# Do we care about monuments' care?

A Research to the Quality of Policy Considerations in Environmental Strategies of Dutch Municipalities for Monuments' care



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Master's Thesis Comparative Politics, Administration & Society

Nijmegen School of Management

Radboud University Nijmegen

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# Preface

Before you lies my Master's thesis: '*Do we care about monuments' care?*'. I conducted this research as the final step of the Public Administration master Comparative Politics, Administration and Society at the Radboud University.

I could not have done this without the help of others. First of all, I want to thank my supervisor Dr. Marlies Honingh, who always made time to help, listen and advise me during the process. Without her guidance, expertise and support this would not have been possible. Second, I want to thank my respondents for taking the time to speak with me and for their openness during the interviews. Third, I want to thank Mathijs Ambaum, Daniela Villalba Belisario, Pauline Stevens, Eefje Philipsen and Niek Stevenson for reading my thesis and offering feedback. Last, I want to thank my friends and family for their mental support and their patience with me during the past months.

Enjoy reading

## Abstract

The Dutch Environment and Planning Act creates an enormous overhaul of spatial legislation, demanding policy integration and public participation, to ensure a higher quality of spatial plans. This thesis analyzes whether the environmental strategy, a new spatial instrument introduced by the Environment and Planning Act focused on policy considerations, does in fact provide a high quality for monuments' care, a more vulnerable spatial domain. In addition, this thesis analyzes whether policy integration and public participation have played a part in the quality of policy considerations found. Based on the literature, the quality of policy consideration is regarded as a multifaceted concept, composed of the acceptability, reachability and legality of the considerations made. On the one hand, policy integration could contribute to quality by stimulating synergy. On the other hand, policy integration could be harmful as attention might be redirected during the integration of policy domains. Public participation is potentially beneficial for the quality of considerations, but this hinges upon the issue of monuments' care being discussed during the participation. A combination of content analyses of 33 existing environmental strategies of Dutch municipalities and face-to-face semi-structured interviews in nine municipalities is used. The results based on the content analyses show that the quality is highly differentiated, with only five municipalities having a high quality of policy considerations for monuments' care. Based on the interviews it became clear that all municipalities had additional considerations, which had not made it into the environmental strategies. In addition, the interviews showed that policy integration could both have negative and positive consequences for the quality of considerations, while public participation can have benefits if citizens find monuments' care relevant. The developed list of necessary policy considerations to determine the quality of considerations for monuments' care in environmental strategies can be of use to practitioners in both evaluating their own environmental strategy and guiding future considerations for monuments' care. Moreover, the findings point to the complexities of participation for an integrated strategic document, creating new questions about the usefulness of participation in different settings for both practitioners and scientists.

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# **1. Introduction**

Early 2012 the first Rutte cabinet announced its intention to introduce a new spatial law, aimed at making spatial policy in the Netherlands more simple and effective. The new law, which was named the Environment and Planning Act (EPA), intended to repeal fifteen existing laws (Volkskrant, 2012) and replace them with one integral law to promote spatial quality. At the time the consequences of the EPA were not yet fully apparent and responses were limited. It was not foreseen that the EPA would become the largest legislative change in the Netherlands since the introduction of the constitution in 1848 (Binnenlands Bestuur, n.d.). When the EPA finally took the last hurdle to become law in February 2020, the law repealed 26 laws, 4700 articles and 120 Orders of Council. 'Just' 1 law, 350 articles and 4 Orders of Council replaced this massive body of legislation in the EPA (Vroegindeweij, February 2020).

The Minister of Infrastructure & Environment of the first Rutte Cabinet, Schulz van Haegen, offered various reasons for the necessity to replace most of the existing spatial laws by the new EPA. First, all sectors within spatial policy have developed their own approach for creating spatial quality, which in some cases led to highly contradicting legislation. Second, the sectoral laws were highly detailed making spatial law highly complex, difficult to understand but also difficult to apply, leaving the outcome of spatial procedures uncertain (Ministerie van Infrastructuur & Milieu, 2013). Third, the specificity and tightness of existing legislation created a situation of optimized certainty, but leaving little room for flexibility and for dynamics not captured within the existing laws (Ministerie van Infrastructuur & Milieu, 2013; 2014).

In addition to problems with the existing legislation itself, new challenges such as sustainable development, climate change and demographic societal changes have created pressures on existing spatial practices. As a consequence, spatial planning activities were and are still becoming evermore intertwined, creating the demand for cross-sectoral integral approaches to spatial planning (Ministerie van Infrastructuur & Milieu, 2013, pg. 17-18). The combination of societal and spatial developments and the increasing complexity of spatial legislation created the wish for the new EPA.

The EPA aims to overcome the problems with previous legislation first by increasing the quality and speed of decision making, demanding clear targets for spatial quality and creating more room for development and flexibility. Second, spatial plans and assessments are integrated between sectors, avoiding contradictions, reducing uncertainty and increasing clarity. Third, the EPA is a framework law which means it aims for the reduction of administrative burdens and leaves ample discretionary space for local interests and flexibility for development. Consequently, the national government offers boundaries for what is possible in an objective and measurable way, creating both transparency and room for local flexibility. Lastly, the demands placed on citizens to provide evidence for the spatial initiatives they want to take is greatly reduced, while their involvement is greatly enhanced by demanding participation for all spatial plans (Tweede Kamer der Staten Generaal, 2011 p. 2; Tweede Kamer der Staten Generaal, 2012 p. 9-10)

The assumptions guiding the EPA, however, raise three questions on the benefits of the EPA for spatial domains less readily integrated and not in the spotlight of attention. First, the nature of the EPA as a framework law means there is ample local discretionary space and flexibility for lower tiers of government. Consequently, Dutch municipalities are given the opportunity to have an expanded say in what the municipalities deem relevant themes for their own spatial policy. On the one hand, this means the nature of the EPA as a framework law offers municipalities the opportunity to shift attention to issues deemed pressing and relevant in the local circumstances, and to devote attention to spatial domains previously not strongly incorporated in spatial legislation. Therefore, 'hot' spatial domains such as sustainability, smart mobility and health stand to profit from the EPA as it offers the possibility to actively incorporate these themes as relevant parts of spatial legislation, while previously this was difficult due to the strict guidelines guiding themes in spatial plans. On the other hand, the nature of the EPA as a framework law means that spatial domains which are not in the spotlight of attention lose exactly those legally more inflexible procedures that ensured that less 'hot' spatial themes would be covered in spatial plans.

Second, the assumption behind the EPA on the benefits of policy integration focuses on the reduction of uncertainty, the production of synergy and the avoidance of contradictions (Tweede Kamer der Staten Generaal, 2012 p. 9-10). Spatial domains which are high on the agenda and are easily coupled to other spatial domains, such as a combination between housing and sustainability, will more readily also reap the benefits of this integration. However, spatial domains which are not high on the agenda, risk, instead of being integrated with, to be reduced to part of another spatial domain and lose further attention. The pillarization that integration seeks to overcome might have served as a protection for policy domains not in the spotlight of attention (Pollitt, 2003). Consequently, the introduction of integration might now create a shift away in attention from the previously by pillarization protected domain and lead to a decrease in policy quality for that domain.

Last, the input of citizens through far more extensive participatory trajectories is intended to increase legitimacy and to raise the quality of the decisions made (Ministerie van Infrastructuur & Milieu, 2013). Spatial domains which are directly affecting citizens such as housing or transport most likely will receive input and attention from citizens. However, it is unclear whether all spatial domains will receive this attention and what the consequence is of a lack of interest during participatory sessions for the quality of certain spatial domains.

One of the spatial domains that is most readily affected by the possible drawbacks of the EPA is monuments' care . Monuments are part of cultural heritage, the material and immaterial sources from the past which are identified as an expression of the norms, values and traditions of a society. A monument is a property that is part of cultural heritage (Ros & Zomer, 2018 p. 9). Previously monuments' care was guided by the sectoral Monuments' Act of 1988. With the introduction of EPA the care for cultural heritage that is a property, the allocation of non-national monuments and the allocation of spatial cultural heritage is moved to EPA, while the other parts of cultural heritage, mostly immaterial are alloted to the new Heritage Act (RCE, n.d.a). Consequently, most of the monuments' care in the Netherlands is also subject to the new integrative, flexible framework EPA.

The quality provided by the EPA for monuments' care effectively determines the future of monuments' care in the Netherlands and is therefore highly relevant, with the three possible drawbacks casting a shadow of doubt on this future quality. First, the nature of a framework law means that monuments' care becomes more subject to the attention allotted to the domain by policymakers and, as it is possibly not as high on the agenda as issues such as sustainability, the attention might shift and quality decreases. Second, policy integration

might also create a shift away in attention, as monuments' care no longer is the object of its specific plan or regulation but is integrated with numerous other spatial domains, leaving it competing for attention with spatial domains potentially far higher on the agenda. Last, whether citizens are interested in monuments' care is unknown, while their input might partially determine the efforts of municipalities to effectively ensure a high quality of monuments' care.

#### 1.1 Research Aim and Question

What quality of monuments' care is reached and how the EPA has influenced the quality of the considerations is the core of this research. Consequently, the research is evaluative, focusing on determining the policy quality reached as a consequence of the EPA. As the EPA is only fully implemented in 2029, the evaluation is ex-ante, aiming to determine the quality of monuments' care which can be expected of the EPA. The research specifically focuses on the first instrument of the EPA, the environmental strategy, which has been implemented by many Dutch municipalities. The environmental strategy is a vision document that encompasses a description of the spatial quality in a territory and the future development of the spatial quality (VNG, n.d.a.). As it is a vision document no full-fledged policy is included but only policy considerations for future policies, and as a consequence, the focus of this thesis is on the quality of the policy considerations made for monuments' care.

To analyze the content of the environmental strategies two challenges arise. First, one needs to develop a measurement tool to determine the quality of considerations for monuments' care in strategic documents. Second, using the measurement tool one needs to determine the quality of monuments' care in the environmental strategies. Once the quality of the content of the environmental strategies is clear, one can turn to understanding whether the changes propagated by the EPA have played a part in bringing about the found quality. The focus here is explicitly on the processes of policy integration and public participation, as these are actively propagated by the government as *the* relevant changes (Ministerie van Infrastructuur & Milieu, 2012; Ministerie van Infrastructuur & Milieu, 2013; Ministerie van Binnenlandse Zaken en Koninkrijksrelaties, 2020).

Based on the analysis of the environmental strategies and the consequences of the changes instigated by the EPA, one can judge the quality of monuments' care provided in the environmental strategies of Dutch municipalities. Additionally, one can conclude whether the EPA is beneficial for a more vulnerable spatial domain, such as monuments' care. Ultimately, the goal of this thesis is to determine the quality of policy considerations that is delivered for monuments' care in the environmental strategies of Dutch municipalities, and whether policy integration or public participation, or both have played a part in this, in order to have a better understanding of the consequences of EPA for monuments' care. Consequently, the main question of the research is: *What is the quality of policy considerations for monuments' care in environmental strategies of Dutch municipalities and have policy integration or public participation to the quality found?* 

In order to answer the main question, the following sub-questions have to be answered first:

- What is the design of the Environment and Planning Act, and how does this alter the demands placed on municipalities for monuments' care?
- What are quality indicators for policies according to the literature, and how can these be applied to policy considerations?
- What are the consequences, both threats and opportunities, of policy integration based on existing literature?
- What are according to the literature the contributions of public participation to policy considerations?
- What quality of policy considerations for monuments' care is present in the environmental strategies of Dutch municipalities?
- Have policy integration and public participation contributed to the found quality of the environmental strategies of Dutch municipalities?

### **1.2 Scientific relevance**

The research contributes to the literature in four ways. To begin, the research explicitly uses existing theory on integration, not to determine the overall outcome of the integration process, but to determine the consequences for a previously separate policy issue, now integrated. In contrast to other research (Christensen & Lægreid, 2007; Candel & Biesbroek,

2016; Dubé, Addy, Blouin & Drager, 2014) which are more focused on the overall process of integration, this thesis focuses on the consequences for a specific subsection of the overall integrated policy. Consequently, this research can contribute to understanding the doubts raised in earlier research on the benefits of integration for all integrated parts of a policy (Pollitt, 2003; Juillet & Bakvis, 2004)

Moreover, this research contributes to the literature by offering a way of determining the quality of policy considerations. Within the literature understanding the quality of a policy is not new (Hemerijck, 2003; Hemerijck & Hazeu, 2004). Neither is measuring the quality of policy in policy documents (Berndsen, Fraanje, Korsten & Kort, 2007; Korsten, n.d.; ROB, 2008). However, the focus of this research is on strategic documents instead of full-fledged policies. This creates difficulties for using quality indicators for full-fledged policies on policy considerations made in a strategic document. Consequently, this thesis contributes to the literature by adapting existing theory on the quality of policies, so as to be able to determine the quality of considerations instead of full-fledged policies.

Additionally, this thesis contributes to the literature by explicitly combining insights from the field of integration with literature on information-processing. Within the field of integration it is acknowledged that policy integration is not solely beneficial (Pollitt, 2003; Tosun & Lang, 2017), for example focusing on the drawbacks of depillarization for certain policy fields (Juillet & Bakvis, 2004). However, the argumentation for this is more empirically based. By using insights from the literature on information-processing (Baumgartner & Jones, 2005; Workman, Jones & Jochim, 2009; Jochim & May, 2010), this research shows that information-processing can help to explain why integration is not necessarily always beneficial for previously pillarized policies.

Finally, this thesis contributes to the literature by its findings on the relation between integration and public participation. Although theoretically separate (e.g. Tosun & Lang, 2017; Candel & Biesbroeck, 2016; Ansell & Gash, 2008; Innes & Booher, 2004), empirically the two seem very much intertwined. The thesis proposes the idea that a relationship exists between integration and participation that, depending on the abstractness of the policy issue at hand, can be of large influence on the contributions of participation. When policies become integrated at a more abstract level, such as at the level of future considerations, participation does not tend to follow this level of abstraction, remaining at a more concrete level. At the same time, if one tries to take out the integration from participation, citizens tend to not keep to the boundaries of policy subsystems. Consequently, this thesis contributes by proposing a quadrant for analysing and determining useful participation in integrated settings of high abstraction.

#### **1.3 Societal Relevance**

In addition to scientific contributions, this research also makes three societal contributions. To start, the outcome of this research contributes to understanding the quality of the policy considerations made for monuments' care. An overview of the quality present in environmental strategies in municipalities in the Netherlands is offered. Using this overview one can signal that quality is sometimes failing. Consequently, the research helps to serve both as a signal to municipalities and as a guarantee to provide quality not only in practice but also in the environmental strategies for monuments' care, as these are the vital building blocks for future spatial policy.

Furthermore, this research contributes by creating a tool for evaluating the quality of the policy considerations made for monuments' care in environmental strategies. This tool can be useful for municipalities themselves to be used as a quality standard for evaluating their own considerations and discussions, and to serve as a checklist whether all aspects have been considered. Additionally, this tool is not only useful when focusing on the specific policies on monuments' care, but might also be useful in other adjacent policy fields integrated in the environmental strategies.

Last, the conclusions of this thesis on the relation between participation and integration in a situation of more abstract policy considerations can help municipalities to structure the forms of participation and the type of questions asked. Citizens tend to be on a level of concrete integration, which means their concerns are boundary spanning and very tangible. Policy considerations for strategies are very much integrated, but at the same time also future oriented and broad making them highly abstract. This creates a mismatch between participation questions from the municipalities and the input many participants are willing and able to offer. On the one hand, municipalities can choose to make participation less abstract by substantiating the abstract policy considerations for the future in more concrete

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questions or points of discussions. On the other hand, municipalities might opt for a more intensive process of participation in which participants are more intensively supported in their discussions, helping them towards a more abstract level of discussion.

#### 1.4 Reading Guide

This research is structured as follows. First, the policy framework of the Environment and Planning Act and the place of monuments' care in it is discussed. In this section I determine what relevant changes are introduced for monuments' care by EPA. Second, I offer a theoretical approach to determine the quality of policy considerations, and I discuss the insights of the literature on the two main changes introduced by EPA: policy integration and public participation. Third, the methods for collecting and analysing data are discussed. Fourth, the results of the data collection and analysis are presented, and the implications of the results are discussed. Finally, based on the discussion in the previous section the main question can be answered, the implications for theory and practice are examined, the limitations discussed and recommendations are offered for further research and practitioners.

## 2. Policy Framework

In this section I discuss the implications of the EPA, specifically focusing on the environmental strategy, for monuments' care in the Netherlands. First, the layout of the EPA is examined and the newly introduced environmental strategy is discussed. Second, the place of monuments' care in the environmental strategy is examined. Third, the assumptions on the quality of the policy considerations for monuments' care in environmental strategies are discussed and challenged. Last, an overview of the EPA, the environmental strategy, and the consequences for the quality of policy considerations for monuments' care is offered, paving the way for a theoretical approach to quality of these policy considerations and the influence of the changes introduced by EPA on the policy considerations in the next section.

#### 2.1 The Environment and Planning Act and the Environmental Strategy

The EPA is designed to overcome problems facing the existing spatial legislation, which is regarded as contradicting, inflexible and highly complex (Ministerie van Infrastructuur & Milieu, 2013). Although current legislation has created a situation of optimized certainty, very little room has been left for flexibility and dynamics not captured by existing legislation. Consequently, it has been difficult to tackle new spatial challenges such as sustainable development and demographic change that demand ever more cross-sectoral approaches to spatial planning (Ministerie van Infrastructuur & Milieu, 2013; 2014). This has led to questions about the general spatial quality which can be delivered, as different acts might contradict each other (Tweede Kamer der Staten Generaal, 2012 p.9). The EPA aims to increase the quality and speed of decisions in spatial procedures, and to integrate spatial plans and assessments, so as to avoid contradicting policies and to stimulate synergy and the creation of more efficient solutions (Tweede Kamer der Staten Generaal, 2012 p. 9-10; Rijksoverheid, n.d.).

In order to realize the aims of the EPA, six new spatial instruments are introduced: The environmental strategy, the environmental programme, the environmental plan, the project decision, the environmental permit and the general environmental rules (Aan de slag met de Omgevingswet, n.d.a). The environmental strategy is replacing and expanding the current structural vision, the environmental programmes are replacing and expanding current policy programmes, and the environmental plan is expanding the existing zoning plan. As this research focuses on the quality of policy consideration for monuments' care, one can only turn to the environmental strategies and not to the five other instruments, because the outlook of the instruments has not yet become crystalized by the national government and therefore remains open for change. The environmental strategies have already been finalized and put to extensive use, while for the environmental plan and programmes uncertainty still remains, with the only clarity being its strong connection to the environmental strategies (Ros & Zomer, 2018). Consequently, only the strategies are yet in a stage in which it is possible to evaluate the potential effect of the instrument and the threats and opportunities that the instrument offers. Therefore, this research from now on solely focuses on the environmental strategies, and for now leaves the other five instruments for what they are.

All territorial layers of government, except the Waterboards, are asked to develop an environmental strategy, the all-encompassing vision for the future of the physical environment in the territory of a government (Aan de slag met Omgevingswet, n.d.b). This means that the responsible government for its territory develops a plan for the direction of the spatial development of that territory based on the expectations for the future, without laying down the rules of this development. Therefore, the environmental strategy creates an idea of the interlinked development of all spatial themes in a territory, and gives an idea of how all different spatial qualities are developed and preserved (Navigator, n.d.). This strategy is legally self binding on the legislative body of a territory, and creates expectations for the more specific measures taken to enhance and preserve the spatial quality in a certain territory. The strategy is created in a participatory trajectory together with relevant societal actors and citizens (VNG, n.d.a.). Monuments' care is one of the many spatial domains which is part of the environmental strategy.

#### 2.2 Monuments' care in the Environmental Strategy

Monuments' care previously was guided by the Monuments Act of 1988. This act demanded the protection of monuments by the government in an approach mainly based on the heritage strategy, which was either part of the structural vision or a separate vision. First of all, this meant that municipalities were asked to develop a strategy for heritage, but were free to decide whether to do this as part of an all-encompassing structural vision or to include this in a separate vision (NILOS, n.d.). Many municipalities chose to develop a separate heritage

vision, as this matched the mandatory heritage ordinance. Second, in the heritage ordinance municipalities published all the rules in place for heritage conservation and development in their territory (SIKB, n.d.).

In 2016 the new Heritage Act came into force splitting heritage conservation between the Environment and Planning Act and the Heritage Act. All heritage with a spatial component, such as protected views, built environment and surroundings of monuments, became part of the Environment and Planning Act. This meant that new instruments of the Environment and Planning Act also would become applicable to a large chunk of monument's care in the Netherlands (RCE, n.d.a). Although legal protections for heritage already in place remain, such as monument status or the conservation obligation for National Monuments (Ros & Zomer, 2018), there are two potentially large changes for monuments' care contained in the environmental strategies.

First, participation is core in the development of the new environmental strategy. The environmental strategy is created together with citizens through public participation sessions (Ministerie van Binnenlandse Zaken en Koninkrijksrelaties, n.d.). How this participation is done is determined by the responsible government (VNG, n.d.a). However, this does guide the way governments approach their future strategies. Depending on the outcome of citizens' consultations, the focus might shift in directions regarded as relevant at the moment of implementing the new environmental strategy.

Second, the different sectoral visions are combined into the environmental strategy, creating an integral vision which takes into account the different demands and aspects that together form spatial quality in one vision. Previously, municipalities could choose to either have an integral structural vision, or to have multiple sectoral structural visions guiding the spatial ambitions of the municipality (VNG, n.d.b.). The fact that now one integral strategy becomes mandatory should stimulate 'a more sustainable development of the physical space'.

However, at the same time this demand leads to municipalities having to disband their often more specified heritage visions. The environmental strategy is focused more on broad long-term ambitions, and creates a general indication for the spatial development of a certain territory. In contrast to the previously existing structural vision, the environmental strategy does not focus on specific spatial domains but combines them continuously to avoid

contradictions and conflicting goals between sectoral visions (VNG, n.d.b). Therefore, even though previous structural visions could also cover all spatial domains, these were often a reflection of the separate spatial domains simply put together in one document. The new environmental strategy demands policy integration, which means the different domains are far more integrated.

### 2.3 Assumptions on the quality of environmental strategies

Just as with the structural visions, municipalities are free to decide how their environmental strategy looks and what it includes. This means that for some municipalities it might be far more extensive than for others, and that some themes will receive more attention than others, depending on the municipality. Whether monuments' care will be receiving sufficient attention in the environmental strategy to ensure a high quality of considerations is for some not in doubt, with Ros & Zomer (2018 p. 13) writing: 'It is unthinkable that heritage is not part of the environmental strategy of a municipality'. They offer two reasons for this.

First, the strong connection between the environmental strategy and the environmental plan, and the fact that heritage is a mandatory part of the environmental plan, means that not giving attention to heritage in the strategy creates no basis for decisions on future development, use, protection and conservation of heritage in a municipality. Second, the spatial qualities of the territory of a municipality should also be described in the strategy, including the future development and preservation of these qualities. As heritage is inherently part of the spatial qualities of a territory, monuments' care is expected to have a place in the environmental strategies (Ros & Zomer, 2018).

Whether these two assumptions are correct and monuments' care will be part of the environmental strategies of municipalities is central to this research. Although the arguments made are compelling, they are made by researchers for heritage support (Ros & Zomer, 2018). Their view on the interpretation, but especially the implementation of the EPA for monuments' care might be somewhat idealistic. Whether municipalities interpret the demands put on them by the EPA in a similar fashion is highly doubtful, as they are not solely focused on heritage but also have to include numerous other spatial domains in the environmental strategy (Aan de slag met de Omgevingswet, n.d.a.). Moreover, the assumption that municipalities have the capacity to describe the spatial quality specifically

for monuments *and* create plans for its future development hinges upon the presence of experts on heritage. This seems an unlikely demand with many municipalities not having the capacity to employ a full-time heritage expert, nor will they be likely to specifically attract one for the creation of the environmental strategy. Consequently, one should be careful to simply accept the assumptions on the presence of monuments' care in environmental strategies. To determine whether the assumptions on the quality of environmental strategies for monuments' care do hold in actual environmental strategies, this research uses an ex-ante evaluation of the instrument environmental strategy and its application by municipalities for monuments' care. By evaluating the environmental strategies for monuments' care this research determines whether the assumptions of Ros & Zomer (2018) for the quality of protection of monuments' care in environmental strategies are realistic.

#### 2.4 Overview

In short, the EPA aims to both increase the quality and speed of decisions in spatial procedures. Additionally, the EPA integrates spatial plans and assessments, so as to avoid contradicting policies and to stimulate synergy and the creation of more efficient solutions. In order to reach the aims of the EPA, six new spatial instruments are introduced. However, the only instrument of the six that has already taken its final shape and is already being used, is the environmental strategy. Consequently, this research from here onwards only focuses on the implications of environmental strategies. The environmental strategy is a long-term vision-document, which includes a description of the spatial quality now and the desired spatial quality in the future.

For monuments' care in the Netherlands the introduction of the environmental strategy has two main consequences. First, active public participation is mandatory under the Environment and Planning Act for environmental strategies. The outcome of the participatory trajectories might be of large influence on the place of monuments' care in the new Act. Second, the integrative nature of the law means that monuments' care is part of a larger integrated discussion between different spatial domains. Therefore it is no longer the specific focus of a sectoral vision, but it is integrated together with all other spatial themes.

Some expect an abundant presence of monuments' care in the environmental strategies of municipalities, as environmental strategies lay the groundwork for the environmental plan and describe the spatial quality of a municipality. However, this is

doubtful as it assumes municipalities to share the same insights on EPA for monuments' care as heritage researchers, and assumes that municipalities have the expertise to do so. Consequently, it is questionable whether municipalities can in fact provide a high quality of considerations for monuments' care, which is central to this research. In the next section the theoretical views on how to approach determining quality are discussed and the theoretical consequences of the two main changes of the EPA, integration and participation, are examined.

### **3. Theoretical Section**

In the previous section I discussed the major changes for spatial policy in the Netherlands as a consequence of the introduction of the new Environment and Planning Act. In this section I shift to a theoretical approach on the consequences of the introduction of this act. First, as I am specifically studying environmental strategies, I am focused on a specific phase of policymaking, namely policy considerations, which should be theoretically clearly demarcated from other stages of policymaking.

Second, once the concept of policy considerations is clearly demarcated, one can turn to understanding the quality of the environmental strategies, the policy considerations in the Environment and Planning Act. To do so I turn to theory on the quality of policy in general and adapt it, so it can be used as a framework for judging the quality of policy considerations made. Third, I turn to the effects of the first major change introduced by the Environment and Planning Act as discussed in the previous section: policy integration. Both the possible positive and negative consequences of policy integration for the quality of policy considerations are discussed. Fourth, I turn to the effects of public participation, the second major change introduced by the Environment and Planning act, on the quality of policy considerations. Last, an overview is offered in which a model is presented to determine the quality of policy considerations made and the effects of policy integration and public participation on it.

## 3.1 Policy considerations

The effects of the Environment and Planning Act are only visible within the present environmental strategies, vision documents without concrete policy proposals. These vision documents are vastly different from fully fledged policies and only reflect the policy considerations made by policymakers for future policies. To understand the quality of a policy one needs to evaluate it and the evaluation depends on what sort of policy document one is studying. Consequently, a clear demarcation is needed between policy considerations, policy output, policy outcomes and policy argumentation so as to fully understand what sort of evaluation can be done.

To begin, policy considerations are the deliberations made by policymakers for a strategy or vision, which describe the current state of a policy field, identify problems and

preferred end-states. Therefore, the considerations serve as the groundwork for the actual detailed policy plan, which includes instruments and can be examined for its functioning. In contrast to a plan, a consideration cannot be tested in terms of functioning, as it lacks concrete instruments, but merely is a reflection of the intentions and discussions of policymakers. Depending on the policy in place, the considerations are either part of a discussion or might be reflected in strategies or visions that serve as the blueprint for actual policies.

Consequently, policy considerations can be demarcated from policy outputs, policy outcomes and policy argumentation. First, policy outputs are the direct effects of the policy instruments of a policy in place. Instruments are the tools used by a public agency to either maintain or alter the status quo. For determining the quality of the output, one can turn to the legal effects of the instruments in place and determine the exact consequences of the instruments. Second, policy outcomes are the effects the policy instruments have in bringing about the desired outcome. Policy outcomes are often difficult to determine as one needs to isolate the effect of the policy from other effects that might influence the desired state (e.g. Howlett, Ramesh & Perl, 2009; Hoogerwerf & Herweijer, 2014; Bondarouk & Mastenbroek, 2018). Last, policy argumentation focuses on the role of language and the use of reasoning and interpretations during the process of both policymaking and evaluation. Policy argumentation is not a specific phase of policymaking but rather critically examines the value-laden reasoning that informs policymaking and analysis (Gottweis, 2006 p. 461-464)

The demarcation is difficult by means of a definition, but is more readily understood by showing what part of the policy process is the focus of the four different concepts when studying quality. For policy outcomes one turns to examining the overall change in the desired outcome and the isolated effect the policy had in this outcome, for policy outputs one examines the quality of the instruments by determining the direct measurable changes foreseen by the instruments and for policy argumentation one focuses not on a subset of the process but on the reasoning and arguments provided for the whole process of policymaking. Policy output, policy outcome and policy argumentation are therefore different from considerations, as policy considerations are focused only on the first phase of policymaking process and are not focused on the critical examination of the different values imbued in the arguments, but on the reasoning for strategy or vision documents.

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Although this seems as a discussion about semantics, the importance lies in the type of evaluations possible for certain policies. First, if one aims to evaluate the full impact of a policy, one needs to turn to the policy outcomes, which means the policy has at least been in place for a certain amount of time sufficient for the effects to become visible. Second, if one aims to evaluate the policy output, one can use a shorter timeframe and focus on the direct consequences visible after the implementation of a policy. Third, if one aims to evaluate the use of language and the differences in interpretations of the arguments in policies, one turns to policy argumentation. Last, if one aims to evaluate policy considerations, one has sufficient material if one analyses the visions or strategy documents that underpin the policy at hand, focusing on the deliberations made here and not on the direct consequences or the differences in and the impact of the use of language of these considerations. Consequently, choosing to focus on policy considerations means being able to ex-ante determine whether the deliberations were of a quality, serving as a predictor for the policy stooled on the policy considerations made.

#### 3.2 Quality of Policy considerations

Now that it is clear that a focus on policy considerations is useful in times when policies have not been fully implemented nor developed beyond a strategy or a vision, one can turn to the question of how to judge the quality of these considerations. To judge the quality of the policy considerations made with the creation of a new policy, one might use the four 'core questions' of any policy, as formulated by Hemerijck (2003). The four core questions are a reflection of both the type of legitimacy strived after by policymakers and the action orientation used by policy makers.

On the one hand, the legitimacy of a policy can be judged either on the output-legitimacy or the input-legitimacy. The input-legitimacy is based on the agreed upon norms and values of how decisions should be reached by a government. Therefore it is important that the decision-making should be regarded as rightful by those for whom the decision is made. The output-legitimacy is a form of legitimacy dependent on the quality of the solution to a perceived problem. This form of legitimacy is more readily tested as one can simply question whether the goals formulated by policymakers are reached by the policy put

in place. Both forms of legitimacy are necessary for a policy in a functioning democracy and one cannot replace one with the other (Hemerijck, 2003; Hemerijck & Hazeu, 2004).

On the other hand, the logic of the actions taken can be judged based on the action orientation of policymakers. Allison (1969) already differentiated between a logic of consequence and a logic of appropriateness, underlining the relevant difference for policymaking between focusing solely on the problem and anticipating future problems versus placing a problem within the institutional context and the response of this context to the problem. The logic of consequence is focused on the utility and the desirability of a solution in reaching a certain goal. Government is regarded as a unitary actor with clear and stable preferences and rational decision-making in selecting a policy instrument. In contrast to the logic of consequence, the logic of appropriateness is not focused on the utility of a given solution but on the political and cultural acceptability of a given solution. The choices for a certain policy are therefore not the sole consequence of a rational cost-benefit analysis but more likely based on the standard operating procedures in place in a certain institutional context (Allison & Zelikow, 1999).

The combination of legitimacy and action orientation create a framework of four core questions which can be used to judge the extensiveness and quality of the policy considerations of policymakers, visualized in table 3.1 (Hemerijck, 2003). If one uses the logic of consequence with the forms of legitimacy, one is examining the acceptability and reachability of a policy decision. If one combines the logic of appropriateness with the forms of legitimacy, one studies the legality and efficiency of a policy solution. All these four questions should be considered for complete policy considerations, as all focus on different relevant aspects policies should possess. The relation between these four and the change in it can show what policy changes can do to the considerations of policymakers in designing and redesigning policies and are therefore highly useful in understanding how a change in a policy subsystem affects the considerations of policymakers, by showing how the relative considerations to these four questions changes (Hemercijk, 2003; Hemerijck & Hazeu, 2004). In the following part of this section the four core questions which should be considered in policy making are examined in more depth.

#### Table 3.1 The four core questions of policies

	Input-legitimacy	Output-legitimacy
Logic of appropriateness	Acceptability	Reachability
Logic of consequence	Legality	Effectiveness

Source: Hemerijck 2003 (Own translation)

First, the acceptability of a policy is focused on the extent to which a desired policy is in line with the existing norms and values in any society. The acceptability is therefore a highly normative and context dependent criterion for any policy, as it contingent upon the different views and opinions present at a specific time and space. Judgement is passed based upon the perception of citizens of the functioning and the legitimacy of any government decision and should reflect the desires, norms and values of different citizens. Consequently, policy decisions are acceptable if they conform to the expectations of society about the functioning of a policy and of the government itself (Korsten, n.d.; Hemerijck & Hazeu. 2004).

Second, the reachability of a policy examines whether policies are feasible. The feasibility of a policy is based on both the possibility of an administrative unit to in fact carry out the policy, and on the possibility for a policial body to pass the measures necessary for a policy to be put in place. The feasibility of a policy for political actors means that the decision should be acceptable to the actors responsible for taking a measure. This does not mean normatively acceptable, but strategically acceptable in the sense that sufficient support should be present in terms of votes and influence to ensure the implementation of a policy. The feasibility of a policy solution. The new policy should not contradict existing policies and the proposed policy solution. The new policy should not contradict existing policy traditions, depart from the policy inheritances of units or demand changes in a path dependent policy situation. Both the policical and administrative feasibility are therefore focused on the question whether a new policy fits the existing configuration (Hemerijck, 2003).

Third, the legality of a policy decision focuses on whether a proposed policy solution is viable within the existing constitutional framework. Any policy solution proposed should not contradict existing laws or conventions, as it would be considered illegal and the legitimacy of the decision for implementing a policy would vastly decline. Simply put, any government decision must be supported by the existing legal framework of a state, because all the power of a state should be subordinate to the laws in force in a certain territory. If a state would not follow the laws it sets for itself it risks undermining the legitimacy of its functioning and the legality of any policy proposal should therefore be considered (Hemerijck, 2003). Additionally, the law might offer a minimum set of considerations and protection for any policy area by demanding certain procedural actions, such as a legal demand for the inclusion of a policy area in a strategy, programme or plan (Hemerijck & Hazeu, 2004). Consequently, the aspect of legality often includes a focus on the minimum demands created by the law for the consideration of a certain policy area. For example, as was seen in the previous section, the EPA includes a demand for a description of the spatial quality in the environmental strategy, which should lead to considerations for monuments' care, as monuments are part of the spatial quality of a territory.

Last, the effectiveness of a decision focuses on the question whether a policy solution is actually helpful in solving the problem it is supposed to tackle. Here the focus is on the causal relation between the solution and the problem it is supposed to tackle and whether this solution can tackle the problem in a consistent, effective and efficient manner. The solution is compared to other possible solutions based on the consistency, effectiveness and efficiency and costs and benefits of each solution are taken into account. The solution that in fact produces the most efficient outcome is the preferred solution according to this judgement of quality of any policy solution (Hemerijck, 2003).

Studies focused on full-fledged policies tend to have a strong focus on effectiveness (ROB, 2008; Berndsen et al, 2007). However, it is questionable whether effectiveness is applicable with regards to policy considerations, as considerations in strategy documents do not tend to offer solutions but only descriptions of the current situation. Strategies do include descriptions of a certain policy field and of the problems faced, but not of the preferred policy instruments to tackle the problems, thereby making the usefulness of effectiveness as an indication of the quality of the considerations questionable. Rather, I would argue a strategy is effective when it is clear which policy problems should be dealt with in a subsequent plan, not by which instruments, which is part of the subsequent phase of policy development.

Therefore, considerations of effectiveness are not necessarily included in policy considerations, but effectiveness is reflected through the presence of the other three considerations. When the other three considerations are sufficiently present, the considerations should make clear what a problem is and what the preferred development of a certain policy field entails. This would mean a combination of policy considerations offering clarity with regards to the preferred developments in a policy field, making the strategy an effective basis for the subsequent phases of policy development, as the strategy is actually helpful for the subsequent process. By being useful in the subsequent process the strategy is effective, because if one questions 'does it work?' about the considerations, one can answer yes if the policy considerations together create a clear foundation for subsequent stages of policy development.

All in all, Hemerijck (2003) offers four core questions which should be taken into account when designing policies. Three questions regarding the acceptability, reachability and legality are useful questions when examining and determining the quality of policy considerations. Policy considerations should to some extent take every one of three questions based on acceptability, reachability and legality into account. An absence of a consideration of one of the questions does show that policymakers have not fully considered the implications of the policies and strategies they are proposing. I argued that the fourth dimension, effectiveness, cannot be expected to be explicitly part of policy considerations, as effectiveness focuses on questions of whether solutions to policy problems work, while solutions are not part of policy considerations. Rather, policy considerations are effective when they as a whole offer a clear guide for the subsequent phases of the policy process, answering all questions regarding desired developments and present problems, which are part of the policy considerations. If a strategy offers a guide to the desired developments and present problems, the strategy itself is effective as it includes all necessary components to be useful in the subsequent phases. Consequently, policy considerations have a good quality if the three considerations of acceptability, legality and reachability are taken into account, with effectiveness being a reflection of the presence of the other three considerations.

#### **3.3 Policy Integration**

Until now I have determined that environmental strategies are focused on the stage of policy considerations, which is different from policy outcomes, argumentation and output. To judge the quality of the policy considerations I have offered a framework focusing on the acceptability, legality and reachability of the policy considerations. Now that one has a framework to judge the quality of the policy considerations, I turn to possible factors that could influence the quality of the considerations. The two major changes introduced by the Environment and Planning Act in environmental strategies were the introduction of policy integration and public participation. Therefore, my focus lies on the impact of these two alterations on the quality of the policy considerations made. In this part of this section I focus on policy integration, and in the next part of this section I focus on the effects of public participation.

The first major alterations for the protection of monuments' care in the Netherlands in the Environment and Planning Act is the introduction of policy integration, which can be expected to influence the previously discussed quality of the policy considerations. Traditional policymaking is focused on tackling a single problem by introducing a set of specific policy measures to tackle this problem (Tosun & Lang, 2017). However, this way of dealing with problems has certain limits, as certain policy issues go beyond the confines of its own policy area and are also influenced by the approaches taken in adjacent policy areas (Jochim & May, 2010). Consequently, policy issues which are boundary spanning are in need of policy solutions integrating approaches from different policy areas (Pollitt, 2003, Tosun & Lang, 2017).

Policy integration in its most basic form comes down to working across policy domain borders to achieve a certain goal, which spans the boundaries of the policy domains (Christensen & Lægreid, 2007 pg. 1060). Different policy domains are made subject to a single goal or concept, which should lead the different policy domains to working together towards a single goal (Candel & Biesbroek, 2016). Therefore, policy-makers of different policy domains are focusing their attention across the boundaries of their own domain to a shared vision of a policy issue (May, Jochim & Sapotichne, 2011). This all in the end comes down to horizontal and vertical coordination of thinking, issue definition and issue remedies between policy domains to address boundary spanning problems. Policy integration can potentially positively affect the policy considerations made by policymakers in multiple ways. First, policy integration is focused on avoiding policies contradicting each other, consequently undermining the utility of individual policies (Pollitt, 2003; Tosun & lang, 2017). If policy subsystems do not take into account the policies and policy goals of other policy subsystems, the policies they devise might end up countering the effects of policies other policy subsystems. If policies are not properly integrated beyond subsystems, the policy considerations of different subunits might be counterproductive. One can then have a full set of considerations per subunit, but these considerations are not applicable to other subunits and might even be conflictual undermining the strategies of other subunits. Policy integration might serve as a solution to overcome this problem and make sure that different tiers of government or different subunits of governments take into account what is in fact possible in their current institutional context (Bakvis & Juillet, 2004).

However, at the same time one has to be careful with policy integration as *the* answer to contradicting policies. Although one might sometimes use it as a way to overcome contradictions, contradictions are sometimes inherent between policies because different priorities are set between policymakers. One can illustrate this using the three policy considerations discussed earlier: legality, acceptability and reachability. For instance, one policy unit for monuments' care is focused on the reachability of a monuments' care programme in an old city, which makes monuments contribute to the production of renewable energy sources. Another unit is focused on the acceptability of the preservation of the traditional view of monuments'. Their difference in approach is not to be overcome by policy integration, as their policies do not contradict each other because of differences in instruments used but because of a difference in allotting importance to different considerations.

Second, policy integration might stimulate the production of synergy, as the cooperation between different actors from different policy background might stimulate the creation of innovative ideas and enhance smarter working between policy subsystems (Pollitt, 2003; Candel & Biesbroek, 2016)<sup>1</sup>. For policy considerations this point is highly valuable as

<sup>&</sup>lt;sup>1</sup> The use of policy integration in policy making would lead to a more effective use of the scarce resources governments have. By integrating policy subsystems the duplication of policy instruments might be avoided and the sharing of information, equipment and buildings can lead to an effective use of goods and services available.

it implies that policy integration can serve as a way of stimulating different views and considerations of policies to be taken into account and to support one another. By stimulating synergy policymakers from the different 'pillars' engage in shaping a policy, creating possibilities for a *change in perspective*. One unit might focus on legality as their most important consideration, while another unit is more focused on the reachability and the acceptability. Policy integration can help to create synergy by stimulating cooperation between these two groups and taking into account all the considerations, instead of only those which were previously used by the pillars. However, once again one has to be careful to say policy integration is a certain answer to overcome conflictual considerations. Some conflicts in considerations cannot be simply overcome by working together as they are more deeply rooted, for instance in the belief system of actors (Cairney, 2020). The positive effect of policy integration on the policy considerations is visualised in figure 3.1

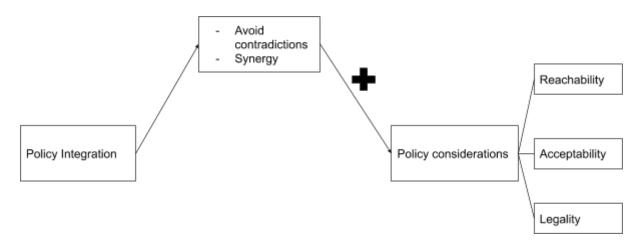


Figure 3.1 Positive influence of policy integration on policy considerations.

### 3.4 Drawbacks of policy integration

Although policy integration is a departure from, and solution to, some of the practices of mainly New Public Management, this does not mean that the practices of New Public Management are obsolete or dysfunctional. In many instances demarcated organizational functions and tasks offer a clear way of shaping an organization and the work it is supposed to do (Christensen & Lægreid, 2007). Organizational boundaries create a clear division of labour and offer room for specialization, which is necessary for most modern organizations to properly function. As Pollitt (2003) argues by abandoning the silo structures 'one must be careful not to throw the baby out with the bath water (p. 39)', as the silos also organize and

shape the work people do. With fading boundaries come competing information flows, creating the question whether the boundaries sometimes serve to protect more vulnerable policies from being drowned out by information from policies seen as more salient. I explore this point of information competition as a downturn of policy integration in more detail in this part of the section.

Issue attention of both policymakers and organizations can be regarded as a scarce resource. Information is often abundant and oversupplied to organizations and decision-makers, meaning that they have to prioritize, neglect and select certain pieces of information to make sense of policy issues (Baumgartner & Jones, 2005; May, Workman & Jones, 2008). However, the relevance of this observation seems to be underestimated often when discussing changes in policy-making and policy environments. Already in 1983 March & Olsen wrote that attention was a scarce resource, but one which is hardly recognised as a constraint or complication to the process of policy-making. They argued that reality of many policy processes is not shaped by laws, structures, power or culture but might be shaped by the organization's attention to issues within an organization (March & Olsen, 1983). Therefore, the organization of attention is central to understanding what issues even make it to the agenda and can enter the considerations of policy-makers.

To be able to understand when and which issues receive attention and thus how attention is organized, one has to understand how information is processed. Information processing can be defined as the 'collecting, assembling, interpreting and prioritizing of signals from the environment (Workman, Jochim & Jones, 2009, p. 78)'. The sheer amount of information which confronts individual policymakers means that they have to make choices, as it is impossible to process all the information coming their way. People necessarily focus on only a subset of all the issues that confront them, often ignoring many issues and focusing only on some. Although some individuals are certainly more effective and efficient in organizing their attention to problems and more capable of combining and switching between issues, in the end there is always a limit to this for individuals (Baumgartner & Jones, 2005 p. 34). On the one hand, this limit is caused by the problem of an overflow of information which simply cannot be processed (Workman, Jochim & Jones, 2009). On the other hand, it is created by the fact that humans have a severely limited attention capacity, meaning they can only focus on one issue or problem at the time (Baumgartner & Jones, 2005 p. 231). This inability to process multiple flows of information or focus attention on multiple issues at the same time is caused by the fact that humans process information serially (Zahariadis, 2007). This problem of serial processing means that attention allocation to one issue necessarily means that another issue will not receive this attention at that time.

After an individual has decided which piece of information to devote attention to (Baumgartner & Jones, 2005 p. 33), two essential choices are made about the information (Baumgartner & Jones, 2005 p. 206). First, an individual has to decide how much of its attention can be devoted to the problem (Workman, Jochim & Jones, 2009). The fact that a problem is picked up by an individual does not necessarily mean a large increase in attention, but might also be a very limited time devotion to the problem. Second, an individual has to decide which aspects of the issue at hand are relevant. The choice to use a certain problem definition and to focus on certain attributes determines largely how a problem is perceived and what solutions are viable to tackle the problem at hand.

However, this is not the whole story. The fact that information is first recognised as being relevant, then decided that a certain amount of time will be spent on the problem and finally that certain attributes of the problem are relevant is relative to the information flows available (Baumgartner & Jones, 2005 p. 52-53). Attention given to certain issues means other issues cannot receive that same attention. By consuming the scarce attention of policymakers and organizations, some issues crowd out others because they are prioritized above others. When and if an issue receives attention is therefore relative, because it depends on the presence and magnitude of the signs given off by other issues. The signals of a certain issue at one point in time might be sufficient to lead to action, while the same intensity of signals at another point in time might not lead to action simply because the agenda is more crowded and the signal intensity here is not sufficient to grasp the attention of policy-makers or the organization. The threshold when attention is given to an issue is therefore context-dependent and relative to the signals and presence of other issues vying for the attention of policymakers<sup>2</sup>.

<sup>&</sup>lt;sup>2</sup> The threshold is also subject to strategic behaviour of other actors pushing for the recognition of 'their' problems. However, in the case of this argument that is not relevant. Simply put, the more

Proponents to policy integration might argue that the amount of attention devoted to the total amount of issues is stable when one moves from pillarization to policy integration and therefore is of no influence on what issues reach the attention of policymakers. However, this is to ignore the relativity of attention (Baumgartner & Jones, 2005 p. 53). Issues which might not have been of interest to policymakers when competing with other issues in a pillarized situation, might reach the threshold of attention when these issues suddenly compete with far more issues but also for far more attention. Other issues which might have been able to reach the threshold when competing in a pillarized situation with other issues, might in a policy integration situation no longer reach this threshold, as other issues, previously not relevant for competition, manage to grab the attention. Consequently, policy integration can change what issues manage to reach the attention of policymakers, offering opportunities for some and threats for others.

This argument can be illustrated by figure 3.2. In the figure in situation 1 there is no policy integration and the policies A, B, C and D are all pillarized. Imagine that a policymaker has time for one issue per policy. The largest shape in each policy, which is circled, is the one with most information intensity and will receive attention. Now switch to policy integration in situation 2. The policymaker still has time for a total of four issues. The four largest shapes still have most intensity, are circled, and will receive the attention of the policymakers. However, as one can see this is a situation in which no issues for the original policies B and D are receiving any attention, while the issues of policy A are receiving far more attention than in situation 1.

issues the more policy entrepreneurs and strategic behaviour. There is no reason to assume this behaviour does not increase linearly with the number of issues at hand.

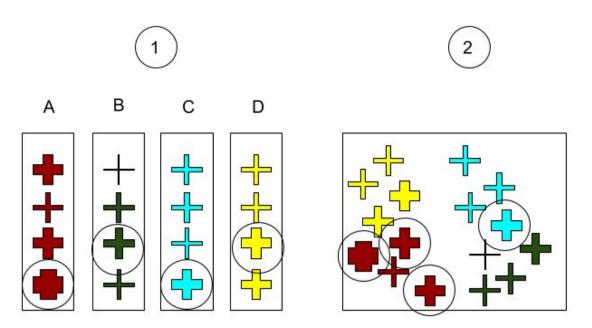


Figure 3.2 Issue attention in pillarlization and policy integration.

In short, policy integration can also have a downturn for information processing and consequently for policy areas integrated in the overarching policy. Although policy integration might stimulate synergy and overcome contradictions between policies, policy integration can also lead to a change in the relativity of information processed and the total amount of information processed. As a consequence, policymakers might disregard policies which did receive attention when still pillarized but fail to grab their attention in an integrated setting. This can lead to a downturn in the quality of the policy considerations as policymakers spend less attention to certain issues that have faded away from attention. This can be illustrated in figure 3.3, building upon the earlier figure 3.1.

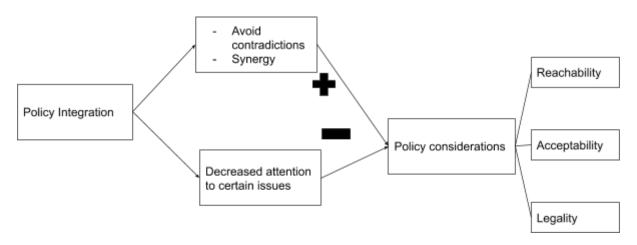


Figure 3.3 Effects of policy integration on the quality of policy considerations.

#### 3.5 Public participation

The first part of this section has been dedicated to determining what quality of policy considerations is and how policy integration, a major change in the Environment and Planning Act, can influence the quality of policy considerations. As discussed in the previous section, the second major possible change in the way monuments' care is shaped by the Environment and Planning Act, is the necessity for input from non-state actors, or public participation, which is the focus of the last part of this section.

To begin, participation in public decisions has been studied by numerous fields and different but related formats have been given numerous names such as collaborative planning, participatory governance, public participation and collaborative governance (Healey, 2011; Fung & Wright, 2001; Innes & Booher, 2004; Ansell & Gash, 2007; Papadopoulos, 2012). In this research the term public participation is used, which can be defined as a 'governing arrangement where one or more public agencies directly engage non-state stakeholders in a collective decision-making process that is formal, consensus-oriented, and deliberative and that aims to make or implement public policy or manage public programs or assets (Ansell & Gash, 2007, pg. 544)<sup>3</sup>.

Public participation is potentially beneficial for the quality of policy considerations in five ways. To begin, public participation simply helps to determine the preferences of non-state actors so that these can be included in the policy (Innes & Booher, 2004). In addition, involving the public and the knowledge they possess of the local situation might be helpful for the quality of the policy. Quality of any place is in the end a reflection of what the people of that place believe to be valuable and relevant (Healey, 2011). Therefore, the inclusion of citizens is beneficial for the quality of the policy, as only they can express what they believe to be valuable and relevant. Furthermore, participation offers a voice to those who might otherwise have been forgotten by public organizations (Innes & Booher, 2004). Moreover, involving all relevant stakeholders increases the input legitimacy of public policy decisions as all who are affected might have an opportunity to speak up (Papadopolous, 2012; Cohen & Sabel, 1997). Finally, the quality of any policy might be enhanced simply because

<sup>&</sup>lt;sup>3</sup> This is in fact the definition of collaborative governance. However, I use public participation as the term is more clearly applied in a setting of spatial development

the law requires a form of participation and failure to do so might undermine the whole policy (Innes & Booher, 2004).

Returning to the quality of the considerations of a policy at the start of this section, it is not difficult to see how public participation has the possibility to contribute to the quality of considerations made. First, for reachability the fact that all relevant stakeholders can participate helps to ensure that a solution is viable for those taking part in the implementation. Second, for acceptability the inclusion of all different groups enhances the chance that a solution is supported based on the norms and values of those involved. Last, the fact that it is done to stay in line with legal requirements simply helps to ensure the legality of the policy in the first place. All in all, one might expect public participation to enhance the quality of the policy considerations made. This is visualized in figure 3.4, building upon figure 3.3.

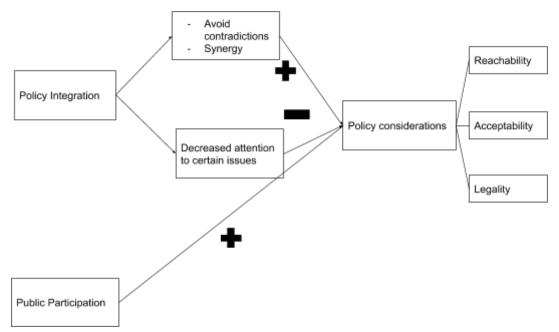


Figure 3.4 Overview of expected influences of alterations in monuments' care in the Environment and Planning Act.

### 3.6 Overview

In short, environmental strategies contain policy considerations, which can be defined as the deliberations made by policymakers for a strategy or vision that serve as the basis for the elaboration into concrete policy instruments. Policy considerations should be carefully demarcated from policy outputs, the direct effects of policies, and the policies outcomes, the broader effects of policies in bringing about an outcome.

To determine the quality of the policy considerations made in environmental strategies one can use the four core questions of policies focusing on the acceptability, legality, reachability and effectiveness of policies. First, the acceptability of a policy is focused on the extent to which a desired policy solution can connect to the existing norms and values in any society. Second, the reachability of a policy examines whether policies are feasible. Third, the legality of a policy decision focuses on whether a proposed policy solution is viable within the existing constitutional framework. Last, I argued that effectiveness was not applicable when focusing on considerations, as effectiveness questions whether proposed solutions work and considerations are only focused on examining the current state and the desired state of a certain policy field. A strategy containing policy considerations therefore does not answer questions of effectiveness, but can be judged to be effective as a whole, when the strategy itself 'works' by offering sufficient and clear considerations regarding the present and desired state for input future plans and programmes. Consequently, the quality of the policy considerations made can be judged using the considerations of legality, acceptability and reachability.

Once it was clear how one can define policy considerations, the content of environmental strategies, and how one can determine the quality of the considerations, I turned to the theoretical background of the two main changes brought about in environmental strategies for monuments' care: policy integration and public participation. First, policy integration was defined as working across policy domain borders to achieve a certain shared goal, which spans the boundaries of the policy domains (Christensen & Lægreid, 2007 pg. 1060). Policy integration was theorized to be beneficial as it would lead to synergy between departments and it would avoid contradictions between different policy units. However, at the same time it was theorized to have the possible adverse effect of reducing attention to policy issues not high on the policy agenda. Therefore, policy integration might be either beneficial or disadvantageous to policy considerations made for certain policy areas.

Second, public participation was defined as a 'governing arrangement where one or more public agencies directly engage non-state stakeholders in a collective decision-making process that is formal, consensus-oriented, and deliberative and that aims to make or implement public policy or manage public programs or assets' (Ansell & Gash, 2007, pg. 544). Public participation was theorized to contribute to the quality of policy considerations, because it helps to determine the preference of non-state actors, makes use of their specific local knowledge, offers a platform for marginalized groups and enhances the legitimacy of the policy considerations which are laid down in the environmental strategy of a government.

Two final notes before I turn to the next section of this research, which discusses the methods used. First, I want to shed some light on a possible relation between the two major alterations made in the environmental strategies: integration and participation. Although I have treated the two here as separate processes, one can not escape the reality that the two processes are almost certainly interlinked. On the one hand, the fact that participation occurs for an integrated strategy document means that participation is no longer centred around a strictly demarcated domain but shifts to a broader perspective. On the other hand, the fact that there is policy integration for a document requiring active public participation means that how one organizes this participation is different and that the questions which are confronted in such a trajectory are different. I do not want to pretend to understand the consequences of this, but my point here is that one should take into account the possibility that the contributions of either integration or participation to the quality of policy considerations made, might be partially influenced by the relation between the two.

Second, the model presented in figure 3.4, which gives an overview of the expected influence on policy considerations of policy integration and public participation, assumes no reciprocal relations between policy integration and public participation, or for instance between information-relativity and synergy. Although any model in the end is a simplification of reality, I still feel the need to draw attention to the fact that the theoretical concepts here presented will most likely in reality be interrelated, instead of parallel processes influencing policy considerations without reciprocal relations. Let me shortly illustrate this. Conceptually synergy, a positive consequence, and decreased attention, a negative consequence, are separated issues, but empirically chances are that if one has decreased attention for an issue synergy will not appear. The other way around if synergy is found for the issue one can almost safely assume that attention was still given to it. The same can be said for public participation. If public participation in the basis already contributes by putting an issue on the agenda, it is more likely that the issue will also reach the threshold of attention and be part of a synergetic process. The other way around, if the issue has reached

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the threshold of attention already, chances are that the issue is a theme for public participation and consequently will receive valuable input from the public. Consequently, the concepts presented here empirically are most likely not separate but intertwined and interrelated and a more complex relation between them exists which needs to be taken into account when interpreting the results of the research. However, before I can talk about results, I first turn to the methods of gathering and analyzing the data.

## 4. Methods

In this section the methods most suitable to collect and analyze data for answering the main question of this research are determined. First, the research strategy, in which a suitable methodological strategy is selected, is discussed. Second, once the strategy is clear, I turn to the method of collecting the data for the results and offer an operationalization of the concepts presented in the previous section. Last, the analysis of the data is discussed and an overview is offered.

## 4.1 Research Strategy

The main question of this thesis is: *What is the quality of policy considerations for monuments' care in environmental strategies of Dutch municipalities and have policy integration or public participation contributed to the quality found?* This question depends on determining both the quality of the policy considerations made by municipalities and determining if policy integration and public participation have contributed to the policy considerations. Therefore, to be able to answer the main question one needs a combination of methods, determining first the quality of the policy considerations and second, the role of policy integration and public participation in bringing about the found quality.

To begin, to reach the goal of determining the quality of policy considerations in the environmental strategies of Dutch municipalities, as discussed in the previous section, one needs to establish the presence of the three considerations of acceptability, legality, and reachability. The presence of considerations entails both the documented presence as well as the intended presence, and therefore requires an understanding of both the documents as well as the intentions behind the considerations found in the documents. Consequently, two different data strategies should be used. First, to establish the presence of considerations in documents desk research is the most suitable strategy. Desk research offers opportunities to interpret existing sources and the views expressed in it (Van Thiel, 2015; Vennix, 2011).

Second, to understand the intentions behind the policy considerations one needs a deeper understanding in the underlying discussions and agreements between policymakers on the final environmental strategy. This requires an in-depth understanding of the process and discussions. The best strategy to do so is by using case studies, as they offer deep insight in a limited number of units of analysis (Creswell, 2013; Verschuren & Doorewaard, 2007). By

using case studies one can then gain a deep understanding of the type of discussions on monuments' care and the reasoning behind the policy considerations, creating an understanding of why certain considerations were made or were not made.

Solely using case studies focusing on the intentions of policymakers ignores the reality that intentions are not legally part of any plan. Solely focusing on desk research and the content of environmental strategies ignores the reality that policymakers often have additional considerations beyond what they put on paper. Consequently, a combination of both desk research and case studies serves as the best way to map the full policy considerations made by policymakers. Moreover, the combination provides a solid basis of data triangulation (Van Thiel, 2015 p. 65), enhancing the validity of the findings.

In addition to determining the quality of the policy considerations by using both desk research and case studies, one also needs to determine the possible contributions of policy integration and public participation to the found quality. Understanding the contribution of policy integration means exploring internal working of municipalities, while understanding the contributions of public participation means examining the contributions made through the participation process. Both require a deeper understanding of a process and ask not for an objective result among many units, but rather for a subjective understanding of a process in a small number of units, so as to understand a complex process. Both the relative amount of information in a process or the presence of synergy cannot be quantified, nor determined from existing documents as these are not process descriptions, nor can the experienced contributions of participation for the work of policymakers. The contributions of public participation are not explicitly documented and are only clear to those involved with the development of the environmental strategy, as they were affected directly by the public participation and can pinpoint the consequences of the organized participatory sessions. Consequently, once again the most suitable research strategy would be case studies, which offer the opportunity for understanding a deep insight in a limited number of units of analysis (Creswell, 2013; Verschuren & Doorewaard, 2007).

The case studies for both understanding the quality of the considerations made and the contribution of the processes of integration and public participation should be done at the same time. I use the word *should* intentionally, as the link between understanding the

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considerations of policymakers and the discussions they have had are intertwined with the integration and participation processes they have gone through. Therefore, case studies of the policy considerations and of the effects of policy integration and public participation should be done for the same cases. For the selection of cases from the municipalities that have an environmental strategy, it is important to realize that municipalities in many ways are similar with regards to monuments' care. First, for all municipalities the institutional context is similar in the sense that they legally have the same obligations towards monuments' care. Moreover, they also have roughly similar experiences with the previous legislation under which they already were responsible for monuments' care. The only main difference between municipalities in monuments' care is the number of monuments present in the municipality.

Consequently, for the selection of the relevant municipalities the number of national monuments per 1000 inhabitants in that municipality has been used (Rijksdienst voor het Cultureel Erfgoed, n.d.b). Generally speaking if one has more monuments in the municipality chances are higher that some attention is paid to these monuments. Therefore, it would not be surprising if municipalities with far more monuments have more policy considerations than those who do not have so many monuments. However, this does not say anything about the process in which these considerations were made, because the considerations are then only a logical consequence of having more monuments. Consequently, to fully grasp what the influence is of policy integration and participation on the differences in the quality of policy considerations between municipalities, one has to account for the number of monuments.

To ensure that the quality of policy considerations found and the possible effect of integration and participation is not merely a reflection of the number of monuments' in a municipality one should select cases which differ. By doing so, one accounts for a difference in the independent variable of number of monuments and the influence on the dependent variable, policy considerations. A list of municipalities with the number of municipalities per 1000 inhabitants can be found in Appendix I. Four categories of municipalities have been created which represent municipalities, which within their respective category might be regarded as homogenous cases (Yin, 2003), due to their similar context and presence of monuments. Consequently, there are four different cases, which contain municipalities which can be regarded as having a 'similar' context. Which municipalities one selects from within these four cases is rather irrelevant as one can expect similar attention to be paid to

monuments' based on their context. The four cases which are researched are found in table 4.1

Category	Municipalities <sup>4</sup>	Selection
Few (0 - 1.5 per 1000)	Almere, Hillegom, Uden, Hellendoorn, Katwijk, Emmen,Bladel, Reusel-De Mierden, Ridderkerk,	Hillegom, Hellendoorn
Moderate (1.5 - 3 per 1000)	Tilburg, Nunspeet, Oldebroek, Bergen (L), Noordwijk, Oisterwijk, Westvoorne, Hollands Kroon, Sittard-Geleen	Tilburg, Bergen (L), Hollands Kroon
Many (3 - 4.5 per 1000)	Aa en Hunze, Leusden, Groningen, Opsterland, Zwolle	Leusden, Zwolle
Very many (4.5+ per 1000)	Alkmaar, Oldambt, Ommen, Steenwijkerland, Voorst, Noordenveld, Voerendaal, Oirschot, Renswoude, Elburg, Staphorst, Waterland	Alkmaar, Renswoude

Table 4.1 Categories of municipalities.

By using diverse cases (Gerring, 2009), one accounts for variation in the policy considerations found and would not mistakenly assign differences to the other independent variables of integration and participation. Within the four case contexts I have at random selected two or three municipalities to investigate. Two or three municipalities were selected per case to avoid overgeneralizing one municipality as a representative of the case instead of understanding it as a mere reflection of all municipalities included in the case. More importantly, selecting two or three municipalities per case also allows room for the possibility that variables, which might be of relevance but are yet unknown to the researcher, are present and might in addition to the number of monuments, integration and participation, also be of influence. If this is the case and one selects only one municipality per case, one risks assuming that differences found are the consequence of the number of monuments, while this might not be the sole explanation.

<sup>&</sup>lt;sup>4</sup> All municipalities that have actively shared their environmental strategy at mijnomgevingsvisie.nl have been included here

#### 4.1.1 Reliability and validity

Before one can turn to how the data for the case study and desk research are collected, first some attention needs to be paid to the reliability and validity of the strategies. To begin, case studies have a limited reliability as coincidences and specific circumstances have a large influence, as one is only studying a small number of cases. A repetition of a similar research on different cases most likely will not lead to the same results (Vennix, 2011; Van Thiel, 2015). However, here the goal is to determine what the policy considerations were and what the possible contributions of integration and participation existed of. If by repetition different information is found, this does not mean that the previous information is wrong or misguided, just that there is more possible information to be found (Van Thiel, 2015).

Although the reliability is not ideal, the importance here is that the information found is valid, so that one is certain that the found data on integration and participation can be regarded as valid beyond doubt. Therefore not so much the reliability is of importance here, but the validity of the findings. The internal validity, which concerns the question if one measures what one wants to measure, is high in case studies, as questions are based on operationalisation of theoretical constructs and the questions are open leaving room for all possible answers (Verschuren & Doorewaard, 2007; Van Thiel, 2015 p. 109). To ensure high internal validity one must account for why concepts are measured the way they are (Yin, 2014). In this study this can be guaranteed in two ways. First, the theoretical causal relations and the different concepts to describe them are based on previous proven research on integration, policy quality and public participation. Consequently, one can assume that the concepts one is looking for are in fact concepts which are relevant and can be found 'out in the field'. Second, the operationalisation of the concepts (see section 4.2.2) is based on the use of the concept in earlier research and therefore already has been tested and used to map and measure the theoretical concepts used. This combination should ensure proper internal validity.

Although internal validity is high with case studies, the external validity, the generalizability, is not very high (Creswell, 2013). However, due to the use of diverse cases and by selecting within the four cases two or three municipalities on a total of only 33 municipalities, part of the generalizability issue is overcome. On the one hand, a sufficiently large number of municipalities which have finished are included in the research, roughly

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30%. On the other hand, by using multiple municipalities per case one avoids the problem of generalizing too much based on findings of one case which might be, unknown to the researcher, far from typical. In short, although case studies have issues of reliability and external validity, these are accounted for by on the one hand prioritizing not generalizability but internal validity and on the other hand by including a sufficiently large number of municipalities in the case studies to overcome part of the problem of generalizability.

#### 4.2 Data Collection

Now that it is clear that in order to answer the main question both case studies and desk research are necessary, I turn to which information exactly is collected based on both content analysis and interviews. First, the goal of both content analysis and the case studies is discussed and what information is to be gathered based on the two strategies. Second, an operationalisation of the variables used is offered.

#### 4.2.1 Goal of data collection

The first part of the goal of this research was *to determine the quality of policy considerations that is delivered for monuments' care in the environmental strategies of Dutch municipalities.* In the previous part of this section it was determined that the policy considerations of municipalities carrying a legal basis, can only be determined based on desk research. Policy considerations of municipalities can be found in the environmental strategies, which are published by the municipalities after the Municipal Council has approved of the strategies. By using a content analysis of the text of environmental strategies one can determine the presence of the three dimensions of policy considerations: Legality, reachability and acceptability. To collect information on the three dimensions of policy considerations in environmental strategies. In order to do so an operationalisation of the three dimensions is offered in the next part of this section (4.2.2, table 4.2.1).

This content analysis is executed for all 33 municipalities which have uploaded their environmental strategy to mijnomgevingsvisie.nl, which offers an overview of the municipalities which have completed the process of writing an environmental strategy<sup>5</sup>

<sup>&</sup>lt;sup>5</sup> I am aware of the fact that more municipalities than those who have uploaded their environmental strategy to this website have in fact completed their environmental strategy. However, it is difficult to

(Gemeente Elburg, 2018; Gemeente Oisterwijk, 2016; Gemeente Ommen, 2012; Gemeente Westvoorne, 2016; Gemeente Waterland, 2017; Gemeente Staphorst, 2018; Gemeente Oirschot, 2017; Gemeente Noordenveld, 2017; Gemeente Steenwijkerland, 2017; Gemeente Voerendaal, 2016; Gemeente Opsterland, 2015; Gemeente Opsterland, 2015; Gemeente Oldambt, 2017; Gemeente Groningen, 2018; Gemeente Aa en Hunze, 2019; Gemeente Sittard-Geleen, 2016; Gemeente Oldebroek, 2018; Gemeente Nunspeet, 2018; Gemeente Ridderkerk, 2017; Gemeente Katwijk, 2018; Gemeente Reusel-De Mierden, 2018; Gemeente Bladel, 2017; Gemeente Uden, 2015; Gemeente Almere, 2017; Gemeente Hillegom, 2018; Gemeente Tilburg, 2015; Gemeente Zwolle, 2017; Gemeente Alkmaar, 2017; Gemeente Voorst, 2017; Gemeente Hollands Kroon, 2016; Gemeente Bergen, 2019; Gemeente Renswoude, 2018; Gemeente Hellendoorn, 2014; Gemeente Leusden, 2018). In analysing the environmental strategies I have only focused on the main strategy. Some municipalities have created a main environmental strategy but have dubbed older strategy documents as 'sub-strategies'. Although this makes sense for municipalities who have just updated their parts of the old structural vision, this is not in line with the EPA (VNG, n.d.b). EPA in fact asks for only one environmental strategy on which the VNG writes: 'It is the goal to later have one coherent vision on a strategic level, explicitly not a sum of existing policy strategies for separate domains' (VNG, n.d.b) (own translation LS). Consequently I have decided to only consider the main vision for the content analysis as this is in the sense of EPA the only true environmental strategy of the municipality.

In the previous part of this section it already became apparent that only determining the policy considerations which have made the text of the strategy would be insufficient for determining the quality of considerations, as many considerations might have been made but which have not made the final document. Consequently, in order to fully reach the goal of *determining the quality of policy considerations that is delivered for monuments' care in the environmental strategies of Dutch municipalities,* one needs also to understand the considerations and discussions which have not made the environmental strategy. To do so, for the different cases selected (table 4.1), interviews are conducted to determine the policy

say how many have done so. The reason for selecting those who have participated with this website is the underlying idea that a municipality sharing its environmental strategy also feels that it might serve as a guide for others. Consequently, understanding the quality they provide becomes more relevant as they also might serve as examples for others.

considerations which have been present in writing the environmental strategy. In the interviews data is collected on the three different dimensions of policy considerations: legality, reachability and acceptability. In order to collect data on the three variables in an interview, and not with a content analysis, a different operationalisation of the three variables from the operationalisation used for the content analysis is offered in section 4.2 (table 4.2).

The second part of the goal of this research was to determine [...] whether policy integration and public participation have played a part in this [policy considerations found]. As discussed under research strategy case studies are used to do so. To be able to understand whether integration and participation have contributed one needs to understand first, whether integration has either a positive or negative contribution. Consequently, one needs to determine the positive effects of the presence of synergy and the possible negative effects of the presence of information relativity. Interviews were regarded as the most suitable method, as interviews offer the possibility to in-depth question the civil servants involved and determine whether they have truly experienced the effects of these two processes. Second, to determine whether participation has benefits one can examine whether preferences of local citizens or local knowledge was included, if all groups in society voiced their concerns, if the perception of legitimacy increased and if the legal requirements were met. Once again interviews were deemed the most suitable method, as interviews offer in-depth understanding of the consequences of the participatory settings. The interviews for participation should be focused on civil servants who were part of the complete process, as they experience the effects of public participation on the proposals they made and have more of an overview of the consequences for the environmental strategy than citizens involved. In order to collect data on the three variables, synergy, information relativity and participative benefits, in an interview, an operationalisation is offered in the next part of this section (4.2) in table 4.3.

#### 4.2.2 Operationalisation

The operationalisation of the dependent variable, quality of policy considerations, and its three dimensions faces two challenges. First, the dimension of acceptability is focused on a normative perception of spatial quality. This is challenging in the sense that reports accept this to be present by the (implicit) support offered for a policy by citizens (ROB, 2008 p. 59; Hemerijck, 2003). This creates shortcomings in this case in two ways. On the one hand, this

research focuses on the evaluation before the implementation of a policy, making it difficult to determine implicit support of citizens who have not yet felt the consequences of the policy. On the other hand, acceptability of a policy is challenging to capture in indicators, as one is referring here to perception of space. This can present itself in many varying forms (Tuan, 2011). Consequently, for acceptability the indicator used is based not on previous measurements but on a more broad understanding of what acceptability might entail. This means that through axial coding (Creswell, 2014) an understanding of acceptability in environmental strategies is compiled and is only pinpointed through the coding and not through clearly demarcated indicators beforehand.

Second, measurements of the quality of policy based on the three dimensions offered by Hemerijck (2003) do exist (ROB, 2008; Korsten, n.d.; Berndsen, Fraanje, Korsten & Kort, 2007), but assume that policies are evaluated both ex-ante or ex-post based on fully fledged policies. To determine whether a policy is legal based on the full overview of instruments and actions taken, is different from evaluating a policy of which only strategies and intentions exist, but no concrete measures are proposed yet. This difference between quality of considerations and quality of the full policy also means that those indicators used by different reports for legality and reachability (Korsten, n.d., p. 4-6; Berndsen et al, 2007 p. 21-24; ROB, 2008 p. 54-60; Hemerijck & Hazeu, 2004 p. 62-64) are not one-on-one applicable as indicators to determine the quality of policy considerations. Consequently, the indicators found for the three dimensions of policy considerations are either based on a broad indicator, giving room for a broad understanding of acceptability, or based on existing indicators altered to not reflect policy quality of full-fledged policies but rather to reflect quality of considerations present in discussions and strategy documents.

The operationalisation is split into three parts. First, the operationalisation for the content analysis in table 4.2 contains only the three dimensions of quality of policy considerations, as the contributions of policy integration, relativity of information and public participation are not well measured by content analysis.

Second, table 4.3 contains the operationalisation of the three dimensions of quality of policy considerations for the interviews. The indicators used for the three dimensions of policy considerations for the content analysis are rather similar to those of the interviews but

reflect the fact that here only what is in fact in the text can be coded, while those of the interview reflect the idea that many discussions might have been present without necessarily making it to the strategy.

Third, the operationalisation of the independent variables, public participation, synergy and information processing, measured only through the interviews, can be found in table 4.4. For synergy two indicators are taken from studies focusing on the consequences of policy integration (Bakvis & Juillet, 2004; Pollitt, 2003), while a third indicator is included based on a measurement scale for synergy in health policy but also referred to in studies on policy integration (Tosun & Lang, 2017; Pollitt, 2003; Jones & Barry, 2011). For collaborative benefits the four outlined benefits of public participation as formulated by Innes & Booher (2004 p. 422) are used. For the information processing a combination of insights from the information processing theory and the policy integration theory are used to reflect the consequences of the one for the other. Consequently, ideas from serial processes and the limits of attention (Baumgartner & Jones, 2005; Workman, Jochim & Jones, 2009) are combined with ideas of the consequences of integration (Pollitt, 2003; Christensen & Lægreid, 2007).

Besides containing the relevant indicators for the variables, the tables all offer a score of 'yes/partial/no' for the indicators. One might argue that scoring using only three options limits the depth of the understanding of the indicators. However, the choice for using only three options for scoring was made purposefully. The scope of this research is broad, determining the quality of many environmental strategies, which means a more readily usable scoring method is more applicable. If one aims to compare two municipalities, the nuance between their environmental strategy is central and there should be more scoring options. However, here the aim is to understand the quality for many environmental strategies and creating more scoring options would hamper the reach. More importantly, using a wider scoring range for an indicator would suggest it is possible to distinguish various scores for one indicator with certainty. However, this is not the case as environmental strategies are unique to every municipality and not readily compared in a nuanced manner. Consequently, it is not possible to use many scoring options as it would suggest one could in fact with certainty distinguish these options in the environmental strategies, but this is not the case.

Dimension	Definition	Indicators	Score
Acceptability	'The intersubjective appreciation of policy by citizens' (Hemerijck & Hazeu, 2004 p. 60)	<ul> <li>Reference to normative argumentation based on feelings, norms and values (Hemerijck &amp; Hazeu, 2004 p. 60)</li> </ul>	Yes/partial/no
Reachability	The extent to which political, administrative and civil organisation can and want to cooperate with the implementation of policy (Hemerijck & Hazeu, 2004 p. 59)	<ul> <li>Reference to existing policies and agreements</li> <li>Reference to interested actors</li> <li>Reference to the possibilities of implementation of the policy</li> </ul>	Yes/partial/no
Legality	Law-abidingness of the action of the government (Hemerijck & Hazeu, 2004 p. 60)	<ul> <li>Tasks prescribed in EPA have been accomplished in the strategies</li> <li>Proposals are in line with existing legislation and AWB</li> </ul>	Yes/partial/no

Table 4.2 Operationalisation three dimensions of policy considerations for content analysis.

# Table 4.3 Operationalisation three dimensions of policy considerations for interviews.

Dimension	Definition	Indicators	Score
Acceptability	'The intersubjective appreciation of policy by citizens' (Hemerijck & Hazeu, 2004 p. 60)	<ul> <li>Reference to normative argumentation based on feelings, norms and values (Hemerijck &amp; Hazeu, 2004 p. 60)</li> </ul>	Yes/partial/no
Reachability	The extent to which political, administrative and civil organisation can and want to cooperate with the implementation of policy (Hemerijck & Hazeu, 2004 p. 59)	<ul> <li>Discussions on the relation of the considerations with existing policies</li> <li>Discussion on the role of other interested actors</li> <li>Discussion on the practicability of the intended considerations</li> </ul>	Yes/partial/no
Legality	Law-abidingness of the action of the government (Hemerijck & Hazeu, 2004 p. 60)	<ul> <li>Tasks prescribed in EPA have been accomplished in the strategies</li> <li>Proposals are in line with existing legislation and AWB</li> </ul>	Yes/partial/no

Dimension	Definition	Indicators	Score
SynergyThe creation of be solutions as a consequence of complementary perspectives and partnership betwe actors (Jones & Barry, 2011, p. 37		<ul> <li>Avoid contradictions between spatial domains (Pollitt, 2003)</li> <li>Insights other spatial domains used in monuments' care(Jones &amp; Barry, 2011 pg. 39)</li> <li>Active discussion of relation monuments' care with other spatial domains (Pollitt, 2003; Bakvis &amp; Juillet, 2004)</li> </ul>	Yes/partial/no
Information processing	Dependedness of attention to information on the current total flow of information (Baumgartner & Jones, 2005 p. 62)	<ul> <li>Multiple policy areas are intertwined in discussion (Baumgartner &amp; Jones, p.63)</li> <li>Individual discussion of policy areas (Pollitt, 2003)</li> <li>Change in attention for policy areas (Workman, Jones &amp; Jochim, 2009; Christensen &amp; Lægreid, 2007)</li> </ul>	Yes/partial/no
Participative benefits	Positive consequences of public participation (Innes & Booher, 2004)	<ul> <li>Determine preferences of citizens</li> <li>Incorporating local knowledge to improve the quality of the decisions</li> <li>Creating justice opportunities for all groups of society to voice their concerns</li> <li>Generate legitimacy for the policy (Innes &amp; Booher, 2004 p. 422)</li> </ul>	Yes/partial/no

Table 4.4 Operationalisation independent variables for interviews.

In appendix II one can find the interview guide based on the operationalisations offered in table 4.2 and 4.3. The interview guide combines the operationalisation of both the tables as the questioning for the different variables is combined into one interview per case. In appendix VI one can find an overview of the respondents for the interviews. The respondents needed to be able to have a full understanding not only of monuments' care, but also of the process leading up to the environmental strategy, the various policy domains discussed and the eventual outcome of the strategy for three reasons. First, to understand the considerations made the respondent needed to have an understanding of the final product. Second, to understand whether synergy and information-relativity were present one needs to know the amount of attention devoted to monuments' care relative to the other topics and the integration of monuments' care into other topics. To avoid respondents giving an coloured

answer to questions regarding information-relativity they were not told beforehand of the specific focus on the policy domain of monuments' care. Third, to understand the effects of public participation the respondent needed to have knowledge of both the situation before and after the participatory sessions and to evaluate the impact the sessions had on the participants. Consequently, only civil servants involved in writing of the general document and part of the participatory sessions were deemed suitable as respondents. Therefore, the ten respondents that were selected were either programme managers, part of the main team developing the strategy or were consultants for the full development of the strategy. The interviews are semi-structured, with ample room for deviation from the questions and additional topics which might emerge during the interview. Semi-structured interviews are preferred as to enlarge the possibility of capturing all relevant questions and themes related to the research, without losing sight of the relevant variables and themes which need to be discussed to find an answer to the main question of the research (Vennix, 2011).

#### 4.3 Data Analysis

Finally, as it is clear now that the strategies used are desk research and case studies and the ways of collecting the data is through content analysis and semi-structured interviews, I turn to how to analyse the data collected. In order to analyse the data from the interviews and acquired by the content analysis, one can best turn to coding the data (Vennix, 2011). From the interviews a transcription has been made, while with the content analysis all parts of the environmental strategies that refer to monuments' care and policy considerations have been compiled. To make a reliable and predictable analysis of the interviews and the environmental strategies coding is used (Creswell, 2013). Coding is a process in which selected parts of text are reconstructed into categories of information. The categories determined by coding can be linked to one another and used to create a more insightful and reliable overview of the results (Van Thiel, 2015; Creswell, 2013).

For the coding of the environmental strategies used for the content analysis a combination of sensitizing concepts and axial coding is used (Creswell, 2013). The theoretical categories are defined based on operationalisation of legality, acceptability and reachability in earlier research on policy quality. The indicators developed serve as sensitizing concepts while coding, which means they guide the coding, but are not the final

indicators. As the theoretical categories are applicable to policy quality and not policy considerations, the indicators are provisional and are replaced during the coding process with more suitable indicators, while maintaining the same main three considerations. Consequently, the three major dimensions of policy quality remain the same as operationalized in table 4.2, but the indicators presented there are provisional and are replaced during the coding process called axial coding. This way using sensitizing concepts one shapes new indicators which more accurately fit the intended dimensions of policy considerations instead of full-fledged policy.

The same combination of sensitizing and axial coding is also used to analyse the interviews. For the focus on policy considerations this follows the same idea as with the content analysis in that first the theoretical broader dimensions are known and are the focus of the coding, as done with sensitizing concepts (Creswell, 2013). At the same time the subcategories of the three main theoretical categories are once more approached in a more inductive way through axial coding, so as to leave ample room for findings which have not been theorized and operationalized beforehand. The combination of coding in the interviews and the content analysis reshapes the actual operationalisation of the three dimensions of quality. This means the operationalisation in the tables 4.2 and 4.3 was provisional and the actual indicators used were shaped during the coding. The operationalization that was shaped during the axial coding process using sensitizing concepts for the three dimensions of quality of policy considerations is presented in table 4.5. One can see that the three broad categories have remained the same, but that the indicators have been reshaped during the axial coding the axial coding the three policy considerations. The new indicators found during the axial coding are extensively discussed in the next section.

Dimension	Definition	Indicators	Score	
Acceptability	'The intersubjective appreciation of policy by citizens' (Hemerijck & Hazeu, 2004 p. 60)	<ul> <li>Reference to desired state of monuments</li> <li>Reference to desired use of monuments</li> <li>Reference to desired influence of monuments of spatial development</li> </ul>	Yes/partial/no	
Reachability	The extent to which political, administrative and civil organisation can and want to cooperate with the implementation of policy (Hemerijck & Hazeu, 2004 p. 59)	<ul> <li>References to the practicability of proposed considerations with regards to preservation, conservation and usefulness</li> <li>Reference to other interested actors that play a role in the protection of monuments' care</li> </ul>	Yes/partial/no	
Legality	Law-abidingness of the action of the government (Hemerijck & Hazeu, 2004 p. 60)	<ul><li>Description of the quality of space</li><li>Description of the quality of place</li></ul>	Yes/partial/no	

#### Table 4.5 Operationalization of concepts after axial coding.

The analysis of the data on policy integration and public participation is done in a more preconfigured way, as the concepts are more theoretically defined in earlier research and therefore can be structured more along the line of predetermined categories, with the certainty of capturing the concept one actually wants to measure. Therefore the operationalization presented in table 4.5 is also the final operationalization used in this research. For the nine interviews a total of 240 codes were used, while for the content analyses of the 33 municipalities a total of 224 codes were used. In appendix III one can find an overview of which codes belong to which indicators. In appendix IV one can find which codes have been assigned to which environmental strategy. In appendix V one can find which codes have been assigned to every interview held.

## 5. The quality of policy considerations

In this section first, I examine the quality of the environmental strategies of 33 municipalities. I do so by discussing the presence of the seven aspects of legality, acceptability and reachability, which were identified in the previous section. Using the seven aspects I determine which municipalities have a high, moderate or low quality environmental strategy. Second, using the interviews in nine municipalities, I show that the quality of environmental strategies is often higher than one expects based on an analysis of their environmental strategies, as municipalities have many additional considerations which they have not included in their strategies.

## 5.1 Overview of the quality of environmental strategies

Based on the coding of the environmental strategies of 33 municipalities, which can be found in Appendix IV, it becomes apparent that the consideration that is taken into account most is acceptability. Table 5.1 illustrates this, showing the division of codes per aspect of quality of policy considerations. With 224 codes used, acceptability has the largest share with 97 codes, or 43% of the total number of codes, followed by reachability with 23% and legality with 17%. This shows that most of the policy considerations for monuments' care in fact have been focused on normative questions. The overview is slightly tainted by the way coding was done, as a code once assigned would not be assigned again, to avoid false certainty of quantity of discussion above quality. Consequently, the fact that reachability is more coded than legality is not because it was more discussed in environmental strategies, but because more different aspects of reachability were discussed.

Aspect of quality of policy considerations	Percentage of total codes
Acceptability	43%
Reachability	23%
Legality	17% <sup>6</sup>

Table 5.1 Division of code	es per aspect o	of quality of policy	considerations.
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As one can gather from table 5.2, almost all municipalities have some discussion of the acceptability of the considerations in their environmental strategy. The same can be said

<sup>&</sup>lt;sup>6</sup> This does not add up to 100% as there is also a category additional codes

for legality, with all but four municipalities including the necessary policy considerations to adhere to the legal requirements. Reachability is also present in the considerations of most municipalities, with only 8 out of 33 not discussing any component of the reachability of their considerations for monuments' care. Most municipalities combine three of the considerations in their environmental strategies, with eight municipalities taking into account only two aspects of quality of policy considerations or less.

Combination	Share	Municipalities
-	2 (6%)	Uden, Bladel
Acceptability	1 (3%)	Ridderkerk
Acceptability + Legality	5 (15%)	Aa & Hunze <sup>7</sup> , Nunspeet, Almere, LeusdenBergen
Acceptability + Reachability + Legality	25 (75%)	Elburg, Oisterwijk, Waterland, Noordenveld, Steenwijkerland, Voerendaal, Opsterland, Groningen, Oldebroek, Katwijk, Reusel-De Mierden, Tilburg, Voorst, Renswoude, Hellendoorn, Ommen, Westvoorne, Staphorst, Oirschot, Oldambt, Sittard-Geleen, Hillegom, Alkmaar, Hollandse Kroon, Zwolle
	Total = 33	

Table 5.2 Combinations of considerations present per environmental strategy.

However, a description of the division of considerations made does not tell the full story of quality. The overview offered in table 5.2 on the one hand, shows what considerations are made and which municipalities have painted a more rounded picture of the policy considerations regarding monuments' care. On the other hand, table. 5.2 does not give insight into how the considerations look like and whether the considerations are complete, or whether just parts of considerations of legality, acceptability and reachability were included. To understand what composes the quality of the considerations of municipalities one needs to understand per aspect what is relevant and whether all considerations are made. This can for instance be illustrated by the example of acceptability. The fact that one has made a description of the desired use of monuments in the municipality means a consideration of acceptability is present. However, it is not fully complete without deliberations on the desired state or influence of the monuments on its surroundings, which is often not done. Therefore,

<sup>&</sup>lt;sup>7</sup> Only environmental strategy for limited part of territory

table 5.2 does show the combination of qualities but gives no answer to the question of whether the considerations made were actually complete considerations, or just partial consideration of the aspect. As a consequence, it is important to examine per aspect which considerations can be made by municipalities and which municipalities have done so.

#### 5.1.1. Acceptability

The quality of the policy considerations made regarding acceptability, the intersubjective appreciation of policy, can be measured by the presence of three deliberations: the desired state, the desired use and the desired influence of monuments. First, the desired state contains deliberations regarding the future development of monuments: what monuments should look like in the future, what they should contain or not contain and their place in the community. This can be for instance seen in the municipality Oisterwijk which fields the broad demand of 'monuments should be protected within their current context' (gemeente Oisterwijk, 2016) or the municipality Hillegom which writes that they want to 'preserve and make visible' (gemeente Hillegom, 2018, pg. 45). For the desired state not an expansive description is needed, but an intention of how a monument should look like or be developed is sufficient to offer a direction for the plans of the municipality.

Second, the desired use of monuments in a municipality contains the deliberations regarding the visibility, the usage, the experience and the accessibility of the monument. This describes the way the monument might be put to use for the community and how people might enjoy or use monuments. This differs from the desired state as here the focus is not on how the municipality wants the monument to look like in the future, but how its inhabitants might enjoy and regard the monument. For instance the municipality Elburg writes 'everyone must be able to experience the pearls and other qualities' (gemeente Elburg, 2018), while the municipality Voerendaal writes that it should make 'the Roman past, its (national) monuments and characteristic housing experienceable' (gemeente Voerendaal, 2016, p.25).

Third, the desired influence of monuments in a municipality contains the deliberations regarding the impact monuments might have on the spatial development in its direct surrounding, or more broadly in the municipality in general. This means questions of suitability of spatial developments with regards to a monument and how new spatial developments might be influenced or determined by the existing heritage in the surroundings.

The desired influence differs from the state as the focus here is not specifically on the monument but on the surroundings, and it differs from use as the focus with influence is not the factual usage or direct experience of the monument, but on the effect the monument might have on the built environment. Examples of this can be found for instance in Alkmaar, which writes that 'heritage is a source of inspiration for the future' or 'new developments have to be in tune with the [...] existing buildings in the city centre' (gemeente Alkmaar, 2017, p.15).

Consequently, if one combines the presence of the desired state, use and influence as necessary deliberations to fully capture the acceptability of the considerations surrounding monuments' care, a different picture can be painted than the one in table 5.2. While all but two municipalities have an aspect of acceptability in their environmental strategy, only nine out of 33 municipalities cover all three aspects of acceptability in their strategy: Ommen, Noordenveld, Katwijk, Reusel-De Mierden, Tilburg, Zwolle, Alkmaar, Hellendoorn and Leusden.

#### 5.1.2 Reachability

The quality of the policy considerations made in the environmental strategies of municipalities regarding reachability, the extent to which public and private actors can and want to participate in a policy, can be measured by the presence of two deliberations: the practicability and the involvement of relevant actors. First, the practicability is focused on the deliberations made regarding the options municipalities have with regards to monuments' care in the face of the many other policy issues they also have to deal with. The focus here is therefore on trade-offs between full preservation or use, conservation and development. Examples of this can be found for instance with Hellendoorn which writes that '[...] the re-usage of characteristic buildings for new functions, which stimulates the preservation of monuments or characteristic buildings better' (gemeente Hellendoorn, 2014, p. 27).

Second, the involvement of relevant actors includes deliberations of municipalities focused on including actors for support of the policy and finding actors that also have a stake in the policy of the municipality with regards to monuments. On the one hand, there is a stark difference between the involvement of relevant actors and the practicability of a proposal, as the involvement of actors is focused on support of actors while practicability is focused on the opportunities and trade-offs a municipality has to make. For example, the municipality Westvoorne includes in its considerations 'by fitting the local heritage in larger regional and national structures we want to increase the support for the preservation and qualitative development' (gemeente Westvoorne, 2016). This is clearly not a question of practicability, but a question focused on garnishing support for the policies of the municipality for preserving the monuments.

On the other hand, the involvement of relevant actors and practicability overlap partially as sometimes the involvement of these actors is exactly why monuments cannot be solely preserved but also should be developed, or cannot be solely conserved but also serve a purpose beyond being a monument. A good example of this can be found for instance with the questioning of monumental churches in Oisterwijk, about which the municipality writes 'We have the task to give another function to the building [...] However in the end the diocese decides what happens to the locations and buildings' (gemeente Oisterwijk, 2016). This shows that the question of practicability and relevant actors sometimes are intertwined.

In short, if one combines the presence of the relevant actors and practicability as necessary deliberations to fully capture the quality of the considerations made by municipalities for the reachability of the considerations surrounding monuments, once again a different picture can be painted than the one in table 5.2. For reachability seventeen out of 33 municipalities make the full considerations, taking into account both questions of practicability and reachability. Eight municipalities only take into account one of the two deliberations for reachability, while eight municipalities do not take into account reachability at all .

## 5.1.3 Legality

The legality of the considerations is different from the first two considerations of quality, in the sense that legality refers to whether the considerations made are sufficient in the eyes of law. The EPA dictates an analysis of spatial quality and how these qualities will be preserved, developed and used (Ros & Zomer, 2018). How the qualities of monuments are preserved, developed and used are questions of acceptability, and therefore are here regarded not as part of legality but as part of acceptability. The description of the spatial quality, however, is regarded as part of the legal demands made for an environmental strategy. The description of

spatial quality can be divided into what I would like to call qualities of space and qualities of place.

First, descriptions of the qualities of place are made with regards to the identity, history and the perception of the monuments in the territory of a municipality. I should stress that this does not necessarily entail a full-fledged description of the relation of a single monument to the environment, but might also entail a description of how monuments fit within the current context. For instance the municipality of Zwolle writes 'The historically meaningful city creates a strong identity and shared pride and also the conscience that we have cherished and preserved this beauty' (Gemeente Zwolle, 2017, pg. 23).

Second, descriptions of qualities of space are focused on the actual presence of monuments in a territory, regardless of the context or meaning the monuments have. This differs from descriptions of qualities of place in that it has no meaning attached to the description but just offers a factual overview of the presence of monuments. This is important for subsequent decisions in the environmental plan and strategy. A description of the qualities of space can either be done by hard cold facts such as the municipality of Waterland which writes 'the historic value of the four protected city-sites, the 320 National monument, the 120 municipal monuments [...] is an important strength we need to respect' (gemeente Waterland, 2016, p. 23). This is a clear description of the monuments present on the territory of the municipality. Other municipalities have chosen to develop heritage maps or heritage assessments such as Reusel-De Mierden, which writes that 'the historic values of Reusel-De Mierden are [...] assessed and valued in a digitale heritage map' (gemeente Reusel-De Mierden, 2018, p. 9).

In short, if one combines the presence of descriptions of space and descriptions of place, the necessary deliberations to fully capture the quality of the considerations made by municipalities for the legality of the considerations surrounding monuments, once again a different picture can be painted than the one in table 5.2. Only 11 out of 33 municipalities combine both a description of quality of place and space and therefore fully reach the legal requirements demanded. Two municipalities fail to have any of the two legal requirements as part of their environmental strategy, with the other 20 municipalities having only one of the two, mostly a description of place.

#### 5.1.4 Synthesis

The three considerations acceptability, reachability and legality, together form a standard of judging the quality of policy considerations. For these three considerations different aspects are important. First, for acceptability considerations of desired state, use and influence should be included for a high quality of the considerations of acceptability. Second, for reachability considerations of practicability and relevant actors should be included for a high quality of the considerations of quality of place and quality of space should be included for a high quality. Third, for legality considerations of legality. In total this means seven different aspects should be considered for the three considerations to have a high quality of policy considerations. An overview of the seven aspects for the three considerations is offered in table 5.3

Considerations	Aspect
Acceptability	Desired Use
	Desired Influence
	Desired State
Reachability	Practicability
	Relevant Actors
Legality	Description of place
	Description of space

Table 5.3 Policy considerations and their aspects.

If municipalities take into account five to six of these aspects the quality of their policy considerations can be considered moderate. If municipalities only take into account four or less of the seven aspects needed for the three policy considerations for monuments' care, quality can be considered low. An overview of the quality of the policy considerations of 33 municipalities based on their environmental strategies is presented in table 5.4. As one can observe, based on the policy considerations found in the environmental strategies of municipalities five municipalities can be considered to have a high quality of policy considerations. Thirteen municipalities can be considered to have a moderate quality of

policy considerations for monuments' care and fifteen municipalities can be considered to have a low quality of policy considerations for monuments' care.

Quality	Description	Municipality
High	All seven aspects of three policy considerations taken into account	Ommen, Reusel-De Mierden, Tilburg, Zwolle, Alkmaar
Moderate	Five to six aspects of the three policy considerations taken into account	Elburg, Waterland, Staphorst, Noordenveld, Voerendaal, Opsterland, Oldambt, Groningen, Sittard-Geleen, Katwijk, Hillegom, Hellendoorn, Leusden
Low	Four or less of the aspects of the three policy considerations taken into account	Renswoude, Bergen, Voorst, Almere, Uden, Bladel, Ridderkerk, Nunspeet, Oldebroek, Aa en Hunze, Steenwijkerland, Oirschot, Westvoorne, Oisterwijk, Hollands Kroon

Table 5.4 Overview of quality of policy considerations per municipality.

#### 5.2 Policy considerations in interviews

In addition to the policy considerations found in the environmental strategies, using the results of the interviews I now turn to the additional policy considerations which have been made by municipalities, but have not been included in their environmental strategies. I do so per category of municipality, based on the number of monuments per 1000 inhabitants. As discussed in the previous section, I expected the number of monuments per 1000 inhabitants to create a difference in the policy considerations made, as municipalities with relatively more monuments are more likely to give attention to monuments' care. I present the results from municipalities with few monuments per 1000 inhabitants to very many.

#### 5.2.1 Few monuments (0-1.5 per 1000 inhabitants)

For the case of few monuments two municipalities were visited for an interview: Hillegom and Hellendoorn. To begin, the municipality of Hellendoorn has roughly 35.000 people inhabitants, mainly in Nijverdal and Hellendoorn (CBS, n.d.). In Hellendoorn there are 0.8 National monuments per 1000 inhabitants, 30 in total (Rijksdienst voor het Cultureel Erfgoed, n.d.b.). First, in the environmental strategy Hellendoorn addresses all the three aspects of acceptability. Second, for reachability, the municipality has included questions of practicability in their strategy but has not referred to other relevant actors. Last, for legality, a

short description of the quality of place is offered, describing the identity and the atmosphere of the municipality in relation to the monuments in the municipality. However, there is no description of the quality of space and therefore only a partial consideration of the legality.

In addition to the considerations made in the environmental strategy, it became clear from the interview that Hellendoorn also made additional considerations. First, for acceptability mainly considerations of the influence of monuments on new projects was important, with discussions on the role of heritage in the development of new projects. For instance the respondent says 'where there is heritage, we look whether it can have a place in spatial development' (personal communication, 11 February 2020). Second, for reachability various considerations have been made, mainly in regard to the relevant actors. For the municipality monuments and the atmosphere monuments create are highly important for tourism, an important branch of work in the municipality. For example the respondent argues that 'Hellendoorn is attractive for tourists mainly due to the history and the heritage' (personal communication, 11 February 2020). In short, Hellendoorn already made most of the considerations but based on the interview additional considerations were found for reachability.

Next, Hillegom is a municipality in the province of South-Holland in the famous 'Bollenstreek'. There are around 22.000 inhabitants, mainly in Hillegom itself (CBS, n.d.). In Hillegom there are 0.3 National monuments per 1000 inhabitants, 7 in total, with an additional 22 municipal monuments (Rijksdienst voor het Cultureel Erfgoed, n.d.b.; Gemeente Hillegom, n.d.). In the environmental strategy Hillegom addresses the desired state and use of the monuments, but does not mention the intended influence of monuments on developments in the municipality, thereby covering two of the three aspects of acceptability. For the other two aspects of quality of policy considerations, reachability and legality, Hillegom covered all aspects.

In addition to the considerations made in the environmental strategy, the interview showed that all the aspects of the three considerations for quality were present. For instance, the aspect of desired influence, which was not apparent from the environmental strategy, was clearly in the mind of the respondent, arguing that 'what was done well in the past should serve as inspiration for the future developments' (personal communication, 27 February 2020). In short, Hillegom already in the environmental strategy had included most of the aspects of the three deliberations relevant for the quality of policy considerations. Based on the interview it became clear that in fact all aspects had been considered and often deeper than became apparent from reading the strategy.

#### 5.2.2 Moderate monuments (1.5 - 3 National monuments per 1000 inhabitants)

For the case of a moderate number of monuments three municipalities were visited for an interview: Tilburg, Hollands Kroon and Bergen. To begin, Tilburg is a municipality in the province of North-Brabant and one of the main logistic hubs of the Netherlands. There are approximately 220.000 people living in the municipality, mainly in the city of Tilburg (CBS, n.d.). In Tilburg there are 1.5 National monuments per 1000 inhabitants, 329 in total, with an additional 345 municipal monuments (Rijksdienst voor het Cultureel Erfgoed, n.d.b.; overheid.nl, n.d.). In the environmental strategy Tilburg addresses all aspects of acceptability, reachability and legality to some extent. Consequently, the environmental strategy of Tilburg in fact encompasses all deliberations needed for full quality of policy considerations.

In addition to the considerations in the environmental strategy, the interview shed light on even more considerations. For instance, for the description of the quality of place in Tilburg the respondents argue 'we are not protecting the stones but the story of the city which they contain' (personal communication, 24 February 2020). Moreover for the aspect of practicability discussions were held on the desirability of the level of involvement of the government. One of the respondents said 'depending on the relevance of the monuments in an area, your role as local government is different' (personal communication, 24 February 2020). In short, Tilburg already had an environmental strategy that encompassed all aspects of acceptability, reachability and legality, the necessary qualities of policy considerations. The interviews showed that even more additional considerations were present and that they were quite expansive.

Next, Hollands Kroon is a municipality in the province of North-Holland in the far north of the province, bordering the Waddenzee and the IJsselmeer. The municipality has almost 50.000 inhabitants, spread over numerous small villages (CBS, n.d.). In Hollands Kroon there are 2.6 National monuments per 1000 inhabitants, 128 in total (Rijksdienst voor het Cultureel Erfgoed, n.d.b.). In the environmental strategy Hollands Kroon addresses first two of the aspects of acceptability: desired state and desired influence. This means the desired use of the monuments is not directly referred to in the environmental strategy. Second, for reachability only the aspect of relevant actors was discussed, but not the aspect of practicability. Last, for legality the aspect of description of quality of place is discussed in the environmental strategy, but the description of the quality of space was not included.

In addition to the considerations made in the environmental strategy the interview shed light on a number of aspects not discussed in the environmental strategy. First, in the interview it became clear that there were descriptions of the quality of space made, the respondent saying about monuments that 'we are mapping it now' (personal communication, 12 February 2020). This means that in fact the consideration of legality was completely done by the municipality, but this was not shown in the environmental strategy. Second, in the interview it became apparent that considerations of desired use were also present in the municipality with 'user value' being central aspects of spatial quality for the municipality. Consequently, the municipality in fact made all considerations of applicability and legality and only missed part of reachability.

Finally, Bergen is a municipality in the province of Limburg, not to be confused with Bergen in North-Holland. The municipality is relatively small, with only 14.000 people in the municipality spread over a number of small villages of which Bergen is the largest one (CBS, n.d.). In Bergen there are 2 National monuments per 1000 inhabitants, 29 in total (Rijksdienst voor het Cultureel Erfgoed, n.d.b.). In the environmental strategy Bergen first addresses two aspects of acceptability, desired state and influence, leaving out the desired use. Second, for reachability the municipality does not address the two aspects in the environmental strategy. Last, for legality the municipality does shortly address a description of the quality of place, while not addressing any description of the quality of space.

In addition to the considerations made in the environmental strategy, the interview shed light upon two additional considerations made. First, although there was a short description of the quality of place in the strategy the respondent showed that for instance the relevance of a church in one of the villages for the community was underscored in the discussions. Second, the municipality also had a description of space which they had not referred to in the environmental strategy. The respondent argued that 'we have assessed all culturally historic relevant elements and the protected objects' (personal communication, 7 February 2020). Consequently, the municipality of Bergen did have a full consideration of legality, though still lacking parts of acceptability and not considering reachability for monuments' care.

#### 5.2.3 Many monuments (3 - 4.5 monuments per 1000 inhabitants)

For the case of many monuments per 1000 inhabitants interviews were held with two municipalities: Zwolle and Leusden. To begin, Zwolle is a municipality in the province of Overijssel and also the capital of said province. The municipality of Zwolle has approximately 130.000 inhabitants, with almost all inhabitants living in the city of Zwolle (CBS, n.d.). In Zwolle there are 3.8 National monuments per 1000 inhabitants, a total of 481, with an additional 320 municipal monuments (Rijksdienst voor het Cultureel Erfgoed, n.d.b.; monumenten.nl, n.d.). In the environmental strategy Zwolle addresses all aspects of acceptability, reachability and legality to some extent. Consequently, the environmental strategy of Zwolle in fact encompasses all deliberations needed for full quality of policy considerations.

Although Zwolle already had included all aspects of reachability, legality and acceptability the interview shed light on additional steps taken by the municipality not included in the environmental strategy. For example a participation session was organised around the topic of spirituality, which also touched upon the use of churches which no longer held services, a question of both practicability of the monuments' care and the involvement of relevant actors. Another example is the importance of monuments for new spatial developments, with the respondent stating that 'one of the biggest strengths of your municipality is the historic heritage, which you want to preserve and which qualities you want to take into account [when developing]' (personal communication, 2 March 2020). In short, the environmental strategy of Zwolle included already all elements of the three policy considerations necessary for a high quality and the interview shed light on even more considerations.

Next, Leusden is a municipality in the province of Utrecht, situated near the city of Amersfoort. The municipality has approximately 30.000 inhabitants, almost all living in the village of Leusden (CBS, n.d.). In Leusden there are 3.1 National monuments per 1000

inhabitants, a total of 99, with an additional 15 municipal monuments (Rijksdienst voor het Cultureel Erfgoed, n.d.b.; Historie Leusden, n.d.). In the environmental strategy Leusden addresses all aspects of acceptability in some form, covering the desired use, state and influence of monuments. However, for reachability Leusden has not included considerations for the two aspects, practicability and relevant actors. For legality Leusden included descriptions of the quality of place in the environmental strategy, but does not have a description of the quality of place. Consequently, Leusden has a full description of acceptability, a partial consideration of legality and no consideration of reachability in the environmental strategy.

In addition to considerations made in the environmental strategy, the interview in Leusden showed that considerations of reachability were also part of the discussions on the environmental strategy. Specifically the respondent mentioned the support of local politics for policies regarding monuments' care, referring to the relevant actors in reaching the intended policy goals. He said 'it was also a political wish in general to protect heritage' (personal communication, 10 February 2020). In short, based on the interview the municipality also had partial considerations of reachability for their environmental strategy. Still the considerations for legality and reachability were only partially made.

#### 5.2.4 Very many monuments (4.5 + per 1000 inhabitants)

For the case of very many monuments per 1000 inhabitants two municipalities were interviewed: Alkmaar and Renswoude. To start, Alkmaar is a municipality in North-Holland. The municipality has approximately 110.000 inhabitants, most of them living in the city of Alkmaar (CBS, n.d.). In Alkmaar there are 5.3 National monuments per 1000 inhabitants, 579 in total, with an additional 959 municipal monuments (Rijksdienst voor het Cultureel Erfgoed, n.d.b.; gemeente Alkmaar, n.d.). In the environmental strategy Alkmaar addresses all aspects of acceptability, reachability and legality to some extent. Consequently, the environmental strategy of Alkmaar in fact encompasses all deliberations needed for full quality of policy considerations.

Although Alkmaar has included all different aspects of reachability, legality and acceptability in its environmental strategy, the interview still showed that even more

considerations were made by the municipality. For example the respondent referred to a discussion about practicability of policies when saying 'Beemster has been given a monumental status, in practice a museum. That way you conserve what you have now for the future [...]. The question is if that is what we want' (personal communication, 17 February 2020). This shows the internal discussion about considerations of retaining current monuments versus the ability of the city to develop and change with times. This shows that Alkmaar, which already had considered all aspects of legality, acceptability and reachability, still had even more considerations which had not made the environmental strategy.

Last, Renswoude is a municipality in the far east of the province of Utrecht on the border with Guelders. The municipality is small, with approximately 5000 inhabitants (CBS, n.d.). In Renswoude there are 10.1 monuments per 1000 inhabitants, some 52 in total, with an additional 26 municipal monuments (Rijksdienst voor het Cultureel Erfgoed, n.d.b.; gemeente Renswoude, n.d.). In the environmental strategy the municipality addresses aspects of legality, reachability and acceptability, but for none of these three all the aspects are addressed. For acceptability the municipality addresses the desired influence of monuments on new spatial developments. For legality the municipality addresses the description of quality of place, but does not refer to description of quality of space. For reachability Renswoude refers to questions of other relevant actors, but not the practicability.

In addition to the considerations in the environmental strategy from the interview it became apparent that the municipality also discussed the desired state of the monuments and the desired use. The respondent for instance referred to accessibility and visibility of the Grebbelinie, stimulating the use of the monument. In addition, he also referred to the desired state as 'we just have to preserve this [...] no discussion' (personal communication, 5 February 2020). In short, in Renswoude additional considerations were made with regards to acceptability. Consequently, based on both the interview and the environmental strategy the municipality has considered all aspects of acceptability and only partially considered reachability and legality.

#### **5.3 Overview**

Now that policy considerations have been studied both by the use of a content analysis and have been supplemented with information from interviews, two points can be made about the

policy considerations in environmental strategies and about the importance of the number of monuments in a municipality for predicting the quality of policy considerations. First, the additional analysis of the interviews for policy considerations shows that municipalities without exception have made considerations with regards to monuments not put to paper. This is not to say they should have been put to paper, as there is limited space and a strategy can necessarily not include every detail of spatial considerations. However, it does show that municipalities always have additional considerations which can be relevant. Although, internally these considerations will most likely play a role in follow-up policies, there is no certainty for this as the internal considerations have not been put to paper and are therefore not communicated to the public, nor formally confirmed by the municipalities always have additional considerations overall. On the one hand, this is a rather positive finding as it implies that municipalities always have additional considerations overall. On the other hand, this implies that some considerations are not communicated to the outward world and do not create exactly that certainty about the vision of the municipality which a strategy was supposed to provide.

Second, in contrast to what was argued in the previous section there seems to be little relation between the number of monuments in the municipality and the extent of the considerations made. In table 5.5 an overview is offered of which aspects of the three considerations were present in the environmental strategies of municipalities, marked with an x. Additionally, if an aspect was not present in the environmental strategy but was mentioned in the interview it is marked with an +, so as to show the presence of the consideration but to differentiate it from those which have been confirmed by the council. As one can see there is no relation between having many monuments per 1000 inhabitants and the extent of considerations made. For instance Renswoude has most monuments per 1000 inhabitants, but does only partially consider reachability and legality and only has full consideration of applicability if one takes into account the interview. At the same time Hillegom, which has relatively few monuments, has, if one takes into account the interview too, considered all aspects of acceptability, legality and reachability.

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		Applicability		Reachability		Legality	
	State	Use	Influence	Practicability	Actors	Space	Place
Few							
Hellendoorn	X	Х	x	х	+		Х
Hillegom	X	Х	+	х	х	х	Х
Moderate							
Tilburg	х	х	x	х	x	х	Х
Hollands Kroon	х	+	х		x	+	х
Bergen	х		х			+	х
Many							
Zwolle	x	x	х	х	x	х	Х
Leusden	х	х	x		+		Х
Very many							
Alkmaar	х	х	x	х	x	х	Х
Renswoude	+	+	x		х		x

Table 5.5 Overview presence aspects of the three considerations.

Consequently, once one can be sure that the number of monuments does not predict the quality of the policy considerations made by municipalities. In the following section I turn to question whether policy integration and public participation have influenced the found quality and the theoretical implications of these findings.

## 6. Policy integration & public participation

From the previous section one can conclude that differences in quality are found between the environmental strategies of Dutch municipalities, with some municipalities making all the policy considerations while others do at best a few. In this section, I turn to the question of whether the main alterations introduced by the EPA, policy integration and public participation, have influenced the quality of the policy considerations made. First, I turn to a discussion on the possible downsides of policy integration for the quality of considerations made, in the form of information processing. Second, I discuss the possible benefits of policy integration for the quality of the policy considerations made in the form of synergy and the avoidance of policy considerations. Third, I examine the influence of participation on the found quality of policy considerations. I also include a short discussion on the problem of having an abstract discussion on integrated policy documents for participatory settings with citizens. Last, I discuss the relation between the concepts of information relativity, synergy and public participation, as these are found to be intertwined and cannot be seen as strictly separate processes that explain the quality of policy considerations.

#### 6.1 Downsides of policy integration

To begin, as seen in section 3, information processing can become a problem in a situation of policy integration. Issues which might have been able to reach the threshold of attention when competing in a pillarized situation with other issues, might in a situation of policy integration no longer reach this threshold, as other issues, previously not relevant for competition, manage to grab the attention. Consequently, no attention or little attention will be paid to issues deemed irrelevant, while attention might have been paid to these issues had they remained in a pillarized situation. Based on the interviews four conclusions can be drawn about the importance of information processing for the quality of policy considerations.

First, discussions which combine multiple spatial domains are not necessarily harmful to the quality of policy considerations of monuments' care. Based on the findings in municipalities such as Alkmaar and Zwolle, which have had fully integral discussions, heritage was still present in the discussions. For instance in Zwolle the respondent said 'we started with scrum-sessions, to ensure the integrality' (personal communication, 2 March 2020). Still in Zwolle heritage was discussed during the scrum-sessions, with the respondent arguing 'what is my Zwolle and what are the bearers of the city, well you list all these qualities including heritage' (personal communication, 2 March 2020). Monuments' care therefore is not a topic that necessarily disappears in an integral setting.

Second, a number of municipalities have one or more civil servants working specifically on heritage, which has two consequences. First, the civil servants from heritage also take part in the integral discussions and are more likely to bring up heritage. Second, the different parts of the environmental strategy are often discussed with experts. Consequently, discussions on heritage with experts take place in a more pillarized way in municipalities that have specific civil servants on heritage, in addition to the integral discussion also taking place. Four of the municipalities visited have one or more civil servants for heritage: Leusden, Zwolle, Tilburg and Alkmaar. For instance Alkmaar during the integral session heritage 'had a representative from the policy side' (personal communication, 17 February 2020) and afterwards organised 'expert tables', in which specific themes such as heritage were discussed. On the one hand, this means that although one can speak of integration in the municipalities, one also still sees more pillarized meetings which create attention for heritage. On the other hand, the presence of civil servants specifically for monuments' care helps explain the observation above that integration does not necessarily mean that heritage is not taken into account<sup>8</sup>. Civil servants specialized in heritage make sure that the topic passes the threshold of attention and shed light on the topic in an integral setting. All municipalities in which a civil servant works on heritage have a high quality of policy considerations, underscoring the point that once attention is paid to the issue quality can be expected.

Third, in a number of municipalities monuments' care did not pass the threshold of attention. Three municipalities discussed their lack of attention to monuments' care and argued there was no need as previous policies were effective and no changes in the future policy on monuments' care was foreseen. Consequently, the municipalities did not deem the issue relevant in their discussions. For example for Renswoude the respondent said: 'It was no major theme for the municipality with important developments' (personal communication,

<sup>&</sup>lt;sup>8</sup> The presence of civil servants specifically for heritage seems to be both related to the size of the municipality and the number of monuments in the municipality.

5 February 2020). Additionally, in Hellendoorn the respondent said 'we had to make choices about what we still do and what we don't. Or to what do we give more attention. And then this [heritage] is not really part of the larger strategy' (personal communication, 11 February 2020). Moreover, in Bergen the respondent argued that little attention had been paid to monuments' care as 'this was already protected in the zoning plan or the regulations so we didn't have a lot of discussions' (personal communication, 7 February 2020). In short, in three municipalities the decision was made to spend limited attention on monuments' care as it was not deemed a question needing attention compared to other issues. This can help explain why in the three municipalities the quality of the policy considerations can also not be regarded as high.

Fourth, in two municipalities, Hollands Kroon and Hillegom, there was attention for monuments' care without them having civil servants specifically for heritage. In both cases attention was drawn to the issue by the involvement of the public. Hollandse Kroon has kept extensive lists showing that various members of the public have raised questions on monuments' care. In Hillegom the respondent for example said that 'The Friends of old Hillegom are very actively involved' (personal communication, 27 February 2020). Additionally, in Alkmaar en Leusden participation was also active in raising attention for the issue (personal communication, 17 February 2020; personal communication 10 February 2020). Consequently, raising attention for monuments' care was not only done by having a civil servant specialized in heritage, but also through public participation.

In short, information relativity was not a problem in 6 out 9 municipalities visited. In Zwolle and Tilburg this can be explained by the presence of a specific civil servant for monuments' care. In Hollands Kroon and Hillegom the active participation on the issue can help explain the attention paid to it. In Alkmaar and Leusden a combination of both a civil servant and active participation help to explain the attention paid to monuments' care. The quality of the policy considerations for monuments' care was, with an exception of Hollands Kroon, also higher than with the three municipalities which paid little attention to the issue. For these municipalities monuments' care was not a relevant issue and they chose to spend more time on other pressing issues. Consequently, the quality of their policy considerations is also not high. Here one can see a negative side of policy integration for monuments' care.

#### **6.2 Benefits of Policy Integration**

In addition to negative consequences of policy integration for the quality of policy considerations found, there are also positive consequences found in the form of synergy and avoiding contradictions. To begin, synergy, the creation of better solutions as a consequence of complementary perspectives, as a result of policy integration can be found with monuments' care in various municipalities. There are different ways in which synergy can be found. In Bergen, Hellendoorn, Hollands Kroon and Rensouwde this expresses itself through simple connections such as between heritage and recreation. For example in Hellendoorn, where little attention was paid to monuments on their own, monuments were considered when talking about recreation. For instance the respondent argued when talking about the role of heritage 'We need to stay attractive and it has a role there' (personal communication, 11 February 2020). Additionally, in Hollands Kroon the theme was also linked to tourism with the respondent saying 'I think a lot of connections were made to the leisure business' (personal communication, 12 February 2020).

Moreover, in Alkmaar, Tilburg and Zwolle heritage was able to integrate truly beyond solely being linked as instrument to another domain such as recreation, but also to be actively woven into discussions with other domains. For example in Tilburg heritage was used to help give shape to the strategy for other spatial domains, with the respondent arguing that 'cultural history is the way we have tried to use to also shape the other themes' (personal communication, 24 February 2020). Consequently, policy considerations for monuments' care can also be found in reference to other spatial domains. In all these municipalities it means that monuments' care was able to connect to other themes present in the environmental strategy, thereby receiving additional attention. In some cases this contributed to some considerations being made regarding monuments' care, such as in Hellendoorn, Renswoude and Bergen, in which the topic on its own was deemed not highly in need of attention. In other cases such as Alkmaar, Tiblurg, Zwolle and Hollands Kroon it simply contributes to the quality of policy considerations by not only seeing monuments' care as an isolated issue but also as an issue with strong ties to other issues

Next, contradictions between monuments' care and other spatial domains are also avoided due to policy integration. However, the avoidance of contradictions was only found to be present in Zwolle, possibly due to the nature of contradictions, which seem more likely to rise in the phase of executing a policy and not the design. In Zwolle the example was given of the historic past and the use of water in it. They recreated an old waterway to restore the historic view, but also used it to replace sewage and increase water storage capacity at the same moment. Consequently, heritage was combined with the other processes but more at the level of the implementation of policy, something which was also underscored by the respondent who argued: 'Possibly heritage is somewhat broader connected to other themes, but if that is due to the environmental strategy, I don't know [...] What is more relevant [for this question] is the level of implementation' (personal communication, 2 March 2020).

In short, synergy was present in 7 out of 9 municipalities and contributed to the policy considerations made. In the case where simple connections were made between monuments' care and other domains, synergy contributed to creating some additional attention for monuments' care. Especially in the case of Hellendoorn, Renswoude and Bergen, where monuments' care was not really discussed on its own, this provided an opportunity to still have some policy considerations. This can help explain why the municipalities still have a certain quality of policy considerations regarding monuments' care, even though they were not specifically focusing on monuments' care. For other municipalities the simple or more complex connection of monuments' care has further contributed to enhancing quality, by for instance being considered as relevant for other domains which take into account heritage in their own work. The avoidance of contradictions was less present and did not necessarily contribute to a better quality of considerations, as it is more suitable to the level of implementation of policies and not clearly present already at the more strategic level of considerations.

#### **6.3 Public Participation**

Next to policy integration, public participation is the other main change introduced by EPA. Public participation can have a number of benefits for the quality of policy considerations, as I already touched upon shortly when discussing information processing. Based on the interviews, public participation with regards to monuments' care was present in Leusden, Hollands Kroon, Alkmaar and Hillegom.

Three benefits of participation for monuments' care were found. First, public participation has helped the quality of the considerations due to the public expressing their

preferences and support for certain policies. By expressing their preferences and support, the consideration of acceptability is not merely an exercise of civil servants, but is truly a reflection of what is acceptable to the broader public. Consequently, the consideration of acceptability is also of higher quality, regardless of what aspects of acceptability are discussed during the public participation. For instance in Hollands Kroon participation was used to determine what citizens found important, giving the municipality a clear overview of what was relevant to take into account when making policy considerations.

Second, public participation has helped the quality of the policy considerations by providing local knowledge which was not available to the civil service. For example in Hillegom a historic association provided information about the state of heritage in the municipality, giving the municipality insight into the current state of the monuments. The respondent said about the historic associations that 'they advise the municipality [...] and have done an assessment of all valuable historic elements' (personal communication, 27 February 2020). As a consequence the municipality was better able to increase the quality of the policy considerations on monuments' care.

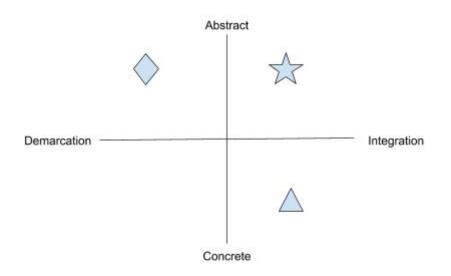
Last, public participation has contributed to the quality of policy considerations by simply putting the issue of monuments' care on the agenda. This was especially the case in Hillegom and Leusden. Both municipalities pointed to the stark public involvement in the issue as one of the reasons why the municipalities made so many policy considerations with regards to monuments' care. In Hillegom this was done by the lobby group Friends of Old Hillegom which staunchly participated in all sessions, making sure someone was always present in sessions discussing the environmental strategy. In Leusden citizens brought it up during participatory sessions. The respondent argued that monuments' care was discussed in the environmental strategy because 'a part of the participants explicitly asked attention for this issue, which has worked as a form of agenda-setting' (personal communication, 10 February 2020). Consequently, participation also helped put the issue on the agenda, a point interrelated with why monuments' care passed the threshold of attention.

To summarize, in four municipalities public participation has also contributed to the quality of the policy considerations. First, participation has contributed to the quality of the consideration of acceptability, as the public explicitly offered input on what they deemed

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acceptable, instead of civil servants determining the preferences of the public. Second, local knowledge gave additional insight regarding monuments' care making better considerations possible. Last, participation has contributed by simply putting the issue on the agenda, so that municipalities were forced to make considerations regarding monuments.

The nature of participation for integrated strategy documents calls for some attention. In the interviews almost all municipalities signaled that participation was difficult and demanded creativity when talking about an integrated strategy document, as strategies contain long-term more abstract questions on spatial themes. For participation especially the question of abstraction was seen as challenging, as most citizens remain at a more concrete level of participation (e.g. personal communication, 11 February, 17 February, 24 February ). Abstract questions request input from participants that goes beyond specific individual situations and demand a more conceptual understanding of the spatial questions faced by a municipality. Unfortunately, this is unrealistic to assume from even the most involved citizens. Consequently, one faces the problem of participation for integrated strategy documents in which participation is possible at a different level of abstraction than necessary. This can be illustrated by figure 6.1



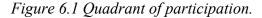


Figure 6.1 shows three things. First, environmental strategies and the participation necessary belong to the upper right corner marked with a star. Here participation reaches an abstract and integrated level necessary for environmental strategies. Second, before environmental strategies, departments were more focused on the upper left corner marked

with a rhombus, with demarcated but abstract challenges they needed to solve. Last, participation of citizens is often in the lower right corner, marked with a triangle, in which citizens' input is both integrated and concrete. Consequently, there is a discrepancy between participation input and expectations by civil servants. On the one hand, for environmental strategies abstract integrated participation is needed while on the other hand, participation is often more concrete integrated.

#### **6.4 Interconnectedness**

In section 3.6 I already argued that the concepts of policy integration and public participation would most likely be intertwined, although not knowing the exact nature of this interconnectedness. Based on the results of the interview, I want to return to this point and shed some light on the interconnectedness between information processing and synergy, as part of policy integration, and public participation.

First, information processing and synergy cannot be regarded as two completely separated processes. On the one hand, synergy is less likely to take place if information does not manage to pass the threshold of information. As one can see from the results even when synergy takes place for monuments' care, it is only in a simplified form in which the issue is discussed as part of another issue and not as a relevant theme on its own. Therefore, if one does not pay attention to the issue, chances are that synergy will also not take place. At the same time if one does pay attention to the issue, synergy is more likely to occur. On the other hand, information is more likely to pass some threshold of attention due to synergy. From the results it becomes clear that due to synergy some attention has been paid to monuments' care in municipalities in which the issue on its own does not pass the threshold of attention. Although the push from being connected to another spatial domain does not grant as many policy considerations for monuments' care as one might desire, it still helps to create some considerations. Consequently, although synergy does not seem to be able to fully raise the issue to attention, it does have a positive effect on the amount of attention allotted.

Second, information processing and public participation also cannot be regarded as two completely separate processes. On the one hand, once an issue has passed the threshold of attention in a municipality, civil servants might explicitly use the theme in participatory settings, generating the benefits of participation. This can be illustrated by for example Alkmaar, where the issue was deemed relevant internally and consequently was both used to have separate discussions with heritage organizations and to use it as one of the themes in participatory setting (personal communication, 17 February 2020). On the other hand, public participation might help push the issue past the threshold of attention of civil servants. As the public helps shape the agenda during the participatory settings, the focus of the public on monuments' care can help raise attention to the issue. Both also work the other way around, as a lack of attention might lead to the issue not being on the agenda for participatory settings or a lack of interest from the public might lead the municipality not to pursue the issue any further. Consequently, participation and information processing might both be a positive and a negative influence on each other.

Third, synergy and participation can also not be regarded as separate processes. First, partially this is through information processing in which both synergy and participation might be of influence and therefore of influence on each other. Second, partially this is because citizens in participatory settings do not restrict themselves to specific spatial domains but cross-over, thereby connecting different domains. Participation can help to make crossovers between policy domains and stimulate synergy in the process of policy considerations. Third, synergy between civil servants can lead to broader participatory settings in which citizens are asked to reflect beyond the boundaries of limited themes, thereby also giving room for participation on monuments' care without citizens in the first instance attending for this issue. Therefore, synergy and participation might have both influence on each other and help to create better policy considerations

To summarize, the interconnectedness between information processing, synergy and public participation is manifold and the interrelation between the three processes should be taken into account when trying to understand the quality of policy considerations made based on these three processes. The complete interrelation based on the findings in the interviews is summarized in figure 6.2

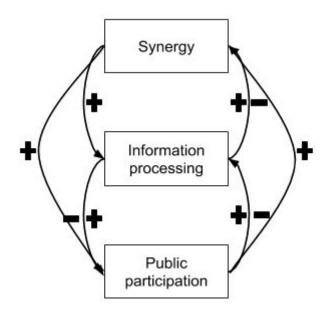


Figure 6.2 Interconnectedness of synergy, information processing and public participation.

#### 6.5 Overview

Policy integration and public participation both influenced the quality of the policy considerations in the visited municipalities. First, participation had a positive effect on the quality of policy considerations in four municipalities by making clear what is acceptable to citizens, by generating additional local knowledge which helps to refine the considerations and by simply putting the issue of monuments' care on the agenda. Participation for environmental strategies is challenging due to abstract integrated nature, which can be understood and tackled using the participation quadrant as seen in figure 6.1

Second, information processing only had a negative effect on the considerations in three municipalities, where the issue was almost completely skipped in the discussion. In the other municipalities information processing was not a problem as civil servants or public participation managed to help the issue pass the threshold of attention.

Third, synergy first had a positive effect in the three municipalities where monuments' care did not pass the threshold of attention, as still some considerations were given to monuments' care in relation to topics it was connected to in the environmental strategy. Second, synergy also had a positive effect on four municipalities where the issue was already receiving attention by integrating it with other spatial domains and giving additional considerations to the issue. Last, the concepts of information processing, synergy and public participation are all intertwined and can affect the other concepts in both positive and negative ways. Consequently, policy integration and public participation cannot be regarded as two separate processes, but must be understood as two processes which influence each other and should be taken into account when talking about the relevance of one of the two for the EPA.

#### 7 Conclusion & Discussion

In this final section, first an answer to the main question of this research is offered, using an overview of the results. Second, the implications of the findings for monuments' care under the EPA are discussed. Third, the limitations of the research are addressed. Last, I offer a number of recommendations, both for further research and for the development of future environmental strategies and the place of monuments' care in the environmental strategy.

#### 7.1 Overview

The goal of this thesis is to determine the quality of policy considerations that is delivered for monuments' care in the environmental strategies of Dutch municipalities, and whether policy integration and public participation have played a part in this. The new environment and planning act (EPA) introduced the instrument of the environmental strategy, which describes the direction of future spatial development of a certain territory. The introduction of an integrated new spatial instrument creates questions of quality, especially for those spatial domains which are not at the forefront of interest, such as monuments' care. However, quality in an environmental strategy is not easily determined, as environmental strategies contain policy considerations instead of full-fledged policies, on which quality indicators are usually focused on. In addition to the challenge of determining the quality of considerations for monuments' care, one should also try to understand the influence of the EPA by studying the consequences of the two major changes introduced by the EPA: policy integration and public participation. The combined question of what quality of considerations for monuments' care can be found in environmental strategies and what role the two major changes of the EPA have played in shaping this quality has led to the main question of this research: What is the quality of policy considerations for monuments' care in environmental strategies of Dutch municipalities and have policy integration or public participation contributed to the quality found?

To begin answering the main question I identified three dimensions relevant for determining the quality of policy considerations: acceptability, legality and reachability. Although usually four dimensions are used to judge the quality of a policy, the dimension of effectiveness was not included as a relevant dimension in the case of policy considerations for two reasons. First, the dimension of effectiveness is focused on whether interventions, solutions or alterations to reach a desired state or to solve a perceived problem work. However, in the case of policy considerations the focus is not on solutions or interventions, but on the previous phase of policy design in which the desired state or perceived problems are identified. Second, if one questions whether the policy considerations are effective, one turns to the usage of policy considerations as fundament for subsequent phases of policy making, thereby questioning whether the policy considerations do work as a basis for the following phase of policy making. Policy considerations can only serve as an effective basis for the subsequent phases of policy making if the relevant problems and desired outcomes are made clear, which is done through considerations of legality, acceptability and reachability. Therefore, the effectiveness of policy considerations is a reflection of the presence of the dimensions of legality, acceptability and reachability. Consequently, effectiveness is not a self-standing dimension to judge the quality of policy considerations, as it is not a suitable dimension on its own. This is because it focuses on solutions and interventions not present with policy considerations and because the effectiveness of the policy considerations as a whole are a direct reflection of the other three dimensions of policy quality.

Second, once it was clear what aspects together shaped the quality of policy considerations in the environmental strategies of the municipalities, I turned to determining the quality using a content analysis. I argued that for the three policy considerations of legality, acceptability and reachability, seven different dimensions were relevant. Municipalities taking into account all seven different dimensions could be regarded as having a high quality, municipalities taking into account six or five dimensions could be regarded as having a moderate quality, while municipalities taking into account not more than four dimensions were regarded as having a low quality of policy considerations for monuments' care. Five out of thirty-three municipalities had a high quality of considerations, taking into account all seven aspects of the three different considerations. Thirteen municipalities had a moderate quality of considerations, taking into account five or six aspects of the three considerations. Fifteen municipalities could be considered to have a low quality of policy considerations regarding monuments' care, taking into account not more than four aspects of the three considerations. Third, based on the interviews in nine municipalities I determined that the policy considerations of municipalities were broader than the considerations put to paper in the environmental strategies. During the interviews it became apparent that all municipalities had additional considerations, ranging from references to the continuation of already existing strategies for monuments' care, to expansive considerations regarding the place of monuments' care in the identity of municipalities. Consequently, although the quality of considerations in many municipalities cannot be regarded as high, one can be assured that always additional considerations exist, which might have their reflection in future environmental plans and programmes.

Fourth, turning to the main changes of EPA, policy integration and public participation, information processing as a consequence of policy integration had a negative impact on the quality of the policy considerations in three of the nine municipalities. In these municipalities the issue of monuments' care did not manage to pass the threshold of attention and few considerations were made with regards to monuments' care. In the other six municipalities monuments' care passed the threshold of attention due to either civil servants focusing on the issue, or public participation or a combination of both. Synergy as a consequence of integration was beneficial for the quality of policy considerations in two ways. First, in municipalities where the issue did not manage to pass the threshold of attention it helped to create some attention for monuments' care in relation to for instance recreation or tourism, consequently generating some considerations for monuments' care. Second, in municipalities where monuments' care already passed the threshold of attention, the issue was linked to various other spatial domains, such as the identity and livability of the city, generating additional considerations and increasing the quality. Public participation was beneficial in four municipalities for the quality of considerations for monuments' care in three ways. First, by clarifying questions of acceptability. Second, the input of local knowledge made a higher quality of considerations possible. Third, participation was beneficial for monuments' care simply because it helped put the issue on the agenda.

To return to the main question of this research '*What is the quality of policy* considerations for monuments' care in environmental strategies of Dutch municipalities and have policy integration or public participation contributed to the quality found?' one can now formulate an answer in three steps. First, the quality of considerations on monuments' care present in environmental strategies is rather mixed, with fifteen municipalities having a low quality, thirteen having a moderate quality and five having a high quality. Second, one can nuance this rather bleak conclusion on the quality of policy considerations, as the results of the interviews show that municipalities always have additional considerations. Third, policy integration has negative effects in the form of information processing in a number of municipalities, while also having positive effects in the form of synergy that counteract part of the negative effects of information processing and increase the quality of considerations. In addition, public participation also has a positive effect in a number of municipalities, increasing the quality of considerations due to shedding light on what is acceptable to citizens, generating local knowledge and setting the issue on the agenda.

#### 7.2 Implications

The findings carry along three main implications for the functioning of the instrument environmental strategy and for the EPA in general. First, it was assumed by some that it was 'unthinkable that heritage is not part of the environmental strategy' due to the strong connection with the environmental plan and the legal demand for a description of the spatial quality of a territory (Ros & Zomer, 2018 p. 13). The findings of this thesis show that this 'unthinkable' scenario in fact is reality for a number of municipalities. Therefore, the idea that monuments' care's place in environmental strategies is ensured due to lay-out of the EPA and the legal demands carried along, should be rejected. Consequently, the presence of monuments' care in environmental strategies cannot be taken for granted, and attention should be drawn to the issue in additional ways to ensure its inclusion in environmental strategies.

Second, when the quality of the policy considerations is not high for monuments' care, as is the case for 28 out of 33 municipalities, the goal of the environmental strategy to offer an overview of the different spatial qualities in a territory, identify current problems, and describe desired spatial development is undermined. When I argued that effectiveness in itself was not useful to judge the quality of policy considerations due to its focus on the question 'does it work?', focusing on interventions and solutions, I also argued that effectiveness was instead reflected in the presence of the other three considerations. As effectiveness is focused on the question whether something works, the environmental strategy is effective only if it does what it is supposed to do: offering an overview of the problems, qualities and desired developments. As the results of this research show, only in a handful of municipalities the considerations of acceptability, legality and reachability were fully taken into account in the environmental strategies, and therefore in most municipalities the environmental strategy cannot be considered effective for the subsequent phases of policy making under the EPA.

Third, the fact that in many municipalities the environmental strategies are not effective in providing an overview of the spatial qualities, existing problems and desired spatial outcomes for monuments' care, influences the place of monuments' care in the environmental plan. The environmental plan encompasses the rules and regulations through which one deals with the spatial qualities described and the problems identified. Additionally, the plan includes measurements to realize the desired spatial outcomes, which were described in the environmental strategy. If the environmental strategy fails to offer this input for the environmental plan, it becomes questionable whether the quality of the environmental plan for monuments' care will be high. If a direction for the future development of monuments' care is absent in the strategy, the plan is not likely to address the future development. Although it is certainly likely that the plan retains the existing status quo, no appropriate steps are likely to be taken for the development of monuments' care in a territory, as no such ideas for the development exist. Consequently, the environmental plan will also not serve as guidance to stimulate spatial quality and development, as the input for the plan in the environmental strategy is also missing.

In short, environmental strategies, in contrast to the expectations of some, do not necessarily include considerations for monuments' care. This undermines the effectiveness of environmental strategies, as strategies are unable to describe the current spatial qualities, problems and desired spatial outcomes without considering the legality, acceptability and reachability fully. As a consequence, the environmental plan, which is supposed to be relying heavily on the input provided in the environmental strategy, might also lack quality for monuments' care. Whether this is the case can only be determined once the EPA fully comes into force in 2029. However, based on the results of this research, certainly some doubts can

be cast on the future protection and development of monuments' care provided through the instruments of the EPA.

#### 7.3 Limitations

Every research has limitations, and for this research I want to focus on three. To begin, the generalizability of the research is limited as part of the results have been acquired using in-depth interviews. The benefit of interviews is that it helps to uncover the complex relation between processes, as was desired here, but at the same time the generalizability of the outcome is limited. Consequently, one needs to be careful in stating that the findings here are applicable to all municipalities in the Netherlands. Although one can be relatively sure that the findings are not unique and not isolated to the nine municipalities, how applicable they are to other municipalities is far from clear.

Moreover, in the research a process of coding was used to determine quality of considerations. On the one hand this assures a clear reproducible measurement of when an environmental strategy contains a certain quality. On the other hand, codes do not fully capture the essence of quality. Whereas one municipality might only take into account five of the seven aspects necessary for full quality, it might do so very well and apply them thoroughly, while a municipality taking into account all seven aspects might apply them in a less thorough way. Here lies an inherent problem if one tries to compare and grasp quality beyond one municipality. Every municipality has a unique quality in their own environmental strategies, which in its deepest essence is difficult to compare to other municipalities. At the same time, comparison is necessary to have at least some way to describe and understand the content of environmental strategies. Consequently, although the coding and the categorization of quality is necessary to make any comparison possible, real quality cannot be captured truly by qualification of aspects but is unique to every municipality. Therefore, the results presented are flawed in the sense that municipalities might have a quality in their environmental strategies which is truly their own, but not comparable to others, nor easily measured.

Last, experiences of space and place reach far beyond what can be captured in documents. As interpretations of the quality of place and space are always subjective to how the space is interpreted and experienced, one can never truly know what the role and place of

monuments' care is in the spatial domain. Monuments are not roads which are facts of life, but are valuable by the fact that they are places imbued with experiences and identity. This makes it highly complex to truly assign a judgement of quality to descriptions of monuments, as these descriptions in themselves will never be able to capture the essence and meaning of a monument to different people. Consequently, any judgement of quality in the end comes down not to how space and place are experienced, which is core to monuments, but to how well monuments' care is accounted for in terms of physical space and development. Therefore, any judgement passed in a document or by a standard of quality is by default lacking, as the quality of a monument cannot be generalized nor captured beyond shared experience and identity which is unique to every different place.

#### 7.4 Recommendations

To conclude this thesis I want to offer four recommendations. First of all, future research might focus on the relation between the quality of the environmental strategy and the environmental plan. Here I have presented only the quality of environmental strategies. However, whether the quality of the environmental strategy is in fact an indication of the quality of the environmental plan, which is so crucial for appropriate protection of monuments, remains unclear. Some municipalities might have great aspirations and thereby considerations, but cannot live up to the promises made in the strategy once they start developing the plan. Others might have a low quality of policy considerations in their environmental strategies, while having a high policy quality in the environmental plans. Further research might be focused on uncovering whether the relation desired by the Environment and Planning Act is actually in place and therefore whether the quality of the environmental plan or not.

Second, the use of the quadrant for participation, as shown in figure 6.1, can be beneficial in realizing useful participation. For policymakers the quadrant can help to set-up modes of public participation that are aligned with the goals of integrated and abstract strategy documents. By realising that there is a discrepancy between public participation, which is often concrete and integrated shown by the triangle, and strategy documents, which are abstract and integrated shown by the star, policymakers can try to find modes of participation that link the two separate situations. On the one hand, this can be done by

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attempting to cut-down abstract issues into more concrete questions, which can serve as indicators for policymakers about the preferences of citizens. On the other hand, policymakers might create more intensive participatory settings in which experts actively inform the public about the questions faced, so that they can make more informed decisions.

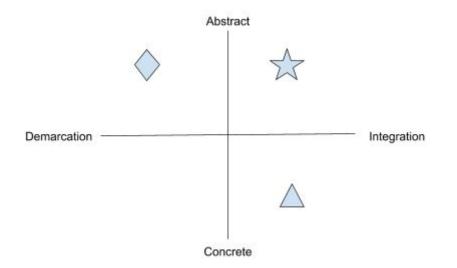


Figure 6.1 Quadrant of participation.

Additionally, using the quadrant of participation in figure 6.1, researchers might actively focus on the question whether the participation studied in fact matches the desired outcome of that same participation. Although the quadrant is a simplification of reality, it does help to understand what basic forms of participation can help to achieve certain outcomes and whether the desired outcome of this participation is in fact reachable. This is not to say participation is in essence limited to certain outcomes, but to underline that participation without guidance cannot simply bring abstract results. Without pretending to have a full grasp of many of the collaborative initiatives, I would argue that various forms of participation might benefit from taking into account the idea of the quadrant. For instance, with large deliberative projects such as the G1000 the initial goals that focused on abstract integrated questions are poorly reflected by the actual output of the deliberative setting. In addition, for example for questions of co-creation researchers must question whether the demands of co-creation are not located in the upper left corner, marked with a rhombus, while actual participation mostly is focused in the lower right corner. Evidently, there are ways to remedy the problem of incongruence between expectation and reality of participation, but I want to underline that for researchers it is important to take it into account when studying participation.

Third, the three considerations that together comprise policy quality can help municipalities to test, but also to guide, their own considerations with regard to monuments' care. For this the municipalities can use the seven aspects of the three considerations, as again summarized below in table 5.3. Using the seven aspects, municipalities can determine whether their considerations have met a certain standard of quality to ensure that monuments' care is also taken into account in environmental strategies.

Considerations	Aspect
Acceptability	Desired Use
	Desired Influence
	Desired State
Reachability	Practicability
	Relevant Actors
Legality	Description of place
	Description of space

Table 5.3 Policy considerations and their aspects.

One has to be careful with one-on-one applying the aspects to other policy domains. On the one hand, this is simply because I have developed aspects for monuments' care and not for other policy fields. On the other hand, although for most spatial domains the seven aspects should be applicable, it is not to say whether additional aspects might be relevant, and whether the way I posed the aspects are also relevant in other spatial domains. Consequently, future research might use the framework to judge the quality of policy considerations in other policy areas. By doing so on the one hand the three relevant considerations I identified might be sharpened and expanded, by applying the three considerations to other policy questions. On the other hand, it might underscore, or undermine, the usefulness of the concepts proposed here, which in turn increases the knowledge we have on policy considerations. Consequently, this might help to create attention for the question of policy considerations, on which little research exists, while considerations are central in shaping more full-fledged policies and therefore, I believe, should be better understood and measured.

Last, the most important advice I would want to offer for the place of monuments' care in the development of environmental strategies is simple: make sure its development is on the agenda. On the one hand, this means that paying attention to monuments' care actively in any way already ensures that most of the considerations necessary for a high quality are taken into account. In the municipalities I visited, all municipalities who paid attention to the theme actively did so in very different ways, but the simple fact that it was on the agenda individually in some way ensured a high quality of policy considerations for monuments' care. On the other hand, making sure its development is on the agenda means paying attention to the future and not the past. Many municipalities embed the presence of monuments' implicitly or explicitly in stories about the historic development of their municipality. Although this ensures that monuments' care is included in some way in the environmental strategy, it does not offer specific attention to monuments' care and more importantly, it shifts the focus to historic instead of future development. The environmental strategy is *the* place for municipalities to lay-out their plans for the future development of the future.

### References

Aan de slag met de Omgevingswet (n.d.a) *Samenhang instrumenten*. Retrieved 9 January 2020, from https://aandeslagmetdeomgevingswet.nl/regelgeving/instrumenten/samenhang-instrumenten/

Aan de slag met de Omgevingswet (n.d.b) *Gemeentelijke omgevingsvisie*. Retrieved 9 January 2020, from https://aandeslagmetdeomgevingswet.nl/regelgeving/instrumenten/omgevingsvisie-gemeente/

Allison, G. (1969) 'Conceptual Models and the Cuban Missile Crisis', *American Political Science Review*, (63), 3 blz. 689-718

Allison, G., Zelikow, P. (1999) *Essence of Decision. Explaining the Cuban Missile Crisis*, New York: Longman.

Ansell, C., & Gash, A. (2008). Collaborative governance in theory and practice. *Journal of public administration research and theory*, *18*(4), 543-571.

Ansell, Christopher K. (2011) *Pragmatist Democracy. Evolutionary Learning as Public Philosophy*. Oxford: Oxford University Press.

Bakvis, H. & Juillet, L. (2004) *The Horizontal Challenge: Line Departments, Central Agencies and Leadership.* Ottawa: Canada School of Public Services. Retrieved October 27 2019, from http://publications.gc.ca/collections/Collection/SC103-1-2004E.pdf

Berndsen, R., Fraanje, R., Korsten, A. & Kort, M. (2007) Beoordeling van provinciale bestuurskracht. Een bestuurskrachtmeting bezien: kenmerken, aanpak, reflectie. *Bestuurswetenschappen 61(6), 11-48* 

Binnenlands Bestuur (n.d.) *Dossier Omgevingswet*. Retrieved 11th of March 2020, from https://www.binnenlandsbestuur.nl/Omgevingswet

Bondarouk, E., & Mastenbroek, E. (2018). Reconsidering EU Compliance: Implementation performance in the field of environmental policy. Environmental Policy and Governance, 28(1), 15-27.

Cairney, P (2020) Understanding public policy: Theory and Issues. Hampshire: Palgrave 2nd edition.

Candel, J. J., & Biesbroek, R. (2016). Toward a processual understanding of policy integration. *Policy Sciences*, 49(3), 211-231.

CBS (n.d.) *Bevolking; kerncijfers*. Retrieved 17th of March 2020, from https://opendata.cbs.nl/statline/#/CBS/nl/navigatieScherm/thema?themaNr=26260

Christensen, T., & Lægreid, P. (2007). The whole-of-government approach to public sector reform. *Public administration review*, *67*(6), 1059-1066.

Cohen, J., & Sabel, C. (1997). Directly-Deliberative Polyarchy. *European Law Journal*, 3(4), 313-342. doi:10.1111/1468-0386.00034

Creswell, J. (2013). *Qualitative Inquiry & Research Design: Choosing Among Five Approaches*. London: Sage Publications (3rd Edition)

Doorewaard, H., & Verschuren, P. (2007). Het ontwerpen van een onderzoek. Den Haag: Boom.

Dubé, L., Addy, N. A., Blouin, C., & Drager, N. (2014). From policy coherence to 21st century convergence: a whole-of-society paradigm of human and economic development. *Annals of the New York Academy of Sciences*, *1331*(1), 201-215.

Environment and Planning Act (2016) *Staatsblad 2016 (156)* Retrieved, 11 January 2020, from https://zoek.officielebekendmakingen.nl/stb-2016-156.html

Fung, A., & Wright, E. O. (2001). Deepening Democracy: Innovations in Empowered Participatory Governance. *Politics & Society*, *29*(1), 5-41. doi:10.1177/0032329201029001002

Gemeente Aa en Hunze (2019) *Omgevingsvisie Centrum Gieten*. Retrieved 24th of February 2020, from

https://www.aaenhunze.nl/Inwoners\_verenigingen/Wonen\_en\_ver\_bouwen/Bestemmingsplannen/Vas tgesteld/Vaststelling\_Omgevingsvisie\_Centrum\_Gieten

Gemeente Alkmaar (2017) *Omgevingsvisie*. Retrieved 6th of February 2020, from https://alkmaar.raadsinformatie.nl/document/5782852/1#search=%22omgevingsvisie%22

Gemeente Alkmaar (n.d.) *Datalab Alkmaar*. Retrieved 22nd of March 2020, from https://datalab.alkmaar.nl/Monumenten/

Gemeente Almere (2017) Omgevingsvisie Almere. Retrieved 24th of February 2020, from

Gemeente Arnhem (2018) Reader Omgevingswet, Omgevingsvisie en Gemeenteraad. Retrieved 11 January 2020, from

https://www.google.com/search?rlz=1C1GCEA\_enNL885&biw=1680&bih=939&sxsrf=ACYBGNS-ETle6shgQJSu1yBxNMYWfIGrFw%3A1579695991078&ei=dz8oXsWqBIa8kwWw\_bzgAw&q=+R eader+Omgevingswet%2C+Omgevingsvisie+en+Gemeenteraad&oq=+Reader+Omgevingswet%2C+ Omgevingsvisie+en+Gemeenteraad&gs\_l=psy-ab.3..33i160.101076.101076.101410...2.0..094.198.3. ....0...2j1..gws-wiz......35i39.jTnVAgorA00&ved=0ahUKEwiFwpqTmpfnAhUG3qQKHbA-Dzw4C hDh1QMICw&uact=5

Gemeente Bergen (2019) *Omgevingsvisie Bergen 2030*. Retrieved 6th of February 2020, from https://www.bergen.nl/de-gemeente/omgevingsvisie-bergen-2030\_45578/item/downloaden-omgeving svisie-bergen-2030\_37153.html

Gemeente Bladel (2017) *Omgevingsvisie*. Retrieved 24th of February 2020, from https://decentrale.regelgeving.overheid.nl/cvdr/XHTMLoutput/Actueel/Bladel/CVDR602513.html

Gemeente Elburg (2018) *Omgevingsvisie Elburg*. Retrieved 24th of February 202, from http://www.broplan.nl/OV\_Elburg/

Gemeente Groningen (2018) *Omgevingsvisie voor de stad Groningen*. Retrieved 24th of February 2020, from https://gemeente.groningen.nl/omgevingsvisie-voor-de-stad-groningen

Gemeente Hellendoorn (2014) *Omgevingsvisie*. Retrieved 6th of February 2020, from https://www.hellendoorn.nl/politiek-gemeente/publicatie/omgevingsvisie

Gemeente Hillegom (2018) *Omgevingsvisie Hillegom*. Retrieved 6th of February 2020, from https://hillegom.nl/omgevingsvisie.html

Gemeente Hillegom (n.d.) *Gemeentelijke Monumenten*. Retrieved 17th of March 2020, from https://hillegom.nl/monumenten.html

Gemeente Hollands Kroon (2016) *Omgevingsvisie*. Retrieved 6th of February 2020, from, http://www.bestm.nl/PDF/OMGEVINGSVISIE/Bijlage%201a%20-%20Deel%20I-II-II%20-%20Om gevingsvisie%20VG.pdf

Gemeente Katwijk (2018) *Omgevingswet in Katwijk*. Retrieved 24th of February 2020, from https://extra.katwijk.nl/gemeente-en-burgerzaken/participatie/omgevingswet-katwijk

Gemeente Leusden (2018) *Omgevingsvisies*. Retrieved 6th of February 2020, from https://www.leusden.nl/bouwen-en-wonen/omgevingsvisies.html

Gemeente Noordenveld (2017) *Omgevingsvisie Noordenveld 2030*. Retrieved 24th of February 2020, from https://www.gemeentenoordenveld.nl/ruimtelijkeplannen/NL.IMRO.1699.2014SVG001-vg01/

Gemeente Nunspeet (2018) *Omgevingsvisie*. Retrieved 24th of February 2020, from https://www.nunspeet.nl/over-nunspeet/omgevingsvisie

Gemeente Oirschot (2017) *Omgevingsvisie*. Retrieved 24th of February 2020, from https://simsite.oirschot.nl/inwoners-oud/omgevingsvisie\_45387/

Gemeente Oisterwijk (2016) *Omgevingsvisie Oisterwijk*. Retrieved 24th of February 202, from https://omgevingsvisie-oisterwijk.nl/#/wat-is-een-omgevingsvisie

Gemeente Oldambt (2017) *Omgevingsvisie*. Retrieved 24th of February, from https://www.gemeente-oldambt.nl/in-oldambt/omgevingswet/omgevingsvisie

Gemeente Oldebroek (2018) *Omgevingsvisie Oldebroek*. Retrieved 24th of February 2020, from https://www.oldebroek.nl/Bestuur\_en\_organisatie/Verordeningen\_en\_beleid/Beleidsbibliotheek/Omg evingsvisie\_Oldebroek

Gemeente Ommen (2012) Gemeentelijke omgevingsplan Ommen. Retrieved 24th of February 2020, from

https://www.ommen.nl/inwoners/bouwen-en-verbouwen/index.php?eID=tx\_securedownloads&p=332 2&u=0&g=0&t=1585748979&hash=a4d48e25d489cd0c3288ae304cb8243e88979933&file=/fileadmi n/Documenten\_Ommen/Wonen\_en\_leven/Ruimtelijke\_plannen/Gemeentelijk\_Omgevingsplan/Geme entelijk\_Omgevingsplan\_Ommen.pdf Gemeente Opsterland (2015) *Omgevingsvisie 2015-2030*. Retrieved 24th of February 2020, from https://www.opsterland.nl/dsresource?objectid=deb305fc-1e93-461f-9f4b-09d3b1254499&type=org

Gemeente Renswoude (2018) *Omgevingsvisie Renswoude* 2018-2030. Retrieved 6th of February 2020, from https://www.renswoude.nl/bestuur-organisatie/omgevingsvisie-renswoude-2018-2030 41744/

Gemeente Renswoude (n.d.) *Gemeentelijke monumenten*. Retrieved 22nd of March 2020, from https://www.renswoude.nl/in-de-gemeente/monumenten\_41684/item/gemeentelijke-monumenten\_362 08.html

Gemeente Reusel-De Mierden (2018) *Omgevingsvisie*. Retrieved 24th of February 2020, from https://www.reuseldemierden.nl/inwoners-en-ondernemers/omgevingsvisie\_42900/

Gemeente Ridderkerk (2017) *Omgevingsvisie*. Retrieved 24th of February 2020, from https://www.ridderkerk.nl/omgevingsvisie

Gemeente Sittard-Geleen (2016) *Omgevingsvisie Sittard-Geleen 2016*. Retrieved 24th of February 2020, from https://www.sittard-geleen.nl/Bestuur/Beleid/Visie\_en\_beleid/Omgevingsvisie\_2016

Gemeente Staphorst (2018) *Staphorst voor elkaar*. Retrieved 24th of February 2020, from https://www.staphorst.nl/document.php?m=33&fileid=146749&f=bdb0024e2d978321a57b221f3ff84f df&attachment=0&c=159535

Gemeente Steenwijkerland (2017) *Omgevingsvisie Steenwijkerland*. Retrieved 24th of February, from https://www.steenwijkerland.nl/Inwoners/bouwen\_en\_wonen/Omgevingswet/Omgevingsvisie/Omgevingsvisie/Steenwijkerland

Gemeente Tilburg (2015) *Omgevingsvisie Tilburg 2040*. Retrieved 6th of February 2020, from https://www.ruimtelijkeplannen.nl/documents/NL.IMRO.0855.STV2015001-d001/d\_NL.IMRO.0855. STV2015001-d001.pdf

Gemeente Uden (2015) *Omgevingsvisie Uden 2015*. Retrieved 24th February 2020, from https://www.uden.nl/data/downloadables/3/4/8/9/omgevingsvisie-uden-2015.pdf

Gemeente Voerendaal (2016) *Omgevingsvisie Voerendaal*. Retrieved 24th of February 2020, from https://ruimtelijkeplannen.voerendaal.nl/NL.IMRO.0986.SVomgevingsvisie-VA01/t\_NL.IMRO.0986. SVomgevingsvisie-VA01/t\_NL.IMRO.0986.

Gemeente Voorst (2017) *Toekomstvisie*. Retrieved 24th of February 2020, from https://www.voorst.nl/fileadmin/user\_upload/Bestuur\_organisatie/Beleid\_en\_regelgeving/1.\_Bouwe nd\_Voorst/Ruimtelijke\_Toekomstvisie.pdf

Gemeente Waterland (2017) *Omgevingsvisie Waterland 2030*. Retrieved 24th of February 2020, from https://www.waterland.nl/omgevingsvisie-waterland-2030

Gemeente Westvoorne (2016) *Omgevingsvisie Westvoorne 2030*. Retrieved 24th of February 2020, from https://www.westvoorne.nl/grondgebied/omgevingsvisie-westvoorne-2030\_43733/

Gemeente Zwolle (2017) *Omgevingsvisie deel 1*. Retrieved 6th of February 2020, from https://www.zwolle.nl/omgevingsvisie

Gerring, John (2008): "Case Selection for Case-Study Analysis: Qualitative and Quantitative Techniques", in Box-Steffensmeier, Janet F., Henry E. Brady, and David Collier, Eds. *The Oxford Handbook of Political Methodology*. Oxford: Oxford University Press (Chapter 28: pp. 645-684)

Gottweis, Herbert. "Argumentative policy analysis." *Handbook of public policy* (2006): 461-479.

Groothuijse, F. (2016) Omgevingswaarden: waardevol? *Tijdschrift voor Omgevingsrecht*, .. (4) 104-109,doi: 10.5553/TO/156850122016016004004

Healey, P (2011) *Civic Capacity, Progressive Localism and the Role of Planning.* RTPI Nathaniel Lichfield Annual Lecture. Retrieved 14th of January 2020, from https://www.researchgate.net/publication/233869978\_Civic\_Capacity\_progressive\_localism\_and\_the \_role\_of\_planning

Hemerijck, A. & Hazeu, C. (2004) Werkt het, past het, mag het en hoort het? De kernvragen van beleidsvorming toegepast op milieubeleid *Bestuurskunde 13(2), 55-65* 

Hemerijck, A. (2003). Vier kernvragen van beleid. Beleid En Maatschappij, 30(1), 3-19.

Historie Leusden (n.d.) *Monumenten in de gemeente Leusden*. Retrieved 22nd of March 2020, from https://www.historieleusden.nl/monumenten.html

Hoogerwerf, A. & Herweijer, M. (red.) (2014). *Overheidsbeleid. Een inleiding in de beleidswetenschap.* Negende, geheel herziene druk. Alphen aan den Rijn: Kluwer.

Howlett, M., Ramesh M. & Perl A. (2009) Studying Public Policy. Oxford University Press: Toronto.

Innes, J. E., & Booher, D. E. (2004). Reframing public participation: strategies for the 21st century. *Planning theory & practice*, *5*(4), 419-436.

Jochim, A. E., & May, P. J. (2010). Beyond subsystems: Policy regimes and governance. *Policy Studies Journal*, *38*(2), 303-327.

Jones, B. D., & Baumgartner, F. R. (2005). *The politics of attention: How government prioritizes problems*. University of Chicago Press.

Jones, J., & Barry, M. M. (2011). Developing a scale to measure synergy in health promotion partnerships. Global Health Promotion, 18(2), 36-44.

Korsten, A. (n.d.) *Maatstaven voor de beoordeling van overheidshandelen*. Retrieved 11 January 2020, from

http://www.arnokorsten.nl/PDF/Bestuurskunde/Maatstaven%20voor%20de%20beoordeling.pdf

March, J. G., & Olson, J. P. (1983). Organizing political life: What administrative reorganization tells us about government. *American Political Science Review*, 77(2), 281-296.

Mattoo, A., & Singh, H. V. (1994). Eco-labelling: policy considerations. Kyklos, 47(1), 53-65.

May, P. J., Jochim, A. E., & Sapotichne, J. (2011). Constructing homeland security: An anemic policy regime. *Policy Studies Journal*, *39*(2), 285-307.

May, P. J., Workman, S., & Jones, B. D. (2008). Organizing attention: Responses of the bureaucracy to agenda disruption. *Journal of Public Administration Research and Theory*, *18*(4), 517-541.

Ministerie van Binnenlandse Zaken en Koninkrijksrelaties (n.d.) *Omgevingswet*. Retrieved 18 January 2020, from https://www.omgevingswetportaal.nl/wet-en-regelgeving/wet

Ministerie van Binnenlandse Zaken en Koninkrijksrelaties (n.d.b) *AMvBs*. Retrieved 12 January 2020, from https://www.omgevingswetportaal.nl/wet-en-regelgeving/amvbs-omgevingswet

Ministerie van Infrastructuur en Milieu (2012) *Stand van zaken ontwikkeling omgevingswet.* Interdepartementaal programma Eenvoudig Beter. Den Haag: Ministerie van Infrastructuur en Milieu. Retrieved 12 January 2020, from https://www.rijksoverheid.nl/documenten/brochures/2012/03/10/stand-van-zaken-ontwikkeling-omge

https://www.rijksoverheid.nl/documenten/brochures/2012/03/10/stand-van-zaken-ontwikkeling-omge vingswet

Ministerie van Infrastructuur en Milieu (2013). *Waarom een nieuwe Omgevingswet? Schets omgevingsrechtelijke problemen*. Interdepartementale Programmadirectie Eenvoudig Beter. Den Haag: Ministerie van Infrastructuur en Milieu. Retrieved, 12 January 2020, from https://www.omgevingswetportaal.nl/documenten/brochures/2013/03/waarom-een-omgevingswet/waa rom-een-omgevingswet

Ministerie van Infrastructuur en Milieu. (2014). *Regels over het beschermen en benutten van de fysieke leefomgeving (Omgevingswet)*. Den Haag, Ministerie van Infrastructuur en Milieu

Monumenten.nl (n.d.) *Zwolle*. Retrieved 21st of March 2020, from https://www.monumenten.nl/gemeentes/zwolle

Navigator (n.d.) *Omgevingswet: omgevingsvisie*. Retrieved 10 January 2020, from https://www.navigator.nl/thema/1069/omgevingswet-omgevingsvisie

NILOS (n.d.) *Monumentenwet 1988*. Retrieved 12 January 2020, from https://www.google.com/search?q=Monumentenwet+1988&rlz=1C1GCEA\_enNL885&sxsrf=ACYB GNSS0Epoa\_y1G7B45J6eFehOuYv7IQ:1579703760685&ei=0F0oXo26KcjasAelj4TgBA&start=10 &sa=N&ved=2ahUKEwiN4oWMt5fnAhVILewKHaUHAUwQ8tMDegQICxAu&biw=1680&bih=89 0

Overheid.nl (n.d.) *Gemeentelijke monumenten Tilburg*. Retrieved 21st of March 2020, from https://data.overheid.nl/dataset/gemeentelijke-monumenten-tilburg

Papadopoulos, Y. (2012) 'The Democratic Quality of Collaborative Governance'. In: David Levi-Faur (ed.) *The Oxford Handbook of Governance*. Oxford: Oxford University Press: 512-526 (Chapter 36)

Phillips, R. J., & Martin, G. (2019). Listing and protecting culturally significant events: intangible cultural heritage and policy considerations for hockey broadcasting in Canada. *International Journal of Cultural Policy*, 1-13.

Pollitt, C. (2003). Joined-up government: a survey. Political studies review, 1(1), 34-49.

Raad voor het Openbaar Bestuur (2008) *Beter besturen bij Rampen*. Retrieved14 January 2020, from https://www.raadopenbaarbestuur.nl/documenten/publicaties/2008/07/10/beter-besturen-bij-rampen-e n-crises

Rijksdienst voor het Cultureel Erfgoed (n.d.a.) Omgevingswet versus Erfgoedwet. Retrieved 13 January 2020, from

https://www.cultureelerfgoed.nl/onderwerpen/omgevingswet/erfgoed-in-de-omgevingswet/omgevings wet-versus-erfgoedwet

Rijksdienst voor het Cultureel Erfgoed (n.d.b) *Rijksmonumentenregister*. Retrieved 24th of January 2020, from https://monumentenregister.cultureelerfgoed.nl/

Rijksoverheid (n.d). *Nieuwe Omgevingswet maakt omgevingsrecht eenvoudiger*. Retrieved 17 January 2020, from

https://www.rijksoverheid.nl/onderwerpen/omgevingswet/inhoud/vernieuwing-omgevingsrecht

Ros, S. & Zomer, J. (2018) *Erfgoed in de Omgevingswet*. Steunpunt Monumenten & Archeologie Noord-Holland. Retrieved 4 January 2020, from https://www.steunpunterfgoednh.nl/erfgoed-in-de-omgevingswet/

Saunders, M., Lewis, P., & Thornhill, A. (2007). *Research Methods for Business Students 6th Edition*. London: Pearson Education.

SIKB (n.d.) *Erfgoedverordening*. Retrieved 13 January 2020, from https://www.sikb.nl/archeologie/archeologie-en-ruimte/erfgoedverordening

Tonnaer (n.d.) *Goed omgevingsplan vereist tenminste omgevingsvisie light*. Retrieved 11 January 2020, from

https://www.tonnaer.nl/publicatie/goed-omgevingsplan-vereist-ten-minste-omgevingsvisie-light/

Tosun, J., & Lang, A. (2017). Policy integration: mapping the different concepts. *Policy Studies*, *38*(6), 553-570.

Tweede Kamer der Staten Generaal (2011) Vaststelling van overgangsrecht en wijziging van diverse wetten ten behoeve van de invoering van de Wet algemene bepalingen omgevingsrecht. Kamerstukken 2010-2011 31953 Nr. 39. Retrieved 17 January 2020, from https://zoek.officielebekendmakingen.nl/kst-31953-39.html

Tweede Kamer der Staten Generaal (2012a) *Omgevingsrecht*. Kamerstukken 2011-2012 33118 Nr. 3 Retrieved 17 January 2020, from https://zoek.officielebekendmakingen.nl/kst-33118-3.html

Utrechts Archief (n.d.) *Archieven - Fotografische Documenten*. Retrieved 1 April 2020, from https://hetutrechtsarchief.nl/onderzoek/resultaten/archieven?miview=inv2&mivast=0&mizi g=210&miadt=39&miaet=14&micode=BEELDBANK\_FOT\_DOC\_1A&minr=41 371700

Van Thiel, S. (2015). *Bestuurskundig Onderzoek: Een methodologische inleiding*. Bussum: Coutinho (3rd edition)

Vennix, J. (2011). Theorie en Praktijk van Empirisch Onderzoek. Amsterdam: Pearson (Fifth Edition)

VNG (n.d.a.) Participatie. Retrieved 10 January 2020, from https://vng.nl/artikelen/participatie

VNG (n.d.b) *De gemeentelijke omgevingsvisie*. Retrieved 11 January 2020, from https://vng.nl/artikelen/de-gemeentelijke-omgevingsvisie

Volkskrant (March 9th 2012) *Minister Schultz voeg 15 wetten ruimtelijke ordening samen*. Retrieved 11th of March 2020, from

https://www.volkskrant.nl/nieuws-achtergrond/minister-schultz-voegt-15-wetten-ruimtelijke-ordening -samen~b4cd2c82/

Vroegindeweij, G. (February 13th 2020) *Omgevingswet leidt tot juridisch oerwoud en veel procedures*. Reformatorisch Dagblad. Retrieved 11th of March 2020, from https://www.rd.nl/vandaag/binnenland/omgevingswet-leidt-tot-juridisch-oerwoud-en-veel-procedures-1.1631879

Workman, S., Jones, B. D., & Jochim, A. E. (2009). Information processing and policy dynamics. *Policy Studies Journal*, *37*(1), 75-92.

Yin, R.K. (2003) Case Study Research. Design and Methods. Sage, Thousand Oaks. (Chapter 2).

Zahariadis, N. (2007) The Multiple Streams Framework; Structure, Limitations, Prospects in: Sabatier, P.A. (ed.) *Theories of the Policy Process*. Boulder: Westview Press

Gemeente	Vastelling	Rijksmonument/1000 inwoners
Aa en Hunze	2019	3
Alkmaar	2017	5.3
Almere	2017	0
Bergen (L)	2019	2
Bladel	2018	1.1
Elburg	2018	14.2
Emmen	2017	0.9
Groningen	2018	3.5
Hellendoorn	2014	0.8
Hillegom	2018	0.3
Hollandse Kroon	2016	2.6
Katwijk	2018	0.8
Leusden	2018	3.1
Noordenveld	2017	7.5
Noordwijk	2017	2
Nunspeet	2018	1.9
Oirschot	2017	10
Oisterwijk	2017	2.3
Oldambt	2017	5.6
Oldebroek	2018	1.9
Ommen	2013	5.7
Opsterland	2015	3.7
Renswoude	2017	10.1
Reusel-De Mierden	2018	1.1
Ridderkerk	2017	1.2
Sittard-Geleen	2016	2.8
Staphorst	2018	17.5
Steenwijkerland	2017	6.2
Tilburg	2015	1.5
Uden	2015	0.6
Voerendaal	2016	7.9
Voorst	2017	6.8
Waterland	2017	18.5
Westvoorne	2016	2.3
Zwolle	2017	3.8

# Appendix I - Overview municipalities with an environmental strategy

## **Appendix II - Interview guide**

Inleiding: Allereerst hartelijk dank dat u wil deelnemen aan dit interview. Ik zal kort toelichten welke onderwerpen ik graag met u zou willen bespreken. Aan het einde zal ik uitleggen wat het precieze doel is van het onderzoek. Als ik dat nu al doe zou dat het gesprek te erg sturen.

Ik wil graag grofweg drie thema's met u bespreken:

- Veranderingen van de omgevingswet en het doel van de visie
- De rol van het thema erfgoed binnen de nieuwe visie: wat heeft u zoal besproken
- Beleidsintegratie en participatie: erfgoed binnen deze thema's.

Het interview duurt ongeveer een uur. Zijn er voordat ik verder ga bij u nu vragen?

#### Thema I - Een nieuwe omgevingswet

Zoals u waarschijnlijk weet en heeft gemerkt is de omgevingswet een fundamentele verandering in de Ruimtelijke ordening. De overstap naar de zes leidende instrumenten in een meer flexibele dynamische setting waarbij bijna alle bestaande ruimtelijke regels zijn samengevoegd in een kaderwet heeft een aantal grote veranderingen met zich mee gebracht. Twee van de belangrijkste zijn hierbij integratie van de verschillende ruimtelijke domeinen en de vergrote plaats van participatie bij het opstellen van ruimtelijke plannen. Over deze twee belangrijke veranderingen wil ik het graag eerst hebben

#### Beleidsintegratie

- Kunt u het proces van het opstellen van de visie aan mij omschrijven? Hoe is dat precies gegaan? Wie waren er betrokken?
- Werden verschillende thema's aan elkaar gelinkt? Of werden veel thema's nog thema voor thema besproken?
- Hoe ziet u de gevolgen van het samenvoegen van ruimtelijke domeinen terug in de omgevingsvisie?

- Wordt er meer verbinding gelegd tussen de ruimtelijke domeinen denkt u?
- Was er meer aandacht voor bepaalde thema's dan bij de structuurvisie? Waar lag nu veel focus?

#### Burgerparticipatie

- Wat voor vormen van burgerparticipatie heeft u gezien bij de omgevingsvisie?
- Wat voor een mensen kwamen inspreken bij de omgevingsvisie?
- Welke thema's waren voor hen belangrijk? Of in ieder geval wat kwam vaak naar voren?
- Wat waren positieve gevolgen van burgerparticipatie volgens u?

### Thema II - Erfgoed

De nieuwe omgevingsvisie omvat een scala aan verschillende ruimtelijke domeinen die allemaal een nieuw plekje moeten krijgen binnen de omgevingsvisie. Sommige thema's krijgen logischerwijs meer aandacht dan andere. Ik heb gekozen om op één thema te focussen omdat het simpelweg te groot is om alle thema's binnen de omgevingsvisie te bestuderen en wil het daarom graag nog specifiek over erfgoed binnen de omgevingsvisie hebben met u

Voordat ik dat doe wil graag vragen welke rol voor u de omgevingsvisie heeft t.o.v. het omgevingsplan?

#### Beleidsoverwegingen

- Op welke manier is erfgoed in uw omgevingsvisie teruggekomen?

_	Welke thema's heeft u daar	hii hesnroken?
-	WEIKE LITETTIA STIEETLU UAAI	

#### Reactie op aanwezigheid erfgoed

- Welke discussie heeft u gehad over erfgoed? Zijn er ook dingen aan bod gekomen die de visie niet hebben gehaald?
- Wat was de reden dat u dit over erfgoed heeft opgenomen?
- Welke achterliggende argumenten zijn er gebruikt?
  - Is de haalbaarheid van de voorstellen besproken?
  - Zijn er alternatieven afgewogen voor de voorstellen of was dit de duidelijke lijn voor erfgoed?
  - Zijn er ook normatieve argumenten geweest omtrent de toevoeging van erfgoed?
  - Voelde het als een verplichting erfgoed mee te nemen in de visie?

#### Thema III - Erfgoed en de nieuwe omgevingswet

Ik wil graag nog kort terug naar de eerste vragen maar dan specifiek toegepast op erfgoed. Dat betekent dat ik graag nog even de gevolgen van integratie en van participatie voor erfgoed specifiek wil bespreken

#### Integratie

- Heeft u het idee dat erfgoed nu beter gecombineerd is met andere beleidsdomeinen? Dat er een betere aansluiting is met andere thema's binnen de ruimtelijke ordening?

- Zijn er ideeën uit andere thema's verwerkt in erfgoed?
- Heeft u het idee dat erfgoed geprofiteerd heeft van de combinatie met andere beleidsdomeinen?
- Is erfgoed individueel behandeld? Heeft het meer of minder aandacht in de nieuwe visie?

Participatie

- Is erfgoed naar voren gekomen bij de burgerparticipatie?
- Op welke manier heeft u dat teruggezien?
- Wie heeft het opgebracht?
- Heeft het bijgedragen aan hoe erfgoed in de visie is terug te vinden?

## Appendix III - Overview codes per concept per indicator

Aanvaardbaarheid 'De intersubjectieve waardering van	Gewenste staat	<u>Gewenst gebruik</u> Waardering
beleid door burgers' (Hemerijck &		Gewenst behoud
Нагеи, 2004 р. 60)		<u>Zichtbaarheid</u>
		<u>Beleefbaarheid</u>
		Gewenste bescherming
	<u>Gewenst nut</u>	Gewenste staat toekomst
		Gewenste herkenbaarheid
		Passendheid RO bij erfgoed
		Zonne-energie monumenten
		Waardering RE
		Bepalend voor RO
	Gewenste invloed	Gewenste RK
		<u>Bereikbaarheid</u>
		Gewenste versterking
		Gewenste ontwikkeling
		Gebruik bij RO

Haalbaarheid De mate waarin politieke, bestuurlijke en maatschappelijke organisaties mee kunnen en willen werken aan de implementatie van een beleid (Hemerijck & Hazeu, 2004 p. 59)	<i>Uitvoerbaarheid</i> <u>Belanghebbende actoren</u>	Aansluiting ander thema Afweging behoud gebruik Behoud voor gebruik Religieus erfgoed inpassen Behoud door ontwikkeling Draagvlak voor behoud Voorkomen leegstand Economisch aantrekkelijk Behoud door herbestemmen
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Doelmatigheid	Weighing of choices	Monumentale status bepaalt
De effectiviteit van oplossingen voor maatschappelijke vraagstukken (Hemerijck & Hazeu, 2004 p. 59)	Policy instruments	woningbouw Beschrijving beschermingsregime Beschrijving financiering Aanwijzen beschermd aangezicht Verduurzaming panden Beperkingen boomteelt voor
		uitstraling Afwegingsmatrix welstand Monumentenverordening

Rechtvaardigheid De rechtsgeldigheid van het handelen	Description of space	Beschrijving kwaliteit, Beschrijving RE Beschrijving toekomstige
van de overheid (Hemerijck & Hazeu, 2004 p. 60)	Description of place	kwaliteit <u>Toekomstig in kaart brengen</u> <u>Erfgoednota</u> Beknopte beschrijving
		kwaliteit Erfgoedkaart

Information processing	Integrated discussions	Domeinen door elkaar
Dependedness of attention to		Themavrij werken
information on the current total		Individueel lijst OW
		Aandacht verdeling constant
flow of information (Baumgartner		Kaderloos
& Jones, 2005 p. 62)'		Individueel erfgoed
	Individual processing of	Behandeling per thema
	spatial domains	Aparte discussie experts
		Erfgoed hiervoor aanwezig
		Individuele behandeling met
		lobby
	Change in attention per	Aandacht veel strategischer
	domain	Basis structuurvisie

Synergie The creation of better solutions as a consequence of complementary perspectives and partnership	Tegenstrijdigheden voorkomen	Betrekken andere domeinen Integraal benaderen Verbinding zonder erfgoed Open discussie
between actors (Jones & Barry, 2011, p. 37)	Inzichten andere domeinen verwerkt	Bewustwording Verbinding met erfgoed Hoger abstractie niveau Grensoverschrijdend werken Tegenstrijdigheden
		voorkomen <u>Creatievere oplossingen</u> <u>Buiten hokjes denken</u> Meer uitvoerbaar
	Actieve verbinding andere domeinen	Economisch aantrekkelijk Aanleunende thema's Breder kijken Integratie voor uitvoerbaarheid <b>Over grenzen uitdaging</b>
		Betere afstemming Weinig integratie erfgoed Eyeopener

Public participation 'De intersubjectieve waardering van	Determine preferences	<u>Stakeholder erfgoed</u> Inspraak themagebonden
beleid door burgers' (Hemerijck & Hazeu, 2004 p. 60)	Use local knowledge	Geen participatie erfgoed <u>Lobby uitgenodigd</u> Steun
	Receive support	Voorkeuren Wel participatie erfgoed Informatie lokaal ophalen Justice opportunities
	Justice opportunities	Verplichting <b>Open inspraak</b> Informeren

Overig	Toeristisch relevant
	Dragers identiteit
	Erfgoed als verhaal
	Ontstaansgeschiedenis in beeld
	Verbinding sociaal domein
	Overwegingen overbodig geen wijzigingen
	RE geen vraag
	Ingestoken door Raad
	Abstractieniveau
	Geen erfgoedambtenaar
	Erfgoedambtenaar
	Abstract/concreet
	Ingestoken door participatie
	Ingestoken vanuit AO
	Sterke sturing Raad
	Integratie/demarcatie
	Geen specifieke functie erfgoed
	Overparticiperen

## **Appendix IV - Coding environmental strategies**

Elburg	Codes
Aanvaardbaarheid	Gewenst gebruik Waardering
Haalbaarheid	Aansluiting ander thema (algemeen) Afweging behoud gebruik
Doelmatigheid	
Rechtvaardigheid	Beschrijving kwaliteit
Overig	Toeristisch relevant

Oisterwijk	Codes
Aanvaardbaarheid	Waardering Gewenste bescherming
Haalbaarheid	Behoud voor gebruik Behoud door herbestemmen (RE)
Doelmatigheid	
Rechtvaardigheid	Beschrijving kwaliteit Ontstaansgeschiedenis
Overig	Toeristisch relevant

Ommen	Codes
Aanvaardbaarheid	Gewenst behoud Gewenst gebruik Zichtbaarheid Beleefbaarheid Passendheid RO bij erfgoed
Haalbaarheid	Aansluiting ander thema (Toerisme) Behoud door ontwikkeling

Doelmatigheid	Monumentale status bepaalt woningbouw Beschrijving beschermingsregime Beschrijving financiering
Rechtvaardigheid	Beschrijving ruimtelijke kwaliteit Gegevens monumenten
Overig	

Westvoorne	Codes
Aanvaardbaarheid	Gewenste staat toekomst Gewenste bescherming Gewenste herkenbaarheid Zichtbaarheid Bereikbaarheid
Haalbaarheid	Draagvlak voor behoud
Doelmatigheid	Aanwijzing beschermd aangezicht
Rechtvaardigheid	Beschrijving ruimtelijke kwaliteit Dragers identiteit
Overig	

Waterland	Codes
Aanvaardbaarheid	Waardering Passendheid RO bij erfgoed Zonne-energie monumenten
Haalbaarheid	Aansluiting ander thema (toerisme)
Doelmatigheid	
Rechtvaardigheid	Beschrijving RK Gegevens monumenten
Overig	

Staphorst	Codes
Aanvaardbaarheid	Zonne-energie monumenten Passendheid RO bij erfgoed

Haalbaarheid	Afweging behoud gebruik Behoud door ontwikkeling Aansluiting ander thema (transport)
Doelmatigheid	Verduurzaming panden
Rechtvaardigheid	Beschrijving RK Drager identiteit
Overig	

Oirschot	Codes
Aanvaardbaarheid	Waardering Gewenste bescherming Gewenst versterking Gewenst behoud Waardering RE
Haalbaarheid	Aansluiting ander thema (economie) Behoud door ontwikkeling Economisch aantrekkelijk Voorkomen leegstand
Doelmatigheid	Beperkingen boomteelt voor uitstraling
Rechtvaardigheid	Beschrijving kwaliteit Drager identiteit
Overig	

Noordenveld	Codes
Aanvaardbaarheid	Bepalend voor RO Waardering Gewenst behoud Gewenst gebruik
Haalbaarheid	Aansluiting ander thema (toerisme) Economisch aantrekkelijk
Doelmatigheid	
Rechtvaardigheid	Beschrijving RK Drager identiteit

Overig	Toeristisch relevant

Steenwijkerland	Codes
Aanvaardbaarheid	Gewenst behoud Gewenste bescherming
Haalbaarheid	Afweging behoud door gebruik Aansluiting ander thema (toerisme)
Doelmatigheid	
Rechtvaardigheid	Beschrijving kwaliteit Beschrijving toekomstige kwaliteit Identiteit
Overig	

Voerendaal	Codes
Aanvaardbaarheid	Gewenst behoud Beleefbaarheid
Haalbaarheid	Behoud door ontwikkeling Behoud door herbestemmen
Doelmatigheid	
Rechtvaardigheid	RK
Overig	

Opsterland	Codes
Aanvaardbaarheid	Gewenst behoud Gewenst gebruik
Haalbaarheid	Behoud door herbestemmen
Doelmatigheid	
Rechtvaardigheid	Toekomstig in kaart brengen

Overig	

Oldambt	Codes
Aanvaardbaarheid	Zichtbaarheid Gewenst behoud Gewenste RK
Haalbaarheid	Aansluiting ander thema Behoud door herbestemmen Voorkomen leegstand
Doelmatigheid	Afwegingsmatrix welstand
Rechtvaardigheid	Beschrijving RK
Overig	

Groningen	Codes
Aanvaardbaarheid	Gewenst gebruik Bepalend voor RO Bereikbaarheid Beleefbaarheid
Haalbaarheid	Aansluiting ander thema Behoud door ontwikkeling
Doelmatigheid	
Rechtvaardigheid	Efgoednota Beknopte beschrijving kwaliteit
Overig	

Aa en Hunze	Codes
Aanvaardbaarheid	Gewenst behoud Gewenste versterking
Haalbaarheid	
Doelmatigheid	
Rechtvaardigheid	Beschrijving RK

	Erfgoed als verhaal
Overig	

Sittard-Geleen	Codes
Aanvaardbaarheid	Gewenste bescherming Gewenst behoud Gewenste ontwikkeling
Haalbaarheid	Behoud door ontwikkeling Afweging behoud gebruik Aansluiting ander thema
Doelmatigheid	Beschrijving beschermingsregime
Rechtvaardigheid	Beschrijving RK Gegevens monumenten
Overig	

Oldebroek	Codes
Aanvaardbaarheid	Zichtbaarheid Beleefbaarheid Gewenste versterking
Haalbaarheid	
Doelmatigheid	Beschrijving beschermingsregime
Rechtvaardigheid	Toekomstig in kaart brengen
Overig	

Nunspeet	Codes
Aanvaardbaarheid	Gewenste herkenbaarheid Zichtbaarheid Gewenste versterking
Haalbaarheid	
Doelmatigheid	

Rechtvaardigheid	Beschrijving kwaliteit Gegevens monumenten Toekomstig in kaart brengen Ontstaansgeschiedenis in beeld
Overig	

Ridderkerk	Codes
Aanvaardbaarheid	Zichtbaarheid Gewenste herkenbaarheid Passendheid RO bij erfgoed
Haalbaarheid	
Doelmatigheid	
Rechtvaardigheid	Ontstaansgeschiedenis in beeld Dragers identiteit
Overig	

Katwijk	Codes
Aanvaardbaarheid	Gewenste versterking Gewenst gebruik Gebruik bij RO
Haalbaarheid	Aansluiting ander thema (Recreatie)
Doelmatigheid	
Rechtvaardigheid	Beknopte beschrijving kwaliteit Toekomstig in kaart brengen Dragers identiteit
Overig	

Reusel-De Mierden	Codes
Aanvaardbaarheid	Waardering Gewenste herkenbaarheid Zichtbaarheid Passendheid Ro bij erfgoed

	Waardering RE
Haalbaarheid	Behoud door ontwikkeling Behoud door herbestemmen
Doelmatigheid	
Rechtvaardigheid	Beknopte beschrijving kwaliteit Beschrijving kwaliteit Erfgoedkaart Drager identiteit
Overig	

Bladel	Codes
Aanvaardbaarheid	
Haalbaarheid	
Doelmatigheid	Beschrijving beschermingsregime (Rijksmonumenten)
Rechtvaardigheid	
Overig	

Uden	Codes
Aanvaardbaarheid	
Haalbaarheid	
Doelmatigheid	
Rechtvaardigheid	
Overig	

Hillegom	Codes
Aanvaardbaarheid	Gewenst behoud Zichtbaarheid

	Beleefbaarheid Gewenste versterking
Haalbaarheid	Aansluiting ander thema (recreatie) Behoud door herbestemmen Afweging behoud gebruik Behoud door ontwikkeling
Doelmatigheid	Beschrijving beschermingsregime
Rechtvaardigheid	Beschrijving kwaliteit Beschrijving kwaliteit RE Erfgoedkaart Dragers identiteit
Overig	

Almere	Codes
Aanvaardbaarheid	Gebruik bij RO
Haalbaarheid	
Doelmatigheid	Monumentenverordening
Rechtvaardigheid	Beschrijving RK
Overig	

Tilburg	Codes
Aanvaardbaarheid	Beleefbaarheid Gewenste herkenbaarheid Gebruik bij RO Gewenste versterking Waardering RE Gewenst gebruik Zichtbaarheid
Haalbaarheid	Behoud door ontwikkeling Aansluiting ander thema Behoud door herbestemmen
Doelmatigheid	
Rechtvaardigheid	Beschrijving RK Erfgoed als verhaal Drager identiteit
Overig	

Zwolle	Codes
Aanvaardbaarheid	Gewenst behoud Waardering Zonne-energie monumenten Beleefbaarheid Gewenste versterking Gebruik bij RO
Haalbaarheid	Behoud door herbestemmen Religieus erfgoed inpassen
Doelmatigheid	Regelgeving zonnepanelen
Rechtvaardigheid	Dragers identiteit Erfgoedkaart
Overig	

Alkmaar	Codes
Aanvaardbaarheid	Waardering Gebruik bij RO Gewenst behoud Gewenste versterking Bepalend bij RO Beleefbaarheid Passendheid RO bij erfgoed
Haalbaarheid	Behoud door herbestemmen Behoud door ontwikkeling Aansluiting ander thema
Doelmatigheid	Beschrijving beschermingsregime
Rechtvaardigheid	Toekomstig in kaart brengen Drager identiteit Beschrijving kwaliteit
Overig	

Voorst	Codes
Aanvaardbaarheid	Gewenst behoud Gewenste versterking
Haalbaarheid	Aansluiting ander thema (recreatie) Behoud door ontwikkeling Behoud door herbestemmen
Doelmatigheid	
Rechtvaardigheid	Beschrijving RK Drager identiteit
Overig	

Hollands Kroon	Codes
Aanvaardbaarheid	Waardering Gebruik bij RO Gewenst behoud
Haalbaarheid	Aansluiting ander thema
Doelmatigheid	Beschrijving beschermingsregime
Rechtvaardigheid	Beknopte beschrijving kwaliteit
Overig	

Bergen	Codes
Aanvaardbaarheid	Passendheid RO bij erfgoed Waardering Gewenst behoud RE
Haalbaarheid	
Doelmatigheid	
Rechtvaardigheid	Beknopte beschrijving kwaliteit
Overig	

Renswoude	Codes
Aanvaardbaarheid	Passendheid RO bij erfgoed
Haalbaarheid	Aansluiting ander thema (Toerisme)
Doelmatigheid	
Rechtvaardigheid	Beschrijving kwaliteit
Overig	

Hellendoorn	Codes
Aanvaardbaarheid	Gewenst behoud Passendheid RO bij erfgoed Zichtbaarheid
Haalbaarheid	Afweging behoud gebruik Behoud door ontwikkeling
Doelmatigheid	
Rechtvaardigheid	Beknopte beschrijving kwaliteit Drager identiteit
Overig	

Leusden	Codes
Aanvaardbaarheid	Gewenste herkenbaarheid Gebruik bij RO Gewenste versterking Gewenste bescherming
Haalbaarheid	
Doelmatigheid	Vormeisen erfgoed nieuwe RO Omgevingswaarde erfgoed
Rechtvaardigheid	Beschrijving kwaliteit Drager identiteit
Overig	

## **Appendix V - Coding interviews**

Renswoude	Codes	
Aanvaardbaarheid	Bereikbaarheid Gewenst behoud Zichtbaarheid Gewenst gebruik	
Haalbaarheid	Aansluiting ander thema	
Doelmatigheid		
Rechtmatigheid	Beschrijving ruimtelijke kwaliteit	
Synergie	Betrekken andere domeinen Integraal benaderen Verbinding zonder erfgoed Open inbreng discussie	
Informatie-relativiteit	Domeinen door elkaar bespreken Individueel door lijst ministerie Individueel erfgoed (Kasteel)	
Participatie	Specifieke stakeholder erfgoed Inspraak themagebonden Burgers niet erfgoed Steun Voorkeuren Informeren	
Overig	Overwegingen overbodig geen wijziging RE geen vraag Ingestoken door de Raad Abstractieniveau Geen erfgoedambtenaar Vigerend beleid → des te relevanter in kleine gemeente	

Leusden	Codes	
Aanvaardbaarheid	Behouden	
Haalbaarheid	Draagvlak voor behoud (politiek)	
Doelmatigheid	Beschrijving beschermingsregime	
Rechtmatigheid	Beschrijving RK	
Synergie	Bewustwording Verbinding met erfgoed (Wonen) Integraal beanderin Eyeopener Grensoverschrijdend werken	
Informatie-relativiteit	Kaderloos Domeinen door elkaar Aandacht verdeling constant	
Participatie	Voorkeuren Stakeholder erfgoed Justice opportunities Wel inspraak erfgoed Steun Open inspraak	
Overig	Erfgoedambtenaar Ingestoken door participatie Abstractieniveau Abstract/concreet	

Hollands Kroon	Codes	
Aanvaardbaarheid	Beleefbaarheid Gewenst gebruik	
Haalbaarheid	Aansluiting andere thema's	
Doelmatigheid	Bewust regelarm	
Rechtmatigheid	Erfgoedkaart Toekomstige erfgoednota	
Synergie	Integraal benaderen Invloed relatie tussen domeinen Grensoverschrijdend werken Tegenstrijdigheden voorkomen Creatievere oplossingen Grensoverschrijdend werken Buiten hokjes denken Aanleunende thema's Integratie voor uitvoerbaarheid	
Informatie-relativiteit	Domeinen door elkaar Themavrij werken Aandacht verdeling constant	
Participatie	Open inspraak Inspraak themagebonden Voorkeuren Verplichting	
Overig	Ingestoken vanuit AO Sterke sturing raad Integratie/demarcatie Abstractieniveau Geen erfgoedambtenaar	

Hellendoorn	Codes	
Aanvaardbaarheid	Gewenst behoud Waardering Gebruik bij RO Bepalend bij RO	
Haalbaarheid	Aansluiting andere thema's Economisch aantrekkelijk	
Doelmatigheid	Regels aangezicht daken	
Rechtmatigheid		
Synergie	Aanleunend thema toerisme Aanleunend thema natuur Economisch aantrekkelijk	
Informatie-relativiteit	Behandeling per thema Aandacht verdeling constant Basis structuurvisie Aparte discussie door experts	
Participatie	Inspraak themagebonden Lobby uitgenodigd Geen participatie erfgoed Voorkeuren horen Informatie ophalen lokaal Steun	
Overig	Abstractieniveau Geen specifieke functie erfgoed Overweging overbodig geen wijziging Ingestoken vanuit AO	

Borgon (Limburg)	Codes
Bergen (Limburg)	Codes
Aanvaardbaarheid	Waardering RE
	Waardering Gewenst behoud
	Gewenst behoud
Haalbaarheid	
Doelmatigheid	
Rechtmatigheid	Beschrijving Ruimtelijke Kwaliteit
	Inventarisatie erfgoed
Synergie	Integraal benaderen
	Betere afstemming
	Meer uitvoerbaar
	Aanleunend thema (toerisme)
Informatie-relativiteit	Individueel door lijst OW
	Themavrije werken
	Aandacht verminderd Individueel erfgoed (RE)
Participatie	Voorkeuren
	Steun
	Stellingen Open inspraak
	Geen participatie erfgoed
Queria	
Overig	Ingestoken vanuit AO Abstractieniveau
	Overwegingen overbodig geen wijzigingen
	Geen erfgoedambtenaar

Alkmaar	Codes
Aanvaardbaarheid	Zichtbaarheid Gewenst gebruik Gebruik bij RO Passendheid erfgoed bij RO Waardering Gewenste versterking
Haalbaarheid	Aansluiting andere thema's Behoud door ontwikkeling Behoud met gebruik
Doelmatigheid	Bestaand monumentenbeleid goed Geen levend museum
Rechtmatigheid	Overzicht RK
Synergie	Betrekken andere domeinen Grensoverschrijdend werken Hoger abstractieniveau mogelijk Verbinding met erfgoed (stedenbouw; toerisme) Bewustwording Integraal beanderen Open inbreng discussie Over grenzen uitdaging
Informatie-relativiteit	Domeinen door elkaar Aparte discussie door experts Behandeling per thema Aandacht verdeling constant Erfgoed hiervoor sterk aanwezig
Participatie	Justice opportunities Informatie lokaal ophalen Steun Wel participatie erfgoed Voorkeuren Stakeholders erfgoed Inspraak themagebonden
Overig	Ingestoken vanuit AO Abstractieniveau Abstract/concreet Erfgoedambtenaren

Hillegom	Codes
Aanvaardbaarheid	Gewenst behoud Waardering Gebruik bij RO Zichtbaarheid Waardering RE
Haalbaarheid	Afweging behoud gebruik Aansluiting andere thema's
Doelmatigheid	Herbestemmen RE? Geen levend museum
Rechtmatigheid	Beschrijving kwaliteit Toekomstig in kaart brengen
Synergie	Integraal benaderen Over grenzen uitdaging Tegenstrijdigheden voorkomen Hoger abstractieniveau mogelijk Grensoverschrijdend werken Weinig integratie erfgoed
Informatie-relativiteit	Domeinen door elkaar Themavrij Aandacht verdeling constant Individuele behandeling met lobby
Participatie	Open inspraak Participatie met erfgoed Steun Voorkeur Lokale informatie Stakeholder erfgoed
Overig	Ingestoken door participatie Abstractieniveau Geen erfgoedambtenaar

Zwolle	Codes	
Aanvaardbaarheid	Waardering Passendheid RO bij erfgoed Beleefbaarheid Herkenbaarheid Gebruik bij RO	
Haalbaarheid	Aansluiting andere thema's	
Doelmatigheid	Herbestemmen RE Zonne-energie bescherming Bestaand monumentenbeleid goed Integrale aanpak uitvoering problemen Uitvoeringsstrategie	
Rechtmatigheid	Beschrijving kwaliteit	
Synergie	Verbinding Sociaal domein Verbinding met erfgoed Aanleunende thema's Grensoverschrijdend werken Integraal benaderen Bewustwording Breder kijken Eyeopener Creatievere oplossingen	
Informatie-relativiteit	Domeinen door elkaar Aparte discussie door experts Aandacht verderling constant	
Participatie	Steun Geen participatie erfgoed Voorkeuren	
Overig	Ingestoken vanuit AO Abstractieniveau Overparticiperen Abstract/concreet Erfgoedambtenaren	

Tilburg	Codes
Aanvaardbaarheid	Gebruik bij RO Passendheid RO bij erfgoed Waardering Zichtbaarheid Gewenst behoud RE Waardering RE
Haalbaarheid	
Doelmatigheid	Beschrijving beschermingsregime (Afwegingskader beschermingsniveau)
Rechtmatigheid	Beschrijving kwaliteit
Synergie	Verbinding met erfgoed Breder kijken Integraal benaderen
Informatie-relativiteit	Behandeling per thema Aparte discussie door experts Aandacht veel strategischer
Participatie	Open inspraak Informatie lokaal ophalen Steun Voorkeuren Geen participatie erfgoed
Overig	Ingestoken vanuit AO Inzet specifieke wethouder Erfgoedambtenaren

## **Appendix VI - Overview Respondents**

Personal Communication Municipality	Function	Date
Leusden	Beleidsadviseur RO	10 February 2020
Hellendoorn	Accountmanager RO	11 February 2020
Hollands Kroon	Adviseur RO	12 February 2020
Alkmaar	Projectleider Omgevingsvisie	17 February 2020
Zwolle	Projectleider Omgevingsvisie	2 March 2020
Tilburg	Beleidsmedewerker RO Beleidsmedewerker RO	24 February 2020
Hillegom	Beleidsmedewerker Omgevingswet	27 February 2020
Renswoude	Consultant Omgevingswet	5 February 2020
Bergen	Juridisch Adviseur	7 February 2020