# Regional governance and community-led local development: miles apart?

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## Abstract

*All across Central and Eastern Europe (CEE), local governments struggle to maintain their autonomy. Twenty years after regaining their independence, they have become a central foundation of modern public administration and are part and parcel of national government's programs and ambitions. While this has enhanced their share in public expenditure, it has also led to an increased dependence on external finance, be it national, regional or European.

The current fiscal crisis has induced an ongoing round of austerity measures and budget-cuts, and it seems local government are paying the price. Their budgets are affected to a stronger degree than those of other administrations. Regional cooperation and regional governance seem to be the only way forward to maintain service delivery, cut operating costs and safeguard local self-government without having to resort to massive outsourcing. Territorial consolidation has become a buzzword all across Central Europe.

The question this paper tries to answer is how this type of efficiency-driven regional governance relates to (local) self-government. Recent public debates in Western and Central European countries seem to suggest new regional governance seriously threatens the autonomy of local self-government and is directly at odds with the essence of democratic governance that was reestablished throughout CEE some twenty years ago. Based on an analysis of local/regional governance debates in Europe, the paper offers a theoretical framework that relates the Neo-Weberian state model of local government with the theory of territorial consolidation.*

## 1 Territorial consolidation: the drive for the perfect match

Local governance is of increasing importance to the European nation states[[2]](#footnote-2). Across the continent, more central government taxes are spent locally. At the same time, central governments increase their grip: the increase in local spending does not correspond to an increase in local autonomy[[3]](#footnote-3). To the contrary: comparative studies indicate that local governments are ever more dependent on national legislation[[4]](#footnote-4). More and more, local governance is integrated into the national state administrative network, to such an extent that the two can hardly be distinguished. The penetration of the national state seems to prevail across the board.

The drive for consolidation and congruence leads to important questions. The centralization/decentralization debate (does deconcentration actually contribute to decentralization or does it constitute another wave of centralization?) seems to be concluded.

At the same time, observers discuss the dissolution of the national state into more or less loosely federated city-states[[5]](#footnote-5). Global diversification and simultaneously localization lead to debates on ‘glocalization’ and the end of the state. Frontiers have become obsolete, capital moves around without borders, and time is no longer an issue. Regional diversification can take on strong traits. Prospering well to do cities, integrated in the global fabric, may be next door to neighboring cities that have lost out on the global completion. Thus, on the axis Paris-Bruxelles for instance, economic segregation has left a strong imprint on the region, laying waste to some (Charleroi) while promoting others (Lille). More than ever, territorial cohesion has become an issue[[6]](#footnote-6). In 2012, concepts like ‘congruence’ and ‘territorial consolidation’ dominate many of the debates on regional integration in Europe. Reinforcing internal coherence, both administratively and democratically, is on the top of the political agenda in the Netherlands, France, Belgium, Poland, the United Kingdom – and many more.

Somehow, the region has retaken its position as center-stage. After years of national integration (‘60ies to ‘80ies) and urban renaissance (‘90ies), regional governance dominates the European administrative debate[[7]](#footnote-7). Subsuming national integration and local alignment, regions appear to represent the mid-range, best of both worlds practical orientation on public administration that dominates European Public Administration. In many Neo-Weberian states, the regional level has been the scene of huge institutional innovation, such as Poland (the introduction of the regional district, 2002) and the German Länder (territorial communal and regional reforms, 2002-2008). Regional consolidation allows for enhanced service provision and increased efficiency. It prepares non-national (self) administration for the execution of national government tasks while improving local and regional accountability to the national governments. While local budgets double, local autonomy dwindles, up to a level where locally elected councils hardly have the possibility to amend local government budgets, because such large parts of that budget have been subcontracted, and are subject to national government control.

The question which this paper addresses is:

***How does regionalization affect local (self)governance?***

## 2 Regionalization and self-government: opposites attract?

Although global integration (centralization) and local accountability (decentralization) appear to be at odds, there are indications that the two may be two sides of the same coin. The one variable influencing the two is the demise of formal local democracy and the advent of urban governance – informal, networked, oriented on safeguards and the capacity to replicate rather than control, transcending the old region-city divide, fostering congruence. In this post-modernist version of local governance, it is not nationally oriented public administration that takes the fore, but civil society. Urban governance networks resemble fungus rhizome: multiconnected, heterogeneous, self-generating, holographic, borderless. Civil society organizations occupy the central nodes and the connections within the system. In such systems, local governments main task is to stimulate resilience. Social capital is the common ratio.

Following the fungus paradigm, it makes perfect sense to integrate and simultaneously diversify. Integration reinforces the ability of the entire system to make more efficient and effective use of scarce resources. Diversification stimulates the ability of the fungus to adapt, amend and improve whatever the conditions may be. The question therefore is: does the same apply to regionalization within the Neo-Weberian state? Does regional consolidation lead to democratic voids, or mend them? Does European multi-level governance enhance local autonomy or limit it? To answer these questions, I first review the regional dimension within the Neo-Weberian concept of the state and then discuss the concept of Community-led Local Development (CLLD). Next, I try to operationalize the two in a study of Potsdam in Brandenburg territorial reform and citizen participation between 2003 and 2009. On the basis of this litmus test, I try to answer the research question.

## 3 The Neo Weberian State: the regional dimension

The empirical evidence on regionalization and local governance is mixed. Most literature in comparative administration focuses on public sector reform[[8]](#footnote-8) or local government[[9]](#footnote-9). Intergovernmental relations and multi-level governance do constitute a critical element of most studies[[10]](#footnote-10), but almost exclusively focus on intergovernmental relations between national states and the disappearance of the national state. For countries in CEE recently recreating their independence, with a positivist statehood tradition, three characteristics stand out in the discourse on subnational governance: the machinery of government, power relationships in administrative systems and instrumental rationality. These three are constitutive of the ‘Neo Weberian state’ ideal type[[11]](#footnote-11).

The Neo-Weberian discourse on regional and local governance has been particularly fruitful in the analysis of territorial reform, public-private partnerships, the study of political elites, political-administrative relations, public service delivery and democratic self-governance. It takes the law as its primal point of reference, presumes a double bind between state and society and focuses on the translation of law into state capabilities and subsequent control and accountability procedures.

It does not, however, problematize the diminishing grip of the national state over local life, due to globalization, integration, the loss of the monopoly of the state on expertise through informatization. Digital era governance destroys many of our traditional administrative institutions. It constitutes a transition to a “…more genuinely integrated, agile, and holistic government, whose organizational operations are visible in detail both to the personnel operating in the fewer, broader public agencies and to citizens and civil society organizations”[[12]](#footnote-12).

In such systems, I contend, the interaction between the state and its citizens can best be studied at meso-level: the regional level. With regionalization sweeping CEE, I focus on the relation between regionalization and local government. With Swianiewicz[[13]](#footnote-13) I posit that “if the focus is on the “natural” perspective of local government being an emanation of the local community, (as in Southern Europe), then there is a case to defend territorial fragmentation”. It is on the regional level that changes in the government machine are “closely meshed with and run strictly in parallel with increases in citizens’ autonomous capabilities for solving social problems”, to paraphrase Dunleavy et.al[[14]](#footnote-14) From such a perspective, analyses of regional governance do not only focus on the intended (instrumental) effects of regional governance that have been so central in the debate about the regional level and public reform in European governance since the 1990s[[15]](#footnote-15).

## 4 Community led development

This paper adds a second, bottom up perspective: that of local communities and citizens trying to organize for safety and security in the face of globalization, multi-level governance and the administrative instability these lead to in terms of the effectiveness of state-led, top-down reform. This perspective might account for the apparent ease with which, after so many years of stagnation in decentralization, deconcentration and regionalization, local communities, cities, municipalities have adopted the call for regional (often voluntary) cooperation and even amalgamation. This is more than an effort to better gear up for the integration into the European Union and the assumption of European funds (as is often argued form the more peripheral regions of Europe[[16]](#footnote-16)). It is an effort to cope with the crippling effects of territorial and political fragmentation and the effects it had on the construction of a civil society, cooperation between the national and local level, public-private partnerships and the relations between urban centers and their periphery[[17]](#footnote-17) .

Despite the apparent friction between the economy of scales that favor efficient and effective government and the direct involvement of citizens in their administration, some analysts suggest that “in some cases amalgamation (of municipalities FJ) may also have a positive impact on local democracy, or at least that potential positive economic effects of the reform, would not be accompanied by negative social and political side-effects”[[18]](#footnote-18).

What does seem to matter is the involvement of national states in the sphere of welfare. The more involved states become, the more elaborate local and regional schemes are, and (subsequently) the more local organizing for safety on a local level becomes[[19]](#footnote-19) Scarcity of funds and the need to manage social risks exert a strong effect on the establishment and proliferation of regional arrangements between local governments. Coordination relies on strong, active governments alongside other institutions at the local level to carry out agendas for training, labor markets and innovation[[20]](#footnote-20). As such, the current economic crisis combined with a stronger state penetration of society could be hypothesized to generate interlocal and regional cooperation and amalgamation. Popularly put: communes and municipalities can not stand the risk to have their budgets inflated while simultaneously being put under increased surveillance.

Here Community Led Local Development (CLLD) comes in. Community led development is the European Commission’s response to demographic change, the inability of public authorities to draw in local and social actors into European programs and the need to construct truly regional public-social-private partnerships in order to offer a financial and organizational framework for reacting to European challenges[[21]](#footnote-21). The Commission identifies the need to bring grass-roots organizations at the table in order to achieve ownership of Community funded projects and develop financial arrangements that guarantee projects, once they are formally ended, while be sustained and maintained. CLLD extends the application of the “LEADER approach”, hitherto limited to the current rural development programs. In the past few years, local (non-public) actors have complained about too much interference from public administrations, too little room for local decision making, too narrow scope of eligible projects and activities, and dwindling voluntary engagement of citizens. The Dutch “Other government” program responded to the same challenges that programs such as “Big Government” (United Kingdom), “the Modernization” (France”) or the “Proficient State” (Poland) were designed for. In all of these programs, government sought to ally themselves with social alliances and subsequently step back.

These programs could constitute a new phase of ever widening application of subsidiarity coupled to the administrative penetration of the state into society[[22]](#footnote-22). They might, on the other hand, hail the advent of truly new forms democratic participation with participatory budgeting and *Solidarkommune* as prime examples[[23]](#footnote-23). Whatever their meaning, what is relevant at this point is that the regional dimension has been brought back to the fore. Often, local communities are too small in scale to provide a basis for alliances in all relevant dimensions. More often than not, the social-economic dimensions in the way citizens lead their lives do not neatly correspond with administrative borders. Diversification and differentiation further increase complexity. Increasingly, local actors act on and turn to regional arenas to safeguard their future and escape the overburdened formal political-apparatuses[[24]](#footnote-24).

## 5 Reforming local and regional government in Brandenburg (Germany)[[25]](#footnote-25)

What does this do the trade-off we signaled earlier, between efficiency/effectiveness and formal democratic governance? Do local governments truly achieve regional cooperation and overcome their differences? This paper does not constitute the place or time to answer such questions. What I can do, is offer a short case, of the Territorial Reforms in Brandenburg (Germany), as a first test for the hypotheses posited in this paper.

Local government in Brandenburg was a product of the German ‘*Wende’*: the fall of the Berlin Wall, the demise of the German Democratic Republic and the process of German reunification. Local government was perceived as the ultimate opposite of Democratic centralism, and the perfect antidote to any antidemocratic sentiment ever originating again. In an effort to establish true local democracy, local government was to be as close to the citizens as possible.

The establishment of local democracy coincided with that other phenomenon so characteristic of the new Bundesländer: the adoption of ready West-German administrative regional arrangements to cope with the possible negative by effects of diversification. Not before long, tensions between small local governments and the obligatory regional districts ran high. In an effort to solve this tension, a sweeping Local government reform was implemented in 1999 to upgrade and simultaneously merge Brandenburg’s municipalities, in such a way that they would have the adequate scale and professionalism to implement and uphold all of the devolved tasks.

‘One size fits all’ solutions never hold, and this one did not either. Not before long, municipalities started complaining. Demographic change affected the population’s size and thereby municipal finances, in such a way that the existing effort to maintain a unified administrative scheme did no longer hold. Some of the poorer cities who were seeing their population drastically reduced pleaded for a second phase of amalgamation. Their pleas were contrasted with more rural local governments opposing a further up scaling because of the probable distances to centrally located services like fire brigades, medical surgeries etc. Richer cities, such as Potsdam, were opposed too, out of fear of having to settle the debt of poorer neighbors in the process of a merger.

Central in this debate about the scale of local government was the concern over the relation between citizens and their local governments. Reunification had brought genuine local government, but it had not resulted in an increase of citizenship in terms of active participation. The bickering between neighboring communities had only been intensified, while the centralist strategy of enforcing cooperation resulted into bitter argument over who was worst off, and allowed no leeway for locally developed arrangements that fit local circumstances.

Now that the first phase of reunification was over and the funds for further territorial started to dry up, many municipalities feared they would not be able to maintain the essential minimum of services that citizens require. The first phase of reunification had brought much investment in local and regional infrastructure, but restructuring towns, transforming existing urban areas and exploiting extraordinary sites like castles is an entirely different matter. The Treuhand succeeded in privatizing many of these objects and businesses, but it seldom had an eye for the durability of the exploitation. More often than often, within a few years after privatization, businesses would file for bankruptcy and the community would still have to pay the price. Attracting West-German capital sure helped, but had its limits. Many smaller communities discovered that decisions about profits and investments were still made out West. Only by involving local capital and local people could a sustainable development be guaranteed.

Financial scarcity, ever-growing complexity and a growing rift between citizens and authorities made a number of municipalities within Berlin like Berlin-Lichtenberg experiment with *Bürgerkommune* (Citizen Municipalities)[[26]](#footnote-26). Replicating Porto Alegre (Brasil) and other participatory initiatives closer to home, many East-Berlin municipalities believed that the huge social tasks of restructuring could only be fulfilled if the inhabitants were actively involved. Part of the reasons for this interest in involving participants was the lack of trust in and interest for formal democracy.

Ten years of efficiency reform had greatly modernized German municipalities, but also resulted in an increasing rift between citizens and their authorities[[27]](#footnote-27).The efficiency-driven New Steering Model had not delivered the results that had been promised. Municipalities that had adopted it, set strategic goals, implemented monitoring systems and contract-relations between the city council, the city government and the city administration. This contractualization did not produce the gains once thought in stock[[28]](#footnote-28).

Many municipalities therefore opted for the other road to modernization: solidary local government *(Solidargemeinde*) and civic municipalities (*Bürgerkommunen)*. Many of these experiments initially focused on the budgetary processes, in an effort to economize. The inhabitants would be given some say over the way the municipal budget would be spent in their municipality. This phenomenon is not uncommon in other countries in Europe. What is special about the *Bürgerkommune*, however, is the extent of citizen control (in terms of part of the city budget) and the rights that the *Bürgerkommune* has.

The *Bürgerkommunen* were especially promoted by parties identifying themselves with the working class tradition of East-Germany. Being rooted in the city suburbs, with strong membership among worker-associations, such parties could count on their supporters to come and participate in participatory decision-making. For the same reason, more conservative parties harbored suspicion and reticence, favoring a bolstering of formal indirect democracy by the creation of ‘strong municipalities’ instead – that is, bigger municipalities, strong enough to carry out the whole specter of devolved programs and at the same time maintain a direct line to local constituents.

Thus, direct and indirect democracy clashed, all over Eastern-Germany. The clashes were especially bitter in areas where worker-oriented parties had their strongholds, such as Brandenburg and Sachsen-Anhalt. One of those cities was Potsdam. Among the cities in Brandenburg, Potsdam had always held a rather privileged position, with many of Berlin’s more wealthy inhabitants (and companies) choosing to live (and pay their taxes) in Potsdam instead of the big city itself. Potsdam was rather fearful of the efforts of nearby neighbors to achieve further amalgamation, fearing it would have to settle the negative balances of its neighbors.

Potsdam itself was in a relatively safe position. Because of demographic change, it would gain in importance and grow with some 15.000 inhabitants until 20.000 however. Nonetheless, it saw the negative effects coming close. Many of its regional neighbors saw themselves sliding off into the abyss at an amazing speed. Potsdam itself saw many of the signs in terms of the labor market, city development, social and technological infrastructure, cultural venues and city finances. The average age of its inhabitants was on the rise; urban growth would be in pensioners, not in working people. The six city-districts within Potsdam followed very different tracts: some were shrinking, other still growing. In terms of average age, relation to the labor market and origin, diversification loomed large. How to battle such differentiation?

In 2006, Potsdam (being the regional capital) decided to act decisively on two fronts: to strengthen regional coordination and reinforce local democracy by implementing the *Bürgerkommune*. Diversification and flexibility were key-words. By combining the regionalization of services with the leeway for each of the municipalities to strike its own balance, Potsdam broke explicitly with the Grand-Reform debate that was being waged on the Landes-level of Brandenburg.[[29]](#endnote-1) Isolation was not considered an option. If the surrounding Havelland depopulates, Potsdam is affected too.

In 2005, Potsdam adopted its guideline to participatory city government. The existing participatory arrangements were integrated, enlarged, and supplemented with a participatory city budget (*Bürgerhaushalt*). When the Socialdemocrat and Left parties gained the majority in the Brandenburg parliament in 2009, they started a process of adapting legislative review to promote participatory government. Passive information obligations were replaced by information rights and the duty to actively inform. In legislation on the financial relations between Land and municipality, monitoring and reporting-procedures were adapted in such a way that municipalities could allow their citizens more leeway.

It is still too early to evaluate the results of the *Bürgerkommune* in Potsdam. It is clear that the experiment is working in massing social capital and engaging social action in weaker parts of the city. In a suburb like Drewitz, citizens have used the new platform to engage in a strategic planning process for their own neighborhoods. If anything, therefore, participatory city government reinforces diversification. The city council of Brandenburg is trying to redevelop its position. It is clear to everyone that direct democracy directly affects the importance of indirect, representative democracy: its domain is limited, local accountability processes are reinforced. Equally clear is that the city council continues to perform the central and crucial function of safeguarding a harmonious and integrated development of the entire city. Transaction costs are huge, the participation and choice of topics by *Bürgerkommune* is selective and prone to capture. At the end of a direct citizen’s initiative, more often than not, the City council is needed to end a debate, come to conclusions, formulate a decision, adopt it and order its implementation. Thus, direct and indirect democracy go hand in hand.

An obstacle to increasing local accountability is the amalgamation between the public and private sector. In an effort to respond to the appeal for an “active” local government, many municipalities (Potsdam included) have engaged themselves in public-private partnerships and have founded private-law companies in public ownership to further its interests, often in close cooperation with other public regional parties. These hybrid public-private organizations formally operate outside of the public sphere, but the risks entailed do end up in the small print of the municipal budget. As long as local and regional developments are harmonious and a reflection of earlier assumptions, there is no problem, but that has not been the case.

Since the last all-encompassing administrative reform, demographic changes have set in on a grand scale. The number of inhabitants dwindles, to such an extent that fifteen newly created municipalities already operate below the minimal threshold of inhabitants, and that number of fifteen will only increase. Since 2008, Brandenburg goes through one of its worst economic depressions that is greatly affecting the administrative and financial capabilities of its local governments. The financial risks of entrepreneurial government have become manifest, and many smaller municipalities operate within the financial danger zone.

Lower costs and increasing investment is paramount, but how? Amalgamation of municipalities has not lived up to its promises: costs have not decreased, economies of scale have not materialized, and an improved administrative capacity can be assumed but not proven. The enforced intermunicipal cooperation does not help, but hinder the genesis of arrangements including local stakeholders that work. Diversification on the local and regional level makes it impossible to apply general administrative schemes. Wollman speaks of a “symbiotic” institutional arrangement of small-size municipalities plus a layer of inter-communal bodies, established by the Land governments through “carrot and stick” strategy, in the last resort via compelling legislation”[[30]](#footnote-29).

The debate over how to reform the reform is intense. Many favor the establishment of territorially enlarged “integrated” municipalities to allow for municipalities that are able to fulfill all of their functions, including commissioned tasks from the Land. They point to similar trends in the Netherlands and Denmark, where only municipalities with a number of inhabitants of 30.000 to 40.000 are deemed viable. Others point to the fear of over sizing the municipality. They are backed by a 2011 ruling of the Constitutional Court of Mecklenburg-Vorpommern, which a further amalgamation of municipalities jeopardizes the appropriate functioning of local democracy in a politically and constitutionally unacceptable manner.

## 6 Conclusions

How does regionalization affect local governance? The theoretical debate and the Potsdam case show a couple of provisional conclusions that would be interesting to take up in a more structurally design research.

First and foremost, the two seem to be two sides of the same coin. One variable in the background is strongly connected to both of them: the ‘discomfiture’ of formal democratic institutions and administrative arrangements that are so constitutive of the Neo-Weberian State. The Neo-Weberian State is, according to Guy Peters[[31]](#footnote-30) a hybrid between the managerial and hollowed out state that had been created during the reform era. It is geared towards improving efficiency as well as probity. Under conditions of globalization, fiscal scarcity and irreversible structural societal changes, however, these are no longer the prime values that citizens expect their governments to maximize. The public service provision that was so central from 1970s throughout 1990s has given way to a state paradigm that much resembles what I call the ‘Reconstructivist State’ of the 1950s whose prime task it was to provide a new moral basis for the relation between state and society, renegotiate the relation between state and the global community and adapt to fast technological innovations while simultaneously alleviating the dire needs that World War II had created. I do not mean to say that social security, pensions, housing etc. have become unimportant; they only thing I do contend is that citizens are fully aware that the state can no longer provide let alone guarantee these essential needs on its own. It is therefore that they look to other way to secure their lives. To paraphrase Esping Andersen[[32]](#footnote-31): now that the state has shown its limitations and the market its unreliability, citizens are turning to communities as a source of refuge, be it traditional ones (families, neighborhoods, villages) or E-communities.

Crucial cornerstones of the NWS are becoming obsolete[[33]](#footnote-32). Globalization and informatization render officially ordered jurisdiction, borders and frontiers obsolete. Formal hierarchical structures give way to horizontally structured fields that are at least partly dominated by private, not public law. Functional specialization is replaced by versatility and connectedness. Rule controlled behavior, geared towards effectiveness and efficiency, is replaced by trial and error and the increase of redundancy to maintain robustness and resilience. Not written documents but e-data in the cloud, owned by no one, determine what is true and what not. Framing and trust are the basis for effective administration, not the application of written. Last but not least, there no longer are general applicable rules **general rules** which are more or less stable, more or less exhaustive, and which can be learned.

Connectivity is the new buzz word, and in this domain, the region has much to say for it. Regions are the new nexuses in social, financial, technological and political networks. It is to regions that citizens look for safeguarding their future. Citizens, companies, social actors constitute regional networks that provide shelter and security. From safe grids (power), urban redevelopment, job security to urban mining (resources) – more and more, all primal resources citizens need are provided and produced on the regional level.

The effects that this development has on formal political institutions is a complex one. Local government does not disappear, but it is subsumed in and constitutive of this regionalization. Gone seems to be the time of grand scale amalgamation, because it rested on the premises that a ‘one-size-fits-all’ arrangement could be found for each possible social need. Scaling has become an important topic for most administration, and the buzz word is ‘scale sensitive’. Through scaling, local communities connect with global issues and chances while maintaining robustness and resilience[[34]](#footnote-33). Thus, regionalization might reinforce local self-governance.

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2. Sellers 2010 [↑](#footnote-ref-2)
3. Blöchliger, King, 2006 [↑](#footnote-ref-3)
4. Bach et.al 2009: 1 [↑](#footnote-ref-4)
5. Khanna 2011 [↑](#footnote-ref-5)
6. Swianiewicz 2010 [↑](#footnote-ref-6)
7. Hausner 2001 [↑](#footnote-ref-7)
8. For instance Guy Peters 2006; Pollitt and Bouckaert 2011 [↑](#footnote-ref-8)
9. E.g. Denters and Rose 2005 [↑](#footnote-ref-9)
10. Such as Goldsmith, in: Denters and Rose, 2005: 228-245 [↑](#footnote-ref-10)
11. See for its description and critique Lynn 2008 [↑](#footnote-ref-11)
12. Dunleavy et.al. 2006: 489 [↑](#footnote-ref-12)
13. Swianiewicz 2010: 7 [↑](#footnote-ref-13)
14. Dunleavy et.al. 2006: 488-489 [↑](#footnote-ref-14)
15. Geelhoed 2009 [↑](#footnote-ref-15)
16. E.g. Bafoil 2010 [↑](#footnote-ref-16)
17. Swianiewicz 2010: 1-29 [↑](#footnote-ref-17)
18. Swianiewicz 2010: 17. Furthermore Blom-Hansen et.al. 2011 [↑](#footnote-ref-18)
19. Sellers 2009 [↑](#footnote-ref-19)
20. Pierre (ed.) 2000 [↑](#footnote-ref-20)
21. See for instance Kuepper 2010 [↑](#footnote-ref-21)
22. Trommel 2010 [↑](#footnote-ref-22)
23. Bevir, 2012; Steinbach 2010 [↑](#footnote-ref-23)
24. Herzberg 2008 [↑](#footnote-ref-24)
25. This case was first presented on a conference on Proficient Administration in Wroclaw, Poland, on April 1-2, 2011. [↑](#footnote-ref-25)
26. Steinbach 2010 [↑](#footnote-ref-26)
27. Bogumil, Grohs and Kuhlmann 2006 [↑](#footnote-ref-27)
28. Bogumil and Holtkamp 2007 [↑](#footnote-ref-28)
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