

Unfolding the Role of Local Government in Policy Implementation

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Introduction

Most modern states are multi-tiered with more than one governmental layer involved in regulation and service provision (Boadway & Shah, 2009). This means many national policies are carried out by other governmental layers. Local governments have important resources which national government depend on (Goldsmith, 2012; Rhodes, 1981, 1997; Sellers, 2005). At the same time, local government is also a formal political layer with degrees of freedom to make local prioritisations (Oates, 1999; Tiebout, 1956). Taken together: Local governments have both power and discretion.

This raises the question of the role of local government in implementation of national policy goals. Should we view them as hierarchically subordinate implementation agencies, autonomous local decision-makers or perhaps co-formulators of policies to be implemented? The implementation literature has not provided us with sufficiently clear answers. The top-down literature has primarily seen implementation agencies as potential obstacles stressing the need for control. And the bottom-up literature has shifted focus entirely away from governmental layers in favour of the street-level bureaucrats. Implementation research today focuses elsewhere: On street-level behaviour as well EU implementation (Hill & Hupe, 2022; Sager & Gofen, 2022) (See also: Gollata & Newig, 2017).

This paper seeks to fill the gap by answering: *What is the role of local government in implementation of national policy?* I develop an argument that local government has a key role as an *interpreter/translator* of national policies. The argument builds on insights from the American implementation literature on federal-state relationships (Goggin et al., 1990), research on how member states customise when they implement

EU legislation (Thomann & Zhelyazkova, 2017; Zhelyazkova & Thomann, 2022) and propositions from the multi-level governance literature on nested policy cycles (Newig & Koontz, 2014).

The theoretical argument is informed by an empirical analysis of the implementation of the Danish “ghetto law” from 2018. This case offers a fruitful setting to unfold and conceptualise the role of local government with discretion built into the law, and with mandatory public development plans which make local prioritisations clearly visible. Added to this the case offers a strong comparative research design across 10 Danish cities otherwise very similar. This makes different local choices easily identifiable and a good case for developing new theoretical propositions. The law required 10 cities to make development plans for 15 designated social housing areas. The law set a fixed national target of max 40 % affordable family housing units by 2030 and provided new policy tools, but how to achieve the target remained a local decision. Publicly available documents are in this study supplemented by unique access to internal documents, correspondence and elite interviews with civil servants and politicians, which enables us to uncover processes elsewhere invisible or perhaps even deliberately hidden.

The article contributes by shedding new theoretical light on the overlooked role of local government in implementation processes and suggests renewed empirical focus on local government for the implementation literature. Specifically, the article contributes with a new conceptual understanding of the role of local government during implementation processes. This is useful both for the implementation literature and for our general understanding of how governmental layers play together which is a major topic in the multi-tier and multi-level governance literatures.

The next section reviews what the existing literature tells us about implementation in multi-layer or intergovernmental settings. I then present my argument on local governments' role as interpreters or translators of national policy during implementation and set out two expectations regarding this role. I use these expectations to guide the [preliminary] empirical exploration of the role of Danish local governments during the implementation of the Danish "ghetto law" after which I return to theory and suggest a new theoretical conceptualisation based on my findings.

The Unexplored Role of Local Government in Policy Implementation

Central-local relations and intergovernmental dynamics have been widely researched across time, countries, political systems as well as constitutional settings (e.g. Blom-Hansen, 1999a, 1999b; Boadway & Shah, 2009; Goldsmith, 2002, 2012; Goldsmith & Page, 2010; Page, 1991; Page & Goldsmith, 1987; Rhodes, 1980, 1981; Stoker, 1995; Stoker, 1991). In multi-tiered settings implementation can be viewed as a special type of relationship where (at minimum) a double democracy is at work: The superior (national) democracy makes policies, which subordinate (local) democracies implement. This gives local governments a key role in implementation of many national policies, and in some countries (Scandinavian) it has even been argued that local governments are "*...by far the most important implementing agencies of the welfare state.*" (Blom-Hansen, 1999a, p. 45).

On the one hand, it would be naïve to think of resourceful local governments as happy implementers willing to do whatever they are asked to by national policy makers (Rhodes, 1981, 1997; Winter, 1998; Winter & Nielsen, 2008). In an increasingly

urbanised world, it might be as Sellers argues: *“In the most extreme form, local actors become the principals, and hierarchical superiors within the state become the potential agents.”* (2005, p. 433). On the other hand, local governments are not free to implement just as they please but must remain within limits set by national governments (e.g. Page, 1991; Peterson, 1981). But what is the role of local governments then in the context of implementation? The implementation literature has devoted little attention to answering this question.

Pressman and Wildavsky were among the first to note “the complexity of joint action” and how this implied, that what got implemented not always was the same as what was decided (Pressman & Wildavsky, 1984 [1973]). This complexity between actors has arguably only increased, and a vast literature has over the last 20 years or so characterised systems of multi-level governance, with multiple actors and layers involved in policy processes (e.g. Hooghe & Marks, 2003; Peters & Pierre, 2001). Hill and Hupe argue that the implementation literature deals inadequately with the fact that several layers of government are often involved in policy processes, and that this leads to a “multi-layer problem” (2003; 2022, pp. 80-82). This means that what is sometimes seen as failed policy implementation could in fact be legitimate *policy co-formation* at another governmental layer. However, they do not elaborate their concept of *policy co-formation* much further than stating there is likely to exist “...an interpretive space within a complex inter-institutional framework, allowing ‘agencies’ to exercise discretion” (2022, p. 220). This interpretative space stands unexplored in the implementation literature, and as Cline argues: *“We must work toward a fuller understanding of the complex interplay between state and federal activities in*

intergovernmental implementation.” (2003, p. 80). However, scholars have recently argued that implementation research today focuses elsewhere: Namely on individual street-level behaviour as well EU implementation (Hill & Hupe, 2022; Sager & Gofen, 2022) (See also: Gollata & Newig, 2017). I seek to fill the gap on the role of local government in implementation by transferring arguments from related implementation research on the US federal system and the European Union.

In the American context, Goggin, Bowman, Lester and O’toole (1990) have argued that states are caught between pressure from above (federal layer) and below (local layer) and have proposed an intergovernmental “communications model” for implementation in a federal system where governmental layers send messages to each other. This implies that states play a constant role in *interpreting* and responding to messages from above and below. The model has been prone to some criticism, e.g. for its rather slim focus on communication (Hill & Hupe, 2022), lack of target groups (Sabatier, 1992), overlooking states’ ability to act on their own (Ibid) and an incomplete understanding of the relationship between actors and institutions (Cline, 2000) and between strategic implementation actors (Cline, 2000; Imperial, 2021). Nonetheless, it has been successfully applied in a good handful of empirical studies across a diverse range of policy areas, primarily in the US (and one Australian case) (Cline, 2003; Giunta, 2010; Hildebrand, 2015; Low & Carney, 2012; McNeal, 2013; Schmeida & McNeal, 2013). Some of the studies, however, also reveal that the “communications model” needs a more elaborate understanding of intergovernmental interdependencies (Cline, 2003; Low & Carney, 2012) and some studies also point to the importance of historical

decisions or prior experience at the state level (which is not part of the model) (Giunta, 2010; Hildebrand, 2015; McNeal, 2013).

Similarly, a part of the EU implementation literature has been interested in questions of compliance (Mastenbroek, 2005, pp. 1109-1110; Thomann & Sager, 2017; Thomann & Zhelyazkova, 2017). In this literature it has been suggested, we need to investigate how rules from the EU layer are *transposed* or *customised* on the national layer below.

Thomann and Zhelyazkova (2017; 2022) argue that domestic politics matters (closer to the source of the problem to be solved) and that customisation matters for practical compliance. This resembles the core argument in the “communications model”. I combine these insights and argue that we in the same way can perceive of local government – or even more broadly any subordinate implementation agent with representative democratic organs - as an interpreter or translator, which turns policy from above into something that makes sense locally. It is the aim of this paper to elaborate and conceptualise this role through the empirical case.

Before I turn to empirics, I set out two expectations on the role of local government and how local government plays together with national government in the context of implementation. First, as already argued, as an implementation agent local government has considerable discretion and power. Rhodes argues, organisations will exchange resources in a series of bargaining games to maximise own influence (Rhodes, 1981; 1997, pp. 8-9). Local governments will therefore try to maximise influence towards national layer, minimise implementation costs and maximise output in accordance with local preferences and conditions. This includes social, economic and political factors at the local level (Cline, 2003) and based on the studies mentioned above (Giunta, 2010;

Hildebrand, 2015; McNeal, 2013), I add historical factors to be of importance (Hall & Taylor, 1996; Pierson, 2000).

The first expectation regarding implementation by local government therefore is that *implementation of national legislation by local government encompasses a discretionary room for interpretation, which local governments will seek to exploit in accordance with local preferences and conditions.*

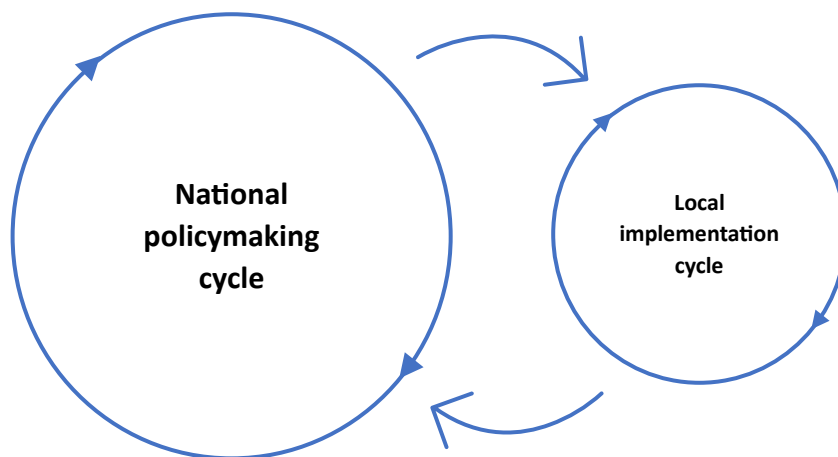
The second expectation is about the relationship between governmental layers and the recurring discussion within the implementation literature of where policy formation stops, and policy implementation begins? Pülzl and Treib have summed up this long-standing debate by stating that:

“Bottom-uppers have successfully convinced the wider community of implementation scholars that implementation is more than the technical execution of political orders from above. It is itself a political process in the course of which policies are frequently reshaped, redefined or even completely overturned.”(Pülzl & Treib, 2007, p. 100)

In a similar vein Newig and Koontz (2014) have argued we can perceive EU policy implementation as involving nested policy cycles. When the policy process at the EU goes from agenda setting over decision to the implementation stage, a secondary policy cycle at the subordinate level begins with e.g. drafting of local initiatives, decision and implementation (2014, pp. 256-257). This second policy cycle feeds back to the primary policy cycle’s evaluative stage. I argue the relationship between national and local government and the policy formation and policy implementation stages

might be viewed in the same way – but that feedback might take place much earlier than formal evaluation. Resourceful local governments are likely to reach to national government as soon as it becomes clear, that national government is likely to impose new implementation tasks that may or may not be in line with local wishes. I therefore expect that *implementation of national policy by local government can be perceived of as a subordinate policy cycle nested in the national policy cycle with feedback loops and interaction between government layers.*

Figure 1: Nested cycles: Linking national legislation with local implementation



Note: Adapted and simplified from Newig and Koontz (2014)

Design

The study is designed as an exploratory case study (Gerring, 2017; Yin, 1994) with the primary aim of developing a more theoretically rich understanding of the role of local government during implementation (analytical generalisation) (Yin, 1994, p. 10). I have, however, also set out an argument with expectations that local government plays a role as an interpreter or translator during implementation. I use these, not as traditional deductive hypotheses to be tested, but to provide analytical focus to the empirical

section. In short: The empirical material is used to describe in order to build new theory on the role of local government in implementation (Kreuzer, 2019).

I argue the Danish ghetto law is a fruitful setting for this purpose and my case selection strategy goes like this: To unfold and explore the role of local government we need to investigate a policy area where national government formulates policy and where local government is responsible for implementation (basic condition for the present research question). Second, to uncover the “interpretative room” and how it is used across cities, we should ideally investigate a policy area, where local governments hold important resources and have some degrees of freedom on implementation. This will maximise our chances of seeing local interpretation/translation taking place. Third, we should aim for a case, where it is possible to uncover both the interplay between governmental layers as well as what happens when local governments interpret/translate. This means processes and interplay should be investigable in such a way that we are able to shed light on interplay and processes. Finally, as I have also set out an expectation that local interpretation/translation is likely to vary depending on local preferences and conditions, we should prefer a case which offers within-case variation (Gerring, 2017, p. 30) to be able to identify how local interpretation/translation varies within the case.

The Danish “ghetto law” from 2018 poses such a setting. First, second-layer discretion is built into this specific law as local governments are required to formulate local development plans together with housing organisations as the first step in local implementation. Thus, in this empirical setting we are very likely to see the role of local government unfolding at first hand. Second, the requirements in the ghetto law pushes

understandings, prioritisations, and decisions at the local level out into publicly available documents. Combined with unique access to also internal policy documents, we can get a full understanding of this specific case and thus study mechanisms which in other implementation processes may be invisible or perhaps even deliberately hidden. Third, the case offers a strong within-case comparative research design across 10 Danish cities otherwise very similar (Collier, 1993; Lijphart, 1971; Møller, 2012; Ragin, 1987; Yin, 1994). This makes different local choices easily identifiable and a good case for exploring variation as a basis for developing new theoretical propositions. However, as argued, the overall research aim is not so much on explaining different outcomes, as it is to describe and explore the role of local government. Therefore, the variation discovered across cases on how implementation/translation takes place, will in this study be used to build an encompassing ideal type of the underlying dimensions that the role of local government entails during implementation of national legislation. Finally, although Denmark is a unitary state, it is also a very decentralised state (Boadway & Shah, 2009), where local government has large degrees of freedom. This should make findings generalisable also to other systems, e.g. federal systems where lower political layers have formal policy-making prerogatives.

The Danish “Ghetto” Law

I now present key elements of the Danish “ghetto law” from 2018 followed by a presentation of data sources. Since the turn of the century different Danish governments have tried to tackle problems in the so-called “ghettoes” (Regeringen, 2010, 2014, 2018). In 2018 new legislation was passed, colloquially known as the “the

ghetto law”¹. This was a framework law: The law made it mandatory to change the housing mix in the “hard ghettos” (defined by criteria in the law) to max 40 % affordable family housing units by 2030. Most areas were prior to the law comprised almost exclusively of social housing units (i.e. 100 % or close to this). The law provided new or reinforced tools to change the housing composition: Demolitions, selling off land to private development, selling off existing housing units to become private owned, building new private housing or commercial dwellings, and relabelling existing family housing into housing for either young people or elderly. A parallel law² provided financial support for housing associations from The National Building Fund to be able to implement the chosen measures. How to mix the new tools remained a local agreement between municipalities and housing organisations. Importantly, the law also offered some options for dispensation which made it possible for some areas to reach for a target percent higher than 40 (higher target percent equals less change in housing composition). Dispensation required ministerial approval. As the development plans were decided during 2019 it was clear that very different plans for the designated 15 housing areas (across 10 municipalities) were made (Trafik-, Bygge- og Boligstyrelsen, 2019).

¹ I use the term “ghetto law” to refer only to the changes made to “Lov om almene boliger” which demanded physical development plans to be made (L38 2018/2019). The law was part of a “package” which also included legislation on other policy areas such as socially mixed childcare, sanctions for children not going to school and higher penalties.

² L39 (2018/2019)

Data

The analysis of the role of local government in the implementation of the “ghetto law” is based on a range of primarily qualitative data. These include the before-mentioned publicly available development plans and municipal decision documents. All publicly available national political agreements and legislative documents from parliament as well as unique access to all relevant internal documents and correspondence regarding the ghetto law from the former Ministry of Transport and Housing and selected municipalities (at the time of writing [November 2023] this includes the City of Aarhus) from the period autumn 2017 to autumn 2019 when development plans were formally approved. These valuable written sources which have supported real-world processes and decisions, will be combined with elite interviews with key civil servants and national and local politicians [not conducted per November 2023]. Interviews will be aimed to triangulate findings and to fill gaps not covered by written material and to ask for motives and links between events and actions. Finally, media coverage and research reports supplement the primary sources where relevant.

Table 1: Overview of Data on “Ghetto Law”, Q3 2017- Q3 2019

Type of data	Source	Amount
Political agreements Legislative documents	Danish Government Danish Parliament (L38 and L39 2018/2019)	Approx. 1.300 pages
Internal ministerial documents and correspondence	Ministry of Transport and Housing (includes material from other relevant ministries)	Approx. 29.000 pages

Local development plans and decision documents	10 municipalities covering 15 “ghettoes” ³	Approx 3.300 pages
Internal municipal documents and correspondence	1-2 municipalities covering 2-4 “ghettoes”	[TBD]
Elite interviews	Civil servants from ministries and municipalities National and local politicians	[TBD] 4-6 interviews w. ministerial civil servants 2 interviews w. national politicians 2 interviews w. mayors 4-6 interviews w. municipal civil servants
Media and research reports	National and local newspapers (online) Sector reports from VIVE and BUILD ⁴	-

Data collection followed two tracks: A national and a local. In the national track a partnership agreement was made with the relevant ministry to be granted access to the internal documents on the preparation and early implementation of the law as well as to relevant correspondence. This resulted in a large number of diverse documents covering background material, memos, political proposals, letters and correspondence, emails, cover letters, preparatory material for the minister, press releases etc.

Documents were pre-sorted in large pdf’s comprising all documents in the original cases in the file system in the ministry, such as documents for: Ministerial committee on parallel societies, the ministerial coordination committee, the economic committee,

³ Municipalities (areas): Esbjerg (Stengårdsvej), Holbæk (Agervang), Horsens (Sundparken), Høje Taastrup (Gadehavegaard, Taastrupgaard), Kolding (Munkebo, Skovvejen/Skovparken), København (Mjølnerparken, Tingbjerg/Utterslevhuse), Odense (Vollsmose), Slagelse (Motalavej, Ringparken), Vejle (Finlandsparken) and Aarhus (Bispehaven, Gellerup/Toveshøj)

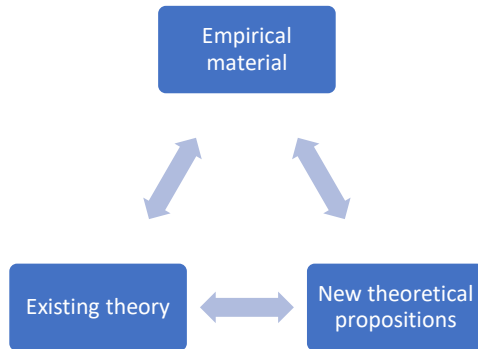
⁴ Harvested from www.udsatteomraader.dk

political negotiations, legislative process, meetings with parliamentary speakers, approval of development plans etc.

At the same time parliamentary documents were harvested online (Proposed bill, parliamentary minutes, Q and As, recommendations and amendments from the parliamentary committee etc.). This is to be followed by elite interviews with relevant actors [not yet conducted]. In the local track all development plans were harvested from the ministerial webpage. This was combined with collection of local decision documents from municipal webpages (The development plans were appendices to these). This is supplemented by internal documents from a selection of municipalities (again covering all types of internal, close-to-decision-process documents: memos, emails, political proposals, letters, minutes etc.), and again this will be followed by elite interviews with relevant actors from a subset of municipalities [not yet conducted].

All written materials were analysed in an iterative process. With large amounts of data covering thousands of pages, I used a three-fold analytical strategy: 1) Skim, 2) read, and 3) interpret (Bowen, 2009). Regarding interpretation of the material, I on the one hand set out with my two theoretical propositions in mind, on the other hand I kept it open that I could encounter new information and themes within the material. The analytical process was then a matter of working back and forth between my case and theory (existing theory and new propositions) (Schwartz-Shea & Yanow, 2012, pp. 27-29; Swedberg, 2011, 2017).

Figure 2: Simplified illustration of the analytical process



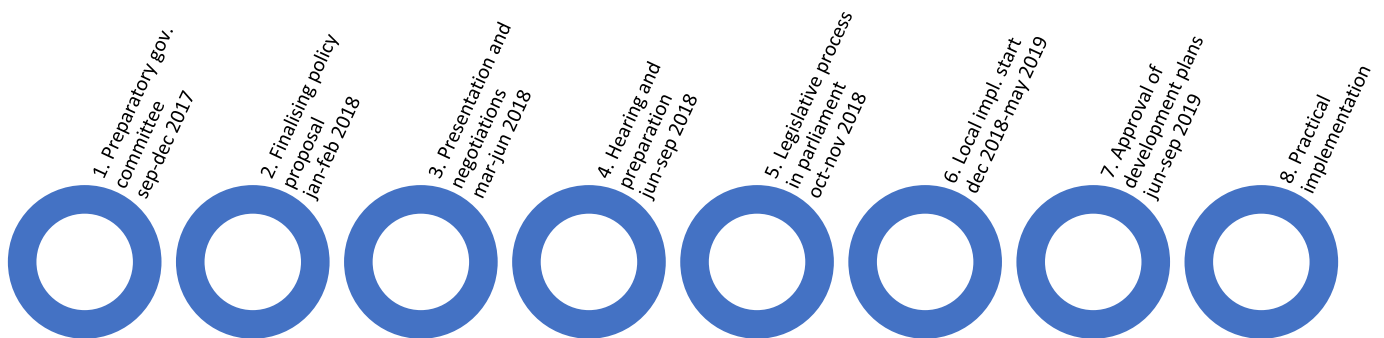
Specifically, the analytical process proceeded as follows: National written documents were skimmed, and key passages marked for later retrieval. These documents and passages were then read and interpreted. This was especially useful for establishing timelines, different policy positions, policy development, political processes, local factors as well as interaction between governmental layers and other actors. Local decision documents and development plans were summarised in 1-2 pages long case reports focusing on key elements of each plan, political positions, cooperation with housing associations, prior steps/policies in the city/area and the local process together with some illustrative quotes. An overview of implementation tools and choices was made using a spreadsheet. These preliminary case overviews are later to be elaborated through interviews aimed to fill gaps not covered by written material and to ask for motives and links between events and actions [Interviews not yet conducted]. Having taken these steps, I then contrasted empirical findings with existing theory to set out new theoretical propositions.

Preliminary Findings [Work-in-progress]

[As I am not yet finished with the data collection and data analysis, I only present some preliminary findings below. Quotes/extracts are not included at this point.]

The new law came about after a preparatory process within government during autumn/winter 2017-2018. A political package of proposals was presented 1st of March 2018 followed by political negotiations in parliament. Then came a traditional hearing process over the summer followed by a legislative process in the autumn months of 2018. The final bill was effective from 1st of December 2018 giving municipalities and housing organisations 6 months to start implementation by preparing local development plans to be send to the Ministry of Housing and Transport for approval no later than 1st of June 2019.

Figure 3: Timeline – from preparation to implementation



The analysis below is structured chronologically. Respecting that it can be difficult to draw clear lines between political phases, I divide the analysis into two broad sections:

1) National preparation, negotiation and legislation. This is from the first conception of

a policy process to the end of the legislative process which inherently is a national process. 2) Local processes in concerned municipalities- covering early preparation to practical implementation begins. My preliminary findings suggests that these two processes overlap a good deal.

Table 2 presents an overview of local governments’ actions in the different political phases. The last column highlights how these actions corresponds to different facets of the role local governments have.

Table 2: Local Governments’ Actions in Different Phases

Phase	Local governments’ actions	Role
1. Preparatory gov. committee sep-dec 2017	Hosting visiting ministries (Aarhus, Odense) Some municipalities contact/seek to influence committee	Preparing Influencing – making aware of problems and possible solutions
2. Finalising policy proposal jan-feb 2018 3. Presentation and negotiations mar-jun 2018	Investigate local consequences if proposal turns into reality (what does it mean for us) Influencing – letters or media Local political anchoring (§17,4-committees or other political fora) Local political discussions, including framing	Investigating Influencing Political anchoring
4. Hearing and preparation jun-sep 2018 5. Legislative process in parliament oct-nov 2018	Investigate local consequences Influence – formal response to hearing and other channels Local political anchoring Local political discussions, including framing Start of negotiations with housing associations	Investigating Influencing Political anchoring Preparing implementation
6. Local impl. start dec 2018-may 2019	Draft development plans Frame and connect to local situation, existing local policies and prior efforts Decision on 1) Level of ambitions (dispensation or not?) 2) Mix of policy tools (hard/soft tools) 3) Expansion or reduction of geographical area?	Transposing national legislation to local setting Balancing local interests Establishing extra initiatives

	<p>4) Supplementary efforts (not required by law)</p> <p>Formal negotiations with housing associations</p> <p>Political discussions in council</p> <p>Formal decision of plan to ministry (target, tools, finance, timeline, organisation etc.)</p>	Making formal implementation decision
<p>7. Approval of development plans jun-sep 2019</p> <p>8. Practical implementation</p>	<p>Preparations start</p> <p>Dialogue with ministry/agency (questions, amendments)</p> <p>Planning, projecting</p> <p>Carrying out first initiatives</p> <p>Feedback to ministry, evaluation (Implementation forum, ghetto representatives, yearly assessment) (legally required)</p>	<p>Planning and projecting</p> <p>Carrying out</p> <p>Engaging in dialogue and feeding back</p>

As can be seen local governments took on a range of very different tasks when faced with this new national legislation.

National preparation, negotiation and legislation

Already in the autumn of 2017 – a year before the legislative process formally began in Danish Parliament – some municipalities (Aarhus, Copenhagen) were actively trying to influence the future policy proposal that government was working on. This included pointing at problems, new legislation should try to fix as well as pointing out consequences of new national proposals.

Such efforts continued and are also present in other cities after government had publicly announced its proposal in spring 2018. Investigating consequences, communicating these to government and establishing local political anchoring points were key tasks at this stage. Almost all municipalities established some sort of political arena for local discussions and preparation. This took different forms: In two cities political negotiations were made ending with written political agreements on future implementation (Odense, Aarhus) (before legislation was passed), five cities

established or continued temporary political committees⁵ on this specific policy area, two cities anchored political discussions in other forums (Copenhagen and Vejle) and only one city made no special political anchoring point (Holbæk). These anchoring points were used to prepare implementation in different ways: To investigate consequences, work with scenarios, (prepare) discussions with housing associations etc. Over the summer a formal hearing process took place, which several municipalities – and the interest group Local Government Denmark (KL) - participated in. Some municipalities were also active during the subsequent parliamentary process trying to influence legislation once again. In accordance with the theoretical expectation, it is clear from these processes that local governments tried to exploit their position as future implementation agencies already in early policy stages. It is also clear that a local *political* policy process started – and in some instances this was long before legislation was even passed and there was something to implement. Again, this corresponds with the theoretical expectation.

Local preparation and implementation

When the law was passed in November 2018, local governments began formally transposing the new legislation to the local setting. The key process here consisted of drafting of development plans. This was done through negotiations between housing associations and political and/or administrative representatives from council. In this process local government had a key role in balancing different local interests and finding a way to implement locally that made sense politically, socially, economically

⁵ “§17, 4-committees” – referring to a specific paragraph in the Danish regulation of local governments, which allows for such non-standing committees (Høje Taastrup, Kolding, Slagelse, Esbjerg and Horsens)

and with regards to historical efforts. In this phase key decisions were made on whether to apply for dispensation (where applicable), how to view the geographical area (the law included options to narrow or enlarge this after application) and of course how to mix the specific policy tools provided by the new law to achieve the national target. Most development plans mention explicitly what existing social housing efforts (including prior or planned regeneration of social housing in the areas), local plans or other local policies were in the areas/municipalities and builds the local implementation of the new law onto these existing efforts. Other key arguments for the specific local implementation choices include economic arguments (such as not tearing down newly renovated housing units), preserving a critical amount of social housing in the municipality or establishing specific types of housing (e.g. for students) for which there is high demand (i.e. social and demographic arguments). Further, all development plans added extra local initiatives which were not formally required by law. Typically, this included a range of targeted social services, job efforts, efforts to prevent crime etc., but in some instances also municipal investments in new infrastructure or public functions which are not funded by national government. This phase of implementation ended with formal decisions on development plans by housing organisations and local councils. All development plans were approved with majorities of at least 2/3 of the council votes (and most plans (12/15) with more than 80 % in favour) indicating a high degree of consensus among most local politicians.

Table 3: Different implementation choices across municipalities and areas

Housing area	Municipality	Dispensation	Plan target percent*	Demolition percentage**
Finlandsparken	Vejle	1. Granted	68%	0%
Sundparken	Horsens	1. Granted	60%	0%
Munkebo	Kolding	1. Granted	60%	6%
Motalavej	Slagelse	1. Granted	58%	38%
Agervang	Holbæk	1. Granted	56%	0%
Ringparken	Slagelse	2. Not granted	40%	17%
Skovvejen/Skovparken	Kolding	2. Not granted	38%	26%
Mjølnerparken	København	3. Not eligible/applied	40%	5%
Gadehavgård	Høje-Taastrup	3. Not eligible/applied	40%	26%
Taastrupgaard	Høje-Taastrup	3. Not eligible/applied	40%	29%
Bispehaven	Aarhus	3. Not eligible/applied	40%	37%
Stengårdsvej	Esbjerg	3. Not eligible/applied	39%	20%
Tingbjerg/Utterslevhuse	København	3. Not eligible/applied	39%	2%
Vollsmose	Odense	3. Not eligible/applied	35%	35%
Gellerupparken/Toveshøj	Aarhus	3. Not eligible/applied	32%	39%

* As stated in development plans except for Gellerup where it is calculated using ministerial guidelines (Low percentage indicates more change)

** Calculated as share of housing units (to be) demolished out of total os social housing units in base year 2010 (High percentage indicates more demolishment)

Table 3 gives an overview of different implementation choices across cities and housing areas. As can be seen, the different development plans have very different target percentages: This can be seen as a measure of how much the housing areas are to be physically changed (note that target percentage refers to the remaining amount of social family housing units, which means that a lower percentage means more change). Target percentages over 40 can only be reached after being granted dispensation, and dispensation was only eligible for some areas. The table also includes the share of housing units to be demolished – again this percentage is highly skewed as some tear down very few housing units and some a substantial amount. These differences clearly

indicate that a local adaption of the national intentions has taken place. Again, this corresponds with the theoretical prediction of a discretionary room, which local governments used to their own (local) best – based on local preferences and conditions.

The local implementation processes also give a good picture of the content of the secondary (local) policy processes. The role of local government in these processes entails discussions, prioritisation, and decisions on local matters, but also includes interaction and feedback to the national political layer.

Final plans included also details on finance, organisation, timeline etc. and were sent to the ministry for formal approval. Only after this could planning and projecting as well as actual carrying out (practical implementation) begin. This final phase in the investigated period also included a close dialogue with the Ministry of Transport and Housing, where a new “implementation forum” was established. This forum was used to pass information, share knowledge and give room for feedback between senior civil servants from the ministry and the relevant municipalities. The forum is also used to identify and clear out obstacles which might occur as implementation takes place towards 2030, where all development plans must be realised.

Theoretical Implications [work-in-progress]

Based on the preliminary analysis I now briefly return to the theoretical expectations, I set out. Based on the existing literature, I expected that local implementation would take place in a discretionary room and how local governments would seek to use this

based on local preferences and conditions. Further, I expected that this could be viewed as a secondary policy cycle nested within the national cycle with interaction between the two. Both expectations are evident in the preliminary analysis of the Danish “ghetto law”. At the same time, the empirical material has allowed to put more substance on the role of local governments in implementation processes. The Danish “ghetto law” has highlighted that local implementation of national policy indeed is much more than practical carrying out (Gollata & Newig, 2017; Pülzl & Treib, 2007). Local governments’ role in implementation covers a wide range of different activities. In figure 4 below, I use these insights to propose a new ideal type of the multi-faceted role local government has in implementation.

Figure 4: Ideal Type of Local Government’s Multi-Faceted Role in Implementation



The empirical material has also pointed out that local implementation is a politically anchored and politically led process. Implementation choices are not administrative technicalities left to the bureaucrats. The local process is kept close to council and local politicians are deeply involved in how the law should be implemented locally. This corresponds with the parts of the implementation literature that has acknowledged that implementation is a political process in which policy continues to shaped (e.g. Bardach, 1977; Barrett & Fudge, 1981; Hill & Hupe, 2022; Hjern & Hull, 1982; Nakamura & Smallwood, 1980; Pülzl & Treib, 2007; Rhodes, 1981).

Literature

- Bardach, E. (1977). *The implementation game : what happens after a bill becomes a law* (2. print. ed.). MIT Press.
- Barrett, S., & Fudge, C. (1981). Examining the Policy-Action Relationship in Susan Barrett and Colin Fudge, *Policy and Action*, London: Methuen, pp. 3-32. In P. Healey & J. Hillier (Eds.), *Foundations of the Planning Enterprise* (pp. 453-486). Routledge.
<https://doi.org/10.4324/9781315255101-35>
- Blom-Hansen, J. (1999a). Avoiding the 'joint-decision trap': Lessons from intergovernmental relations in Scandinavia. *European Journal of Political Research*, 35(1), 35-67.
<https://doi.org/10.1023/A:1006944112085>
- Blom-Hansen, J. (1999b). Policy-Making in Central-Local Government Relations: Balancing Local Autonomy, Macroeconomic Control, and Sectoral Policy Goals. *Journal of Public Policy*, 19(3), 237-264. <http://www.jstor.org/stable/4007671>
- Boadway, R., & Shah, A. (2009). *Fiscal Federalism: Principles and Practice of Multiorder Governance*. Cambridge University Press. <https://doi.org/10.1017/CBO9780511626883>
- Bowen, G. A. (2009). Document Analysis as a Qualitative Research Method. *Qualitative Research Journal*, 9(2), 27-40. <https://doi.org/10.3316/qrij0902027>
- Cline, K. D. (2000). Defining the Implementation Problem: Organizational Management versus Cooperation. *Journal of public administration research and theory*, 10(3), 551-572.
<https://doi.org/10.1093/oxfordjournals.jpart.a024281>
- Cline, K. D. (2003). Influences on Intergovernmental Implementation: The States and the Superfund. *State politics & policy quarterly*, 3(1), 66-83.
- Collier, D. (1993). The Comparative Method. In A. W. Finifter (Ed.), *Political Science: The State of the Discipline II* (pp. 105-119). American Political Science Association.
- Gerring, J. (2017). *Case Study Research: Principles and Practices* (2 ed.). Cambridge University Press. [https://doi.org/DOI: 10.1017/9781316848593](https://doi.org/DOI:10.1017/9781316848593)
- Giunta, N. (2010). The National Family Caregiver Support Program: A Multivariate Examination of State-Level Implementation. *Journal of Aging & Social Policy*, 22(3), 249-266.
<https://doi.org/10.1080/08959420.2010.485523>
- Goggin, M. L., Bowman, A. O. M., Lester, J. P., & O'Toole, L. J. (1990). *Implementation theory and practice : toward a third generation*. HarperCollins Publishers.
- Goldsmith, M. (2002). Central Control over Local Government - A Western European Comparison. *Local Government Studies*, 28(3), 91-112.
<https://doi.org/10.1080/714004150>
- Goldsmith, M. (2012). Cities in Intergovernmental Systems. In P. John, K. Mossberger, & S. E. Clarke (Eds.), *The Oxford Handbook of Urban Politics* (pp. 0). Oxford University Press.
<https://doi.org/10.1093/oxfordhb/9780195367867.013.0008>
- Goldsmith, M. J., & Page, E. C. (2010). *Changing Government Relations in Europe: From localism to intergovernmentalism* (Vol. 67). Routledge. <https://doi.org/10.4324/9780203858486>
- Gollata, J. A. M., & Newig, J. (2017). Policy implementation through multi-level governance: analysing practical implementation of EU air quality directives in Germany. *Journal of European public policy*, 24(9), 1308-1327.
<https://doi.org/10.1080/13501763.2017.1314539>
- Hall, P. A., & Taylor, R. C. R. (1996). Political Science and the Three New Institutionalisms. *Political Studies*, 44(5), 936-957. <https://doi.org/10.1111/j.1467-9248.1996.tb00343.x>
- Hildebrand, S. (2015). Coerced Confusion? Local Emergency Policy Implementation After September 11. *Journal of Homeland Security and Emergency Management*, 12(2), 273-298. <https://doi.org/doi:10.1515/jhsem-2014-0054>
- Hill, M., & Hupe, P. (2003). The multi-layer problem in implementation research. *Public Management Review*, 5(4), 471-490. <https://doi.org/10.1080/1471903032000178545>

- Hill, M., & Hupe, P. (2022). *Implementing Public Policy: An Introduction to the Study of Operational Governance*. SAGE.
- Hjern, B., & Hull, C. (1982). Implementation Research as Empirical Constitutionalism. *European Journal of Political Research*, 10(2), 105-115. <https://doi.org/10.1111/j.1475-6765.1982.tb00011.x>
- Hooghe, L., & Marks, G. (2003). Unraveling the Central State, but How? Types of Multi-level Governance. *The American political science review*, 97(2), 233-243. <https://doi.org/10.1017/S0003055403000649>
- Imperial, M. T. (2021). Implementation Structures: The Use of Top-Down and Bottom-Up Approaches to Policy Implementation. In *Oxford Research Encyclopedia of Politics*. <https://doi.org/10.1093/acrefore/9780190228637.013.1750>
- Kreuzer, M. (2019). The Structure of Description: Evaluating Descriptive Inferences and Conceptualizations. *Perspectives on Politics*, 17(1), 122-139. <https://doi.org/10.1017/s1537592718001068>
- Lijphart, A. (1971). Comparative Politics and the Comparative Method. *American Political Science Review*, 65(3), 682-693. https://EconPapers.repec.org/RePEc:cup:apsrev:v:65:y:1971:i:03:p:682-693_13
- Low, S., & Carney, T. (2012). Inter-Governmental Policy Implementation: State Inducements to Encourage Implementation at the Local Level. *International Journal of Public Administration*, 35(3), 177-193. <https://doi.org/10.1080/01900692.2011.635489>
- Mastenbroek, E. (2005). EU compliance: Still a 'black hole'? *Journal of European public policy*, 12(6), 1103-1120. <https://doi.org/10.1080/13501760500270869>
- McNeal, R. (2013). State Response to Obama's Broadband Access Policy: A Study in Policy Implementation. In V. Weerakkody & C. G. Reddick (Eds.), *Public Sector Transformation through E-Government* (pp. 251-262). Routledge. <https://doi.org/10.4324/9780203096680-27>
- Møller, J. (2012). *Statsdannelse, regimeforandring og økonomisk udvikling : en introduktion til komparative historiske analyser*. Hans Reitzel.
- Nakamura, R. T., & Smallwood, F. (1980). *The politics of policy implementation*. St. Martin's Press.
- Newig, J., & Koontz, T. M. (2014). Multi-level governance, policy implementation and participation: the EU's mandated participatory planning approach to implementing environmental policy. *Journal of European public policy*, 21(2), 248-267. <https://doi.org/10.1080/13501763.2013.834070>
- Oates, W. E. (1999). An Essay on Fiscal Federalism. *Journal of economic literature*, 37(3), 1120-1149. <https://doi.org/10.1257/jel.37.3.1120>
- Page, E. C. (1991). *Localism and Centralism in Europe: The Political and Legal Bases of Local Self-Government*. Oxford University Press. <https://doi.org/10.1093/acprof:oso/9780198277279.001.0001>
- Page, E. C., & Goldsmith, M. J. (1987). *Central and local government relations : a comparative analysis of West European unitary states*. Sage.
- Peters, B. G., & Pierre, J. (2001). Developments in intergovernmental relations: towards multi-level governance. *Policy & Politics*, 29(2), 131-135. <https://doi.org/10.1332/0305573012501251>
- Peterson, P. E. (1981). *City limits*. University of Chicago Press.
- Pierson, P. (2000). Increasing Returns, Path Dependence, and the Study of Politics. *American Political Science Review*, 94(2), 251-267. <https://doi.org/10.2307/2586011>
- Pressman, J. L., & Wildavsky, A. (1984 [1973]). *Implementation : how great expectations in Washington are dashed in Oakland; or, Why it's amazing that federal programs work at all : this being a saga of the economic development administration* (3. ed.). University of California Press.

- Pülzl, H., & Treib, O. (2007). Implementing Public Policy. In F. Fischer & G. J. Miller (Eds.), *Handbook of Public Policy Analysis: Theory, Politics, and Methods* (Vol. 125). Taylor & Francis Group.
- Ragin, C. C. (1987). *The comparative method : moving beyond qualitative and quantitative strategies*. University of California Press.
- Regeringen. (2010). *Ghettoen tilbage til samfundet - Et opgør med parallelsamfund i Danmark*. https://www.regeringen.dk/media/1215/ghettoen_tilbage_til_samfundet.pdf
- Regeringen. (2014). *Regeringens forhandlingsudspil til Boligaftale 2014*. https://legacy.altinget.dk/misc/regeringens_udspil_til_boligaftale_2014_endelig.pdf
- Regeringen. (2018). *Èt Danmark uden parallelsamfund - Ingen ghettoer i 2030*. <https://www.regeringen.dk/aktuelt/tidligere-publikationer/%c3%a9t-danmark-uden-parallelsamfund/>
- Rhodes, R. A. W. (1980). Analysing Intergovernmental Relations. *European Journal of Political Research*, 8(3), 289-322. <https://doi.org/10.1111/j.1475-6765.1980.tb00575.x>
- Rhodes, R. A. W. (1981). *Control and power in central-local government relations*. Gower.
- Rhodes, R. A. W. (1997). *Understanding governance : policy networks, governance, reflexivity and accountability*. Open University Press.
- Sabatier, P. A. (1992). Book Reviews. *The American Review of Public Administration*, 22(1), 67-69. <https://doi.org/10.1177/027507409202200106>
- Sager, F., & Gofen, A. (2022). The polity of implementation: Organizational and institutional arrangements in policy implementation. *Governance*, 35(2), 347-364. <https://doi.org/10.1111/gove.12677>
- Schmeida, M., & McNeal, R. (2013). Children's Mental-Health Language Access Laws: State Factors Influence Policy Adoption. *Administration and Policy in Mental Health and Mental Health Services Research*, 40(5), 364-370. <https://doi.org/10.1007/s10488-012-0428-6>
- Schwartz-Shea, P., & Yanow, D. (2012). *Interpretive research design : concepts and processes* (1st edition ed.). Routledge. <https://doi.org/10.4324/9780203854907>
- Sellers, J. M. (2005). Re-Placing the Nation. *Urban Affairs Review*, 40(4), 419-445. <https://doi.org/10.1177/1078087404272673>
- Stoker, G. (1995). INTERGOVERNMENTAL RELATIONS. *Public Administration*, 73(1), 101-122. <https://doi.org/10.1111/j.1467-9299.1995.tb00819.x>
- Stoker, R. P. (1991). *Reluctant partners : implementing federal policy*. Univ. of Pittsburgh P.
- Swedberg, R. (2011). Theorizing in sociology and social science: turning to the context of discovery. *Theory and Society*, 41(1), 1-40. <https://doi.org/10.1007/s11186-011-9161-5>
- Swedberg, R. (2017). Theorizing in Sociological Research: A New Perspective, a New Departure? *Annual Review of Sociology*, 43(1), 189-206. <https://doi.org/10.1146/annurev-soc-060116-053604>
- Thomann, E., & Sager, F. (2017). Moving beyond legal compliance: innovative approaches to EU multilevel implementation. *Journal of European public policy*, 24(9), 1253-1268. <https://doi.org/10.1080/13501763.2017.1314541>
- Thomann, E., & Zhelyazkova, A. (2017). Moving beyond (non-)compliance: the customization of European Union policies in 27 countries. *Journal of European public policy*, 24(9), 1269-1288. <https://doi.org/10.1080/13501763.2017.1314536>
- Tiebout, C. M. (1956). A Pure Theory of Local Expenditures. *The Journal of political economy*, 64(5), 416-424. <https://doi.org/10.1086/257839>
- Trafik-, B.-o. B. (2019). Præsentation: Status for udviklingsplanerne. In *Boligdag 2019*. Arranged by Aalborg University 6th of November 2019.
- Winter, S. (1998). *Implementering og effektivitet* (2. opl. ed.). Systime.
- Winter, S. C., & Nielsen, V. L. (2008). *Implementering af politik* (1. udgave. ed.). Academica.
- Yin, R. K. (1994). *Case study research : design and methods* (2. ed.). Sage.

Zhelyazkova, A., & Thomann, E. (2022). 'I did it my way': customisation and practical compliance with EU policies. *Journal of European public policy*, 29(3), 427-447. <https://doi.org/10.1080/13501763.2020.1859599>