

Neoliberal Challenges and Practices of Urban Regeneration Projects in Istanbul

A. Erdem Erbas, Tansel Erbil

(Asst.Prof.Dr. A. Erdem Erbas, Mimar Sinan Fine Arts University, City and Regional Planning Department, Meclis-i Mebusan Cad. 34427 Findikli-Istanbul erdem@msgsu.edu.tr)

(Asst.Prof.Dr. Tansel Erbil, Mimar Sinan Fine Arts University, City and Regional Planning Department, Meclis-i Mebusan Cad. 34427 Findikli-Istanbul erbil@msgsu.edu.tr)

1 ABSTRACT

Like in many other developing countries under globalization and structural change processes, Turkey has experiencing great deal of changes in its urban structures for the last two decades. Among them urban regeneration is one of the highly debated planning issues in the last decade. In addition to major structural changes like integration of urban fringe to the core, de-industrialization, urban sprawl and re-invention of the city center as cultural domain; planning issues such as renewal of historical areas, disaster mitigation planning in risk prone zones, and re-development of brown field areas have put a complex agenda in urban planning practice.

In the recent decade, the central government in Turkey has issued several legal planning tools to enable urban regeneration projects in Istanbul and in many other cities. However, in many cases these legal arrangements were acted as ad-hoc solutions for case-specific urban regeneration projects and the empowerment of some central state organizations such as State Housing Authority (TOKI) and Privatization Authority (OIB) in plan making process have caused fragmentation in urban planning process in Turkey.

In this paper some selected urban regeneration cases will be scrutinized in order to explain the current actors and their roles in plan making process. An assessment will be made on the effects of Neo-liberal approaches to current planning issues in Istanbul and a discussion will follow about the possible outcomes of fragmentation in urban planning practices.

2 CONCEPT OF URBAN TRANSFORMATION

During recent years, like in many other countries, there have been several discussions in Turkey on the phenomenon of urban transformation. Urban transformation varies between nations with respect to proposed vision, objective, strategies and employed methods. The focal point of discussions is that urban transformation cannot be restricted with the transformation of a physical space but needs to embody cultural, social, economical and environmental aspects as well.

Within this framework urban transformation is acknowledged to be a comprehensive vision and action that aims to provide permanent solutions for the economical, physical, social and environmental urban problems witnessed in a transformed region (Thomas, 2003).

Urban transformation is basically conducted to reintegrate outdated, battered, bedraggled, nonfunctional and economically worn-out regions within the large texture of city. It refers to the whole set of strategies and actions followed to improve economical, social, physical and environmental urban conditions via implementing comprehensive and integrated approaches.

In a different saying, it implies re-improvement and regeneration of an outdated economical activity, revitalizing of a nonoperational social function; in ostracized regions enabling reintegration with larger society; reestablishing the harmony in regions where environmental quality or balance is lost (Roberts, 2000).

2.1 Concept of Urban Transformation during post-1980

A closer look at the historical development of urban transformation reveals that the breaking point of this phenomenon coincides with the 1980s. A definition of the phenomenon of urban transformation calls for a better grasp of globalization, competition and sustainability concepts that collectively impacted planning strategy as of the 1980s.

Having existed and acknowledged before the 1980s urban transformation first referred to transformation of unsanitary urban conditions of laborers in major European cities particularly after the Industrial Revolution as well as physical transformation of cities wrecked in the aftermath of the First and Second World Wars. It was perceived as rehabilitation of unsanitary urban conditions or restructuring of battered urban textures. In

the preceding years of 1980s urban transformation in the narrowest sense implied a transformation of physical space; however in subsequent years it gained new dimensions by virtue of changes from traditional marketing strategy towards strategic spatial planning.

Context and meaning of transformation changed in a way to encompass transition to information technologies, urban competition, sustainability, governance, social facts, social belonging, localness and ecological features.

As a consequence, phenomenon of urban transformation initiated by Industrial Revolution and extended till the 1980s was defined as reconsidering physical battering caused in urban land by rapid urbanization, spatial change in the city, population density in urban lands and relevant factors. However in the aftermath of 1980s it has been dealt within a conceptual structure in which the union of physical, economical, social, environmental and technological relations has been questioned and transformation has been analyzed within the framework of this interrogation.

2.1.1 Different Dimensions of Urban Transformation

Urban transformation includes in itself four key dimensions which all complement one another; planning of physical space, social facts, economical features and legal/administrative structure. Physical space dimension relates to transportation connections of the region in which urban transformation is implemented, housing stock it preserves, technical substructure and social equipment capacities and environmental problems. Planning dimension involves spatial plan, development and change of transformation zone. Social dimension embodies access to public services such as health and education, crime, social exclusion, public and private sector partnership, participation of locals and volunteers. Economical dimension implies boosting the quantity and quality of employment opportunities and created added value in selected region and its vicinity (Kokturk, 2007). Legal/administrative dimension integrates structure of local decision mechanisms, relations with local community, participation of interest groups and actors playing role throughout the process.

2.1.2 Targets of Urban Transformation

By definition concept of transformation has effect on the structure of city and physical, environmental, social and economical future of urban settlers. Hence in all planning activities, a multidisciplinary approach that integrates sociologists, planners, architects, engineers, economists, legal practitioners, historians, landscape architects should be adopted. Treating qualified lands as merely transformation of physical space brings about the rise of problems throughout the implementation of project which in turn delays the completion of project or even causes an annulment.

From this point of view, urban transformation is required to be planned to serve five key objectives (Roberts, 2000).

A direct relation should be established between physical conditions of the city and social problems. One of the most influential factors in the dilapidation of urban lands is social deterioration or societal collapse. Urban transformation projects should prioritize the underlying reasons behind social deterioration and propose preventive suggestions against societal collapse.

Urban transformation should meet continuous, physical change need of many elements constituting urban texture. In other terms urban transformation project should enable re-improvement of urban components in accordance with new physical, social, environmental and infrastructural needs emerging in the rapidly enlarging texture of city.

It should hold a local economical development approach boosting urban welfare and life quality.

Aside from physical and social deterioration, one of the most significant reasons wrecking urban lands is the loss of economical vitality in these regions. Urban transformation projects are required to develop strategies that shall revitalize economical flourish in urban components that are in the form of physical and social wrack. In these projects employment opportunities and increase in added value should be sine qua non condition to prioritize.

Strategies that enable the most effective use of urban lands and prevent undesired urban sprawl should be implemented. Urban growth should promote compact city.

Urban transformation projects should possess one or several of these targets in accordance with the problems, threats, opportunities and potentials of particular urban region.

2.2 Relation between Urban Transformation and Urban Projects

Activities directed towards the actualization of targets identified with urban transformation should be treated as a process. In that case the process in urban transformation projects are;

in line with Urban Development Vision

within the framework of Strategic Spatial Planning approaches

identified by Urban Project

defined by Implementation Program and Tools.

What is the focal point in present research is that urban projects are crucial tools in urban transformation projects. However it would be a misleading and incorrect approach to claim that phenomenon of urban project is merely a reorganization of physical space. It is required to integrate with the project throughout different stages the multi disciplines that encompass different dimensions of urban transformation. Urban projects mostly focus on urban components that have been discriminated by industrial city and become nonfunctional under current conditions. Urban projects also can take stage in a wide range of domains such as recovery of old industrial and port areas in idle status; building of techno-parks, amusement parks, housing zones demanding modern technological infrastructure and international capital; polishing old urban housing zones by adding new prestige. Hence in urban interventions, urban projects act as crucial planning and design tools. Urban components constituting the subject of urban projects can possess “public space” or “private space” quality. Urban projects of which main objects are public and private space can thus initiate with itself a process of urban transformation. Therefore it is a must not to reduce urban projects to merely physical space but handle it collectively with the other components of space.

In its modern sense concept of urban transformation refers to a comprehensive restructuring approach directed towards overcoming social, economical and spatial wracks triggered in cities by the dynamics of post-Fordist era in particular and problems of post industrial period developmental stages (Sökmen, 2003). What deserves particular attention at this point is the kind of planning approach urban transformation concept and subsequent urban project approach are associated with.

2.2.1 Implementation Forms of Urban Transformation

Urban transformation is a wide-scope concept including in itself the implementations aimed towards renewal of present urban structure. Different forms of implementation enclosed in urban transformation are as outlined below:

Renewal: Urban renewal activity takes stage according to the needs of urban spaces having passed to deterioration and wrecking process because of the development and change of urban functions and socio-economic structuring. Renewal is defined as restructuring after demolishing some or all buildings in areas of which living and sanitary conditions cannot be improved because of both settlement design and status of existing structures.

Urban Renaissance: Urban renaissance basically focuses on the process witnessed in the transformation of London in Britain. It generally advocates establishing harmony amidst economical competition, minimizing social exclusion and environmental protection (Gibson&Kocabas, 2001).

Rehabilitation: Rehabilitation is rehabilitating via rearrangement a wrecked building or set of buildings of which density has increased due to several recent additions and modifications but of which original quality is still preserved. It implies reopening to use of old urban texture and wreckage lands by making use of partial renewal.

Preservation-conservation: Preventing the loss of physical structure that reflects a society’s ancient social and economic conditions and cultural values because of the experienced changes and developments (Erden, 2003). Union of urban texture with modern life is defined as rehabilitating cultural assets by virtue of economical and functional conditions beneficial for society. The concept involves two kinds of approaches; preservation with the original quality or conservation with limited changes.

Revitalization: Urban revitalization is by eliminating social, economical and physical impacts triggering deterioration in urban regions passing to period of collapse to re-strengthen and revitalize the land via reintegration with the urban system.

Redevelopment: Developing within a new planning design the urban textures of which economical and structural qualities are too deteriorated to conduct renewal.

Improvement: A public action type aimed towards unplanned development of a whole or part of city; manipulating development to gain societal benefit and establish relation between functions and land use.

Clearance: Defined as removal of unsanitary conditions in houses and other buildings within regions in which low-income groups are densely populated. The process is described as “Slum-Clearance” in Western world.

Brownfield development: Joining new activities and structures into an existing structure in any region.

Refurbishment: Indicates revitalization of historical lands by using landscape components and urban furniture that play crucial role in the acquisition of urban image and character.

Aside from above defined implementation forms of urban transformation projects, there are several implementation forms known by different names or formed by the combination of several of the ones above. Selection of implementation forms within an urban transformation project varies with respect to physical, social and economic structure of particular region and legal framework effective on the treatment of particular issue.

3 URBAN TRANSFORMATION PROJECTS IN TURKEY

Urban transformation phenomenon in Turkey though bears similarities to developed Western states, also exhibits substantial divergences which stem from economical and political facts surrounding Turkey as well as historical past and social and cultural structure of the nation.

In the West a set of intervention methods has been developed so as to deal with a variety of urban transformation problems. In Turkey on the other hand the most emphasized dimension in urban transformation is change of informally developing housing zones (slums etc.) (Türel 2005). In Turkey, State Housing Authority (TOKI) acts on behalf of general public during urban transformation processes and fuels the transformation in these domains. Presently TOKI is the most powerful and effective central government authority in urban transformation within Turkey. Other participating public actors are Ministry of Environment and Urban Planning, Ministry of Culture and Tourism and Municipalities. Additionally in recent years projects implemented by real-estate development agencies have been seated in the first rows on public agenda. In relation to the quality and location of urban transformation, international organizations and agencies such as UNESCO, ICOMOS can also play role in urban transformation projects within Turkey (Kocabas, 2006, Dincer&Enlil&Evren, 2009).

Modern cities in Turkey face several urban transformation problems ranging from developing earthquake-resistant urban spaces, conservation of natural, historical and cultural heritage, legalizing and rehabilitating informal and low quality of life in urban lands. In Turkey urban transformation is generally reduced to merely transformation of physical space thus social, economical and environmental dimensions of transformation have been neglected. In Turkey response to urban transformation problems have been, rather than political interventions within the scope of a definite plan and program, based on market conditions; ‘ad-hoc’ solutions of community; mutual interactions between central and local administrations.

In Turkey urban transformation projects implemented during post- 1980 in particular have received much criticism on accounts of being allegedly the kind of projects creating uncontrolled urban sprawl, deterioration of cultural, historical and natural assets, non-industrialization, ignoring environmental sustainability, reflecting non-local features, climbing social inequality, social exclusion and polarization, providing a limited spatial quality (Ercan, 2011).

3.1 Legal Dimension of Urban Transformation in Turkey

In Turkey, cities have been transformed in this framework of urbanization problems; however the introduction of urban renewal concept in urbanization and planning practice in Turkey coincides with the 1970s and its utilization as an implementation tool in planning corresponds to the 1980s.

Regulations and practices concerning urban transformation have for a long time been conducted within the framework of effective legislations and legal provisions (Genc, 2008). Therefore unlike Western states which adopted multi-dimensional, comprehensive political practices, techniques and methods, corporate and financial structure there have been ad-hoc solutions and practices that are nonrelated and developed by different administrative units only when a necessity emerged. In its current form it can be argued that there is a fragmented structuring within the relevant legislation.

In addition to these developments, fueled by EU membership process too, there have been major legal regulations involving urban transformation issue as of year 2000 in certain public administrative reforms. Amongst them the most fore grounded regulations are;

Date	Law No	Law Title* *(in abbreviated format)	Scope with respect to Urban Transformation
1966	775	Illegal Housing Prevention Law	Preventing unplanned structuring via illegal housing prevention
1984	2981	Law on Buildings Violating Construction and Illegal Housing Prevention Law	Indirect implementation of urban transformation projects via Improvement plan
1984	2985	Mass Housing Law	Regulations to meet housing demands
1985	3194	Construction Law	Regulations on Construction Plan preparation and approval
1994	4046	Privatization Law (Article 41)	Amendment in Article 9 of Construction Law, granting planning and approval authority to Privatization Administration
1997	4232	Privatization Law (Article 4)	Amendment in Article 9 of Construction Law,
2004	5104	North Ankara Transit Urban Transformation Project Law	Legal regulations on private project lands
2004	5162	Amendment in Mass Housing Law	Amendment in Article 4, in transformation lands granting planning and approval authority to TOKI
2004	5226	Amendment in Cultural and Natural Heritage Conservation Law	Definition of Renewal Land and renewal projects
2005	5393	Municipality Law	Pursuant to Article 73 of the Law urban transformation and development projects are approved.
2005	5366	Law on Battered Historical and Cultural Real Estate	Selecting the neighborhoods dominated with battered historical and cultural assets as renewal zones,
2010	5998	Amendment in Municipality Law	Amendment in Article 73, Scope of urban transformation and development project is widened.
2011	644	Body and Missions of the Ministry of Environment and Urbanism	Pursuant to Cabinet decree, authority to plan and approve for all the lands under the rule of central administration, authority to identify the procedures and principles concerning urban transformation practices
2012	6306	Law on Transforming Disaster Risk Zones & Regulation on implementation of Transforming Disaster Risk Zones	Identification, planning and setting implementation procedures for disaster risk zones, -Identification of Risk Buildings in an Earthquake Risk Report, -Pursuant to Cabinet Decree identification as risk zone

Table 1: In Turkey Major Legal Regulations involving Urban Transformation issue

Main factors influential in the emergence of legal regulations aimed so far to direct urban transformation in Turkey throughout historical process can be listed as below;

Illegal Housing Prevention Zones:

Squatter houses (illegal houses, slums) refer to the housing style addressing to low income groups of which residential demands could not be met through legal methods. In Turkey the system basically addressed to the former rural settlers that migrated to cities in the aftermath of rapid urbanization process witnessed in post Second World War era. In Istanbul, Illegal Housing Prevention Zones practices were developed in Sarıgöl – Yenidoğan and Tozkoparan districts by Municipalities of Gaziosmanpaşa and Güngören pursuant to 775 no Law in addition to Ayazma and Kayabaşı Mass Housing Zone applications within the borders of Başakşehir Municipality are the most significant samples. The objective of this law is to prevent unorganized public housing that emerge due to rapid urbanization on public urban lands and providing organized housing areas for the needy citizens via mass housing practices in the selected zones. Nonetheless the positive outcomes obtained by these practices have been confined to total urban development phenomenon witnessed in Turkey during the last four decades. In years squatter housing has turned into a way of grabbing advantage-though informally- from urban development rents thus owners of squatter houses rejected to be involved in such formal arrangements.

Renewal Zones:

In renewal zones proclaimed pursuant to 5366 no Law, the aim is to plan the neighborhoods in which historical and cultural assets are densely populated. Publicly known as Tarlabası Project, Sulukule Project, Fener Balat Project these projects are the leading examples of renewal lands within the borders of Istanbul. Basically these are the regions situated in city center and favored by middle and low income groups till recent times on accounts of their proximity to former industrial zones and its subsequent connection with city center afterwards. However the new objective is to renew these regions in accordance with non-industrialization phenomenon experienced gradually in the central zones in Istanbul and at the same parallel to the rediscovery of cultural, touristic and aesthetic identities in particular spots within city center. This legal regulation aiming to improve urban standards of particular zones through physical renewal and life quality of settlers failed to envisage an intervention with the accompanying social and economical processes. Consequently former inhabitants in the course of time migrated from their original settlements (gentrification) as they failed to adopt new economical and social conditions (Ergun, 2004; Uysal, 2012). In the course of time this movement has turned into a tool aiming to present for the taste of new urban middle class and global tourism investors through aestheticization of historical urban identity elements in particular regions reflecting historical identity of the city.

Cabinet Decree	Official Gazette No	Official Gazette Date	Renewal Land
2006/10172	26122	28.03.2006	Beyoğlu (Cezayir Blind and its vicinity, Tophane District, Galata Tower neighborhood, Beyoğlu Municipality Building and its vicinity, Bedrettin Neighborhood)
2006/10299	26147	22.04.2006	Fatih (Fatih – Kürkçübaşı Area Bulgurpalas, Atikmustafapaşa Neighborhoods, Fatih Balat Karabaş – Tahta Minare Neighborhoods, Hatice Sultan – Neslişah Neighborhoods)
2006/10455	26186	02.06.2006	Tuzla (Tuzla Köyiçi)
2006/10501	26206	22.06.2006	Eminönü (Süleymaniye, Hacıkadın, Kalenderhane, Mollahüsrev, Hoca Gıyaseddin, Sarıemir, Yavuz Sinan, Demirtaş Neighborhoods)
2006/10502	26207	23.06.2006	Zeytinburnu (Zeytinburnu Wall Isolation Band)
2006/10961	26318	13.10.2006	Fatih (Haraççı Kara Mehmet, Yalı, Küçük Mustafa Paşa, Hüsambey, Kasap İlyas, Hacı Hüseyin Ağa, İmrahor, Arpa Emine, Şeyh Resmi, Hatice Sultan, Ereğli, Kürkçübaşı, Cerrahpaşa, Davut Paşa, Atik Mustafa Paşa, Fatma Sultan, Çakırağa, Kırkçeşme, Neslişah, Hacı Evhaddin, Hacı Hamza, Canbaziye, Balat Karabaş, Tahta Minare, Abdi Subaşı, Veledi Karabaş, Beyazitağa, Molla Aşki, Sancaktar Hayrettin Neighborhoods)
2007/12375	26588	20.07.2007	Eminönü (Nişanca, Sultanahmet)
2007/12429	26597	29.07.2007	Fatih (On İmrahor Neighborhood 2384 No Block previous parcel no "11" has been changed as "L")
2007/12893	26737	25.12.2007	Eminönü (Old Bazaar and its Neighborhood)
2008/14349	27074	04.12.2008	Tuzla (İçmeler, Kamil Abduş Lake and its Neighborhood)
2010/405	27586	20.05.2010	Eyüp (Nişanca, Cezrikasım Neighborhoods)

Table 2: Renewal Lands Proclaimed in Istanbul

- Law on the Transformation of Disaster Risk Zones:

As a natural consequence of unorganized and uncontrolled urbanization natural disasters, mostly earthquakes, bring about even greater damages. In cities devastating effects of earthquakes become even deeper due to population boost, land use, defects in structures, insufficiency of substructure and services, environmental problems. Pursuant to 6306 no Law it has been aimed to consolidate risky structures or demolish then reconstruct an earthquake-resistant building (Ozcevik, 2007). As stipulated under this law loan supports are provided for the house owners in risky structures and contractor's in-charge.

A substantial portion of Turkey is situated in first degree seismic belt. As an outcome of the rapid urbanization process witnessed during the last four decades not only the emergence of comparatively low-quality urban settlements has been observed but also the emergence of zones with dense housing textures that are non-resistant to earthquakes. This legal regulation not only aims to minimize the losses in the face of a potential earthquake but also to improve unorganized settlements. Nonetheless at this point a market-centered political approach which ignores the fact that urban physical improvement's basic aim is to create safe urban lands -which in fact is the inherent mission of ruling government- is once again utilized. Thus through

reallocation of urban rents, settlement density in these zones is multiplied to create new demands of houses/trade zones. In that case urban land improvement which is theoretically true in legal regulation fails to be valid in practice. Because of market-centered approach selected as the tool, it remains under the shadow of problems concerning more permanent infrastructure and urban equipment zone standards that emerge parallel to the rise in urban density.

Cabinet Decree	Official Gazette Nr.	Official Gazette Date	Disaster Risk Zones
2012/3791	28434	7 October 2012	Esenler (Atışalan Airport and Atışalan Tuna Neighborhoods)
2012/3786	28457	4 November 2012	Beyoğlu (Örnektepe and Sütlüce Neighborhoods)
2012/3901	28457	4 November 2012	Beyoğlu (İstiklal Neighborhood)
2012/4125	28534	20 January 2013	Sarıyer (Fatih Sultan Mehmet Neighborhood -Armutlu)
2012/4163	28538	24 January 2013	Sarıyer (Çamlıtepe-Derbent Neighborhood)
2012/4160	28539	25 January 2013	Zeytinburnu (Sümer Neighborhood)
2012/4099	28540	26 January 2013	Gaziosmanpaşa (Merkez Neighborhood)
2013/4254	28551	06 February 2013	Sultangazi (Cumhuriyet Neighborhood)
2013/4258	28551	06 February 2013	Küçükçekmece (Kanarya Neighborhood)
2013/4257	28552	7 February 2013	Küçükçekmece (Fatih Neighborhood)

Table 3: Proclaimed Risk Zones in Istanbul

- Urban Transformation Zone

Pursuant to Article 73 of Municipality Law in proclaimed urban transformation zones such as Sumer Neighborhood (Zeytinburnu, Istanbul) the objective is to construct new living spaces fulfilling demands of modern way of life. However in the regulations sticking to Municipality Law municipality's approach on transformation zones is the determinant force.

- Regulations conducted within the scope of 3194 no Law

Master and tentative plans conducted within the scope of Construction Law and applications conducted via increasing structuring density in housing lands and introducing minimum parcel size are within this framework. Transformation phenomenon experienced in former villages that were once part of rural land but became an integrated part of urban settlement parallel to the expansion of cities is best illustrated in Mahmutbey Village (Bağcılar). Another critical zone on public agenda is Fikirtepe (Kadıköy) urban transformation project. Fikirtepe is situated in a location that was once in the periphery of city but became an integrated part of urban settlement and gained increasing land ratings. In addition there are various urban transformations depending on construction parceling plans. İstinye, Ferahevler (Sarıyer) can be given as an example to these zones but it should be analyzed in a more comprehensive study. Aside from housing transformation practices, in construction plans aimed towards industrial zones, resolutions for industrial transformation are also taken. An example for industrial zone transformation projects is Kartal Sub Center Urban Transformation Project designed by well known architect Zaha Hadid. This project also brought about with itself a good deal of public controversies.

- Zone-Specific Laws:

Urban transformation projects can also be implemented via laws released specific to transformation zone and scope. In addition to the earliest 2004-dated regulation released specific to city of Ankara, 2012-dated projects of Kazım Karabekir, İnkılap, Hekimbaşı Neighborhoods (Ümraniye, Istanbul) and Şerifali Farm (Ataşehir, Istanbul) are such laws. Aside from that as regards transformation of port areas regulations on Galata Port and Haydarpaşa Port are particularly noteworthy.

	Illegal Housing Prevention Zones	Renewal Zones	Disaster-Risky Zones	Urban Transformation Zones (Article 73)	3194 Nr. Law	Zone-Specific Law
Cabinet		•	•	•		•
Ministry of Environment and Urbanism	•		•		•	
Ministry of Culture and Tourism		•			•	
State Housing Authority- TOKI	•	•	•	•	•	•
Privatization Administration					•	•
Municipalities	•	•	•	•	•	•
Real Estate and Construction Companies & Emlak Housing	•	•	•	•	•	•

Table 4: In Turkey Major Actors in Urban Transformation Zones and Scope of Urban Transformation

As clearly evidenced in the tables above, after 2005 in particular, within the framework of neoliberal policies, a significant fragmentation has been experienced in urban planning system. One of the most significant indicators is that Cabinet which is the most authorized executive board of central government holds determinant role in the identification of urban transformation zones (Lovering&Turkmen, 2013). Another salient indicator is that compared to municipalities, central government agencies are more effective in urban transformation.

4 CONCLUSION

In the light of all above-given explanations and investigations it is feasible to outline key outputs and problems concerning urban transformation practices in Turkey as below;

- In Turkey there is an absence of definite legal framework outlining urban transformation. Instead, legal regulations are released merely specific to individual conditions. Provisions on regulations are identified pursuant to Cabinet Decree issued in Official Gazette that characterizes them as legal tools of central government. However, in many cases, there need to be location-specific regulations, which must developed by local governments to enable public support in urban areas with different problems.
- There are no clear-cut standards in the detection of Urban Transformation Zones. The scientific criteria followed in the identification of border are ambiguous. Political and economical choices play role in the emergence of this ambiguity.
- Other than the building regulations on earthquake prevention there are no definite implementation guidelines / implementation tools in the preparation of Urban transformation projects. There is no adequate and applicable planning tool concerning construction activities in built-up area.
- Urban transformation projects basically focus on the development of physical space and estimated rise in land value. Revenue sharing contracts of TOKI have become a component of project process in particular. However, as the main objects of urban renewal, risk reducing in earthquake zones and developing new urban public facilities to increase spatial standards were ignored in many cases to rise the value of urban land.

- In urban transformation process there is an approach that fails to fully integrate and even excludes current social structure in the transformation zone. Since urban transformation is treated outside the scope of issues such as taxing policies, it embodies features that rise social inequality.
- In the relocations of industrial areas etc. within urban transformation zones, the required socio-economic measures are missing. A process that particularly fails to get integrated with employment opportunities and created added value is experienced.
- The urban transformation process merely focuses on building generation and marketing; however in addition to buildings, employment opportunities, transportation, urban service areas should also be collectively treated.
- Central and local politics play dominant role in urban transformation projects. Central government authorities such as TOKI have gained further strength with legal regulations; thus local administrations constituted by elected representatives and bearing great potential in creating urban transformation models within a participatory process have fallen backwards.

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