

CTLIP Governance and Policy for Sustainability Report: Stakeholder Analysis¹

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Introduction

In a context of rich biodiversity and extreme inequalities, the City of Cape Town² is tasked with providing services to all its inhabitants – from seeking appropriate and equitable land for houses for the poor and providing bulk infrastructure to those who need it, while at the same time, developing climate change action plans and the city’s growth strategy for forthcoming years. Sustainable urban development has been embraced as a planning objective to address these diverse needs, including redressing past injustices and building a ‘city that works for all’,³ and harnessing the natural environment to appeal to tourists and investors – while simultaneously planning for future growth and development that is sensitive to the city’s assets but that takes into account the requirements of the city’s growing numbers.

The intention of Mistra Urban Futures’ Governance and Policy for Sustainability (GAPS) programme is to understand how sustainable urban development has been conceptualised and understood in different contexts in relation to the pressures of globalisation, inequalities, resource constraints and climate change, and to illustrate the role of knowledges in shaping different responses to the challenges of sustainable urban development. As part of a process of identifying potential points of leverage for achieving policy outcomes that support sustainable development, phase two of this project seeks to examine the factors within local government that enable and constrain decision-making for sustainable urban development. It is important to acknowledge that many decisions made by politicians and city officials are directly related to budget and legal compliance, rather than the objective of sustainable urban development. The balancing of budgets and clean audits are of vital importance. Nonetheless, despite the overarching need for compliance in these respects, other factors have effects on how sustainable urban development is conceptualised, understood and implemented in the City. This report examines these perceptions.

The first section of this report explores the methodology used to deal with complicated issues of decision-making in local government processes. Here, we focus on co-production as a frame for

¹ This is an abbreviated version of a report entitled CTLIP Governance and Policy for Sustainability Report: Stakeholder Analysis, by the same authors, submitted to the GAPS directors on 5th December 2013.

² In this report, and indeed in many government reports, ‘the City’ refers to the local government the City of Cape Town, while ‘the city’ refers to the geographical extent that the City of Cape Town governs.

³ This is adapted from the City’s slogan, ‘This City Works for You’.

obtaining information to inform our understanding of forces shaping decision-making on issues that influence sustainability in the City of Cape Town. Decision-making was explored in five City strategies (the City Development Strategy and the Climate Adaptation Plans of Action, the Economic Growth Strategy, the Spatial Development Framework, the Energy and Climate Action Plan, and the Integrated Metropolitan Environmental Policy review) with a direct bearing on sustainable development. The second section explores the overarching themes that emerged from this research into decision-making in the City, including the importance of understanding context in exploring the decision-making terrain in the City; understanding the ways in which problems are framed as a result of these contexts; the compromises that occur in making decisions that are in keeping with the City's multiple mandates and responsibilities; the need for spaces for interaction between City officials, politicians and stakeholders; the different knowledges that inform policy-making in the City; the politics of decision-making and the need for increasing visibility of decision-making and innovation in the City.

Methodology

There is a growing need to understand the decision-making terrain in the City, or at least to better understand the contexts in which decisions are made. This report begins the process of understanding, through the exploration of five key policies or strategies, the politics of decision-making at the local government scale.

The Cape Town Local Interaction Platform (CTLIP) is designed around a Knowledge Transfer Programme, where the African Centre for Cities (ACC) and the City of Cape Town have partnered in order to explore new sustainable urban transitions. The aim of the Knowledge Transfer Programme (KTP) is to make decision-making processes more legible and hence defensible within the City of Cape Town, in order to render policy outcomes of these more sustainable. CTLIP's KTP, particularly the embedded researchers' project, is crucial to gathering such information. The KTP uses a methodology of knowledge co-production, building on the notion of 'Mode 2 knowledge' (Gibbons et al, 1994). Mode 2 knowledge is characterised by knowledge produced in the context of application, the transdisciplinary nature of this production, the heterogeneity of skills and organisational diversity, as well as social accountability and reflexivity. The structure of the KTP is twofold: firstly, it sees four PhD researchers with research interests in sustainable urban challenges 'embedded' at the City of Cape Town. For seven months of the year (over a three year period), they

work as City officials⁴ on policy areas that complement Mistra Urban Futures' green, fair and dense themes, contributing content relevant knowledge, developing strategic partnerships with stakeholders both within and outside local government, and documenting the process of policy development, making urban development policy and decision making processes more legible. For the researchers, 'working in an application context creates pressures to draw upon a diverse array of knowledge resources and to configure them according to the problem in hand' (Gibbons et al, 1994: 27). Secondly, City officials with interesting cases relating to their work in urban sustainability policy development are invited to apply to be considered for the City Officials Exchange Programme, which offers successful candidates up to two months sabbatical away from their City work to take up a writing fellowship at the University of Cape Town, where they partner with academic supervisors to write up their accounts for academic publication.

The research was conducted through the use of 'filters', where interview questions were sorted into themes. This allowed for iterative engagements, rather than interviews, between researchers and city officials, and thus built on the trust that has been established between the Mistra Urban Futures programme and the City, as well as emphasising the co-productive nature of this research. Speaking to key themes with information gathered from a variety of sources over a period of time, allows for a more accurate representation of the City's functioning. These filters included:

- Perceptions – what do officials believe to be the cause of gaps between policy and practice?
- Challenges – what hinders decision making, what hinders policy implementation?
- Knowledge – what types of knowledge inform policy?
- Values – data or value-driven approach to driving decision-making?
- Inclusion – who is included in decision-making? Who is not included? Why?
- Incentives – do any incentives exist for officials/politicians in order to gain traction for certain policies?

Rationale

For the purposes of this report, we have focused on the trajectory of five policies that are either in development or have recently been implemented, including the Economic Growth Strategy (EGS), City Development Strategy (CDS) and Climate Adaptation Plans of Action (CAPAs), the Energy and Climate Action Plan (ECAP), the Spatial Development Framework (SDF) and the Integrated Metropolitan Environmental Policy (IMEP) Review. These five policy initiatives in the City of Cape Town have been selected because of their relevance to the Mistra Urban Futures focus areas of fair,

⁴ The insider/outsider aspect of this embedded research is not without methodological and ethical challenges. Although beyond the scope of this report, questions of positionality, fair representation, and credibility are frequently considered by the researchers.

green and dense. In addition, they are directly related to the embedded researchers' work in the City of Cape Town, as well as their PhDs. They have also been chosen because they have relevance beyond the Environmental Resource Management (ERM) department, the pioneers of sustainable development thinking and practice in the City. These five policies are important to analyse as they reflect a wider understanding of the challenges to sustainable urban development pathways. The breadth of the interaction with these policies also suggests that our findings, below, can be related to a number of departments and policy processes beyond the ERM department. This increase in scope aligns with the prior objective of the City to mainstream sustainable development responses throughout City activities. The following section details the overarching themes that capture what it means to govern at the City scale in Cape Town, with particular focus on urban sustainable development.

Findings

This research has indicated that there was a consistency in factors shaping decision-making across the five policies and strategies and that these findings are not limited to just one strategy and its supporting departments. Key themes that arose from research include: context, framing of issues, compromise in decision-making, knowledge, spaces for interaction, the politics of decision-making and visibility.

Context

The city of Cape Town is highly unequal. There is a poor majority and a wealthy minority (resulting in differing needs and expectations), with skewed settlement densities and urban sprawl as one travels away from the city centre and the leafy green areas around the foot of Table Mountain. These are legacies of apartheid's planning policies.

In South Africa more generally, but pertinent for Cape Town, there are growing levels of urbanisation, both through natural growth as well as through migration to the cities (internally from within South Africa as well as regional migration). Growing numbers of poor people living in the city (or the urbanisation of poverty, see Parnell and Lilled, 2013) has resulted in increasing informality. All of this is further challenged by the changing and expanding mandate of local governments in South Africa in relatively short time frames. There is now a need not only to deal with pressing issues that are typically considered to be 'basic' service delivery requirements (such as water and sanitation, electricity and housing), a need that is explicitly entrenched in the Bill of Rights, chapter 2 of the South African Constitution, as well as social needs (education, healthcare, transport), equally,

there is a need for attention on equally important, but less 'prioritisable' agendas (for example, climate change). These emerging rights are not explicitly addressed in the Constitution, with Chapter 24 on the environment being open to wider interpretations. These 'secondary', emerging needs have effects on the basic service requirements of the population, as well as on the population itself (often affecting the poor the most), yet are often delayed as they are seen to be less urgent than other requirements.

Government at all spheres has had numerous new and challenging deliverables over the last 19 years in the post-apartheid context (see the *National Development Plan*, 2012). Also important in terms of context, the City of Cape Town has changed immensely over the post-apartheid years, structurally as well as in terms of the changes in mandate and role. It has been less than 20 years since the demise of the apartheid regime and the associated significant shifts in local government's roles and configuration. In its current formulation, the City of Cape Town metropolitan municipality has been in existence for 12 years. Prior to democracy, Cape Town had 39 local authorities and 19 administrations. Because these were racially based entities with limited capacities, these were condensed in 1996 into seven municipalities (City of Cape Town Council Overview 2011: 4). These municipalities merged into one in 2000 when the City of Cape Town became known as the 'unicity', the metropolitan municipality as it is today (see Turok, 2001). Thus, the municipality could be considered to still be settling into its role following these multiple structural shifts in local governance in South Africa. Compounding this are the 'wicked problems' that challenge sustainable development. Coupled with new local government mandates, tensions of prioritisation arise in policy and implementation, particularly in terms of the rapidly evolving and expanding mandate for new responsibilities (such as climate change adaptation and sustainability) which can be considered to compete with the provision of basic services and functions that are essential to the efficient running of a city. Further, addressing challenges of inequality and urbanisation in a rapidly changing institutional architecture (which requires much capacity in and of itself) has major capacity implications as well as requirements for new knowledge and policy responses.

Equally important in terms of context is the leadership of the City of Cape Town. Between 1994 and the current period, local government leadership has changed from the African National Congress (ANC) to the Democratic Alliance (DA). The Western Cape is governed at a provincial level by the DA too, although nationally, the DA is in opposition to the ANC. The City of Cape Town is the only metropolitan municipality run by the DA. Cape Town's political scenario provides both opportunities and constraints for urban sustainable development. An embedded researcher suggests that Cape

Town's status as the only metropolitan municipality governed by the DA means that the City is 'used as a showcase for the economic, environmental, human settlement and municipal governance of the Democratic Alliance'. Although not obvious in the five strategic documents examined through the GAPS process, it could be asked whether competition between the DA and the ANC could be used to heighten the sustainability agenda, albeit if this is a superficial understanding of 'sustainability'. Holgate (2007: 476) suggests that this could be the case, as 'different political parties control the provincial and local legislature, resulting in a peer pressure mechanism whereby neither the provincial nor the local government want to be seen to be less successful in implementing climate change projects'. The notion of benchmarking between these two political parties and the ensuing compliance culture that potentially results from this is also important to consider when exploring issues of sustainability at the city scale.

Each of the five strategies explored in this report speaks to these contextual issues. Despite the focus of the strategy/policy (i.e. economy, spatial planning, environmental management, city development, energy governance), the socio-economic struggles of the majority of the population, as well as the circumstances in which this group lives (often in peripheral locations, in tenuous informal situations, far from opportunities) have to be taken into account. As a result, sustainability is defined broadly, where sustainable development is understood to strive for a balance between economic, social and natural environmental needs, and look for new pathways that do not require tradeoffs in any of these three spheres.

Framing: 'Fair', 'green' and 'dense' as objectives in City strategic plans and policy initiatives

The Mistra Urban Futures focus areas of 'green' and 'dense' are addressed as central themes, both explicitly and implicitly, in the five policy initiatives that have been explored in the research, while the 'fair' theme is prioritised in these policies. This explicit focus on fair, equitable access to resources and opportunities is central to all policies and strategic initiatives in Cape Town as a direct consequence of South Africa's history of segregation. Indeed, the challenges⁵ that face the City (and the city) are very similar to those listed as contextual issues. We suggest that this is because in the case of a southern city such as Cape Town, although these issues are historic, they nonetheless impact on current practices and therefore remain significant.

The issue of scale is important in understanding many of these challenges to sustainable urban development. Scale is important in this report in two ways. First, the issues that affect sustainability

⁵ For a comprehensive list of the obstacles that exist to development in the City, see Annexure 2, pp. 88-89 of the City Development Strategy.

are often global in nature, yet have serious effects at the local scale and demand responses at this level. Nonetheless, there is a need to address, support or mitigate these challenges at different scales (the level at which mitigation, prevention and adaptation should occur is often contested. This is discussed in relation to government spheres in the following theme). The emergence of complex, wicked new problems requires new tools and approaches for these that differ from other, 'everyday' service delivery type of requirements. Scale is thus an important factor in understanding how issues such as climate change affect smaller areas.

The second way that scale is important in this case is the way in which the city is conceptualised through the stated vision and ambition of the City. In some policy rhetoric, the city is positioned as a 'world city', or as a 'design capital'.⁶ These aspirations shape the ways in which politicians would like the city to be viewed, and focus on attracting attention from certain areas (such as investors) (see Hodson and Marvin, 2009: 524). The mobilisation of bias in the allocation of resources implicit in these conceptualisations of the City seems to be at odds with the high levels of poverty and inequality that exist. While politicians may strive for our cities to be 'world cities' with the attributes that accompany this (such as open markets linked to the global economy, and as a result, the more localised issues that result from the need for private sector investment – see Miraftab, 2007), in reality, many of the challenges that beset the country have to be addressed at local scales. While looking to promote a city as a 'world city' is appealing to attract investors, the likelihood of this status having an immediate, tangible effect on the socioeconomic disparities is unlikely.

Compromise

The changing mandate and role of cities in South Africa (through the Municipal Systems Act, 2000, and others since then) has happened over a short period of time. To compound these shifts, the mandates and roles of cities have changed, in many situations adding to the responsibilities of cities, which has meant that the City's responsibilities are simultaneously 'too political for technicians and too technical for politicians' (embedded researcher). In situations where continuing to provide high levels of services is necessary, coupled with transformation that speaks to socio-economic well-being, sustainability and environmental safety, compromises occur when cities and processes are 'locked in' to certain systems that are difficult to change. Given the tensions between these new mandates concerning 'environmental issues' and the traditional 'service delivery' and poverty alleviation functions, skilled policy developers find astute ways of combining these in order to address the newer 'nice to haves' with the projects that are necessary for a functional city

⁶ See, for example, Cape Town's successful World Design Capital 2014 bid, as well as Cape Town Tourism, and the Cape Town Partnership.

(embedded researcher). Projects are also more likely to be successful if they speak to the political priorities formalised in the Integrated Development Plan (IDP).⁷ Furthermore, all projects or policies ought to demonstrate that they understand the fundamental service provision responsibilities of the City. In adopting language that resonates with those who approve policy as well as compliance with the budgeting requirements of the City, the implementation of policies appear less demanding with a ‘watered down’ adherence to the principles underpinning the original, draft policy.

For these reasons, we suggest that it is crucial for officials working on matters of environmental importance to have an institutional knowledge of the City and how it functions in order to elevate the environmental agenda in areas of strategic decision making within the City. We contend that environmental issues rarely get political buy-in without a strategy or policy that addresses financial and social imperatives. In addition, the existence of a champion is a driver for particular projects with an environmental agenda, as is previous work on the topic, particularly if this has occurred through partnerships with external agents.

While the extension of the responsibilities of local government means that more action can occur at this smaller scale, the shifting role of Cities has an effect on the capacities of those working in the departments who have to take on additional roles in light of these changing mandates. Often, these individuals are not equipped to deal with the implications of these changes (see Pasquini et al, 2013). At the same time, there are differing perceptions within local government bodies of what the priority issues are: ‘Perceptions of the priority issues differ across individuals and departments – the city is not a homogenous entity and guiding policies and strategies are interpreted subjectively by the departments, units and individuals’ (embedded researcher). Policy also has to take into account revenue implications, be compliant legally and should be politically defensible in order to be passed. These stringent requirements that policies have to meet can mean that policy drafters avoid risks and instead of experimenting with adaptive management, pursue a more compliant path. Competing rationalities across City departments result in compromise playing an important role in policy development and writing. This kind of compromise results in a ‘compliance’ culture, which can have adverse effects on the ‘wicked problems’ that require innovative responses that may not always be popular with all City departments, with implications for the citizenry and addressing questions of inequality.

⁷ The Integrated Development Plan (IDP) is a local government’s five year strategic-developmental plan that sets strategic and budget priorities (see <http://www.capetown.gov.za/en/IDP/Pages/WhatIsThe5yearPlan.aspx>, accessed 17 January 2014).

Knowledge

Different knowledges inform policies – this includes substantive knowledge as well as institutional (tactical) knowledge that is typically learnt over time by individuals working at the City. To construct policy, institutional knowledge and an understanding of how the organisation functions is important. Moreover, a need for appropriate implementation strategies, protocols, spatial tools and so on are required to ensure that the policy is implemented in the way in which it was intended. Institutional knowledge includes the recognition that successful policy development requires the correct political climate in order to gather support. It is also important to recognise policy catalysts (see Hodson and Marvin 2010: 478) (for example, in the Cape Town case, these included rolling energy black-outs stemming from the national energy service-provider, which prompted support for energy saving campaigns). Concern has been expressed that the lack of continuity in political positions due to electoral cycles means that institutional learning is often not sustained, and is not passed. One way of sharing this knowledge could be through the introduction of more informal spaces for interaction and sharing among officials and politicians.

Policies are developed using different knowledges. Typically, this comes from the individual or team or the team working on a particular policy. It also depends on who is consulted during the research or review process, as well as what questions are asked, those that are not asked, and the options that are opened for discussion. Knowledge that is used to inform policies is thus rarely objective. Policies are drafted by officials with different knowledges and it is inappropriate to assume that all government employees know the same things, or share the similar priorities. Certain officials and politicians have specialist knowledge that relates to quite specific mandates. Finding ways that bridge these knowledge differences is important for policy to be useful, relevant and contemporary, whilst not exclusionary for the officials who will need to use and implement this policy, as well as the politicians who need to understand these documents in order to support them (and defend them if necessary).

Stakeholder knowledge is of vital importance in the writing of policies and strategies, partly because stakeholders bring different knowledge to bear on proceedings. Stakeholders include academia, NGOs, local government associations, national and provincial government and the private sector. Civil society is also a stakeholder, although engagements with this group typically occur once a policy has been drafted (unless it is debated in the media). At times, public engagement can be seen to hinder policy processes, particularly in terms of time and resources.

Monitoring and evaluation of policy is important to ascertain whether or not it works, to what extent, and to determine how it could be changed to improve its functioning. There is a growing acceptance that monitoring and evaluation no longer has to be done in a quantitative way, and that other measures can be incorporated to provide a more accurate evaluation of policies and strategies and their programmes.

Spaces for interaction

The research process highlighted the need for more spaces for interaction between officials, politicians and stakeholders. This would assist in promoting the 'whole organisation' approach that the City aspires to, and may help to shift some of the competing rationalities that exist between different departments in the City. Stakeholders fulfil other important roles, too. They act as intermediaries, provide independence and impartiality, provide rigour, provide evidence to policy design and management, ensure knowledge exchange and facilitate joint strategy development. Stakeholders can also be seen to 'legitimate' the actions of Cape Town's opposition-led government.

It was noted in a workshop with City officials that spaces for interaction, real dialogue, sharing and learning between politicians and officials are lacking. Deliberative spaces for understanding complex issues are much needed. The emergence of polycentric and multi-level governance approaches corroborate this.

The politics of decision-making

The complicated contextual issues and obstacles that challenge the City in turn shape the decision-making environment. Key factors for consideration when looking at decision-making are issues of scale and time frames for decisions. For example, electoral cycles are 5 years in length, and so decisions made in this period may only stick for short periods of time – these short time frames have adverse effects on issues that require long-term decisions (such as climate change). Not only does the short political time frame have effects on the implementation of policy, it also affects how policies are conceived. Changes in management can adversely affect the trajectory of a policy's development, as well as change the content of it.

The City of Cape Town is in the process of shifting to a 'whole organisation' approach to policy-making in order to improve policy design and implementation thereof. The Strategic Policy Unit 'was established as an institutional structure to prioritise and coordinate overall strategic direction. This is to be achieved alongside institutional reform and reconfiguration and alignment of working groups,

sub-committees and task teams, although the impact/effect of such institutional reform has been questioned' (embedded researcher). Transversal Cluster Management (where clusters are comprised of working groups made up of members from different line departments) is being promoted as a way of achieving this. Effective policy development and design is different for different officials and departments in the City – for some, it's about whether the policy speaks to the brief, for others, it's about whether it is implementable, technically sound, grounded in evidence-based data and assumptions and is not overly burdensome. It should also generate political support and be defensible. That the City is not a homogenous entity could complicate this 'whole organisation' approach.

The City (and indeed the city, too) is made up of competing rationalities. At a broad scale, competing rationalities are evident in which strategies are prioritised by senior officials and politicians. The strategies that find favour are often those that focus on 'people' and 'profit', and neglect to address the environmental aspect of the triple bottom line. The prioritisation of these strategies means that the environmental agenda continues to be perceived as a costly extra, rather than an imperative for sustainable development. It is here where projects such as Mistra Urban Futures have an important role to play in heightening the awareness and necessity of sustainability in growth and development. Aligning the visions of different departments is a necessary but difficult task. 'The process of aligning visions both within local government, between spheres of government and across sectors in Cape Town requires a range of institutional structures. To begin with, it is necessary to have mechanisms of negotiating and pursuing common visions within the City of Cape Town. The objective of such an institutional structure would be to establish a shared, negotiated and mutual understanding of issues, to avert antagonism between municipal units and relationship building between municipal units. Moreover, within local government there is a need for spaces or hubs that allow for experimentation and innovation where officials are [insulated]from risk – and rules and rigid delegations are relaxed. There is also a need for long term planning capacity and strategy' (embedded researcher).

This is not to say that it is always possible to influence how policy is decided upon. 'Policy decisions are not always made through formal channels. The policy direction of a department is often defined by the individuals, institutional cultures, rationalities and priorities of the departments. Policy decisions are often made in informal meetings, discussions or operations related meetings' (embedded researcher). Tracing how decisions are made is therefore a discursive process, with no obvious formal routes to pursue.

Visibility

Reflecting on stories of innovation in the City is important to validate the work of officials and politicians. In surfacing the ways in which policy is designed, the City is made accountable for these decisions. In many ways, Cape Town is both held up as an example of what can be achieved in metropolitan municipalities, and derided (often by political rivals) for the many shortcomings that undermine the rhetoric of the 'equal opportunity' city, and the 'city that works for all'. While the failings of the local government are easy to find in the media, the good news stories of innovation are less well publicised. In the Cape Town platform workshop, it was noted that Cape Town has many of these. The utilities department is strong, with high cost recoveries; the City has an information technology system that is lauded internationally (the SAP system); and the City is financially stable and adept at billing. There is a need to tell these stories, not just for the sake of reputation-building, but also because visibility increases accountability.

An official noted that there is a need to make processes of decision-making visible to allow for interrogation of the complexities of issues, conflicts of interest (for example, the disconnect between electricity demand and supply issues and public drives of awareness to save energy, contrasted with the City's loss of income as a result). Visibility means that decisions need to be made in ways that are defensible and credible.

Conclusion

This report has sought to explore decision-making in the City of Cape Town. Focussing on five key policy initiatives and strategic documents, we have interrogated each according to the key areas for research as outlined in various Mistra Urban Futures documentation. This research has indicated that themes in decision-making can be found across various policies and strategies that are not limited to just one department.

The themes explored in this report suggest that the City of Cape Town has changed immensely over the post-apartheid years, not only structurally, but also in terms of the changes in mandate and the increasing roles the City has to fulfil. Understanding the City's mandates contextually, particularly the country's apartheid past, the severe levels of inequality, as well as the imperative for growth and development through investment and tourism is important.

The implicit framing of many of the City's policies and strategies in similar language to the Mistra Urban Futures focus areas of fair, green and dense is also interesting, and speaks to the global nature of the challenges that face the city. Nonetheless, the contextual specificities of the City of Cape Town preclude the use of global solutions, thus requiring context specific interventions. Different knowledges that inform policies is another key theme that arose, not just in terms of content knowledge, but also the institutional knowledge that is typically learnt over time by individuals working at the City. Stakeholders play key roles in providing further content knowledge to policies and adding rigour and credibility to the process of policy development.

The research process highlighted the need for more spaces for interaction between officials, politicians, and stakeholders. This would assist in promoting the 'whole organisation' approach that the City aspires to, and may help to shift some of the competing rationalities that exist between different departments at the City.

The need to reflect on stories of innovation in the City is important, validating the work of officials and politicians, whose efforts are often not recognised by the public or peers in other government institutions. Also, in increasing the transparency through which decisions are made, the City is held to account for choices that do not sit in accord with policies it has drafted. While these themes are not new discoveries, it is noteworthy that five policy documents of different levels of intent and content speak to similar issues. This suggests that understanding decision-making processes at the City scale is important for fostering alternate development pathways.

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