–37; Brezovšek and Kukovič 2015, 226–227).

The above-described typology, based on the criteria of the specific objectives and principles of a particular model, certainly represents an interesting perspective, but these criteria are not enough to permit a final classification of local governments: the so-called clientelist model is (no longer) suitable for applying to all metropolitan municipalities of

Southern Europe, since instead of this a model of economic development has emerged. In addition, in the municipalities of Northern Europe the dominant model is a mixture of welfare state and consumer model (Heinelt and Hlepas 2006, 25; Kukovič 2015, 37).

Hesse and Sharpe (1991) have responded with their typology to the issue of greater heterogeneity in groups when other countries are added. Their typology of relations between local and central authorities is a convincing synthesis of the aforementioned typologies. Hesse and Sharpe (1991) make a distinction between three types of local government systems that reflect both the division of powers in the provision of public services, as well as political power and influence at the local level compared to a higher level of government. In addition, they divide the Northern European group of Page and Goldsmith (1987) into two parts, and include a larger number of countries. (1) The first component of their typology is a *Franco group*, characterized by the fact that the local authority covers territorially defined communities and forms territorial structures for the dissemination of interests at a lower level of governance. The mayor is expected to represent the interests of his local community at higher levels of governance. This group includes France, Italy, Belgium, Spain, Portugal and Greece. (2) The second cluster is an *Anglo group*, including the United Kingdom and Ireland, as well as Canada, Australia, New Zealand and (in some respects) the United States of America. This group is characterized by the weak legal and political status of local authorities which are nevertheless important in the shaping and delivery of public services; local authorities therefore have more of a functional role than a political one. The weak formal political status of a local government must be considered in accordance with the principle of the national supremacy of parliament; that is, its central role in the unitary political system. This is also reflected in, on the one hand, the weak position of the mayor as a political leader and, on the other, the power of municipal administration and councillors in relation to the provision of public services. (3) The third group is a *Nordic and Central European group* and includes the Scandinavian countries, Germany, Netherlands, Austria and Switzerland. In this group there is strong emphasis on the shaping and implementation of public services by local authorities (comparable to the Anglo group). Local government is thus institutionalized (with a strong constitutional position and relatively high levels of financial independence) as an autonomous decentralized level of policy making (Heinelt and Hlepas 2006, 26; Kukovič 2015, 38; Brezovšek and Kukovič 2015, 227).

A similar typology is offered by Loughlin (2001, 5), who distinguishes between the *Anglo-Saxon group* (the United Kingdom, United States, Canada (excluding Quebec) and Ireland), the *Germanic group* (Germany, Austria, the Netherlands, Spain (after 1978) and Belgium (after 1988)), the *French group* (France, Italy, Spain (before 1978), Portugal, Quebec, Greece and Belgium (before 1988)) and the *Scandinavian group* (Sweden, Norway, Denmark and Finland). This typology includes and emphasizes broader aspects of a country's traditions – such as relations between the state and society, policy styles, prevailing approaches to the academic disciplines of public administration, and others – and is not focused solely on central-local power relationships. The latter links to only one component of Loughlin's typology (2001), which is the dimension of the form of political

organization and the form of decentralization, so we do not analyse this typology more precisely.

Both typologies – Hesse-Sharpe (1991) and Page-Goldsmith (1987) – share a common deficiency; namely, the exclusion of the new democracies of Central and Eastern Europe. Although these countries have some characteristics in common with the countries of the North and Central European Group (with regard to local jurisdiction, and the fiscal and financial discretion of local governments), theoreticians (for example, Hesse and Sharpe 1991) do not classify them into existing typologies due to their historical specificities⁴ and, in particular, due to their new radical decentralization, but rather classify⁵ them into a special group called the Central and Eastern European Group.

2.2 The horizontal power dimension

In analysing the horizontal division of power, the typologies of local government systems focus on the relations between the local legislative council and the mayor and civil servants, and allow for relevant observation (Kukovič 2011, 62–63; Kukovič 2015, 45). Researching the differences in the roles and responsibilities of the mayor, the council, and the municipal administration is important because they can be cross-examined according to the three (or four) types of local government systems already described (Hesse and Sharpe 1991), and the differences between them may even be highlighted (Heinelt and Hlepas 2006, 29). The overall general difference is reflected in the legislative division between the legislative and executive functions. From an institutional viewpoint, we can identify three main types among European local government systems. Their institutional characteristics, according to Wollmann (2008, 280–283), are summarized in the following dichotomies.

1. Monistic competence model versus dualistic competence model

The distinction between the monistic and dualistic competence model of local government is based on the distribution of competencies and responsibilities between the elected municipal council and the municipal administration. In the dualistic system, functions are separated; in the monistic system functions are united. More specifically, in the monistic model of local government, the elected municipal council is the highest decision-making body; and the municipal administration, without the authority to autonomously decide, only acts in accordance with the instructions of the municipal council which also supervises the administration. The monistic (competence) model has historical foundations in the English and Swedish systems of local government. In a dualistic system, the elected municipal council is recognized as the main policymaking body, but the head of the municipal administration has certain competencies to make decisions that do not originate from the municipal council. The dualist (competence) model developed in France during the French Revolution. It is based on the revolutionary municipal legislation of 1789, insofar as the organization of French local authority was made similar to the local parliamentary system since the distinction between the legislative municipal council and the executive function occupied by the elected mayor

(Moreau 2002, 76) was introduced at that time. While French revolutionary innovation (in all respects) was short-lived, the dualist (competence) model became the basis for local government systems in some continental European countries, such as Germany (Wollmann 2008, 281).⁶ This classification can also be used to explore additional differences; for example, (1) the role of the mayor in the implementation (or lack) of an executive function; (2) the performance of the executive function independently or together with the collective body; and (3) the manner in which the mayor is elected (Wollmann 2004, 151–152; Kukovič 2015, 45–46; Brezovšek and Kukovič 2015, 229).

2. The uniform task model compared to the dual task model

The second classification distinguishes between a single and a dual model of tasks. In a single model of tasks, all tasks that are designated as local, original tasks are exclusive decisions of an elected municipal council, which is also responsible for these public tasks. Such a system can be observed in Sweden and other Scandinavian countries, and is linked to the English system of local authorities in terms of how activity which follows tasks is assigned to local authorities by a parliamentary act (for example, decisions about issuing building permits, which is a task of the municipal council). There are two types of tasks in the dual model. First, the original tasks that originate from the traditional general powers of the local government (in accordance with the applicable jurisdiction legislation) and for which (as in a single model of tasks) the elected municipal council is responsible. Second, local authorities perform delegated tasks assigned to them by the state (central authority) for which the executive body of the local government (mayor) is responsible. The foundations of the dual model of tasks can be found in French local legislation of 1789, in which the mayor was given a dual role – he acted as a representative of local interests and also as a representative of the state. Similarly, we can identify the features of the dual model of tasks at the beginning of the nineteenth century in the municipal legislation of the German states; this also became an integral part of the German-Austrian tradition of the local government, later spreading to the local government systems of Central and Eastern Europe.⁷

In the dual model of tasks, we talk only about false (instead of true) municipalization or administrative decentralization; in contrast, the single model of tasks is characterized by true municipalization or political decentralization. The transfer of jurisdiction in the case of false municipalization or administrative decentralization has important consequences for municipalities, which are reflected both in the internal relations between the municipal council and the executive authority (the mayor), as well as in external relations with the state. From the viewpoint of internal relations, only the local executive body (the mayor) is responsible for the implementation of delegated tasks in a false municipalization, while the elected municipal council (at least formally) cannot influence the implementation of these tasks. From the viewpoint of external relationships, the local government is subject to functional (administrative) supervision, which goes beyond legal control and also addresses the suitability of local activities. The opposite is the case in true municipalization (political decentralization), since the elected council is the highest decision-making body in internal relations, while the external relationship of the local

government with the state is based only on the legal supervision of state. Although the described relationships are often blurred in practice, this distinction is important, especially in the case of conflicts (Kuhlmann and Wollmann 2014, 248–249; Kukovič 2015, 47–48).

3. *The separationist model versus the integrationist model*

The distinction between the separationist and integrationist model refers to the relationship between central and local governments and could also be classified using the previously described dimension of vertical power. However, since this division connects a single model of tasks and a dual model of tasks, it is classified as a horizontal power dimension. In a single model of tasks, the control of the central authority over the performance of the tasks of the local government is usually limited to supervision over legality. This means that, both institutionally and functionally, local and national levels are divided, which in the academic literature is also described as the separationist model. The Swedish system perfectly corresponds to the separationist model (the control of the Swedish central government over local governments is very loose, with minimal interference in operations). The English local government system was also characterized by a separationist model during the late nineteenth century, but later (during Thatcherism) increasingly took on the elements of the dual model of tasks, since the central government received the competence to strictly oversee local governments, as well as the possibility of intervening intensively in their operation. When performing the transferred tasks in a dual model, the local government falls under the control of a central government, which usually does not only involve reviewing the legality of operations, but also covers the relevance, achievements and efficiency of the tasks. This type of central government supervision over local government tends to combine both the institutional and functional levels to the point where the local level is incorporated into the central one. The latter concept is described in the academic literature as the integrationist model (Wollmann 2008, 282).

On the basis of the three model dichotomies described above, Wollmann (2008) proposes a typology of two groups (families) of countries; namely, the *English-Scandinavian family* (illustrated by England and Sweden), which has a rooted monistic competence model and the foundations of a single model of tasks and is historically connected to a separationist model (which no longer applies to the English system). The second group is a *European continental family*, illustrated by Wollmann (2008) using France and Germany, characterized by a dualistic competence model and a dual model of tasks, with inclination towards an integrationist model.

The next typology is summarized by Bäck (2005, 82–83; see also Heinelt and Hlepas 2006, 30), who (on the basis of a comparative constitutional analysis of national governments and taking into account the differences between the monistic organization compared to the dualistic, and majority decision-making compared to the consociational form of democratic decision-making at the local level) proposes a differentiation between the *assembly government, parliamentarism, presidentialism, and semi-presidentialism*.⁸

In the model of assembly government, the executive is in the hands of a proportionally assembled committee of the assembly: this represents monism in conjunction with consociationalism. This model can be found in the pre-reform era in Sweden, Norway, the United Kingdom and Poland. In the parliamentary model, the executive is in the hands of a collective body appointed by the council, but the collective body is not drawn up proportionally, but following (with some deviations) the majority principle. This involves a combination of monism and majority decision-making. The parliamentary model is typical of Italy and the Netherlands before reforms, and after reforms for Sweden, Norway and for some cities in the United Kingdom (for example, Bristol). The model of presidentialism is characterized by a combination of a dualistic and majority principle in the context of a separately elected mayor who appoints his cabinet regardless of the political composition of the council. The model of presidentialism is characteristic (after reforms) of Greece, Italy, New Zealand and Poland, and also some cities (for example Stoke-on-Trent) in the United Kingdom. The model of semi-presidentialism is found after reforms in the Netherlands and in some cases (for example, Hannover and Heidelberg) in Germany. For semi-presidentialism it is characteristic that a collective executive body, appointed by the council, surrounds the mayor. This represents a combination of dualism and consociationalism or majority decision-making, depending on how the council appoints this collective executive body.

The difference between a monistic and dualistic system is not always as clear in practice as it may seem from a legal point of view. This is especially true when executive functions are contained in different committees, or where, in a dualistic system, the local council can intervene in administrative matters and, consequently, in executive functions. Moreover, it should be emphasized that majority and consociational forms of decision-making do not depend only on the formal (legal) rules defined in municipal statutes, and/or on the electoral system. Instead, they rely on a socially determined and locally accepted *relevance logic* (March and Olsen 1989), or even on a pragmatically oriented political *effects logic*, taking into account the actual relationships at the local level. The latter also served as background for the development of Bäck's (2005) typology, but does not take into account the systematic relations between the political organization and the administration (Heinelt and Hlepas 2006, 30; Brezovšek and Kukovič 2012, 34–35; Kukovič 2015, 49; Brezovšek and Kukovič 2015, 232–233).

Based on consideration of institutional factors, Mouritzen and Svava (2002) have also developed a typology of local government systems aimed at the horizontal power dimension. Mouritzen and Svava (2002) describe apex leadership as the contact between civil servants at the top of the administrative sphere and politicians at the top of the political sphere. They assume the possibility that both groups keep a distance and carefully manage the exchange of resources with other groups. But it is also possible that there is a positive correlation between the two spheres, thus creating the combined leadership of civil servants and politicians (Mouritzen and Svava 2002, 7; Kukovič 2011, 63; Kukovič 2015, 51). The idea of the apex comes from Peter Self (1972, 150–151), and describes the events at the apex as a mix of leadership; this may be visualized as an arch

whose left part represents a political process, and whose right part represents the administrative process. At the apex of the arch there is contact that represents the critical point at which the political and administrative flows meet, and where the political and administrative influences that were created at lower levels blend together.

The reasoning of Mouritzen and Svava (2002) is based on the hypothesis that the structural features of a local government in a particular country reflect a balance or compromise between three organizational principles; namely, the *rule of the people* (unprofessional public), *political leadership*, and *professionalism*. Mouritzen and Svava's (2002) typology is based on four models:

1. First is the model of a *strong mayor*, which is characterized by a situation in which the elected mayor oversees the work of the majority of the municipal council and is also fully responsible for all executive functions. The director of the municipal administration performs tasks determined by the mayor; thus, he is subordinate to the mayor because he can recruit and dismiss him without the consent of other politicians or political bodies. In addition to the director of the municipal administration, the mayor can also employ political advisers who assist him in performing his duties. In this form of government, the principle of political leadership is strongly emphasized.
2. Second is the *committee leader model*, in which one person is an obvious political leader of the municipality and can (but may not) have the title of mayor. A political leader can have control (or not) over the municipal council. In this model, the executive powers are divided. A political leader may be responsible for some executive functions, while for others the collective body is competent; i.e., standing committees, consisting of elected politicians and the director of the municipal administration. In this model there is a uniform mix of all three organizational principles.
3. In the *collective model*, the decision-making responsibilities are in the hands of the collective body, the executive board, which is responsible for all executive functions. The executive committee consists of elected local politicians and the mayor, who presides over the committee. The greatest emphasis is placed on the principle of the rule of the people (members of the collegial body are elected by the people), while the principles of political leadership and professionalism adapt to this.
4. In the local *council-manager model*, all executive functions are in the hands of a professional administrator (city manager), appointed by the local council. Although the council has general policy oversight, its scope is limited to administrative matters. The local council is a relatively small body; the mayor, who formally presides and is responsible for ceremonial functions, manages the council. The emphasis is put on the principle of professionalism, while the principles of the rule of the people and political leadership are limited (Mouritzen and Svava 2002, 55–56; Kukovič 2011, 66–67; Kukovič 2015, 53–54; Brezovšek and Kukovič 2015, 236–237).

Mouritzen and Svava (2002) conclude that the strong mayoral model is formed in countries with a relatively small local public sector and relatively small organizations. The committee leader model is present in countries where local governments play a very important role (Sweden and Denmark), but also in countries in which the role of local government is moderately important, but serves a very large population (the United Kingdom). As a result, the directors of municipal administrations in these countries lead large organizations. For a collective model, relatively small organizations are typical. The council-manager model is found in countries with a small to moderately large local public sector where organizations employ 100 to 200 public employees (Brezovšek and Kukovič 2012, 42; Kukovič 2015, 55).

Table 1: Groupings of countries according to Mouritzen and Svava's (2002) typology

Model	Countries
Strong mayor model	France, Germany (without federal state of Hessen), Austria (six out of nine federal units), Greece, Hungary, Italy, Poland, Portugal, Spain, England (in cases where mayor is directly elected)
Committee leader model	Denmark, England (in cases of alternative arrangement), Sweden and three Austrian federal units
Collective model	Belgium, Czech Republic, Holland, Switzerland, England (in cases of leader-cabinet model), German federal state of Hessen
Council-manager model	Ireland

Source: Kukovič (2015, 56).

An additional proposal for the division of local governments is given by Berg and Rao (2005, 9–10). Analysis of the transformations of local governance structures suggests that three groups of countries may be formed. The *first group* of countries are those in which radical changes in local leadership have gone in the direction of strengthening the role of local executive authorities (for example, the Netherlands, Germany and the United Kingdom). Countries in which structural changes were limited to some individual (usually larger/urban) municipalities may be classified into the *second group* of countries (for example, Norway, Spain and Denmark). The *third group* of countries includes those in which there were no significant changes in local leadership (for example, Switzerland, Sweden, the United States of America, France and Belgium) (Kukovič 2015, 57; Kukovič and Brezovšek 2015, 239).

Taking into account the local-leadership-related discussion of Mouritzen and Svava (2002) and the idea of transforming local management structures (Berg and Rao 2005), Pawlowska and Radzik (2007) developed local leadership models based on three criteria: the 1) institutional and 2) legal conditions of local leadership, and 3) the *raison d'être* or purpose of local government, i.e. the provision of services or the expression of the will

of the local community and the adaptability of local structures to management arrangements. These criteria make it possible to distinguish between three models of local leadership (Pawlowska and Radzik 2007, 3–4):

- The *technocratic model* is aimed at providing public services with weak political influence. The formation of local policies is based on seeking consensus and on pragmatic activities. The search for consensus does not exclude political frictions that appear during elections which are later neutralized; for example, through the principle of proportionality and the appointment of collective bodies, which prevents political trade-offs. This form of leadership can be described as "dynamic stabilization": leadership rules are general and allow for a considerable degree of autonomy in institution building, while in the transformation of local leadership, internal (endogenous) factors are dominant. This model of local leadership is typical of the Nordic countries (in particular, Finland); but in the group of Central and Eastern European countries, its elements can be traced in the Hungarian system.
- The *bureaucratic model* is characterized by strong institutionalization of leadership and political relations. The local leader has the stable political support of the party, which has a majority in the municipal council; he is protected by his functions and he acts as a civil servant. Because local functions are mostly administrative in nature, this model is called bureaucratic. In addition, the institutional framework of the local leader is very conservative and immune to the factors of change. Both of these characteristics prevent changes in local leadership. Change factors are mostly external (exogenous). The bureaucratic leadership model is typical of the countries of Southern Europe, especially of France. In the group of Central and Eastern European countries, we can find the characteristics of the bureaucratic model in Estonia, Lithuania and Latvia.
- The *transformational model* is characterized by weak leadership institutionalization, but it is reinforced by clear separation and a considerable decision-making power and also executive competencies. The provision of public services and political discourse are of paramount importance to the local leader. In contrast to the technocratic model, where leadership dynamics are stable and there are almost no changes, in the transformation model the leadership dynamics are uneven. However, changes in leadership do not stem from the existing legal and institutional framework, but are the result of citizens' dissatisfaction and pressure or have emerged as an effect of national policy. This model of leadership can be found in England and Ireland, while in the group of Central and Eastern European countries it is closest to the Polish system of local leadership (Kukovič 2015, 58–59; Brezovšek and Kukovič 2015, 239–240).

3 Conclusion

In Europe, there are very different regimes or models of local authorities that differ in size, structure, tasks, and relationships with the state. A common feature is their emergence from their own traditions and historical development. It is expected that different models of local authorities will also be preserved in the future, as there cannot

exist only a single model either within individual federal states, let alone at the pan-European Level.

Understanding the importance of local authorities when assessing the democratic nature of a society is extremely important, as local authorities are at the centre of professional and political attention. Local government denotes the right and ability of the local community to prescribe and regulate a significant proportion of public affairs of a local nature within the bounds of the constitution and laws according to its own responsibility and in the interests of the local population (Vlaj 2005, 25). The true role of local systems is thus located in the vertical division of power. With a division of power between the state and local communities, the power of the state (centre) is limited in a way that there is less opportunity for its alienation and abuse. Such a system in a democratic country allows public services to be more effective and efficient than if all power was centralized (Brezovšek and Kukovič 2015, 221–222). There is a constant focus on the individual in terms of the need to satisfy their modern needs and the quality of their life in their place of residence. Also increasing is the importance of cross-border networking and the international cooperation of local communities. Local communities are not closed systems, but systems that are open to the outside, to the wider local community, the state, the European Union, and also to global society.

Notes:

¹ Countries that decide to ratify the European Charter of Local Self-Government accept their obligation to incorporate at least two-thirds of its provisions.

² Also ‘*Boosterism*’ or the ‘*Growth machine*’ model (Heinelt and Hlepas 2006, 25).

³ See also Peterson (1981) and Svara (1998).

⁴ Here we refer to the tradition of past political regimes and arrangements, dependence on the democratic path, and the transition and consolidation of democracy.

⁵ See *European Mayor: Political Leaders in the Changing Context of Local Democracy*, ed. Bäck *et al.* (2006).

⁶ The dualistic (competence) model was especially emphasized in the Prussian Town Act of 1808, in which the dualistic collective form was drawn up, as well as in other German states of the time, where a dualistic (competence) model was adopted in the form of a municipal council and individual mayor.

⁷ Here, too, we refer to the example of building permits that, in accordance with the dual model of tasks in terms of the responsibility of the local authority, have been a delegated task in France and Germany, which (in accordance with the dualistic competence model) the local executive branch of the authority or administration (the elected municipal council) has no influence or control over in terms of responsibility for implementation.

⁸ We highlight the problems of adopting the terms assembly government, parliamentarism, presidentialism, and semi- presidentialism, which are increasingly being used in European scientific terminology, for the purpose of studying and naming the typologies of local authorities. Due to the diversity of state and local political composition, it should be emphasized that the typographical classification of local authorities is only metaphorical.

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