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Andreas Fahrmeir ^a, H. S. Jones ^b

^a Goethe University, Frankfurt am Main,

^b University of Manchester,

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Space and belonging in modern Europe: citizenship(s) in localities, regions, and states

Andreas Fahrmeir^{a,*} and H.S. Jones^b

^a*Goethe University, Frankfurt am Main;* ^b*University of Manchester*

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Does citizenship exist beneath the level of the nation-state? An enduring historiography insists on the essentially national character of modern citizenship, but this article argues on the contrary that locally defined identities have continued to exercise an important influence on the social and political rights of citizens. These local identities are not just relics of composite states with different membership criteria; rather, spatially complex citizenship is the norm.

Keywords: citizenship rights; local variation of; administrative uniformity and diversity; regions in nation states

What place is there for citizenship in a set of essays exploring the tensions between nations, regions and municipalities? Everyday experience suggests that today citizenship is quite simply a national category, and that sub-national space is irrelevant to the definition of the rights and duties associated with it. When citizenship matters most – when we cross international borders or apply to consulates for permission to travel – citizenship simply has no local or regional inflection whatsoever. Where the allocation of resources and administrative powers, struggles over cultural homogeneity and the structure of political networks are concerned, subdivisions within modern nation-states are clearly visible and have been much studied. But, with regard to nationality, the historiography has mostly focused on the definition of the external boundaries of citizenship and the effect of inclusion or exclusion on particular ethnic and religious groups. It has tacitly accepted that citizenship is a national category with few local or regional variations.¹ This assumption rests on a historical interpretation which sees a profound break between early modern membership categories and those used by modern states. Early modern states deployed local or social membership categories linked primarily to rank, profession, estate, town or locality.² Modern states, by contrast, seem universally to adopt national membership categories which emphasise either ethnicity (for example, by largely attributing citizenship as a consequence of descent from a citizen) or geography (for example, by making the place of birth the decisive attribute). Far from questioning the salience of national citizenship in the modern world, historians have tended, if anything, to push the caesura further back: Peter Sahlins's innovative work has dated it to a 'citizenship revolution' in eighteenth-century France.³

In the face of this historiographical orthodoxy, this essay will argue that in modern Europe the practice of citizenship has often been determined in important ways by sub-national space.

*Corresponding author. Email: fahrmeir@em.uni-frankfurt.de

The rights of citizenship have by no means been homogeneous within the nation-state. The essay will range widely, drawing on select examples from the histories of Germany, France and Britain; but it will focus on two particular sets of rights associated with citizenship, political participation and longer-term access to social services, and it will briefly consider naturalisation.⁴ The examples adduced to sustain this argument are exemplary rather than comprehensive: they are intended to stimulate debate rather than to close the argument. But we would suggest that a fuller examination of the issues we raise will support the conclusion that the exercise of the rights of citizenship has remained so entangled with issues of place that there are grounds for questioning the identification of modern citizenship with the nation-state. We intend to apply our argument to the range of citizenship rights, which include – in T.H. Marshall's frequently cited definition – rights to economic activity, political participation and social benefits.⁵ As local membership categories continued to be significant for the attribution of these rights throughout the era of the nineteenth-century nation-state, sub-national space continued to have an important role in determining the rights national citizens enjoyed.

Perhaps our case is hardest to make in respect of political rights. The French Revolution is often taken to mark the inauguration of modern politics: the transfer of the locus of sovereignty from crown to nation coincided with the transfer of the locus of citizenship from municipalities to the nation. And in this respect its impact went far beyond France. 'The French Revolutionary regime and its collaborators in the occupied territories', writes Prak, 'centralized government and administration, and created new ties between themselves and their subjects, in the form of modern citizenship'.⁶ At the outset of the Revolution, the Abbé Sieyès – its most clear-sighted theorist – proclaimed the importance of instituting a form of representation which explicitly excluded the representation of sub-national entities with their individual sets of laws, customs and rules of representation similar to the *ancien régime's* 'pays'. 'FRANCE must not be a collection of small nations', he declared. 'She is a unique whole.'⁷ Sieyès himself was one of the architects of the redrawing of the administrative map of France, in which the historic provinces were replaced with departments lacking roots in the past so as to expunge memory of the *ancien régime* and attachment to 'small nations' within the nation: 'to melt down the diverse peoples of France into a single people, and the diverse provinces into a single empire'.⁸ Sieyès's projects for administrative reform and for a radically new understanding of political representation both rested on a distinctive vision of citizenship, born of the struggles over the composition of the Estates-General in 1788–1789. Privilege was the antithesis of citizenship, and in their civic life Frenchmen must be stripped of all that set them apart from their countrymen. 'Those interests by which citizens resemble one another are therefore the only ones that they can treat in common, the only ones by which and in whose name they can demand political rights or an active part in the formation of the social law', wrote Sieyès. 'They are therefore the only ones that make a citizen someone who can be *represented*.'⁹

The question we have to address here is this. Was Sieyès's the paradigmatically modern perspective on political representation and the exercise of the political rights of citizenship? Have electoral constituencies generally functioned simply as arbitrary sub-divisions of the national whole? Did they continue to function as sub-national communities with a right to political representation at the national level for much longer than the advocates of a revolutionary caesura suggest? Or do modern political practices combine both homogeneity and diversity in more complex arrangements?

Charles Tilly – a pioneer in the historical study of the theory and practice of citizenship – is trenchant in his answer to this question. 'Between 1750 and 1850', he writes, 'Europe's consolidating states did not so much absorb these earlier forms of citizenship as subordinate or even smash them in favour of relatively uniform categorization and obligation at a national scale'.¹⁰ Rogers Brubaker, likewise, stresses the opposition between political modernisation and

an older notion of municipal citizenship: 'the modern state and state citizenship were constructed *against* urban autonomy and urban citizenship'.¹¹ Are Tilly and Brubaker right?

Certainly, their chronology can be debated. Estate-based representation remained typical of political citizenship in central, east-central and Northern Europe in the first half of the nineteenth century; it continued to exist in upper houses, the Habsburg lands, or the two Mecklenburg well beyond 1848. Moreover, Sieyès's vision of national citizenship did not gain intellectual dominance. Sieyès had an important influence on the development of continental European public law in the nineteenth century – constitutional authorities such as Adhémar Esmein, the doyen of French constitutionalists in the early Third Republic, cited him as a fundamental authority for his analysis of 'modern liberty', in which 'national sovereignty' played a pivotal role,¹² and Sieyès attracted the protracted attention of a succession of German constitutionalists. Yet, his abstract concept of citizenship – sometimes, but misleadingly, referred to as a 'Jacobin' concept because of its close ties to the idea of unitary sovereignty – was subject to waves of criticism throughout the nineteenth century and much of the twentieth century.¹³ The early nineteenth-century liberals known as the *Doctrinaires* – notably Royer-Collard and Guizot – expounded a concept of the 'sovereignty of reason' which – difficult as its positive features might be to pin down – was unmistakably directed against the 'Jacobin' idea of sovereignty which was thought to derive from an older, absolutist tradition.¹⁴ The *Doctrinaires* were echoed, from a very different point in the political spectrum, by the federalist Proudhon, and were invoked as authorities by the early twentieth-century constitutional jurist Léon Duguit, who set about systematically dismantling the reigning doctrines in public and private law.¹⁵ These were not just isolated voices in the wilderness. The Sieyèsian model of representation was opposed on the Left by proponents of direct democracy, who tended to look to the commune as the locus of political identity; and on the Centre and Right by those who held pluralistic conceptions of the nation, and who argued that that messy reality needed to be represented. Liberal and conservative critics of the political culture that had led France to lurch from the democratic republicanism of 1848 to the democratic despotism of Napoleon III argued that while the institution of universal suffrage could not be undone, the exercise of political rights needed to be grounded much more firmly in the local community by means of, for example, stricter registration provisions. This was one of the favourite proposals of the Batbie Commission (or Commission des Trente), which reported to the National Assembly in 1874 and proposed a lengthy residence requirement for registration. Whereas those born in the commune in which they were to vote would have to demonstrate six months' residence only, those voting in a commune other than that of their birth would have to show three years' residence.¹⁶ As Batbie, the Commission's chairman, put it, this prolonged residence qualification was justified because it would purify the suffrage by excluding 'the nomadic population which has no home and deserves no trust because it has no ties'.¹⁷ The Commission's proposals were, for the most part, blocked, but its preference for the *scrutin d'arrondissement* – or the single-member constituency system – prevailed, and it is illuminating to see some of the arguments advanced in its favour. Albert de Broglie – grandson of Madame de Staël, and scion of a famous Orleanist family – argued that the *arrondissement* possessed a certain moral unity, and urged that the quest for equality of electoral districts should not lead to communes being arbitrarily moved from one *arrondissement* to another.¹⁸

While the 'Jacobin model' continues to reign supreme in the official discourse of French republicanism, it could be argued – and often has been argued – that the official discourse is belied by the practice of politics in France and other unitary nation-states. Locality remains crucial, for instance, to the power-base of national politicians, as famous instances of the *cumul des mandats* demonstrate. Edouard Herriot, three times prime minister in the 1920s and '30s, continued to serve as mayor of Lyon from 1905 to his death in 1957, interrupted only by the

German Occupation. More recently Jacques Chirac's position as mayor of Paris – an office he held from the time of its re-institution in 1977 to his election to the presidency in 1995 – was one he was famously reluctant to lay down. Moreover, in France as elsewhere,¹⁹ political citizenship rights were not one and indivisible. They could be related to wealth, rank or other individual attributes (for membership in the upper house), and were often defined differently for various levels of the administration (local, regional or national). While the attempt to tie all political participation rights to a single national citizenship was a notable characteristic of franchise reforms in the twentieth century, these reforms have not always succeeded in addressing the problem that votes emanating from different localities are assigned different weights because of unequal constituency boundaries. More recently, European Union regulations on the participation of EU citizens in some elections – but not in others – have once again caused the reach of local and national citizenship to diverge significantly.

From a constitutional point of view Britain represents the obverse of the French tradition. If the French Revolution provides us with the clearest example of a 'citizenship revolution', Britain contrived to achieve political modernity without experiencing anything resembling such a revolution – so much so that the very idea of national citizenship has often seemed like an alien import into British political discourse. This makes our point much easier to demonstrate for the nineteenth century, as locality remained important not only in political practice, but also in electoral law throughout the nineteenth century. Historically, county and borough constituencies were deemed to embody communities, and in that capacity they sent representatives to Westminster. Up to 1832, the borough franchise varied dramatically according to local usage. The diversity of local practice was staunchly defended by Tories such as Sir Robert Inglis, who told the House of Commons in March 1831 that 'it is the very absence of symmetry in our elective franchises which admits of the introduction to this House of classes so various'.²⁰ In 1832 it was standardised, and many boroughs which had ceased to embody sizeable communities were disfranchised; but boroughs and counties continued to be of radically different sizes, and not until 1885 was the principle accepted that each Member of Parliament should represent a roughly equal number of electors. Anomalies survived longer in the UK than elsewhere – for example, the university members survived until the middle of the twentieth century – but a modernist could argue that by 1948, when the Representation of the People Act abolished plural voting, the principle that political rights were vested in citizens qua citizens was accepted.

But it would be a mistake to accept this line of argument without qualification. The language of citizenship was a powerful presence in British political discourse throughout the nineteenth century and well into the twentieth, but it was typically tied to a strong sense of locality and a defence of communal identities. Recent historians have stressed that the representation of community – not of individuals – was at the heart of British politics, especially progressive politics, in the Victorian period and after.²¹ That was the context in which the language of civic virtue flourished. In terms of electoral law, registration provisions – introduced in 1832 – remained and remain central to the operation of the British electoral system, and they, in effect, give priority to residence in a particular place as the building block of national citizenship. Some interesting anomalies have survived as a result. It is, for example, permissible to be on the electoral register in several places, and *in local elections* to vote more than once, in different local government areas. Students, in particular, can benefit from this provision, and when UK local elections were rescheduled to coincide with the European elections of June 2004, problems arose in several university cities (notably Oxford) where students who had cast a postal vote in their parents' local government area voted in person in their university city too, and notices had to be posted at polling stations to bar them from doing the same in the election to the European Parliament.²² It is unlikely that a similar problem arose anywhere else in the European Union, for in most member countries the practice of dual registration would be thought very odd indeed.

It may be a corollary of the enduring importance of local registration in the British system that, intriguingly, British electoral law has been notably reticent about the national character of the suffrage: the exclusion of aliens from exercising the right to vote was buried deep among the minute provisions of the 1918 Reform Act. This was, in fact, the first Representation of the People Act to make any reference to the status of aliens. Previous acts had relied upon the common law interpretation of the legal incapacity to vote, which by the early nineteenth century the courts had definitively agreed included aliens.²³ Moreover, the definition of alienage in British electoral law has not conformed to that in other areas; whereas citizens of the Commonwealth countries are excluded from residence rights (and, therefore, social rights), those resident in Britain continue to retain their right to vote in local and national elections. Thus, the connection between nationality and the right to vote was not regarded as a fundamental principle of electoral law, but rather as a qualification of the fundamental principle of a suffrage based on residence: that is, on locality. The contrast with French practice is striking: from the Revolution onwards, legislation defining the right to vote gave pride of place among the qualifications for the right to vote the criterion of nationality: 'd'être Français ou devenu Français'.²⁴

The key point to emphasise here is not that remnants of a pre-modern system of representation founded on locality have survived into the late modern period or even to the present. It is, rather, that in most states in most periods conceptions of the spatial dimension of citizenship have been complex and have been reflected in hybrid systems of political representation. Localism and transnationalism have their place in representative systems today, and are often entangled.

With regard to social citizenship rights, the situation is at once more straightforward and more complex. In many countries, Marshall's term does not correspond all that well to the justification or the organisation of pensions or assistance schemes, healthcare, or primary and secondary education. Social services are often provided by actors only indirectly related to the state, such as insurance companies, charities and voluntary societies, or churches. It is therefore hardly surprising that services available to members of the citizenry vary across localities, as the quality of schools or hospitals may depend to a significant degree on non-public funding. What we therefore propose to focus on is the narrower issue of the role of local membership criteria for access to publicly funded services.

To this day, local services, such as public libraries, require proof of residence in a locality or its immediate surroundings. While tying the price of museum admissions to nationality would be illegal in the European Union, distinctions between locals and outsiders can still be made. In some cases, even the cost public transport depends on one's place of residence. In 1990s Berlin, for instance, season tickets were priced differently for residents of the city's eastern and western parts.

For individuals who possess a country's citizenship, the local dimension of social citizenship rights is, however, barely visible. The boundary which separates locals from others has become easy to cross; all that is required is registration with the local police or another authority in charge of residence records, such as a council tax office. Access to public services tends to follow either on registration or after a short administrative delay. Only admission to council housing or eligibility for in-state tuition rates commonly require longer waiting periods. Nevertheless, the recent announcement by some German *Länder* that they planned to exempt (only) state residents from university fees came up against the reality that residence follows from a process of registration entirely at the discretion of citizen students, not local or regional authorities.

The impact of a move within the country on social citizenship can thus appear relatively slight. Variances in the cost of living may affect the value of social citizenship but not the fundamental right to it, though the quantity and quality of public housing, the number of

specialised hospitals or the accessibility of higher education can differ dramatically from place to place.

This state of affairs appears to document the victory of central over local government in the struggle over where decisions on community membership should be made for the purposes of social rights. Freedom of movement within countries (or the European Union) has become a basic right. Non-citizens have to apply to national authorities – generally acting through consulates – for admission to residence in a country, rather than in a particular locality (though different rules apply to asylum applicants). With the nation-state firmly installed as the gatekeeper of national citizenship and residence rights, central governments appear to have emerged victorious from a struggle with local authorities which lasted for much of the nineteenth and early twentieth centuries. In most European countries, poor relief (long the key element of social citizenship) remained a predominantly local affair until at least the 1920s and often well into the 1930s: localities determined eligibility for relief, and paid for it from local donations or tax revenues. But if localities were obliged to provide relief for ‘their’ poor, as central state legislation on settlement and local membership mandated by making it impossible to remove poor citizens from a locality without ensuring that another locality would accept them, then, the localist argument went, they had to be able to limit the influx of actual or potential paupers who might demand succour from communal wealth without having contributed something to it. Put differently, freedom of movement could be seen as an indirect expropriation of localities. Propertied residents of wealthy villages and towns were particularly concerned that generous benefits for insiders could attract outsiders at risk of poverty. This could lead to two – equally unpalatable – results: an increase in poor rates or harsh conditions for legitimate members of the community impoverished by illness or old age. Central governments countered that local parochialism limited countries’ economic potential, prevented the creation of a national consciousness by erecting arbitrary barriers between fellow citizens, and delayed the reintegration of criminals into society, because tying them to a locality where their biography was well known would prevent them from making a new start in life.²⁵

The result of the debate was, on closer inspection, a compromise rather than an all-out victory of the central state. Details varied from country to country and within countries, but the overall trend was clear. Local rights to reject newcomers were indeed all but abolished. The test of local membership in the *ancien régime*, formal admission, was first replaced by a lengthy period of residence, then by registration. Austria and Switzerland relied on formal procedures of admission to local membership, certified in ‘certificates of domicile’ of one type or another, which localities could refuse to issue, until the interwar period or beyond. France, Prussia and Britain treated domicile or ‘settlement’ as a result of actual residence from the later nineteenth century, though access to relief could still require at least one year of formal residence. Today, certification of domicile is either part of national registration systems, or, as in Britain, tied to the payment of local taxes. In return, central governments assumed the lion’s share of localities’ financial obligations to local residents in need of assistance through the introduction of national systems of social insurance coupled with subsidies to local welfare systems.

In France, for example, welfare relied all but exclusively on local taxes and private donations until the very end of the nineteenth century, and this created substantial local variations in levels of relief. Large cities tended to be relatively generous, while rural communities tended to be quite restrictive. Variations concerned not just the level of payments or the type of accommodation individuals could expect, but also how localities assigned domicile: some focused on national citizenship, others on long-term residence and local integration.²⁶ In the interwar period, this issue became more important as major cities began fund hospitals, surgeries and other social welfare institutions. Though such institutions were not available in the countryside, they were initially intended mainly, if not exclusively, for the residents of the cities which paid for them from local

tax income.²⁷ The introduction of national health insurance has reduced the degree of concern, though from time to time more or less comprehensively documented cases still emerge in which local authorities create informal boundaries of membership, for example by removing homeless people from city limits.

For non-citizens, the impact of local variations may remain significant, and this results from the way in which the boundary between citizens and others is administered. Modern histories of nationality law tend to see the French Revolution as the key moment when the decision on admission to national citizenship passed to a national authority. The first post-1789 French citizenship edict, however, still considered the acquisition of the 'droit de bourgeoisie' in a town as an equivalent to naturalization, and laws which provided for the automatic naturalization of some residents effectively placed admission to national citizenship in the hands of the localities which permitted their presence until the late 1790s.²⁸ In the US, the question of whether states or the federal government had the power to determine the rules for naturalization remained at least partially unanswered for much of the nineteenth century.²⁹ In Britain, a number of institutions retained the right to turn aliens into citizens until well into the nineteenth century: the Bank of Scotland, a number of Irish corporations, and, effectively, the City of London. In German states, any bureaucracy could turn aliens into citizens by appointing them to an office (as the case of Hitler, naturalized by appointment as a civil servant in Braunschweig in spite of a ban on the naturalisation of convicted felons, famously illustrates³⁰), while in Austria universities retained a similar right even after 1945, as appointment to a chair resulted in Austrian citizenship. More significant still was localities' right to comment on naturalisation applications. In nineteenth-century German states, the power to naturalise rested with the central government, but officials depended on recommendations from local authorities, who would assess an individual's record and economic prospects. After the foundation of a German Empire in 1871, the power to admit aliens to citizenship continued to rest with individual German states, not a national bureaucracy; a right of veto against naturalisations approved by another state only appeared in 1913. This remained the case in the Weimar Republic, and a careful reading of the West German state constitutions drafted in 1946 shows that many retained the assumption that citizenship was both a regional and a national attribute.³¹

Does this matter? In practice it matters most to those whom it concerns: individuals outside the national community seeking to become insiders by naturalisation. In Germany, the success rate of applications for naturalisation depends significantly on where they are submitted; different *Länder* literally apply different tests. Similar variations have been documented for French prefectures, whereas the more centralised (and more liberal) British naturalisation system appears to operate with fewer regional variations.³²

We would suggest that the conclusion from the evidence we have presented should not be that progress towards a modern nation-state has simply been incomplete, because echoes of pre-modern localisms remain. The focus on the practical relationship between national and local citizenship raises questions about the association of the nation-state with openness and of local control with restrictions and corporatism. When localities appear as providers of services reserved to members, they can easily be portrayed as opposed to change in general and newcomers in particular, creating a need for more national control. By contrast, in their role as gatekeepers of national citizenship, or when determining the extent of political rights, institutions of local or regional governance were frequently more generous than those at the centre of nation-states. It was in order to curb regional generosity in naturalisation, particularly of Jewish applicants, that Prussia pressed for state veto rights against naturalisation in 1913.

Regarding the relevance of local dimensions and concepts of citizenship for Europe's contemporary debates on the future of welfare states, internal freedom of movement and European integration, there is still a lot of ground to cover before satisfactory answers will be

possible. Empirically, we still know very little about which agencies in which countries determined access to citizenship rights in practice at various times. By some accounts, the importance of localities may be once again on the increase. Debates in the early stages of the 2008 US presidential election highlighted the existence of municipal immigration policies which can, for example, recognise consular registration certificates (which indicate illegal residence) as valid ID in interactions with local authorities, including the police, in clear contravention of national immigration law and policies.³³ The recent 'visa scandal' in Germany has highlighted the role of a single judicial district, Cologne, in turning generous practice at some consulates into a national scandal.³⁴ The attempt to enforce boundaries of national citizenship often comes up against local concepts of membership, fairness and justice, for instance in the practice of church asylum. It is possible that the divergence between official policies of membership and national, regional and local practice, already quite significant within the European Union, will become yet greater, with more initiative shifting to localities implementing central decisions.

The economic boundaries of citizenship are another important issue. At least in part, local variations in conceptions of citizenship reflect competition between visions of citizenship as an expression of membership in a national community and citizenship as a reflection of property ownership in a local community. It is probably not entirely accidental that the two elements – the local definition of citizenship boundaries, and the tie between property and citizenship – coincided in the recent reform of a local franchise. The City of London, under an Act of 2002, extended its franchise to include incorporated businesses alongside the existing electorate of sole traders, partners of unincorporated firms, and the 7500 or so local residents. This move, which increased the number of voters by about five thousand, was praised by the *Financial Times* as a 'democratic development'.³⁵ The Act stipulated that the corporations must nominate electors who are entitled to vote in public elections in the UK: that is, they must be EU or Commonwealth citizens, and, if not UK citizens, must be resident in the UK. It also prohibited each corporation from mandating its electors. Nevertheless, the corporations in question are often multinational entities whose policies are shaped by individuals who are not members of the political community in the locality – or, perhaps, soon, localities – where they exercise political influence through votes or other means. What this means is, however, unclear. We might reasonably interpret this 'democratic development' as a further erosion of the local guardianship of boundaries of citizenship rights; on the other hand, we could also see it as a reassertion of the power of localities to define boundaries of citizenship in ways which they find most useful.

Notes

1. Among the best recent examples for historical studies of citizenship laws are Patrick Weil, *Qu'est-ce qu'un Français?* and Dieter Gosewinkel, *Einbürgern und Ausschließen*.
2. Groeber, *Der Schein der Person*.
3. Sahlins, *Unnaturally French*.
4. As short-term care has usually been available to travellers in acute distress with little regard for their place of origin or ties to the community in which they found themselves, consideration of long-term access to material relief or medical treatment would seem to be the key indicator of access to social citizenship rights.
5. Marshall, "Citizenship and social class," 1–85.
6. Prak, "Burghers into citizens," 403.
7. Sieyès, "Dire sur la question du veto royal," 237.
8. Quoted by Forsyth, *Reason and Revolution*, 152.
9. Sieyès, "What is the Third Estate?", 156.

10. Tilly, "A primer on citizenship," 601.
11. Brubaker, *Citizenship and Nationhood*, 42.
12. Esmein, *Eléments de droit constitutionnel*, e.g. I, 318.
13. See, for example, Hazareesingh, ed., *Jacobin Legacy*, especially the introduction, and Rosanvallon, *Le Modèle politique français*.
14. Craiutu, *Liberalism under Siege*, ch. 5.
15. On Duguit, see Jones, *The French State in Question*, ch. 6, and Laborde, "Pluralism, Syndicalism and Corporatism."
16. Kahan, *Liberalism in Nineteenth-Century Europe*, 117.
17. *Journal Officiel*, 31 March 1874, Annexe 2320.
18. Archives Nationales C*II 611: Commission relative à l'examen des lois constitutionnelles, 13 January 1874.
19. For example Neuman, *Strangers to the Constitution*, 70.
20. Hanham, *The Nineteenth-Century Constitution*, 141.
21. See notably Biagini, *Citizenship and Community*, 1.
22. *Cherwell*, 11 June 2004.
23. Seager, *The Reform Act of 1918*, 48; Disney, *A Practical Abridgement of Election Law*, 71; Evans, "The political status of aliens," 29–30.
24. Décret portant constitution des municipalités, du 14 décembre 1789," reprinted in Aberdam *et al.*, *Voter, élir pendant la Révolution française*, 153.
25. For a fuller treatment of the debate and its influence on practice, see Beck, *Origins*; Komlosy, *Grenze*; Hennock, *Welfare State*; Smith, *Creating the Welfare State*; Gueslin, *Les gens de rien*; Nathans, *The Politics of Citizenship*.
26. Hatzfeld, *Du paupérisme à la sécurité sociale*; Gueslin, *Les gens de rien*, 29–59.
27. Smith, *Creating the Welfare State in France*, esp. 86–90.
28. Weil, *Qu'est-ce qu'un Français?*, 26–37.
29. Kettner, *The Development of American Citizenship*, 251.
30. Kershaw, *Hitler. 1889–1936*, 238, 362.
31. Trevisiol, *Die Einbürgerungspraxis im Deutschen Reich*; Fahrmeir, *Citizens and Aliens*, 63–99; Kolonovits, "Rechtsfragen des Wiedererwerbs der österreichischen Staatsbürgerschaft," 66–89; Zedtwitz, ed., *Staatsbürgerschaftsgesetz 1965*, 14f. and passim. The most prominent documentation of the assumption of the existence of a state citizenship in postwar West Germany is articles 6 and 7 of the Bavarian constitution.
32. Hagedorn, *Wer darf Mitglied werden?*, 151–69; Weil, *Qu'est-ce qu'un Français?*, 271.
33. *International Herald Tribune*, August 26, 2003, 5.
34. See, for example, http://www.tagesschau.de/aktuell/meldungen/0,1185,OID4070242_REF1_NAV,00.html (accessed July 4, 2006).
35. Blitz, "The Medieval Relic Ruling a Modern City."

Notes on contributors

Andreas Fahrmeir is Professor of Modern History at the University of Frankfurt/Main. His research interests include the comparative history of citizenship and migration policies as well as the history of European middle classes, and his recent publications include *Citizenship: The Rise and Fall of a Modern Concept* (New Haven and London: Yale University Press, 2007).

H.S. Jones is Reader in Intellectual History at the University of Manchester. His research interests embrace French and British intellectual history, modern political thought, and the cultural history of European politics. His most recent book is *Intellect and Character in Victorian England: Mark Pattison and the Invention of the Don* (Cambridge: Cambridge University Press, 2007).

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RÉSUMÉ *Peut-on être citoyen au-dessous du niveau de l'Etat-nation? A l'encontre d'une historiographie durable qui insiste sur le caractère essentiellement national de la citoyenneté moderne, dans cet article on soutient que les identités définies au niveau des localités exercent toujours une influence importante sur les droits sociaux et politiques des citoyens. Ces identités locales ne sont point que les restes d'une ancienne conception de la citoyenneté. Du point de vue spatial, la citoyenneté est presque toujours complexe.*