

Comparative Analysis on Urban Land Delivery System and Housing Policy (The Case of Selected Countries)

Tekalign Arficho Haeso¹, Professor Xinhia Lu²

¹ (Ph.D. Student) Huazhong University of Science and Technology, School of Public Administration, Department of Land Resource Management, Wuhan 430074, China

²(Professor) College of public administration, Central China Normal University, Wuhan 430079,

Abstract: Ethiopia and several other developing countries all over the world are facing grave housing challenges to their citizens. The process of land acquisition and delivery comprises availability of unusable land, affordability of such land, ease of transaction with that land, and security of the owner's right as well as payment of fair compensation for the losers of land. The housing backlog and shortage has extended crisis from time to time. This study was conducted on: comparative analysis on urban land delivery systems and housing policy, the case of 10 selected countries from Asia, Latin America and Africa. Based on the general objective of the study, three specific research objectives were addressed using different documents and related report reviews. The researcher has used a comparative analysis and identified major challenges in the provision of affordable housing in the selected countries (purposively) based on its positive or negative impact to policy responses and then came up with way outs to address the acute shortage of housing in effective and efficient manner. The results of the study portrayed that even though several land delivery system (formal and informal) in the past as well as present time were accompanied to respond the problems of home ownership status of the citizens, but according to the findings of this study, the urban land delivery systems that the governments applied so far has not been brought to the end of the problems of urban land deliver and home ownership rights of the citizens. Therefore, because of poor land delivery and housing development strategies, citizens of many countries including Ethiopia were looking for a shelter constructed by different schemes and these schemes were poorly responding on housing problems and it has led to increasing informal settlement, land speculations by the wealthiest, bias of city development plan and high rate of housing shortages and rental costs are evident. It is largely because of the deficiency of land management and related legal frameworks as well as poor support on the above housing development schemes. Based on the findings of the study, the paper has forwarded recommendations that countries should think and do their home works on revising the land delivery system for housing purpose, strengthen institutional capacity of the municipalities, there should be clear land and housing related legal frameworks, there should be serious follow up and measurements on the high rate of corruption practices related to urban land and housing management, governments should think on different housing delivery schemes to respond on high rate of housing demand.

Keywords: land delivery system, home ownership, housing policy, legal frameworks

1. Introduction

Land is a fundamental resource in any society with far reaching socio-cultural and economic implication and its acquisition and delivery process is vital in achieving efficient and sustainable urban development (Williamson et al., 2010). The process of land acquisition and delivery comprises availability of unusable land, affordability of such land, ease of transaction with that land, and security of the owner's right as well as payment of fair compensation for the losers of land. That is why it is now increasingly being realized that economic development of any country depends on how efficiently land is acquired and distributed among citizenry and competing urban uses (Owoeye and Adedeji, 2015).

The greatest challenges to the governments and urban policy makers in the world are mainly associated with urban land acquisition and delivery (Toulmin, 2008) & (Durand-Lasserve, 2003). Most sub-Saharan countries employ state controlled expropriation as urban land acquisition method to supply land for urban housing and other development purposes although it is largely criticized for being inefficient in coping up with the demands imposed by rapid urbanization (Midheme and Moulaert, 2013).

National, regional and local governments have significant tasks and power for zoning land use and building codes that can meaningfully affect the accessibility of land supply. Nevertheless, local authorities have imperfect taxation power or capacity to build non-market housing (UN-Habitat, 2002; Whitehead and Scanlon, 2007). So far, it is the local governments that are nearby to the needs of low income residents and where local shortages of land for affordable housing are displayed in a very clear way.

The accessibility of land, alongside with a variety of occupancy types and passable tenure security, should be confirmed in advance of construction contained by a planned city development outline. Active land management information systems are mandatory to supply sufficient information for large-scale urban tasks, such as the supply of key infrastructure. Proper subdivision rules, allowing community-oriented urban design, are necessary to ensure acceptable provision of land for communal spaces, streets, other infrastructure, services and other public uses (UN HABITAT, 2012). Africa and Asia are urbanizing more rapidly

than other regions of the world. Regions that already have relatively high levels of urbanization are urbanizing at a slower pace, at less than 0.4 percent annually (UN Habitat, 2012).

About Ethiopia's case, the constitution stipulates that, land is owned by the people, giving the government an important role in land management and administration. In urban areas, the local governments act as the sole suppliers of land, currently through two means: direct allocation ('allotments') and auction. Till 2011, allocation through direct negotiations also existed. Despite the fact that, recent auctions in all cities without a doubt indicated high unmet effective demand for residential and commercial/industrial land, local governments continue using auctions only for a small fraction of the total land parcels allocated (GoE, 2010).

After having a look on the literatures and government reports about land and housing in Ethiopia, and going through some research works and international institutions official websites about land and housing problems, the researcher decided and motivated to study this urban housing dilemma and land taking system cases in Ethiopia through using the comparative analysis of different countries experiences. This is because, mostly when we are looking developing countries, still the issues of land delivery system and home ownership needs to be researched in different approaches and context, according to the ideologies, principles, and characteristics of each country. This was the initial problem upon which this study work has truly focused on. Based on the above understandings the researcher has developed the following general and specific objectives of the study.

The general objective of this paper was to understand and analyze the urban land delivery systems and housing policy of selected countries from Asia, Latin America and Africa.

Based on the above general objective, the following specific objectives were decided to be addressed using the comparative analysis. These were:

- i. To examine the experiences of countries on how they were delivering and managing urban land for housing development.
- ii. To analyze how the selected countries were addressing the land and housing shortages for their citizens.
- iii. To suggest possible implications and address the problems of urban land and housing in Ethiopia.

2. Contribution of the Paper

The findings of this comparative analysis research on the experiences of different selected countries (from Asia, Latin America and Africa) on the urban land delivery systems for housing development has aimed to address how countries are responding to the problems arise from the limited and scarce nature of land resource, specifically in making their citizens a home owners through different urban land delivery systems used and housing development schemes applied. As stated above, the aim of the study is not only to address the problems on the issues above, but also expected to provide more knowledge and understandings for different administrative bodies in Ethiopia whom are working on urban land development and management at country level based on the experiences of different selected countries from Asia, Latin America and Africa discussed below. This research work on comparative analysis has also recommended way outs for Ethiopia on the problems that faced the urban land delivery systems applied for housing developments.

3. Review of Related Literature

3.1 Demands of Urban Land for Housing

A United Nations study on land use in urban areas of developing countries underscored many problems when it observed the issues and these are: The demand for urban land is growing, yet the supply is limited. This situation radically increases land cost. It also distorts patterns of urban growth and development. Thus, this makes the urban infrastructure becomes more costly and inefficient, the institutions and facilities fail to provide adequate services to their populations (United Nations, 2012b), and Residential housing plays different roles in the society. It is an immense element in the inheritance and a source of personal wealth. It is a major sector in the national economy, a substantial consumer of investment funds and a large source of employment within the construction and building industries (Onibokun, 1985).

According to Dowell (1993), points out that the actual, effective demand of land by developers depends on: (1) what can be physically, legally, and economically built on the site; (2) the market value of developed land; (3) the development costs; and (4) sufficient return for the developer. Healey & Barrett (1990) argue that, besides being space where processes of production and consumption is done, the way in which land and property are "produced" and "consumed" enters into the processes of economic production and consumption. Land is expensive on an open market and developers pay substantial amounts of money to acquire access to that land (Bryson & Lombardi, 2009).

It is now accepted that, due to a variety of factors, informality is the predominant characteristic of urban growth and that a majority of urban residents, especially the poor, access property rights through transactions occurring outside state regulation and formal land markets". The informal land market has a large number of socially dominated land market transactions, where the supply and demand of land are mediated more by social relationships than by a financial logic. A study in South Africa has shown that although price or cost is still an issue, it is of secondary importance in the way people transact (Marx and Roysten, 2007).

3.2 Supply of Urban Land for Housing

In the periphery of most cities in Africa, the supply of customary land at reasonable commuting distance from cities is drying out. However, it should be noted that in cities such as Nairobi, neo-customary land delivery system can operate without using land that was once delivered by a customary system. The Kenya illustrates how, even without land reserves, neo-customary leaders can intervene, especially in land disputes resolution, in community organization, and in mediation between residents and public authorities (Onibokun, 1985). Although there is a general perception that public land is cheap, the number of failed bids when the public sector tenders its land at market value attests that public land is not cheap. Bryson & Lombardi (2009) point out that government's dispose of land for development, develop the sites for public and own use or enter into joint ventures on strategic or catalytic development projects.

Government intervention in the urban land market has an impact on urban land supply (Yan & Ge, 2014). There are two kinds of government intervention in the land market. The first involves development control, which shapes and imposes restrictions on the land use. The second involves direct control, where the government is involved as a market participant and supplier of land for commercial property development (Yan & Ge, 2014). Zimmermann (2007) says that "good governance in managing public land, first of all, means establishing a sound policy regarding how government should intervene in land matters".

Thus, there is a clear distinction between government intervention using its land ownership, which is the focus of this study, and the policy-related interventions. The price elasticity of supply and demand of land is a central concept in the land market. First, because land is a finite resource, its supply is relatively inelastic: no matter how high the price of land, one cannot increase its physical acreage. This has significant consequences for urban development. Increasing demand for urban land can rarely be met by increasing supply, as land is relatively inelastic. As a result, prices are bound to increase disproportionately to supply in ways that negatively affect poorer people in urban areas (Knight Frank, 2009).

4. Methods and Materials

This study paper is a qualitative data based study. It has used different literatures related to urban land and housing with deep review analysis done, different planning and report document of the selected countries were used for analysis purpose through the technique of a qualitative research method. In this case, the document analysis technique used and which is defined as a systematic procedure for reviewing or evaluating documents both hard copy, electronic computer-based and internet transmitted material (Bowen, 2009). This study used relevant literatures, theoretical justification, National and International reports to collect the facts and current information about urban land delivery systems and housing development policies, which in turn helped to generate the findings and the conclusion of the study.

Due to the fact that, the rationale for this comparative analysis on the practices of land delivery system and housing policies of countries, documents were comes first and it was used in combination with other qualitative research method as suggested by (Yin, 2003). Based on different planning and report documents of each countries and research works done by researchers related to urban land and housing policies, the author has fully engaged in analyzing the experiences of each country from three different continents. And then, implications were taken and conclusions as well as recommendations were given to overcome the problems accordingly.

5. Overview of Countries Experience on Urban Land Delivery System and Housing Policy

In spite of overall upgrading of housing conditions in most of the countries, lack of improvement in a number of critical areas remains a key concern of growing affordability problems, homelessness, inadequate social housing provision and land shortages in high growth zones. Drawing on the practice of different countries and towns in the region, it is clear that housing policy modifications are instantly required to confirm that access to adequate and affordable housing becomes a main concern. Despite the fact that inclusive and long-term changes in housing policies have been, and will continue to be, very problematic and debatable, crucial action is needed by countrywide, provincial and local governments. Be acquainted with the diversity of countries

in different continents and the particulars of their housing schemes, it is mainly puzzling to deliver comprehensive endorsements for change.

5.1 Urban land and Housing Practices in Selected African Countries

Urban centers across Africa are growing quickly, both demographically and spatially. Population estimates display that by 2030, about 50 percent of Africa's population will live in urban centers (UN-HABITAT, 2010). In the early 2040s, African cities will together be home to one billion, which is equal to the continent's entire population in 2009. Cities are becoming the future habitat of the majority of Africans. Furthermore, megacities, inhabited by more than ten million people, are evolving in different parts of the continent, such as Cairo, Lagos and Kinshasa (Obeng-Odoom, 2011; UN-HABITAT, 2010). The rapidly increasing urban areas are affecting land relations and employing pressure on peri-urban land located closely beyond urban boundaries (Cotula & Neve, 2007).

i. The Case in Uganda

Uganda is found in Eastern part of Africa and its population is growing much faster than the rate of housing supply in urban centers. According to the reports, (Government of Uganda, 2015a), the percentage of the population who are living in urban centers increased from 12.3% in 2002 to 18.6% in 2014 which is very high and it reflects an annual urban growth rate of about 5.2%; again, which is amongst the highest in the world. The rates of unplanned urbanization in Uganda are also high, ranging from 85.5% to 93% throughout the country. Accordingly, 85% of the low income population in the country's capital, Kampala, lives in illegal settlements and was taken as much higher level than other East African countries (World Bank, 2015a). The government by itself has estimates that nearly 60% of the urban population still lacks essential facilities such as sanitation and a safe water supply, which leads to a high disease and morbidity burden as well (GoU, 2015a).

As the government of Uganda has recognized that, the legal and policy framework governing housing is fragmented and inadequately regulates the private sector, whereas institutional harmonization among different ministries, departments and local governments is poor (MLHUD, 2016a). Local programs to build public housing or to offer subsidies or tax deductions for construction of inexpensive housing are exceedingly ad hoc (GHI, 2009). A National Housing Policy which was adopted in May 2016; this is a positive development, but only if it is correctly addressed in the country as a whole. As of the government of Uganda (GoU, 2015b, 2016), with lack of a considerable increase in government funding for housing constructions, strategy for making sufficient housing more available for all, reasonably priced and livable housing are improbable to succeed. The ministry of Lands, Housing and Urban Development was allocated 1.44% of the national budget in 2015/16 and only 0.6% in 2016/17. From the above amount of financial plans for housing development, a tiny proportion of it goes to housing (MLHUD, 2016b).

Four land tenure regimes are recognized by the 1995 Constitution and the 1998 Land Act: Customary, Freehold, and leasehold system. From these, customary tenure is the most common one and accounts for about 80% of total land holdings (GoU, 2015a). Customary land is largely untitled and is often not demarcated or surveyed by the concerned bodies (MoLHUD, 2013). This makes land and home ownership harder to prove, which exposes communities to land grabbing and forced evictions as well.

ii. Land and Housing Policy in Kenya

In Kenya land shall be apprehended, used and managed in a way of in an unbiased, efficient, productive and sustainable, as well as in accordance with the subsequent major philosophies these are: equitable access to land; security of land rights; sustainable and productive management of land resources. These principles are applied through the national land policy developed and reviewed regularly by the national government and using land related legislation. Based on the above philosophical assumptions and principles, both rural and urban land in Kenya belongs to the people of Kenya collectively as a nation, as communities and as individuals (Belachew, 2010).

Land management in Kenya is complex and requires bringing all elements to function in a coordinated manner. It requires physical information of vulnerable land and identifying available land; protecting watershed, vegetation, topography, drainage courses; guiding land development through mechanisms (land pooling, land banking, etc.) and incentives; and locating accessible lots in close proximity to socio-economic opportunities.

Urban sprawl in Kenya is real and is manifested in the growth of unplanned settlements in peri-urban areas resulting to the infringement of agricultural land. This has posed various challenges.

Appropriate land use and management process is fundamental in promoting sustainable and resilient cities. Urban sprawl is the classic example of mismanagement of land and is unsustainable. There was Vision 2030 envisages land reforms that are geared towards a holistic management of land.

Reforms in the land sector whereby there has been the establishment of: -National Land Commission that is a Constitutional Commission established to strengthen local level mechanisms for sustainable land rights administration and management, Establishment of a National Land Titling Centre which is a core land record management centre and has improved service delivery and Modernization of land registries across the country towards improvement of service delivery (GoK, 2016).

Therefore, In Kenya land is alienated as public, community or private ones. In this case, land which is classified as private consists of registered land held by any person under any freehold tenure system; land held by any person under leasehold tenure; and any other land declared private land under an 'Act of Parliament'. In Kenya, the State has full authority to regulate the use of any land, or any interest in or right over any land, in the interest of defense, public safety, public order, public morality, public health, or land use planning.

At present, in Kenya urban land is administered by city administration councils as trust land. While, since the existing land holding propensity has become more of free holdings, the reallocation of urban land to different users is prepared through state governments, city administration and private holders. Provisions of urban lands, which are transferred from city administrative and private holdings to different users are mostly determined by demand and supply signals of free market. In general, transfer of land use rights is made through freehold sale, leasehold sale and grant.

In Kenya, the minimum price of leasehold sales (when land use rights are transferred through auction) is determined by Ministry of land tenure and experts of city administration. Moreover, selling documents recorded by private businesses are considered to be a supportive reference for price rating of leasehold sales. Though, the final decision is made both by Ministry of land tenure and city councils. Price rating is revised within ten years' time interval. The upper limit of lease period is 99 years; but, the lessee has the right to decide upon the use period within the ceiling limit. Regarding lease payment, the lessee is mandatory to pay 25% in advance and the remaining 75% after receiving the required land. Furthermore, when the lessee wants to rent or transfer part of the leased land to the third party, he/ she have to get consent from Ministry of Land Administration. (Belachew Yirsaw, 2010).

As pointed out earlier, in Kenya, there are diverse rules and principles that enable and facilitate land market and related properties. According to, Belachew Yirsaw (2010) some of the laws enforced and used to manage land include: real-estate representative, surveying, rent, land utilization plan, land administration and land holding laws.

iii. Land and Housing Policy in South Africa

Although land is owned both by the government and the private sector in South Africa, the lion share goes to the private sector. Due to this fact, land is transferred to different users either by perpetual or lease sale. In general, as the country follows the market oriented economy, more of the land marketing is undertaken by the private sector (ULM, 2011).

In South Africa, about 76% of land is privately owned, which includes land owned by municipalities, and about 58% of households have secure tenure in the form of ownership, leasehold or formal rental contracts (ULM, 2011). However, unequal access to markets in land, housing, and development and use rights reinforce the historical inequality in spatial land use (Napier, 2007). This is driven by the property market, which is based on competitive bidding: when players compete freely over limited urban land, land goes to the bidders who can afford higher prices. Furthermore, players are willing to pay higher prices for land that is well-located in respect to economic opportunities and transport nodes (Ibid).

The average lease period in South Africa presently ranges between 20 to 30 years, leading to a curb in issuing title deed. For this reason, the title deed is given to those lease contracts serving a contract period of 10 years and above only. Besides, the lease can be renewed if the land is not needed by the lessor. If the city administration requires the land for the public use (for such as sport center or expansion of the town), it has the right to take the land via compensating for the land and its related developments. Payment of lease price is accomplished through upfront and on monthly basis and is completed in ten years period of time. The monthly payment is enacted by law to be renewed within five years of time interval.

Opposing to these experiences in the other countries cited before, South Africa has little experience in implementing the system and hence there are no specific laws on lease contracts and leasehold rights as well. However, lease contracts are legally accepted in the country and hence, the country has developed practical experiences in determining lease period and lease payment. In short, in South Africa, lease sales are governed by laws of contracts and standardized documents which have a legal basis.

iv. Urban Land Delivery System and Housing in Ethiopia

Until the advent of the military (Derg) regime in 1974, all land in Ethiopia was privately owned. The military regime transferred all ownership of land to government through Government Ownership of Urban Lands and Extra Urban Houses Proclamation no. 47 of 1975. In addition to enforcing the popular “land to the tiller” slogan the proclamation also nationalized extra urban houses. People who did not have a house and wished to construct one were allowed to get a plot of land up to 500m², free of charge. The government also launched construction of rental housing program to offer housing to the lower income group of the community at an affordable price.

The military government was removed from power by the Ethiopian People’s Revolutionary Democratic Front (EPRDF) in 1991. This led to an appraisal of the land tenure system with an emphasis on leasehold rights, while all land remained public/government property. The new government made known to an urban land tenure system completely based on leasehold, which was introduced by the urban land Lease Proclamation enacted in 1993. The Lease Proclamation was revised 2002 and once again in 2011.

As noted above, leasehold is the ultimate urban land-holding system in Ethiopia. The urban land Lease Proclamation No. 721/2011 stipulated that all land in urban areas was hereafter transferred in to a lease system. This included plots acquired previous to the implementation of the leasehold system in 1993 (which are commonly referred as “old possessions” or “freehold”).

Urban land for any type of development (especial cases are addressed through the will of the government) in Ethiopia can be reassigned through auction or allocation. In both cases the land to be transferred should be free from claim and should have access to basic infrastructure. The auction and allocation procedures are described in the Lease Proclamation. When land is put out for auction the bidders are required to provide a payment guarantee which shall not be less than 5% of the total benchmark price of the plot.

5.2 Urban land and Housing Practices in Selected Latin America Countries

a) Land and Housing Policy in Brazil

In Brazil until the 1930s low- and middle-income families acquired housing primarily through the rental markets, while for the upper classes housing was mostly privately supplied, because there was no formal housing finance system (Sampaio, 1994; Bonduki, 1998). Silveira and Malpezzi (1991, p. 88) argue that “the private rental sector was fundamental in the delivery of housing to the fast-growing urban populations of Rio de Janeiro and São Paulo (where rental accounted for about 70% of all housing in the 1920s).”

This situation started to change after the 1940s, when the principle of “self-owned housing” gained momentum with the declaration of the 1942 Tenants Law and with national housing policies that began to advocate homeownership under President Getulio Vargas’s government (1930–1954). The rent control system established under the 1942 Tenants Law generated incentives for the building of housing to sell for owner occupation, making formal housing less affordable and pushing the deprived people into informal housing markets. The development of self-owned housing is closely linked to the escalation in the construction of high-rise buildings in central areas and self-help construction on the margin of the cities. The shift in enticements against private rental housing, together with the huge demolition of low-income rental housing in central areas due to urban renewal projects all in an environment of rapid industrialization, rural exodus, and explosive rates of urbanization led to the appearance of slums and peripheral settlements in the country’s main metropolitan areas (Ribeiro, 1997; Silva e Silva, 1989).

b) Land and Housing Policy in Panama

Jacobs and Savedoff (1999) use data from two cities in Panama to assess the causes of tenure choice in two models. In the first model households choose between owning and renting; in the second model households are categorized as buyers (finished housing), renters, or builders (progressive housing). Their outcomes show that life-cycle variables impact the choice between owning and renting, while the choice between buying a completed housing unit and progressively building a house is governed by income and asset levels.

Koizumi and McCann (2006), also studying housing tenure in Panama, grasps similar conclusions. These authors develop a series of log-linear models in which the rent-buy models are prolonged to embrace purchasing a plot for upcoming building as a third tenure probability. They conclude that the lengthy models achieve better in pinpointing which household features are allied with a specific tenure choice. Their results recommend that the age of the household head and the number of economic dependents are the

key factors in the choice among renting and buying a home. Education and income levels explain the household's choice amongst buying a plot for future building and purchasing a finished dwelling unit.

c) Land and Housing Policy in Chile

Chile has made considerable progress in promoting access to affordable good-quality housing over the past two decades. The proportion of households that have no housing or that live in sub-standard housing has fallen from 23% in 1992 to 10% in 2011 (Ministerio Desarrollo Social 2013). Nevertheless, the incidence of poor quality housing and overcrowding is still high by international standards and residential segregation continues to be significant in Chile's urban areas. Compared to other OECD countries, Chile is also characterized by small rental housing sector, which accounts for 18% of the housing stock; on average this tenure comprises 32% of the housing stock across OECD countries (Salvi Del Pero et al., 2015). In addition about 12 300 individuals were homeless in 2011 – an estimate that corresponds to about 0.07% of the population and includes people living rough, in emergency accommodation and in accommodations for the homeless (Salvi Del Pero et al, 2016).

Housing policy has played an important role in making more housing available and improving the living conditions of the poor in Chile (OECD, 2012). In fact, reducing the housing deficit for vulnerable groups is the main reported objective of housing policy in Chile, along with supporting the middle class in achieving their housing aspiration (Salvi Del Pero et al, 2016). Practically, it needs some modification even if it was responding on the shortage of housing.

5.3 Urban land and Housing Policy in Selected Asian Countries

a. China's Experience on Land and Affordable Housing Policy

Since the market-oriented reform of its welfare housing scheme in 1998, China has made inspiring progress in improving the housing conditions for hundreds of millions of urban residents within a short period of time (Man, 2011). However, the affordability of housing still poses one of the biggest challenges in urban China (Yang & Chen, 2014). Land and housing policies are among the Chinese government's most important tools for fine-tuning the economy. A housing policy that addresses the needs of the majority is critical for any government during the transition period. Today the government is looking at a long-term land allocation plan oriented toward economic restructuring as a tool to control economic cycles (ADB, 2008).

Increasing housing price is the main issue in a numerous big cities in China. Municipal administrations have responded to the calling for upsurge housing supply to middle and low-income families by a number of policies and housing programs, amongst which are the Affordable Housing Program and the Housing Provident Fund Program. The Affordable Housing Program (commonly known as the "Economical and Comfortable Housing Program", is aimed to provide affordable housing to middle- to low-income households to encourage home ownership. In 1998 the Department of Construction and Ministry of Finance jointly promulgated "The Method of Urban Affordable Housing Construction Managing," marked the start of the program. Aimed at middle- to low-income households (annual income less than 30,000 to 70,000 RMB according to size of household and the specific area), this public housing program provides housing (usually 60–110 square meters) at affordable price usually 50–70% market price (Lou, Jianbo & Joyce Palomar, 2015). Within the policies and orders set by the central and local government controlled the profit for real estate developers to be less than 3%, so as to preserve the price of housing at the affordable level (Ibid).

China introduced the Housing Provident Fund (HPF) program countrywide in 1995. It is the same as to housing fund programs in other countries such as Thailand and Singapore. HPF delivers a mechanism permitting potential buyers who have an income to save for and ultimately purchase a unit private house (which may be a formerly public housing unit). The HPF comprises a subsidized savings program accompanying to a retirement account, subsidized mortgage rates and price discounts for housing purchase (Yohannes, 2016).

Here the researcher assessed official statistical reports and got that China is currently experiencing the largest scale of urbanization ever known in human history: the urbanization ratio in China will reach 69 percent in 2030, and the urban population will elevate by more than 300 million over the period of 2011 – 2030 (United Nations, 2012), which implies that there will be a strong and constant momentum for the increase of housing demand in urban China in the next few decades, However, the land availability for urban residential use in China is small compared to its fast- growing urban population. The 36 million social housing program is underpinned by the basic housing right (decent housing for all) policy launched since 2007, which marks a watershed in the Chinese housing regime and signals the resurgence of direct state intervention in housing provision (Wang & Shao, 2014).

Thus, housing policy in China is still an extension of economic policy. The Chinese experience regarding the interaction between the housing system and urbanization is highly unique, but it clearly indicates that an effective housing system that can responsively provide sufficient affordable housing is an essential component to the success of inclusive and equitable urbanization.

b. Experience on Land Lease and Affordable Housing Policy of Pakistan

The Land Lease Policy in Pakistan was formulated in 1985 under the provisions of Pakistan Civil Aviation Authority Ordinance of 1982, whereby approval of the Ministry of Defense was compulsory for all leases. This practice remained in force till the 6th of August, 1999. In this way the Civil Aviation Authority remained confined to the bare necessary operational requirements involving oil companies, airlines and handling agencies etc.

A comprehensive review of the Land Lease Policy has been carried out to remove the irritants and to soften the rigid components without compromising the Civil Aviation Authority's interest with a view to make the Policy more attractive/investor friendly. Efforts have been made to incorporate elements of negotiations, rational pricing, payments re-structuring, period/tenure flexibility and autonomy, both administrative and financial.

As per the Civil Aviation Authority Land Lease Policy approved by Civil Aviation Authority Board, the duration of lease shall be 30 years which is renewable on mutual consent. The market value of the land shall be assessed by a committee for which Collector/Revenue authority of the District, mentioned to be responsible. If the price of land being offered through auction is equal to or more than the assessed value, the Committee may take an independent decision.

The most distinguishing feature of the Pakistan urban land administration is the annual rent of the land shall be fixed at a sum which will be equal to 1/30th of the value of land for the first ten years. It shall be enhanced by 100% on expiry of each term of ten years. The method of leasing will be Auction based and through private accord.

c. Land and Housing Policy in Malaysia

According to the Malaysian National Plan 2020, the target of Malaysia is to be a high-income country and to achieve a GDP growth of 6 percent annually. All these figures and statistics show the real trend of development currently take place on the ground. As a result, the unplanned urbanization led to unsafe and inconvenience environment for living owing to its own problems that it created and added to the unpleasant urban environment. This issue has some negative impact on the city physical form which is discussing below and other problem regarding to the environment as; climate changes, freshwater scarcity, deforestation, fresh water pollution, flash flood, and population growth (Bhuvandas N, 2012).

In fact, an increase in the middle-income group in the urban area has resulted from urbanization which eventually leads to more demands for affordable housing (Lim X Y, Olanrewaju A L, Tan S Y and Lee J E, 2018). In Malaysia private sector or developers, is becoming the main housing provider in Malaysia, therefore the provision of affordable housing has becoming more critical and crucial (Masram H and Misnan S H, 2019).

The rapid increase in house prices, particularly in the major urban centers, has been attributable partly to a shortfall in supply. The shortage is particularly evident in the supply of affordable housing. However, this latest policy is one of the government's efforts to help low-income groups help reduce the initial payment burden of their home purchase. This has increasingly priced out more urban Malaysian households from the housing market. The Malaysia government is very serious in ensuring all its citizens towards owning their own homes. Perhaps the main issue related to affordable housing is the mismatch between the supply and demand (Star T, 2018).

According to (Barry and Roux, 2012), the fundamental theory of modernization and development, theoretical constructs in the land tenure domain also imitate an evolutionary approach to considerate the humankind-to-land relationship (Ting and Williamson, 1999) that has endured regardless of critique (Willie Tan, 1999). Evolutionism is known as (Le Roux and Graaff 2001, p46) "A theory which proposes that long-term social change happens in stages, that it is linear, gradual and irreversible, and that it is progressive".

6. Major Findings

The findings were presented based on the specific objectives of the study stated above. In this study, the specific objectives were to examine the experiences of countries on how they were delivering and managing urban land for housing development, to analyze

how the selected countries were addressing the land and housing shortages to the respective citizens and to suggest possible implications and address the problems of urban land and housing in Ethiopia.

There is an urgent need to prepare for urban growth and related land needs, which requires realistic projection of urban land needs based on current land information and population growth thus develop innovative responses. Failure to do so will only worsen slum development and poverty in cities. However, there are also immense opportunities for tapping the positive transformation of cities, including the potential of economies of scale, good governance, and land and property tax systems to self-finance cities.

Most of the problems of land delivery system for housing development have been aggravated by the rising of population in number (especially the low income groups), poor land supply and delivery system, and others create a high gap between the demand and supply of urban land for housing purpose. The magnitude of the gap can be reflected by overcrowded house unit, sub-standard houses, land speculation, squatter settlement and encroachment of urban land at the periphery.

The demand of urban land for housing purpose increases in the consecutive years and it was largely because of a rapid population growth in the city centers of the countries through immigration and high fertility rate. The number of applicants for housing land increase from year to year. Whereas, the supply of housing land by the municipality is very small and limited.

In the past and present time (few) countries were not supported their land development and management through applying technologies that support and give chances for identifying which land was delivered for some type of land use or not. There were some problems that make municipalities even to separate the land use type given for development purposes. A pro-poor housing policy is therefore a very important element of a national development strategy. When adequately developed, it can be a major source of local employment and can act as development multiplier, benefitting different related complementary industries.

Because of poor urban land management and delivery systems followed by some of the developing countries selected above, there was an implications of high rate of informal settlements in the peripheries of urban centers, high rate of corruption activities on urban land issues, increasing shortage of housing which was expected to be delivered to their citizens through housing construction done by governments of countries, by real estate developers, by the housing cooperatives and through self sponsored housing developments were very limited. These all schemes of housing constructions were negatively impacted by the ways of land delivery system that governments are using. In some cases, even if land belongs to the state or public a lot of parcels were taken informally by the citizens especially in the above selected countries urban centers of Africa.

7. Discussions on the Findings

According to the above detail presentations of each country experiences, most countries have nearly similar urban land and housing polices applied so far with few differences.

The housing shortage and very limited supply is majorly dependents on the supply of urban land and its delivery system for different housing schemes withier its by self sponsorship to construct a house or by the government public housing and or by private real estate developers.

In this case, land supply and its way of acquiring is taken as from the major problems and city administrations were facing very limited supply of urban land and it has its own impact on shortage of housing the citizens and making them to be a home owners.

Based on the experiences of countries discussed above, there were problems in legalizing the issues of urban land and housing development. Countries in Asia, are recently supported the housing issues with legal frameworks and land delivery system as the vital input to make their citizens a home owners. Countries have their own legal frameworks related to how this scarce, limited and fixed resource should be governed to achieve the interests of their citizens. Accordingly, countries were tried to check the legal issues related to land and natural resources and also amended it from time to time based on the situations in urban centers (where urban land is very limited and impacting negatively the housing demand of the citizens). Therefore, the case is clearly needs legal support especially for the middle and low income citizens of the countries taken as a sample experiences above.

Institutional capacity development problem is also taken as from the major challenges that these countries were faced. This was because, the urban land development and management practices should be supported with skilled man power, information technology and detailed authorized organizational structure and making an enabling environment to serve the respective citizens accordingly. Therefore, in developing countries there is skilled man power shortage, information communication technology and poor land administration strategies.

Financial sources are also taken as the major problem that developing countries are still facing. In countries where land is owned by the state, it may be a little bit good to acquire urban land for free or with less cost. Still, it was very difficult to those who are grouped as lower middle income groups and low income groups to afford the urban land lease and housing construction cost in aggregates. As discussed above, financial issue is also from the major challenges that these countries were facing. To address the shortage of housing in these countries, financial institutions are not well organized except very few countries and the subsidy ways should be seen.

There is a problem of informal settlement in most developing countries, which is taken as the major problem caused by poor urban land delivery system that countries are following. But, residents in these areas were still looking for legal acquiring of urban land to be delivered with low cost or for free. On the other hand, some of them are looking for the government to deliver them public housing after government sponsored construction done. In this case, almost all countries are unable to come across and solve the shortage of housing and even its becoming the major problems that countries are facing adding with their poor economic conditions.

8. Conclusion

Effective land management and administration initiatives are frequently hampered by complex and non-transparent legal and institutional frameworks, and inadequate capacity, including human and financial resources, thereby priorities focus only on immediate survival requirements. Improving land governance as a way of capacitating institutions in all round is an urgent issue because pressures on and competing interests for land is intensifying due to rapid urbanization, growing population, economic development, food insecurity, water and energy shortage, and the effects of conflicts and disasters. Some local governments do not take the opportunity to assess their functional needs from land and therefore are failing to adopt balanced and locally relevant approaches to land management.

Urban land management and administration institutions face the additional challenge of high number of people who live and work informally in urban and peri-urban areas. In most countries, there is a lack of reliable land information that negatively affects urban planning and design, infrastructure and socio-economic development. When properly functioning, fit-for-purpose land administration systems support tenure security improvement, urban planning, service delivery, agricultural development, environmental management, city management, land taxation and land management. Sustainable urban expansion is therefore an important process to mitigate urban sprawl, unsustainable land use and land tenure insecurity.

A variety of strategies have been implemented throughout the world in terms of pro-poor housing policies, some of which have involved significant cooperation with the private sector, focusing on financial support to tenants, while others have been based on direct construction in the public sector. Different strategies have been used in terms of allocating housing, including full tenure, leasing and renting in different countries, but still the land delivery system problems and housing shortage is the major problems that countries are facing.

9. Recommendations

Financial subsidy and land for free (less cost) for housing development: Affordability of housing remains the fastest-growing and most pervasive housing challenge in the selected countries according to this comparative analysis. Housing costs have increased with significant implications for access to adequate and affordable housing, particularly for vulnerable groups. Therefore, there should be serious understandings on financial support on land acquiring and housing response is a must to support the lower-middle income groups and low income groups of the citizens.

Provision of affordable rental housing: Legal and regulatory frameworks, appropriate to specific country conditions, that enable and encourage investment in housing at all levels, while contributing to local economic development and facilitating income-generating opportunities should be considered. Here, governments were the soul owners of land and it gives more chances to think on rental housing developments and then support citizens by delivering enough houses. So, housing should be constructed for renting purposes as well.

Go for Comprehensive policies on land delivery and housing shortage issues: Most developing states have seen unprecedented increase in homelessness in large urban areas as well as rising demand for overnight shelters. While preventative approaches are particularly important, policy action needs to focus on legislative and funding opportunities to build a continuum of housing for a variety of needs, from temporary shelters to permanent, non-profit housing co-operatives.

Mobilize inclusive efforts to address the housing crisis: Developing housing for extremely low-income households is difficult without multiple subsidies and complex financing packages, and in most cases is clearly beyond the capacity of national or local governments. While there are a lot of different small scale projects supported by the international community, without capital subsidies to fill the gap, the existing programs cannot adequately serve the poor refugees. Furthermore, other schemes, such as site and services options, might be more appropriate in some cases mobilizing self-help and incremental household investment.

Increase the provision of housing through urban renewal projects: In response to concentration of poverty in certain neighborhoods and patterns of social exclusion, a number of countries in these continents address the provision of affordable and adequate housing through area-based urban renewal and regeneration programs. Local governments, working in partnership with non-profit housing providers and community groups, have experimented with inner city regeneration, brown field and waterfront redevelopment schemes. The search for effective strategies for urban regeneration to create a social mix, increase the supply of urban land and affordable housing as well as responding to the problem of shortage of urban land supply has promoted new models and a new repertoire of planning instruments to deal with social inclusion. This approach to social inclusion through housing policies should be implemented to overcome the situation.

Address the management problems related to land and housing: The management of land and housing issues controlling system is to be very serious. Therefore, countries should think about their skilled man power on the management issues and support the land and housing services delivery with information technologies and arrange the organizational structures of the urban centers. Countries in transition need to introduce both legal and institutional policy changes to improve the management of land and housing sectors.

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