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# Rebuilding the City of Aleppo: Do the Syrian Authorities Have a Plan?

*Myriam Ferrier*

**Wartime and Post-Conflict in  
Syria (WPCS)**

Research Project Report  
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# Rebuilding the City of Aleppo: Do the Syrian Authorities Have a Plan?

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## Executive Summary

Analysis of the measures adopted by the Syrian government to pilot the restoration and future reconstruction of Aleppo shows a project-based response rather than an overall plan. The partial and controlled communication of damage estimates realised by the General Company for Engineering and Consulting (GCEC) allows the government to maintain its leadership in the definition of priority neighbourhoods. The Emergency Response Plan adopted in January 2017 and the revised Aleppo master plan of 2018 address different publics but overlook the low-income population.

From the government's perspective, rebuilding the local administration and the links between the different levels of state institutions also appears to be a central issue in the reconstruction of the city. This process is highly centralised, as is shown by the role of the Ministry of Local Administration (MoLA) in defining priority projects and following up on their implementation. Despite a visible involvement of the local administration in urban planning, the city council has no decision-making responsibilities. Furthermore, the appointment of reliable people to key administrative positions in the city is part of the central government's strategy to rebuild state institutions at the local level.

The dominant reconstruction discourse and practices are shaped by a growing interference by the public and private sectors, which impacts official decision-making. The reclassification of informal settlements as real-estate development areas under law 15/2008 has provided real-estate development companies with an additional lever for action. While the government claims to control these companies through accreditation, they are negotiating a revision of the law to achieve greater economic benefits, as is illustrated by the case of the al-Haidariyya neighbourhood.

## Introduction

After four years of fighting and siege from July 2012 to December 2016, Aleppo – the second largest city in the country – was recognised as the most damaged city in Syria. In 2017, Abdullah al-Dardari, the deputy executive secretary of the UN Economic and Social Commission for West Asia, reported war damage in the city costing more than 52 billion dollars.<sup>1</sup> According to a World Bank estimate, housing sector damage alone ranged from 6.2 to 7.6 billion dollars.<sup>2</sup>

The destruction particularly affected the old city and Aleppo’s eastern and southern districts, which housed a low-income population before 2011 and remained under the control of opposition forces until late 2016. In December 2019 three years after the Syrian government regained military control of these neighbourhoods, Aleppo’s population was estimated at 1.6 million, including 190,000 internally displaced persons (IDPs),<sup>3</sup> compared to a population of 2.4 million inhabitants in 2011.<sup>4</sup> Based on these figures, a million of the 2011 population have not yet returned.<sup>5</sup>

Several reports produced by international organisations have focused on damage assessment in Aleppo and on the economic impact of the conflict to identify needs, prioritise relief efforts and early recovery responses and draw up post-conflict planning.<sup>6</sup> A profile of Aleppo city presents a comprehensive analysis of the conflict dynamics which have affected the city and of the needs of the residents by sector.<sup>7</sup> Other studies have stressed the Syrian authorities’ instrumentalisation of urban policies to prevent the return of opposition figures, achieve demographic change and reward supporters.<sup>8</sup> The end of the Aleppo political order has also been discussed in relation to the role of the traditional and new classes of Alepine businessmen in the reconstruction.<sup>9</sup>

Few studies, however, have raised the question of the reconstruction of the city as a product of multi-level interactions between the central government, the local administration and other local stakeholders (both public and private actors). Who are the main decision-makers in reconstruction planning and whose interests are they primarily addressing? Is the Syrian authorities’ strategy to rebuild the city or the state institutions? To what extent are the private sector and businessmen investing in the reconstruction of the city and influencing public sector decisions?

This article first examines the different measures and plans adopted by the Syrian government and the local administration since 2017 to start restoring neighbourhoods. It then focuses on the links between ministerial and local actors involved in the reconstruction process. Finally, it analyses the

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<sup>1</sup> Hassan Ammar, “Rebuilding Aleppo Will Take Billions of Dollars,” *The Arab Weekly*, 19 February 2017, <http://bit.ly/2FVVOwE>

<sup>2</sup> World Bank Group, “Syria Damage Assessment of Selected Cities: Aleppo, Hama, Idlib” (Washington: IBRD/ The World Bank, 2017), iv, <http://bit.ly/2VkkebY>

<sup>3</sup> Data courtesy of the Humanitarian Needs Assessment Program for Syria (HNAP).

<sup>4</sup> Patrick Wakely and Razan Abdul Wahab, “Informal Land and Housing Markets in Aleppo,” *GIZ and Aleppo City*, December 2010, unpublished report, 8.

<sup>5</sup> According to other estimates, between 743,943 and 824,168 individuals who fled Aleppo have not yet returned. Numbers courtesy of HNAP.

<sup>6</sup> UNOCHA, *Humanitarian Needs Overview*, March 2019, <http://bit.ly/2uKyGPK>. See also World Bank, “Syria Damage Assessment of Selected Cities,” 1; World Bank, *The Toll of War*, 2018, 78, <http://bit.ly/2RBCpYL>

<sup>7</sup> UrbAN Syria, *Aleppo City Profile*, July 2019, restricted access.

<sup>8</sup> Anna Costa and Michele MacMillan, “From Rebel to Regime: Barriers of Return to Aleppo for Internally Displaced People,” *The Aleppo Project*, CEU Shattuck Center, School for Public Policy, July 2018, <http://bit.ly/2SN4gEG>. Jihad Yazigi, “Destruct to Reconstruct. How the Syrian Regime Capitalises on Property Destruction and Land Legislation,” *Friedrich Ebert Stiftung*, July 2017, <http://bit.ly/2SjjCBu>

<sup>9</sup> Kheder Khaddour, “Consumed by War. The End of Aleppo and Northern Syria’s Political Order,” *Friedrich Ebert Stiftung*, October 2017, <http://bit.ly/2uBzE0M>

issue of informal settlements and their reclassification as real-estate development areas to underline the increasing role of real-estate companies and businessmen in shaping the dominant reconstruction discourses and practices.

The study relies on an analysis of the legal framework related to urban issues and the local administration, and monitoring of official (ministry and local administration) websites and local media (Aleppo newspapers). It also uses interviews with a small number of implementing partners and international organisations based in the city, academic literature on Aleppo's social fabric and thematic reports produced by international organisations.

# 1. The Restoration of Aleppo: a Project-Based Response Formulated at the Government Level

The scale of destruction in Aleppo is massive. Most damage is located in the eastern and southern parts of the city, where the conflict led to a massive displacement of the population. While facilitating returns has been formulated as an objective in several official declarations,<sup>10</sup> the priority actions decided by the central and local authorities have only marginally targeted the low-income population, which constitutes the bulk of displaced persons and still faces many obstacles to returning.

## 1.1. The Destruction in Poor Urban Aleppo Neighbourhoods

The political division of Aleppo between 2012 and 2016 corresponded to the socio-economic cleavages that developed before 2011. While Aleppo's wealthy urban elite settled in the west of the city, the poor and low-income classes, unskilled workers and state employees inhabited the districts in the east and south, which were mostly formed of informal areas.

Successive city master plans (in 1954, 1974 and 2012)<sup>11</sup> favoured the development of low-density residential areas in the western part of the city in which the low-income class could not afford to live, providing them with quality services. These master plans reserved the districts located to the east, south and north of the city for popular housing, and they developed informally with poor infrastructure, either as part of the master plans or not, and were neglected by the public authorities.<sup>12</sup>

The population of the eastern and southern neighbourhoods included migrants of different origins. Settling in different periods of time since the fifties and coming from different places of origin, this population was not homogenous in its socioeconomic characteristics.<sup>13</sup> Some came from the old city as a result of its gentrification and others from rural areas with different backgrounds. The population grew more in the decade prior to the conflict<sup>14</sup> as a result of economic policies and ongoing drought. A lack of assimilation of the young urban poor under al-Assad's economic liberalisation policies explains why these areas formed a suitable environment to host opposition.<sup>15</sup> Strong relations between migrants from rural Aleppo who settled in the eastern neighbourhoods and their original areas, in which the Free Syrian Army organised before controlling the city of Aleppo, are also behind the rallying of these neighbourhoods to the opposition.<sup>16</sup>

On the western side of the city, the Sunni bourgeoisie was marginalised by the Syrian authorities under Hafez al-Assad, as Aleppo was considered to have joined the rebellion led by the Muslim Brotherhood between 1979 and 1982. But this bourgeoisie was co-opted under Bashar al-Assad in the 2000s and mostly remained loyal after 2012. Additionally, western Aleppo hosts the regional

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<sup>10</sup> See, for example, MoLA, "The Reconstruction Committee in Aleppo Governorate Calls for the Formation of a Legal Group to Draft the Necessary Legislation for Reconstruction" (in Arabic), 2 January 2017, <http://bit.ly/37xvQLc>

<sup>11</sup> SANA, "New Aleppo Master Plan" (in Arabic), 19 September 2017, <http://bit.ly/3cX9RBv>

<sup>12</sup> Salwa Sakkal, "Growth and Control of Space. The Informal and Urban Planning, the Municipality and the State" (in French) in *Alep et Ses Territoires, Fabrique et Politique d'une Ville (1868-2011)*, ed. David Jean-Claude and Thierry Boissière (Beyrouth and Damas: Presses de l'Ifpo, 2014), 197, <http://bit.ly/2SrXALI>

<sup>13</sup> Balsam Ahmad, "Neighbourhoods and Health Inequalities in Formal and Informal Neighbourhoods of Aleppo" in *Syria's Contrasting Neighbourhoods: Gentrification and Informal Settlements Juxtaposed*, ed. Ahmad B. and Sudermann Y. (Fife, Scotland: Lienners Publishers, 2012).

<sup>14</sup> In Aleppo's informal settlements, the population growth reached 4% a year in 2010, that is, 8,000 households a year in 2010. Wakely and Abdul Wahab, "Informal Land and Housing Markets in Aleppo," 5.

<sup>15</sup> David Kilcullen and Natt Rosenblatt, "The Rise of Syria's Urban Poor: Why the War for Syria's Future Will Be Fought over the Country's New Urban Villages," *PRISM*, Vol. 4 (2014), 33, <http://bit.ly/37CoCqI>

<sup>16</sup> Khaddour, "Consumed by War."



headquarters of state institutions, the security agencies and the military apparatus.<sup>17</sup>

Aleppo's highly damaged areas correspond to formerly opposition-held neighbourhoods. Districts that remained under the Government's control in the western part of the city registered far lower levels of damage.

Estimates of the number of buildings damaged in Aleppo were first released by international organisations. The United Nations Institute for Training and Research and its operational satellite application programme (UNITAR-UNOSAT) reported an estimate of 33,521 damaged buildings in September 2016 on the basis of satellite imagery.<sup>18</sup> The World Bank made an assessment in 2018 which was also the result of a remote analysis using satellite data, and was cross-checked using secondary sources of information. However, it reported damage in terms of housing units instead of buildings, distinguishing housing units partially damaged from those completely destroyed: 154,465 of the 662,323 housing units (or 23 percent of the stock) suffered partial damage, while 49,830 (or 7.5 percent) were completely destroyed. Destruction in the Old City reached 70 percent according to the Agha Khan Foundation.<sup>19</sup>

The Syrian authorities on their part entrusted the assessment of damage to infrastructure, public buildings and residential buildings to the General Company for Engineering and Consulting (GCEC), which is linked to the Ministry of Public Works and Housing and was renamed General Company for Engineering Studies in April 2019. In August 2018, the then head of Aleppo City Council, Engineer Mohamad Hallaq, declared that across the whole city 209,432 buildings were damaged, including 16,283 buildings completely destroyed, 15,499 seriously damaged requiring demolition and 65,460 buildings with medium or light damage which could be restored. Around 54% of the total number of buildings in the city were not damaged.<sup>20</sup>

The Syrian authorities' monopoly of on-ground damage assessment and the limited communication of the methodology and results allows them to maintain the upper hand in defining the most damaged areas and setting priorities. This holds a potential for significant abuse and discrimination against residents in the reconstruction process.

## 1.2. The Politics of Reconstruction

The reconstruction of Aleppo is being guided by a general master plan of 2018 within the priorities of an Emergency Response Plan (ERP) adopted in January 2017. Following the development of the master plan, in a second step urban planning should be formulated in detailed plans for the areas concerned. In a third step, a legal framework to actually implement these plans must be adopted by the authorities.

### The Emergency Response Plan (ERP)

The ERP was adopted by the city council on instruction by the MoLA in January 2017. It was presented as a result of discussions between the executive bureaus of both Aleppo Governorate and Aleppo City Council. The plan sets nine priorities (Figure 1).

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<sup>17</sup> Jean-Claude David and Thierry Boissière, "War Against the State, War Against the City: Aleppo, Hostage Fighting in Syria" (in French), *Moyen-Orient*, October-December 2014, <http://bit.ly/2uo6zpe>

<sup>18</sup> UNITAR, "Neighbourhood Shelter Damage Percentages in Aleppo City," 19 December 2016, <http://bit.ly/2LU7N1g>

<sup>19</sup> Palermoworld, "Presented the Project for the Reconstruction of the Souk, the Omayyad Mosque and the Minaret," 2018, <http://bit.ly/39M3K0U>

<sup>20</sup> Maan al-Ghadri, "The New Master Plan Will Change the City's Identity" (in Arabic), *al-Shahba*, 17 July 2018, <http://bit.ly/2RfJZHW>

**Figure 1. Emergency Response Plan Adopted by the Aleppo City Council (Extracts)**

<b>In application of the government guidelines January 2017</b>	<ol style="list-style-type: none"><li>1. Opening of the main axes and streets to reconnect the city's neighbourhoods</li><li>2. Restoration of [some] buildings and public services</li><li>3. Restoration of three industrial areas</li><li>4. Restoration of the least damaged and most populated areas and damage compensation (six districts)</li><li>5. Development of two informal settlements reclassified for real-estate development.</li><li>6. Development of municipal tools (Aleppo City Council)</li><li>7. Development of Aleppo City Council's human resources.</li><li>8. Continuation by public works companies of the projects financed by the reconstruction fund.</li><li>9. Invitations to companies to invest in rubble recycling.</li></ol>
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Source: Aleppo al-Shahba News Network<sup>21</sup>

Multiple projects associated with the plan's priorities have either been implemented or are in the process of implementation across the city. Rubble removal and recycling have commenced in multiple locations. The United Nations Development Programme (UNDP) has participated in rubble removal on three sites in the old city and, on a smaller scale, in the eastern districts.<sup>22</sup> Funded by the Office for the Coordination of Humanitarian Affairs (OCHA), UNDP is also working with the NGO Rescate and the Syrian Trust for Development on the transformation of rubble for re-use under the supervision of the governorate and the Aleppo City Council.<sup>23</sup> Another recycling project is being carried out by Aleppo City Council in Karm al-Jabel.<sup>24</sup>

The restoration of public spaces and services in specific districts has also commenced. Among the projects prioritised was the repair of Souk al-Hal – a popular wholesale market for fruit and vegetables in the city centre since 1962. The al-Ramousse area was also identified for restoration of its garage, bus station and slaughterhouse, in which delays have been reported.<sup>25</sup> Other projects include restoring other local popular markets, public squares, fire stations and administrative centres.

As for industrial areas, in January 2017 a budget of 100 million SYP (about 187,000 euros)<sup>26</sup> was allotted to each of the three areas identified in the ERP: Arqub, Kalasse and al-Ramousse. Additional projects were later approved in the industrial city of Sheikh Najjar and in the industrial areas of Balayarmun, al-Shaqif and Jibrin.<sup>27</sup> By December 2019, 16,000 out of 35,000 industrial facilities were confirmed productive.<sup>28</sup> Prioritising work in industrial areas reflects official narratives about restoring Aleppo's production capacity and returning the city to its status as the industrial capital

<sup>21</sup> Aleppo al-Shahba News Network, "Aleppo City Council and First Aid Intervention Priorities in the Liberated Neighbourhoods" (in Arabic), 18 January 2018, <http://bit.ly/2Ps5dl4>

<sup>22</sup> WhatsApp interview with a staff member of an international organisation, 27 January 2020; UNDP in Syria, "Leaving No One Behind," *Annual Report 2018*, 38, <http://bit.ly/3638Xij>

<sup>23</sup> Ministry of Water Resources, "Engineer Arnous Inspects the Rubble Recycling Project" (in Arabic), 17 March 2019, <http://bit.ly/2ZsQYQm>

<sup>24</sup> Nizar Tantura, "National Project for the Recycling and Using Building Debris" (in Arabic), *al-Shahba*, 17 July 2018, 4, <http://bit.ly/2RfjZHW>

<sup>25</sup> Complaints of the people of Aleppo, "Inspection Tour of the State of Work in Slaughterhouse" (in Arabic), Facebook, 18 November 2018, <http://bit.ly/3983atC>

<sup>26</sup> Central Bank of Syria, Exchange Rate Bulletin, 31 January 2017, <http://bit.ly/2OQU64o>

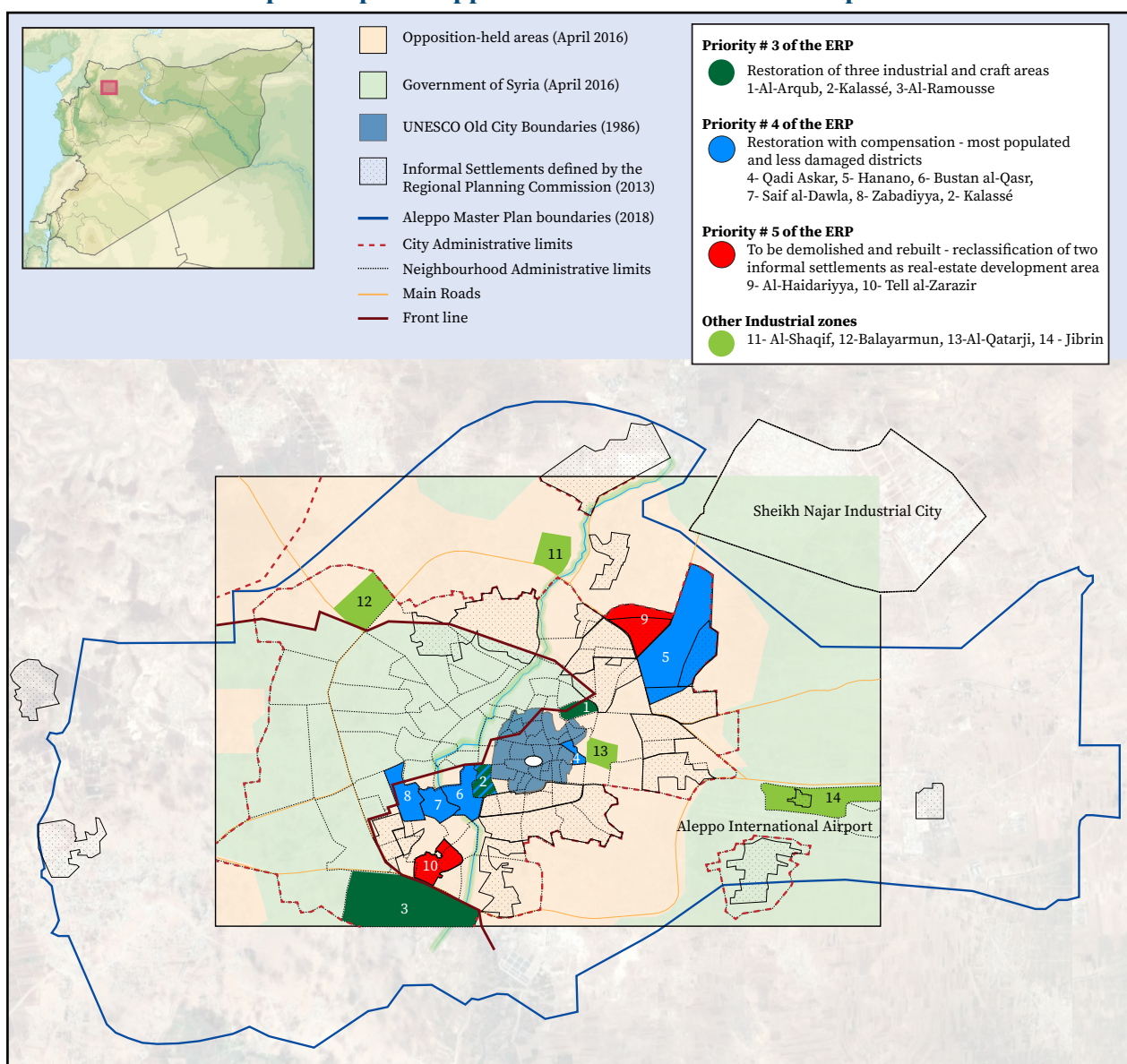
<sup>27</sup> Mahmoud Saleh, "Aleppo Takes Off the Dust of War and Comes Back to Life Again" (in Arabic), *al-Watan*, 4 December 2019, <http://bit.ly/2QjUDwO>

<sup>28</sup> Golantimes News, "The Syrian Capital of Industry. Return of 16 Thousand Production Facilities" (in Arabic), 22 December 2019, <http://bit.ly/2G7JJ7S>

of Syria, as formulated by the Prime Minister and the Aleppo Governor.<sup>29</sup> The efforts made so far, however, seem to have been inadequate as there are constant reports of criticism by industrialists.<sup>30</sup>

As for housing, the ERP prioritises two forms of intervention. The first addresses the repair of “the less damaged and most populated neighbourhoods,” namely Hanano, Qadi Askar, Saif al-Dawla and Zabadiyya, Kalasse and Bustan al-Qasr. The ERP also provides for compensation for damage in these areas. However, the reason for selecting these neighbourhoods may be questioned, as UNITAR-UNOSAT’s remote damage assessment shows that Bustan al-Qasr and Kalasse, with respectively 39% and 37% of damage, are not among the least damaged districts. Other factors may have intervened in the selection of these neighbourhoods, among which is their location near the city centre (except Hanano). The second form of response provides for the urban development of two informal settlements – al-Haidariyya and Tell al-Zarazir – under law 15/2008, which entails demolition and reconstruction instead of repair. The audience targeted here are real-estate development companies rather than residents, as the former residents have limited rights (see section 3.2).

**Map 1. Map of Aleppo – The Authorities’ First Response**



Source: The author. Graphic designer: Laura Pigneri, January 2020

<sup>29</sup> Prime Minister’s website, “Under the Direction of President al-Assad ... A Government Delegation Headed by Engineer Khamis in Aleppo” (in Arabic), 1 January 2017, <http://bit.ly/35wPkPU>

<sup>30</sup> Joseph Daher, “Syria’s Manufacturing Sector: The Model of Economic Recovery in Question,” Research Project Report (Florence, Italy: European University Institute, May 2019), <http://bit.ly/2TPEBg3>

## The 2018 Revised Master Plan

Parallel to developing the 2017 ERP, a revision of the 2012 master plan was launched in January 2017 at the request of the Prime Minister and validated in March 2018 by the Minister of Public Works and Housing, Hussein Arnous.<sup>31</sup> Under Law 5/1982, master plans in Syria are developed for 20 years and the Syrian government has a legacy of extremely delayed processes.<sup>32</sup> Officials justified developing the 2018 master plan with the need to consider war damage and stressed its relevance to Aleppo's future and economic recovery through tourism and investment.<sup>33</sup> Comments by citizens on social media, however, refer to the unprecedented speed of the production of the new plan as a politicised tool to deprive people of their rights, given the huge numbers of residents displaced from Aleppo and the authorities' traditional practice of manipulating the production of master plans in favour of certain officials and officers.<sup>34</sup>

In fact, the new master plan is highly technical as it mainly defines urban zoning and the density of residential areas but not the projects *per se*, which are defined in a second step.<sup>35</sup> The plan developed for the next 20 years supposedly takes into account population growth in the city.<sup>36</sup> However, whether this includes refugees and IDPs from Aleppo is unknown. No information is provided regarding this estimate or the method used.

The projects in the 2018 master plan are endorsed step by step. The development of the two informal settlements of al-Haidariyya and Tell al-Zarazir is being treated by the authorities as a new measure, despite having been decided in 2010. The transformation of the original location of Souk al-Hal into a tourist and commercial centre was also endorsed in parallel with the relocation of the wholesale market itself to al-Ramousse. Other projects include improvements to the citadel perimeter<sup>37</sup> and the transfer of industrial zones to the industrial city of Sheikh Najjar.<sup>38</sup>

## The Legal Framework for Implementing Plans

Urban planning is highly centralised in Syria as plans and the relevant legal frameworks must be approved at government level (Figure 2). Additionally, detailed master plans for different areas defined in a general master plan need to be further developed. The legal frameworks for developing different areas should also be agreed on as different laws may apply: Law 15/2008, Law 23/2015 or Law 10/2018.

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<sup>31</sup> In order 791 dated 5 March 2018. See Ayman Duri, "Approving Aleppo Master Plan" (in Arabic), *Dampress*, 9 March 2018, <http://bit.ly/2voB2DZ>

<sup>32</sup> Thirty-eight years had passed between the previous master plan of 1974 and the 2012 one.

<sup>33</sup> According to the previous head of Aleppo City Council, "the new master plan will change the identity of the city by giving it economic importance and societal stability," in al-Ghadri, "The New Master Plan Will Change the City Identity."

<sup>34</sup> See the comments on the Aleppo City Council post, "Approval of Aleppo Master Plan" (in Arabic), Facebook, 8 March 2018, <http://bit.ly/2wWDSu9>

<sup>35</sup> Note 37 of 28 November 2017 to modify the 2012 Master Plan. See also the attachments to the Aleppo City Council posts, "Notice" (in Arabic), Facebook, 14 January 2018, <http://bit.ly/2vnh3WJ>; and "Approval of Aleppo Master Plan" (in Arabic), Facebook, 8 March 2018, <http://bit.ly/2wWDSu9>

<sup>36</sup> Maan al-Ghadri, "The New Master Plan puts Aleppo at the Forefront of New Cities" (in Arabic), *al-Shahba*, 8 May 2018, <http://bit.ly/36rvR31>

<sup>37</sup> Maan al-Ghadri, "New Features ... The Service Scene in Aleppo, From the Stumbling Stage to the Recovery Phase" (in Arabic), *al-Shahba*, 14 October 2019, <http://bit.ly/2vuO1V6>

<sup>38</sup> Syria Now, "42% of Aleppo's New Master Plan has been Implemented" (in Arabic), 2 May 2017, <http://bit.ly/2F09bvp>



**Figure 2. The Stages in Urban Planning and Development**

<b>Stage 1</b>	<b>Master Plan (LD 5/1982)</b> adopted by the Ministry of Public Works and Housing (art. 6/A)		
<b>Stage 2</b>	<b>Detailed Plans (LD 5/1982)</b> adopted by the governor (art.6/B)		
<b>Stage 3</b>	<b>Real-estate development zone</b> ( <i>tatwîr</i> ) Law 15/2008  <i>Created by</i> order of the Prime Minister (art. 10)	<b>Developed zone</b> ( <i>tandhîm</i> ) Law 10/2018  <i>Adopted by</i> decree of the Prime Minister (art. 62)	<b>Subdivided zone</b> ( <i>takhtîl</i> ) Law 23/2015  <i>Approved by</i> the Executive Bureau of the Governorate (art. 10)
	<b>On a proposal by:</b>		
	the General Commission of Development and Real Estate Investment (GCDRI)  (under the Ministry of Housing) (art. 10)	the Minister of Local Administration and Environment  (art. 1)	the local authority  (in areas not covered by law 15/2008 or law 10/2018) (art. 8)

Source: The author

Law 15/2008 and law 10/2018 entail the creation of an urban zone (by executive order) and grant limited choices to right holders as development is compulsory. If demolition and reconstruction are involved, the provisions for compensation vary. Law 15/2008 provides for substitute housing or a cash allowance to be granted to the owners of the properties concerned only on private land, in agreement with the real-estate developer (see section 3.2). As for law 10/2018, it gives right holders three options: (1) to request a plot for development and finance the difference between the value of the property before and after the development, (2) to combine their shares with others and create a private company to invest in plots, or (3) to sell their shares in a public auction.<sup>39</sup> It can be seen that shareholders without the necessary resources to finance extra costs are compelled to sell their shares. With the current information available, law 10/2018 would only apply to extension zone S3 (located south of al-Ramousse industrial district).<sup>40</sup>

As for law 23/2015, it establishes that owners must subdivide their land according to the provisions of the approved master plan within three years of their areas being designated for development by the local authorities.<sup>41</sup> Financing the arrangements for the delivery of public infrastructure on subdivided lots, however, remains problematic as the costs must be paid at the time the building permit is granted.<sup>42</sup> In July 2019, it was proposed to apply the law to develop two extension zones (E9 and E4) and three informal settlements in Aleppo.<sup>43</sup>

<sup>39</sup> Article 30/F, Article 31 and Article 32 of Law 10/2018.

<sup>40</sup> Prime Minister's website, "The Continued Restoration of Infrastructure and Services in Aleppo" (in Arabic), Official Web Page, 24 July 2019, <http://bit.ly/3aHvRiD>

<sup>41</sup> Article 8 of Law 23/2015. Note that article 63 of law 10/2018 replaces the provisions of law 23/2015 on development by private companies.

<sup>42</sup> Article 9 of Law 23/2015.

<sup>43</sup> Prime Minister's website, "The Continued Restoration of Infrastructure and Services."

### 1.3. Obstacles to the Return of Low-Income Groups

The measures adopted by the Syrian authorities in both the ERP and the 2018 master plan show a strategy to favour the interests of economic actors by targeting investors in the tourism and industrial sectors. They also show a failure to prioritise the severe needs of the low-income population – which largely consists of displaced communities.

The numbers of people voluntarily returning to their destroyed areas are indicative as the figures have significantly decreased in the past three years. Whereas the UN registered nearly 275,000 returnees in 2017, only 75,000 were registered in 2018 and below 42,000 in 2019. This makes a total of nearly 392,000 since 2017,<sup>44</sup> which is a third of those displaced from Aleppo. Analysis of the returnee figures shows different trends in the districts targeted for housing restoration and development in the ERP. The six districts proposed for restoration register higher numbers of returnees than those designated for real-estate development. In fact, incidents of eviction by the authorities in preparation for the new development have been registered in the latter areas<sup>45</sup> and returns there have reportedly been prevented by militias. Apart from security issues, a lack of services is also cited among the obstacles to returning.

In addition, the urban legislative framework which is used to guide progress in the development of each of the areas targeted for restoration and development has a significant impact on people's willingness and ability to return. Regardless of the nuanced differences in the application of the three laws mentioned above, they are all problematic, especially when guiding reconstruction in a highly politicised context such as that of Aleppo. Their provisions shoulder the cost of reconstruction on the communities affected, the majority of which consist of low-income people. Their strict procedural requirements significantly limit the potential for communities which lack the necessary documents or safe access to state institutions to claim their rights.

Lost property documents are indeed an obstacle to the return of a large number of families. Security measures which are imposed by the authorities definitely reduce IDPs' ability to access state institutions. In addition, parallel systems were developed in the formerly opposition-held areas to document property transactions after the suspension of the General Directorate of Cadastral Affairs (GDCA) registries (under the MoLA), but these systems are not recognised by the Syrian government.<sup>46</sup> Furthermore, the majority of the properties in the destroyed areas were not fully registered with the GDCA before 2011 for technical reasons. Other public institutions (such as courts and public notaries) have, however, issued documents for decades to assert ownership and allow rights holders to register their properties with the GDCA in a next step.<sup>47</sup> Such documents are still recognised.<sup>48</sup>

The absence of state mechanisms to identify and process the wide range of property documents shows that the ability of the low-income population to claim their housing rights is poorly addressed. Under law 33/2017, the reconstitution of destroyed property documents is only provided for title

<sup>44</sup> Data courtesy of HNAP.

<sup>45</sup> Khaled al-Khatib, "Real Estate Development Destroys the Eastern Neighbourhoods of Aleppo" (in Arabic), *al-Modon*, 12 February 2019, <http://bit.ly/37j3HrL>.

<sup>46</sup> Ina Rehama Jahn and Amr Shannan, "'If We Leave, We Will Never Live in this House Again.' Perspectives from Eastern Aleppo on Housing, Land and Property Governance and Rights Violations during the Syrian War" in *Reclaiming Home, the Struggle for Socially Just Housing, Land and Property Rights in Syria, Iraq and Libya*, ed. Hannes Baumann (Friedrich-Ebert-Stiftung, 2019), 85, <http://bit.ly/3cjogaz>.

<sup>47</sup> These documents include court decisions and powers of attorney. The Ministry of Finance issues property tax documents. Myriam Ferrier, "Securing Property in Informal Neighbourhoods in Damascus Through Tax Payment," in *Popular Housing and Urban Land Tenure in the Middle East, Case Studies from Egypt, Syria, Jordan, Lebanon, and Turkey*, ed. Myriam Ababsa, Baudouin Dupret and Eric Dennis (Cairo: American University in Cairo Press, June 2012).

<sup>48</sup> Article 6 of law 10/2018.

deeds produced by the GDCA. This law sets up administrative and judicial procedures to reconstitute destroyed or lost property documents. The reconstitution of titles, however, is conditional on the competent minister having announced the opening of works in certain areas after a proposal by the director of the GDCA. The law does not provide for individual requests outside the designated areas. Finally, only two institutions are authorised by the Syrian government to provide legal assistance to rights holders,<sup>49</sup> both of which are close to the regime's inner circles: the Syrian Arab Red Crescent and the Syria Trust for Development under the patronage of Asma al-Assad.<sup>50</sup>

## 2. Rebuilding the Local Administration Under Government Control

The MoLA's efforts to guide reconstruction have so far aimed to ensure subordination of the local administration, which is made up of two distinct and possibly competing structures: the governorate and the city council. While limited information is available on the role of the governorate in current reconstruction efforts, its traditional overruling decision-making power over the city council may also explain Damascus's desire to keep a close eye on Aleppo. Furthermore, the appointment of reliable figures to the local administration and the mobilisation of other local actors and contractors are part of the central government's strategy for rebuilding state institutions at the local level.

### 2.1. The Central Authorities' Upper Hand over the City Council

Following the recapture of Aleppo city by government forces, the Prime Minister paid at least four high-level visits to Aleppo in three years under instructions from al-Assad. As early as January 2017, al-Khamis visited Aleppo heading a government delegation composed of fifteen ministers. He discussed the priorities for interventions, the modification of the City's master plan and the issue of informal settlements with local stakeholders. The rebuilding of state institutions and work teams was also clearly formulated as an objective.<sup>51</sup> Following up on these issues, another government delegation arrived in Aleppo a year later on a four-day visit. At that time the Prime Minister promised to allocate 10 to 20 million SYP of the next state budget to implementing the Aleppo master plan. He also invited the Chambers of Commerce and Industry to establish private companies to participate in reconstruction works.<sup>52</sup> On his third visit in November 2018, al-Khamis held a meeting of the Council of Ministers in the city and declared a "need to complete the military victory with an economic and political victory with the presence of effective state institutions."<sup>53</sup> He also expressed his government's support for national industry during the Third Industrial Conference held in Aleppo on the same date.<sup>54</sup> In February 2020, the cabinet again held its weekly session in Aleppo, during which it approved an integrated economic, services and construction plan for Aleppo province, allocating SYP 145 billion for it.<sup>55</sup> These high-level visits provided opportunities to organise more targeted meetings, mostly concerning investment, with members of the Aleppo Chamber of Commerce<sup>56</sup> and the Executive Bureau of Aleppo City Council.<sup>57</sup>

<sup>49</sup> Written exchange with a staff member of an international humanitarian organisation, 13 December 2019.

<sup>50</sup> UNHCR, Syria Factsheet, May 2019, 3, <http://bit.ly/38LDovK>

<sup>51</sup> Prime Minister's website, "Under the Direction of President al-Assad."

<sup>52</sup> MoLA website, "Under the Direction of President al-Assad ... A Government Delegation Headed by an Engineer Visits Aleppo" (in Arabic), 8 January 2018, <http://bit.ly/34abHJK>

<sup>53</sup> Al-Baath newspaper, "Under the Direction of President Al-Assad ... The Council of Ministers Holds its Weekly Session in Aleppo" (in Arabic), 5 November 2018, <http://bit.ly/39aVXKe>

<sup>54</sup> Ruaa al-Jazaeri, "Third Industrial Conference Kicks Off in Aleppo," *SANA*, 5 November 2018, <http://bit.ly/2U7W1ni>

<sup>55</sup> SANA, "Cabinet Approves Comprehensive Plan for Development in Various Sectors in Aleppo," 22 February 2020, <http://bit.ly/2IRVGzS>

<sup>56</sup> Al-Baath newspaper, "The Government Delegation Meets the Members of the Syrian Chambers of Commerce in Aleppo" (in Arabic), 6 November 2018, <http://bit.ly/2PSPyKK>

<sup>57</sup> MoLA website, "The Minister of Local Administration and Environment Meets the Executive Office of Aleppo City Council" (in Arabic), 8 November 2018, <http://bit.ly/36OpsPX>

Moreover, at the beginning of 2017, an inter-ministerial committee (representing the Ministries of Public Works and Housing, Religious Endowments, Local Administration and Tourism) was formed to follow up on the implementation of projects funded by the government budget.<sup>58</sup> This committee is headed by Hussein Arnous, Minister of Public Works and Housing from 2013 to November 2018 and then Minister of Water Resources.<sup>59</sup> Its ministerial members regularly visit Aleppo to approve new projects and track progress in the implementation of old ones.

Reconstruction projects in Aleppo city are either funded by Aleppo City Council's budget or by the government budget allocated to implementing reconstruction projects in the country. However, it is very difficult to know the exact amounts of these two types of fund. The presentation of the state budget does not allow the general amount allocated by the MoLA to Aleppo City Council to be known. The council's budget is tied by law to central decisions.<sup>60</sup> Moreover, official information on the government budget allocated for reconstruction in Aleppo does not usually distinguish between the shares allocated to the city and the governorate. In March 2019, Aleppo City Council approved a decision to establish a holding company to manage city assets in reconstruction projects which was based on the model of the al-Cham Holding Company,<sup>61</sup> but no further information was published after this decision. In June 2019, 340 projects had reportedly been implemented in Aleppo city since late 2016 with a total budget amounting to 18,695 billion SYP (38 million euros).<sup>62</sup> Most of these projects relate to the removal of rubble, the paving and asphaltting of roads and renovation of gardens and the internal transport network. They also include the renovation of schools and water and sewage networks.

In addition to being financially constrained, the city council is also limited technically. The governor's powers over urban issues provide him with a strong lever for action. Most city projects, contracts and the detailed plans for urban zones must be approved by the governorate's Executive Bureau. Furthermore, the governor heads the commission responsible for ruling on objections filed regarding the master plan. This means that he can oppose decisions or influence them. The city council retains few means to influence implementation. Its role is limited to carrying out social surveys before the implementation of urban projects, to ensuring compliance with laws and eventually listing property rights.<sup>63</sup> These tasks are realised by districts committees and *mukhtars* directly attached to the City Council's Executive Bureau.<sup>64</sup>

Entrusting the realisation of the Aleppo master plan to the GCEC is in line with practices existing before 2011 and need not be interpreted as a new means to marginalise Aleppo City Council.<sup>65</sup> Resort to public institutions is provided for by the law<sup>66</sup> and the GCEC was traditionally contracted to produce master plans for Aleppo and Damascus prior to 2011.<sup>67</sup>

<sup>58</sup> Written correspondence with UN-related sources in Syria, 9 February 2020.

<sup>59</sup> MoLA website, "Forming a Committee to Reassess Aleppo Master Plan" (in Arabic), 3 January 2017, <http://bit.ly/2Thez5i>

<sup>60</sup> The budget of the city council is made up of two types of resources: own revenue and government allowances. The city's own revenue is calculated in a very complex way according to the type of taxes in a range fixed by the central government and investment revenue. Aleppo Council's budget must be endorsed by the MoLA after approval by the Minister of Finance. See articles 134 and 146 of Law 107/2011 and the Guideline to Law 1/1994 on local finance, <http://bit.ly/2UYX0la>.

<sup>61</sup> Emmar Syria, "Holding Company in Aleppo Similar to Damascus al-Sham Holding" (in Arabic), 29 March 2019, <http://bit.ly/2H8gOB4>

<sup>62</sup> Mohamed Hanoura, "Implementation of 340 Projects" (in Arabic), *Tishreen*, 10 July 2019, <http://bit.ly/3cVdAPL>

<sup>63</sup> Article 20/F of law 15/2008.

<sup>64</sup> Art. 55 of Law 107/2011 on local administration. Several appointments of *mukhtars* by the City's Executive Office have been reported in the press since 2017.

<sup>65</sup> This interpretation is suggested by UrbAN-S, *Aleppo City Profile*, 24

<sup>66</sup> Art. 10/c of legislative decree 5/1982 on Urban Planning.

<sup>67</sup> Valérie Clerc, "Sustainable Urban Development and Informal Settlements in Damascus: the Evolution of Paradigms and Contradictory Reforms" (in French), in *Expérimenter la "Ville Durable" au Sud de la Méditerranée, Chercheurs et Professionnels en Dialogue*, ed. Barthel P.-A. and Zaki L. (Paris : Éditions de l'Aube, Collection Villes et territoires, 2011), 6, <http://bit.ly/37fmqUA>



## 2.2. Profiles of Some Figures in Key Positions in the Local Administration

The governor and the head of Aleppo City Council have developed different networks in line with their profiles. The governor has a security profile and experience in Aleppo security issues while the head of the city council is an engineer with a sound understanding of urban and housing issues. Hussein Diab was appointed governor in September 2016 by presidential decree. His understanding of Aleppo city is based on a security perspective as he held positions within the internal security forces and worked at the Criminal Security Branch in Aleppo for eleven years. A native of Zabadani in Rural Damascus governorate, he also headed the Criminal Security Branch in Damascus and Quneitra. By contrast, Maad al-Madlaji was elected president of the city council and head of its executive bureau in October 2018 and had spent his career in the Ministry of Housing in leadership positions. On the eve of his election, he occupied the post of director of cooperative housing in this ministry, after having been director of housing and construction and director of the GCEC. He also teaches at the University of Aleppo. Other people combine positions at the governorate and city levels. Fadhl Mahna, director of Aleppo Governorate Technical Services, is also a member of the executive bureau of Aleppo City Council in charge of buildings, roads, the water and sanitation sector, maintenance and implementation.

The government's strategy to reconstruct its capacity also involves the appointment to key positions of technical specialists with solid experience in city administration and with local players. Two profiles can be identified in this regard, that of the attaché to the MoLA and that of the Director of Aleppo City.

The appointment of Waddah Qatmawi, an engineer in the Aleppo City Council administration, to the post of attaché to the MoLA by presidential decree in March 2017<sup>68</sup> may be interpreted as a means to reconstruct networks between the local and central administration levels. Qatmawi has developed a sound understanding of Aleppo's local networks and social fabric and expertise in the urban legal framework through several positions. As director of the expropriation department in 2009,<sup>69</sup> Qatmawi participated in an international cooperation project on informal settlements run with the German cooperation agency GIZ. As director of the technical affairs department of Aleppo City Council (a key department) from 2011 to 2016, he participated in the modification of the Aleppo master plan adopted in 2012.<sup>70</sup> As a member of the General Assembly of the Union of Engineers, in 2014 he belonged to a working group that proposed to apply Legislative Decree 66/2012 to reconstruction in Aleppo.<sup>71</sup> In December 2016 Qatmawi was dismissed by the MoLA for corruption<sup>72</sup> but was appointed attaché to the same Minister a few months later, most probably due to his experience and his networks of influence in the city. This nomination created a direct link between the ministry and the city council.

The Director of Aleppo City is another key position. Nadim Mamduh Rahmun, who is also an engineer, was appointed to this position on 10 December 2016. He had several positions within the Old City Directorate between 2002 and 2016 and was part of the team planning reconstruction work

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<sup>68</sup> Samidon, "President Bashar al-Assad Appoints by Decree Mohamed Waddah Qatmawi Assistant to the Minister of Local Administration" (in Arabic), 14 March 2017, <http://bit.ly/39XqyuK>

<sup>69</sup> Insan online, "Treating Aleppo Informal Settlements to Accommodate 40% of the Population" (in Arabic), 7 July 2009, <http://bit.ly/2sKt14a>

<sup>70</sup> Al-Thawra, "After Delaying Seven Years, the Master Plan of Aleppo City Came to Light" (in Arabic), 7 June 2011, <http://bit.ly/2ScNekD>

<sup>71</sup> Ayman Duri, "A Draft Decree for the Reconstruction of Aleppo" (in Arabic), *Dampress*, 6 February 2015, <http://bit.ly/2REmw2p>

<sup>72</sup> Hashatgsyria, "The Minister of Local Administration Issues a Decision Dismissing Eight Directors from Aleppo City Council Who Were Heading the Most Corrupt Directorates" (in Arabic), 10 December 2016, <http://bit.ly/35G54QA>

and creating the Emergency Response Plan.<sup>73</sup> In his new position, he is responsible for preparing the city council's agenda and for coordinating with the governorate. His appointment by the MoLA directly provides it with a useful lever within the city local administration.

### 2.3. The Mobilisation of Local Actors Through Contracts

In the framework of reconstruction, the local administration is able to contract with public companies and mobilise other local stakeholders. Involving local stakeholders, including competing ones, in meetings contributes to building networks, but within a restricted agreed forum. It is also instrumental in creating a shared discourse on economic deregulation in parallel with the collusion between the public and the private sectors.

Besides the GCEC, the Establishment of Military Construction and the Establishment of Military Housing, which are both linked to the Ministry of Defence, are under contract with the city council to implement the ERP and public projects in the master plan. The Establishment of Military Housing is frequently quoted by the press as the prime contractor for Aleppo city projects as it wins the most tenders.<sup>74</sup> Notably, it is responsible for the development of al-Ramousse district, clearing operations and even street paving.<sup>75</sup> It is also the prime contractor for the demolition of several buildings deemed dangerous in the al-Haidariyya district.<sup>76</sup> The Establishment of Military Construction is also regularly cited as the prime contractor to demolish buildings in al-Haidariyya,<sup>77</sup> open the main roads and tarmac them, and carry out repairs to the main street.<sup>78</sup> Other institutional actors are involved in the implementation of the City's mandate through contracts, such as the Establishments of Water, Electricity, Sanitation and Telephone and the Roads and Bridges Public Company.<sup>79</sup>

Moreover, the Union of Engineers, the Faculty of Architecture of the University of Aleppo and the Chambers of Commerce and Industry are all attending meetings with the authorities to discuss reconstruction perspectives and cooperation agreements. In September 2016, the Union of Engineers and Aleppo City Council signed a memorandum of understanding which entrusts the Union with several development studies. In March 2017, the Faculty of Planning of the University of Aleppo and the city council organised a joint workshop on the treatment of informal settlements under the patronage of Aleppo's Governor.

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<sup>73</sup> In the Old City Directorate, he was the head of the maintenance department (2002-2006), then deputy-director of the Directorate (2006-2010) and then director (2012-2016). During this last mandate, he contributed to rebuilding the digital archives of the Old City. "Engineer Nadim Rahman Appointed Director of Aleppo" (in Arabic), Facebook, 15 December 2016, <http://bit.ly/2swHszw>

<sup>74</sup> Halabtoday.net, "Tender for the Rehabilitation of an Eastern Neighbourhood of Aleppo" (in Arabic), 15 May 2019, <http://bit.ly/33o35jW>

<sup>75</sup> Maan al-Ghadri, "Waiting to Move al-Hal Market to its New Location" (in Arabic), *al-Shahba*, 4 September 2019, <http://bit.ly/2waL38u>; ORTAS, "Continual Efforts to Clear the Rubble and Buildings That Threaten Public Safety in the Liberated Neighbourhoods of Aleppo" (in Arabic), 18 August 2019, <http://bit.ly/34ZSr1D>; al-Jamahir, "Extensive Cleaning Campaign in al-Marjeh Neighbourhood and Volunteer Activity in al-Furqan Park" (in Arabic), 5 May 2019, <http://bit.ly/2EUFA6x>

<sup>76</sup> Halabtodaytv.net, "The Regime Destroys Buildings in the City of Aleppo Because Its Owners are from the Free Army" (in Arabic), 30 April 2019, <http://bit.ly/2UnzjHZ>

<sup>77</sup> Aleppo City Council, "The Head of Aleppo City Council Inspects al-Haidariyya" (in Arabic), Facebook, 22 December 2018, <http://bit.ly/2PztXHc>

<sup>78</sup> Ministry of Water Resources, "Engineer Arnous Inspects the Rubble Recycling Project."

<sup>79</sup> Mobile News Network, "Aleppo City Council Orders to Remove Building Violations" (in Arabic) *Facebook*, 24 April 2019, <http://bit.ly/2SuALsK>. See also Damascus News Network, "Continual Efforts to Remove Rubble and Buildings that Threaten Public Safety in Aleppo Neighbourhoods" (in Arabic), 18 August 2019, <http://bit.ly/2TadQmm>

### 3. Reconstruction as a Battle for Influence: Authority vs Money

Despite the government's efforts to re-assert central power in decision-making on reconstruction processes, implementation discourse and practices are being shaped by interactions between the private and the public sectors. The reconstruction of informal settlements as real-estate development areas under law 15/2008 is illustrative of the private sector's growing role in influencing official decision-making. Progress in such projects has been undermined by ongoing discussions with real-estate development companies to modify law 15/2008 and deregulate the sector since (at least) mid-2018.

#### 3.1. Informal Settlements as Sites of Real-Estate Development

Technically, an informal settlement is acknowledged by an administrative order of the Executive Bureau of the Governorate after delimitation by local authorities. This qualification allows the application of specific laws on regularisation, planning and urban development, including Law 15/2008 on real-estate development.

The number of informal settlements in Aleppo has evolved mainly as a result of mergers. A GIZ enumeration in 2009 reported 28 informal settlements, whereas the Regional Planning Commission (RPC) reported 22 in 2013 and the MoLA 26 in 2018.

**Figure 3. Informal Settlement Figures**

	<b>Numbers of informal settlements</b>	<b>Population</b>	<b>Surface</b>
GIZ-Aleppo City Council (2009)	28	1.1 million	
Regional Planning Commission (2013)	22	865,000	33.20 km <sup>2</sup>
Aleppo City Council (2017)	23	-	29.05 km <sup>2</sup>
Ministry of Local Administration (2018)	26	-	-

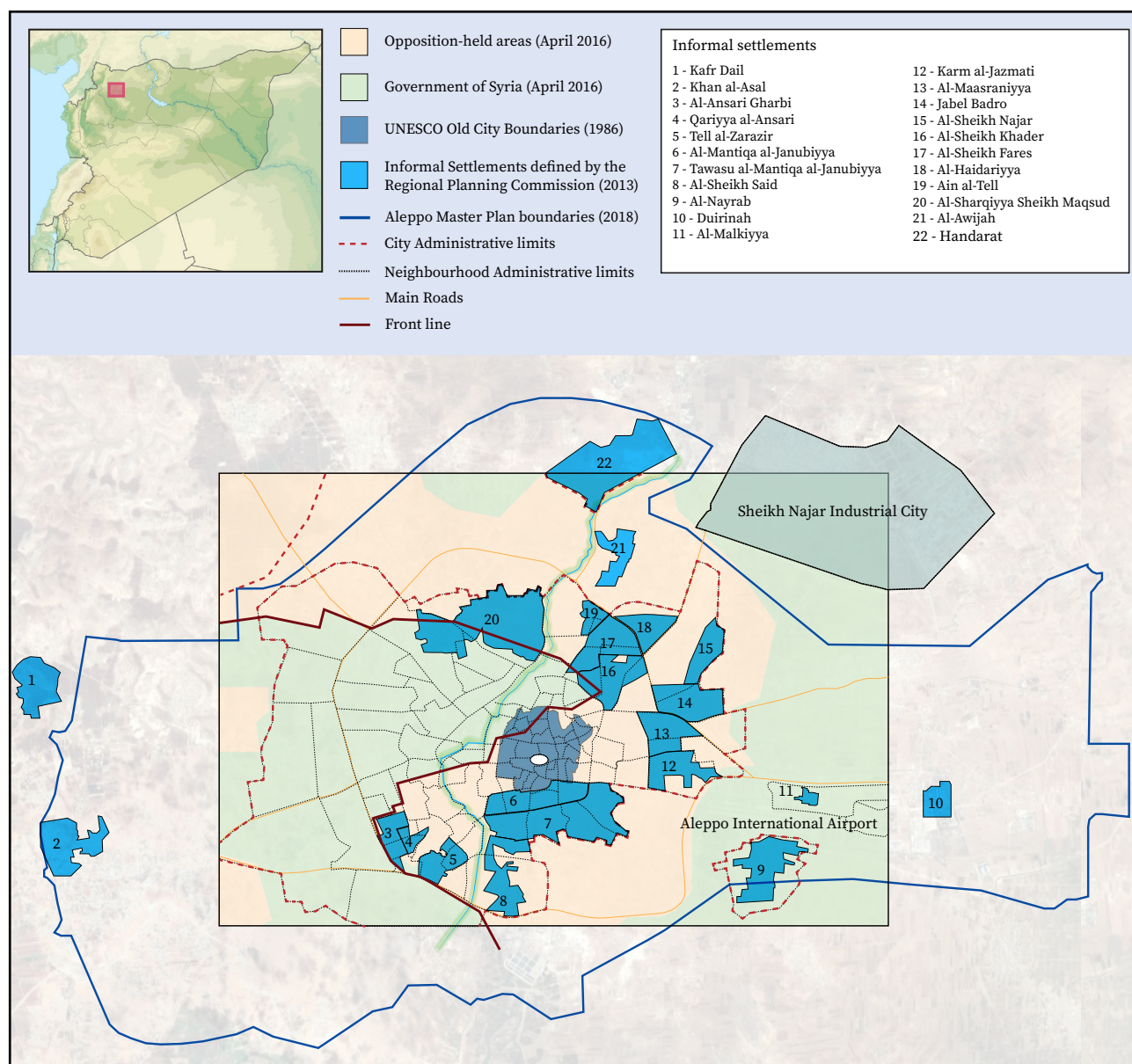
Source: Compiled by the author<sup>80</sup>

The demarcation of the 22 informal settlements identified by the RPC in 2013 is illustrated in a map attached to the National Plan for Informal Settlements.<sup>81</sup> Overlaying this map with those of the Old City (in its UNESCO boundaries) and the administrative districts (Map 2) shows that neighbourhoods referred to as informal settlements in everyday language may not be defined as such technically. Additionally, informal settlements may span several administrative districts. For example, the informal settlement of al-Mantiqa al-Janubiyya includes al-Fardus, Bab al-Maqam and parts of al-Asileh and Muhamed Bek districts, whereas part of al-Sukkari district is included in the Tell al-Zarazir informal settlement.

<sup>80</sup> GIZ and Aleppo City Council, "Aleppo Informal Settlements" (in Arabic), 2009, <http://bit.ly/2wRz2oo>; Regional Planning Commission, "The National Plan for Informal Settlements" (in Arabic), 2013, <http://bit.ly/2vqH0EL>; Aleppo City Council, "Workshop to Discuss Aleppo Informal Settlements" (in Arabic), Facebook, 8 Mars 2017, <http://bit.ly/36IJN9I>; MoLA website, "Under the Direction of President al-Assad ... A Government Delegation Headed by the Engineer Visits Aleppo."

<sup>81</sup> Regional Planning Commission, "The National Plan for Informal Settlements"

## Map 2. Informal Settlements in Aleppo



Source: The author. Graphic designer: Laura Pigneri, January 2020.

The issue of informal settlements has been discussed in Syria for several decades.<sup>82</sup> Upgrading and developing them has been the subject of various policies. Designating them for real estate development under law 15/2008, which entails demolition and reconstruction rather than up-grading,<sup>83</sup> has been discussed since 2008. The 11th five-year plan for the housing sector (2011-2015) aimed to address 20% of all the informal settlements in Syria and to start applying law 15/2008.<sup>84</sup> For Aleppo, the development of al-Haidariyya and Tell al-Zarzir under law 15/2008 was endorsed by the Prime Minister in 2010.

In 2013, the RPC reclassified 157 informal settlements – including 22 in Aleppo – for real-estate development. Four years later in May 2017, the reclassification of Aleppo’s informal settlements

<sup>82</sup> Law 44/1960 on illegal housing.

<sup>83</sup> Valérie Clerc, “Informal Settlements in the Syrian Conflict: Urban Planning as a Weapon,” *Built Environment*, 40/1 (2014), 34-51, <http://bit.ly/2TjRM91>

<sup>84</sup> General Organisation for Housing, “The Eleventh Five-Year Plan for the Housing Sector (2011-2015)” (in Arabic), <http://bit.ly/2VAQIV6>



was discussed case by case.<sup>85</sup> The RPC's proposal to requalify all the informal settlements might not be fully followed as Law 23/2015 on subdivision by owners may apply in Karm al-Jazmati, al-Mantiqa al-Janubiyya, and possibly Jabel Badro.<sup>86</sup> Public works have started to repair public infrastructure in the al-Fardous district included in the informal al-Mantiqa al-Janubiyya settlement.<sup>87</sup>

Law 15 was passed in 2008 to regulate the real estate development sector and encourage investment in the framework of public-private partnerships.<sup>88</sup> It thus presented an alternative to development law 9/1974 and the urban extension laws (law 60/1979 modified by law 26/2000), which are now repealed and replaced by law 23/2015 and law 10/2018. Although presented as a liberalisation law, it may instead favour collusion between power holders and development companies by establishing an accreditation system.<sup>89</sup> Furthermore, the government maintains control over the real estate development sector by only designating development areas by order of the Prime Minister on proposals by the GCDRI.

According to the 2018 GCDRI annual report, eight of the fifty-six accredited private companies are registered in Aleppo. A ninth was accredited in 2019. Six public companies are also licensed, together with foreign ones.<sup>90</sup>

**Figure 4. Real-Estate Development Companies in Aleppo**

Name	Capital (in million SYP)	Owner
Al-Qalaa Company	50	Fares al-Shahabi
Qurtoba Company for Building	50	Mohamed Walid Ghazal
Catalunya Company	50	Izâm Qassem al-Hassan
Qaterji Company	50	Hussam Ahmed Qaterji
Thika Company	50	Abdel Fattah Mohamed Amin Sabbagh
Syrian Gulf Company for Development and Real Estate Investment	50 (49% foreign funds)	-
Nawai Company	50	-
Totol Company for Real-Estate Development and Investment	50	Mohammed Jassim al-Mousa
Enshaa Company		-

Source: The author. Compilation of data from the GCDRI and media<sup>91</sup>

<sup>85</sup> Law 15/2008 was also proposed to be applied in al-Ansari Gharbi and Ashrafiyya (Beni Zeid), Jabel Badro, al-Awijah, Khan al-Asal, al-Malkiyya, al-Maasraniyya, Duirinah, Ain al-Tell, Handarat, Kafr Dail and al-Nayrab. See GCDRI, *Annual Report*, (in Arabic), 2018, 36, <http://bit.ly/38bHKf3>; Mahmoud Saleh, "There is no Prejudice to the Heritage Markets ... Madlaji for "al-Watan": Informal Housing and Settlements will not Remain in Aleppo ... after 15 years!" (in Arabic), *al-Watan*, 23 September 2019, <http://bit.ly/387zo79>; Hana Ghanem, "Real Estate Development Reeling Between Money Owners and Decision Makers" (in Arabic), *Tishreen newspaper*, 3 October 2018, <http://bit.ly/2vm5QW6>

<sup>86</sup> Prime Minister's website, "The Continued Restoration of Infrastructure and Services in Aleppo."

<sup>87</sup> SANA, "Continuous Efforts to Rehabilitate the Infrastructure Affected by Terrorism in Aleppo" (in Arabic), 12 June 2019, <http://bit.ly/2Wo2Fsl>

<sup>88</sup> Wakely and Abdul Wahab, "Informal Land and Housing Markets in Aleppo," 43.

<sup>89</sup> Articles 6/E, 17 and 18/C of law 15/2008.

<sup>90</sup> GCDRI, *Annual Report*, 2018, 39. See also Syrian-Chinese Business Council, "Establishing Catalonia Real Estate Development Company in Aleppo" (in Arabic), 23 July 2019, <http://bit.ly/2GQ83LM>

<sup>91</sup> GCDRI website, <http://bit.ly/2INkuse>

At least three of the registered companies are owned by influential financial and political figures. This shows how the public and private sectors are intertwined, and more precisely how public institutions are serving the interests of private actors close to the regime. Hussam al-Qaterji, a member of the People's Assembly since 2016, belongs to a family which has built close ties with the security apparatus. In January 2020, Bashar al-Assad ratified laws which grant three contracts to the Qaterji brothers and give them a strategic role in Syria's oil distribution sector.<sup>92</sup> Fares al-Shahabi, an important Aleppo businessman and President of Aleppo Chamber of Industry and the Union of Industry Chambers, has also developed growing political and economic influence in the country. He obtained accreditation for his real-estate company, al-Qalaa, from the Ministry of Internal Trade as early as July 2017 after he was slated to become Prime Minister in 2016.<sup>93</sup> Elected to the People's Assembly in 2012 and 2016, he became a member of the Advisory Board to the Prime Minister's Office in 2019.<sup>94</sup> Mohamed Walid Ghazal, owner of the Qurtoba Company for Building, was Minister of Housing and Environment in the government established in 2014. He had held various positions in the Establishments of Military Housing and Construction. He was appointed head of the Engineers' Union branch in Aleppo and then of the Union in Syria and was elected a member of the People's Assembly in 2007.<sup>95</sup>

### **3.2. Informal Settlements as Tools in the Battle for Influence: The Case of al-Haidariyya**

According to the head of the GCDRI, the development of al-Haidariyya is intended to be a model for reconstruction reproducible in other neighbourhoods. However, despite official calls, it has not yet attracted the expected interest from investors.

In February 2019, the city council started demolishing buildings and restoring infrastructure and main roads in al-Haidariyya after evicting its residents. Public works were carried out by the Military Construction Establishment in close coordination with the city council and the GCDRI.<sup>96</sup> Technical, legal and financial specifications were developed, and a digital map was uploaded. The main streets were opened. Ultimately, part of the district (118 hectares) was divided in three zones to be developed by real-estate companies.<sup>97</sup> Confirming the government's political will, the inter-ministerial committee responsible for reconstruction work visited al-Haidariyya in July 2019.<sup>98</sup>

Praising the development of this district as a key government project in the reconstruction of Aleppo is, however, questionable since the area was reclassified for real-estate development by order of the Prime Minister ten years ago. The need to demolish and rebuild the area with private sector investments was then contested by experts as the neighbourhood was well-built with medium density.<sup>99</sup> In addition, the level of damage (less than 20%, according to UNITAR-UNOSAT) did not necessarily require the demolition of the entire neighbourhood. The decision to reconstruct al-Haidariyya under law 15/2008 was perceived as risking destroying communities with no up-grading content or effect on the city's affordable housing stock. The decision may have been due to the attractiveness of the

<sup>92</sup> Iqtisad, "Qaterji is Officially Obligated to Build Two Oil Refineries in Syria" (in Arabic), 11 January 2020, <http://bit.ly/2U58UOJ>

<sup>93</sup> Al-Alam.tv, "Who is Fares Shihabi, the Candidate for the Position of Prime Minister of Syria?" (in Arabic), 12 June 2016, <http://bit.ly/38jocFy>

<sup>94</sup> Al-Iqtisadi, "Fares al-Shahabi" (in Arabic), <http://bit.ly/2vnMeRm>

<sup>95</sup> Al-Iqtisadi, "Mohamed Walid Ghazal" (in Arabic), <http://bit.ly/37d1kX6>

<sup>96</sup> GCDRI, Annual Report, 2018, 14.

<sup>97</sup> Faiz Ali Nabhan, "Mr. Director of the General Authority for Real Estate Development and Investment Explains to al-Areen News the Mechanisms for Solving the Problems of Informal Housing in Syria" (in Arabic), *al-Areen-news*, 27 October 2018, <http://bit.ly/36GgVyc>

<sup>98</sup> Aleppo Governorate website, "The Ministerial Committee Completes its Tour in Aleppo for the Second Day in a Row" (in Arabic), 16 December 2019, <http://bit.ly/2RE7UI4>

<sup>99</sup> Wakely and Abdul Wahab, "Informal Land and Housing Markets in Aleppo," 2010, 44.

area to private sector commercial development. It also reflects the government's objective since 2010 to build new neighbourhoods in place of former informal settlements. The public authorities seem to be using the fact that the land belongs to the city council to pursue this option.

The development of al-Haidariyya could indeed benefit the city council as it owns 100% of the land there following waves of expropriations since the 1970s.<sup>100</sup> Law 15/2008 provides that compensation is only due to the occupants of private land (in the form of an allowance or substitute housing). The public authorities justify not paying compensation to residents on public land with the fact that it was already paid at the time of expropriation. In several press statements, Maad al-Madlaji, head of Aleppo City Council, has underlined the fact that the land belongs to the municipality and that illegally constructed buildings can be demolished.<sup>101</sup>

However, ambiguity on the issue of compensation is maintained politically. In May 2018, the Minister of Housing asserted that people who built on public land would be resettled in substitute housing in the area once it was developed.<sup>102</sup> However, the Aleppo City Council Director of Technical Affairs confirmed in November 2018 that law 15/2008 does not provide for compensation or substitute housing for occupants of public land. He clarified that negotiations were nevertheless being held at the ministerial level so that two years of rent could be paid to certain residents on condition that the number of applicants was limited to a couple of hundred.<sup>103</sup> As an indication, the population of al-Haidariyya in 2009 was 32,000.<sup>104</sup> In August 2019, the director of the GCDRI declared that substitute housing will be provided by real estate development companies.<sup>105</sup> He then cited a provision from the administrative instructions in Law 15/2008, but did not specify that this provision only applies to owners of private land.<sup>106</sup>

So far, the reconstruction of al-Haidariyya has suffered from a lack of investment by real estate companies. None of the accredited companies responded to the two tenders launched by Aleppo City Council. The first one was opened on 16 October 2018 for two months and a second in February 2019 when the city council started demolishing buildings and restoring infrastructure and main roads.<sup>107</sup> At least two main factors may explain this situation. First, real estate companies seem to be avoiding investing in the eastern part of the city as the profitability is lower than in the western part. Second, at the time of writing in March 2020 the discussions to modify law 15/2008 are still ongoing in Parliament. The real-estate development companies are mainly requesting better financial incentives and more deregulation,<sup>108</sup> total exemption from taxes and duties (especially customs) and delinking of the law on real-estate developers from that on contractors.

Pushing forward deregulation of the real-estate sector – which since the 2000s has been a major sector for rapid capital accumulation in Syria – has been a general feature of the economic policy promoted

<sup>100</sup> Al-Jamahir, "Order to Demolish 22 homes in Al-Haidariyya" (in Arabic), 14 June 2010, <http://bit.ly/2ThtrAE>.

<sup>101</sup> Aleppo City Council, "The Head of Aleppo City Council Inspects al-Haidariyya."

<sup>102</sup> Saleh Hamidi, "The Minister of Housing for 'al-Watan': Amending the Expropriation Law is not on the Table" (in Arabic), *al-Watan*, 13 May 2018, <http://bit.ly/2vqx10X>

<sup>103</sup> Maan al-Ghadri, "Aleppo Master Plan after Five Billion. Is the Government Move at the Level of the Event?" (in Arabic), *al-Shahba online*, 29 November 2018, <http://bit.ly/2TR5yA6>

<sup>104</sup> GIZ and Aleppo City Council, 2009, 72.

<sup>105</sup> Saleh Hamidi, "Homs to al-Watan: A Real Estate Development Project for Informal Housing in Aleppo Will be Launched Soon" (in Arabic), *al-Watan*, 20 August 2018, <http://bit.ly/2xISofV>

<sup>106</sup> Article 3/ First/ D of the instructions in law 15/2008.

<sup>107</sup> Maan al-Ghadri, "Real Estate Development Projects for Informal Settlement Areas Stumble (in Arabic), *al-Shahba*, 11 September 2019, <http://bit.ly/2ITV1O4>

<sup>108</sup> Al-Mashhad online "Revision of the Law on Real Estate Development Soon Under Discussion before the Parliament" (in Arabic), 10 February 2019, <http://bit.ly/2vvSKWr>. See also al-Iqtisadi, "A Draft Law Granting Wider Powers to Real Estate Developers in Syria" (in Arabic), 15 July 2018, <http://bit.ly/3cnQm4R>

by Bashar al-Assad to deepen liberalisation which could benefit his close associates. The pressure to deregulate the sector in Aleppo is still significant, including from officials. As early as February 2017, the director of the GCDRI and the Aleppo Governor stressed the need to provide an attractive environment for real-estate companies.<sup>109</sup> Three years later, private actors continue to have growing influence on public decisions, as real-estate companies are suspending their investments to obtain ever more flexible financial conditions.

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<sup>109</sup> Economy 2, “Real Estate Development Reveals the Areas that will be Restored in Aleppo” (in Arabic), 25 February 2017, <http://bit.ly/2ZAFqL4>

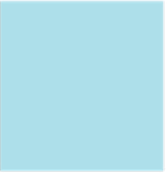


## Conclusion

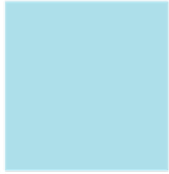
Aleppo's reconstruction planning shows a highly centralised approach with a limited number of actors. Restoration projects are gradually being adopted by an inter-ministerial committee under the Ministry of Local Administration. The role of the local administration is limited to implementing these projects, preparing studies to inform the central authorities and contracting public companies to remove rubble. Its subordination to central authorities is exacerbated by legal provisions regarding Aleppo City Council's budget and its dependency on government funds for reconstruction. The government can also reassert its control over the appointment of reliable figures to key positions in the local administration.

The lack of information on damage assessment and the criteria for selecting priorities, the applicable legal framework being on a case-by-case basis and the lack of transparency about the financial framework contribute to limiting debates to a restricted circle of decision-makers and selected partners. The latter include public establishments (notably, two main entities linked to the Ministry of Defence), the Union of Engineers and real-estate development companies owned by influential financial and political figures close to the inner circles of the regime.

The authorities' response indeed favours investors in the tourism, industrial and urban development sectors rather than the housing needs of the displaced population, which is also the poorest. The urban legal framework to guide restoration and development impacts the ability and willingness of the displaced population to return. No proper mechanisms have been established to identify and process housing and property rights. The development of informal settlements such as al-Haidariyya shows that the administration has targeted real-estate development companies' interests rather than residents' ones. These companies, however, have not yet responded to investment requests by the public authorities, and seem to be using their leverage to advocate for greater deregulation of the real-estate sector.



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