



USING DISCOURSE NETWORK ANALYSIS TO STUDY THE POLITICS OF POLICY IMPLEMENTATION

THE ENVIRONMENT AND PLANNING ACT IN THE NETHERLANDS



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MASTER'S THESIS
MSc Engineering and Policy Analysis

Using Discourse Network Analysis to Study the Politics of Policy Implementation: The Environment and Planning Act in the Netherlands

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Master thesis submitted to Delft University of Technology in partial fulfilment of the
requirements for the degree of

MASTER OF SCIENCE
in Engineering and Policy Analysis

to be defended publicly on Friday August 30th, 2024 at 14:30 CET.

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Executive Summary

Context

The Environment and Planning Act (EPA) is a major legislative policy with the intent to revise the Dutch spatial planning system through decentralisation. However, before its introduction date in January 2024, its implementation had encountered several challenges, including delays, rising media attention, and political tensions. With the politicised climate surrounding EPA, the thesis investigates how politics influences the implementation of EPA.

Purpose and Approach

The study employs a discourse analysis approach, a means to studying public discourse where policy actors engage in discourse within the public sphere to convey their ideas about a given policy to the general public. The main discursive unit is the storyline, which is a shared interpretation of the policy employed by actors in their public claims.

Hence, the overarching research question is as follows:

What does the public discourse surrounding the Environment and Planning Act (EPA) in the Netherlands reveal about its policy implementation?

Methodology

Data was collected from the public discourse surrounding EPA between its legislative inception in 2011 and its formal introduction in 2024. Four prominent Dutch newspapers—NRC, De Volkskrant, Friesch Dagblad, and Leidsch Dagblad—served as data sources.

The research utilises the Discourse Network Analysis methodology, which combines various content and network analyses to reveal changing descriptive and structured patterns of the public discourse.

First, the content analysis is used to characterise the nature of public discourse and identify critical factors that influence policy implementation. Second, the analysis of the actor and storyline congruence network captures coalition structures and the discursive context, respectively; it is used to explain how and why the public discourse evolves with respect to key events in media and the policy process. Third, a “meso-level” network analysis of actor’s positions within the actor congruence network is used to describe their responses to the shifting public discourse through changes in positions within the network.

Key Findings

Three key findings that correspond to the three analyses are obtained. Firstly, public discourse surrounding EPA is characterised as highly disputative, characterised by varying types of disagreements on different policy issues and limitations in cross-actor engagement. Secondly, the study identifies a challenge in balancing the need for policy adjustments with the urgency of implementing them. This struggle can lead to difficulties in integrating ideas from stakeholders into policy formulation and development, which may hinder the overall progress of policy implementation. Lastly, the research suggests how politics is consequential to the policy implementation of EPA. This phenomenon is captured from the defensives of implementers to

emerging political pressure on implementation—their original involvement in a broad range of policy issues has shifted to one that primarily defends their responsibilities. It is believed that implementers' critical role in influencing policy from the bottom-up is diminished.

Implications

The thesis contributes significantly to understanding policy implementation, highlighting various factors, challenges, and potential threats affecting EPA's implementation. While these findings may not directly aid EPA, they provide valuable guidance when developing similar complex policies in the Netherlands. Policy recommendations were also proposed to identify broad areas of improvement, such as planning the policy process to integrate ideas more effectively and providing more resources to implementers.

Additionally, the research makes a methodological contribution by demonstrating how discourse network analysis can be applied in implementation research. Various extensions and variations are highlighted, which were found to be useful—namely, the novel use of the storyline congruence network to study the changes in the discursive context within a rapidly evolving political process. Future research could explore the potential of discourse network analysis in studying the politics of policy implementation.

Preface

After six intense months of hard work and dedication, I am proud to present my master's thesis, marking the conclusion of my time as a student in the Engineering and Policy Analysis programme at the Faculty of Technology, Policy, and Management. This accomplishment would not have been possible without the unwavering support of many people around me.

First and foremost, I would like to express my deepest gratitude to the Justus & Louise van Effen Foundation for the scholarship that made my two years of study possible. Your generosity granted me the freedom to pursue my academic interests without the weight of financial concerns, and for that, I am immensely grateful.

I am also extremely thankful to my graduation committee for their invaluable guidance and support throughout this journey. The topic and methods I explored were initially unfamiliar to me, and I could not have navigated this challenging path without your encouragement to venture beyond my comfort zone. A special thank you to Lisa Scholten for your continuous inspiration in so many capacities. My interest in implementation, though it has evolved significantly, began with the opportunities you gave me to explore this area. Your sharp comments have always led to weeks of contemplation and reflection for me. Thank you, Nihit Goyal, for your patience in explaining even the simplest concepts until I fully understood them, and for emphasizing the importance of a rigorous process. Your dedication to my growth has been evident, and I greatly appreciate it.

To my parents, words cannot fully express my gratitude for your constant care and support, which have allowed me to dedicate myself entirely to my education and personal growth. I know my unorthodox choices—like leaving my “iron rice bowl” to study in a foreign land—may have caused you worry. Yet, despite your concerns, I know you take immense pride in my hard work and happiness. I feel truly blessed to have your unconditional love and trust.

Lastly, I want to extend my heartfelt thanks to the incredible friends I have made in the Engineering and Policy Analysis programme. Their support, care, and the enriching conversations we have shared have greatly contributed to my intellectual and personal development. These friendships will last a lifetime, and their presence will always be a source of motivation for me.

Thank you all for your incredible support and encouragement.

Ryan Tan
Delft, August 2024

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1 Introduction and Motivation

1.1 Background of EPA

With growing transition challenges in cities such as climate adaptation, circular economy, energy and water transition—the role of public spaces is increasingly important as responses to these challenges require the appropriate physical and social changes in urban settings (Maring & Blauw, 2018).

Traditionally, spatial planning in the Netherlands was built on the “modern rationale”, characterised as top-down, centralised, with a focus on functionality (Gerrits et al., 2012). This approach can lead to institutional fragmentation, where different departments have responsibilities and accountabilities for different aspects of the management and maintenance of public space. There is thus an urgent need to revise the approach towards spatial planning so that the system can respond effectively and cohesively to emerging complex challenges.

The Environment Planning Act: A New System of Spatial Planning

In recent years, a prominent effort in the Dutch planning system is the recently enacted legislation in 2024, the Environment and Planning Act (EPA)¹, or the *Omgevingswet* in Dutch.

EPA, a legal policy instrument, essentially integrates previously separate laws and regulations governing planning and the environment from various sectors such as space, housing, infrastructure, environment, nature and water (Rijksoverheid, 2024). It intends to bundle all rules into one Act, four orders in the council, and one ministerial regulation (Dutch: *Omgevingsregeling*). The overall intention is to make rules for the living environment simpler and more coherent for citizens, companies, and governments (Informatiepunt Leefomgeving, 2021c). The main noticeable change would be the simplification of procedures for authorities and applicants by combining several permits into a single all-encompassing environmental permit.

The introduction of EPA signifies a system revision towards a more integral approach to spatial planning. The current system pushes greater strategic responsibilities towards municipal authorities—and expects them to weigh the interest and functions of the living environment coherently and transparently by transcending the silos of the different sectors when drawing up visions and plans (Kuitert et al., 2022). This requires much coordination and collaboration. Initiators of spatial projects anticipate the municipality to have a flexible and receptive attitude that speaks with a single voice, creating an enabling environment that encourages local initiatives (*ibid*).

¹Translation is given officially by the Ministry of Interior and Kingdom Relations (2021)

1.2 Challenges of Implementing EPA

History of Postponements and Media Escalations

Even though EPA had majority approvals when the bill was approved in the Senate in 2016 (Buitelaar, 2016), the journey in implementing the policy henceforth has not been a smooth one. It was initially planned to be implemented by January 1, 2018, but had been postponed several times due to work on implementation challenges (BZK, 2020, 2021, 2022a). Even in 2022, EPA was formally declared controversial (Dutch: *controversieel*) for one week (Omgevingsweb, 2021). Finally, after at least 6 postponements and 6 years, it came into effect on January 1, 2024 (BZK, 2023).

Outside the formal political arena, there has been growing media coverage of EPA. The policy involved a significant overhaul of the existing system and regulations, causing citizens, private companies, and even government actors to express their concerns, disagreements and criticisms publicly. Some of these public statements include, the undermining of environmental protection standards (Grijpink, 2022), claims of reduced public participation, and failures of the digital infrastructure of EPA (Rutten & Verlaan, 2020).

The Challenge of EPA and the Difficulties in Establishing a “Working Method”

The repeated postponements and policy controversies illustrate the magnitude of change and challenge of implementation that EPA entails. The legislation combines approximately 150 laws and regulations and has been commonly understood as the “biggest change in the law since 1848” (Omgevingsdienst, 2021). The impact of EPA is wide and will affect a large number of actors in different extents and for different reasons.

The growing academic interest in EPA captures the diversity in perspectives on aspects of the policy; studies discuss various concerns and challenges in both the policy formulation as well as implementation, focusing on different tensions between every actor connected in the policy accountability chain, i.e., decision-makers, public administration and citizens.

Some examples include a focus on integration, where the barriers and opportunities for departments to work together in municipalities are investigated (Buijs, 2022; Kuitert et al., 2022; van den Ham, 2020); a focus on facilitation and citizen involvement, where the protection of citizen interest was studied (Drenth, 2019; Haanstra, 2019), and also a focus on decentralisation where power dynamics between levels of governments are looked into (Kuitert et al., 2022).

In essence, these studies describe the difficulties of implementing EPA to be because of a lack of a clear and coherent “working method” (Kuitert et al., 2022, p. 4) or “thinking in spatial planning” (Haanstra, 2019, p. 58) which all actors are agreeable to, whether it is

regarding the digital infrastructures, collaborative arrangements within government authorities or how EPA's core instruments are employed.

1.3 Research Gap and Motivations

Research Gap: Political Process Surrounding EPA and Implementation

Current academic work has made progress in exploring specific issues in the EPA; however, little is known about how the various ideational disagreements, tensions, and concerns influence the implementation of EPA. Does advancing these discussions actually negotiate and shape the policy or the “working method”? What happens if there is an inability to agree on components of the policy? These questions are rather relevant, given the ambiguity in EPA—as evidenced by difficulties in establishing the working method even as the foundations of EPA have been laid. It is anticipated that political factors will affect the policy process, potentially shaping its outcomes and influencing how disagreements and concerns are addressed.

There is generally a lack of a process view on policy implementation to describe how exactly policy is put into practice. Beyond understanding problems and issues, it is also important to study how EPA is being shaped by current political developments, which provides insights tied to the resulting effectiveness and success of the policy. Kuitert et al. (2022) contribute significantly to this perspective by studying the municipal environment where the implementation occurs. It takes a more focused view towards the micro-level factors happening on the ground.

However, an understanding of the dynamics of the broader political environment—beyond the stage of implementation but also the involvement of all actors connected to the policy—is still missing, which is believed to affect EPA greatly.

Motivations to Study the Public Discourse

One promising way to study this political environment is through public discourse (Schaub, 2021; Vogeler et al., 2021) through methods such as Discourse Network Analysis (Leifeld & Haunss, 2012). Policy actors engage in discourse within the public sphere to convey their ideas about a given policy to the general public.

Public discourse is highly consequential on policy outcomes. Actors signal ideas to potential allies, convince other actors to adopt their ideas or learn from other actors. This determines public opinion and is then represented in formal decision-making (Leifeld, 2017) or even results in political pressure that affects implementation behaviour (Sager & Hinterleitner, 2022). Public discourse is also where policy preferences are negotiated.

This arena can be observed through newspaper sources. As actors make public claims about specific aspects of the policy, the media capture this through various means, such as reports of political debates, opinion pieces, and interviews. This results in an arena that plays a key role in the public exchange of ideas where a diverse set of actors can participate. Through the accessibility and richness of newspaper articles, one can carefully examine the evolution of how public discourse is being constructed in hopes of providing some hints as to how it influences the implementation process.

1.4 Conceptual Synergies Between Public Discourse and Implementation

The conceptual synergies justify the use of a discourse approach to study the politics of policy implementation. Much of this will be elaborated based on theoretical ideas found in Section 2, but the key arguments are as follows:

Firstly, policy implementation is a rather incoherent political process involving every actor in the accountability chain and spans beyond the formal stage of implementation (see Section 2.1.1). The approach of discourse analysis will be able to unpack such a political process (see Section 2.2.2).

Secondly, the policy implementation ought to be re-understood better since existing theories have been limited in explaining the process, especially in a changing political environment (see Section 2.1.2). The analysis of discourse could be structured more openly and inductively to align with these descriptive intentions. Studying the interaction between discourse and its context can also capture this political environment in a representative way (see Section 2.2.4).

Finally, the study of policy implementation also seeks to investigate how actors react and respond to it, as this provides knowledge on how it might affect policy outcomes (see Section 2.1.3). The discourse approach has the capacity to study how actors, actor types, or coalitions adjust or readjust in the political process (see Section 2.2.5).

1.5 Aims and Research Questions

The primary aim of this research is to understand the political process of policy implementation better and to provide insights that could be relevant to the policy outcomes. Additionally, the research also aims to provide some methodological insights into ways to analyse the politics of policy implementation effectively.

The main research question (RQ) is formalised below based on the research aims and gaps. Additionally, sub-research questions (SRQs) are also formulated based on the conceptual synergies to guide it.

RQ: What does the public discourse surrounding the Environment and Planning Act (EPA) in the Netherlands reveal about its policy implementation?

- **SRQ1:** How is the public discourse surrounding EPA characterised?
- **SRQ2:** How does the public discourse evolve over the duration of the policy process?
- **SRQ3:** What are the responses of actors in this changing public discourse?

1.6 Relevance of Research

Societal Significance

Since EPA has already been formally introduced at the time of writing, the insights from this research may not contribute to the eventual success or effectiveness of EPA itself. However, the Netherlands is likely to experience more policy changes in the future. Insights from this research on the politics of implementation can provide considerations for the planning and execution of future policy processes. Additionally, these insights can benefit cases outside the Netherlands—those of similar social and political contexts or policies with similar scale or intention, offering learning opportunities.

Academic Relevance

This research also contributes to two schools of literature: implementation research and discourse analysis. In implementation research, there has been a recent shift towards a "third generation of implementation research" (Sager & Hinterleitner, 2022, p. 5), which focuses more on understanding the implementation process rather than promoting theory-driven claims. They also assert that there is still a lack of a "comprehensive picture of when and how public administration responds to political pressure and how their responses affect policy implementation". This research directly adds to this research gap and body of knowledge by providing empirical insights on the influence of public discourse surrounding EPA on policy implementation.

The discourse approach chosen (elaborated in Section 4), i.e. discourse network analysis, was originally used to explain more formal decision-making processes (Leifeld & Haunss, 2012; Leifeld, 2013). However, there has been a rise of exploratory applications such as a discourse approach that can describe other phenomena such as multi-sectoral transitions (Ohlendorf et al., 2023), technological legitimacies (Markard et al., 2021) or public understanding of solidarity (Ohlendorf et al., 2023; Wallaschek et al., 2020). This research contributes to this expanding field by exploring more use cases of discourse network analysis and potentially offering methodological insights into policy implementation.

1.7 Alignment with the Engineering and Policy Analysis Masters'

This research aligns closely with the analytical nature of the Engineering and Policy Analysis program—Involving systems and multi-actor perspectives essential for understanding policy processes. Core methods taught in the Master's program, such as social network analysis and data science techniques, have been systematically applied and further developed to suit the demands of the thesis.

This research supports efforts in the Netherlands towards addressing Grand Challenges (in this case, the revision of the spatial planning system for transition challenges) by providing insights into governance and policy implementation that significantly impact policy outcomes. This research is highly relevant to the public domain, offering a deeper understanding of the political process of implementation and integrating some of these insights into future policy processes. It also holds potential value for citizens and private organisations, recognising their roles within the governance system and their contributions to the political process.

2 Theoretical Framework

The main outcome of this section is to explore the theoretical perspectives of the **politics of policy implementation** in Section 2.1 and the **discourse and discourse analysis** in Section 2.2. This will help in scoping an analytical framework, which will be discussed in Section 4.1.

2.1 Theoretical Background: Politics of Policy Implementation

2.1.1 Characterising Policy Implementation

Policy Implementation

According to Mthethwa (2012), policy implementation refers to “the mechanisms, resources, and relationships that link policies to programme action” (p. 37). Adopted policies are seldom implemented as envisioned and do not often achieve the intended results (Alesch & Petak, 2001); analysing implementation is needed to comprehend why this occurs.

Studying Implementation as a Process

Policy implementation should be seen as part of the broader policy process—it “follows a decision on how to solve a problem and is when the relevant authorities are called on to put the agreed-upon policy into practice” (Sager & Hinterleitner, 2022). Essentially, it bridges the gap between policy formulation and tangible outcomes, thereby operationalising policy objectives.

However, implementation is not a linear process. Scholars have characterised the policy implementation process in various ways: fragmented and interrupted (Walt & Gilson, 1994), multi- and cross-institutional (McLaughlin, 1987), complex, interactive and continuously evolving (Björkman, 1994). It is unavoidable that implementation can be incoherent due to its political nature in which motivation, flow of information, and balance of power and resources from various stakeholders can influence implementation (Bressers, 2004).

A process perspective is needed for a more holistic understanding where important process factors such as barriers can be illuminated. A practical way to consider implementation is to study the extent and form in which activities have been carried out and the nature of issues arising during implementation (Love, 2003).

2.1.2 Capturing the Process of Implementation

Analysing the process of implementation is tricky since there are different analytical starting points for studying the process of implementation (Goggin et al., 1990; Sager &

Hinterleitner, 2022). Traditionally, there are two opposing models of analysis of implementation—a top-down and bottom-up approach, both of which also imply an underlying view of success.

The top-down approach refers to the view of the implementation of a law or a policy programme from the perspective of decision-makers. It generally emphasises the ability of the implementer to adhere to the policymaker's policy decisions. Overall, there is a control focus that examines whether implementers are consistent with the goals and purpose of the policy decision. Some examples would be frameworks by Sabatier and Mazmanian (1980).

On the other hand, the bottom-up approach starts from the view of the actors contributing to the implementation. The approach generally aims to understand the institutional context at the lowest level of government, where it assumes that implementation can only be understood here (Lipsky, 1980; Matland, 1995). The central focus differs from one of control to one of creation, where bottom-up influences and discretion create opportunities for the implementation process. One example is Lipsky's (1980) theory of street-level bureaucracy.

There has also been an emergence of hybrid theories that aim to bridge top-down and bottom-up approaches. It moves away from proving a theory-driven claim but rather aims to understand the politics of implementation (Goggin et al., 1990). This has been useful in the context of democratic policy systems, where policy implementation can have both top-down and bottom-up influences; all actors contribute—decision-makers, implementers, and stakeholders—to bargain, exchange, and negotiate action. It is an ongoing process with compromising inputs from the top and innovations from the bottom (Jordan, 1995, p. 15).

This approach can be rather applicable to the Dutch governance system, where both top-down and bottom-up are often present in the implementation process. Jaffe and Koster (2019) gave examples where forms of informality, such as strategic non-enforcement, were intentionally given by decision-makers to allow implementers to use their discretion to enhance the effectiveness and efficiency of certain policies.

2.1.3 Influence of Politics on Policy Implementation

All in all, the relevance of hybrid theories shows increasing acceptance that policy implementation is indeed a highly political process, and politics play a core role both at the decision-making level and implementation level (Sager & Thomann, 2017).

Sager and Hinterleitner (2022) stress the importance of understanding the existing political context in which implementation takes place to understand the consequences of policy implementation. They additionally argue about the rise of conflictual politics that puts stress on implementers and makes the policy implementation process more demanding. Some examples include how public administration tends to be a centre of

policy controversies even though much of the developments are attributed to poor policy formulation or resource gaps, which is not the responsibility of implementing agents (Boin et al., 2009; Hinterleitner & Sager, 2015).

More importantly, they also suggest that such politics permeates various levels of public administration and policy implementation as actors respond to them. This is largely explainable by the accountability chain that connects citizens to politicians and politicians to public administration (Olsen, 2016). A wide range of cases document this. For instance, street-level bureaucrats, actors at the end of the accountability chain, tend to adapt to conflictual politics because of their considerable discretion and autonomy (Thomann et al., 2018). In another example, implementers refrain from strictly enforcing a law because of electoral concerns (Holland, 2016).

Sager and Hinterleitner (2022) also highlight the research gap, namely that implementation research is dominated by micro-level analysis and knowledge of the political environment's influence on actors is limited. There is a need to conceptualise political pressures at all levels of the accountability chain better and have a "comprehensive idea of when and how public administration respond to political pressure and how their responses affect policy implementation" (p. 5).

2.2 Theoretical Background: Discourse and Discourse Analysis

2.2.1 Political Nature of Discourse

Based on Hajer's (2006) discourse analysis, discourse is defined "as an ensemble of ideas, concepts, and categories through which meaning is given to social and physical phenomena, and which is produced and reproduced through an identifiable set of practices" (p. 67).

The relevance of studying discourse starts from the theoretical assumption that all actions, objects, and practices are socially meaningful and that these meanings are shaped by the social and political struggles in specific historical periods' (Fischer, 2003, p. 73; Nagel & Satoh, 2019). When actors talk in public, they convey meaning, shape categories, and (co-)create expectations—especially through public media, they often pursue specific interests such as mobilising policy support or influencing perceived legitimacy (Ohlendorf et al., 2023). Public debates are inherently political, and by analysing argumentative structures of discourse, one can draw insights into the underlying politics (Hajer, 2006).

The central concept of analysing discourse is the storyline which is created as "condensed statement[s] summarising complex narratives, used by people as 'short hand' in discussions" (Hajer, 2006, p. 69). Storylines are influential as actors tend to reduce complexities of issues to such simplified forms—and by referring to a storyline,

actors can assume that the complex arguments behind it are understood (Hajer & Versteeg, 2005, p. 177).

2.2.2 Approaches to Discourse Analysis

Discourse analysis can be broadly categorised into two main approaches: 1) language-in-use approach and 2) socio-political approach (Gee, 2010). The language-in-use approach focuses on how technical details of the language are used and manipulated in social contexts, while the socio-political approach focuses on the content of what is being said, investigating how such language constructs and sustains power in society.

Additionally, further clarifications of what discourse analysis is with respect to the broader realm of interpretive methods can be seen in Appendix A.

Motivating the Socio-political Approach Towards Discourse Analysis

Based on the motivations established in this thesis (see Section 1.3), understanding the politics that influence implementation is the focus of discourse analysis. Given that the political nature of discourse in the public sphere is driven primarily by condensed forms of ideational content (i.e. storylines), the socio-political approach will be more applicable.

Below, the theories and concepts that are more relevant to the socio-political approach will be explored.

2.2.3 Analysing Discourse for Policies

Discourse analysis aims to "explore the relationship between discourse and reality, interpret a hidden meaning, and mediate it between the past and present" (Bondarouk & Ruel, 2004).

Discourse analysis can be particularly useful for understanding policy development when issues can be highly complex and uncertain (Bradford, 2016) or when pathways are still being shaped (Rosenbloom et al., 2016). In other words, ideas play an important role in shaping policy pathways through "motivating collective action, channelling policy resources, and shaping prospects for collaboration" (Bradford, 2016, p. 659).

According to Argumentative Discourse Analysis (Hajer, 1993) and Discursive Institutionalism (Schmidt, 2008), this is manifested through a political process of discursive construction. Different groups of actors involved in decisions have different underlying ideas and perceptions that take discursive shape and, through argumentation, struggle over discursive hegemony between conflicting discourse coalitions as a means to influence the policy.

2.2.4 Studying the Context of Discourse

Apart from the discourse itself, the study of the context in which discourse takes place must also be taken into consideration to interpret these meanings more accurately (Song, 2010). Discursive context, in the broad sense, refers to “(knowledge of) these factors and to (knowledge of) other parts of the text under consideration” (Song, 2010, p. 876). The discourse elaborates its context, and conversely, the context helps interpret the meaning of statements in discourse.

Song's review classifies context theories such as linguistic, situational and cultural contexts. The situational context is the most relevant to the socio-political approach of discourse analysis, which observes the environment, time, and place in which the discourse occurs and clarifies the relationship between actors. An example of how the situational context is used is by highlighting how choices of statements are affected not only by the topic of communication but also by the relationships of ideas in which the discourse is taking place.

2.2.5 Studying the Structures of Discourse

Storylines: Cluster of Concepts

Storylines, constructed in the discursive process, are inherently structural in nature. This condensed form is effectively made of concepts that selectively punctuate and encode objects, situations, events, experiences, and sequences of actions within one's present or past environment to build up shared interpretations or “frames” (Snow & Benford, 1992). These concepts could have diagnostic, prognostic, and motivational functions to define the problem, offer solutions, and describe ways to arrive at the solution (Benford & Snow, 2000). Successful “frames” in political mobilisation often combine these three functions.

Coalitions: Cluster of Actors

In public discourse, actors do not only function individually but also in coalitions. According to Hager (1993), a discourse coalition is defined as a "group of actors who share a social construct" (p. 45) and attempt to influence policy processes by imposing their perspectives on others. These social constructs are essentially the shared interpretations represented in storylines, where they structure individual and collective action (Leifeld & Haunss, 2012).

The discourse space often comprises several discourse coalitions. If a discourse coalition intends to be successful, it has to dominate the public discourse and will thus be reflected by institutional practices in the political domain (Hager, 1993, p. 48). The dominant coalition can be observed prominently in the media, where it can integrate its core frames more consistently into a storyline than its opponents (Leifeld & Haunss, 2012).

The discourse coalitions are often dynamic, and there will be much realignment and regrouping of the frames and coalitions. However, coalitions succeed when their members maintain a high level of ideational congruence, which means it will be more beneficial for actors to share common arguments over diverse coalitions (Leifeld & Haunss, 2012).

2.2.6 Key Elements of a Discourse Analytical Framework

Based on the prior sub-subsections, the key elements of discourse can be summarised below.

Substantive Layer: Storyline

In the socio-political approach to discourse analysis, there is greater interest in the macro-level implications of language than micro-level linguistics. As such, the basic unit of analysis would be a condensed form of ideational content—a "storyline" that represents a concise frame of the policy. Identifying these frames provides a means to acknowledge the diversity of beliefs, preferences and justifications from the actors involved in the policy.

Having such a condensed form of language also provides the potential to capture relational aspects of discourse since it is possible to link statements from multiple actors to this storyline and even qualify if they are in agreement or disagreement with it.

Relational Layer: Discursive Context

The context of discourse includes a relational layer of existing storylines that shapes the environment upon which subsequent storylines build. Analysing this context not only aids in better interpreting the meanings behind individual storylines but also potentially helps in characterizing the broader discourse space.

Relational Layer: Coalitions

Coalition forming, whether conceptualised as an advocacy coalition or discourse coalition, is another central theoretical mechanism that explains power struggles in influencing policy decisions, which is important for studying implementation challenges. Simply, coalitions are an expression of a cluster of actors that are ideationally congruent—that share similar beliefs (according to the Advocacy Coalition Framework) or shared interpretations (according to Argumentative Discourse Analysis). Analysing coalitions allows for an evaluation of the overall level of cooperation and conflict within the system, revealing the polarisation among actors (Leifeld, 2017).

Temporal Dimension: Evolution of Coalitions and Context

Coalitions can be dynamic and can evolve based on interactions in the public debate and real-world events. Tracing the movement of coalitions through actors' adjustments in storylines or shifts in ideational alignments can be crucial to understanding

fluctuations in the policy process. It can potentially explain empirical observations in policy implementation challenges.

3 Policy Components and Legislative Process

Section 3.1 attempts to systematically deconstruct the **policy components** of EPA; this contextual information is useful to accurately represent and identify storylines as part of the coding process. Section 3.2 then explores the general **legislative process** in the Netherlands; this helps understand the policy process of EPA better.

3.1 Framework for Policy Components

To accurately describe ideational content towards EPA in public claims, a versatile conceptual framework is introduced that helps disaggregate the different elements of the policy. A taxonomy of policy components by Howlett and Cashore (2009) is chosen. Simply, it looks at a policy with the dimension of policy focus (i.e. means or ends) and the dimension of policy content (i.e. high abstraction, programme-level operationalisation, on-the-ground measures).

Some of these policy components can be framed more concretely than others; for instance, goals and objectives are formally written as part of the legislative documents and are simple to identify. However, instrument logic could be difficult to grasp as it could have varying interpretations depending on the choice of sources. Hence, the identification of policy components will come from a mix of official government sources (e.g. legislative documents, pamphlets, and government websites) and secondary sources (e.g. academic articles and information websites).

Table 1 presents a 2 by 3 matrix of policy components and summarises the key points of each component contextualised to EPA.

Table 1. Summary of EPA based on Howlett and Cashore's (2009) Taxonomy of Policy Components

| | | Policy Content | | |
|--------------|-------------|---------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| | | High-Level Abstraction | Programme Level Operationalisation | Specific On-the-Ground Measures |
| Policy Focus | Policy Ends | Goals | Objectives | Settings |
| | | 1) Ensure sustainable development 2) Maintain safety and health of the physical environment 3) Effective Management | 1) Insightful Environmental Law 2) Living Environment as the Centre 3) Space for Customisation 4) Faster and Better Decision Making | 1) User Experience of Initiators 2) Integrative Decision-Making Process of Authorities |

| Policy Means | Instrument Logic “Decentralised, unless” | Mechanisms (6 Core Instruments) 1) Environmental Vision 2) Program 3) Decentralised Rules 4) General Government Regulation 5) Environmental Permit 6) Project Decision | Calibration (Implementation of 6 Official Instruments at different levels of governance) |
|---------------------|----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
|---------------------|----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|

3.1.1 High-Level Abstraction

Goals (Policy Ends): What General Type of Ideas Govern Policy Development?

According to Article 1.3 of EPA, the high-level abstracted goals are described as “ensuring sustainable development, the habitability of the land and to protecting and enhancing this environment: a) “to achieve and maintain a safe and healthy physical environment and good environmental quality, also because of the intrinsic value of the natural world, b) and to effectively manage, use and develop the physical environment in order to fulfil societal needs.” (Ministry of the Interior and Kingdom Relations, 2021, p. 13).

Instrumental Logic (Policy Means): What general norms guide implementation preferences?

The legislation of EPA is built based on the subsidiarity principle “decentralised, unless” (Dutch: “*decentraal, tenzij*”), which ensures by default that local authorities are responsible for the general care of the physical environment unless additional circumstances emerge, such as the inability manage with interests at provincial or national level or legislations and international law obligates necessitates tasks for the provincial or national governments (Informatiepunt Leefomgeving, 2021d).

As such, EPA intends to decrease the national government's role in spatial planning and give municipalities and water boards the core leadership based on this subsidiarity principle as well as the acknowledgement of local expertise (Haanstra, 2019).

The Instrument Logic of EPA has also been framed in other ways, such as moving from a ‘no, unless’ to a ‘yes, provided’ principle (KWR, n.d.), “principle of municipal control” (Grijpink, 2022) or a “market-based approach” (Friesch Dagblad, 2021). Generally, they are all different lenses referring to the same idea of providing deliberation space in spatial planning to decentralised governments.

3.1.2 Programme Level Operationalisation

Objectives (Policy Ends): *What does policy formally aim to address?*

The programme-level objectives are best summarised by the “4 Improvements” (Informatiepunt Leefomgeving, 2021g).

Firstly, "insightful environmental law" aims to transition the system from a tangle of rules to a transparent and predictable system that is easy to use.

Secondly, "living environment as the centre" focuses on shifting from a sectoral to a coherent approach to the living environment in policy, decision-making, and regulations.

Thirdly, "space for customisation" emphasises granting local authorities more room for area-specific customisation and allowing them to make their assessments.

Lastly, "faster and better decision making" aims to enable faster and more efficient assessment of projects in the physical environment (*ibid*).

Mechanisms (Policy Ends): *What specific types of instruments are utilised?*

6 Core Instruments

There are 6 official core instruments under EPA (Informatiepunt Leefomgeving, 2021b)—the Environmental Vision, Program, Decentralised Rules, General Government Regulation, Environmental Permit, and Project Decision. They contribute in various ways to achieving an integral approach within local authorities at different stages of the policy cycle, i.e. Policy Development, Policy Implementation, Program Implementation, and Feedback (Dutch: *Beleidsontwikkeling, Beleidsdoorwerking, Uitvoering, Terugkoppeling*) (Informatiepunt Leefomgeving, 2021a). The Environmental Vision contributes to the *Policy Development* stage by establishing coherent strategic focuses; the Program contributes to the *Policy Implementation* by defining concrete measures that establish the desired quality of the physical environment from various sectoral interests; Decentralised Rules, Environmental Permits, and Project Decisions contribute to the *Program Implementation* by providing means to managing initiatives by citizens and companies.

Digital Infrastructure

The main means by which the 6 official instruments are operationalised on the ground is through the Digital System for the Environment and Planning Act (Dutch: *Digitaal Stelsel Omgevingswet (DSO)*). The DSO is essentially the digital infrastructure that supports the implementation of all the instruments, which is designed to “designed to make information available about the physical environment, facilitate electronic traffic, and to promote an efficient and effective performance of duties and powers under this Act” (Ministry of the Interior and Kingdom Relations, 2021, p. 177).

An aspect of the DSO is also the Environmental Desk (Dutch: *Omgevingsloket*), which interfaces directly with the residents and companies through the single platform. The platform contains all relevant content, such as spatial information, rules and policy details, etc., and carries functions like assessing the need for permits, planning reports, application of permits and consultation requests (Informatiepunt Leefomgeving, 2021e).

3.1.3 Specific On-The-Ground Measures

Settings (Policy Means): *What are the specific on-the-ground requirements of policy?*

There are expectations on how EPA should be experienced on the ground, and they have outlined for both initiators and authorities:

For initiators, the target user experience is outlined by Informatiepunt Leefomgeving (2021e), which is where residents and companies can approach a single front-facing counter to manage all activities for their initiatives. These initiators can expect a flexible and receptive attitude from the municipality that speaks with one voice, offers space for local initiatives, and actively enables them instead of hindering them, as assessed by a compartmentalised organisation (Kuitert et al., 2022).

For government authorities, EPA essentially mandates municipalities to adopt a more integrated approach to strategy and operations within their internal working processes. Informatiepunt Leefomgeving (2021e) also describes various changes to spatial planning and the decision-making processes:

Firstly, municipalities no longer need to record every detail in their environmental plans, granting residents and companies more flexibility to develop their plans. Additionally, the act allows municipalities to tailor rules to local preferences and circumstances, facilitating customised solutions. The government adopts a coherent approach to the living environment, simultaneously considering themes such as energy, sustainability, and social effects. Furthermore, the Environmental Act streamlines the government's decision-making process on applications, ensuring quicker outcomes. Greater mutual trust is intended to be established between the government and initiators, as well as within the government. Moreover, the government ought to encourage participation from residents and workers in an area, providing space for innovative ideas to flourish. Finally, municipalities should have a more collaborative and transparent planning process where they guide initiators on rule compliance and advice on adjustments.

Calibrations (Policy Ends): *What are the specific ways in which the instrument is used?*

Each of the core EPA instruments is adopted at each level of government differently. Table 2 provides a summary of how they are applied.

*Table 2. Summary of the involvement of each government level on the respective instruments
translated from (Informatiepunt Leefomgeving, 2021b)*

| | Municipality | Province | National | Waterboard |
|---------------------------------|----------------------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------|-----------------------------------------------------|
| Environmental Vision | Municipal Environmental Vision | Province Environmental Vision | National Environmental Vision | |
| Program | Action Plan (+ non-mandatory programs) | Action Plans, Water Program, Management Plan (+ non-mandatory programs) | Action Plans, Water Program, Spatial Plan (+ non-mandatory programs) | Water Management Program (+ non-mandatory programs) |
| Decentralised Rules | Environmental Plan | Environmental Regulation | | Water Board Regulation |
| General Govt Regulations | | | Act, Bal, Bbl, Bkl, Environmental Decree, Environmental Regulation | |
| Environmental Permit | Environmental Permit | Environmental Permit | Environmental Permit | Environmental Permit |
| Project Decision | | Project Decision | Project Decision | Project Decision |

Below, further descriptions of each core instrument are given, and how they are applied at each level are elaborated on.

Environmental Vision (Dutch: *Omgevings-visie*). It is the central instrument that mandates a coherent strategic plan for the living environment, which takes into account all types of development in an area.

Calibration: The National, Provincial, and Municipal governments each establish an environmental vision for their entire territory. EPA prescribes some steps on how to draw up each vision, but generally, it is trusted to be up to the discretion of each government (Informatiepunt Leefomgeving, 2021h).

Program (Dutch: *Programma*). The program is a flexible instrument that contains measures for the different stages of the policy cycle of EPA. Firstly, in policy development, the environmental vision must be established collaboratively at the different levels of government; next, in policy implementation, the vision has to be translated into concrete implementation strategies; lastly, in program implementation, measures must be incorporated into the program actively such as using frameworks to seek alignment with the environmental vision. Overall, this instrument is considered to be implementation-oriented.

Calibration: Existing statutory and non-statutory plans at every level of government, such as the municipal sewerage program, noise action plan, and water management program, are assumed under this core instrument plan (Pont Omgeving, 2024). The

program also includes mandatory and non-mandatory types, with the latter being the more common category. Some mandatory programs are due to other legislation, such as the European Environmental Noise Directive, which mandates that municipalities establish an action plan to manage noise sources.

Decentralised Rules (Dutch: *Decentrale Regels*). They contain various rules for the activities of citizens and companies, as well as frameworks for assessing environmental permits.

Calibration: Each “decentralised” authority, i.e., the municipality, province, and water board, has one regulation for the physical environment in their territory.

General Government Regulation (Dutch: *Algemene Rijksregel*). This contains the rules necessary for the operation of EPA. They form the basis for the instruments, tasks, and powers of the governments but also contain the standards for the quality of the living environment.

Calibration: EPA is the most important system of legislation and regulations, but other theme-specific regulations are necessary for the operation of EPA, such as the Crisis and Recovery Act (Chw) and Construction Quality Assurance Act (Wkb).

Environmental Permit (Dutch: *Omgevings-vergunning*). Citizens, companies, and governments can request permission to carry out initiatives in the physical environment by applying for an environmental permit.

Calibration: EPA makes it easier and faster to apply for permits, where there is only one application at one counter with one consequent decision. This application will be assessed based on the rules and plans set by all municipal, provincial, water authorities, and national governments.

Project Decision (Dutch: *Project-besluit*). This instrument is a uniform procedure for the province, national government, and waterboard to enable decision-making on complex projects that have a public interest. This procedure regulates any deviation from the environmental plan. The project decision can also apply as an environmental permit.

Calibration: Municipalities cannot apply for the project decision; instead, they can change the environmental plan if they desire to propose a project. The minister, the Provincial Executive, and the executive board of a water board can potentially be the competent authority for the procedure. The procedure consists of the following steps: notice of intention, notification of participation, reconnaissance, preference decision, and finally, project decision (Informatiepunt Leefomgeving, 2021f).

3.2 Overview of the Legislative Process of a Policy

The Overheid (2024) presents a detailed description of the general legislative process of a policy in the Netherlands. This provides a broader understanding of EPA process.

When is Legislation necessary for Policy?

Legislation in the Netherlands often begins as a response to societal issues that require government action. These issues can be brought to the political agenda by a wide range of stakeholders, including political parties, citizens, interest groups, and experts.

However, not all policies are translated into formal legislation. While some sectors, such as taxation and social security, demand extensive legal frameworks, others, like foreign relations, may involve limited legislative action. Significant policy shifts that do not require new laws are often communicated to the House of Representatives (Dutch: *Tweede Kamer*) through policy documents rather than through new legislation. The development of such policies typically involves extensive consultation with stakeholders, including research institutes, advisory bodies, and other ministries—to ensure that the policies are well-informed and cohesive, even in the absence of formal legislative processes.

The Legislative Process

If legal interventions are indeed deemed necessary, a legislative process will occur, and an Act will go through several stages before it becomes introduced as a law. These stages are as follows.

- **Making Plans.** The process begins with initial planning and consultation, where the need for legislation is identified, and the scope and objectives are clearly defined. This stage often involves gathering input from a wide range of stakeholders, including experts, interest groups, and the public, to ensure the proposed legislation addresses the relevant issues comprehensively.
- **Drafting a Bill.** Once the initial planning is complete, the responsible ministry begins the meticulous process of drafting the bill. At the start, ministry officials often conduct thorough research, consulting public and private research institutes, advisory committees, and interest groups. In some cases, public debates are held to gauge public opinion. Additionally, other ministries are consulted to ensure that the bill aligns with broader government policies. This draft is accompanied by an explanatory memorandum that outlines the rationale behind the proposed legislation, the objectives it aims to achieve, and the potential impacts. The document provides a clear foundation for subsequent discussions and evaluations.
- **Advice from the Council of State.** The draft bill is then reviewed by the Council of State (Dutch: *Raad van State*), an independent advisory body that plays a

crucial role in the legislative process. The Council of State examines the bill for its legal soundness, practicality, and alignment with existing laws. Based on its review, the Council may recommend amendments, which the responsible ministry can choose to incorporate before the bill proceeds.

- **Passage through the House of Representatives.** The bill is introduced to the House of Representatives, where it undergoes detailed scrutiny. The House's permanent committees review the bill and issue reports, to which the government responds. The bill is then debated in plenary sessions, where members of the House may propose amendments. This stage is pivotal, as it involves intense discussion and negotiation to refine the bill and ensure it meets the needs of the broader society.
- **Passage through the Senate.** After the bill is approved by the House of Representatives, it moves to the Senate (Dutch: *Eerste Kamer*) for further debate. Unlike the House, the Senate cannot amend the bill; it can only approve or reject it in its entirety. The Senate's role is to provide a final check on the bill, ensuring that it is sound, necessary, and in the best interest of the country.
- **Assent.** Once both houses of Parliament have approved the bill, it is sent to the monarch for royal assent. The monarch's signature, along with that of the responsible minister, formally enacts the bill as an Act of Parliament. This stage marks the official transition from a legislative proposal to a law.
- **Publication.** The final step in the legislative process is the publication of the Act in the Bulletin of Acts and Decrees (Dutch: *Staatsblad*). This publication marks the official entry into force of the law, making it binding and enforceable. The Act is now part of the Dutch legal system and is accessible to the public, ensuring transparency and accountability.

Implementation and Oversight

Once an Act is passed, its implementation often requires detailed regulations issued by the relevant ministries. These regulations, which may grant specific powers like issuing licenses, ensure that the law is effectively enforced. Additionally, democratic oversight mechanisms, such as inquiries by the States General and audits by the Court of Audit, play a crucial role in monitoring the implementation and impact of the legislation. The National Ombudsman also investigates complaints from citizens about government actions, providing further checks and balances within the system. This oversight ensures that the laws and their application align with the intended policy goals and reflect the needs and values of society.

4 Methods

First, Section 4.1 outlines the analytical framework, which is then operationalised in Section 4.2 through a discourse network analysis approach that addresses SRQ1, SRQ2, and SRQ3. Sections 4.3 to 4.6 detail the modelling process and its individual steps, while Sections 4.7 and 4.8 describe the analysis steps.

4.1 Analytical Framework

This analytical framework is designed to explore the politics of policy implementation through the lens of discourse. It establishes the connections between key discourse elements, showing how ideational content, actor relationships, and storyline relations shape the evolution of public discourse over time. This is visualised in Figure 1.

Additionally, various literature are reviewed to draw some inspiration as to how these elements are operationalised, and they can be found in Appendix B.

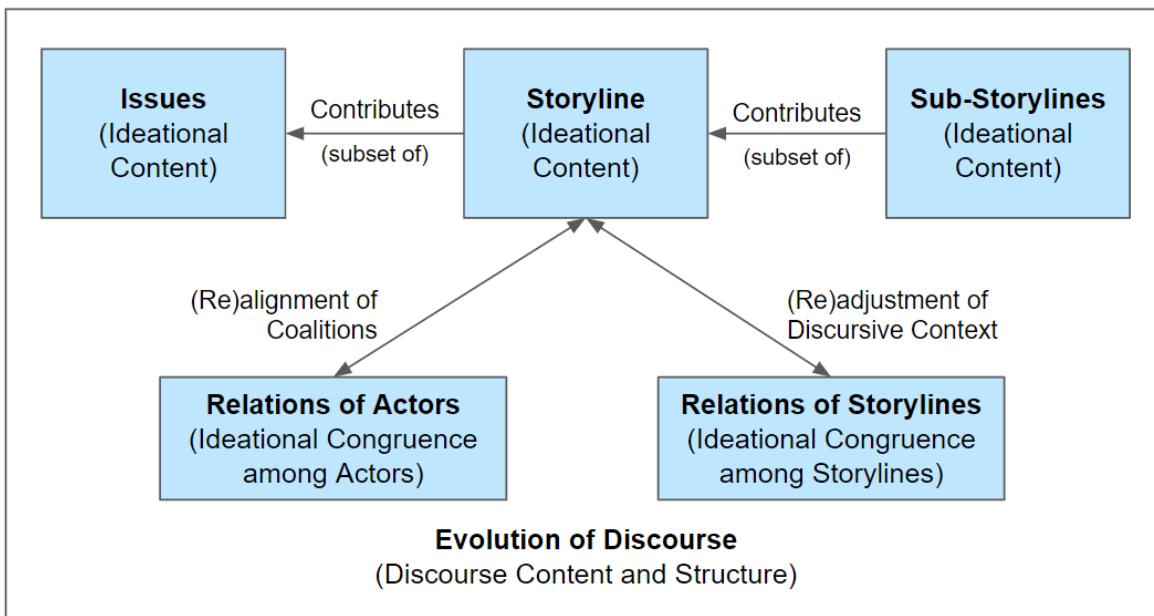


Figure 1. Diagram shows the Analytical Framework where key discourse elements are linked. Double-headed arrows imply an iterative process of discursive construction—ideational content influences relations of actors and storylines, influencing succeeding ideational content.

Issues, Storylines and Sub-Storylines: Ideational Content

Statements collected from the public sphere can provide insight into the political environment by reflecting its ideational content. The primary unit of analysis is the storyline, which represents a condensed frame of a policy issue. To enhance the descriptive richness of these statements, they can be coded at additional levels of

abstraction: *issues* and *sub-storylines*. Overall, sub-storyline labels are elements of the set of storyline labels, which are themselves elements of the larger set of issues.

For example, a *storyline* like "decentralisation strategy is necessary" captures a specific policy stance. At a higher level, *issues* group these non-neutral storylines by topic; in this case, the broader debate might centre around "decentralization versus centralization." This categorisation helps illustrate the range of positions within a particular topic. Conversely, *sub-storylines* add contextual detail, such as "decentralization is necessary for efficient planning," which offers reasons for supporting the original storyline. This categorisation provides a more nuanced interpretation of the storyline.

Relations of Storylines: Discursive Context

Identifying the discursive context helps interpret the storyline better since it cannot be assumed static. For instance, the same storyline regarding policy effectiveness could be used contextually as an expression of scepticism, policy preference, or even empirical understanding, depending on when it is used. Conversely, storylines also clarify and characterise the discursive context; identifying other storylines used alongside a storyline tells us what the existing discourse space is.

Relations of Actors: Alignments of Coalitions

Coalitions could tell us how political influence accumulates or dissipates through groups of actors. In public discourse, coalitions are identified from groups of actors who are ideationally congruent or employ the same storylines. Additionally, understanding the positions of actors and actor types within coalition structures can inform us about their roles in the construction of public discourse.

Evolution of Discourse

Understanding public discourse as a dynamic process is important, as shifts in coalitions and contexts provide valuable insights into the ongoing developments within the policy. More importantly, this perspective helps to illuminate how actors respond to and behave in relation to these changes in public discourse—which could possibly describe how the implementation EPA is being influenced.

4.2 Discourse Network Analysis Approach

The methodology that best serves the context and the analysis of discourse would be Discourse Network Analysis (DNA) (Leifeld & Haunss, 2012). This is primarily due to its ability to systematically capture the discourse of large public debates over time on both a substantive (storylines) and a relational layer (discursive interactions). Discourse

network analysis achieves this through content analysis and network analysis, respectively.

Figure 2 illustrates the overall research approach, distinguishing between the modelling and analysis steps. The modelling and analysis steps corresponding to each sub-research question are described below.

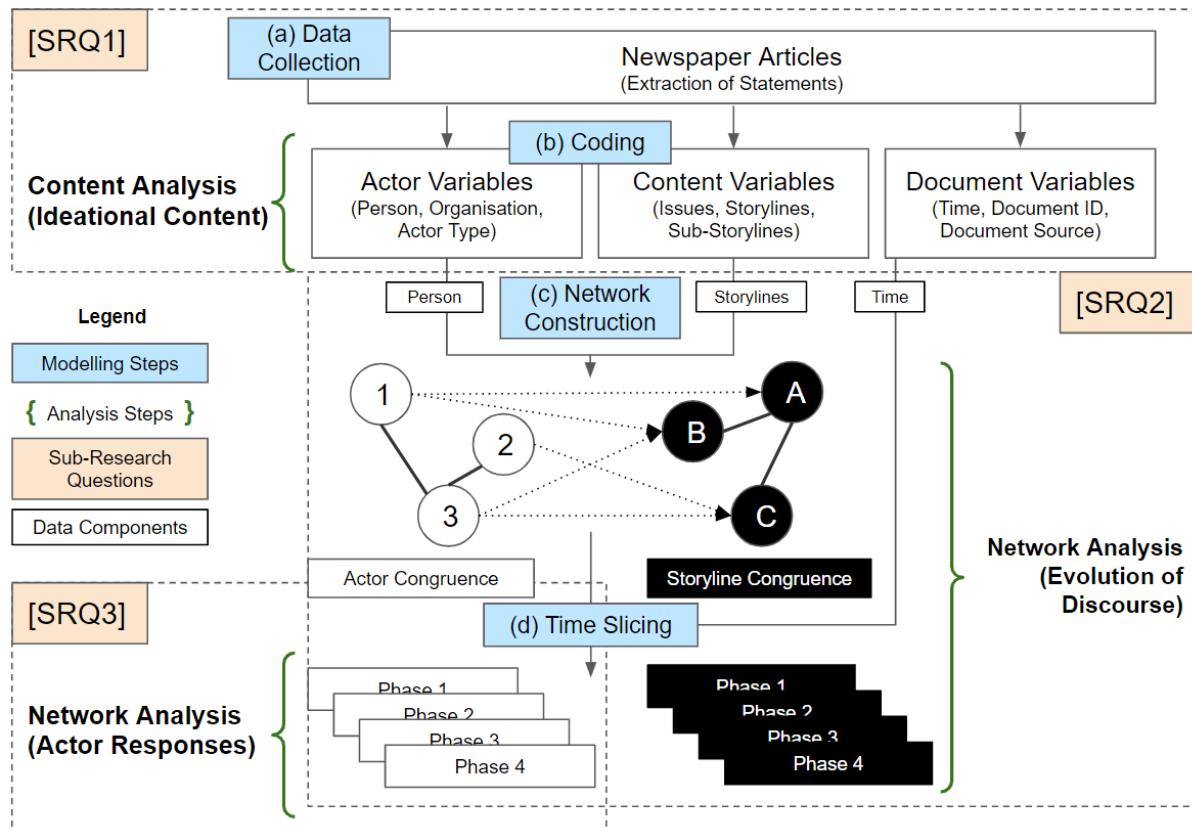


Figure 2. Diagram illustrating the overall Discourse Network Analysis approach showing the modelling and analysis steps. The modelling steps are labelled in blue and numbered from (a) to (d), while green curly brackets indicate the analysis steps. The sub-research questions related to the modelling and analysis steps are presented in dotted boxes.

SRQ1: How is the public discourse surrounding EPA characterised?

Data Collection and Coding (a, b)

SRQ1 focuses mainly on identifying ideational content within the public discourse. This is done by systematically investigating statements and texts from newspaper articles. The actor, content and document variables can be derived from a single statement. Document variables can be labelled directly from the article metadata. However, content and actor variables require a more extensive coding process to determine the labels used for the statement. This is detailed in Section 4.3 and Section 4.4.

Content Analysis

Content analysis can be very flexible and involve any qualitative and quantitative techniques. An exploratory analysis will first be conducted to find broad patterns and underlying structures within the dataset. Next, a substantive analysis will be employed to explore the different content layers within discourse. A temporal and actor analysis will also be used to study the ideational content with respect to actors and time. Specific techniques of choice are elaborated in Section 4.7.

SRQ2: How does the public discourse evolve over the duration of the policy process?

Network Construction and Time Slicing (c, d)

SRQ2 intends to study how public discourse evolves relationally over time. Various discourse networks can be generated, but typically, an affiliation network, the full representation of all ideational links between actors and storyline, is first constructed before being manipulated to create other networks (Leifeld et al., 2019). Section 4.5 details this further.

Time slicing is also commonly required as part of discourse networks to study it dynamically (Leifeld & Haunss, 2012; Markard et al., 2021). Analysis by monthly or yearly intervals is not feasible since sufficient quantities of statements must be required before a discourse network can reveal its structure. Hence, the dataset will be sliced into phases for analysis. Section 4.6 explores suitable delineations for these phases.

Network Analysis (Evolution of Discourse)

The storyline congruence and actor congruence networks are generated to study the relations of storylines (discursive context) and relations of actors (coalitions), respectively. Note that the storyline congruence network is a variation of the concept congruence network originally employed by Leifeld & Haunss (2012). It proposes to study ideational content on the “storyline” level because of its relevance in studying the discursive context. Specific techniques are elaborated in Section 4.8.

SRQ3: What are the responses of actors in this changing public discourse?

Network Analysis (Actor Responses)

Identifying actor responses to changes in public discourse necessitates a more "meso-level" analysis of the actor congruence network. Instead of focusing solely on "macro" structural changes (like in the evolution of discourse), greater emphasis will be placed on understanding how specific actors and actor types contribute to the discourse structure during each phase. This approach aims to capture responses primarily through the evolving roles of these actors within the actor congruence network. This is detailed in Section 4.8.2.

4.3 (a) Data Selection and Collection

The process of corpus creation is illustrated in Figure 3. It starts with extracting articles from the LexisNexis Database, then filtering and processing articles in Python, and finally coding. This leaves us with 222 newspaper articles—153 from NRC, 87 from De Volkskrant, 104 from Leidsch Dagblad, and 78 from Friesch Dagblad. There are 422 coded statements by 237 individual actors from 172 organisations.

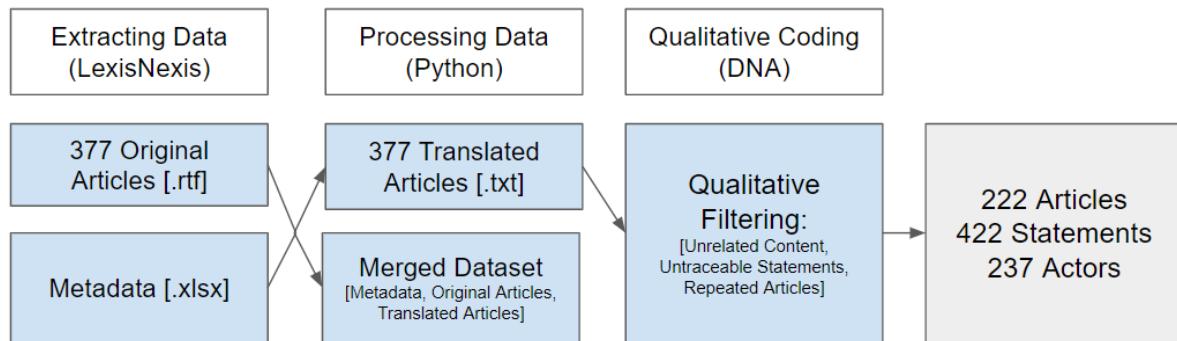


Figure 3. Diagram illustrates the different stages of creating the full dataset, from extracting data from the LexisNexis Database to the Coding.

4.3.1 Extracting Data

Article Selection

The minimum requirement for newspaper data sources is to meet the "quality press criterion" (Leifeld, 2013; Markard et al., 2021), emphasising characteristics such as wide publication range, political moderation, and good reputation. However, choices are still open regarding the regionality and ideological leanings of the newspapers, and they ought to be decided based on the types of discursive conflict relevant to our analytical focuses.

As motivated by the research gap, to study discourse across all actors within the policy accountability chain, the article sources should best account for different administrative levels, sectors, and public and private actors to capture the public discourse surrounding EPA.

4 Newspaper sources are shortlisted—De Volkskrant, NRC, Leidsch Dagblad, and Friesch Dagblad. The former two are national newspapers, while the latter two are provincial newspapers. This ensures a greater spread of national and local representation in discourse. Only the printed forms of newspapers (as opposed to digital) are considered.

National newspapers De Volkskrant and NRC were chosen as they are within the top 3 most read and are considered quality newspapers (Vliegenthart & Boukes, 2018). They also have left and right leanings, respectively (Bosman & d'Haenens, 2008). The

provincial newspapers Leidsch Dagblad and Friesch Dagblad are chosen to capture regional differences such as north versus south, rural versus urban.

Search Strategies

Articles are selected based on any instances of the search term "Omgevingswet", the Dutch term of EPA from before May 2024. Most of the analysis will be conducted until the end of 2023 because the introduction date on 1 January 2024 marks the conclusion of the formal implementation stage. However, collecting data from a few months after the introduction date could be useful for certain analyses as a means of comparison.

There is no minimum threshold for term instances in the search strategy since, based on preliminary assessments, many relevant newspaper articles have only a single instance of "Omgevingswet" in writing as it is mainly referred to within the same text with a different wording, such as "this law" or "the legislation". There are no additional inclusions or exclusions of other terms since the search term "Omgevingswet" is specific enough, and it is unlikely that any reference to its policy components, e.g. policy instruments, would not have already included the term. Filtering of false positives will be done manually based on its relevance to EPA policy.

4.3.2 Translation of Text

By choosing a Dutch case study as a thesis topic, it will be inevitable that much of the primary and secondary sources would be in Dutch (some in Frisian)—a language that I am not fully proficient in at the time of writing.

The primary means to support me through the coding process would be using Google Translate when accessing Dutch sources. Other sources like DeepL were initially considered but did not offer accessible services for translating large bodies of text as required in this thesis project.

Some additional safeguards will be established to ensure language accuracies do not inhibit the reliability of the results. First, the Dutch text will always be retained even after translation so all findings can be linked to its original text form. Secondly, original Dutch vocabulary and terminology will be retained as much as possible while determining storylines. Finally, results will be validated by Dutch peers and supervisors to ensure the original Dutch meanings are not lost in translation.

4.3.3 Filtering and Processing of Articles

From the LexisNexis Database, the original Dutch articles are extracted with the built-in filter for duplicated articles. Next, the articles were translated and formatted (content, title and file format) according to the usability standard for the coding software. A merged dataset is created as a record for the original metadata, original Dutch text, and translated text for reference. After which, the individual articles are imported into the coding software Discourse Network Analyzer v3.0.10 (Leifeld, 2023).

4.4 (b) Coding Process

The stepwise coding process is shown in Table 3, where the additional coded content created at every step is bolded. By the end of the coding process, there will be an event list containing the *Actor*, *Organisation*, *Actor Type*, *Text*, *Summary*, *Storylines*, *Date*, and *Source*, which are the pre-requisite data to conduct the qualitative content and quantitative network analyses.

The coding was done manually by a single coder (the author). The initial step of *identifying statements* was done through the Discourse Network Analyzer, while the subsequent steps were done through Microsoft Excel.

Table 3. Steps of the coding process describing the added variables at every step.

| Step | Variables |
|-------------------------------------|----------------------------------------------------------------------------------|
| 1 <i>Identifying statements</i> | Actor, Organisation, Text, Date, Source |
| 2 <i>Summarising statements</i> | Actor, Organisation, Text, Summary , Date, Source |
| 3 <i>Determining content labels</i> | Actor, Organisation, Text, Summary, < Content >*, Date, Source |
| 4 <i>Classification of actors</i> | Actor, Organisation, Actor Type , Text, Summary, <Content>*, Date, Source |

*Content includes Issues, Storylines and Sub-storylines

4.4.1 Identification and Summarising Statements

The starting point of coding would be the statement, where only full or partial quotes about EPA made by actors identifiable based on their names and/or organisation. This also means that strictly objective statements (e.g. factual reporting of events) and statements untraceable to an individual will be omitted. A statement should be coded with the following information: actor name, organisation, and statement text.

Additionally, each statement inherits the metadata from the articles, including the date and newspaper source.

Summarising statements is not a common practice in coding. However, due to the large number of statements, this intermediate step was deemed necessary to prevent an information overload for the single coder. The summary aims to represent the statement, retaining the used keywords and the underlying ideational structure but with fewer words in English.

4.4.2 Determining Content Labels: Issues, Storylines, Sub-Storylines

Next, determining the content labels is the most important and sensitive step of the coding process, as the analyses are centred around them. An inductive approach will be utilised, where the summary and texts will be used to derive storylines that describe a

concise frame towards EPA. The biases of a single coder are acknowledged, and this is accounted for by an iterative process between the author and his supervisors to discuss the codes. Additionally, a storyline will be coded a maximum of once per actor per article to ensure that the prominence of certain storylines will not be too inflated.

Aggregating large bodies of text into basic storylines is no simple task due to the inherent complexity of the discourse surrounding EPA. Based on an initial preview of the statements, there are several main difficulties—1) layeredness of the statements, 2) overlaps within labels and 3) varying terminologies. Heuristics can be useful in dealing with these issues, which are discussed below.

Layered Arguments in Statements

Often, a statement describing the idea regarding EPA can be rather rich, and there is no clear way to decide the level of aggregation a statement should take when it is being condensed into a storyline. This is illustrated below in an example:

(Dutch) *"Vijftien jaar geleden moest er gedecentraliseerd worden. Zodat gemeenten meer grip zouden krijgen op hun ruimtelijke ordeningsbeleid. Maar de maatschappij is veranderd, we hebben nu te maken met stikstof, woningnood en de energietransitie. Daar willen we juist landelijke regie op hebben. De hele idee achter de operatie is dus achterhaald."*

(Translated) *"Fifteen years ago, decentralisation was necessary so that municipalities could gain more control over their spatial planning policy. But society has changed, we are now dealing with nitrogen, housing shortage and the energy transition. We want to have national control over this. The whole idea behind the operation is therefore outdated"* [Document References; Document 134].

There are multiple ways to code this. If taken as a single storyline, it could be described as “decentralisation for municipal control is outdated because of the need to prioritise national policy issues”. However, if the premises are deconstructed, the statement would have multiple storylines such as “decentralisation is outdated”, “decentralisation provides municipal control”, “national issues should be prioritised”, and “national control is needed”, where it captures more disaggregated parts of the idea that can be points of comparisons with other statements.

Two main heuristics are used to provide more control over the storylines. First, the storylines should only contain one judgement type, i.e. normative or empirical claims. Normative claims could involve the prioritisation of problems or preferences for solutions, while empirical claims could involve expressions of causal understanding. This distinction helps better separate the core aspects more effectively.

Secondly, statements will be coded based on a hierarchy of content labels with descending levels of descriptive resolution—issues, storylines and sub-storylines—which enhances the substantive analysis of discourse. The boundaries of each content label will be additionally defined. The first label *issue* groups storylines by broader

topics, offering neutral categories that encapsulate general themes. The second label *storyline* captures the expression of specific ideas or non-neutral positions on these issues. The third label *sub-storyline* provides a deeper level of analysis, linking to the main storylines while adding descriptive or contextual information. Table 5 illustrates an example of how it is used for a statement. *Sub-storyline* labels are elements of the set of *storyline* labels, which are themselves elements of the larger set of *issues*.

Overlaps within Labels

In the labelling process, a common issue is that statements coded at lower content levels, such as storylines and sub-storylines, often overlap. To manage these liminal statements, they will be contextualised based on the entire article, allowing for an understanding at the issue level first. This approach enables the storylines to be coded with a more nuanced understanding. Each statement will retain an ID link to the full article.

Varying Terminology in Statements

Different words can be used to refer to very similar storylines/logic. There is difficulty in making decisions if these statements use different terminology and should refer to different storylines or the same one.

An example would be in these two statements.

(1)

(Dutch) "Vijftien jaar geleden moest er **gedecentraliseerd** worden. Zodat gemeenten meer grip zouden krijgen op hun ruimtelijke ordeningsbeleid. Maar de maatschappij is veranderd, we hebben nu te maken met stikstof, woningnood en de energietransitie. Daar willen we juist landelijke regie op hebben. De hele idee achter de operatie is dus achterhaald."

(Translated) "Fifteen years ago, **decentralisation** was necessary so that municipalities could gain more control over their spatial planning policy. But society has changed, we are now dealing with nitrogen, housing shortage and the energy transition. We want to have national control over this. The whole idea behind the operation is therefore outdated" [Document References; Document 134]

(2)

(Dutch) "Onze snel toenemende klimaatzorgen hebben het uitgangspunt van **gemeentelijke regie** over geïntegreerde behandeling van onze leefomgeving achterhaald"

(Translated) "Our rapidly increasing climate concerns have made the basic principle of **municipal control** over integrated treatment of our living environment obsolete" [Document References; Document 216]

In both statements, the idea is rather similar, where EPA's intention for municipalities to have more control in spatial planning is ineffective for national issues like climate

problems. However, the statements differ in how they describe EPA's intention, where "decentralisation" (Dutch: *gedecentraliseerd*) and "municipal control" (Dutch: *gemeentelijke*) are used interchangeably in public discourse even though they could be conceptually different.

The approach to resolving this issue is twofold. First, the decision to combine or separate the storylines depends on whether the conceptual difference in terminology will be relevant to understanding the other areas of discourse. In this example, the statement should be separated into different storylines only if other statements contest the link between decentralisation and municipal control, such as arguing that decentralisation might not lead to municipal control.

Second, storylines can be qualified carefully in their wording so that the boundaries of the idea can be established. In this example, the storyline could be worded to describe how decentralisation and municipal control refer to the same intention or instrument logic of EPA. This ensures that the intricacies of statements would not be lost in the process of coding them into storylines.

4.4.3 Actors Coding and Categorisations

In most articles, statements can be attributed to an actor, often identified by their name, organisation, or both. To maintain consistency in actor identification, the primary identifier of the individual actor would be the actor's name, and if not found, would be the organisation.

Additionally, a classification of the actors is necessary to add context to their storylines in which the actor categories will be inferred from the organisation they belong to. These classifications should ideally add more nuance to how storylines are used in the public discourse and capture the relationships between actor types based on ideational similarities.

In line with the research aims the distinction of actor types must accurately capture the various roles within the policy accountability chain, including policymakers, implementers, initiators, civil society, and the non-directly involved. To avoid premature aggregation, a more detailed actor type label will be applied, allowing for finer resolution and potentially revealing unexpected patterns. In all analyses, this disaggregated actor type label will be used; however, interpretations can make references to each actor's role within the accountability chain.

Table 4 outlines the corresponding roles in the policy accountability chain, along with the disaggregated actor type labels used for classification. An exhaustive list of organisations associated with these labels can be found in Appendix C

Appendix .

Table 4. Overview of Actor Aggregated Labels and Disaggregated Labels

| Accountabilities | (Disaggregated) Actor Type Labels |
|-------------------------|---------------------------------------------------------------------------------------|
| Policymakers | Government (National) |
| Implementers | Government (Provincial), Government (Municipal), Government (Waterboard) |
| Initiators | Developers & Construction, Intermediaries, Industry and Businesses |
| Civil Society | Community & Civic Groups, Environmental Groups, Architectural & Planning Associations |
| Non-directly involved | ICT Companies, Academic & Research, Independent |

4.4.4 Overview of Dataset, Variables and Conventions

The dataset is essentially rows of instances in which an actor mentions a storyline through an article document. All analysis techniques can then be generalised as establishing various patterns between every level of coded content variables (issue, storyline, sub-storyline) and the independent variables (actor labels and document information). A comprehensive description of them can be found in Table 5.

Storylines and sub-storylines are linked within the wording of the codes using brackets—square brackets [] denote that a storyline is nested, while the round brackets () denote the simplified version of the storyline to be used in the sub-storyline. The extensive list of all coded labels can be found in Appendix D.

Table 5. Overview of the variables of analysis and examples from a single instance of actor mobilising a storyline

| Content Variables | Description |
|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Issue | Content label that groups storylines based on the broader topics they generally aim to contribute to. These labels are neutral categories. Example: “Effectiveness of Policy - Citizen Participation” |
| Storyline | Content label that describes an expression of an idea or non-neutral position on an issue. Example: “[EPA not effective for Citizen Participation (Not CP)]” |
| Sub-Storyline | Content label that describes the fundamental ideas that represent the original statement. It is formatted in () as a link to the main storylines. This level contains more descriptive/contextual information for the main storyline. Example: “(Not CP) Municipalities have too much control” |
| Actor Variables | Description |
| Person | Actor label that denotes the individual providing the storyline. Example: Jan Struiksma |
| Organisation | Actor label to which the article introduces the organisation to which the individual belongs. |

| | Example: VU Amsterdam |
|--------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Actor Type | Actor label that classifies the organisation into a type that best characterises its role in EPA and the political process. Example: Academic & Research |
| Document Variables | Description |
| Year | Document variable of time aggregated to the year of publishing. |
| Document ID | Document variable that denotes a unique document with an identifier. |
| Document Source | Document variable that denotes its source, i.e. the newspaper publisher. |

4.5 (c) Network Construction and Visualisation

Based on the data from the coding process, the full dataset will be an event list containing *Actor*, *Organisation*, *Actor Type*, *Text*, *Summary*, *Storyline*, *Date*, *Phase*, and *Source*. The construction of the networks will only require the *Actor* and *Storyline*. On the other hand, visualisation and analysis will utilise *Actor Type*, *Date* and *Phase* and generated network metrics.

Various discourse networks can be generated: affiliation network, actor congruence network, conflict network, concept congruence network, and dynamic discourse network. However, the discourse networks useful for the study would be the affiliation network, actor congruence network and storyline congruence networks, which can be constructed from the same dataset. Figure 4 visually illustrates the relationship between all three networks. Below, each network will be elaborated upon.

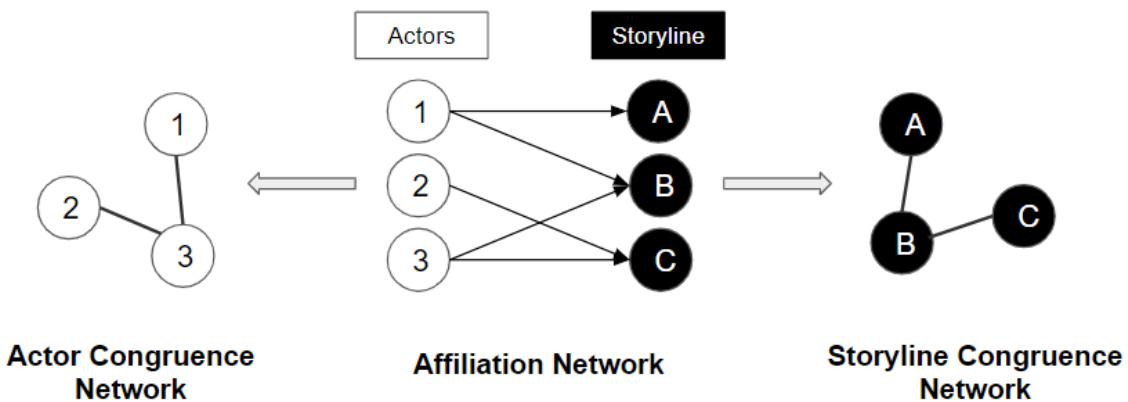


Figure 4. Illustration of the affiliation network in a bipartite structure, actor congruence network and storyline congruence network as one-mode projections of the affiliation network.

Affiliation Network

Affiliation networks are the most basic form, essentially a bipartite graph linking sets of actors to a set of storylines. The links between actors can be qualified with the time of the statement as well as the source of the statement. Below is the matrix notation of the affiliation network.

$$Affiliation[a][s] = \begin{cases} n, & \text{if actor } a \text{ made storyline } s \\ 0, & \text{otherwise} \end{cases}$$

Here, n refers to the number of occurrences in which actor a made storyline s . This also implies that the affiliation network is weighted and directed.

Actor and Storyline Congruence Network

The actor congruence networks are the one-mode projection of the affiliation network where only the set of actors is retained, while storyline congruence networks are the one-mode project of the affiliation network, which only retains the set of concepts. The congruence networks can be obtained from the affiliation network:

$$Actor\ Congruence = Affiliation \cdot Affiliation^T$$

$$Storyline\ Congruence = Affiliation^T \cdot Affiliation$$

Their respective matrix form is shown here:

$$\begin{aligned} Actor\ Congruence[a][a'] &= \Phi_{aa'} \left(\sum_{k=1}^{|Storylines|} Affiliation[a][k] \cdot Affiliation[a'][k] \right) \\ Storyline\ Congruence[s][s'] &= \Phi_{ss'} \left(\sum_{k=1}^{|Actors|} Affiliation[k][s] \cdot Affiliation[k][s'] \right) \end{aligned}$$

where $\Phi_{aa'}$ and $\Phi_{ss'}$ denotes a normalisation function.

In the actor congruence network, the edge weight ($Actor\ Congruence_{ii'}$) is a summation of the number of times actor i and actor i' share a storyline and a representation of their similarities in ideas. In the storyline congruence network, the edge weight ($Actor\ Congruence_{ii'}$) is a summation of the number of times storyline j and storyline j' are commonly shared by actors—it represents conceptual dependencies or similarities between storylines.

Normalisation

Normalisation can be necessary to adjust networks for the varying activity or popularity of nodes. For example, in an actor congruence network, actors with high activity (i.e., a high number of statements) will naturally connect to other actors more, resulting in a core-periphery structure. This might overemphasise these popular actors' influence in the political discourse. Hence, normalisation can help correct this by reducing the effect of high activity and revealing the clustered structures of the actor congruence network.

Average activity normalisation is the most commonly applied normalisation formula (Leifeld et al., 2019) and will be used if deemed necessary. Average activity

normalisation works by dividing the weight of (actor or concept) congruence by the summed average of each node's (actors or storylines, respectively) total connections:

$$\Phi_{aa'}(\omega) = \frac{\omega}{\frac{1}{2}(\sum_{k=1}^{|Actors|} \text{Affiliation}[k][i] + \sum_{k=1}^{|Actors|} \text{Affiliation}[k][i'])}$$

$$\Phi_{ss'}(\omega) = \frac{\omega}{\frac{1}{2}(\sum_{k=1}^{|Storylines|} \text{Affiliation}[k][i] + \sum_{k=1}^{|Storylines|} \text{Affiliation}[k][i'])}$$

Where ω is the edge weight.

Network Visualisation

All network visualisations will be done in R (R Core Team, 2021) through the igraph package (Csardi & Nepusz, 2006). This is to enable the entire analysis pipeline to be done completely on R for easy access to other useful statistical and visualisation tools. Additionally, igraph helps with the reproducibility of visualising multiple networks in which there is more customisation control over layouts, positions, and aesthetics.

4.6 (d) Time Slices for Temporal Analysis

The analysis of discourse networks necessitates the delineation of phases. This delineation is primarily aimed at addressing SRQ3, which focuses on capturing how actors respond to changes in public discourse. For a response to occur, there must first be a stimulus. This stimulus can arise from internal shifts within the public discourse itself, such as heightened media controversies, or from external political events, like major formal decisions. Therefore, a phase should begin with a key stimulus, allowing the subsequent response to be analysed within that phase.

This analytical framework for phases is visually represented in Figure 5.

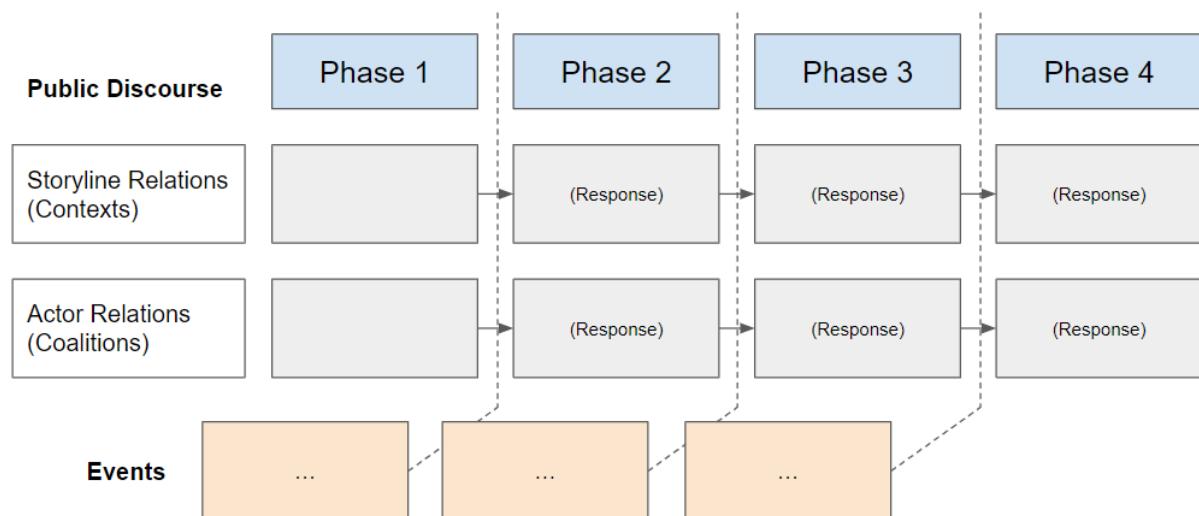


Figure 5. Analytical framework of phases. Blue boxes denote the phases, and orange boxes denote the key events that serve as stimuli for subsequent responses.

Based on observations from tracing both media trends and the formal policy stages, a cyclical trend is observed where there is a spike in article counts between the stages, occurring between the identified stages above. Specifically, they fall between the end of the previous phase and the start of the subsequent phase. This is similar to Leifeld and Haunss' study (2012), in which media attention cycles are observed to be institutionally structured, i.e. intense media attention follows policy "milestones", which then pose significant changes to the public discourse.

Consequently, the boundaries of the phases are delineated as follows, with phase names reflecting the stages outlined by the official EPA knowledge centre, Informatiepunt Leefomgeving (2021c). The progression of EPA is described in the following stages:

- (Legislative Phase 1) Before April 2016
- (Development Phase 2) April 2016 – End 2019
- (Preparation Phase 3) Start 2020 – End 2021
- (Implementation Phase 4) Start 2022 – End 2023

Specific details about the formal policy stages can be found in sections 4.6.1 to 4.6.3, and the alignment of these stages with the media attention trends is shown in section 0.

4.6.1 Legislative Stage (July 2011 - April 2016)

EPA involved an extensive legislative process of 5 years before it was eventually approved. It started with Minister Schultz van Haegen's policy letter in July 2011 to the House of Representatives (Dutch: *Tweede Kamer*) to revise the environmental law. Subsequently, between 2012 and 2013, it went into a period of consultation, which involved an internet consultation on the government memorandum and formal testing and consultation. Similar to other legislative processes, the bill was then considered by the House of Representatives between 2014-2016 before it was finally approved by the Senate (Dutch: *Eerste Kamer*) and published in the Bulletin of Acts and Decrees (Dutch: *Staatsblad*) in 2016. The timeline is summarised in Table 6.

Table 6. A timeline of the legislative process

| Event | Date |
|------------------------------------------------|-------------|
| Announcement of EPA | July 2011 |
| Period of Consultation | 2012-2013 |
| Bill introduced to the House of Representative | Jun 2014 |
| Bill approved by the House of Representative | Jul 2015 |
| Bill approved by the Senate | Mar 2016 |
| EPA was published in the Government Gazette | Apr 2016 |

4.6.2 Development Stage (April 2016 - End 2019)

Following the approval of EPA comes the stage of development, where many legal foundations are established. There are various key milestones of EPA during this phase. The 4 General Regulations, a core instrument of EPA, was published in August 2018, which forms the legal rules necessary for the operation of EPA. They form the basis for the instruments, tasks, and powers of the governments but also contain the standards for the quality of the living environment. In 2019, the Implementation Act, Implementation Decree, Implementation Regulation, and supplementary laws on nature, soil, noise and land ownership have also made much progress in the House of Representatives and the Senate and are in the process of approval. Finally, the most important milestone would be the delivery of the DSO, the digital infrastructure supporting EPA, at the end of 2019, which will allow government authorities to prepare and practice using it.

4.6.3 Preparation and Implementation Stages (Start 2020 - Jan 2024)

Therefore, from 2020 until the eventual introduction of EPA, government authorities are primarily engaged in adapting to the requirements of EPA. The specific events of this period are difficult to describe since each government organisation, such as municipalities, water boards, and provinces, operates differently and behind closed doors.

However, examining announcements regarding postponements provides insight into a prominent narrative from 2020 to 2024, where there is a struggle to establish a functional working method for EPA, characterised by coordination challenges and difficulty working with the DSO. This was further complicated by the disruptions caused by the COVID-19 pandemic, which impeded progress on implementation efforts. The history of postponements is described in Table 7 based on announcements from the Ministry of Interior and Kingdom Relations (BZK).

Table 7. History of Postponements between 2020-2024 with quotes from the official announcement summarising the motivations for the postponements.

| Announced | Revisions | Quotes from the Announcement |
|--------------------------|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Apr 2020 (BZK, 2020) | 1 Jan 2021 → 1 Jan 2022 | “Consider the feasibility of the Environmental Act coming into force on January 1, 2021, partly in view of the changing reality as a result of the coronavirus .” |
| May 2021 (BZK, 2021) | 1 Jan 2022 → 1 Jul 2022 | “This gives the government, municipalities, provinces, water boards and implementing organizations more space to complete the implementation of the law in a careful and responsible manner.” |
| Feb 2022 (BZK, 2022a) | 1 Jul 2022 → 1 Jan 2023 | “The date of January 1, 2023 offers all parties involved clarity and, above all, more certainty to be able to properly practice with the new digital system and the new way of working .” |

| | | |
|--------------------------|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Oct 2022 (BZK, 2022b) | 1 Jan 2023 → 1 July 2023 | “For a careful implementation of the Environmental Act, more time is needed to practice, test and provide additional support from competent authorities. ” |
| Jan 2023 (BZK, 2023) | 1 Jul 2023 → 1 Jan 2024 | “The Environmental Act can start responsibly and carefully... The government, local authorities and the business community unanimously support the introduction as of January 1, 2024.” |

4.6.4 Media Attention Cycles

The analysis of article counts related to EPA offers a straightforward yet effective method for understanding the temporal patterns of media coverage. The articles considered in this study are sourced from four prominent Dutch newspapers used in data collection. As visualised in Figure 6, with colours marking the formal policy stages, there appears to be a spike in article counts around key milestones that define the start of each phase. For instance, the approval of the bill by the Senate in March 2016 marks the beginning of the Development phase, while the delivery of DSO at the end of 2019 signals the start of the Preparation phase. Similarly, the spikes at the beginning of 2021 and 2022 align with the announcement of postponements, which marks the start of the Implementation phase.

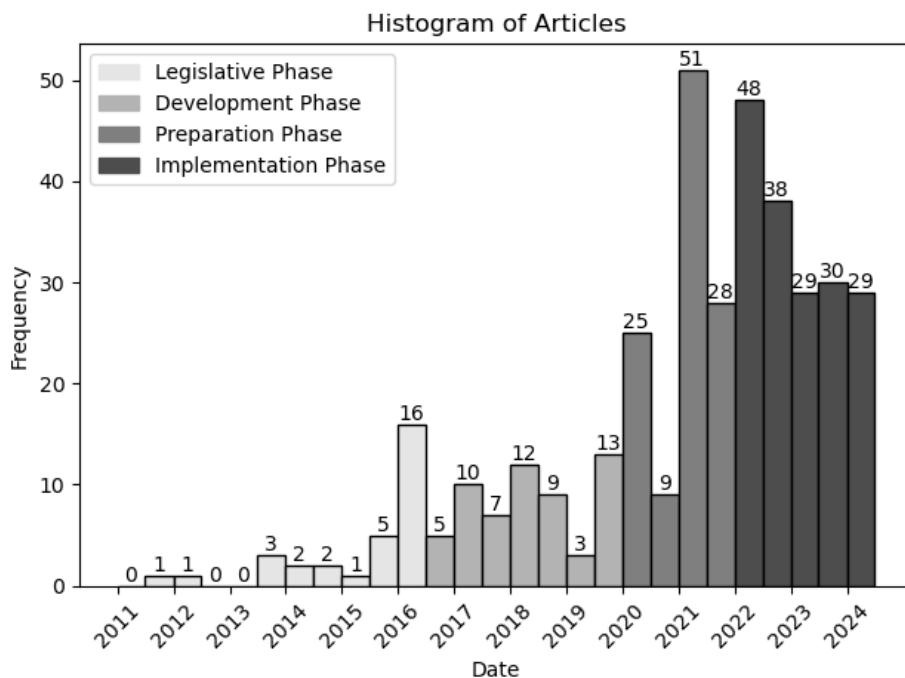


Figure 6. A histogram of article counts in the LexisNexis Database with the term “Omgevingswet” (EPA) in half-yearly intervals. Bars are coloured based on the stages. Articles are sourced from De Volkskrant, NRC, Leidsch Dagblad, Friesch Dagblad

4.7 [SRQ1] Content Analysis

The content analysis will be guided by more sub-sub-questions as a guide. This will be elaborated below in the following sub-subsections.

4.7.1 Exploratory Analysis

How can the underlying patterns and structures guide further analysis?

An explorative analysis involves two sequential association techniques—first, a test of association between the content variables (e.g. storylines, sub-storylines) and independent variables (actor and document) for statistically significant associations, and second, conditional on the presence of association, a test to measure its strength. The chi-squared test and Cramer's V will be used, respectively.

The chi-squared test is the most common test for examining two categorical variables. The test is valid if the test statistic is chi-square distributed under the null hypothesis. The relationship is considered statistically significant if the p-value chosen is under 0.05. Combinations with p-values of 1 will be omitted (as compared to those interpreted as having no association) because it is likely due to the high number of outcomes.

Cramer's V provides a measure of association for large contingency tables, i.e., categorical variables with large numbers of outcomes. This test is based on the chi-squared statistic and provides a value from 0 to 1. A heuristic used to interpret the values would be a weak association from 0.1 to 0.3, a moderate association from 0.3 to 0.5, and a strong association above 0.5 (Cohen, 1988).

Analysis Outcome: Heatmap Matrix of Chi-Squared P-Value and Cramer's V

4.7.2 Substantive Analysis

What are the emergent issues, storylines and sub-storylines?

The analysis begins with a detailed outline of all content labels—issues, storylines, and sub-storylines—identified during the coding process. This step is crucial as it defines the boundaries of the content discussed within public discourse and ensures traceability in subsequent analyses.

Analysis Outcome: Complete set of issues, storylines and sub-storylines

What are the range of positions actors take on specific issues in EPA?

The focus of substantive content analysis should be at the level of issues, as this provides insight into the public opinion being shaped through the storylines and sub-storylines. Storylines and sub-storylines are better analysed within networks where the discursive context is known rather than being studied mostly textually.

A way to qualify how public opinion could be shaped within issues is to investigate the different range of positions and justifications used by contributing actors. An effective means to do so is through types of polarisations. Inspired by Bramson et al.'s (2017) conventions, there are likely to be three types of polarisations most applicable to this study: bipolarisation, dispersed, and consensus. Bipolarisation refers to the presence of two divergent groups characterised by distinctly conflicting ideas. Dispersed polarisation, on the other hand, considers a wider spread of ideas rather than just the extremes. Lastly, consensus is seen in issues with much conceptual similarity in viewpoints and minimal variances in ideas.

Analysis Outcome: Qualitative analysis of “issue” categories based on their polarisation type through storyline and sub-storylines

4.7.3 Temporal Analysis

How does the usage of storylines evolve?

It is also useful to understand how public discourse evolves, and it can be studied at any level of content, issues, or storylines. The selection of issues or storylines could be decided based on findings from the substantive analysis. Results of the temporal analysis could supplement the storyline congruence network to observe how aspects of discourse could rise and fall in prominence.

Here, this analysis will use time intervals of years instead of phases to detect more gradual content changes within the public discourse. Also, since total article counts are different every year (see Figure 6), it will be more accurate to represent the change in prominence of a storyline/issue through the relative comparison with other storyline/issue in that year.

Analysis Outcome: Graphing the changes in content issues and/or storylines.

4.7.4 Actor Analysis

Are there patterns between storylines used and specific actor types?

In addition to the above content analyses, it could be useful to understand the public discourse from an actor lens. Understanding what storylines and issues contributed by actor types could be important to knowing their contribution or roles in shaping discourse. Also, with this, specific changes in public discourse could be contextualised better or traced to certain discursive events caused by actors or actor types.

Analysis Outcome: Graphing actor compositions in storylines and issues; Graphing the changes in actor's contribution to storylines.

4.8 [SRQ2, 3] Network Analysis

Generally, the sub-subquestions in both congruence networks share similar intentions. The first question is a descriptive one that helps characterise a snapshot of public discourse. The second studies this dynamically. The storyline congruence network investigates the changes in discursive context, while the actor congruence network helps us understand the actor responses within the process of coalition forming.

4.8.1 Analysis of Storyline Congruence Network

How are storylines related, and what can the emerging structure show about the discursive context in which storylines are used?

As highlighted in the analytical framework, the analysis of ideational congruence of storylines would be relevant to study the context in which they are used. This draws a deeper understanding of the discursive context as a way to characterise the public discourse.

Analysis Outcome: Cluster analysis of the storyline congruence network.

How have discursive contexts evolved between phases?

As public discourse co-evolves with the policy process, there is a need to study if public discourse shifts and also how. The discursive context in which storylines are mobilised will have to be constantly reinterpreted in each phase.

Analysis Outcome: Observational changes in clustering patterns across 4 phases

4.8.2 Analysis of Actor Congruence Network

What kind of coalition structures have emerged? Are there any noticeable patterns in how actors of the same actor type organise themselves?

Coalition structures broadly describe how discursive influence is distributed among different groups of actors, reflecting the varying degrees of power they hold. Analysing these structures, especially in relation to specific actor types, can provide valuable insights into their roles within public discourse.

To explore this, more advanced network methods will be employed to examine the readjustments of actors within coalitions and across actor types. This includes using community detection algorithms to visually identify clusters within the networks and colouring actor nodes to distinguish different actor types.

Analysis Outcome: Cluster analysis of the actor congruence network. Community detection algorithms if necessary.

How are the coalitions readjusting between phases?

The dynamic analysis of the actor congruence network is similar to the storyline congruence network, which intends to describe changes within the public discourse through discourse coalitions. Observing coalition realignments over phases also provides insights into actor responses through their changing roles in the discursive construction.

Analysis Outcome: Observational changes in clustering patterns across 4 phases.

5 Results

5.1 Exploratory Analysis

The results of the association test are visualised in Figure 7, and their implications are described below.

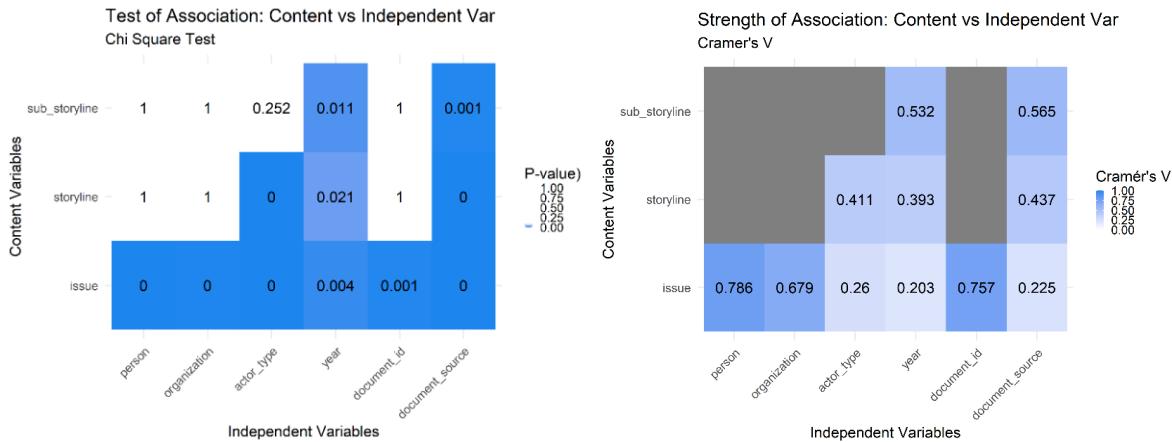


Figure 7. Heatmap diagrams of the test of association (Chi-Squared Test) and strength of association (Cramer's V). The grey in Cramer's V heatmap intends to eliminate variable relationships that do not have statistically significant associations

Scoping of Actor Variables (Content Variables vs Actor Variables)

Studying the association of the different actor labels with content labels helps scope the analysis better by strategically choosing combinations in actor analyses. In this test, association with content can mostly be found on the level of *issue* for all actor labels (*person*, *organisation*, *actor type*).

Person and *organisation* both have strong associations (0.79 and 0.68) with *issue*, implying that both the individual and group tend to be consistently vocal about similar groups of storylines. Additionally, this also means that there are descriptive benefits of choosing *person* over *organisation* even if not substantial. Hence *person* is a suitable variable used to construct the actor congruence network.

Actor type has a moderate and weak association with *storyline* than *issue* respectively. This hints that actors of similar roles could share many similarities in interpretation towards EPA, yet also have sufficient differences in stance taken and issues they address. This relationship will be investigated in more detail.

Time Dependency of Discourse (Content Variables vs Years)

Year has an increasing strength of association from *issue*, *storyline* to *sub-storyline* (0.20, 0.40, 0.53 respectively). This can be interpreted as *issues* being less dependent on time, but more specific *storylines* and *sub-storylines* are more time-dependent. This

could imply significant movement of discourse coalitions and frames over time and will be an important aspect of the political process to examine.

Uncertainty within Documents (Content Variables vs Documents)

Studying the association between *document_id* and *document source* serves as an uncertainty test to acknowledge patterns and variabilities within the media collected, e.g., understanding if publishers have biases towards specific types of content.

Document_id has a very strong association with *issue* (0.76). This confirms that articles mostly focus on specific issues of EPA as opposed to having a larger spread of issues. This confirms that the articles collected are sufficiently reliable in covering discussions of EPA rather coherently.

Document source has an increasing strength of association from *issue*, *storyline* to *sub-storyline* (0.23, 0.44, 0.57 respectively). The weak association of issues show that the different publishing companies cover all issues fairly well. However, the stronger association of *storyline* and *sub-storyline* with document source implies that storylines could be geographically dependent (different newspapers are of different regions and regional scales) or even, although unlikely, affected by ideological leanings. This generally affirms the usefulness of choosing a wider variety of articles to better capture the diversities within the political discourse.

5.2 Substantive Analysis

The inductive coding process codes each statement with one *issue*, one *storyline* and one *sub-storyline*. This can be found on all levels of content, from issues to storylines to sub-storylines, as established in Section 4.4.4.

There are a total of 10 *issues*, 60 *storylines* and 111 *sub-storylines*. How *issues*, *storylines* and *sub-storylines* are nested can be found in Appendix D. The full dataset detailing how statements are labelled with *issues*, *storylines* and *sub-storylines* can be found in Appendix E.

In the following sub-subsections, a qualitative analysis of issues will be conducted based on their polarisation type. First, each issue will be described, and its polarisation type will be justified. Then, issues with the same polarisation type will be explored in detail, with an explanation of how the relevant storylines and sub-storylines contribute to their construction.

5.2.1 Polarisation Types for Each Issue

Table 8 lists all issues found in the complete dataset of the public discourse surrounding EPA. It is additionally characterised by example storylines and descriptions.

Bipolarised issues include *Instrument logic*, *Effectiveness of Policy*, and *Stances on Implementation*, which tend to have two prominent storylines that are ideationally divergent. Dispersed issues include *Prioritisation of Objectives*, *General Implementation Beliefs*, and the *Viability of Implementation*, which has a wider spread of ideas as opposed to the extremes found in bipolarised issues. Consensual issues include *Effectiveness of Policy for Integration* and *Threats from Implementation*, which has storylines with much conceptual similarity in viewpoints and minimal variances in ideas.

Table 8. Summary of issues detected through coding. Each row covers an issue and includes top storylines and a description. Numbers represent the statement counts per issue. Storylines are expressed in the text notations explained in Section 4.4.4. Full set of labels can be found in Appendix D.

| s/n | Issues & Storylines | Description |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Instrument Logic (93) [Decentralisation is beneficial (D)] [Centralisation is needed instead (C)] | Issue is centered around two storylines of divergent support for the main instrument logic of EPA “Decentralised, Unless”. |
| 2 | Prioritising Objectives (26) New noise standards hinder housing construction Citizen participation makes progress slower ...6 more storylines | Issue includes several storylines reframing or contesting the intended objectives of EPA. They contain normative stances on how problems should be prioritised. |
| 3 | Effectiveness of Policy for Citizen Participation (63) [EPA not effective for CP (Not CP)] [EPA is effective for CP (CP)] | Issue is centred around two storylines of opposing empirical understanding of whether EPA indeed leads to the intended objective of citizen participation. |
| 4 | Effectiveness of Policy for Simplification (25) [EPA simplifies procedures (Simple)] [EPA does not simplify procedures (Not Simple)] | Issue is centred around two storylines of opposing empirical understanding of whether EPA indeed leads to the intended objective of procedural simplification. |
| 5 | Effectiveness of Policy for Noise Standards (8) New noise standards are good to curb noise pollution New noise standards does not deal with aviation | Issue is centred around two storylines of opposing empirical understanding of whether EPA’s additional noise standards indeed address noise problems. |
| 6 | Effectiveness of Policy for Integration (12) [EPA is effective at sectoral integration (Int)] | Issue has a consensus of the effectiveness of the “integral” planning approach EPA intends for, and storylines qualify the different aspects of integrality. |
| 7 | General Implementation Beliefs (20) Implementing decentralisation is difficult Intention is good but effectiveness depends on implementation ...6 more storylines | Issue displays a wide range of general sentiments towards the broad direction of implementation and the implementation process. |

| | | |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| 8 | Threats from Implementation (29) Process of Implementation threatens me New changes affects my interest negatively | Issue includes storylines containing a negative consensus towards how EPA was implemented as well as the process. |
| 9 | Viability of Implementation (65) [Resources are lacking for municipalities] [Introducing EPA leads to legal Issues] ...10 more storylines | Issue includes several storylines highlighting specific factors and circumstances that influence the viability of implementation. |
| 10 | Stances on Implementation (80) [EPA's Introduction should (Postpone)] [EPA's Introduction should (Not Postpone)] ...16 more storylines | Issue is centred around the different stances towards postponement but also includes varying recommendations on how implementation can be better. |

5.2.2 Bipolarised Issues

Bipolarised issues take up the greatest proportion of statements (245 out of 422). An overview of the bipolarised issues and their respective conflicting storylines can be seen in Table 9. As seen from the counts, each opposing pair of storylines is relatively even without a clearly dominating side. Examples described below can be referenced in the same Table 9, which provides the most frequently occurring sub-storylines for each storyline pair.

Instrument Logic: Decentralisation vs Centralisation

The conflict surrounding instrument logic lies in the debate on whether decentralisation or centralisation is necessary. Other alternative terminologies, such as the “municipal control” or “market-based approach” are discovered in various statements but are subsumed within “decentralisation” to align with the official framing of EPA by the government. This can be seen from the original statement texts in Appendix E.

Storylines with support for decentralisation are largely based on the idea that it provides municipalities more control to set protectionist rules or have more flexibility to explore more development opportunities. On the other hand, storylines against decentralisation are in direct response to the fact that more municipal control affects the countries’ coordination to tackle national issues coherently and that the flexibilities allowed are at the expense of important environmental standards that have been established over the years. Additionally, some storylines attempt to refute the main arguments of each position. An example would be *Decentralisation still allows for adequate environmental protection*, which intends to provide a counter-argument against *Decentralisation causes environmental standards to fall* (see Appendix D; rows 7, 11). However, there are very few—4 counter statements out of 93 total statements.

Effectiveness of Policy: Effective vs Not Effective

There are three main bipolarised issues surrounding the *Effectiveness of Policy for Citizen Participation*, and –for *Procedural simplification* and –for *noise standards*; the ideas refer to EPA's programme-level objectives, e.g., "insightful environmental law" and "space for customisation" (see Section 3.1.2). In *issue*, there is an underlying premise amongst all contributing actors that these intentions of EPA are valued; however, their empirical observations or causal interpretation of whether it actually works differs. In opposing storylines, more frequently occurring sub-storylines point to major flaws in the policy formulation, e.g. *(Not Simple) New rules are complicated for initiators* (see Table 9; row 14). Other sub-storylines attempt to evaluate the policy with a more holistic definition of citizen participation, e.g. *(Not CP) EPA favours minority* (see Table 9; row 8). Suggestions on how to address them are seldom or not made at all. Overall, adjustments in policy formulation are in heavy demand, but there is an acknowledgement that the call to action is not obvious.

Stance on Implementation: Postpone vs Not Postpone

Finally, an also important issue with a conflicting structure is the stance on implementation. The issue is dominated by storylines intending to influence formal decisions on when EPA should be introduced. Storylines supporting the postponement are calls for more time to adjust and prepare. Storylines, which support their respective introduction dates, acknowledge the risks but take a pragmatic stance that the cost of delay outweighs the benefits of delay. Some examples of reasons include *(Not Postpone) Preserve Momentum* and *(Not Postpone) Postponement does not improve the situation* (see Table 9; row 22, 23).

There are more extreme stances where few actors advocate for a full cancellation of the policy. However, the majority still implicitly support the eventual introduction of EPA.

Table 9. Table lists bipolarised issues (blue header) with their corresponding conflicting pair of storylines (bold) and sub-storylines (normal). Numbers reflect the occurrence of statements found per sub-storyline. Storylines and Sub-storylines are expressed in the text notations explained in Section 4.4.4.

| 1 | Instrument Logic | | |
|---|----------------------------------------------------------|---------------------------------------------------------------------------|--------------------------------------------------------------------|
| 2 | | [Decentralisation is beneficial (D)] | [Centralisation is needed instead (C)] |
| 3 | 33 | <i>(D) Decentralisation allows local govt to set rules for protection</i> | <i>(C) Decentralisation loses coherence for national issues</i> |
| 4 | 17 | <i>(D) Decentralisation provides local govt development opportunities</i> | <i>(C) Decentralisation causes environmental standards to fall</i> |
| 5 | | | |
| 6 | Effectiveness of Policy for Citizen Participation | | |
| 7 | | [EPA not effective for CP (Not CP)] | [EPA is effective for CP (CP)] |
| 8 | 17 | <i>(Not CP) EPA favours minority</i> | <i>(CP) Process involves citizens more</i> |
| | | | 23 |

| | | | | |
|----|----------------------------------------------------|---------------------------------------------------------|--------------------------------------------------------|---|
| 9 | 7 | (Not CP) Implementation was lacking | (CP) Considers citizen interest better | 8 |
| 10 | 5 | (Not CP) Municipalities have too much control | | |
| 11 | | | | |
| 12 | Effectiveness of Policy for Simplification | | | |
| 13 | | [EPA simplifies procedures (Simple)] | [EPA does not simplify procedures (Not Simple)] | |
| 14 | 7 | (Simple) Rule bundling makes initiation process simpler | (Not Simple) New rules are complicated for initiators | 5 |
| 15 | 4 | (Simple) Rule bundling makes rules clearer | (Not Simple) New rules are complicated for everyone | 3 |
| 16 | | | | |
| 17 | Effectiveness of Policy for Noise Standards | | | |
| 18 | 6 | New noise standards are good to curb noise pollution | New noise standards does not deal with aviation | 2 |
| 19 | | | | |
| 20 | Stance on Implementation | | | |
| 21 | | [EPA's Introduction should (Postpone)] | [EPA's Introduction should (Not Postpone)] | |
| 22 | 11 | (Postpone) More time to work on DSO | (Not Postpone) Preserve Momentum | 6 |
| 23 | 9 | (Postpone) Introduction now is risky | (Not Postpone) Postponement does not improve situation | 3 |
| 24 | 8 | (Postpone) More time for municipalities to prepare | (Not Postpone) Prevent Additional costs | 2 |
| 25 | | | | |
| 26 | | [EPA should be cancelled (Cancel)] | [EPA should not be cancelled (Not Cancel)] | |
| 27 | 3 | (Cancel) DSO is flawed | (Not Cancel) Should not cancel even with problems | 1 |

5.2.3 Dispersed Issues

Dispersed issues take up the second highest number of statements (136 out of 422), yet they have the most number of issues due to the broadness of viewpoints. The storylines are not entirely in agreement with each other, but the differences between them are not as clear. Examples described below can be referenced in Appendix D, which displays the set of issues, storylines and sub-storylines.

Prioritisation of Objectives

This issue is essentially a discussion of priorities that EPA, or broadly the planning system, ought to take. The most prominent storylines involve prioritising the urgency of construction for housing or national projects; the key objectives that EPA promises,

such as citizen participation and noise standards, are expected to hinder the important progress. An example of storylines would be *New noise standards hinder housing construction*, and *Citizen participation makes progress slower fall* (see Appendix D; rows 18, 19). Other storylines also include support or even moderate adjustments to the original objectives so that they can be more robust and holistic.

General Implementation Beliefs

This issue includes a wide range of storylines about the general perception towards the implementation of EPA. The most frequent storylines are *Intention is good but effectiveness depends on implementation* and *Implementing decentralisation is difficult*, which represents actors' expectations of the implementation process (see Appendix D; rows 57, 59). Other storylines suggest challenges or approaches towards implementation, e.g. *Overfocus on implementation than policy adjustment* (see Appendix D; rows 18, 19).

Viability of Implementation

The issue of viability includes a wide range of important factors that will affect implementation. The two most frequent storylines would be *Resources are lacking for municipalities* and *Introducing EPA leads to legal Issues* (see Appendix D; rows 73, 80). They are mostly empirical statements about implementation, and the motive to discuss it is to illuminate challenges in implementation to address or be wary about. Other storylines include the influence of DSO's mismanagements on implementation (see Appendix D; rows 88-97).

Stance on Implementation

Apart from the bipolarised storylines on the introduction of EPA, this issue also contains various recommendations and stances on implementation. Top examples would include *Municipalities can do more for citizen participation* and *More direction and support from national government*. Most of these storylines have a single occurrence, but they tend to be descriptive yet concrete suggestions on how to possibly improve implementation. This includes suggestions applied to "working methods", on-the-ground implementation, as well as formal decisions on higher administrative levels in decision-making.

5.2.4 Consensual Issues

Finally, the issue drawing consensus forms the smallest number of all statements (41 out of 422). These ideas tend to be non-neutral, in which a very specific aspect of the policy is either favourable or unfavourable. Overall, it is observed that these issues are only applicable to specific groups of actors. Examples described below can be referenced in Appendix D, which displays the set of issues, storylines and sub-storylines.

Effectiveness of Policy for Integration

There is much consensus that the policy is well-designed to motivate more horizontal or sectoral integration with a single storyline [*EPA is effective at sectoral integration*]. Sub-storylines describe the various areas of positive influence, such as integrated goal setting, integrated planning, integrated coordination, etc (see Appendix D; row 50). The policy instruments of EPA are designed rather successfully for such purposes. This issue applies largely to municipal actors or the main implementers of the policy.

Threats from Implementation

There is also great consensus on the reasons for how implementation affects actors negatively. The two main threats are related to the process of implementation, e.g. *System change delays progress* and the implementation decisions, e.g. *New municipal plans affects my interest negatively* (see Appendix D; rows 67, 70). This issue applied mostly to the initiators, e.g., development and construction or industries & businesses (see Figure 10).

5.3 Temporal Analysis

As inferred from the association tests, storylines are fairly time-dependent. It is expected that there will be changes in the discourse over time, and it will be useful to understand the change in the political process through the movements of storylines. In this subsection, analyses will be conducted with yearly intervals as opposed to policy phases, as a finer resolution can give more nuance to changing patterns of public discourse.

5.3.1 Trends in Issues

Studying changes in issues helps to qualify media trends (as described in Figure 6) by understanding the broad content changes that occur. Each issue can also be referenced at different policy content levels (e.g. high-level abstraction or on-the-ground; see Section 3.1) to gain further insight into which aspects of the policy are being addressed at various times.

Additionally, since the number of statements varies greatly over the years, there is a need to study the prominence of an issue with respect to its year. As such, yearly rankings of all issues are plotted on a line graph, as illustrated in Figure 8.

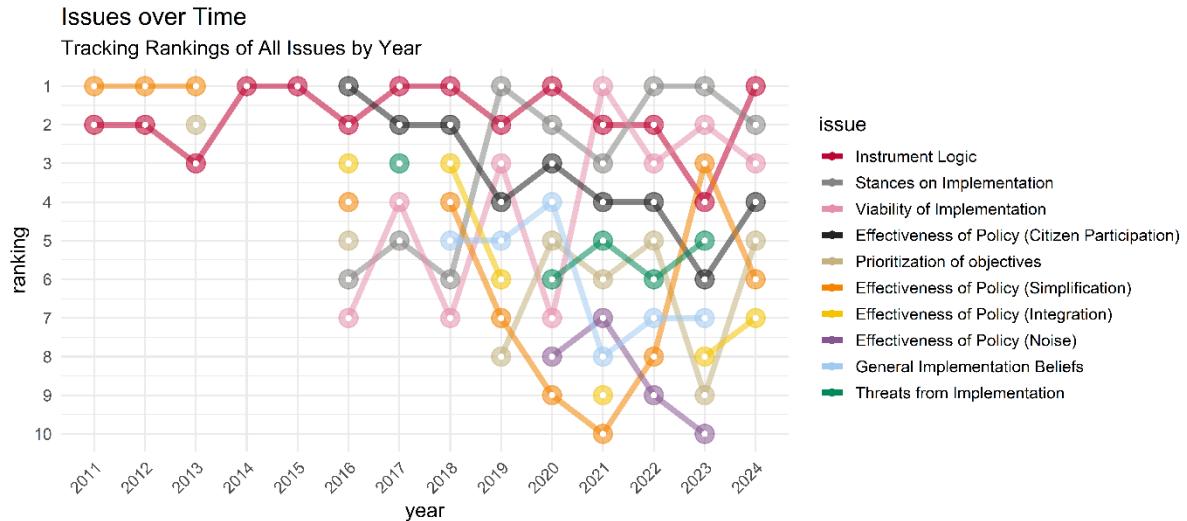


Figure 8. Line Graph of Ranking Changes in Issues. Line breaks and missing points represent a lack of storylines under that issue in that year. Note: Data collected for 2024 is up till the end of April 2024.

Evolution of Issues in Discourse across the Phases

The most noticeable observation would be how the number of issues changes over time, representing how the diversity of issues has evolved since its inception. Public discourse initially started with two or three issues in the initial years of 2011-2013 but fell to one (i.e., only *instrument logic*) between 2014-2015. Subsequently, it jumped to 5-7 issues between 2016 to 2018. From 2019, the discourse started to rise to 8-10 issues. Even though 2024 has not yet been completed in time of writing, the number of issues has decreased to 7 based on the articles from approximately the first half of the year (up to April 2024). This observation aligns with the different policy phases as described in Section 4.6.

In the Legislation Phase (1) (see year 2011-2016 in Figure 6), the diversity of issues was limited due to how early they had been introduced and conceptualised. During this period, discourse revolves around *Effectiveness of Policy* and *Instrument Logic*, which are high-level abstractions of the policy.

Next, in the Development Phase (2) (see year 2016-2020 in Figure 6), issues became broader where discourse was opened to programme-level policy components such as *Effectiveness of Policy for Citizen Participation* and *integration*, and also *Prioritisation of Objectives*. Issues related to on-the-ground policy components, i.e. implementation-related issues of *Stance on Implementation* and *Viability of Implementation*, were not as influential but began emerging from this phase.

Finally, in the Preparation (3) and Implementation (4) phases (see year 2020-2023 in Figure 6), the number of issues reached its maximum. This marks the peak of the discourse where the media attention surrounding EPA is heightened.

Sustenance of Issues and Storylines

Different issues have different patterns of “sustain”, where they each have different periods of continued presence or relevance across the years, some longer than others. The main four observed sustain patterns and their respective issues are as follows:

a) Issues sustained throughout all years:

Instrument Logic

b) Issues sustained throughout starting from the Development Phase (2):

Effectiveness of Policy (Citizen Participation, Viability of Implementation and Stance on Implementation)

c) Issues sustained throughout starting from the Preparation Phase (3):

Prioritisation of Objectives, Effectiveness of Policy for Noise, Threats from implementation and General Implementation Beliefs

d) Issues with no sustenance:

Effectiveness of Policy (Integration)

Overall, this pattern points to how issues are accumulating over the span of the political discourse before the introduction of EPA. This also means that issues enter at specific times, aligning with the policy phases, but remain relevant even as their relative importance has changed. This broadly suggests how the discourse of EPA has been either increasingly disputed, where issues are being discussed more in detail, or increasingly complex, where the logical links between issues increase over time. This will be investigated further in the analysis of the storyline congruence network in Section 5.5.

5.3.2 Trends of Conflicting Pairs of Storylines in Bipolarised Issues

Discourse literature typically emphasises how discursive hegemony influences formal decision-making by dominating public opinion (see Section 2.2.3). Conflicting pairs of storylines in bipolarised issues are investigated because it is relatively straightforward to observe dominance through these conflicting pairs; one storyline will have a significantly higher count than the other in a year or in consecutive years. Specific turning points observed in the graph will be referenced alongside key events from Section 4.6 to infer reasons for observed trends occurring.

These line graphs are illustrated in Figure 9.

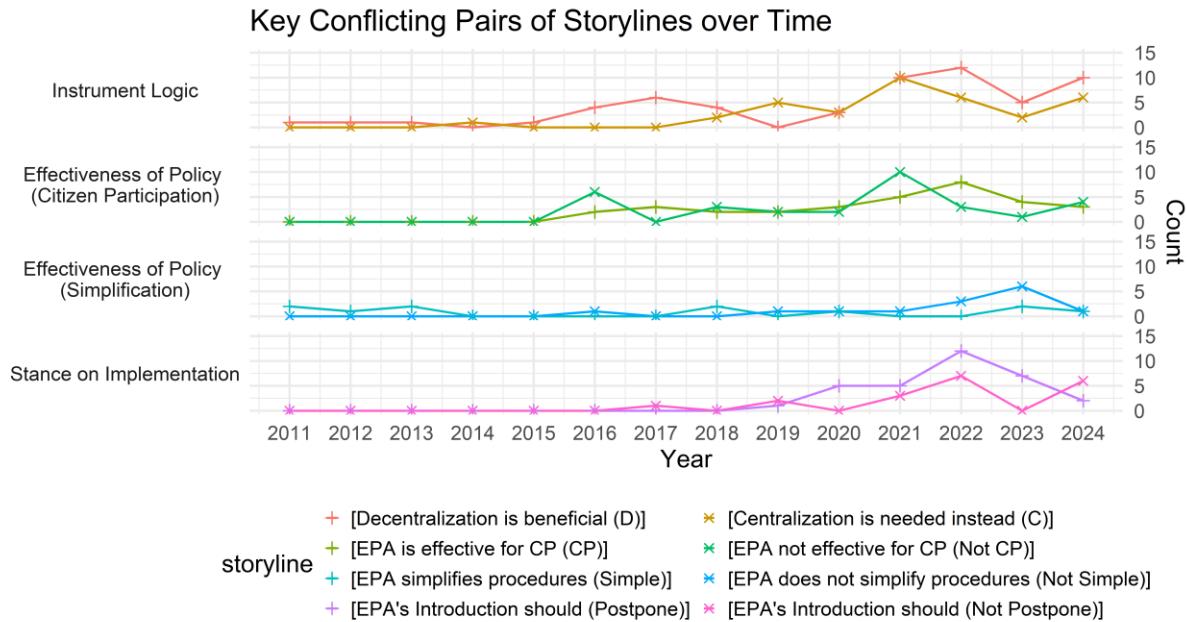


Figure 9. Line Graphs of Statement Counts over Years for Conflicting Pairs of Storylines for Bipolarised Issues. Note: Data collected for 2024 is up till the end of Apr 2024.

General Patterns

All issues can be broadly characterised by alternating periods of dominance for each conflicting storyline. They all last for approximately 2 to 3 years. The only exception would be in the *Stance on Implementation*—in which the difference in statement counts between conflicting storylines tends to be the largest between 2020 and 2023, during the Preparation (3) and Implementation (4) Phase. Through the crucial eight-year period of development to implementation from 2016 to 2023, no issue was ever convincingly resolved, as suggested by the lack of dominance from either conflicting storyline. Hence, understanding how these patterns influence formal decision-making is not as clear.

Tracing Turning Points for Conflicting Pairs

“Turning points” are generally identified as the specific years when significant changes occur in the relationships between storylines, such as when one storyline greatly increases and becomes more dominant than the other. These turning points are often linked to key formal events.

At the start of Development Phase (2), when the bill was approved in early 2016, the storyline *[Decentralisation is beneficial]* began to trump over its antithesis *[Centralisation is needed instead]* (see Figure 9; Instrument Logic). Also, the storyline *[EPA not effective for CP (Not CP)]* trumped over the antithesis *[EPA is effective for CP (CP)]* (see Figure 9; Citizen Participation).

At the start of Preparation Phase (3), when DSO was delivered in late 2019, the storyline [*EPA's introduction should (Postpone)*] trumped [*EPA's introduction should (Not Postpone)*] (see Figure 9; Stance on implementation).

Between the Preparation Phase (3) and Implementation Phase (4) in 2021-2023, the wave of frequent postponement announcements appears to be linked to the yearly alternating dominance of each storyline within *Instrument Logic* and *Effectiveness of Policy (Citizen Participation)*.

However, other turning points cannot be traced to specific turning points. One example would be in 2019, when [*Decentralisation is beneficial*] began to trump over its antithesis of [*Decentralisation is beneficial*]. It could be emerging reactions from within the public discourse.

5.4 Actor Analysis

The relationship between storylines and actors reveals much about the public discourse. This information qualifies ways actors have been contributing to the discourse of EPA through their use of specific storylines. Also, understanding how this relationship changes over time is important to tracing the evolution of the discourse. Hence, in this subsection, the static and dynamic relationship between storylines and actors are explored.

5.4.1 Utilisation of Storylines by Actors

Understanding how storylines are generally used by actors can provide some insights into the specific roles they play in public discourse. While it cannot offer detailed information about these roles in discourse without considering the changes in discursive context and coalitions, by examining their total contributions to different issues and storylines, it can reveal general ways in which specific actor types influence the public discourse.

The composition of each actor type's contribution to issues and most occurring storylines are illustrated in Figure 10 and Figure 11, respectively.

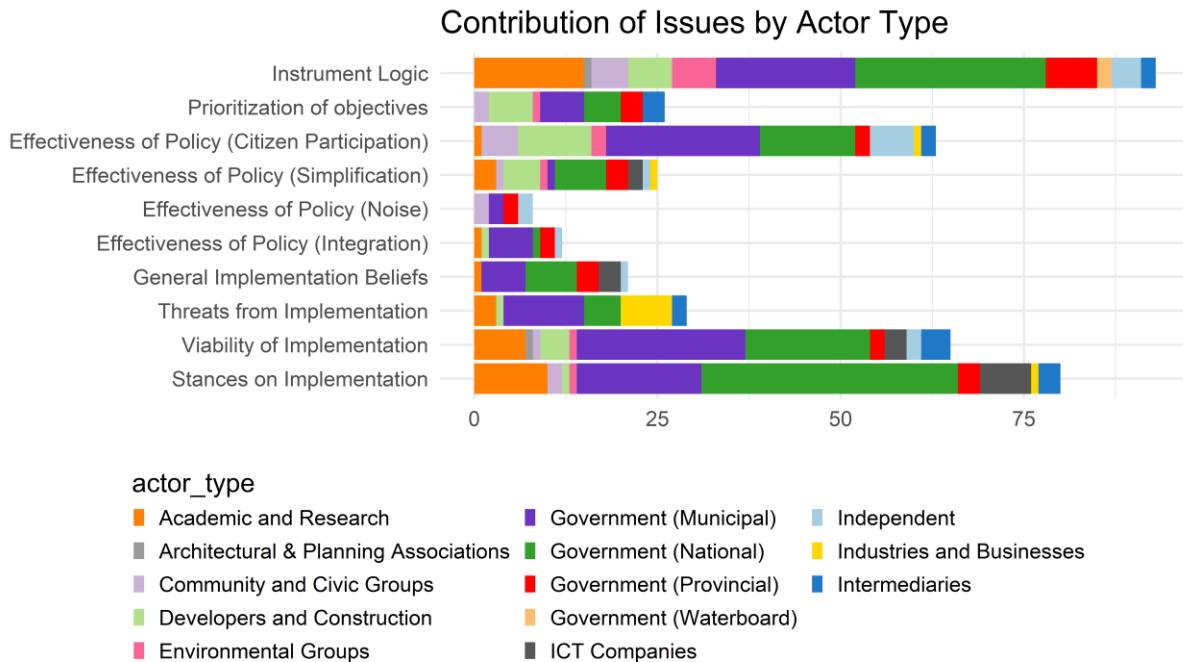


Figure 10. Stacked barplot of issues where the colours correspond to actor types.

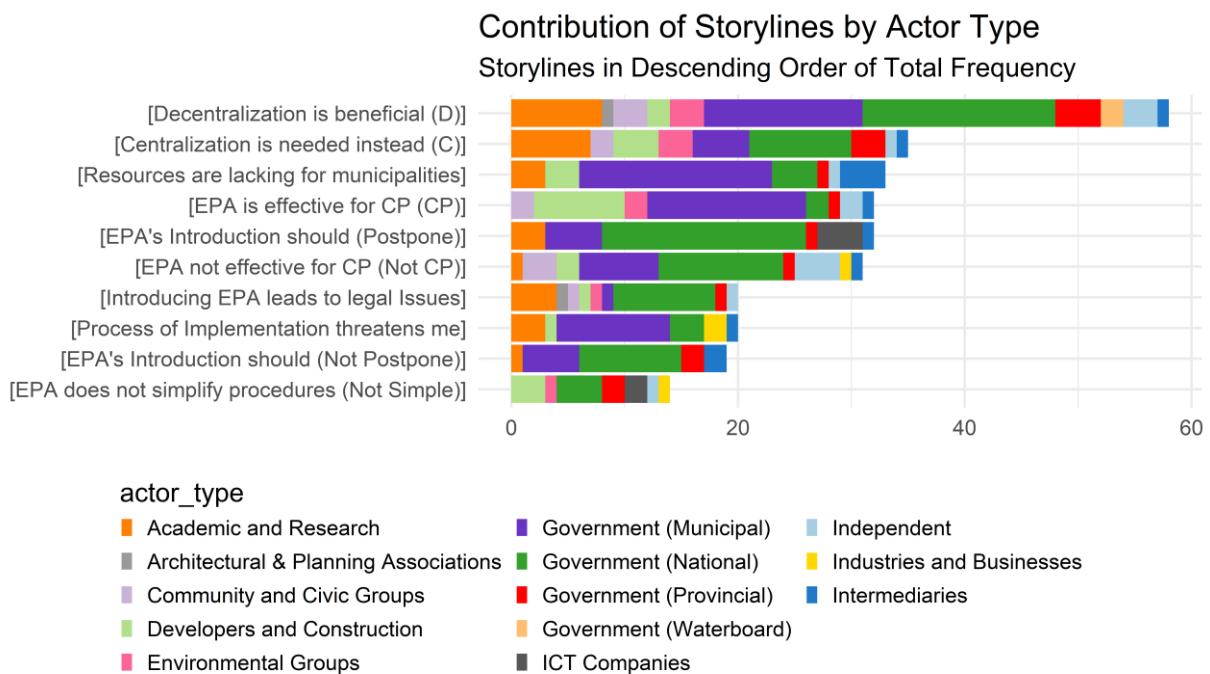


Figure 11. Stacked barplot of top 10 most frequently occurring storylines where the colours correspond to actor types

Based on statement counts towards issues and the top storyline, the top contributors in descending order are the municipal and national government, followed by academic & research, and developers & construction. More details of each actor type are described below. Additionally, the top storylines by actor type can be found in Appendix GAppendix F.

Government Actors: Roles of Implementers and Policy Makers

Government actors are greatly influential in all issues and top storylines; 7 out of 10 issues and 8 out of 10 top storylines have a majority (above 50%) contribution by them. It is also observed that each storyline is mostly used by either the municipal government or national government but seldom equally used. This suggests their distinctive roles within the public discourse.

Storylines contributed comparatively more by the municipal government include: *[Resources are lacking for municipalities]*, *[EPA is effective for CP (CP)]*, *[Process of Implementation threatens me]* (see Figure 11). The discourse surrounding on-the-ground matters regarding the viability of implementation, as well as potential threats, are influenced by the municipal government.

Storylines contributed comparatively more by the national government include: *[EPA's introduction should Postpone]*, *[Introducing EPA leads to legal issues]*, *[EPA's introduction should (Not Postpone)]*, *[EPA not effective for CP (Not CP)]* (see Figure 11). Legal matters and formal decisions are primarily issues that the national government focuses on and contributes to in the discourse. However, they also contribute to the opposing storylines, i.e. citizen participation is ineffective. The issue of *Effectiveness of Policy for Citizen Participation* is observed to be the most prominent conflict between the national and municipal governments.

Finally, storylines tied in contribution include *[Decentralisation is beneficial (D)]* (see Figure 11). Both municipal and national governments are generally supportive and contribute equally to mobilising support for the fundamental intention of EPA, which is to decentralise.

Non-Government Actors: Differentiating Role of Government Actors

On the other hand, the contribution of non-government actors should not be underestimated. They have significant influences (close to 50%) in issues of *Instrument Logic*, *Prioritisation of Objectives*, *Effectiveness of Policy for Simplification*, and *Threats from implementation*, which also tend to be smaller and less prominent issues. Their influences on the most prominent storylines are also overshadowed by government actors because of their comparatively low number of total statements.

Within the top 10 most frequent storylines, only *[Centralisation is needed instead (C)]* and *[EPA does not simplify procedures (Not Simple)]* were the only storylines that had a majority contribution of non-government actors (see Figure 11). Non-government actors play an important role in mobilising storylines opposing the core intentions of EPA, specifically through contesting the issue of *instrument logic* and *effectiveness of policy for simplification* (see Figure 10).

Also, in comparing individual non-government actor types, they contribute to very distinct issues or storylines, e.g. industries & businesses actor types on *Threats from Implementation* (see Figure 10).

5.4.2 Movement between Actors and Storylines

To capture how actors influence or are influenced by the movements within discourse, studying dynamic changes in the mobilisation of storylines by each actor type will be useful.

Studying 3-dimensional pattern changes concerning *storyline*, *actor type*, and *year* will be difficult due to the enormous number of data points. To reduce cognitive overload, an indicator is developed to simplify the dimension of time—an absolute sum of year-over-year frequency change. Frequency change is used to approximate and measure the extent of influence an actor type has on the changing prominence of a storyline, and the absolute summation helps to account for both increases and decreases since any direction of change is influential in the evolution of discourse.

This is visualised below in Figure 12.

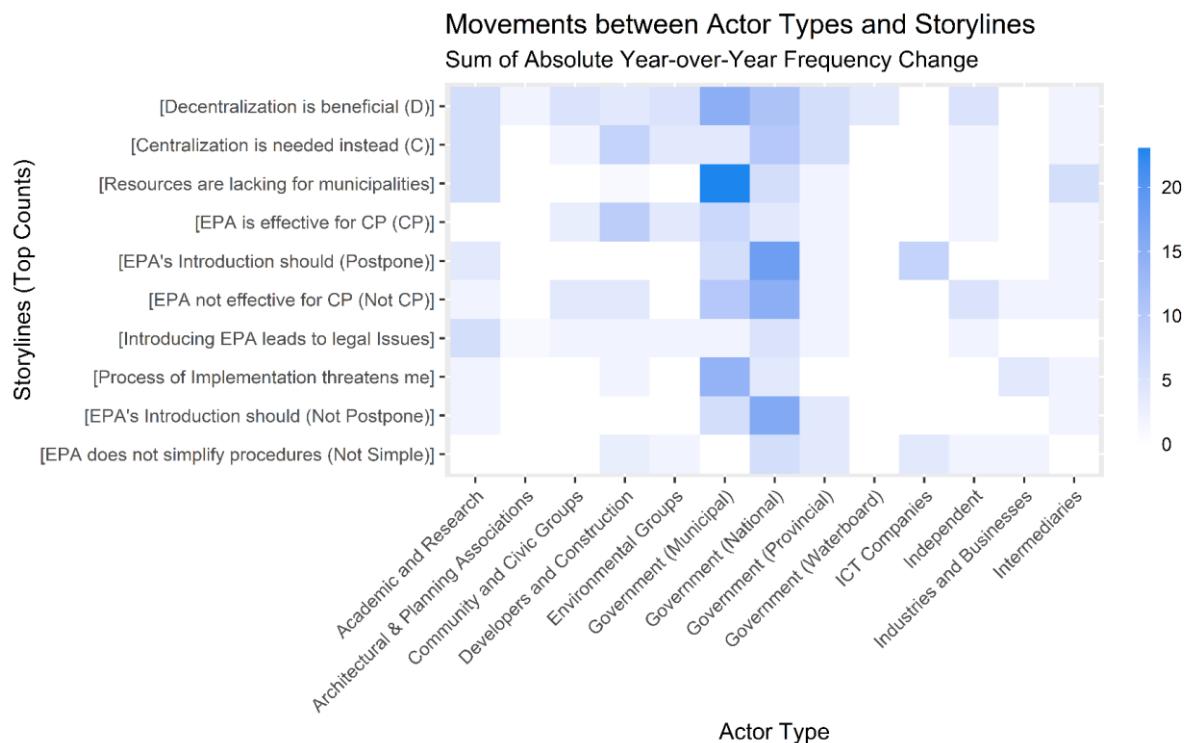


Figure 12. Table of absolute sum of year-over-year frequency change for the top 10 storylines based on counts

The most distinct pattern is how the national and municipal government is largely influencing and/or influenced by the evolution of discourse surrounding EPA, as observed by the dark-coloured boxes in their respective columns. However, movements in storylines [*Centralisation is needed instead (C)*], [*EPA is effective for CP (CP)*] and

Introducing EPA leads to legal issues are greatly associated with non-government actors, i.e. developers & construction, and academic & research.

This information indicates significant shifts in positions on issues or changes in employed storylines—in the subsequent analyses of networks, specific movements will be considered to better rationalise why discursive structures change.

5.5 Analysis of Storyline Congruence Network

Storyline Congruence Network

The storyline congruence network describes the discursive context in which storylines are operationalised by actors. The nodes represent a storyline, and the edge represents every instance in which they were co-referenced by an actor. Two storylines that are frequently co-referenced could represent ideational similarities. A tight cluster of storylines can be interpreted as a dominant frame in discourse space.

The storyline congruence network based on the four policy phases is illustrated in Figure 13, Figure 14, Figure 15 and Figure 16. Appendix H provides a compiled diagram with all of them for side-by-side reference.

Overall Structural Changes

Through the four phases of development, it is visibly observed that the number of connected storylines has increased. It started with two isolated clusters in the Legislation Phase (1) and transitioned to having two equally distributed hub-and-spoke structures in the Development Phase (2). Next, it began to adopt a ring structure in the Preparation Phase (3) but eventually converged into two more dense but unequally distributed hub-and-spoke structures in the Implementation Phase (4). An elaboration of each phase is as follows.

Legislative Phase (1): Initial Conceptualisation

During the initial phase of legislation, the public discourse around EPA primarily focused on its effectiveness. As visualised in Figure 13, the structure of storylines was divided into two distinct and evenly distributed storyline clusters, one involving policy effectiveness of citizen participation and one involving policy effectiveness simplification. The unconnected clusters of storylines suggest that the policy was still new and relatively unexplored due to it being in a conceptual stage. Storylines also mostly address discourse at higher abstraction levels of the policy, such as instrument logic or policy effectiveness, and it can be interpreted that actors were attempting to ground the fundamental intentions of EPA.

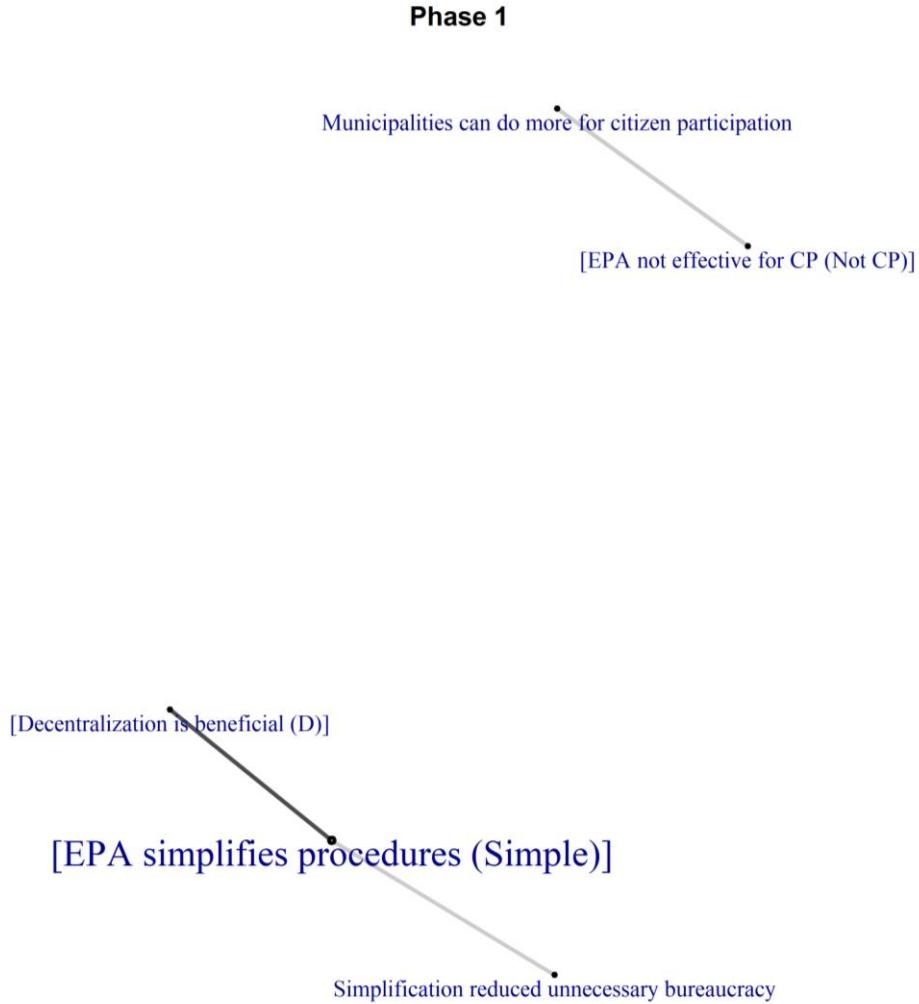


Figure 13. Storyline Congruence Network of Legislation Phase 1. Only storylines which are not isolated are included in each network. The size of storyline nodes reflects the number of occurrences, while the thickness of the edges reflects the number of co-occurrences.

Development Phase (2): Attitudes of Optimism and Scepticism

As visualised in Figure 14, public discourse in the second phase exhibited two distinct hub-and-spoke clusters of storylines, which are also loosely connected. This phase was characterised by a heavy focus on the policy's effectiveness on citizen participation; clusters are centred around two conflicting storylines, *[EPA is effective for CP (CP)]* and *[EPA is not effective for CP (Not CP)]*.

The discursive structure in this phase seems to be generally characterised by differing attitudes towards EPA on policy effectiveness.

The cluster of storylines agreeing to the effectiveness of citizen participation also emphasises other storylines like *[EPA is effective at sectoral integration]* and *[EPA has potential, but implementation is difficult]*—they generally share optimistic views

towards EPA. Conversely, the other cluster, disagreeing with the effectiveness of citizen participation, takes a more sceptical view towards EPA with storylines like *[Citizen participation leads to conflicts]*, *[EPA does not simplify procedures (Not Simple)]* or *[More direction and support from national government]*.

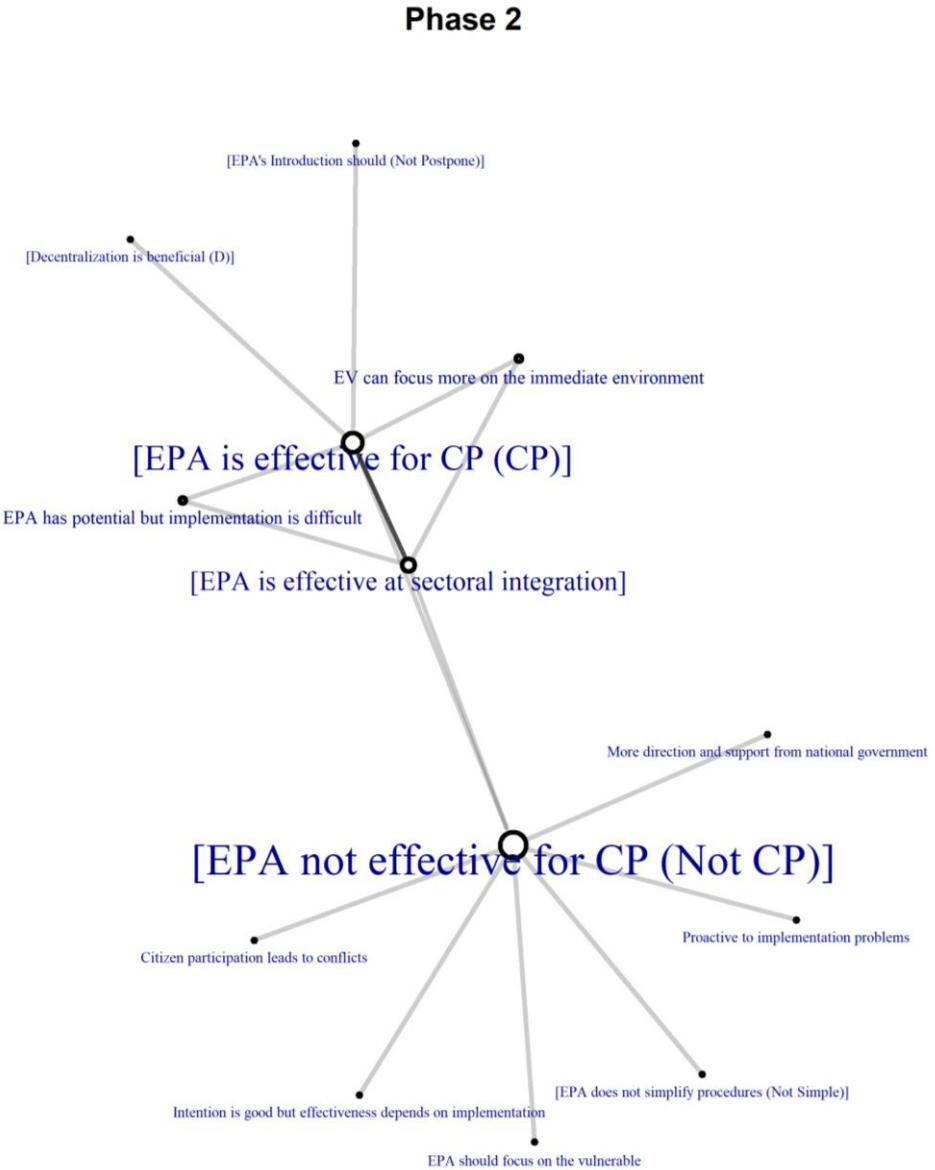


Figure 14. Storyline Congruence Network of Development Phase 2. Only storylines which are not isolated are included in each network. The size of storyline nodes reflects the number of occurrences, while the thickness of the edges reflects the number of co-occurrences.

Development Phase (3): Diverse Policy Beliefs

By the third phase, the structure of discourse has moved from a more centralised structure to a more decentralised structure where a ring topology is observed. The

storylines have also become broader, including more diverse issues of instrument logic and implementation. This is illustrated in Figure 15.

Storylines appear to be used more interconnectedly than in the previous structure, which was polarised based on attitude towards the policy. Storylines of conflicting nature have one degree of separation, e.g. *[Centralisation is needed instead]* is one storyline node away from *[Decentralisation is needed instead]*. This implies how actors with opposing storylines also share many similar ideas. In this specific issue of decentralisation or centralisation, the common storylines are *[EPA's Introduction should (Postpone)]* and *[Resources are lacking for municipalities]*—which are more closely related to implementation.

There are certain hints of collaboration where actors of very dissimilar ideas also mobilise common storylines that are believed to be very important, such as implementation.

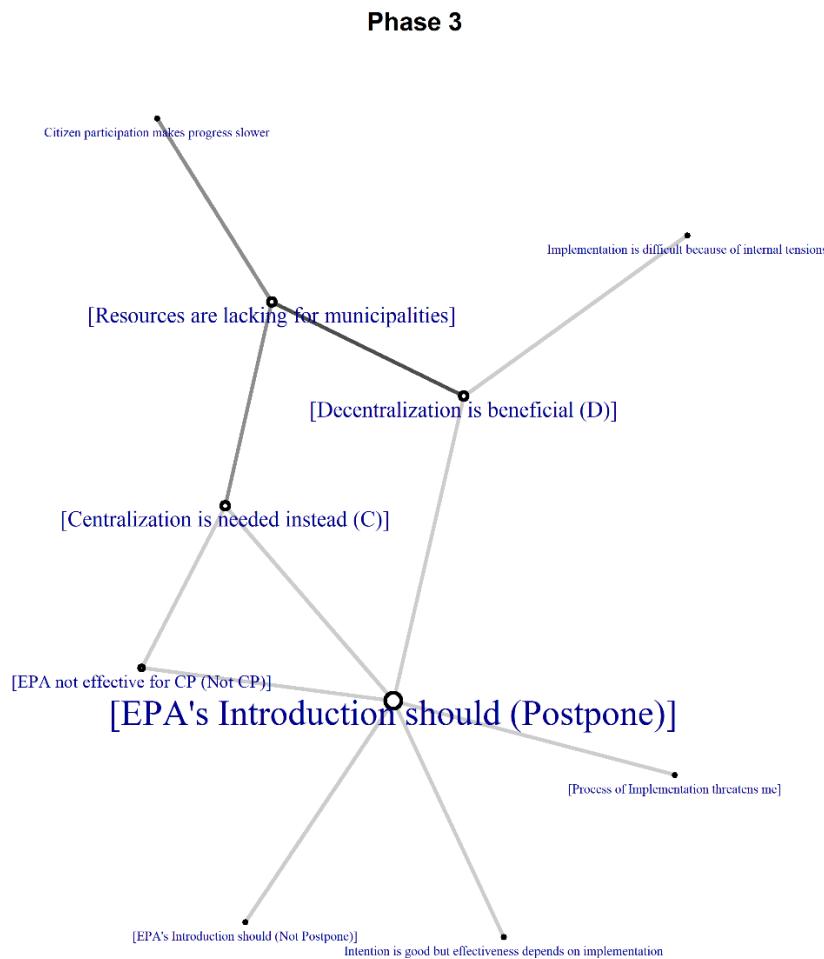


Figure 15. Storyline Congruence Network of Preparation Phase 3. Only storylines which are not isolated are included in each network. The size of storyline nodes reflects the number of occurrences, while the thickness of the edges reflects the number of co-occurrences.

Implementation Phase (4): Focus on Implementation or Policy Formulation

As illustrated in Figure 16, the discourse in the final phase moved towards two clusters again, but one is much denser than the other. The larger cluster is centred around the two storylines of [*EPA's introduction should (Not Postpone)*] and [*EPA's introduction should (Postpone)*], while the smaller cluster is centred around [*EPA is effective for CP (CP)*].

The storyline clusters appear to be divided based on implementation and policy formulation, in which implementation appears to be the main focus of the discourse. The large cluster largely involves implementation-related storylines such as [*Introducing EPA leads to legal issues*] and [*Implementation problems are inevitable*]. The smaller cluster involves more highly abstracted policy storylines such as [*Citizen participation leads to conflicts*] or [*Citizen participation makes progress slower*], which are negotiations to the policy objectives.

In the large cluster, it is unexpected that the storylines of (*Postpone*) and (*Not Postpone*) share some empirical storylines such as [*Introduction leads to legal issues*], [*EPA cannot be adjusted due to momentum*] or [*Implementation problems are inevitable*]. This implies how such conflicting normative positions can be based on the same facts. However, overall, the other storylines co-referenced to the (*Not Postpone*) storyline are more strategic, while the (*Postpone*) storyline has more focus on immediate and on-the-ground concerns.

Finally, it is also unexpected that storylines of (*Postpone*) and (*Not Postpone*) storylines are the most frequently co-referenced in this phase. Upon further investigation in Appendix F, rows 226-376, it is discovered that this is mostly due to the changing stances of actors during this phase but also a minority of arguments that ironically support both stances. These actors are all government actors.

Phase 4

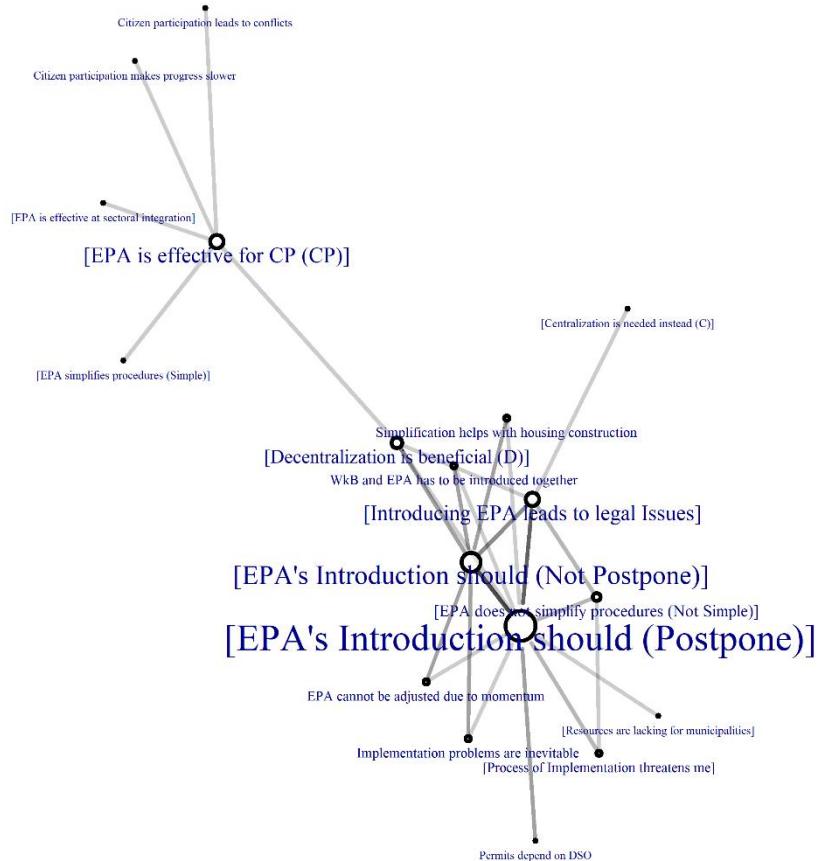


Figure 16. Storyline Congruence Network of Implementation Phase 4. Only storylines which are not isolated are included in each network. The size of storyline nodes reflects the number of occurrences, while the thickness of the edges reflects the number of co-occurrences.

5.6 Analysis of Actor Congruence Network

The actor congruence network describes how coalitions are structured, as well as how individual actors or actor types could contribute to the coalition-forming process. The actor congruence network based on the four policy phases is illustrated in Figure 17. Individual close-ups of each actor networks can be found in Appendix .

The nodes represent a single actor (individual or person), and the edges represent every instance in which they share a single storyline. The two actors connected represent ideational congruence and similarity in the storylines used. A tight cluster of storylines can be interpreted as a dominant coalition that mobilises frames to influence the policy process. The grey boundaries are generated by igraph’s community structure detection algorithm based on edge betweenness (Igraph Core Team, 2024)—whereby iteratively removing edges based on the highest edge betweenness, clusters are being

distinguished. The edges coloured in red represent the links between actor clusters; these are generally uncommon storylines that connect actors belonging to separate clusters.

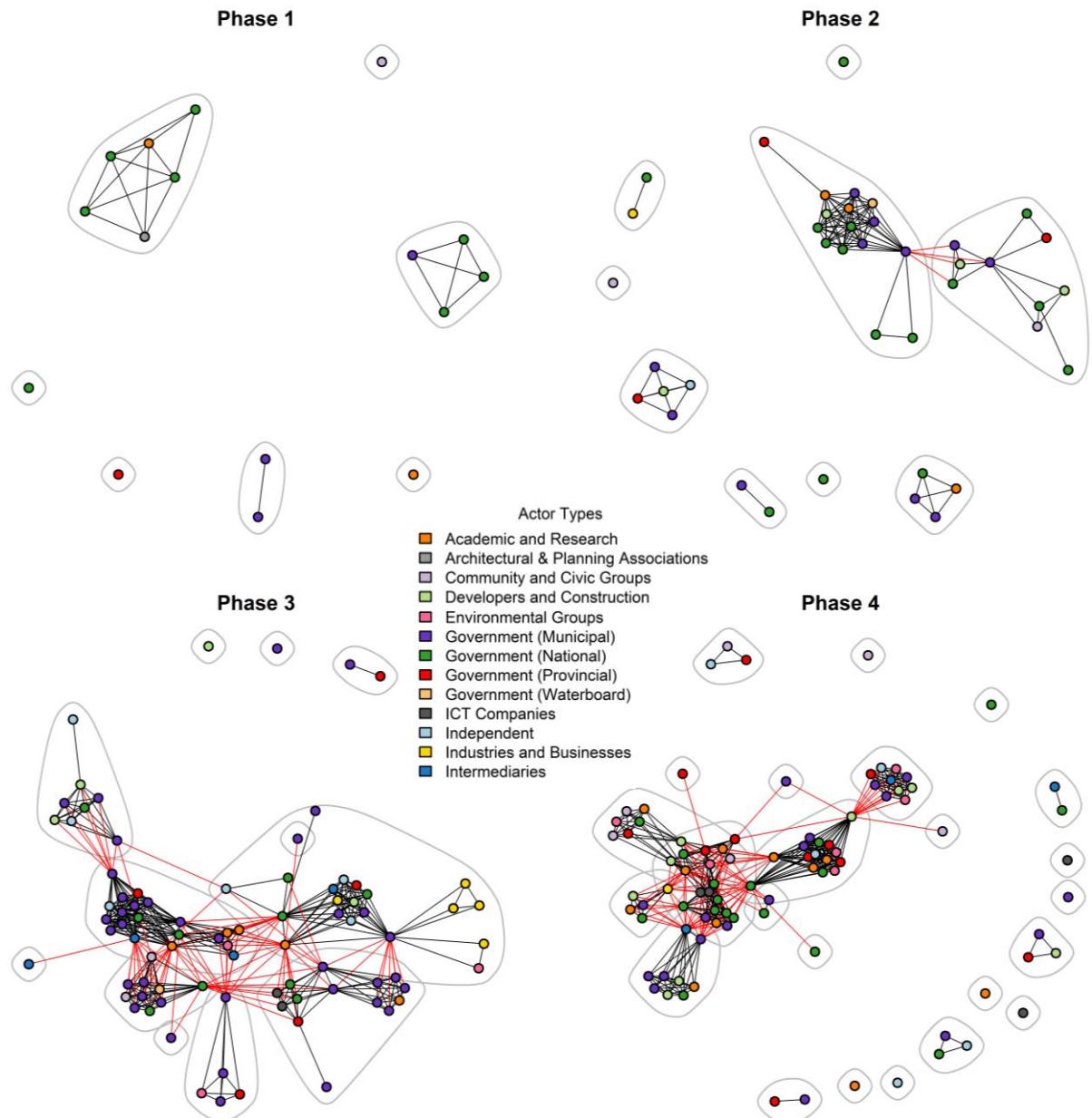


Figure 17. Actor Congruence Network of each phase of the policy. Grey boundaries reflect clusters detected by an edge-betweenness algorithm. Red edges note the connections between actor clusters.

Overall Structural Changes

Overall, the actor congruence network around EPA policy shows an increasingly clustered pattern between the phases. The actor congruence network began with disconnected and loose clusters in the Legislation Phase (1) but progressed into two

more distinctive clusters in the Development Phase (2). Next, in the Preparation Phase (3), more clusters start to emerge, where they are all similarly sized and connected loosely with one another. Lastly, in the Implementation Phase (4), the network exhibits a core-periphery structure, where the main cluster becomes tightly connected but connects a small cluster that is more distant from the centroid.

Legislation Phase (1): Isolated Clusters

In the initial phase, the network is observed to have several isolated clusters of actors, with early adopters predominantly being municipalities and the national government. This phase exhibits a highly fragmented structure (see Figure 17).

Development Phase (2): Two Evenly Distributed Clusters

In Development Phase (2), the network forms larger distinct clusters that are loosely connected. The actor communities are divided based on the issues discussed. During this phase, municipal governments are observed structurally to have the highest betweenness, where they employ storylines from the two distinctive actor clusters as indicated by the red edges in the network visualisation in Figure 17. This may imply how they could have brokerage roles in connecting coalitions with very different storylines.

Preparation Phase (3): Increasing Clusters and Assortativity

Preparation Phase (3) shows an increase in clusters and, overall, more inter-cluster connections (see Figure 17). The number of disconnected actors decreases.

Within the network, there is a fairly pronounced assortative or connection biases towards actor types; industries & businesses, as well as developers & construction actors, are largely located in the same clusters. In this phase, the academic & research and national government are observed to be “between” clusters, suggesting their increasing roles as brokers. Industries & businesses, as well as environmental groups, on the other hand, tend to occupy more peripheral roles in the network.

Implementation Phase (4): Uneven Distribution with a Dominant Cluster

In Phase 4, the network consists of two or three distinct actor clusters with visibly higher clustering density within them. Despite this, there are more disconnected actors compared to previous phases. The national government, as well as academic & research actors, are most prominently located in (or close topologically to) the centre of the biggest cluster, illustrating its core influence. The assortative structure is no longer observable in this phase.

6 Synthesis and Discussion

In this section, key findings are synthesised to bring more coherence to answering the research questions. Within each section, there will be a subsection that discusses the synthesised findings in relation to policy implementation as well as the methods.

6.1 (SRQ1) How is the public discourse surrounding EPA characterised?

Disputes within Public Discourse (Substantive Analysis; Section 5.2)

Overall, the public discourse surrounding EPA is greatly disputed, and policy issues regarding various policy components have varying natures of disagreements. In addition, the storyline and sub-storylines present significant ideational depth in reasoning and contextualising the issues.

Out of the most frequented issues, three of which are bipolarised in nature—it is believed that much of public discourse is influenced by such divisive conflicts that involve normative and empirical claims. Sub-storylines show some attempts to establish a middle ground through refuting empirical claims, but they are extremely limited (see Section 0). Bipolarised issues are also sustained throughout the public discourse, where they are unable to achieve discursive hegemony in opposing storylines throughout this duration. These issues could be consistently employed from the Development Phase (2) up till the introduction date; they are mostly issues referencing policy components on high-level or programme-level—namely *Instrument Logic* (Decentralise vs Centralise), *Effectiveness of Policy for Citizen Participation* (Effective vs Not Effective) (see Section 0).

Additionally, dispersed issues involve much disagreements too. Even with its wide spread of positions, they contribute to the attitude of increasing doubts and scepticism of EPA's promises. Within the issue of Prioritisation of Objectives, some storylines deviate greatly from EPA's intention, e.g., *Citizen participation makes progress slower*, others are in tune with emerging trends, e.g. *New noise standards hinder housing construction*, and finally, some opt for more balance, e.g. *EPA must strike a balance between using and protecting space* (see Section 0).

Finally, consensual issues, even as the minority, also contribute to the disputes by reflecting similar oppositions to EPA. An example would be *Threats from implementation*, which reflect the unintended consequences received as a result of the policy design and implementation (see Section 5.2.4).

Extensiveness of Public Discourse (Temporal Analysis; Section 5.3)

It was also observed that from the Legislative Phase (1) up to the Implementation Phase (4), there has been just an average rise in the number of issues, implying the increasing complexities of discourse as policy components are added to the discursive space (see Section 5.3.1). Also, the fact that issues (even those of policy formulation) were still engaged up to the implementation phase also implies how potentially many unresolved concerns and criticisms were not adequately addressed throughout the whole political process.

Influence of Actors in Public Discourse (Actor Analysis; Section 5.4)

In general, the influence of actors within public discourse is distinct and tends to be non-overlapping—with each actor shaping discourse in its own way. However, the extent of this influence varies, with some actors steering discourse more significantly than others.

Government actors are believed to exert the most influence on public discourse, as observed by the relatively high statement counts and their frequent shifts in storylines (see Section 5.4.2). Their active involvement in any issue or storyline often elevates its overall prominence.

Municipal and national governments also appear to have distinctly separate roles and responsibilities within the policy process, as reflected by their contribution to discourse. While there are minor overlaps in the involvement of issues by both levels of government, typically, it is one or the other that participates more greatly in a given issue (see Section 5.4.1).

Non-government actors also play a distinct role from government actors. They contribute to smaller issues that are generally oppositional, challenging the original intentions of EPA (see 5.4.1). There is also an association between each type of non-government actor and specific storylines, implying how their contribution to discourse could come from role-specific or interest-based perspectives.

6.1.1 Discussion of SRQ1

Implications for Policy Implementation

The content analysis conducted in this study holds much potential in addressing key factors that influence effective policy implementation. Bhuyan et al. (2010) identify seven critical dimensions that affect policy implementation, and this analysis reveals several of these dimensions.

Through substantive analysis, where polarisation types within the discourse are qualified, it describes "the policy, its formulation, and dissemination," a dimension that emphasises how policy content, the nature of its formulation, and the extent of its dissemination impact implementation. By qualifying the various policy issues, the analysis distinguishes between bipolarised issues (e.g. instrument logic), which involve

more fundamental disagreements, and dispersed issues (e.g. prioritisation of objectives) which might just require negotiation to achieve consensus. This information implies how specific issues ought to be addressed as part of the policy implementation process.

Furthermore, the temporal and actor analysis also inform "stakeholder involvement in policy implementation," a dimension that assesses the level of engagement stakeholders maintain throughout the process. The temporal analysis illustrates the sustenance of issues in public discourse over time, while the actor analysis uncovers how policymakers, implementers, and non-governmental actors contribute to these issues with minimal overlap. Although public discourse is not fully representative of the policy process, these findings suggest limited cross-actor engagement, highlighting potential gaps in responsibility-sharing.

Implications of Method

Content analysis of public discourse offers significant descriptive potential overall, allowing for both macro-level (quantitative) analysis through disaggregated content labels and micro-level (qualitative) analysis, where textual statements are thoroughly examined through labelling. Micro-level analysis, particularly through the structured investigation of text, can be invaluable for consolidating public opinion and informing policy recommendations. The use of nested or hierarchical content labels—such as issue, storyline, and sub-storyline—provides a structured method to deconstruct complex policy arguments. Additionally, the application of "issue" labels closely tied to policy components proves effective in directing diverse ideas toward specific aspects of the policy.

However, while content analysis characterises public discourse effectively, it alone cannot fully explain the dynamics of discursive change. The construction of public discourse is a collective process that should be understood structurally, considering how discourse coalitions mobilise storylines within a changing discursive context. These are then explored in subsequent sections (SRQ2 and SRQ3), where network analyses are employed.

6.2 (SRQ2) How does the public discourse evolve over the duration of the policy process?

The evolution of public discourse is examined through structural changes in the storyline congruence and actor congruence networks, respectively, which depict the changing discursive context and realignment of coalition structures across different phases.

Using the analytical framework for temporal analysis (established in Section 4.6), Figure 18 summarises the overall changes in public discourse using key findings from the content and network analyses. Each phase is described in detail below.

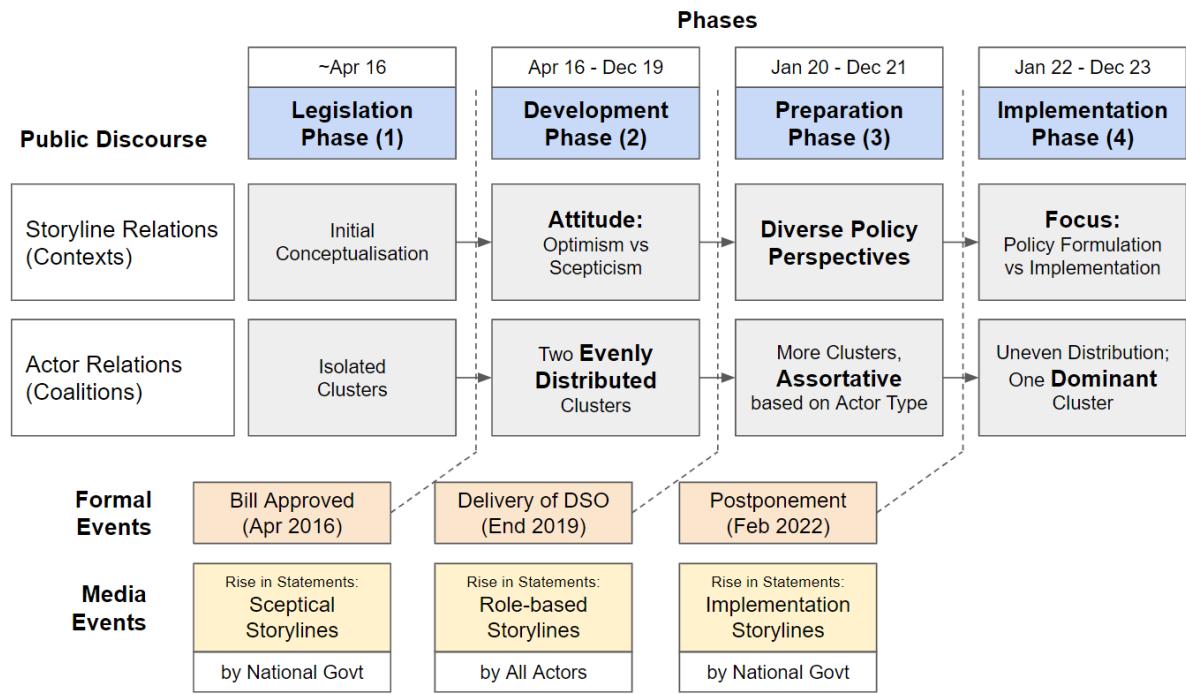


Figure 18. Analytical Framework of Temporal Analysis is filled with summarised findings from the content and network analysis. DSO refers to the Digital Infrastructure of EPA, a key instrument to the policy's operations.

Growing Scepticism at the start of Development Phase (2)

Growing scepticism around EPA began to emerge in the first half of 2016 at the start of the Development Phase (2). This was marked by the approval of the bill by the Senate and the spike in media interest around EPA. The top emerging storyline in 2016 was *[EPA not effective for CP (Not CP)]*, the first major storyline that was an antithesis to the original intent of EPA. The storyline was first mobilised by government actors but also later contributed by non-government actors such as community & civic groups and developers & construction.

The discursive context is then centred around attitudes towards EPA, i.e. generally optimistic or sceptical, marked by the two-cluster structure surrounding *[EPA effective for CP (CP)]* and *[EPA not effective for CP (Not CP)]* respectively in the storyline congruence network. The coalition structures also had two evenly distributed clusters, showing many ideational dissimilarities between the two coalitions. At this point, there are no observable patterns between actor types and coalitions.

Growing Disputes at the start of Preparation Phase (3)

Disputes began to surface at the start of 2020 towards the start of the Preparation Phase (3). This coincides with the delivery of the digital infrastructure (DSO) at the end of 2019. This is another spike in articles with newly mobilised storylines by various actors across a broad range of issues. This “broadness” plateaued in 2020 with the maximum involvement of 9-10 issues (see Figure 8).

There is growing contestation over the original intentions of EPA. The number of statements supporting centralisation had surpassed those supporting decentralisation in 2019 (see Section Figure 9), which is the second time an antithetical storyline dominated the issue momentarily. This was mostly mobilised by the municipal government and developers & construction actors.

The public discourse during the Preparation Phase (3) seems to shift towards a discursive context that explores a wide range of role-specific or interest-based perspectives. In the storyline congruence network, the simplistic structure centred around attitudes seems to have eroded—to a less hierarchical structure with more interconnectedness between a broad range of storylines (see Section 5.5). The complexity of discourse seems to be greatest here.

The “role-specific” nature of the discourse is illustrated in the actor congruence network, which shows a greater assortative structure where the same actors of the same type are more likely to be ideationally congruent—implying that their shared storylines are more reflective of their unique roles and interests (see Section 5.6).

Pressure to Implement at the start of Implementation Phase (4)

Towards Implementation Phase (4), at the start of 2022, there is increasing pressure to implement EPA, which coincides with a wave of postponement announcements (see Section 4.6.3). Between 2019 and 2021, there has been an overall greater share of implementation-related issues, such as *Stances on Implementation*, *Viability of Implementation* and *Threats from Implementation*. These storylines were largely mobilised by actors from the national government (see Appendix F; Row 67-225).

Around 2022, conflicts within implementation peaked where the issue of *Stance on Implementation* had the highest count including both (*Postpone*) and (*Not Postpone*) storylines (see Section 5.3.2). The rising prominence of this issue seems to be contributed by all actor types due to the countless postponements up to this point.

The public discourse evolved with a discursive context that has placed a greater focus on implementation issues, and policy formulation has become the minority. More interestingly, since they form different clusters, this suggests how respective focuses are competing for attention in the discourse space.

A statement in mid-2022 captured this phenomenon. The actor believes that the focus on implementation is marginalising calls to make policy adjustments.

(Dutch) “*Hij moest ‘zijn bek houden’, beet zijn baas hem toe. ‘Wij werken ons hier het snot voor de ogen om in woelige tijden de wet vooruit te helpen en jij steekt telkenmale een mes in onze rug’, was het verwijt.*”

(Translated) “*He had to ‘shut up’, his boss snapped at him. ‘We are working hard to advance the law in turbulent times and you keep sticking a knife in our back,’ was the accusation.*”

[Document References; Document 127]

This focus on implementation within public discourse also seems to be possibly influenced by the national government, as observed in the actor congruence network. They appear to be very central actors in the biggest clusters.

6.2.1 Discussion of SRQ2

Implications for Policy Implementation

A distinctive finding in SRQ2 is the observed misalignment between the evolving discursive context and the formal decision-making stages of policy. While the discursive context shifts in relation to each policy phase, public discourse seems to often address ideas tied to previous formal decisions.

For instance, during the Development Phase (2), the discourse primarily focuses on policy attitudes (optimism vs scepticism), even though the legislation has already been passed. Similarly, in the Preparation Phase (3), while the discourse expands to include various issues such as policy formulation, the development of the legislative foundations has already been established. This misalignment means that the diversity of ideas expressed in public discourse has a limited impact on influencing formal decisions.

Ideally, the Dutch legislative process is designed to incorporate consultative processes at each major stage to allow for stakeholder and public input (see Section 3.2). However, if actors voice their concerns only after decisions are made, it suggests that the consultation process may be inadequate. Boven and ‘t Hart (2016) argue that such “closing up of policy-making processes”—characterised by concentrating authority in too few hands, constraining the scope and duration of deliberation, and shutting down diversity and dissent” (p. 14)—can negatively impact policy outcomes. The current observations raise concerns that this suppression could adversely affect the policy-making process and its outcomes.

Implications of Methods

To illustrate the evolution of discourse, both the storyline congruence network and the actor congruence network were essential. However, the storyline congruence network is demonstrated to be more crucial in capturing changes in the discursive context.

The storyline congruence network is less commonly used in discourse network analysis, particularly because it is typically applied to more stable contexts like policy

change within stable policy subsystems (Leifeld, 2013; Markard et al., 2021). In contrast, this study demonstrates its utility in analysing faster-paced political processes, such as policy implementation, where discursive contexts shift more rapidly. This finding highlights the network's effectiveness in capturing dynamic changes in discourse that occur in response to evolving political and policy contexts.

6.3 (SRQ3) What are the responses of actors in this changing public discourse?

In addressing this sub-research question, identifying a “response” necessitates the corresponding “stimulus.” Here, the analytical framework depicted in Figure 18 is employed again. The “stimulus” comprises key formal events and prior discursive influences from earlier phases, while the “response” is observed in the changing role of the actor type in the actor congruence network.

Hence, SRQ3 will be answered largely from patterns of actor types within the actor congruence network (as outlined in Section 5.6), but it will also make references to the shifts in public discourse (findings from SRQ2).

Discursive Control from the Policymakers: National Government

The national government not only had the highest total statement count but also had the most significant role in shaping the public discourse. The mobilisation of storylines at the start of a phase is believed to subsequently shape the discourse in the rest of it:

In Development Phase (2), their mobilisation of the [*EPA not effective for CP (Not CP)*] storyline seems to be followed by more storylines contributed by various actor types that align to a similar sceptical attitude towards the consequences of the policy. Within that phase, this discursive context converged into a politics of attitudes characterised by conflicting sceptical and optimistic ideas.

Between the Preparation (3) and Implementation (4) Phase, their increasing mobilisation of implementation-related storylines has led to a discourse space that is mostly dominated by storylines involving implementation, pushing out discourse surrounding policy formulation. They are also observed to be ideationally central in coalitions, implying their leadership in sustaining issues on implementation.

The impact of national government actors on implementation is especially critical in the latter instance. The act of moving discourse towards implementation, consequently, moves political pressure away from policy formulation toward implementation, moving the weight of responsibilities from the national government towards the local governments (municipal, provincial, water board).

Defensive Responses of Implementers: Municipal, Provincial Government

The municipal government has the second-highest total statement count, not too far from the national government. The counts from the provincial government and waterboard are much smaller and limited. The overall responses from implementing organisations or implementers will be largely represented by the reactions of the municipal government.

The most prominent response of the municipal government is in relation to the overall shift in discourse toward implementation (partially caused by the National Government), which places them at the centre of political pressure. They adapted to this by taking a more defensive approach towards public discourse:

Initially, in the Development Phase (2), the municipal government was observed participating actively in a variety of issues concerning high-level abstraction and programme-level operationalisation components such as *Instrument logic* or *Effectiveness of Policy*. They were also seen to take more ideationally balanced positions on opposing views, as seen from their “betweenness” in the actor congruence network.

However, toward the Preparation Phase (3), policy disputes began emerging rapidly, which possibly led them to take up a defensive stance by retracting their participation in conflicting issues or policy formulation issues.

They mobilised storylines that attempted to attribute policy outcomes to decisions and powers out of their control, such as policy formulation or provision of resources. An example would be [*Resources are lacking for municipalities*] in 2021, which was the most used storyline of any actor in any year (see Appendix J).

By Implementation Phase (4), their overall participation in the public discourse has fallen.

Escalation from Initiators, Civil Society and Non-directly Affected

In public discourse, the non-government actors take a rather reactive than proactive position in all phases, i.e., they generally amplify the discursive context as opposed to shaping it themselves. This still plays a large part in the construction of the public discourse, even with their comparatively lower statement counts.

Their most prominent contribution is observed in the Preparation Phase (3) after DSO was delivered. They contributed greatly to smaller issues and less conflicting ones (i.e. dispersed issues), which began to topically broaden the discourse surrounding EPA by contributing their unique role and interest-based perspectives. They created enough political pressure for government actors to react in Implementation Phase 4.

Non-governmental actors are still unlikely to hold influential positions continuously, like ideational brokers or central actors, but their storylines are content-wise and not any less important in policy considerations.

6.3.1 Discussion of SRQ3

Implications for Policy Implementation

Findings regarding the reactions of implementers have the greatest implication for policy implementation as they play a direct role in delivering policy outcomes. As political pressure began to intensify following Preparation Phase (3), implementers began to adopt a more defensive stance. Findings also show how other actors contribute to this political pressure—a shift in attention towards implementation driven by policymakers, but also an escalation of political pressure caused by the initiators, civil society and non-directly affected.

These observations are consistent with other case studies showing that implementers often find themselves at the centre of policy controversies after significant events occur during the implementation stage (Boin et al., 2009). Such controversies can impact implementers' performance due to the added pressure and complications they face (Hinterleitner & Sager, 2015).

The effects of this defensive reaction on policy outcomes can be further contextualised within the Dutch governance system. According to Jaffe and Koster (2019), the Netherlands strategically grants considerable extents of autonomy and discretion to implementers, which is believed to enhance policy effectiveness. This aligns with Lipsky's (1980) concept of street-level bureaucracy in highlighting how bottom-up influences are useful for policymaking. Unfortunately, the growing defensiveness of implementers suggests that their general ability to influence policy is hindered by their shift in focus from contributing to policy discussions to defending the boundaries of their responsibilities.

Implications of Methods

The actor congruence network effectively captured the interactions between all actors in the policy accountability chain simultaneously, providing valuable insights into not only the key behaviour of implementers but also how other actors contribute to it.

The use of social network analysis techniques, such as community detection algorithms coupled with concepts of centralities, was particularly useful in highlighting the roles of different actor types within the network. This approach allowed for a nuanced understanding of how actors respond to shifts in public discourse, as evidenced by changes in their positions within the network.

6.4 Limitations

Some key limitations are also discussed to examine how the study's validity, reliability, and generalisability are affected.

Limitations of Data Source

The exploratory analyses have revealed that the newspaper sources can be quite a factor that affects the issues and storylines found due to their relation to the geographical context of the newspaper (see Section 5.1). Even when the methodology tries to manage this by emphasising diversity in the choice of newspaper sources, there are possibly some ideas within the discourse that could be very well left out in this analysis. As the data collected intends to represent much of the public debate, there must be some caution in generalising our observations.

This limitation is also unavoidable because there are resource constraints in the number of articles that can be coded by hand, especially because of such a high resolution of analysis of discourse. However, as various NLP methods (such as topic modelling) are increasingly advanced and accurate, one can opt for a semi-automatic or automatic methodology that decreases the cognitive workload on the coder, so including a larger dataset will be possible.

Validity of Coding and Its Influence on Analyses

The analysis primarily relies on actor and content variables that were manually coded by the author, making the accuracy of disaggregation a key concern. Despite extensive negotiations and feedback from supervisors, achieving complete accuracy in the categorization of the 4 actor groups, 13 actor type labels, 10 issue labels, 60 storyline labels, and 111 sub-storyline labels proved challenging. Even after 2-3 months, full objective certainty in the disaggregation process was not attainable, especially given the large dataset.

Given these challenges, it is important to discuss the implications of potential inaccuracies in the results and interpretations. While some degree of inaccuracy is inevitable in manual coding, understanding how these coding decisions influence the analysis is crucial for assessing the overall validity of the findings.

Coding of Actor Labels. Classifying the 13 actor type labels was particularly challenging, largely due to the case study's inclusion of a broad range of actors, as a spatial planning policy like EPA concerns everyone in the Netherlands. Coding difficulties arose from overlapping roles, such as environmental lawyers or legal professors, where tough decisions had to be made about how to categorise them.

However, the analysis did not heavily rely on these disaggregated labels, as the aggregated classification based on roles in the accountability chain (e.g., policymakers,

implementers, etc) was more directly relevant to understanding implementation impacts. The choice to maintain disaggregated categories aimed to avoid premature aggregation and the potential loss of key patterns. This approach proved valuable in Section 5.6, where assortative mixing within coalition structures was visually observed despite the less precise actor labels. While some findings may be affected by the inaccuracies in actor type labels, the overall reliability of key conclusions remains intact.

Coding of Content Labels. In the study, issue labels were primarily used to track broad content changes, particularly in relation to policy components—most notably, the increasing complexity of the discourse and the shift from high-level policy formulation to on-the-ground implementation. The most significant inaccuracies in issue labels arose when trying to represent diverse storylines, which are broad and require more contextual inference to group them topically. Consequently, storylines under dispersed issues were interpreted qualitatively rather than quantitatively to better capture the nature of the discourse.

Storylines are likely the most sensitive content labels, as they are the primary units for constructing the networks. Any inaccuracies could lead to incorrect ideational congruences within the storyline and actor congruence networks. While this does not significantly impact SR2, which focuses on "macro" structural changes, it could affect SRQ3, which examines "meso" level actor positions within the overall structure. However, since actors were mainly analysed using broad categories based on the accountability chain (policymakers, implementers, and citizens) rather than individual disaggregated types, the sensitivity to inaccurate links is reduced. With three broad groups of actor nodes and numerous links, a few inaccuracies should not substantially alter the validity of the findings.

Limitations of Methodology

Discourse network analysis was used to analyse public discourse around EPA by studying discourse content and relations over time—examining the evolving public discourse that shapes policy implementation.

The methodology, however, intends to be descriptive, which describes the endogenous and iterative process of the actors influencing and being influenced in the discursive construction process. Discourse network analysis is inherently limited in making explanatory claims about how and why certain observations happen, especially when attempting causal inferences, such as identifying stimulus and responses in SRQ3. In this research, assumptions and careful wording were employed to propose possible explanations for discourse changes or actor responses.

Nonetheless, beyond the scope of this thesis, more robust validation could be required to better explain the observed phenomena. This could be done through cross-

referencing with other media or press studies around the same context (Markard et al., 2021) or supplement analyses with interviews with relevant actors.

Limitations in Network Techniques

Additionally, a varying number of qualitative and quantitative techniques were used in network analysis to support the investigation; some require more caution when interpreting.

For instance, the community detection algorithm was used to identify discourse coalitions, and to distinguish between observations and interpretations, the term "clusters" was used instead of "coalitions" since a strict definition of coalitions was not applied theoretically. Instead, clusters observed in the network were used to describe coalition structures rather than to delineate specific coalitions.

Furthermore, there are multiple ways to calibrate the network to highlight structural characteristics. Leifeld (2019) provides an extensive guide on network considerations, such as normalisation, visual considerations, and edge thresholds. While some of these were explored, such as the calibration of edge thresholds (see Appendix K), they did not yield significant differences and were thus not utilised in the analysis.

7 Conclusion and Recommendations

7.1 What does the public discourse surrounding the Environment and Planning Act (EPA) in the Netherlands reveal about its policy implementation?

The analysis of public discourse surrounding the Environment and Planning Act (EPA) in the Netherlands provides valuable insights into both the policy implementation and the broader policy process.

Firstly, the public discourse offers a detailed perspective on the critical factors that significantly impact policy implementation. The findings highlight the nature of disagreements related to specific policy components, which suggests potential strategies for addressing these disputes. Additionally, the analysis reveals potential limitations in stakeholder engagement due to insufficient cross-actor collaboration and responsibility-sharing.

Secondly, the discourse illustrates the challenges inherent in managing a complex policy like EPA, particularly in balancing the need for policy adjustments with the urgency of its implementation. Even as public discourse evolves, the contents often reflect on past decisions made—these emphasise a necessity for better integration of stakeholder input into formal decision-making processes. This integration is crucial for ensuring that the policy is both effectively and efficiently introduced.

Finally, the findings illustrate how politics can be consequential to the policy implementation of EPA. Emerging political pressures driven by increasing disputes and shifting discourse attention towards implementation can diminish the key role of implementers in shaping the policy. As these pressures rose, implementers were observed to become more defensive and less involved in the discourse, which limits important feedback from the actors who are directly responsible for how the policy is enacted on the ground.

The analysis also highlights how other actors, especially policymakers, contribute to this political pressure, whether intentional or unintentional. This emphasises the importance of considering the entire policy accountability chain to fully understand how each actor can impact implementation outcomes both directly and indirectly.

7.2 Usefulness of Discourse Methods

This study employed the discourse network analysis methodology but involved a wide range of methods with several extensions and variations. This comprehensive approach

enhances the ability to examine public discourse from both content and network perspectives, incorporating both qualitative and quantitative analyses.

Content analysis, used to address SRQ1, was instrumental in describing the nature of public discourse and identifying critical factors that influence policy implementation. This was achieved through substantive analysis, which examined the polarisations within storylines and issues. Temporal and actor analyses also provided preliminary insights into the evolution of discourse and the roles of various actors, setting the stage for more detailed exploration in network analyses.

The network analysis employed to address SRQ2 offers significant explanatory potential for understanding how and why public discourse changes. By comparing shifts in the storyline and actor congruence networks with key events in the policy process, we can infer how structures of public discourse co-evolve with real-world events. The storyline congruence network, in particular, has proven exceptionally useful for capturing changes in the discursive context. It allows for a nuanced interpretation of storylines but also helps characterise the overall discourse space.

Furthermore, additional network techniques, such as community detection algorithms and centrality measures, provide valuable insights at the "meso-level." This is particularly evident in addressing SRQ3, where these techniques reveal how actors or actor types behave based on their positions within the network.

7.3 Recommendations

Scientific Recommendations

This research offers a novel contribution to the field of policy implementation by exploring the use of discourse network analysis, a methodology not commonly applied in this context. A notable innovation was the introduction of the "storyline congruence network," designed to capture the rapidly changing discursive context of a politically pressured policy process. Prior to this study, no research had utilised a storyline congruence network in this manner—more research can be done to establish a theoretical foundation for its analysis.

Future research could also further investigate a more general application of discourse networks in studying policy implementation, with a particular focus on validating and expanding the use of this methodology to observe both micro and macro-level political factors. More implementation researchers are encouraged to explore the potential of discourse network analysis to deepen our understanding of the politics of policy implementation.

Recommendations for Future Policy

While the primary aim of this thesis is descriptive rather than prescriptive, the analysis has revealed some key insights that may point to broad areas for future improvements, independent of normative perceptions of what constitutes the success of implementation.

First, there is a need to better prepare for complex policies and improve the policy process to ensure that ideas are more effectively integrated into formal decision-making. Currently, there appears to be a significant demand from various stakeholders for adjustments to the policy. Instead of allowing public discourse to hinder implementation, it could be leveraged more effectively to identify opportunities for improvement. This could involve expanding information channels or refining the planning stages of the policy process to better accommodate stakeholder input.

Second, empowering implementers is crucial, as they play a central role not only in the execution of policies but also in shaping policy formulation. However, implementers often face considerable vulnerability to political pressures, which can undermine their effectiveness. To address this, it would be beneficial to explore ways to strengthen their capacity, such as increasing the resources available to them and improving the flow of knowledge from the ground up. By doing so, implementers can be better supported in their roles and contribute more effectively to both policy implementation and development.

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Appendix A

(Interpretive Approaches)

A1 Interpretive Approaches

The study of discourse is a type of interpretive approach that aims to "understand and explain patterns of social construction, the role of discursive power and the dynamics of in- and exclusion in policymaking and policy implementation through concepts such as discourse, framing, narrative, practice and metaphor" (Van Hulst et al. 2024, p.2). Apart from discourse analysis, other interpretive approaches include frame analysis and narrative analysis.

This subsection identifies the similarities and differences between the various interpretive approaches to gain more clarity on the relevance of studying discourse. Much of this section will reference ideas discussed by Van Hulst et al. (2024), who developed a heuristic for selecting and understanding each approach.

A2 Similarities in Interpretive Approaches

Sharing similar motivations

According to Van Hulst et al. (2024), the reasons for the increasing interest in interpretive methods are as follows. First, there is an interest in the influential role of language in understanding and making decisions about policy and the wide variety of ways in which groups of people understand these issues. Second, they benefit from deconstructing societal power relations beyond struggles of interest. Thirdly, they acknowledge the social and political construction of knowledge production—since knowledge on policy issues is mediated by language and interpretation.

Sharing the same assumptions

The interpretive approaches share the same ontological, epistemological, and methodological assumptions in research methodology.

Ontological assumptions refer to how researchers perceive the nature of the world and of human beings. These interpretive approaches assume a constructivist ontology that socio-political reality is constructed by perspectives filled with meaning and are 'shaped, incrementally and painfully, in the struggle of everyday people with concrete, ambiguous, tenacious, practical problems and questions' (Hajer & Wagenaar 2003, p. 14).

Epistemological assumptions refer to how researchers deal with questions of knowledge and how knowledge is acquired. Interpretive approaches emphasise the subjective understanding of social phenomena. It assumes that the socio-political world does not have facts whose meaning is universal and beyond dispute. All

knowledge claims can be constructed and influence the world (Van Hulst et al., 2024; Hager & Wagenaar, 2003).

Methodological assumptions refer to the methods chosen to best analyse the object of interest. Interpretive approaches use methods that prioritise the understand of meanings, symbols and perspectives of the actors of interest within a context, e.g. citizens and professionals, whose lives and work are part of the socio-political context of investigation. The methods aim to create hermeneutic circles where actors are studied with their ability to iteratively co-generate knowledge in their context.

Sharing the same textual elements in the analysis

Based on a heuristic developed by Van Hulst et al. (2024) (see Figure X), they contend that all three approaches broadly study interpretation and meaning (actively negotiated within the context) through languages with different methods and concepts.

As such, they can share the same textual element of a "storyline" in the analysis even though they may be used for varying purposes dependent on the choice of discourse, frames or narrative analysis.

A3 Differences in Interpretive Approaches

Difference in Concept and Purpose

Even though these three approaches share similarities in studying language, they differ in concepts and purpose, as suggested by Van Hulst et al. (2024).

Discourses are, as defined by Hager (1995), an 'ensemble of ideas, concepts, and categories through which meaning is given to social and physical phenomena, and which is produced and reproduced through an identifiable set of practices' (p. 44). Discourse analysis focuses on the structure of power, dominance, silence, and hegemony, where linguistic structures visualise the power dynamics. Discourse analysis aims to understand the influence of discourse on our social realities.

Frames are an assembly of issue elements into meaningful constellations, i.e., issue, process, relation—where they are a notion of a problem or solution that highlights specific aspects and omits others. Framing analysis focuses on the differences between actors in how they construct meaning of and in policy processes or to understand how frames emerge, evolve or become dominant. Framing analysis tends to view language as the source of "power" (Van Hulst et al., 2024), and aims to capture how the construction of meaning can influence interactions, decisions and policies (Benford & Snow, 2000).

Narratives (or story) involve elements such as events, settings, characters. Narrative analysis focuses on how stories by the storyteller suggest a certain way to make sense of events and in that way can get things done (Van Hulst et al., 2024). Narrative analysis

aims to understand the influence of this storytelling to shape people's actions, attributing agency to narratives or even investigating human intentions.

Additionally, there is a proposed heuristic of the differing and overlapping features of the three approaches shown in Figure X as proposed by Van Hulst et al. (2024).

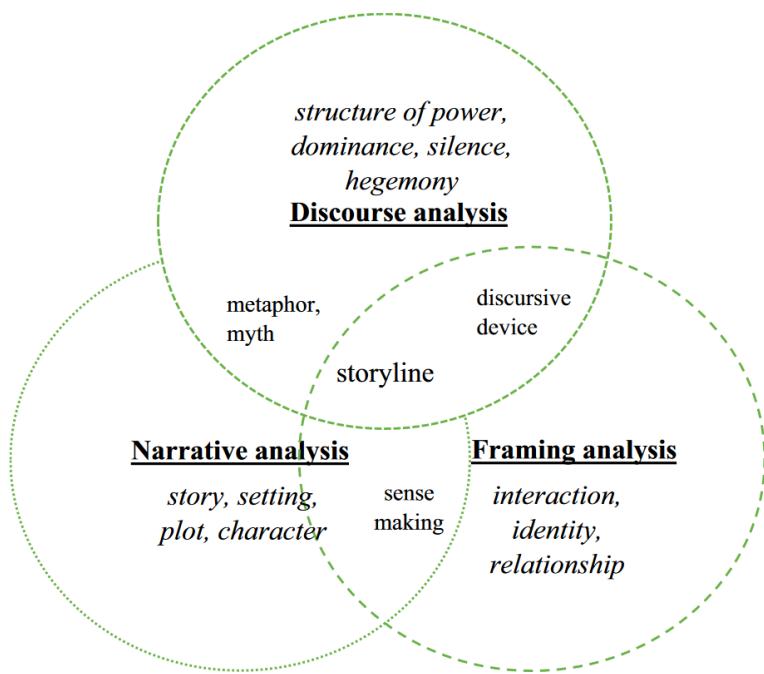


Figure A-1: Venn Diagram of distinctions and overlapping features of discourse, framing, and narrative analysis (Van Hulst et al., 2024)

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Appendix B

(Review of various Discourse Network Analysis studies)

Studies using discourse analysis have operationalised language/storylines and coalitions differently based on their respective research motivations. Here, we review several prominent works on a similar approach to inspire creating an analytical framework.

Different Operationalisations of Storylines

Since storylines are basic units of qualitative content, it is rather flexible and entirely possible to narrow down what they capture. Some scholars (Gupta et al., 2021; Schaub, 2021) have focused the coding of storylines on narrative elements in the Narrative Policy Framework (Jones & McBeth, 2010) such as character framing e.g. public statements that portray other actors as heroes, villains or victims. Its purpose lies in illuminating the strategic nature of narratives in statements of public discourse. Other scholars (Leifeld, 2013; Schaub, 2021) have also focused on beliefs since it is argued that “articulation of normative beliefs can be subsumed under the more general notion of discourse” (p. 5). They are used to conceptualise policy stability and policy change via ideas from the Advocacy Coalition Framework (Sabatier, 1988).

Different Operationalisations of Context

Contexts can be used differently in discourse analysis. In experimental research, the discursive context can be controlled to prevent the interference of shifting contexts on the results of discourse (Wagner & González-Howard, 2018). In some cross-sectional studies, the context is usually established qualitatively beforehand to interpret the discourse more accurately (Markard et al., 2021; Ohlendorf et al., 2023). In others, this is done in reverse where discourse patterns are used to study how the context evolves (Fairclough, 2013; McCarthy, 1992).

Different Operationalisations of Coalitions

The conceptualisation of coalition structures can also be very different and it affects how the relational aspects of actors and storylines are drawn. The two main conceptualisations applied in discourse analysis studies would be the advocacy coalition (2013) and discourse coalition (Leifeld & Haunss, 2012; Nagel & Satoh, 2019) which are in reference to the theories in Advocacy Coalition Framework (Sabatier, 1988) and Argumentative Discourse Analysis (Hajer, 1993) respectively. The difference according to Leifeld (2017) is that advocacy coalitions can deal with multiple issues (e.g. different policy instruments) at a time while discourse coalitions deal with one specific issue (i.e. the policy) at a time but with multiple justifications. Strategically, advocacy coalitions can be used to understand the broader process of policy change

while discourse coalitions target a more specific bipolarised policy issue (contained within a policy subsystem).

Different Operationalisations of Temporal Analyses

The dynamic nature of discourse is analysed differently; there are two main ways to slice up the full period of political debate into smaller subperiods to make temporal comparisons in discourse patterns. The first would be to slicing based on equal intervals across the political debate (Fergie et al., 2019; Nagel & Satoh, 2019; Schaub, 2021), and the second would be slicing based on specific time ranges aligned to the phases of the institutional decision-making process (Leifeld & Haunss, 2012; Markard et al., 2021).

Appendix C

(List of Actor Type Labels)

Table C-1: List of Actor Type and the Various Organisations coded under with its label

| Actor Type | List of Organisations |
|-------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Policymakers</i> | |
| Government (National) Incl: Ministers, Members of Senate, Independent Advisory Bodies | Ministry of Infrastructure and the Environment, Prime Minister, Netherlands Environmental Assessment Agency, Social and Cultural Planning Office, Member of Senate, National Obudsman, Cultural Heritage Agency of the Netherlands, Council of State, Aldermen's Association, Ministry for Housing and Spatial Planning of the Netherlands, Ministry of Interior, Committee of Environmental Impact Assessments, House of Representatives, ICT Testing Bureau, Advisory Committee of the Council of State, Minister of Agriculture, Nature and Food Quality, Council for Public Administration, Council for the Living Environment and Infrastructure, ICT Assessment Advisory Board, Advisory Committee on Land and Environmental Law, Council for Environment and Infrastructure, Council for the Environment and Infrastructure, Scientific Council for Government Policy, Ministry of Infrastructure and Water Management, Dutch Food and Consumer Product Safety Authority, Netherlands Interdisciplinary Demographic Institute |
| <i>Implementers</i> | |
| Government (Provincial) e.g. Officials, Advisory, Provincial Executives | Province of North Holland, Council of Public Adminstration in Zeeland, Province of South Holland, Northern Audit Office, Frisian Municipalities, Province of Groningen, Hus and Hiem Design Committee, Province of Fryslan, Human Environment and Transport Inspectorate, Special Coordinator North Brabant & Limburg, Fries Social Planning Office, North Holland Monuments & Archeology Support Center |
| Government (Municipal) e.g. Officials, Advisory, Joint Organisations | Municipality of Alphen aan den Rijn, Municipality of Leiden, Municipality of Utrecht, Association of Dutch Municipalities, Municipality of Noordwijk, Municipality of Katwijk, Municipality of The Hague, Municipality of Bunnik, Municipality of Krimpenerwaard, Municipality of Beek, Municipality of Voorschoten, Municipality of Bergen, Municipality of Olst-Wijhe, Municipality of Kraag en Braassem, Municipality of Aalsmeer, Municipality of Zoeterwoude, Municipality of Haarlemmermeer, Municipality of Amsterdam, Rotterdam, Utrecht, Ede, The Hague, Municipality of Rotterdam, Municipality of Sudwest Fryslan, Municipality of Leeuwarden, Municipality of Heerenveen, Municipality of Waadhoeke, Municipality of Heerenveen, Municipality of Terschelling, Municipality of De Fryske Marren, Municipality of Kaag en Braassem, Municipality of Amsterdam, Municipality of Maassluis, Municipality of Weststellingwerf, Municipality of Drachten, Municipality of Zoetermeer, Municipality of Eindhoven, Municipality of Nieuwkoop, Municipality of Alphen den Rijn, Dutch Association for Council Members, Municipality of |

| | |
|------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | Oude IJsselstreek, Council for Spatial Planning Oegstgeest, Municipality of Teylingen, Municipality of Oegstgeest, GGD, Municipality of Oegstgeest, Interior and the Association of Dutch Municipalities, Municipality of Asten, Municipality of Rheden, Municipality of Groningen, Municipality of Wassenaar |
| Government (Waterboard) | Union of Regional Water Authorities, Water Board of Vallei & Veluwe |
| <i>Initiators</i> | |
| Developers & Construction e.g. Developers, Construction Associations | Dunavie Housing Association, Jan de Lange (Sustainability Entrepreneur), Project Developer, Herman Weelink, Various Housing Experts, Independent Planologist, Royal NLengineers, Dura Vermeer, Tjalling Dijkstra (Initiator), Neprom, Independent Developer, Bouwend Nederland Trade Association, Netherlands Building and Housing Supervision Association, WoningbouwersNL, Peter de Ruyter (Landscape Architect), AG Nova Architects, SeARCH Architects |
| Intermediaries e.g Legal Firms, Consultants | Jan van der Grinten (Lawyer), Witteveen+Bos, Pericles Institute, Independent Constitutional Law Expert, Rho Adviseurs, Knepelhout Law Firm, TriaCon, Stout Groep |
| Industry and Businesses e.g Farmers, Agriculture | Independent Animal Feed Company, Farmers Defense Force, Herbert Schaap, Eddy Westra (Farmer), Intratuin, LTO Noord, VVEM |
| <i>Civil Society</i> | |
| Community & Civic Groups | Katwijk Tenants Platform Foundation, Eigen Huis Association, Independent Neighbourhood Activist, Resident's Delegation in Schipol Environmental Council, Rotterdam Naturally!, Residents of Oegstgeest, Droom en Daad Foundation, Association for Church Rental Management in the Protestant Church in the Netherlands, Protestant Community of Franeker, Residents of Groningen, Residents' organization Oosterparkwijk, Neighbourhood Association of Groningen |
| Environmental Groups | De Warren Natural Green, Nature and Environment North Holland, Frisian Environmental Federation, Citizen's Initiative Warren Naturally Green, Brabant Environmental Federation, All of North, One Garden, Mobilization for the Environment, Leidse Parks Platform, Natuurmonumenten, North Brabant Bat Reporting Network |
| Architectural & Planning Associations | World Heritage Site Foundation, De Roos Advocaten |
| <i>Non-directly Affected</i> | |
| ICT Companies i.e Official Software Providers | Tercera, Visma Roxit (Software), Cadac Group, Software Builder for DSO, Blendle Platform |
| Academic & Research | Open University of the Netherlands, Radboud University Nijmegen, TU Delft, Tilburg University, Leiden University of Applied Sciences, Wageningen University, VU Amsterdam, University of Groningen, Utrecht University, Erasmus University, University of Amsterdam, I&O Research, Maastricht University, Dutch Research Council |

| | |
|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Independent i.e Unaffiliated Individuals | NRC, Bjorn Bleumink, Christine Sijbesma, Michel Jehee, Pim de Vroomen, Maayke Houtman, Claudia Carelse, Domestic Governance, Dick Speijers, Mercel Gerritsen |
|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|

Appendix D

(List of All Content Labels)

Table D-1: Nested List of Issues (in Blue), Storyline (Bolded) and Sub-Storyline (Normal)

S* is statement counts on the storyline level, and SS** is on the sub-storyline level.

| Row | S* Count | SS** Count | Storyline |
|-----|----------|------------|-------------------------------------------------------------------------|
| 1 | 93 | 93 | Instrument Logic |
| 2 | 58 | | [Decentralization is beneficial (D)] |
| 3 | | 33 | (D) Decentralization allows local govt to set rules for protection |
| 4 | | 17 | (D) Decentralization provides local govt development opportunities |
| 5 | | 4 | (D) Decentralization allows municipalities to weigh interests better |
| 6 | | 1 | (D) Decentralization should not be blamed for non-spatial issues |
| 7 | | 2 | (D) Decentralization still allows for adequate environmental protection |
| 8 | | 1 | (D) Decentralization still allows for national goals |
| 9 | 35 | | [Centralization is needed instead (C)] |
| 10 | | 22 | (C) Decentralization loses coherence for national issues |
| 11 | | 5 | (C) Decentralization causes environmental standards to fall |
| 12 | | 2 | (C) Decentralization threatens roles of provinces |
| 13 | | 3 | (C) Market driven approach causes problems |
| 14 | | 1 | (C) Decentralization loses democratic legitimacy at regional level |
| 15 | | 1 | (C) Decentralization is used by national govt to avoid responsibility |
| 16 | | 1 | (C) "Yes, provided" makes it hard for protection |
| 17 | 26 | 26 | Prioritization of Objectives |
| 18 | 9 | 9 | New noise standards hinder housing construction |
| 19 | 5 | 5 | Citizen participation makes progress slower |
| 20 | 3 | 3 | Simplification helps with housing construction |
| 21 | 2 | 2 | Simplification is not better for planning |
| 22 | 2 | 2 | Simplification reduced unnecessary bureaucracy |
| 23 | 2 | 2 | EPA must strike a balance between using and protecting space |
| 24 | 2 | 2 | Citizen participation leads to conflicts |
| 25 | 1 | 1 | Simplification benefits initiators not government |
| 26 | 63 | 63 | Effectiveness of Policy (Citizen Participation) |
| 27 | 31 | | [EPA not effective for CP (Not CP)] |
| 28 | | 17 | (Not CP) EPA favours minority |
| 29 | | 7 | (Not CP) Implementation was lacking |
| 30 | | 5 | (Not CP) Municipalities have too much control |
| 31 | | 1 | (Not CP) Difficult to get participation |
| 32 | | 1 | (Not CP) EPA limits participation opportunities |
| 33 | 32 | | [EPA is effective for CP (CP)] |
| 34 | | 23 | (CP) Process involves citizens more |
| 35 | | 8 | (CP) Considers citizen interest better |
| 36 | | 1 | (CP) Simplification of rules improves citizen participation |

| | | | |
|----|----|----|----------------------------------------------------------------------|
| 37 | 25 | 25 | Effectiveness of Policy (Simplification) |
| 38 | 11 | | [EPA simplifies procedures (Simple)] |
| 39 | | 7 | (Simple) Rule bundling makes initiation process simpler |
| 40 | | 4 | (Simple) Rule bundling makes rules clearer |
| 41 | 14 | | [EPA does not simplify procedures (Not Simple)] |
| 42 | | 5 | (Not Simple) New rules are complicated for initiators |
| 43 | | 3 | (Not Simple) New rules are complicated for everyone |
| 44 | | 3 | (Not Simple) DSO is too complexly designed |
| 45 | | 2 | (Not Simple) Uncertainties in EPA complicates initiation |
| 46 | | 1 | (Not Simple) New rules are complicated for citizens |
| 47 | 8 | 8 | Effectiveness of Policy (Noise) |
| 48 | 6 | 6 | New noise standards are good to curb noise pollution |
| 49 | 2 | 2 | New noise standards does not deal with aviation |
| 50 | 12 | 12 | Effectiveness of Policy (Integration) |
| 51 | 12 | | [EPA is effective at sectoral integration] |
| 52 | | 3 | (Int) Instruments allows for integrated goals |
| 53 | | 3 | (Int) Instruments forces long-term planning |
| 54 | | 4 | (Int) Instruments provides an integrated planning framework |
| 55 | | 2 | (Int) Instruments stimulates better internal coordination |
| 56 | 20 | 20 | General Implementation Beliefs (Neutral Sentiments) |
| 57 | 4 | 4 | Implementing decentralization is difficult |
| 58 | 3 | 3 | Communication of progress was not transparent |
| 59 | 3 | 3 | EPA has potential but implementation is difficult |
| 60 | 1 | 1 | Implementing EPA is unpopular but necessary |
| 61 | 3 | 3 | Implementation is difficult because of internal tensions |
| 62 | 1 | 1 | Implementing EPA is good after postponements |
| 63 | 4 | 4 | Intention is good but effectiveness depends on implementation |
| 64 | 1 | 1 | Overfocus on implementation than policy adjustment |
| 65 | 29 | 29 | Threats from Implementation (Negative Sentiments) |
| 66 | 20 | | [Process of Implementation threatens me] |
| 67 | | 12 | System change delays progress |
| 68 | | 8 | Uncertainties from EPA causes risks to actors |
| 69 | 9 | | [New changes affect my interest negatively] |
| 70 | | 5 | New municipal plans affects my interest negatively |
| 71 | | 4 | New municipal rules affects my interest negatively |
| 72 | 65 | 65 | Viability of Implementation |
| 73 | 33 | | [Resources are lacking for municipalities] |
| 74 | | 9 | Municipalities have funding gaps for implementation |
| 75 | | 9 | Municipalities are understaffed for implementation |
| 76 | | 6 | Municipalites cannot prioritize EPA |
| 77 | | 6 | Municipalities take on too many new tasks |
| 78 | | 2 | Small municipalities are vulnerable |
| 79 | | 1 | Municipalities consume a lot of resources to implement EPA |
| 80 | 20 | | [Introducing EPA leads to legal Issues] |

| | | | |
|-----|----|----|---------------------------------------------------------------------------|
| 81 | | 10 | EPA is legally problematic |
| 82 | | 3 | Legal issues causes EPA to be ineffective |
| 83 | | 2 | System change causes lawsuits |
| 84 | | 2 | DSO will cause legal issues |
| 85 | | 1 | Alternative working methods is not legally valid |
| 86 | | 1 | EPA has legal foundation for housing construction |
| 87 | | 1 | Errors from DSO causes legal issues |
| 88 | 3 | 3 | DSO is too expensive |
| 89 | 1 | 1 | Decisions about EPA is too quick |
| 90 | 1 | 1 | DSO is not managed properly |
| 91 | 1 | 1 | DSO is too complexly designed and will not work |
| 92 | 1 | 1 | DSO is formulated too broad, makes it difficult to coordinate data |
| 93 | 1 | 1 | EPA cannot be adjusted due to momentum |
| 94 | 1 | 1 | Permits are not functioning as intended |
| 95 | 1 | 1 | Permits depend on DSO |
| 96 | 1 | 1 | Practicing EPA digitally is difficult |
| 97 | 1 | 1 | Requirements of EPA is not clear |
| 98 | 80 | 80 | Stances on Implementation |
| 99 | 32 | | [EPA's Introduction should (Postpone)] |
| 100 | | 11 | (Postpone) More time to work on DSO |
| 101 | | 9 | (Postpone) Introduction now is risky |
| 102 | | 8 | (Postpone) More time for municipalities to prepare |
| 103 | | 3 | (Postpone) More time for legal adjustments |
| 104 | | 1 | (Postpone) COVID-19 Delays |
| 105 | 19 | | [EPA's Introduction should (Not Postpone)] |
| 106 | | 6 | (Not Postpone) Preserve Momentum |
| 107 | | 3 | (Not Postpone) Postponement does not improve situation |
| 108 | | 2 | (Not Postpone) Prevent Additional costs |
| 109 | | 2 | (Not Postpone) Acceptable even if not smooth |
| 110 | | 2 | (Not Postpone) Municipality is ready |
| 111 | | 1 | (Not Postpone) EPA is urgently needed |
| 112 | | 1 | (Not Postpone) Implementation timelines is underestimated |
| 113 | | 1 | (Not Postpone) Disadvantage authorities sufficiently prepared |
| 114 | | 1 | (Not Postpone) DSO is ready |
| 115 | 3 | | [EPA should be cancelled (Cancel)] |
| 116 | | 3 | (Cancel) DSO is flawed |
| 117 | 1 | | [EPA should not be cancelled (Not Cancel)] |
| 118 | | 1 | (Not Cancel) Should not cancel even with problems |
| 119 | 6 | 6 | Municipalities can do more for citizen participation |
| 120 | 4 | 4 | More direction and support from national government |
| 121 | 2 | 2 | EPA should focus on the vulnerable |
| 122 | 1 | 1 | Terms of municipal councilors should be extended |
| 123 | 1 | 1 | Municipalities should not take extra tasks |
| 124 | 1 | 1 | More tasks for provinces |

| | | | |
|-----|---|---|-------------------------------------------------------|
| 125 | 1 | 1 | WkB and EPA has to be introduced together |
| 126 | 1 | 1 | Effect of WkB postponed |
| 127 | 1 | 1 | Proactive to implementation problems |
| 128 | 1 | 1 | EV can be more ambitious |
| 129 | 1 | 1 | EV can focus more on the immediate environment |
| 130 | 1 | 1 | Clearer Political Structures |
| 131 | 1 | 1 | DSO needs to be completed earlier |
| 132 | 1 | 1 | Government should prioritize DSO |
| 133 | 1 | 1 | More legal certainty |
| 134 | 1 | 1 | DSO should be simpler |

Appendix E

(Complete Dataset)

“eventlist_11_7.xlsx”

Link: https://github.com/RyanTanYiWei/DNA_OW/blob/main/eventlist_11_7.xlsx

Sheet: eventlist

Table D-1: Columns within “eventlist” sheet and a brief description

| Column | Brief Description |
|-----------------|----------------------------------------------------------|
| document_id | Document Variable from Article Metadata from Lexis Nexis |
| time | Document Variable from Article Metadata from Lexis Nexis |
| person | Coded Actor Label from article text |
| organization | Coded Actor Label from article text |
| actor_type | Coded Actor Label determined by coder |
| statement | Statement ID automated from DNA Software |
| summary | Summary of Text by coder |
| storyline | Coded Content Label determined by coder |
| sub_storyline | Coded Content Label determined by coder |
| issue | Coded Content Label determined by coder |
| text | Highlighted Text from Article |
| start_position | Start Text Position of Statement in Article |
| stop_position | End Text Position of Statement in Article |
| coder | Coder ID automated from DNA Software |
| document_source | Document Variable from Article Metadata from Lexis Nexis |

Appendix F

(Coded Statements Arranged Chronologically)

Table F-1: List of coded statements ordered with respect to time

| row | time | actor_type | organization | storyline | sub_storyline | issue |
|-----|--------------------|---------------------------------------|------------------------------------------------|------------------------------------------------------|-------------------------------------------------------------------------|-------------------------------------------------|
| 1 | 16/7/2011 2:00 | Academic & Research | Open University of the Netherlands | [EPA simplifies procedures (Simple)] | (Simple) Rule bundling makes initiation process simpler | Effectiveness of Policy (Simplification) |
| 2 | 16/7/2011 2:00 | Academic & Research | Open University of the Netherlands | [EPA simplifies procedures (Simple)] | (Simple) Rule bundling makes rules clearer | Effectiveness of Policy (Simplification) |
| 3 | 16/7/2011 2:00 | Academic & Research | Open University of the Netherlands | [Decentralization is beneficial (D)] | (D) Decentralization allows municipalities to weigh interests better | Instrument Logic |
| 4 | 13/4/2012 2:00 | Government (National) | Ministry of Infrastructure and the Environment | [EPA simplifies procedures (Simple)] | (Simple) Rule bundling makes initiation process simpler | Effectiveness of Policy (Simplification) |
| 5 | 13/4/2012 2:00 | Government (National) | Ministry of Infrastructure and the Environment | [Decentralization is beneficial (D)] | (D) Decentralization provides local govt development opportunities | Instrument Logic |
| 6 | 13/7/2013 2:00 | Government (National) | Prime Minister | [EPA simplifies procedures (Simple)] | (Simple) Rule bundling makes initiation process simpler | Effectiveness of Policy (Simplification) |
| 7 | 13/7/2013 2:00 | Government (National) | Ministry of Infrastructure and the Environment | [EPA simplifies procedures (Simple)] | (Simple) Rule bundling makes rules clearer | Effectiveness of Policy (Simplification) |
| 8 | 13/7/2013 2:00 | Government (National) | Prime Minister | [Decentralization is beneficial (D)] | (D) Decentralization still allows for adequate environmental protection | Instrument Logic |
| 9 | 13/7/2013 2:00 | Government (National) | Prime Minister | Simplification reduced unnecessary bureaucracy | Simplification reduced unnecessary bureaucracy | Prioritization of objectives |
| 10 | 13/7/2013 2:00 | Government (National) | Ministry of Infrastructure and the Environment | Simplification reduced unnecessary bureaucracy | Simplification reduced unnecessary bureaucracy | Prioritization of objectives |
| 11 | 15/1/2014 1:00 | Government (Provincial) | Province of North Holland | [Centralization is needed instead (C)] | (C) Decentralization threatens roles of provinces | Instrument Logic |
| 12 | 30/10/2015 1:00 | Architectural & Planning Associations | World Heritage Site Foundation | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 13 | 18/1/2016 1:00 | Government (Municipal) | Municipality of Alphen aan den Rijn | [EPA not effective for CP (Not CP)] | (Not CP) EPA favours minority | Effectiveness of Policy (Citizen Participation) |
| 14 | 30/1/2016 1:00 | Government (National) | Netherlands Environmental Assessment Agency | [Decentralization is beneficial (D)] | (D) Decentralization still allows for adequate environmental protection | Instrument Logic |
| 15 | 4/2/2016 1:00 | Government (National) | Social and Cultural Planning Office | [EPA not effective for CP (Not CP)] | (Not CP) EPA favours minority | Effectiveness of Policy (Citizen Participation) |
| 16 | 4/2/2016 1:00 | Government (National) | Social and Cultural Planning Office | [EPA not effective for CP (Not CP)] | (Not CP) EPA favours minority | Effectiveness of Policy (Citizen Participation) |
| 17 | 4/2/2016 1:00 | Government (National) | Social and Cultural Planning Office | [EPA not effective for CP (Not CP)] | (Not CP) Implementation was lacking | Effectiveness of Policy (Citizen Participation) |
| 18 | 4/2/2016 1:00 | Government (National) | Social and Cultural Planning Office | [EPA not effective for CP (Not CP)] | (Not CP) Implementation was lacking | Effectiveness of Policy (Citizen Participation) |
| 19 | 4/2/2016 1:00 | Government (National) | Social and Cultural Planning Office | Municipalities can do more for citizen participation | Municipalities can do more for citizen participation | Stances on Implementation |

| | | | | | | |
|----|--------------------|------------------------------|------------------------------------------------------|----------------------------------------------------------------|-----------------------------------------------------------------------------|-------------------------------------------------------|
| 20 | 13/2/2016 1:00 | Government (National) | Social and Cultural Planning Office | [EPA not effective for CP (Not CP)] | (Not CP) EPA favours minority | Effectiveness of Policy (Citizen Participation) |
| 21 | 2/3/2016 1:00 | Community & Civic Groups | Katwijk Tenants Platform Foundation | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 22 | 18/3/2016 1:00 | Government (Municipal) | Municipality of Leiden | [EPA is effective at sectoral integration] | (Int) Instruments allows for integrated goals | Effectiveness of Policy (Integration) |
| 23 | 18/3/2016 1:00 | Government (Municipal) | Municipality of Leiden | [EPA is effective at sectoral integration] | (Int) Instruments forces long-term planning | Effectiveness of Policy (Integration) |
| 24 | 18/3/2016 1:00 | Government (Municipal) | Municipality of Utrecht | [EPA is effective at sectoral integration] | (Int) Instruments stimulates better internal coordination | Effectiveness of Policy (Integration) |
| 25 | 18/3/2016 1:00 | Government (National) | Member of Senate | [EPA does not simplify procedures (Not Simple)] | (Not Simple) New rules are complicated for initiators | Effectiveness of Policy (Simplification) |
| 26 | 18/3/2016 1:00 | Academic & Research | Radboud University Nijmegen | [Introducing EPA leads to legal Issues] | Legal issues causes EPA to be ineffective | Viability of Implementation |
| 27 | 28/4/2016 2:00 | Government (National) | National Obudsman | [EPA is effective for CP (CP)] | (CP) Considers citizen interest better | Effectiveness of Policy (Citizen Participation) |
| 28 | 1/6/2016 2:00 | Community & Civic Groups | Eigen Huis Association | Simplification benefits initiators not government | Simplification benefits initiators not government | Prioritization of objectives |
| 29 | 4/6/2016 2:00 | Government (Waterboard) | Union of Regional Water Authorities | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 30 | 13/9/2016 2:00 | Government (National) | Cultural Heritage Agency of the Netherlands | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 31 | 16/12/2016 1:00 | Government (Municipal) | Association of Dutch Municipalities | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 32 | 12/1/2017 1:00 | Government (Municipal) | Municipality of Leiden | [Resources are lacking for municipalities] | Municipalites cannot prioritize EPA | Viability of Implementation |
| 33 | 12/1/2017 1:00 | Government (Municipal) | Municipality of Leiden | Requirements of EPA is not clear | Requirements of EPA is not clear | Viability of Implementation |
| 34 | 21/1/2017 1:00 | Government (Municipal) | Municipality of Noordwijk | [EPA is effective for CP (CP)] | (CP) Considers citizen interest better | Effectiveness of Policy (Citizen Participation) |
| 35 | 21/1/2017 1:00 | Government (Municipal) | Municipality of Noordwijk | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 36 | 21/1/2017 1:00 | Government (Municipal) | Municipality of Noordwijk | [Decentralization is beneficial (D)] | (D) Decentralization provides local govt development opportunities | Instrument Logic |
| 37 | 4/3/2017 1:00 | Government (Municipal) | Municipality of Katwijk | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 38 | 1/5/2017 2:00 | Government (National) | Ministry of Infrastructure and the Environment | [Decentralization is beneficial (D)] | (D) Decentralization provides local govt development opportunities | Instrument Logic |
| 39 | 1/5/2017 2:00 | Government (National) | Ministry of Infrastructure and the Environment | [Decentralization is beneficial (D)] | (D) Decentralization provides local govt development opportunities | Instrument Logic |
| 40 | 15/6/2017 2:00 | Developers & Construction | Dunavie Housing Association | [EPA is effective for CP (CP)] | (CP) Considers citizen interest better | Effectiveness of Policy (Citizen Participation) |
| 41 | 15/6/2017 2:00 | Developers & Construction | Jan de Lange (Sustainability Entrepreneur) | [Decentralization is beneficial (D)] | (D) Decentralization provides local govt development opportunities | Instrument Logic |
| 42 | 2/9/2017 2:00 | Government (National) | Council of State | [New changes affect my interest negatively] | New municipal plans affects my interest negatively | Threats from Implementation |

| | | | | | | |
|----|--------------------|---------------------------|--------------------------------------------------------------|------------------------------------------------------|--------------------------------------------------------------------|-------------------------------------------------|
| 43 | 2/9/2017 2:00 | Industries & Businesses | Independent Animal Feed Company | [New changes affect my interest negatively] | New municipal plans affects my interest negatively | Threats from Implementation |
| 44 | 16/10/2017 2:00 | Government (Municipal) | Municipality of Noordwijk | [EPA's introduction should (Not Postpone)] | (Not Postpone) Municipality is ready | Stances on Implementation |
| 45 | 2/11/2017 1:00 | Academic & Research | TU Delft | [Decentralization is beneficial (D)] | (D) Decentralization still allows for national goals | Instrument Logic |
| 46 | 12/1/2018 1:00 | Government (Municipal) | Municipality of Leiden | [EPA is effective for CP (CP)] | (CP) Considers citizen interest better | Effectiveness of Policy (Citizen Participation) |
| 47 | 12/1/2018 1:00 | Government (Municipal) | Municipality of Leiden | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 48 | 12/1/2018 1:00 | Government (Municipal) | Municipality of Leiden | [EPA not effective for CP (Not CP)] | (Not CP) Difficult to get participation | Effectiveness of Policy (Citizen Participation) |
| 49 | 12/1/2018 1:00 | Government (Municipal) | Municipality of Leiden | [EPA is effective at sectoral integration] | (Int) Instruments forces long-term planning | Effectiveness of Policy (Integration) |
| 50 | 12/1/2018 1:00 | Government (Municipal) | Municipality of Leiden | [EPA is effective at sectoral integration] | (Int) Instruments provides an integrated planning framework | Effectiveness of Policy (Integration) |
| 51 | 12/1/2018 1:00 | Government (Municipal) | Municipality of Leiden | EPA has potential but implementation is difficult | EPA has potential but implementation is difficult | General Implementation Beliefs |
| 52 | 12/1/2018 1:00 | Government (Municipal) | Municipality of The Hague | [Decentralization is beneficial (D)] | (D) Decentralization provides local govt development opportunities | Instrument Logic |
| 53 | 12/1/2018 1:00 | Government (Municipal) | Municipality of Leiden | EV can focus more on the immediate environment | EV can focus more on the immediate environment | Stances on Implementation |
| 54 | 20/3/2018 1:00 | Government (Provincial) | Council of Public Administration in Zeeland | [EPA simplifies procedures (Simple)] | (Simple) Rule bundling makes initiation process simpler | Effectiveness of Policy (Simplification) |
| 55 | 24/3/2018 1:00 | Academic & Research | Tilburg University | [Resources are lacking for municipalities] | Municipalities take on too many new tasks | Viability of Implementation |
| 56 | 4/4/2018 2:00 | Government (Municipal) | Municipality of Bunnik | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 57 | 25/4/2018 2:00 | Government (Provincial) | Province of South Holland | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 58 | 23/5/2018 2:00 | Developers & Construction | Project Developer | [EPA not effective for CP (Not CP)] | (Not CP) Implementation was lacking | Effectiveness of Policy (Citizen Participation) |
| 59 | 21/6/2018 2:00 | Government (National) | Aldermen's Association | [Resources are lacking for municipalities] | Municipalities are understaffed for implementation | Viability of Implementation |
| 60 | 9/7/2018 2:00 | Government (National) | Ministry for Housing and Spatial Planning of the Netherlands | [Decentralization is beneficial (D)] | (D) Decentralization provides local govt development opportunities | Instrument Logic |
| 61 | 28/9/2018 2:00 | Community & Civic Groups | Independent Neighbourhood Activist | [EPA not effective for CP (Not CP)] | (Not CP) EPA favours minority | Effectiveness of Policy (Citizen Participation) |
| 62 | 11/10/2018 2:00 | Government (National) | Ministry of Interior | Implementing EPA is unpopular but necessary | Implementing EPA is unpopular but necessary | General Implementation Beliefs |
| 63 | 11/10/2018 2:00 | Government (National) | Ministry of Interior | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 64 | 24/10/2018 2:00 | Academic & Research | Leiden University of Applied Sciences | [EPA simplifies procedures (Simple)] | (Simple) Rule bundling makes rules clearer | Effectiveness of Policy (Simplification) |
| 65 | 24/10/2018 2:00 | Academic & Research | Leiden University of Applied Sciences | Municipalities can do more for citizen participation | Municipalities can do more for citizen participation | Stances on Implementation |

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|----|--------------------|---------------------------|-----------------------------------------------|---------------------------------------------------------------|--------------------------------------------------------------------|-------------------------------------------------|
| 66 | 14/11/2018 1:00 | Academic & Research | Leiden University of Applied Sciences | [Decentralization is beneficial (D)] | (D) Decentralization provides local govt development opportunities | Instrument Logic |
| 67 | 16/3/2019 1:00 | Government (Provincial) | Province of South Holland | [EPA is effective at sectoral integration] | (Int) Instruments provides an integrated planning framework | Effectiveness of Policy (Integration) |
| 68 | 16/3/2019 1:00 | Independent | NRC | [Centralization is needed instead (C)] | (C) Decentralization threatens roles of provinces | Instrument Logic |
| 69 | 30/3/2019 1:00 | Government (Municipal) | Municipality of Krimpenerwaard | [EPA is effective for CP (CP)] | (CP) Considers citizen interest better | Effectiveness of Policy (Citizen Participation) |
| 70 | 30/3/2019 1:00 | Government (Municipal) | Municipality of Krimpenerwaard | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 71 | 9/7/2019 2:00 | Government (Municipal) | Municipality of Beek | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 72 | 8/10/2019 2:00 | Government (Municipal) | Municipality of Voorschoten | [Resources are lacking for municipalities] | Municipalities are understaffed for implementation | Viability of Implementation |
| 73 | 8/10/2019 2:00 | Government (Municipal) | Municipality of Voorschoten | [Resources are lacking for municipalities] | Municipalities have funding gaps for implementation | Viability of Implementation |
| 74 | 28/11/2019 1:00 | Government (National) | Committee of Environmental Impact Assessments | [EPA is effective at sectoral integration] | (Int) Instruments allows for integrated goals | Effectiveness of Policy (Integration) |
| 75 | 28/11/2019 1:00 | Government (Municipal) | Municipality of Bergen | Implementing decentralization is difficult | Implementing decentralization is difficult | General Implementation Beliefs |
| 76 | 28/11/2019 1:00 | Government (National) | House of Representatives | Intention is good but effectiveness depends on implementation | Intention is good but effectiveness depends on implementation | General Implementation Beliefs |
| 77 | 28/11/2019 1:00 | Government (National) | Member of Senate | [EPA's Introduction should (Not Postpone)] | (Not Postpone) Implementation timelines is underestimated | Stances on Implementation |
| 78 | 28/11/2019 1:00 | Government (National) | Ministry of Interior | [EPA's Introduction should (Not Postpone)] | (Not Postpone) Preserve Momentum | Stances on Implementation |
| 79 | 28/11/2019 1:00 | Government (National) | National Obudsman | [EPA's Introduction should (Postpone)] | (Postpone) Introduction now is risky | Stances on Implementation |
| 80 | 28/11/2019 1:00 | Government (National) | Member of Senate | [Introducing EPA leads to legal Issues] | EPA is legally problematic | Viability of Implementation |
| 81 | 28/11/2019 1:00 | Government (Municipal) | Municipality of Bergen | Decisions about EPA is too quick | Decisions about EPA is too quick | Viability of Implementation |
| 82 | 28/11/2019 1:00 | Government (National) | ICT Testing Bureau | DSO is too complexly designed and will not work | DSO is too complexly designed and will not work | Viability of Implementation |
| 83 | 9/12/2019 1:00 | Developers & Construction | Herman Weelink | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 84 | 9/12/2019 1:00 | Developers & Construction | Herman Weelink | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 85 | 9/12/2019 1:00 | Developers & Construction | Herman Weelink | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 86 | 12/12/2019 1:00 | Government (National) | National Obudsman | [EPA not effective for CP (Not CP)] | (Not CP) EPA favours minority | Effectiveness of Policy (Citizen Participation) |
| 87 | 12/12/2019 1:00 | Government (National) | National Obudsman | [EPA not effective for CP (Not CP)] | (Not CP) EPA favours minority | Effectiveness of Policy (Citizen Participation) |
| 88 | 12/12/2019 1:00 | Government (National) | National Obudsman | [EPA does not simplify procedures (Not Simple)] | (Not Simple) New rules are complicated for everyone | Effectiveness of Policy (Simplification) |

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|-----|--------------------|---------------------------|----------------------------------|---------------------------------------------------------------|--------------------------------------------------------------------|-------------------------------------------------|
| 89 | 12/12/2019 1:00 | Government (National) | National Obudsman | Implementing decentralization is difficult | Implementing decentralization is difficult | General Implementation Beliefs |
| 90 | 12/12/2019 1:00 | Government (National) | National Obudsman | Intention is good but effectiveness depends on implementation | Intention is good but effectiveness depends on implementation | General Implementation Beliefs |
| 91 | 12/12/2019 1:00 | Government (National) | National Obudsman | Citizen participation leads to conflicts | Citizen participation leads to conflicts | Prioritization of objectives |
| 92 | 12/12/2019 1:00 | Government (National) | National Obudsman | EPA should focus on the vulnerable | EPA should focus on the vulnerable | Stances on Implementation |
| 93 | 12/12/2019 1:00 | Government (National) | National Obudsman | More direction and support from national government | More direction and support from national government | Stances on Implementation |
| 94 | 12/12/2019 1:00 | Government (National) | National Obudsman | Proactive to implementation problems | Proactive to implementation problems | Stances on Implementation |
| 95 | 22/1/2020 1:00 | Government (Municipal) | Municipality of Leiden | [Decentralization is beneficial (D)] | (D) Decentralization provides local govt development opportunities | Instrument Logic |
| 96 | 23/1/2020 1:00 | Developers & Construction | Various Housing Experts | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 97 | 23/1/2020 1:00 | Developers & Construction | Various Housing Experts | [EPA does not simplify procedures (Not Simple)] | (Not Simple) New rules are complicated for initiators | Effectiveness of Policy (Simplification) |
| 98 | 8/2/2020 1:00 | Government (Municipal) | Municipality of Olst-Wijhe | Intention is good but effectiveness depends on implementation | Intention is good but effectiveness depends on implementation | General Implementation Beliefs |
| 99 | 10/2/2020 1:00 | Academic & Research | TU Delft | [Resources are lacking for municipalities] | Municipalities have funding gaps for implementation | Viability of Implementation |
| 100 | 11/2/2020 1:00 | Intermediaries | Jan van der Grinten (Lawyer) | Citizen participation makes progress slower | Citizen participation makes progress slower | Prioritization of objectives |
| 101 | 11/2/2020 1:00 | Independent | NRC | [Resources are lacking for municipalities] | Municipalities take on too many new tasks | Viability of Implementation |
| 102 | 12/2/2020 1:00 | Government (National) | National Obudsman | [EPA not effective for CP (Not CP)] | (Not CP) EPA favours minority | Effectiveness of Policy (Citizen Participation) |
| 103 | 21/2/2020 1:00 | Government (Municipal) | Municipality of Kraag en Braasem | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 104 | 4/3/2020 1:00 | Government (Municipal) | Municipality of Voorschoten | [Process of Implementation threatens me] | System change delays progress | Threats from Implementation |
| 105 | 14/3/2020 1:00 | Developers & Construction | Independent Planologist | Simplification is not better for planning | Simplification is not better for planning | Prioritization of objectives |
| 106 | 31/3/2020 2:00 | Developers & Construction | Royal NLengineers | [EPA is effective for CP (CP)] | (CP) Simplification of rules improves citizen participation | Effectiveness of Policy (Citizen Participation) |
| 107 | 31/3/2020 2:00 | Intermediaries | Witteveen+Bos | [EPA not effective for CP (Not CP)] | (Not CP) EPA favours minority | Effectiveness of Policy (Citizen Participation) |
| 108 | 2/4/2020 2:00 | ICT Companies | Tercera | Communication of progress was not transparent | Communication of progress was not transparent | General Implementation Beliefs |
| 109 | 2/4/2020 2:00 | Government (National) | Ministry of Interior | Implementation is difficult because of internal tensions | Implementation is difficult because of internal tensions | General Implementation Beliefs |
| 110 | 2/4/2020 2:00 | ICT Companies | Tercera | [EPA should be cancelled (Cancel)] | (Cancel) DSO is flawed | Stances on Implementation |
| 111 | 2/4/2020 2:00 | Government (National) | Ministry of Interior | [EPA's Introduction should (Postpone)] | (Postpone) COVID-19 Delays | Stances on Implementation |
| 112 | 2/4/2020 2:00 | ICT Companies | Visma Roxit (Software) | [EPA's Introduction should (Postpone)] | (Postpone) Introduction now is risky | Stances on Implementation |
| 113 | 8/5/2020 2:00 | Government (National) | Council of State | [Introducing EPA leads to legal Issues] | EPA is legally problematic | Viability of Implementation |

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|-----|--------------------|----------------------------|---------------------------------------------------------------|----------------------------------------------------------|--------------------------------------------------------------------|-------------------------------------------------|
| 114 | 15/5/2020 2:00 | Government (Municipal) | Municipality of Katwijk | Implementation is difficult because of internal tensions | Implementation is difficult because of internal tensions | General Implementation Beliefs |
| 115 | 6/7/2020 2:00 | Government (Municipal) | Municipality of Aalsmeer | New noise standards does not deal with aviation | New noise standards does not deal with aviation | Effectiveness of Policy (Noise) |
| 116 | 6/7/2020 2:00 | Government (Provincial) | Province of North Holland | New noise standards does not deal with aviation | New noise standards does not deal with aviation | Effectiveness of Policy (Noise) |
| 117 | 6/7/2020 2:00 | Government (Municipal) | Municipality of Aalsmeer | New noise standards hinder housing construction | New noise standards hinder housing construction | Prioritization of objectives |
| 118 | 28/7/2020 2:00 | Government (National) | Ministry of Interior | [Decentralization is beneficial (D)] | (D) Decentralization provides local govt development opportunities | Instrument Logic |
| 119 | 28/7/2020 2:00 | Government (Waterboard) | Water Board of Vallei & Veluwe | [Decentralization is beneficial (D)] | (D) Decentralization provides local govt development opportunities | Instrument Logic |
| 120 | 20/10/2020 2:00 | Government (Municipal) | Municipality of Zoeterwoude | [Process of Implementation threatens me] | Uncertainties from EPA causes risks to actors | Threats from Implementation |
| 121 | 18/11/2020 1:00 | Industries & Businesses | Farmers Defense Force | [New changes affect my interest negatively] | New municipal rules affects my interest negatively | Threats from Implementation |
| 122 | 28/11/2020 1:00 | Government (Municipal) | Municipality of Haarlemmermeer | [EPA simplifies procedures (Simple)] | (Simple) Rule bundling makes initiation process simpler | Effectiveness of Policy (Simplification) |
| 123 | 28/11/2020 1:00 | Government (Municipal) | Municipality of Haarlemmermeer | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 124 | 28/11/2020 1:00 | Government (Municipal) | Municipality of Haarlemmermeer | New noise standards hinder housing construction | New noise standards hinder housing construction | Prioritization of objectives |
| 125 | 4/12/2020 1:00 | Academic & Research | Wageningen University | [Centralization is needed instead (C)] | (C) Decentralization causes environmental standards to fall | Instrument Logic |
| 126 | 4/12/2020 1:00 | Academic & Research | Wageningen University | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 127 | 9/12/2020 1:00 | ICT Companies | Tercera | [EPA's Introduction should (Postpone)] | (Postpone) Introduction now is risky | Stances on Implementation |
| 128 | 9/12/2020 1:00 | Government (National) | Member of Senate | [EPA's Introduction should (Postpone)] | (Postpone) Introduction now is risky | Stances on Implementation |
| 129 | 9/12/2020 1:00 | Government (National) | Advisory Committee of the Council of State | [EPA's Introduction should (Postpone)] | (Postpone) More time to work on DSO | Stances on Implementation |
| 130 | 5/1/2021 1:00 | Industries & Businesses | Herbert Schaap | [EPA not effective for CP (Not CP)] | (Not CP) EPA favours minority | Effectiveness of Policy (Citizen Participation) |
| 131 | 9/1/2021 1:00 | Government (Municipal) | Municipality of Aalsmeer | New noise standards hinder housing construction | New noise standards hinder housing construction | Prioritization of objectives |
| 132 | 21/1/2021 1:00 | Government (National) | Member of Senate | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 133 | 27/1/2021 1:00 | Government (Municipal) | Municipality of Amsterdam, Rotterdam, Utrecht, Ede, The Hague | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 134 | 27/1/2021 1:00 | Government (Municipal) | Municipality of Rotterdam | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 135 | 6/2/2021 1:00 | Independent | Bjorn Bleumink | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 136 | 9/2/2021 1:00 | Government (Provincial) | Northern Audit Office | [EPA not effective for CP (Not CP)] | (Not CP) Implementation was lacking | Effectiveness of Policy (Citizen Participation) |

| | | | | Municipalities can do more for citizen participation | Municipalities can do more for citizen participation | Stances on Implementation |
|-----|----------------|-------------------------|----------------------------------|---------------------------------------------------------------|--------------------------------------------------------------------|-------------------------------------------------|
| 137 | 13/2/2021 1:00 | Environmental Groups | De Warren Natural Green | Municipalities can do more for citizen participation | Municipalities can do more for citizen participation | Stances on Implementation |
| 138 | 13/2/2021 1:00 | Industries & Businesses | Eddy Westra (Farmer) | [New changes affect my interest negatively] | New municipal plans affects my interest negatively | Threats from Implementation |
| 139 | 19/2/2021 1:00 | Industries & Businesses | Intratuin | Municipalities can do more for citizen participation | Municipalities can do more for citizen participation | Stances on Implementation |
| 140 | 23/2/2021 1:00 | Industries & Businesses | LTO Noord | [New changes affect my interest negatively] | New municipal plans affects my interest negatively | Threats from Implementation |
| 141 | 26/2/2021 1:00 | Government (Municipal) | Municipality of Sudwest Fryslan | [EPA is effective for CP (CP)] | (CP) Considers citizen interest better | Effectiveness of Policy (Citizen Participation) |
| 142 | 26/2/2021 1:00 | Government (Municipal) | Municipality of Leeuwarden | [EPA not effective for CP (Not CP)] | (Not CP) EPA favours minority | Effectiveness of Policy (Citizen Participation) |
| 143 | 26/2/2021 1:00 | Government (Municipal) | Municipality of Sudwest Fryslan | More direction and support from national government | More direction and support from national government | Stances on Implementation |
| 144 | 26/2/2021 1:00 | Government (Municipal) | Municipality of Heerenveen | [EPA's Introduction should (Not Postpone)] | (Not Postpone) Postponement does not improve situation | Stances on Implementation |
| 145 | 26/2/2021 1:00 | Government (Provincial) | Frisian Municipalities | [EPA's Introduction should (Not Postpone)] | (Not Postpone) Preserve Momentum | Stances on Implementation |
| 146 | 26/2/2021 1:00 | Government (Provincial) | Frisian Municipalities | [EPA's Introduction should (Not Postpone)] | (Not Postpone) Prevent Additional Costs | Stances on Implementation |
| 147 | 26/2/2021 1:00 | Government (Provincial) | Frisian Municipalities | [EPA's Introduction should (Postpone)] | (Postpone) More time to work on DSO | Stances on Implementation |
| 148 | 26/2/2021 1:00 | Government (Municipal) | Municipality of Waadhoeke | [EPA's Introduction should (Postpone)] | (Postpone) More time to work on DSO | Stances on Implementation |
| 149 | 26/2/2021 1:00 | Government (Municipal) | Municipality of Heerenveen | [Resources are lacking for municipalities] | Municipalities have funding gaps for implementation | Viability of Implementation |
| 150 | 26/2/2021 1:00 | Government (Municipal) | Municipality of Sudwest Fryslan | [Resources are lacking for municipalities] | Small municipalities are vulnerable | Viability of Implementation |
| 151 | 26/2/2021 1:00 | Government (Municipal) | Municipality of Terschelling | Practicing EPA digitally is difficult | Practicing EPA digitally is difficult | Viability of Implementation |
| 152 | 1/3/2021 1:00 | Government (Provincial) | Province of Groningen | [Resources are lacking for municipalities] | Municipalities have funding gaps for implementation | Viability of Implementation |
| 153 | 4/3/2021 1:00 | Academic & Research | Wageningen University | [EPA not effective for CP (Not CP)] | (Not CP) EPA favours minority | Effectiveness of Policy (Citizen Participation) |
| 154 | 4/3/2021 1:00 | Academic & Research | Wageningen University | Intention is good but effectiveness depends on implementation | Intention is good but effectiveness depends on implementation | General Implementation Beliefs |
| 155 | 4/3/2021 1:00 | Academic & Research | Wageningen University | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 156 | 4/3/2021 1:00 | Academic & Research | Wageningen University | [EPA's Introduction should (Postpone)] | (Postpone) More time for municipalities to prepare | Stances on Implementation |
| 157 | 4/3/2021 1:00 | Academic & Research | Wageningen University | [EPA's Introduction should (Postpone)] | (Postpone) More time to work on DSO | Stances on Implementation |
| 158 | 9/3/2021 1:00 | Government (Municipal) | Municipality of De Fryske Marren | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 159 | 13/3/2021 1:00 | Intermediaries | Pericles Institute | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 160 | 13/3/2021 1:00 | Intermediaries | Pericles Institute | Citizen participation makes progress slower | Citizen participation makes progress slower | Prioritization of objectives |
| 161 | 13/3/2021 1:00 | Intermediaries | Pericles Institute | [Resources are lacking for municipalities] | Municipalities are understaffed for implementation | Viability of Implementation |

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|-----|-------------------|-------------------------|--------------------------------------------------|----------------------------------------------------------|-----------------------------------------------------------------------|-------------------------------------------------|
| 162 | 13/3/2021 1:00 | Intermediaries | Pericles Institute | [Resources are lacking for municipalities] | Municipalities are understaffed for implementation | Viability of Implementation |
| 163 | 13/3/2021 1:00 | Intermediaries | Pericles Institute | [Resources are lacking for municipalities] | Municipalities are understaffed for implementation | Viability of Implementation |
| 164 | 25/3/2021 1:00 | Industries & Businesses | LTO Noord | [New changes affect my interest negatively] | New municipal plans affects my interest negatively | Threats from Implementation |
| 165 | 30/3/2021 2:00 | Government (Municipal) | Municipality of Kaag en Braassem | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 166 | 2/4/2021 2:00 | Government (Municipal) | Municipality of Heerenveen | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 167 | 13/4/2021 2:00 | Government (National) | Minister of Agriculture, Nature and Food Quality | [EPA not effective for CP (Not CP)] | (Not CP) EPA limits participation opportunities | Effectiveness of Policy (Citizen Participation) |
| 168 | 13/4/2021 2:00 | Government (National) | Minister of Agriculture, Nature and Food Quality | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 169 | 13/4/2021 2:00 | Government (National) | Minister of Agriculture, Nature and Food Quality | [Introducing EPA leads to legal Issues] | EPA is legally problematic | Viability of Implementation |
| 170 | 13/4/2021 2:00 | Government (National) | Minister of Agriculture, Nature and Food Quality | DSO is too expensive | DSO is too expensive | Viability of Implementation |
| 171 | 15/4/2021 2:00 | Independent | Christine Sijbesma | [EPA not effective for CP (Not CP)] | (Not CP) EPA favours minority | Effectiveness of Policy (Citizen Participation) |
| 172 | 23/4/2021 2:00 | Government (Municipal) | Municipality of Amsterdam | [Process of Implementation threatens me] | System change delays progress | Threats from Implementation |
| 173 | 23/4/2021 2:00 | Academic & Research | VU Amsterdam | [Process of Implementation threatens me] | Uncertainties from EPA causes risks to actors | Threats from Implementation |
| 174 | 24/4/2021 2:00 | Independent | NRC | [EPA does not simplify procedures (Not Simple)] | (Not Simple) New rules are complicated for initiators | Effectiveness of Policy (Simplification) |
| 175 | 24/4/2021 2:00 | Government (Municipal) | Municipality of Maassluis | [Resources are lacking for municipalities] | Municipalities take on too many new tasks | Viability of Implementation |
| 176 | 1/5/2021 2:00 | Independent | Michel Jehee | [EPA not effective for CP (Not CP)] | (Not CP) EPA favours minority | Effectiveness of Policy (Citizen Participation) |
| 177 | 1/5/2021 2:00 | Independent | Michel Jehee | [EPA is effective at sectoral integration] | (Int) Instruments provides an integrated planning framework | Effectiveness of Policy (Integration) |
| 178 | 1/5/2021 2:00 | Government (National) | Council of State | Implementation is difficult because of internal tensions | Implementation is difficult because of internal tensions | General Implementation Beliefs |
| 179 | 1/5/2021 2:00 | Government (Municipal) | Association of Dutch Municipalities | [Centralization is needed instead (C)] | (C) Decentralization is used by national govt to avoid responsibility | Instrument Logic |
| 180 | 1/5/2021 2:00 | Intermediaries | Independent Constitutional Law Expert | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 181 | 1/5/2021 2:00 | Government (National) | Council of State | [Centralization is needed instead (C)] | (C) Decentralization loses democratic legitimacy at regional level | Instrument Logic |
| 182 | 1/5/2021 2:00 | Government (Municipal) | Association of Dutch Municipalities | Clearer Political Structures | Clearer Political Structures | Stances on Implementation |
| 183 | 1/5/2021 2:00 | Government (Municipal) | Association of Dutch Municipalities | More tasks for provinces | More tasks for provinces | Stances on Implementation |
| 184 | 1/5/2021 2:00 | Government (National) | Council of State | Municipalities should not take extra tasks | Municipalities should not take extra tasks | Stances on Implementation |

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|-----|--------------------|---------------------------|--------------------------------------|------------------------------------------------------|--------------------------------------------------------------------|-------------------------------------------------|
| 185 | 1/5/2021 2:00 | Government (Municipal) | Association of Dutch Municipalities | More legal certainty | More legal certainty | Stances on Implementation |
| 186 | 1/5/2021 2:00 | Government (Municipal) | Association of Dutch Municipalities | [Resources are lacking for municipalities] | Municipalities take on too many new tasks | Viability of Implementation |
| 187 | 1/5/2021 2:00 | Government (Municipal) | Association of Dutch Municipalities | [Resources are lacking for municipalities] | Municipalities take on too many new tasks | Viability of Implementation |
| 188 | 1/5/2021 2:00 | Government (National) | Council of State | [Resources are lacking for municipalities] | Small municipalities are vulnerable | Viability of Implementation |
| 189 | 22/5/2021 2:00 | Government (Municipal) | Municipality of Waadhoeke | [Process of Implementation threatens me] | System change delays progress | Threats from Implementation |
| 190 | 22/5/2021 2:00 | Government (Municipal) | Municipality of Leeuwarden | DSO is too expensive | DSO is too expensive | Viability of Implementation |
| 191 | 29/5/2021 2:00 | Government (Municipal) | Municipality of Weststellingwerf | [Resources are lacking for municipalities] | Municipalities have funding gaps for implementation | Viability of Implementation |
| 192 | 5/6/2021 2:00 | Academic & Research | University of Groningen | [Centralization is needed instead (C)] | (C) Market driven approach causes problems | Instrument Logic |
| 193 | 15/6/2021 2:00 | Government (Municipal) | Municipality of Drachten | [Resources are lacking for municipalities] | Municipalities have funding gaps for implementation | Viability of Implementation |
| 194 | 18/6/2021 2:00 | Government (Municipal) | Municipality of Zoetermeer | [Resources are lacking for municipalities] | Municipalities have funding gaps for implementation | Viability of Implementation |
| 195 | 24/6/2021 2:00 | Government (National) | Council for Public Administration | [Resources are lacking for municipalities] | Municipalites cannot prioritize EPA | Viability of Implementation |
| 196 | 2/7/2021 2:00 | Environmental Groups | Nature and Environment North Holland | New noise standards hinder housing construction | New noise standards hinder housing construction | Prioritization of objectives |
| 197 | 29/7/2021 2:00 | Government (Municipal) | Municipality of Katwijk | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 198 | 29/7/2021 2:00 | Government (Municipal) | Municipality of Katwijk | New noise standards are good to curb noise pollution | New noise standards are good to curb noise pollution | Effectiveness of Policy (Noise) |
| 199 | 9/8/2021 2:00 | Developers & Construction | Herman Weelink | [EPA not effective for CP (Not CP)] | (Not CP) EPA favours minority | Effectiveness of Policy (Citizen Participation) |
| 200 | 24/8/2021 2:00 | Community & Civic Groups | Eigen Huis Association | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 201 | 25/8/2021 2:00 | Government (Municipal) | Municipality of Leeuwarden | [EPA not effective for CP (Not CP)] | (Not CP) EPA favours minority | Effectiveness of Policy (Citizen Participation) |
| 202 | 25/8/2021 2:00 | Government (Municipal) | Municipality of Leeuwarden | Municipalities can do more for citizen participation | Municipalities can do more for citizen participation | Stances on Implementation |
| 203 | 25/8/2021 2:00 | Government (Municipal) | Municipality of Leeuwarden | [New changes affect my interest negatively] | New municipal rules affects my interest negatively | Threats from Implementation |
| 204 | 25/8/2021 2:00 | Government (Municipal) | Municipality of Leeuwarden | [Process of Implementation threatens me] | Uncertainties from EPA causes risks to actors | Threats from Implementation |
| 205 | 14/9/2021 2:00 | Government (Municipal) | Municipality of Leeuwarden | [EPA not effective for CP (Not CP)] | (Not CP) Implementation was lacking | Effectiveness of Policy (Citizen Participation) |
| 206 | 2/10/2021 2:00 | Government (Municipal) | Municipality of Weststellingwerf | [Resources are lacking for municipalities] | Municipalities have funding gaps for implementation | Viability of Implementation |
| 207 | 23/10/2021 2:00 | Government (Municipal) | Municipality of Eindhoven | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |

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|-----|--------------------|--------------------------|--------------------------------------------------------|------------------------------------------------------|----------------------------------------------------------------------|---------------------------------|
| 208 | 5/11/2021 1:00 | Community & Civic Groups | Resident's Delegation in Schipol Environmental Council | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 209 | 24/11/2021 1:00 | Environmental Groups | Frisian Environmental Federation | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 210 | 24/11/2021 1:00 | Environmental Groups | Frisian Environmental Federation | [Centralization is needed instead (C)] | (C) Market driven approach causes problems | Instrument Logic |
| 211 | 25/11/2021 1:00 | Academic & Research | TU Delft | [Centralization is needed instead (C)] | (C) Market driven approach causes problems | Instrument Logic |
| 212 | 25/11/2021 1:00 | Academic & Research | TU Delft | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 213 | 6/12/2021 1:00 | Government (National) | Ministry of Interior | [Decentralization is beneficial (D)] | (D) Decentralization allows municipalities to weigh interests better | Instrument Logic |
| 214 | 6/12/2021 1:00 | Government (National) | Ministry of Interior | [Decentralization is beneficial (D)] | (D) Decentralization provides local govt development opportunities | Instrument Logic |
| 215 | 7/12/2021 1:00 | Government (Municipal) | Municipality of Nieuwkoop | New noise standards hinder housing construction | New noise standards hinder housing construction | Prioritization of objectives |
| 216 | 7/12/2021 1:00 | Government (Provincial) | Province of North Holland | New noise standards hinder housing construction | New noise standards hinder housing construction | Prioritization of objectives |
| 217 | 7/12/2021 1:00 | Government (Municipal) | Municipality of Alphen aan den Rijn | [EPA's Introduction should (Postpone)] | (Postpone) More time to work on DSO | Stances on Implementation |
| 218 | 7/12/2021 1:00 | Government (Municipal) | Municipality of Alphen aan den Rijn | [Process of Implementation threatens me] | System change delays progress | Threats from Implementation |
| 219 | 7/12/2021 1:00 | Government (Municipal) | Municipality of Alphen den Rijn | [Process of Implementation threatens me] | System change delays progress | Threats from Implementation |
| 220 | 7/12/2021 1:00 | Government (Municipal) | Municipality of Alphen aan den Rijn | [Introducing EPA leads to legal Issues] | System change causes lawsuits | Viability of Implementation |
| 221 | 11/12/2021 1:00 | Independent | Pim de Vroomen | New noise standards are good to curb noise pollution | New noise standards are good to curb noise pollution | Effectiveness of Policy (Noise) |
| 222 | 11/12/2021 1:00 | Government (Municipal) | Municipality of Katwijk | [Process of Implementation threatens me] | System change delays progress | Threats from Implementation |
| 223 | 11/12/2021 1:00 | Independent | Pim de Vroomen | [Introducing EPA leads to legal Issues] | EPA is legally problematic | Viability of Implementation |
| 224 | 18/12/2021 1:00 | Community & Civic Groups | Resident's Delegation in Schipol Environmental Council | New noise standards are good to curb noise pollution | New noise standards are good to curb noise pollution | Effectiveness of Policy (Noise) |
| 225 | 22/12/2021 1:00 | Government (Municipal) | Municipality of Katwijk | [Process of Implementation threatens me] | System change delays progress | Threats from Implementation |
| 226 | 8/1/2022 1:00 | Government (Provincial) | Hus and Hiem Design Committee | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 227 | 12/1/2022 1:00 | Government (Municipal) | Municipality of Katwijk | [EPA's Introduction should (Not Postpone)] | (Not Postpone) Preserve Momentum | Stances on Implementation |
| 228 | 28/1/2022 1:00 | ICT Companies | Tercera | [EPA's Introduction should (Postpone)] | (Postpone) More time to work on DSO | Stances on Implementation |
| 229 | 28/1/2022 1:00 | Government (Municipal) | Dutch Association for Council Members | [Resources are lacking for municipalities] | Municipalities cannot prioritize EPA | Viability of Implementation |
| 230 | 31/1/2022 1:00 | Independent | Pim de Vroomen | New noise standards are good to curb noise pollution | New noise standards are good to curb noise pollution | Effectiveness of Policy (Noise) |

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| 231 | 2/2/2022 1:00 | Government (National) | Ministry for Housing and Spatial Planning of the Netherlands | [EPA's Introduction should (Postpone)] | (Postpone) More time for municipalities to prepare | Stances on Implementation |
| 232 | 7/2/2022 1:00 | Academic & Research | Utrecht University | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 233 | 7/2/2022 1:00 | Academic & Research | Utrecht University | [EPA's Introduction should (Not Postpone)] | (Not Postpone) Preserve Momentum | Stances on Implementation |
| 234 | 7/2/2022 1:00 | Academic & Research | Utrecht University | [Process of Implementation threatens me] | Uncertainties from EPA causes risks to actors | Threats from Implementation |
| 235 | 7/2/2022 1:00 | Academic & Research | Utrecht University | [Introducing EPA leads to legal Issues] | EPA is legally problematic | Viability of Implementation |
| 236 | 8/2/2022 1:00 | Environmental Groups | Citizen's Initiative Warren Naturally Green | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 237 | 12/2/2022 1:00 | Independent | Maayke Houtman | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 238 | 12/2/2022 1:00 | ICT Companies | Cadac Group | [EPA does not simplify procedures (Not Simple)] | (Not Simple) DSO is too complexly designed | Effectiveness of Policy (Simplification) |
| 239 | 12/2/2022 1:00 | ICT Companies | Tercera | [EPA does not simplify procedures (Not Simple)] | (Not Simple) DSO is too complexly designed | Effectiveness of Policy (Simplification) |
| 240 | 12/2/2022 1:00 | Academic & Research | Wageningen University | [Centralization is needed instead (C)] | (C) Decentralization causes environmental standards to fall | Instrument Logic |
| 241 | 12/2/2022 1:00 | Developers & Construction | Herman Weelink | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 242 | 12/2/2022 1:00 | Independent | Claudia Carelse | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 243 | 12/2/2022 1:00 | Academic & Research | Erasmus University | [Decentralization is beneficial (D)] | (D) Decentralization allows municipalities to weigh interests better | Instrument Logic |
| 244 | 12/2/2022 1:00 | Independent | Claudia Carelse | [Decentralization is beneficial (D)] | (D) Decentralization provides local govt development opportunities | Instrument Logic |
| 245 | 12/2/2022 1:00 | ICT Companies | Cadac Group | DSO should be simpler | DSO should be simpler | Stances on Implementation |
| 246 | 12/2/2022 1:00 | Academic & Research | VU Amsterdam | [EPA should be cancelled (Cancel)] | (Cancel) DSO is flawed | Stances on Implementation |
| 247 | 12/2/2022 1:00 | Academic & Research | VU Amsterdam | [EPA should be cancelled (Cancel)] | (Cancel) DSO is flawed | Stances on Implementation |
| 248 | 12/2/2022 1:00 | Academic & Research | Erasmus University | [EPA should not be cancelled (Not Cancel)] | (Not Cancel) Should not cancel even with problems | Stances on Implementation |
| 249 | 12/2/2022 1:00 | Government (National) | Ministry for Housing and Spatial Planning of the Netherlands | [EPA's Introduction should (Not Postpone)] | (Not Postpone) Acceptable even if not smooth | Stances on Implementation |
| 250 | 12/2/2022 1:00 | Government (Municipal) | Municipality of Oude IJsselstreek | [EPA's Introduction should (Postpone)] | (Postpone) More time for municipalities to prepare | Stances on Implementation |
| 251 | 12/2/2022 1:00 | Intermediaries | Rho Adviseurs | [EPA's Introduction should (Postpone)] | (Postpone) More time for municipalities to prepare | Stances on Implementation |
| 252 | 12/2/2022 1:00 | ICT Companies | Cadac Group | [EPA's Introduction should (Postpone)] | (Postpone) More time to work on DSO | Stances on Implementation |
| 253 | 12/2/2022 1:00 | Intermediaries | Rho Adviseurs | [Process of Implementation threatens me] | System change delays progress | Threats from Implementation |
| 254 | 12/2/2022 1:00 | Developers & Construction | Herman Weelink | [Introducing EPA leads to legal Issues] | Legal issues causes EPA to be ineffective | Viability of Implementation |
| 255 | 12/2/2022 1:00 | Government (Municipal) | Municipality of Oude IJsselstreek | [Resources are lacking for municipalities] | Municipalites cannot prioritize EPA | Viability of Implementation |

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| 256 | 12/2/2022 1:00 | Intermediaries | Rho Adviseurs | [Resources are lacking for municipalities] | Municipalities cannot prioritize EPA | Viability of Implementation |
| 257 | 12/2/2022 1:00 | ICT Companies | Tercera | DSO is formulated too broad, makes it difficult to coordinate data | DSO is formulated too broad, makes it difficult to coordinate data | Viability of Implementation |
| 258 | 15/2/2022 1:00 | Environmental Groups | Brabant Environmental Federation | [Centralization is needed instead (C)] | (C) "Yes, provided" makes it hard for protection | Instrument Logic |
| 259 | 15/2/2022 1:00 | Government (Provincial) | Province of North Holland | New noise standards hinder housing construction | New noise standards hinder housing construction | Prioritization of objectives |
| 260 | 21/2/2022 1:00 | Community & Civic Groups | Resident's Delegation in Schipol Environmental Council | New noise standards are good to curb noise pollution | New noise standards are good to curb noise pollution | Effectiveness of Policy (Noise) |
| 261 | 21/2/2022 1:00 | Community & Civic Groups | Resident's Delegation in Schipol Environmental Council | EPA must strike a balance between using and protecting space | EPA must strike a balance between using and protecting space | Prioritization of objectives |
| 262 | 8/3/2022 1:00 | Environmental Groups | All of North, One Garden | [EPA is effective for CP (CP)] | (CP) Considers citizen interest better | Effectiveness of Policy (Citizen Participation) |
| 263 | 9/3/2022 1:00 | Academic & Research | Utrecht University | Terms of municipal councilors should be extended | Terms of municipal councilors should be extended | Stances on Implementation |
| 264 | 12/3/2022 1:00 | Government (National) | Ministry for Housing and Spatial Planning of the Netherlands | [Introducing EPA leads to legal Issues] | EPA has legal foundation for housing construction | Viability of Implementation |
| 265 | 22/3/2022 1:00 | Developers & Construction | Dura Vermeer | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 266 | 22/3/2022 1:00 | Developers & Construction | Dura Vermeer | Citizen participation makes progress slower | Citizen participation makes progress slower | Prioritization of objectives |
| 267 | 6/4/2022 2:00 | Government (Municipal) | Council for Spatial Planning Oegstgeest | New noise standards hinder housing construction | New noise standards hinder housing construction | Prioritization of objectives |
| 268 | 7/4/2022 2:00 | Government (Municipal) | Municipality of Teylingen | EPA has potential but implementation is difficult | EPA has potential but implementation is difficult | General Implementation Beliefs |
| 269 | 7/4/2022 2:00 | Government (Provincial) | Province of Fryslan | [Decentralization is beneficial (D)] | (D) Decentralization provides local govt development opportunities | Instrument Logic |
| 270 | 20/4/2022 2:00 | Government (National) | Council of State | [Resources are lacking for municipalities] | Municipalities are understaffed for implementation | Viability of Implementation |
| 271 | 23/4/2022 2:00 | Community & Civic Groups | Rotterdam Naturally! | [Centralization is needed instead (C)] | (C) Decentralization causes environmental standards to fall | Instrument Logic |
| 272 | 4/5/2022 2:00 | Government (Municipal) | Municipality of Teylingen | [Process of Implementation threatens me] | System change delays progress | Threats from Implementation |
| 273 | 11/6/2022 2:00 | Government (National) | National Obudsman | [EPA does not simplify procedures (Not Simple)] | (Not Simple) New rules are complicated for initiators | Effectiveness of Policy (Simplification) |
| 274 | 11/6/2022 2:00 | Independent | Domestic Governance | Overfocus on implementation than policy adjustment | Overfocus on implementation than policy adjustment | General Implementation Beliefs |
| 275 | 11/6/2022 2:00 | Government (National) | Council of State | [EPA's Introduction should (Postpone)] | (Postpone) Introduction now is risky | Stances on Implementation |
| 276 | 16/6/2022 2:00 | Government (National) | Council for the Living Environment and Infrastructure | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 277 | 22/6/2022 2:00 | Government (Provincial) | Province of Fryslan | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |

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| 278 | 29/6/2022 2:00 | Government (National) | Ministry for Housing and Spatial Planning of the Netherlands | Simplification helps with housing construction | Simplification helps with housing construction | Prioritization of objectives |
| 279 | 29/6/2022 2:00 | Government (National) | Prime Minister | Simplification helps with housing construction | Simplification helps with housing construction | Prioritization of objectives |
| 280 | 6/7/2022 2:00 | Government (Municipal) | Municipality of Leiden | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 281 | 29/7/2022 2:00 | Academic & Research | University of Amsterdam | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 282 | 29/7/2022 2:00 | Academic & Research | University of Amsterdam | More direction and support from national government | More direction and support from national government | Stances on Implementation |
| 283 | 29/7/2022 2:00 | Academic & Research | University of Amsterdam | [Introducing EPA leads to legal Issues] | EPA is legally problematic | Viability of Implementation |
| 284 | 30/7/2022 2:00 | Environmental Groups | Mobilization for the Environment | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 285 | 9/8/2022 2:00 | ICT Companies | Software Builder for DSO | Communication of progress was not transparent | Communication of progress was not transparent | General Implementation Beliefs |
| 286 | 9/8/2022 2:00 | Government (National) | Ministry for Housing and Spatial Planning of the Netherlands | [EPA's Introduction should (Not Postpone)] | (Not Postpone) DSO is ready | Stances on Implementation |
| 287 | 9/8/2022 2:00 | Government (National) | Member of Senate | [EPA's Introduction should (Postpone)] | (Postpone) More time to work on DSO | Stances on Implementation |
| 288 | 10/8/2022 2:00 | ICT Companies | Software Builder for DSO | Communication of progress was not transparent | Communication of progress was not transparent | General Implementation Beliefs |
| 289 | 8/9/2022 2:00 | Developers & Construction | Tjalling Dijkstra (Initiator) | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 290 | 8/9/2022 2:00 | Environmental Groups | Leidse Parks Platform | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 291 | 28/9/2022 2:00 | Academic & Research | I&O Research | [EPA's Introduction should (Postpone)] | (Postpone) More time for municipalities to prepare | Stances on Implementation |
| 292 | 30/9/2022 2:00 | Government (Municipal) | Municipality of Oegstgeest | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 293 | 30/9/2022 2:00 | Community & Civic Groups | Residents of Oegstgeest | EV can be more ambitious | EV can be more ambitious | Stances on Implementation |
| 294 | 11/10/2022 2:00 | Government (Municipal) | GGD | [EPA not effective for CP (Not CP)] | (Not CP) Implementation was lacking | Effectiveness of Policy (Citizen Participation) |
| 295 | 11/10/2022 2:00 | Government (Municipal) | GGD | [EPA not effective for CP (Not CP)] | (Not CP) Municipalities have too much control | Effectiveness of Policy (Citizen Participation) |
| 296 | 12/10/2022 2:00 | Independent | Dick Speijers | [EPA not effective for CP (Not CP)] | (Not CP) Municipalities have too much control | Effectiveness of Policy (Citizen Participation) |
| 297 | 12/10/2022 2:00 | Government (National) | ICT Assessment Advisory Board | [EPA's Introduction should (Postpone)] | (Postpone) Introduction now is risky | Stances on Implementation |
| 298 | 12/10/2022 2:00 | Government (National) | ICT Assessment Advisory Board | [EPA's Introduction should (Postpone)] | (Postpone) More time to work on DSO | Stances on Implementation |
| 299 | 12/10/2022 2:00 | Government (National) | ICT Assessment Advisory Board | [EPA's Introduction should (Postpone)] | (Postpone) More time to work on DSO | Stances on Implementation |
| 300 | 12/10/2022 2:00 | Developers & Construction | Neprom | [Process of Implementation threatens me] | System change delays progress | Threats from Implementation |
| 301 | 12/10/2022 2:00 | Government (National) | ICT Assessment Advisory Board | [Introducing EPA leads to legal Issues] | Alternative working methods is not legally valid | Viability of Implementation |
| 302 | 15/10/2022 2:00 | Government (National) | Ministry for Housing and Spatial Planning of the Netherlands | [EPA's Introduction should (Not Postpone)] | (Not Postpone) Disadvantage authorities sufficiently prepared | Stances on Implementation |

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| 303 | 15/10/2022 2:00 | Government (National) | Ministry for Housing and Spatial Planning of the Netherlands | [EPA's Introduction should (Not Postpone)] | (Not Postpone) EPA is urgently needed | Stances on Implementation |
| 304 | 15/10/2022 2:00 | Government (National) | Ministry for Housing and Spatial Planning of the Netherlands | [EPA's Introduction should (Not Postpone)] | (Not Postpone) Prevent Additional costs | Stances on Implementation |
| 305 | 15/10/2022 2:00 | Government (National) | ICT Assessment Advisory Board | [EPA's Introduction should (Postpone)] | (Postpone) Introduction now is risky | Stances on Implementation |
| 306 | 1/11/2022 1:00 | Government (Municipal) | Municipality of Leiden | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 307 | 1/11/2022 1:00 | Academic & Research | Maastricht University | [Resources are lacking for municipalities] | Municipalities take on too many new tasks | Viability of Implementation |
| 308 | 5/11/2022 1:00 | Developers & Construction | Independent Developer | [Resources are lacking for municipalities] | Municipalities are understaffed for implementation | Viability of Implementation |
| 309 | 12/11/2022 1:00 | Government (Municipal) | Municipality of Leiden | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 310 | 1/12/2022 1:00 | Government (Provincial) | Human Environment and Transport Inspectorate | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 311 | 1/12/2022 1:00 | Government (Provincial) | Human Environment and Transport Inspectorate | Simplification is not better for planning | Simplification is not better for planning | Prioritization of objectives |
| 312 | 9/12/2022 1:00 | Government (National) | Netherlands Environmental Assessment Agency | [Process of Implementation threatens me] | System change delays progress | Threats from Implementation |
| 313 | 21/12/2022 1:00 | Government (Provincial) | Special Coordinator North Brabant & Limburg | [EPA is effective for CP (CP)] | (CP) Considers citizen interest better | Effectiveness of Policy (Citizen Participation) |
| 314 | 17/2/2023 1:00 | Government (National) | Ministry for Housing and Spatial Planning of the Netherlands | [Decentralization is beneficial (D)] | (D) Decentralization should not be blamed for non-spatial issues | Instrument Logic |
| 315 | 8/3/2023 1:00 | Environmental Groups | Natuurmonumenten | [EPA does not simplify procedures (Not Simple)] | (Not Simple) New rules are complicated for citizens | Effectiveness of Policy (Simplification) |
| 316 | 8/3/2023 1:00 | Government (Provincial) | Fries Social Planning Office | Implementing decentralization is difficult | Implementing decentralization is difficult | General Implementation Beliefs |
| 317 | 8/3/2023 1:00 | Government (National) | Council of State | DSO needs to be completed earlier | DSO needs to be completed earlier | Stances on Implementation |
| 318 | 8/3/2023 1:00 | Environmental Groups | Natuurmonumenten | [Introducing EPA leads to legal Issues] | Errors from DSO causes legal issues | Viability of Implementation |
| 319 | 15/3/2023 1:00 | Government (National) | Council of State | [EPA's Introduction should (Postpone)] | (Postpone) More time to work on DSO | Stances on Implementation |
| 320 | 15/3/2023 1:00 | Government (National) | Council of State | [Introducing EPA leads to legal Issues] | DSO will cause legal issues | Viability of Implementation |
| 321 | 15/3/2023 1:00 | Government (National) | ICT Assessment Advisory Board | Permits depend on DSO | Permits depend on DSO | Viability of Implementation |
| 322 | 28/3/2023 2:00 | Government (Municipal) | Municipality of Ooegstgeest | [EPA is effective at sectoral integration] | (Int) Instruments forces long-term planning | Effectiveness of Policy (Integration) |
| 323 | 9/5/2023 2:00 | Government (National) | Advisory Committee on Land and Environmental Law | [New changes affect my interest negatively] | New municipal rules affects my interest negatively | Threats from Implementation |
| 324 | 9/5/2023 2:00 | Intermediaries | Kneppelhout Law Firm | [New changes affect my interest negatively] | New municipal rules affects my interest negatively | Threats from Implementation |
| 325 | 9/5/2023 2:00 | Academic & Research | Radboud University Nijmegen | [Introducing EPA leads to legal Issues] | EPA is legally problematic | Viability of Implementation |
| 326 | 12/5/2023 2:00 | Government (National) | Council for Environment and Infrastructure | [Centralization is needed instead (C)] | (C) Decentralization causes environmental standards to fall | Instrument Logic |
| 327 | 12/5/2023 2:00 | Government (National) | Council for the Environment and Infrastructure | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |

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| 328 | 13/5/2023 2:00 | Academic & Research | Wageningen University | [Process of Implementation threatens me] | System change delays progress | Threats from Implementation |
| 329 | 27/5/2023 2:00 | Academic & Research | University of Groningen | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 330 | 3/7/2023 2:00 | Industries & Businesses | VVEM | [EPA does not simplify procedures (Not Simple)] | (Not Simple) New rules are complicated for initiators | Effectiveness of Policy (Simplification) |
| 331 | 3/7/2023 2:00 | Industries & Businesses | VVEM | [Process of Implementation threatens me] | Uncertainties from EPA causes risks to actors | Threats from Implementation |
| 332 | 3/7/2023 2:00 | Industries & Businesses | VVEM | [Process of Implementation threatens me] | Uncertainties from EPA causes risks to actors | Threats from Implementation |
| 333 | 19/7/2023 2:00 | Government (National) | Member of Senate | [EPA's Introduction should (Postpone)] | (Postpone) More time for legal adjustments | Stances on Implementation |
| 334 | 19/7/2023 2:00 | Government (National) | Member of Senate | [Process of Implementation threatens me] | Uncertainties from EPA causes risks to actors | Threats from Implementation |
| 335 | 19/7/2023 2:00 | Government (National) | Member of Senate | [Process of Implementation threatens me] | Uncertainties from EPA causes risks to actors | Threats from Implementation |
| 336 | 19/7/2023 2:00 | Government (National) | Ministry for Housing and Spatial Planning of the Netherlands | EPA cannot be adjusted due to momentum | EPA cannot be adjusted due to momentum | Viability of Implementation |
| 337 | 12/8/2023 2:00 | Government (Municipal) | Municipality of Alphen aan den Rijn | [Resources are lacking for municipalities] | Municipalities are understaffed for implementation | Viability of Implementation |
| 338 | 5/9/2023 2:00 | Community & Civic Groups | Droom en Daad Foundation | [Introducing EPA leads to legal Issues] | EPA is legally problematic | Viability of Implementation |
| 339 | 12/9/2023 2:00 | Developers & Construction | Bouwend Nederland Trade Association | Effect of WkB postponed | Effect of WkB postponed | Stances on Implementation |
| 340 | 12/9/2023 2:00 | Government (National) | Ministry for Housing and Spatial Planning of the Netherlands | WkB and EPA has to be introduced together | WkB and EPA has to be introduced together | Stances on Implementation |
| 341 | 12/9/2023 2:00 | Government (National) | Ministry for Housing and Spatial Planning of the Netherlands | [EPA's Introduction should (Postpone)] | (Postpone) More time for legal adjustments | Stances on Implementation |
| 342 | 12/9/2023 2:00 | Developers & Construction | Bouwend Nederland Trade Association | [Resources are lacking for municipalities] | Municipalities are understaffed for implementation | Viability of Implementation |
| 343 | 10/10/2023 2:00 | ICT Companies | Blendle Platform | Government should prioritize DSO | Government should prioritize DSO | Stances on Implementation |
| 344 | 10/10/2023 2:00 | ICT Companies | Blendle Platform | DSO is not managed properly | DSO is not managed properly | Viability of Implementation |
| 345 | 16/10/2023 2:00 | Government (Municipal) | Municipality of Noordwijk | [Resources are lacking for municipalities] | Municipalities have funding gaps for implementation | Viability of Implementation |
| 346 | 24/10/2023 2:00 | Developers & Construction | Netherlands Building and Housing Supervision Association | [EPA does not simplify procedures (Not Simple)] | (Not Simple) Uncertainties in EPA complicates initiation | Effectiveness of Policy (Simplification) |
| 347 | 24/10/2023 2:00 | Government (National) | Ministry for Housing and Spatial Planning of the Netherlands | Implementation problems are inevitable | Implementation problems are inevitable | General Implementation Beliefs |
| 348 | 27/10/2023 2:00 | Developers & Construction | WoningbouwersNL | New noise standards hinder housing construction | New noise standards hinder housing construction | Prioritization of objectives |
| 349 | 1/11/2023 1:00 | Government (National) | Member of Senate | [EPA's Introduction should (Postpone)] | (Postpone) Introduction now is risky | Stances on Implementation |
| 350 | 1/11/2023 1:00 | Government (National) | Member of Senate | [EPA's Introduction should (Postpone)] | (Postpone) Introduction now is risky | Stances on Implementation |
| 351 | 2/11/2023 1:00 | Government (Municipal) | Municipality of Leiden | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 352 | 2/11/2023 1:00 | Government (Municipal) | Municipality of Leiden | EPA should focus on the vulnerable | EPA should focus on the vulnerable | Stances on Implementation |

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| 353 | 30/11/2023 1:00 | Government (National) | Scientific Council for Government Policy | [EPA not effective for CP (Not CP)] | (Not CP) Municipalities have too much control | Effectiveness of Policy (Citizen Participation) |
| 354 | 1/12/2023 1:00 | Government (Provincial) | Province of South Holland | New noise standards are good to curb noise pollution | New noise standards are good to curb noise pollution | Effectiveness of Policy (Noise) |
| 355 | 27/12/2023 1:00 | Government (National) | Council of State | [EPA does not simplify procedures (Not Simple)] | (Not Simple) New rules are complicated for everyone | Effectiveness of Policy (Simplification) |
| 356 | 28/12/2023 1:00 | Government (Provincial) | Province of Fryslan | [EPA is effective at sectoral integration] | (Int) Instruments stimulates better internal coordination | Effectiveness of Policy (Integration) |
| 357 | 28/12/2023 1:00 | Government (Provincial) | Province of Fryslan | [EPA does not simplify procedures (Not Simple)] | (Not Simple) DSO is too complexly designed | Effectiveness of Policy (Simplification) |
| 358 | 28/12/2023 1:00 | Government (Provincial) | Province of Fryslan | [EPA does not simplify procedures (Not Simple)] | (Not Simple) Uncertainties in EPA complicates initiation | Effectiveness of Policy (Simplification) |
| 359 | 28/12/2023 1:00 | Government (Provincial) | Province of South Holland | EPA has potential but implementation is difficult | EPA has potential but implementation is difficult | General Implementation Beliefs |
| 360 | 28/12/2023 1:00 | Government (Provincial) | Province of Fryslan | Implementing decentralization is difficult | Implementing decentralization is difficult | General Implementation Beliefs |
| 361 | 28/12/2023 1:00 | Government (Municipal) | Municipality of De Fryske Marren | Implementing EPA is good after postponements | Implementing EPA is good after postponements | General Implementation Beliefs |
| 362 | 28/12/2023 1:00 | Government (Provincial) | Province of Fryslan | [Introducing EPA leads to legal Issues] | System change causes lawsuits | Viability of Implementation |
| 363 | 29/12/2023 1:00 | Intermediaries | TriaCon | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 364 | 29/12/2023 1:00 | Community & Civic Groups | Association for Church Rental Management in the Protestant Church in the Netherlands | [EPA simplifies procedures (Simple)] | (Simple) Rule bundling makes initiation process simpler | Effectiveness of Policy (Simplification) |
| 365 | 29/12/2023 1:00 | Community & Civic Groups | Protestant Community of Franeker | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 366 | 29/12/2023 1:00 | Government (Provincial) | North Holland Monuments & Archeology Support Center | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 367 | 29/12/2023 1:00 | Intermediaries | TriaCon | Citizen participation makes progress slower | Citizen participation makes progress slower | Prioritization of objectives |
| 368 | 29/12/2023 1:00 | Community & Civic Groups | Association for Church Rental Management in the Protestant Church in the Netherlands | Municipalities can do more for citizen participation | Municipalities can do more for citizen participation | Stances on Implementation |
| 369 | 29/12/2023 1:00 | Government (Municipal) | Association of Dutch Municipalities | [EPA's Introduction should (Postpone)] | (Postpone) More time for municipalities to prepare | Stances on Implementation |
| 370 | 29/12/2023 1:00 | Government (Municipal) | Interior and the Association of Dutch Municipalities | [EPA's Introduction should (Postpone)] | (Postpone) More time for municipalities to prepare | Stances on Implementation |
| 371 | 30/12/2023 1:00 | Developers & Construction | Peter de Ruyter (Landscape Architect) | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 372 | 30/12/2023 1:00 | Developers & Construction | Peter de Ruyter (Landscape Architect) | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 373 | 30/12/2023 1:00 | Developers & Construction | Peter de Ruyter (Landscape Architect) | [EPA is effective at sectoral integration] | (Int) Instruments provides an integrated planning framework | Effectiveness of Policy (Integration) |
| 374 | 30/12/2023 1:00 | Developers & Construction | Peter de Ruyter (Landscape Architect) | [EPA simplifies procedures (Simple)] | (Simple) Rule bundling makes rules clearer | Effectiveness of Policy (Simplification) |

| | | | | | | |
|-----|--------------------|---------------------------------------|--------------------------------------------------------------|---------------------------------------------------|--------------------------------------------------------------------|-------------------------------------------------|
| 375 | 30/12/2023 1:00 | Developers & Construction | Peter de Ruyter (Landscape Architect) | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 376 | 30/12/2023 1:00 | Developers & Construction | Peter de Ruyter (Landscape Architect) | Citizen participation leads to conflicts | Citizen participation leads to conflicts | Prioritization of objectives |
| 377 | 2/1/2024 1:00 | Government (National) | Scientific Council for Government Policy | [EPA not effective for CP (Not CP)] | (Not CP) EPA favours minority | Effectiveness of Policy (Citizen Participation) |
| 378 | 2/1/2024 1:00 | Government (National) | Ministry of Infrastructure and Water Management | [Centralization is needed instead (C)] | (C) Decentralization causes environmental standards to fall | Instrument Logic |
| 379 | 2/1/2024 1:00 | Government (National) | Member of Senate | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 380 | 2/1/2024 1:00 | Independent | Domestic Governance | [Decentralization is beneficial (D)] | (D) Decentralization provides local govt development opportunities | Instrument Logic |
| 381 | 2/1/2024 1:00 | Government (Municipal) | Municipality of Leeuwarden | [EPA's Introduction should (Not Postpone)] | (Not Postpone) Acceptable even if not smooth | Stances on Implementation |
| 382 | 2/1/2024 1:00 | Government (National) | Ministry for Housing and Spatial Planning of the Netherlands | [EPA's Introduction should (Not Postpone)] | (Not Postpone) Postponement does not improve situation | Stances on Implementation |
| 383 | 2/1/2024 1:00 | Intermediaries | Stout Groep | [EPA's Introduction should (Not Postpone)] | (Not Postpone) Preserve Momentum | Stances on Implementation |
| 384 | 2/1/2024 1:00 | Government (National) | Ministry of Infrastructure and Water Management | [EPA's Introduction should (Postpone)] | (Postpone) More time for municipalities to prepare | Stances on Implementation |
| 385 | 2/1/2024 1:00 | Government (National) | Council of State | [Introducing EPA leads to legal Issues] | EPA is legally problematic | Viability of Implementation |
| 386 | 2/1/2024 1:00 | Government (National) | Member of Senate | [Introducing EPA leads to legal Issues] | EPA is legally problematic | Viability of Implementation |
| 387 | 2/1/2024 1:00 | Government (Municipal) | Municipality of Leeuwarden | Permits are not functioning as intended | Permits are not functioning as intended | Viability of Implementation |
| 388 | 3/1/2024 1:00 | Government (National) | Member of Senate | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 389 | 3/1/2024 1:00 | Government (Municipal) | Municipality of Leeuwarden | [EPA's Introduction should (Not Postpone)] | (Not Postpone) Municipality is ready | Stances on Implementation |
| 390 | 3/1/2024 1:00 | Government (National) | Ministry for Housing and Spatial Planning of the Netherlands | [EPA's Introduction should (Not Postpone)] | (Not Postpone) Postponement does not improve situation | Stances on Implementation |
| 391 | 3/1/2024 1:00 | Intermediaries | Stout Groep | [EPA's Introduction should (Not Postpone)] | (Not Postpone) Preserve Momentum | Stances on Implementation |
| 392 | 3/1/2024 1:00 | Government (National) | Member of Senate | [Introducing EPA leads to legal Issues] | DSO will cause legal issues | Viability of Implementation |
| 393 | 5/1/2024 1:00 | Government (National) | Ministry of Infrastructure and Water Management | [EPA's Introduction should (Postpone)] | (Postpone) More time for legal adjustments | Stances on Implementation |
| 394 | 6/1/2024 1:00 | Government (National) | Dutch Food and Consumer Product Safety Authority | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 395 | 9/1/2024 1:00 | Environmental Groups | North Brabant Bat Reporting Network | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 396 | 18/1/2024 1:00 | Government (Municipal) | Municipality of Asten | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 397 | 14/2/2024 1:00 | Architectural & Planning Associations | De Roos Advocaten | [Introducing EPA leads to legal Issues] | Legal issues causes EPA to be ineffective | Viability of Implementation |
| 398 | 19/2/2024 1:00 | Developers & Construction | AG Nova Architects | [EPA simplifies procedures (Simple)] | (Simple) Rule bundling makes initiation process simpler | Effectiveness of Policy (Simplification) |

| | | | | | | |
|-----|-------------------|---------------------------|----------------------------------------------------------|--------------------------------------------------------------|----------------------------------------------------------------------|-------------------------------------------------|
| 399 | 19/2/2024 1:00 | Developers & Construction | AG Nova Architects | Simplification helps with housing construction | Simplification helps with housing construction | Prioritization of objectives |
| 400 | 29/2/2024 1:00 | Academic & Research | Dutch Research Council | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 401 | 12/3/2024 1:00 | Academic & Research | Wageningen University | [EPA is effective at sectoral integration] | (Int) Instruments allows for integrated goals | Effectiveness of Policy (Integration) |
| 402 | 14/3/2024 1:00 | Government (Municipal) | Municipality of Rheden | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 403 | 28/3/2024 1:00 | Government (National) | Council for Public Administration | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 404 | 28/3/2024 1:00 | Government (National) | Council for Public Administration | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 405 | 28/3/2024 1:00 | Government (National) | Council for Public Administration | [Centralization is needed instead (C)] | (C) Decentralization loses coherence for national issues | Instrument Logic |
| 406 | 28/3/2024 1:00 | Government (National) | Council for Public Administration | [Decentralization is beneficial (D)] | (D) Decentralization allows municipalities to weigh interests better | Instrument Logic |
| 407 | 28/3/2024 1:00 | Government (National) | Council for Public Administration | More direction and support from national government | More direction and support from national government | Stances on Implementation |
| 408 | 2/4/2024 2:00 | Government (National) | Netherlands Interdisciplinary Demographic Institute | [Decentralization is beneficial (D)] | (D) Decentralization allows local govt to set rules for protection | Instrument Logic |
| 409 | 18/4/2024 2:00 | ICT Companies | Blendle Platform | DSO is too expensive | DSO is too expensive | Viability of Implementation |
| 410 | 22/4/2024 2:00 | Developers & Construction | SeARCH Architects | Citizen participation makes progress slower | Citizen participation makes progress slower | Prioritization of objectives |
| 411 | 23/4/2024 2:00 | Community & Civic Groups | Residents of Groningen | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 412 | 23/4/2024 2:00 | Government (Municipal) | Municipality of Groningen | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 413 | 23/4/2024 2:00 | Developers & Construction | Netherlands Building and Housing Supervision Association | [EPA is effective for CP (CP)] | (CP) Process involves citizens more | Effectiveness of Policy (Citizen Participation) |
| 414 | 23/4/2024 2:00 | Community & Civic Groups | Residents' organization Oosterparkwijk | [EPA not effective for CP (Not CP)] | (Not CP) Implementation was lacking | Effectiveness of Policy (Citizen Participation) |
| 415 | 23/4/2024 2:00 | Community & Civic Groups | Neighbourhood Association of Groningen | [EPA not effective for CP (Not CP)] | (Not CP) Municipalities have too much control | Effectiveness of Policy (Citizen Participation) |
| 416 | 23/4/2024 2:00 | Developers & Construction | Netherlands Building and Housing Supervision Association | [EPA does not simplify procedures (Not Simple)] | (Not Simple) New rules are complicated for everyone | Effectiveness of Policy (Simplification) |
| 417 | 23/4/2024 2:00 | Community & Civic Groups | Neighbourhood Association of Groningen | [Decentralization is beneficial (D)] | (D) Decentralization provides local govt development opportunities | Instrument Logic |
| 418 | 23/4/2024 2:00 | Government (Municipal) | Municipality of Groningen | EPA must strike a balance between using and protecting space | EPA must strike a balance between using and protecting space | Prioritization of objectives |
| 419 | 23/4/2024 2:00 | Government (Municipal) | Municipality of Groningen | [Resources are lacking for municipalities] | Municipalites cannot prioritize EPA | Viability of Implementation |
| 420 | 23/4/2024 2:00 | Developers & Construction | Netherlands Building and Housing Supervision Association | [Resources are lacking for municipalities] | Municipalities consume a lot of resources to implement EPA | Viability of Implementation |

| | | | | | | |
|-----|-------------------|------------------------|---------------------------|---------------------------------------------|--------------------------------------------------------------------|-------------------------------------------------|
| 421 | 26/4/2024 2:00 | Independent | Mercel Gerritsen | [EPA not effective for CP (Not CP)] | (Not CP) Municipalities have too much control | Effectiveness of Policy (Citizen Participation) |
| 422 | 26/4/2024 2:00 | Government (Municipal) | Municipality of Wassenaar | [Decentralization is beneficial (D)] | (D) Decentralization provides local govt development opportunities | Instrument Logic |

Appendix G

(Top Storylines per Actor Type)

Table G-1: Table of top 3 most occurring storylines per actor type, including statement counts, fraction of statements that year.

| actor_type | Storylines | count | fraction |
|---------------------------------------|------------------------------------------------------|-------|----------|
| Academic & Research | [Decentralization is beneficial (D)] | 8 | 0.20 |
| | [Centralization is needed instead (C)] | 7 | 0.17 |
| | [Introducing EPA leads to legal Issues] | 4 | 0.10 |
| Architectural & Planning Associations | [Decentralization is beneficial (D)] | 1 | 0.50 |
| | [Introducing EPA leads to legal Issues] | 1 | 0.50 |
| Community & Civic Groups | [Decentralization is beneficial (D)] | 3 | 0.17 |
| | [EPA not effective for CP (Not CP)] | 3 | 0.17 |
| | New noise standards are good to curb noise pollution | 2 | 0.11 |
| | [Centralization is needed instead (C)] | 2 | 0.11 |
| | [EPA is effective for CP (CP)] | 2 | 0.11 |
| Developers & Construction | [EPA is effective for CP (CP)] | 8 | 0.24 |
| | [Centralization is needed instead (C)] | 4 | 0.12 |
| | [EPA does not simplify procedures (Not Simple)] | 3 | 0.09 |
| | [Resources are lacking for municipalities] | 3 | 0.09 |
| Environmental Groups | [Centralization is needed instead (C)] | 3 | 0.25 |
| | [Decentralization is beneficial (D)] | 3 | 0.25 |
| | [EPA is effective for CP (CP)] | 2 | 0.17 |
| Government (Municipal) | [Resources are lacking for municipalities] | 17 | 0.15 |
| | [Decentralization is beneficial (D)] | 14 | 0.13 |
| | [EPA is effective for CP (CP)] | 14 | 0.13 |
| Government (National) | [EPA's Introduction should (Postpone)] | 18 | 0.16 |
| | [Decentralization is beneficial (D)] | 17 | 0.15 |
| | [EPA not effective for CP (Not CP)] | 11 | 0.09 |
| Government (Provincial) | [Decentralization is beneficial (D)] | 4 | 0.15 |
| | [Centralization is needed instead (C)] | 3 | 0.11 |
| | Implementing decentralization is difficult | 2 | 0.07 |
| | New noise standards hinder housing construction | 2 | 0.07 |
| | [EPA does not simplify procedures (Not Simple)] | 2 | 0.07 |
| | [EPA is effective at sectoral integration (Int)] | 2 | 0.07 |
| | [EPA's Introduction should (Not Postpone)] | 2 | 0.07 |
| | [Decentralization is beneficial (D)] | 2 | 1.00 |
| Government (Waterboard) | [EPA's Introduction should (Postpone)] | 4 | 0.27 |
| | Communication of progress was not transparent | 3 | 0.20 |
| | [EPA does not simplify procedures (Not Simple)] | 2 | 0.13 |
| ICT Companies | | | |

| | | | |
|-------------------------|------------------------------------------------------|---|------|
| Independent | [EPA not effective for CP (Not CP)] | 4 | 0.24 |
| | [Decentralization is beneficial (D)] | 3 | 0.18 |
| | New noise standards are good to curb noise pollution | 2 | 0.12 |
| | [EPA is effective for CP (CP)] | 2 | 0.12 |
| Industries & Businesses | [New changes affect my interest negatively] | 5 | 0.50 |
| | [Process of Implementation threatens me] | 2 | 0.20 |
| | Municipalities can do more for citizen participation | 1 | 0.10 |
| | [EPA does not simplify procedures (Not Simple)] | 1 | 0.10 |
| | [EPA not effective for CP (Not CP)] | 1 | 0.10 |
| Intermediaries | [Resources are lacking for municipalities] | 4 | 0.25 |
| | Citizen participation makes progress slower | 3 | 0.19 |
| | [EPA's Introduction should (Not Postpone)] | 2 | 0.13 |

Appendix H

(Compiled Diagram of Storyline Congruence)

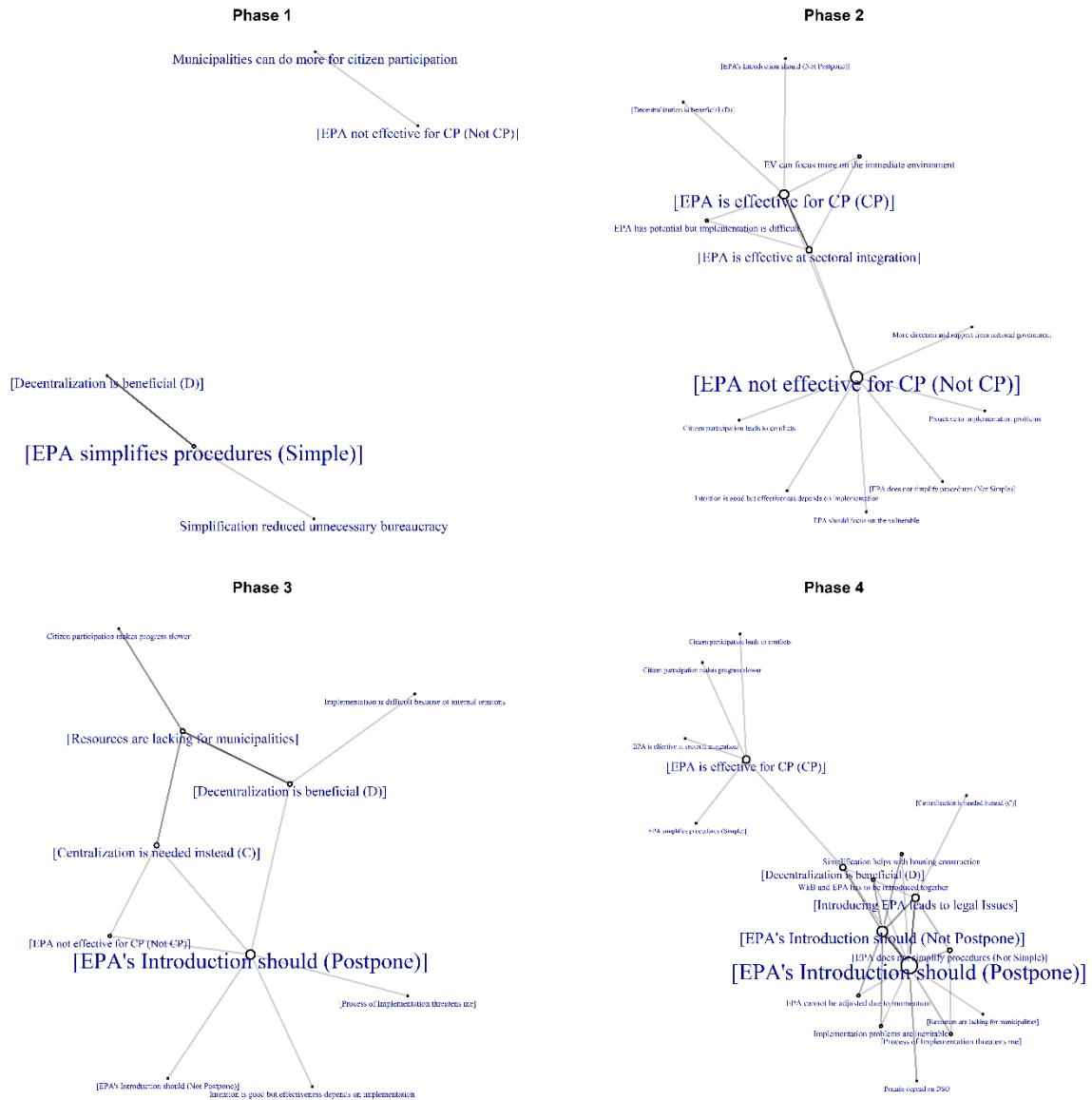


Figure H-1: Compiled Diagram of Storyline Congruence Network across Phase 1 to Phase 4.

Appendix I

(Actor Congruence Networks)

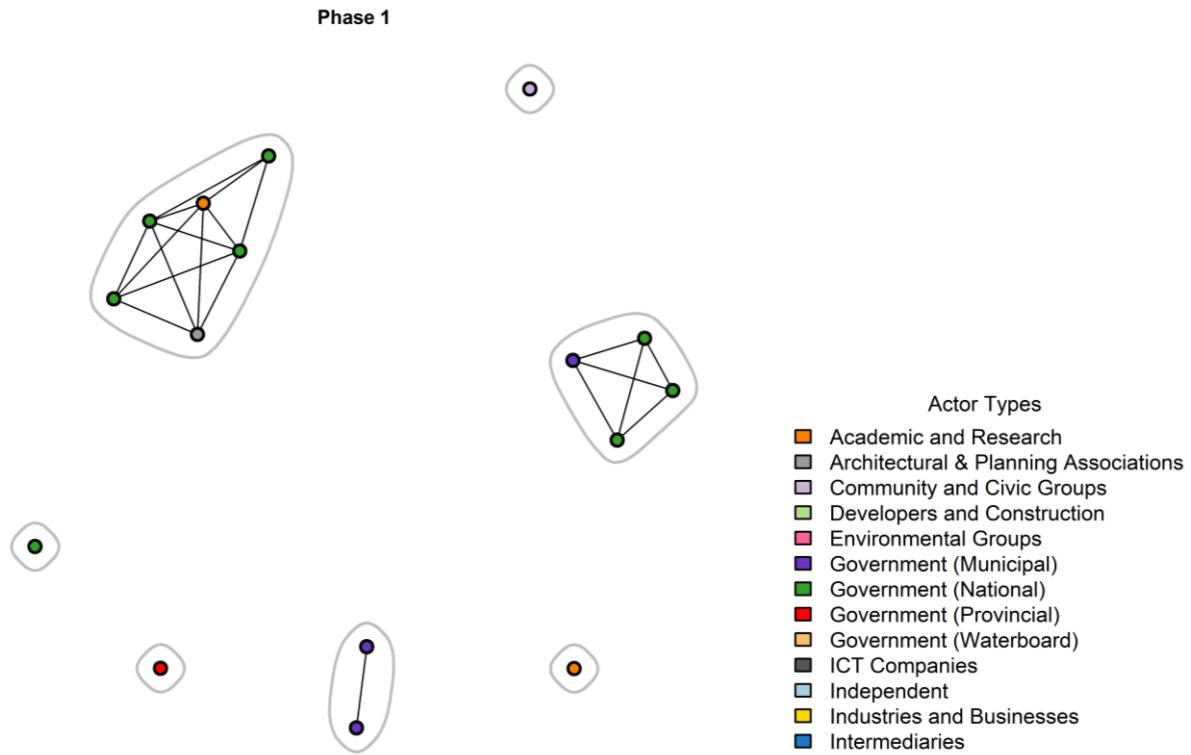


Figure I-1: Close up of the Actor Congruence Network in Phase 1

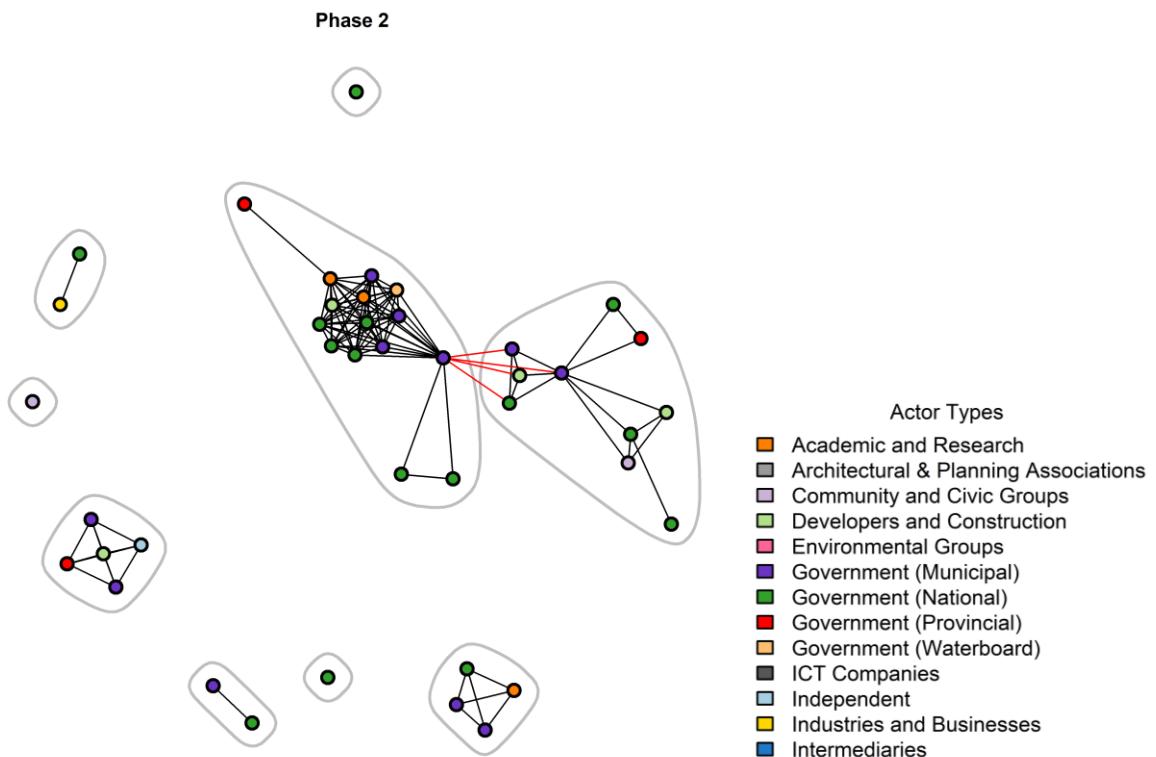


Figure I-2: Close up of the Actor Congruence Network in Phase 2

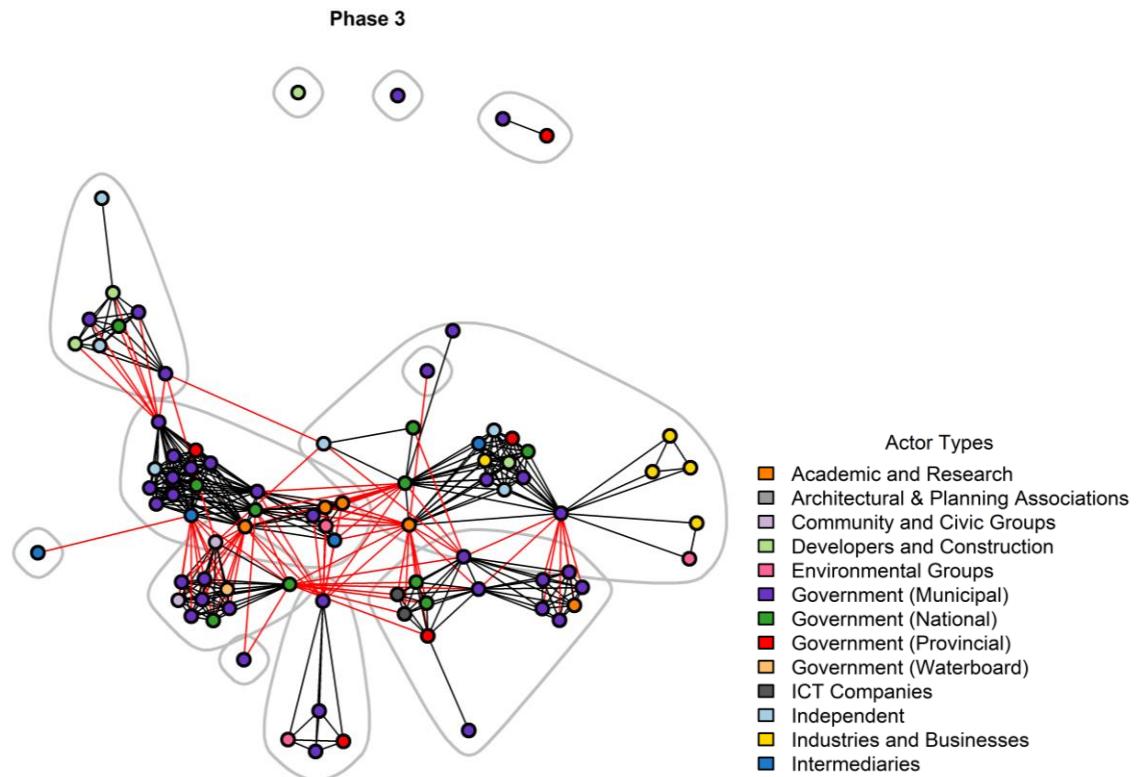


Figure I-3: Close up of the Actor Congruence Network in Phase 3

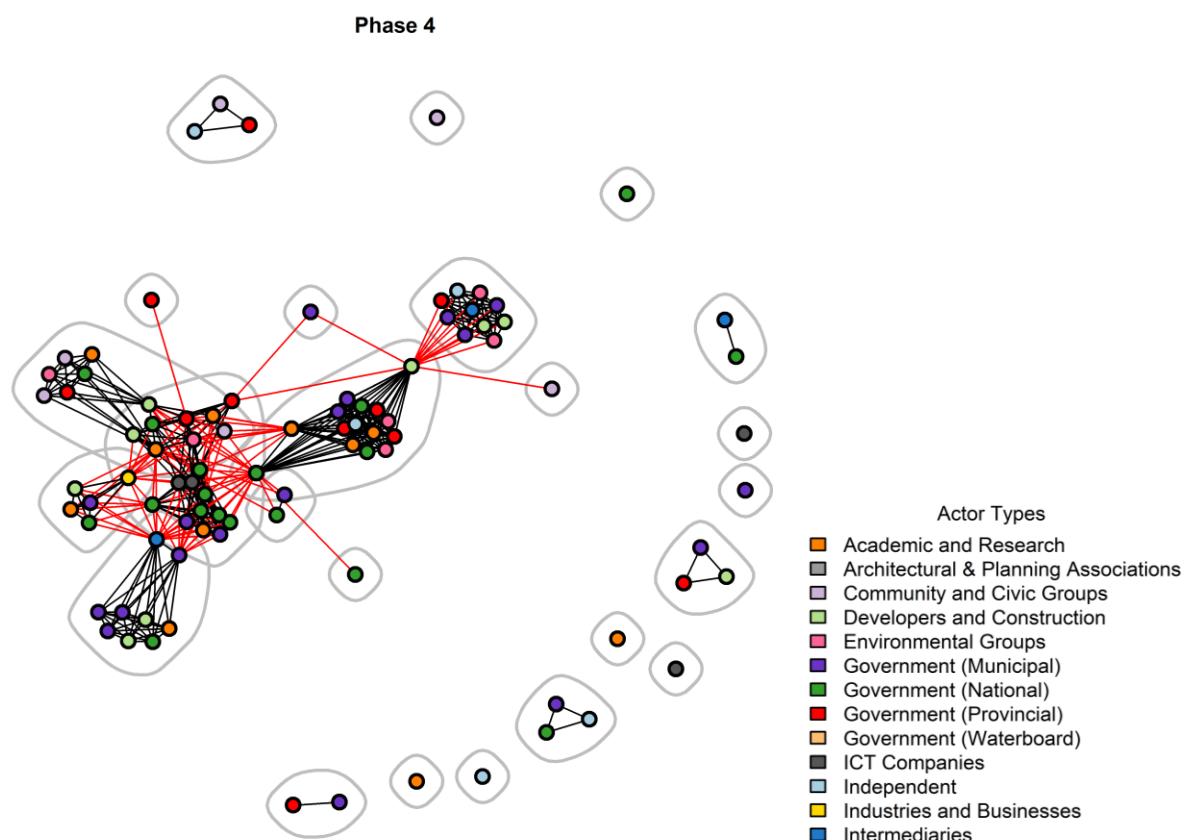


Figure I-4: Close up of the Actor Congruence Network in Phase 4

Appendix J

(Top Storylines Actor Type + Storyline Combinations per Year)

Table J-1: Table tallying the Top 3 Actor Type + Storyline combinations each Year with a statement count.

| year | actor_type | storyline | count |
|------|---------------------------|---------------------------------------------------------------|-------|
| 2024 | Government (National) | [Centralization is needed instead (C)] | 6 |
| 2024 | Government (Municipal) | [Decentralization is beneficial (D)] | 3 |
| 2024 | Government (National) | [Decentralization is beneficial (D)] | 3 |
| 2024 | Government (National) | [Introducing EPA leads to legal Issues] | 3 |
| 2023 | Government (National) | [EPA's Introduction should (Postpone)] | 5 |
| 2023 | Developers & Construction | [EPA is effective for CP (CP)] | 2 |
| 2023 | Government (Municipal) | [EPA's Introduction should (Postpone)] | 2 |
| 2023 | Government (Municipal) | [Resources are lacking for municipalities] | 2 |
| 2023 | Government (National) | [Decentralization is beneficial (D)] | 2 |
| 2023 | Government (National) | [Process of Implementation threatens me] | 2 |
| 2023 | Government (Provincial) | Implementing decentralization is difficult | 2 |
| 2023 | Government (Provincial) | [EPA does not simplify procedures (Not Simple)] | 2 |
| 2023 | Industries & Businesses | [Process of Implementation threatens me] | 2 |
| 2022 | Government (National) | [EPA's Introduction should (Postpone)] | 7 |
| 2022 | Government (National) | [EPA's Introduction should (Not Postpone)] | 5 |
| 2022 | Government (Provincial) | [Decentralization is beneficial (D)] | 3 |
| 2021 | Government (Municipal) | [Resources are lacking for municipalities] | 9 |
| 2021 | Government (Municipal) | [Process of Implementation threatens me] | 7 |
| 2021 | Government (Municipal) | [Decentralization is beneficial (D)] | 4 |
| 2020 | Government (National) | [EPA's Introduction should (Postpone)] | 3 |
| 2020 | Academic & Research | [Centralization is needed instead (C)] | 2 |
| 2020 | Developers & Construction | [EPA is effective for CP (CP)] | 2 |
| 2020 | Government (Municipal) | New noise standards hinder housing construction | 2 |
| 2020 | Government (Municipal) | [Process of Implementation threatens me] | 2 |
| 2020 | ICT Companies | [EPA's Introduction should (Postpone)] | 2 |
| 2019 | Developers & Construction | [Centralization is needed instead (C)] | 3 |
| 2019 | Government (Municipal) | [EPA is effective for CP (CP)] | 2 |
| 2019 | Government (Municipal) | [Resources are lacking for municipalities] | 2 |
| 2019 | Government (National) | Intention is good but effectiveness depends on implementation | 2 |
| 2019 | Government (National) | [EPA not effective for CP (Not CP)] | 2 |
| 2019 | Government (National) | [EPA's Introduction should (Not Postpone)] | 2 |
| 2018 | Government (Municipal) | [EPA is effective at sectoral integration] | 2 |
| 2018 | Government (Municipal) | [EPA is effective for CP (CP)] | 2 |
| 2018 | Government (National) | [Decentralization is beneficial (D)] | 2 |
| 2017 | Government (Municipal) | [Decentralization is beneficial (D)] | 2 |

| | | | |
|------|--------------------------|------------------------------------------------|---|
| 2017 | Government (Municipal) | [EPA is effective for CP (CP)] | 2 |
| 2017 | Government (National) | [Decentralization is beneficial (D)] | 2 |
| 2016 | Government (National) | [EPA not effective for CP (Not CP)] | 5 |
| 2016 | Government (Municipal) | [EPA is effective at sectoral integration] | 3 |
| 2016 | Government (National) | [Decentralization is beneficial (D)] | 2 |
| | Architectural & Planning | | |
| 2015 | Associations | [Decentralization is beneficial (D)] | 1 |
| 2014 | Government (Provincial) | [Centralization is needed instead (C)] | 1 |
| | | Simplification reduced unnecessary bureaucracy | |
| 2013 | Government (National) | [EPA simplifies procedures (Simple)] | 2 |
| 2013 | Government (National) | [Decentralization is beneficial (D)] | 1 |
| 2012 | Government (National) | [Decentralization is beneficial (D)] | 1 |
| 2012 | Government (National) | [EPA simplifies procedures (Simple)] | 1 |
| 2011 | Academic & Research | [EPA simplifies procedures (Simple)] | 2 |
| 2011 | Academic & Research | [Decentralization is beneficial (D)] | 1 |

Appendix K

(Network Calibration from Edge Weight)

Concept Congruence | Phase All

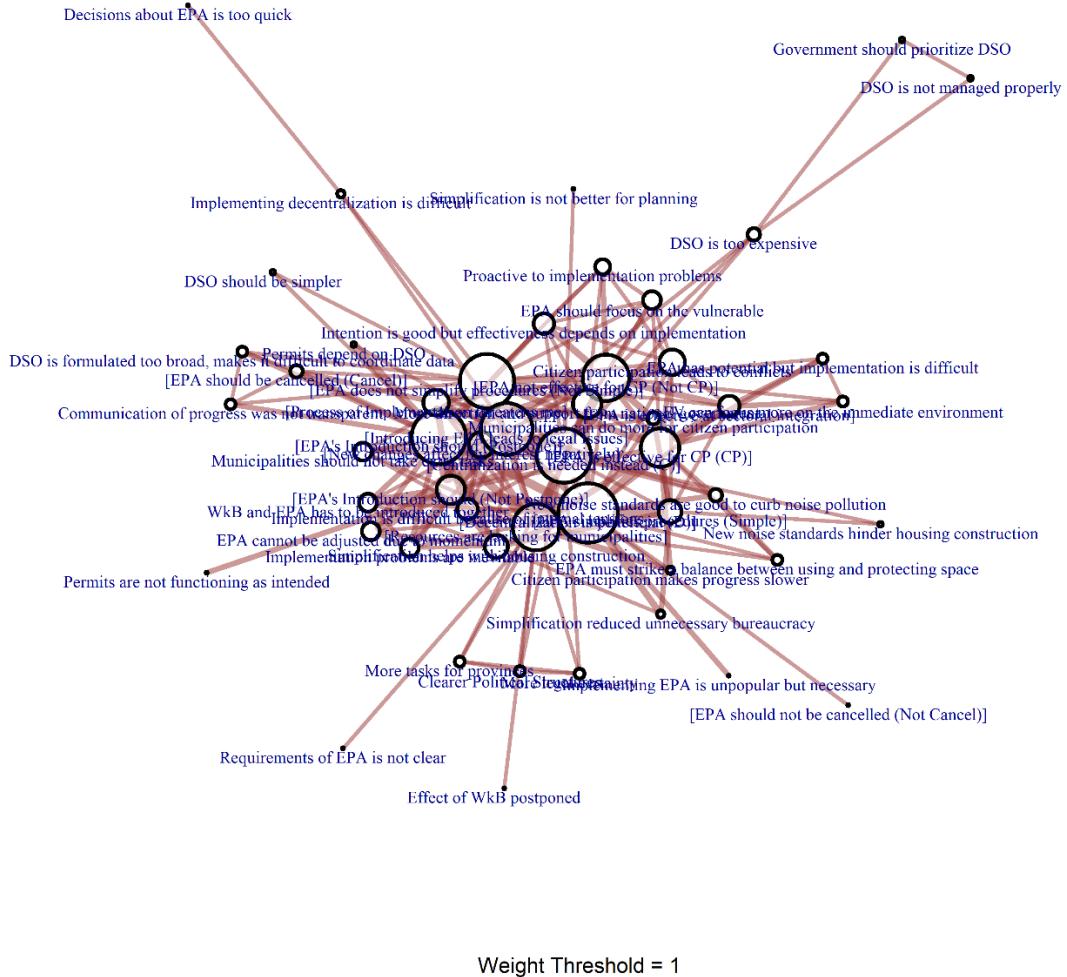


Figure K-1: Storylines congruence network with data from all phases. Edge Weight Threshold of 1 means edges with one or less connections will be removed.

Concept Congruence | Phase All

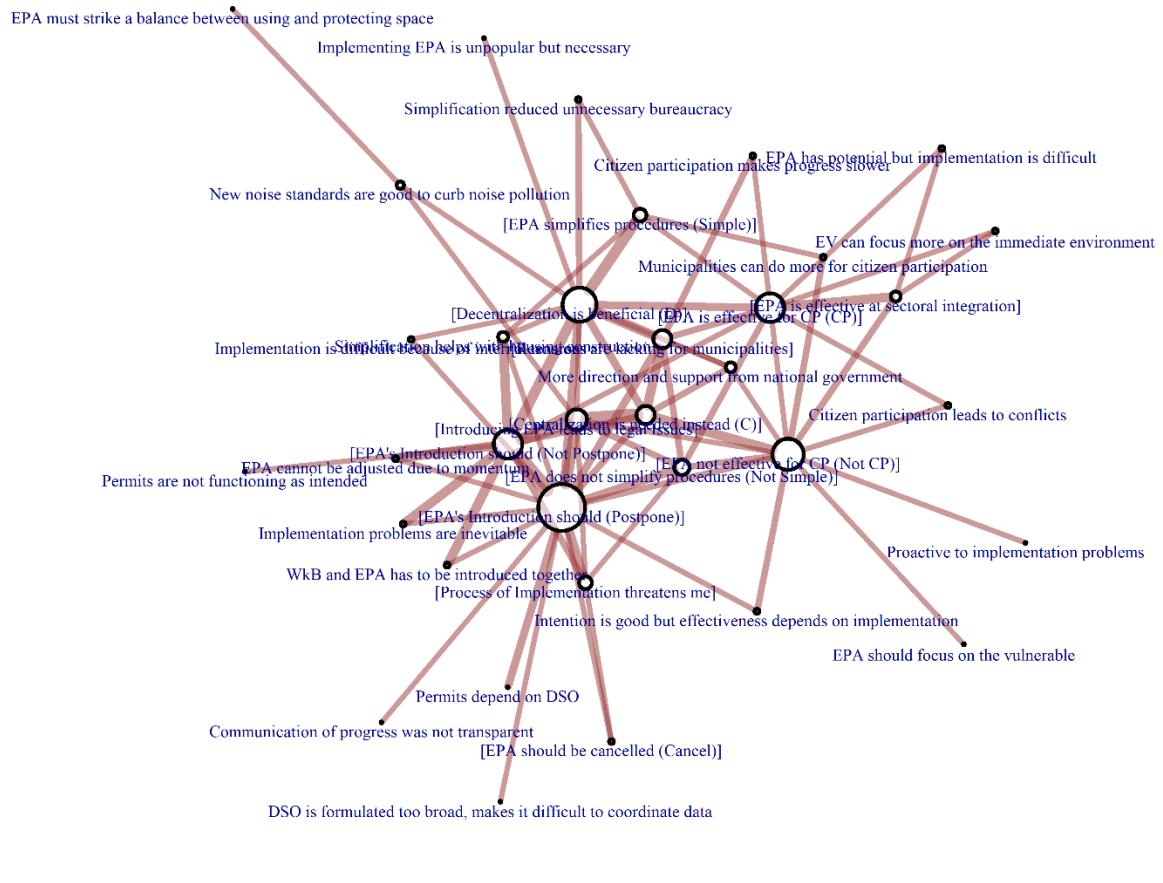


Figure K-2: Storylines congruence network with data from all phases. Edge Weight Threshold of 2 means edges with two or less connections will be removed.

Concept Congruence | Phase All

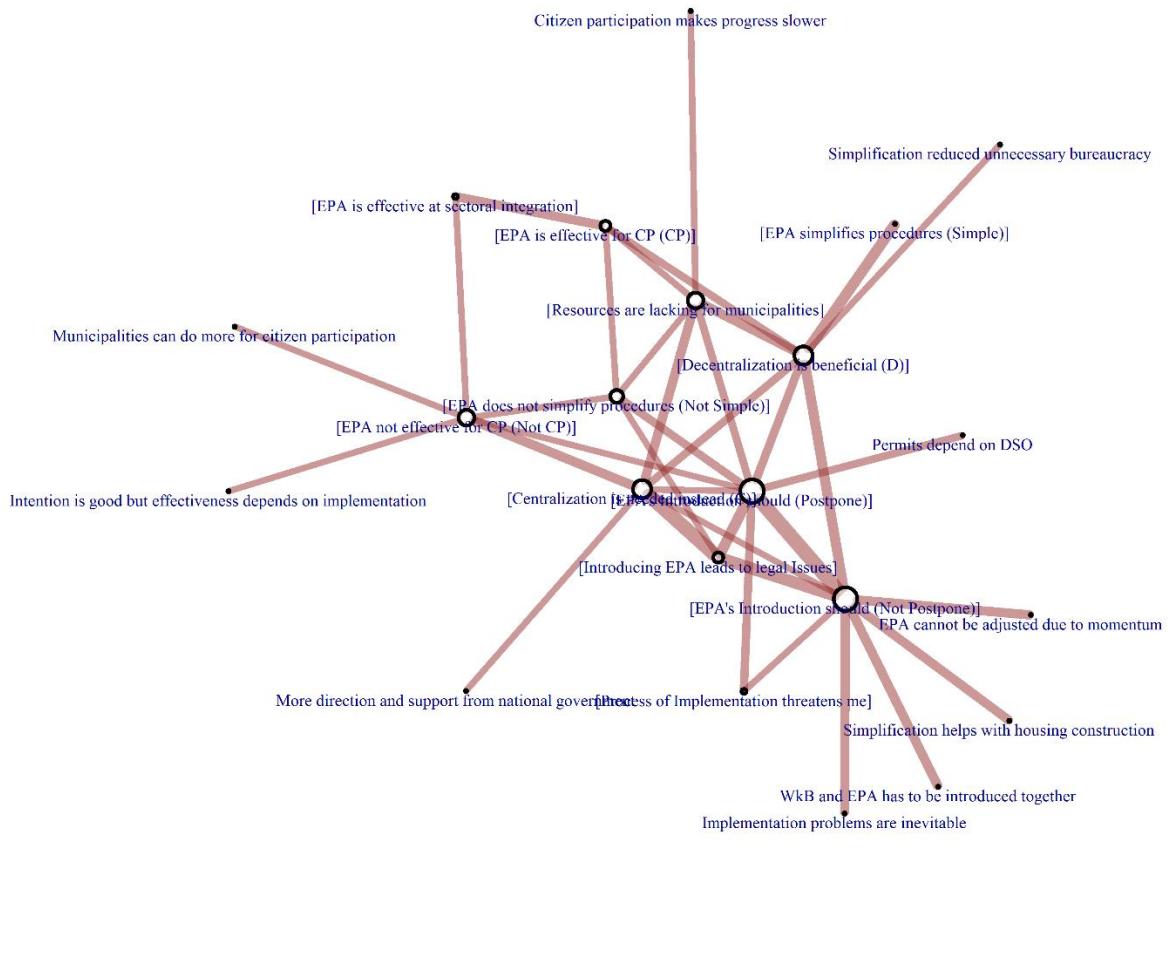


Figure K-3: Storylines congruence network with data from all phases. Edge Weight Threshold of 3 means edges with three or less connections will be removed.

Concept Congruence | Phase All

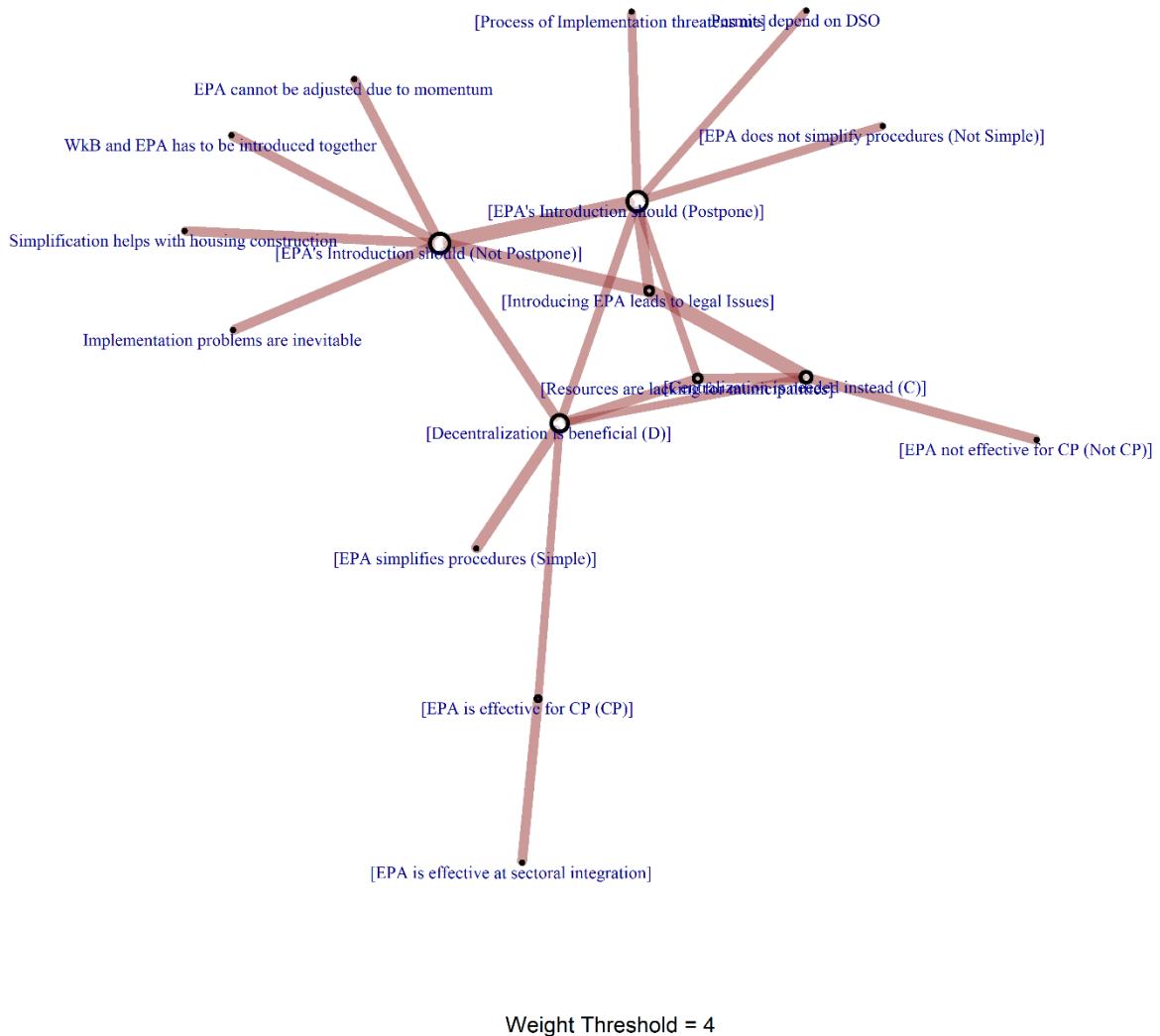


Figure K-4: Storylines congruence network with data from all phases. Edge Weight Threshold of 4 means edges with four or less connections will be removed.