

## Understanding the Privatization in Housing in the Global Context

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**Abstract.** The world is urbanizing at a fast pace, and housing is one of the basic requirements of mankind. The continuous increase in population keeps generating demand for additional housing, particularly in urban areas. The natural growth of population and migration act as the main drivers behind the increased population pressure in urban areas. In the early twentieth century, the public sector assumed sole responsibility for providing housing to all sections of society. However, this led to an increased burden on public resources. Privatization in housing was therefore considered an alternative to accelerate housing delivery as well as to reduce the burden on the public sector. The present paper discusses urbanization and housing status in a global context and the emergence of privatization in housing. It also examines the efforts made by different countries, including the case of the U.K., the U.S.A., Germany, Chile, Canada, China, Bangladesh, Malaysia, and Russia, to introduce privatization in the housing sector.

**Keywords:** Urbanization, Privatization, Vouchers, Grants, Concessions

### 1. INTRODUCTION

The continuous increase in urban population and the limited resources of the public sector to fulfill the ever increasing requirements lead to the emergence of the private sector. It was realized that the government could not maintain the role of direct producer of housing, and the need for the private formal or informal sector was identified. The role of government started shifting as enabler, facilitating, and encouraging private sector participation in housing. The primary objectives behind an enabling strategy were to improve the performance of the housing sector as a whole and to leverage limited public resources to the greatest extent possible (Mayo and Angel, 1993).

The efforts towards participation of the private sector in housing first emerged in the UK under the provisions of the Housing and Planning Act, 1986, and the Housing Act, 1988, wherein the local authority can have a business plan and contract with tenants, and a 100 percent private finance package was given by the local authority, as well as tenants had the liberty to find suitable landlords. The Act also covers provision of private financing for social housing, private management for social housing, as well as the enabling role of local authorities (Whitehead, 1993; Linneman and Megbolugbe, 1994). Thus, there was a transfer of ownership from the public sector to private hands in the UK housing delivery system.

The US government, through the National Housing Act of 1960 and 1968 rely on private management skills and provides financial assistance to low and middle-income households. In Section 8 Programme of the Housing and Community Development Act of 1974, the government permitted low-income households to rent existing housing stock in private rental housing. Housing vouchers were issued, wherein the voucher recipients can spend as much as they want for housing by supplementing the voucher payment. This policy marked a success in housing supply (Linneman and Megbolugbe, 1994).

In India, till 1990, the government sector was acting as a provider to fulfill the housing needs (Pugh 1990). Public sector housing supply was generally delivered by the respective State Housing Boards, which were extended to Housing Boards of the cities. Several central and state governments had the policy of housing provision to their employees from their own outlay, such as income tax colonies, railway colonies, etc., which also contributed towards public sector housing (Nallathiga, 2007). The formal private sector needs to get registered under the Companies Act of 1956 for participation in the housing development process. In 1991, India pursued economic reforms and liberalised various economic sectors. Housing was also one such sector (Mahadeva, M., 2006). The National Housing Policy, 1992, emphasized the creation of an environment facilitated by the government in order to increase the growth of housing rather than building itself. Now the role of the public sector is related to direct provisioning of housing to add to the overall housing stock, and creating an enabling environment for the private sector to add to the housing supply (Tiwari, P., and J. Rao, 2016).

According to the UN World Urbanisation Prospects Report (2018), "Presently, more than half of the world's population, i.e., around 55 percent (4.2 billion), lives in urban areas". It is projected to reach 68 percent by 2050. The level of urbanisation in Asia is around 50 percent, which is less when compared to other regions, but it accommodates around 54 percent of the world's population, followed by Europe and Africa, 13 percent each. The increasing population in urban areas due to migration from villages and natural growth has and will create pressure on urban land through increasing demand for housing. The present paper focuses on studying the model of privatisation in housing adopted by different countries to resolve the issue of housing provision. The paper discusses the case of the U.K., the U.S.A., Germany, Chile, Canada, China, Bangladesh, Malaysia, and Russia to cover different continents of the world.

### 2.2. URBANIZATION AND HOUSING IN A GLOBAL CONTEXT

Urbanisation has been a global phenomenon due to the migration of rural populations to urban areas in the wake of employment opportunities and improved infrastructure. Resultantly, urban areas have grown in leaps and bounds (Tacoli, C., et al., 2016). Also, it is interesting to note that urbanisation trends have polarised in specific regions and larger cities due to their physical, socio-economic, accessibility, and political potential. Resultantly, demand for housing has also polarized in bigger urban settlements. Examination of global trends of urbanisation would reveal the nature and magnitude of relationships between increased urban population and housing demand.

Global urbanisation trends are alarming, and Asian countries are experiencing high strides in their urban population growth. The trends of urbanisation reveal that it has a history of about 200 years, when the congregation of population was witnessed in a few settlements. Till the 1950s, urbanisation was largely occurring in high-income countries, including Europe, America, Australia, and Japan (Ritchie and Roser, 2018). But it is being projected that in 2050, all the countries will have a more urban population, especially the developing ones. According to the UN World Urbanisation Prospects Report (2018), "Presently, more than half of the world's population, i.e., around 55 percent (4.2 billion), lives in urban areas". It is projected to reach 68 percent by 2050. The level of urbanisation in Asia is around 50 percent, which is less when compared to other regions, but it accommodates around 54 percent of the world's population, followed by Europe and Africa, 13

percent each. The reasons for growth in the urban population are the overall population increase and the upward shift in the percentage of the population living in urban areas. These two factors are projected to add 2.5 billion souls to the world's urban population by 2050, with almost 90 percent of this growth happening in Asia and Africa.

The increasing population in urban areas due to migration from villages and natural growth has and will create pressure on urban land through increasing demand for housing (Kuddus et al. 2020). The increased affordability of the urban population also leads to increased housing demand. But despite the increasing demand for housing, there has been a shortfall of housing supply, as it is not a political priority (Azmi, Najihah & Ariffian, Bujang., 2021). The World Bank Policy Paper (1993) was the first to identify housing as an economic sector rather than solely a welfare issue. It was concluded that the housing sector is connected to the broader economy through a number of different perspectives, such as the real, fiscal, and financial. The Sustainable Development Goals (SDG) 11 focus on making cities inclusive, safe, resilient, and sustainable. Housing is considered as one of the major aspect that needs to be addressed as about 3 billion people worldwide are struggling for an affordable housing, with about 1.12 billion living in slums or informal settlements without basic services. The public sector alone would not be able to fulfill the increasing housing demand, so the role of the private sector has already been recognised in almost all countries of the world.

### 2.3. PRIVATIZATION IN A GLOBAL CONTEXT

In the 1970s and 1980s, it was realized that the government could not maintain the role of direct producer of housing and the need for the private formal or informal sector was identified. The role of government started shifting as enabler, facilitating and encouraging private sector participation in housing (Mayo and Angel, 1993). The Global Shelter Strategy for the Year 2000 (UNCHS (Habitat), 1990), adopted by the United Nations General Assembly in 1988, provided an official mandate to focus on the role of the private sector in meeting housing needs. The primary objective behind this enabling strategy was to improve the performance of the housing sector as a whole and to leverage limited public resources to the greatest extent possible (Mayo and Angel, 1993).

#### 2.3.1. The U.K.

In 1979, the Margaret Thatcher government initiated a fundamental reform in the role of the state in the housing sector. During the 1980s, under the Housing Act 1980, the right to buy was given by the UK government, which allowed tenants to purchase their property at a maximum discount of 70 percent, depending on the length of residence. The Housing and Planning Act, 1986, and Housing Act, 1988, provided initiatives to the local authority as well as to the tenants. The local authority can have a business plan, and 100 percent contracts with tenants, and private finance packages were given by the local authority, and tenants may find suitable landlords as well. The Act also covered provisions for private financing for social housing, private management for social housing, as well as enabling the role of local authorities (Whitehead, 1993; Linneman and Megbolugbe, 1994). UK housing privatisation, however, initially showed that transfer of ownership from the public sector to the private sector hadn't had effective participation of the private sector in the housing delivery system. The housing reform should consist of a wide range of policies aimed at improving efficiency by focusing on all the players (owners, managers, or financiers) of the process.

#### 2.3.2. The U.S.A.

In the case of the United States, privatization was brought through deregulation and liberalization, due to a smaller number of government-owned assets and enterprises. The US government tried to provide public housing through a wide range of policies and Acts like the Housing Act of 1937, under which the government paid the capital costs of the public housing while the operational cost was recovered through residents' rent. The National Housing Act of 1960 and 1968 relied on private management skills and provided financial assistance to low and middle-income households. Under Section 8 of the Programme of the Housing and Community Development Act of 1974, the government permitted the low income households to rent existing housing in private rental housing. Housing vouchers were issued, wherein the voucher recipients can spend as much as they want for housing by supplementing the voucher payment. This policy marked a success in housing supply. To resolve the problems in low-income housing programme, the President Commission on Privatisation gave recommendations such as government assistance to low income households through subsidies (vouchers); sale of small scale units to residents (management of existing units); sale of larger projects to tenant management organisations; contracting out of public housing management; closing of public housing projects and Government sub-subsidised private housing (Linneman, and Megbolugbe, 1994).

#### 2.3.3. Germany

Germany, another country in Europe, was able to achieve higher rates of house building. There were about 30 million new homes built in Germany between 1951 and 2014. In the early 1990s, different financing models were employed in Germany that included a combination of direct subsidies to private landlords and non-profit housing associations, through low-interest loans and tax reliefs on the condition that the homes built would provide submarket rents for up to 60 years (later revised to 30 years) (Davis, B. et al. 2016). Also, the strengths of Germany's rental market are widely known since they house around 40 per cent of the population. The reason behind Germany's more responsive housing supply is the capacity of its house-building sector, in terms of both the number of developers and the types of developers. It included the owner-occupiers and the individual landlords. At the same time, the German market included a different scale of professional sector comprising housing cooperatives, municipal housing companies, public housing companies, and private housing companies that collectively contributed to around 37 percent of the housing stock (ibid).

Also, the large private housing companies contributed around 6 percent of the housing stock in Germany (Savills, 2016). Both the UK and Germany employed plan-led housing planning systems wherein local governments had identified land for building houses in their local plan. The German system gave greater certainty to developers. An enabling approach to support faster brownfield development that included providing simplified planning processes and was meant to be more economically viable for investors and played a proactive role for local authorities in land assembly. The German local authorities enjoyed a higher degree of local autonomy in decisions about land allocation and were more proactive around land supply. There were significant financial incentives to bring forward new sites. Local authorities also got involved in "land adjustment", resolving issues of complex land ownership as part of the planning process. Also, the provision of local infrastructure was the responsibility of the local authority, which can charge landowners to recover parts of the cost. Capital gains tax was also levied on sales with exemptions for residences owned for at least 10 years.

Germany, in the private housing scenario, is in a stronger position as its mortgage market has been regulated and its market is less vulnerable to economic downturns. The housing construction is undertaken not only by a large number of actors, including large house builders, but also by many smaller, regionally based actors and a significant not-for-profit sector (both within and outside public ownership). In Germany, the housing demand and supply are well catered to through the joint efforts of public as well as private institutions.

#### 2.3.4. Chile

A long history of government intervention in the housing sector is observed in Chile. During the Pinochet's military regime from 1973-1989, the movement towards privatisation had begun by carrying out economic restructuring. The changes that emerged were that there would be no direct state intervention in housing, subsidies would be simple and awarded directly to the consumer, housing construction would also be governed by strict cost guidelines, and privatisation would take place in the production of housing while consumption was still closely supervised by the state (Sandhu, 2005). The reforms were primarily aimed at deregulation of land development, lowering or abolition of taxes related to land transactions, liquidation of the state's reserves of land, and also removal of illegal encroachments from lands. The reforms also included the development of mortgage financing and the rationalization of subsidies. These reforms were to enable private developers to acquire land easily for housing development. Municipal reforms were also undertaken in 1981, the number of municipalities was increased, wherein the objective was to ensure that the poor neighbourhoods could be targeted for assistance (Sandhu, 2005). In the mid-1980s, the Pinochet regime was forced to recognize that the housing needs of low-income groups would not be fulfilled without state intervention. Moreover, it was also noticed that private developers and banks did not have interest in household's earnings less than US\$200 per month. For which the government had to intervene by acquiring land and then contracting private builders for the construction of basic or progressive houses. In the basic house programme, a small unit was financed through the beneficiaries savings as well as government subsidies and loan and in the progressive housing programme, a core house is completed by self-help of the household. The government also issued cash vouchers under the USP, which helped households to buy the dwelling units that were built by private firms. Consequently, the total housing stock production increased from 19,160 in 1979 to 79,000 in 1990 and subsequently to 138,000 in 1997, thus marking a 75 percent increase. In Chile, the private sector was allowed to grow and expand; the state had to intervene to provide access to the lower-income groups to shelter.

#### 2.3.5. Canada

In the case of Canada, housing has been identified as a tool for economic development in its housing policy, since housing has an effect on employment and other features in the economy. The National Housing Act of 1944 stated the expansion of employment and encouragement of home ownership through the private market as major goals to stimulate economic development. In the 1950s and 1960s, the federal housing programs were initiated to stabilize the construction industry and to check the economic fluctuations by generating employment. Later in the 1970s, new social housing programs were introduced. In the 1980s, the federal government reduced its direct housing expenditures (Prince, 1995). In 1985, the Canada Mortgage and Housing Corporation provided major housing assistance for the effective functioning of the private market and agreed to avoid direct stimulation. In the 1990s, the general policy approach stressed the market rather than increasing the overall supply of areas and percentage of different-sized plots. The policy had implications that welfare arrangements are important in enabling the poor to gain access to housing that also includes rented housing. And the poor are more dependent on the market, especially the older housing stock than the new ones (Crook, R. C., & Manor, J., 1998).

Coming to Asia, China experienced the housing reforms in the late 1970s when the market-oriented reforms were introduced, with the gradual change in the main supplier of housing from the state to the market. These reforms included the housing transaction wherein there was a transfer of property rights of welfare houses from work units to worker families. Also, privatization was introduced in the housing sector by allowing both private housing and government-subsidized private housing constructions, and encouraging foreign businesses and real estate enterprises to develop commercial housing (Zhang, H.M., 1998).

From 1980 to 1994, it was considered the Pilot Reform Period, which included the subsidized Housing Sales phase. Under this, cost sharing was promoted, and purchases were done through subsidization. It helped reduce the housing problem and also created a new relationship between the state, work units, and residents. From 1986 to 1988, the approach of incorporating raising of rent, increase in wages, and facilitating housing sales was put forth as the guideline by the Leading Group for Housing Reform established in the State Council. In this phase, both newly-built and existing housing were open to reforms. With increased rent and subsidy delivery, housing sales were facilitated. The 1988 reforms fostered the privatization of housing, and much of the stock of rental housing was sold to employees of public enterprises at low prices. Through this reform, the state got relieved of maintenance, rent collection, and subsidy delivery. Housing investment was retrieved for construction and maintenance, and private ownership of self-occupancy housing was increased (Shaw, Victor N, 1997).

The 1995-2000 period is considered a Housing reform sales period wherein the housing division was made between institutional and non-institutional units. The work unit system, wherein housing serves as a reward for loyalty, as compensation for low wages, and the power to redistribute, became important mechanisms for housing inequality in the housing reform period. The welfare housing distribution system, in which the professional elite within the system received newer and higher quality housing, led to the accumulation of social privilege (Wu Kaize, 2019). These reforms further led to inequality as housing property rights were more readily accessible to families with higher occupational status inside and outside the system.

#### 2.3.6. China

Housing marketization period in China (2001–2010), gradual establishment of the real estate market consisted of a highly monopolistic land transfer market and a highly commercialized housing market. The real estate industry became a pillar industry of the national economy; thus, housing became an important commodity and investment. The local governments monopolized the land supply through land reserve and the bidding system, making profound intervention into the real estate market. In "Measures for the management of economically affordable housing" issued by the Ministry of Construction in 2007, housing constructed with work units' collective funds was still defined as economically affordable housing. During the process of real estate development, multiple administrative approvals are required. As a result, work units inside the system have more bargaining power in the market. Families having political resources and power can obtain price discounts, preferential loans, insider information, and so on (ibid). But on the whole, the majority of unit workers bought houses at market prices, resulting in the disappearance of system differences. Thus, the housing reforms in China also stressed changing the role of the state

from provider to enabler. Different reforms were introduced at different time periods, but the elite class always got favored under all the reforms.

### 2.3.7. The People's Republic of Bangladesh

In the People's Republic of Bangladesh, housing has been recognised as a fundamental human right, and housing provision is considered a fundamental responsibility of the state (CPD, 2003). The Bangladesh government took its first initiative to formulate a National Housing Policy in 1993 that was updated in 1999 and again in 2004. This identifies housing as a basic necessity of mankind as it provides shelter, safety, and a sense of belonging to the owner. The policy also described the role of government as a facilitator or enabler rather than a direct provider, and the construction of housing is to be left to private sector developers, private individuals, and NGOs (Akter and Akram, 2020). In the year 1993, the total shortage of housing in Bangladesh was about 3.10 million units, which increased to 5.10 million units in 2000 and further increased to 6.20 million units in 2010. With a housing shortage of 6 million, the overall housing situation of the country is poor compared to the pace of development. Bangladesh Bureau of Statistics projected the housing shortfall to reach 8.5 million units for 60 million urban people by 2021 (ibid). Thus, a little has been achieved in terms of the implementation of the National Housing Policy. Property rights have not been assured (The World Bank, 2007).

The endorsed housing policy 2016 incorporates political, economic, environmental, and religious values and rituals for making housing provisions and developing sustainable human habitation, and also emphasizes protecting the environment and natural resources. At the same time policy suggests the creation of a 'Land Bank' with the khas and unused land of the urban and rural areas so as to form housing credit funds for the middle and lower income groups. Thus, it is evident that policy reforms of the Bangladesh government have not been able to fulfill all the requirements of sustainable housing for all. As the demand for housing is more than its supply and the private sector is concentrating only on high and middle-income groups.

### 2.3.8. Malaysia

In Malaysia, the housing development is guided by the national housing policy that was first introduced in 1971. The housing provision system in Malaysia can be broadly divided into four phases, namely Housing the Poor (1971-1985), Market reform (1986-1997), Slum Clearance (1998-2011), and State Affordable Housing (2012 onwards). In the housing the poor phase, the New Economic Policy was there from 1971 to 1990. This policy focused on the eradication of poverty irrespective of race and the restructuring of Malaysian society to eliminate the identification of race with economic functions. For achieving the objectives of the policy, the government started the reservation of 30 percent of housing for LIG with a controlled selling price of RM 25,000 per unit; opening up of new land and settlement schemes by the Federal Land Development Authority; and provision of housing finance by Bank Bumiputera (Masram and Misnan, 2019). The major achievements of this phase were that the LIG housing needs were given more attention by the government, and the role of the housing industry was identified in stimulating economic growth. The policy helps to add new housing estates, and the private companies were involved in providing housing to high and middle-income groups, whereas state governments were held with the responsibility of housing the LIG population.

In the market reforms phase, the new dimension of the National Development Plan was included, which focuses on the importance of human development, science and technology as the basis of development, and protection of the environment and ecology. In this phase Privatisation policy was introduced to reduce government spending, including housing for LIG. The private companies played a key role in housing provision of low-cost construction through the cross-subsidy system, which uses revenues collected by the sale of high-cost houses to reduce the cost of low-cost houses. The federal and state governments started to retreat from direct housing provision (ibid).

The slum clearance phase was marked with the development of Malaysia as an industrialized country with social and economic justice for all. But there were unresolved problems related to squatters, oversupply of low-cost houses, and an inefficient housing allocation system. In this phase new ceiling price for low-cost housing was introduced between RM 30, 000 and RM 42, 000 per unit according to location, and the privatization policy was continued (ibid).

In the state affordable housing phase, a new economic model was introduced with its policies to be implemented through the newly created Government Transformation Programme and the Economic Transformation Programme. This phase created too many houses through different federal and state government programmes in low-cost and high cost category, with a lack of affordable housing for the MIG population. There was a change in the target group from LIG to MIG for housing provision (ibid). The participation of private developers was encouraged in housing development. At the same time, joint ventures between the public and private sectors were also initiated to resolve the housing issues. So, housing policies in Malaysia were helpful in catering to the housing needs of the society.

### 2.3.9. Russia

In the Russian Federation housing sector has changed, the biggest among these was the privatization policy that led to a change in ownership structure by transferring the State housing stock to individuals. The first step towards privatisation was initiated in 1988 when fully paid-off apartments in housing cooperatives were turned over to the ownership of citizens. Over a period of one year, the process was expanded, which included the sale of units to tenants of state and public housing. Till 1991, the success of privatisation was limited. In June 1991, the Supreme Soviet of Russia passed the law 'On Privatization of the Russian Soviet Federation of Socialist Republics Housing Stock'. This law provided a new procedure for transferring the state and municipal housing stock into the private possession of tenants. The set of conditions laid under this law included, apartments to be turned over to the private ownership of their properly registered occupant, right to privatization under privileged conditions can be used only once, tenants can be issued with a 'voucher' without fee, the value of which can be calculated from the value of a single sq. m. of the 'average apartment' in their city and tenants shall pay the difference between the estimated value of their entire apartments and the value of the voucher. The occupants of cooperative projects and individual houses, however, were not eligible for vouchers (Kosareva, 1993; Kosareva and Struyk, 1993).

By October 1992, about 5.6 per cent of the apartments were transferred to private ownership. In December 1992, the Supreme Soviet passed a law that mandates free-of-charge transfer of apartments throughout the territory of Russia to accelerate the process of housing privatization. Privatization is to be encouraged by the provision of the 'Law on Fundamentals of Federal Housing Policy' that permits the creation of true condominium associations. The policy reforms complementing housing privatization were marked with an increase in rent by the local governments, the owner's property rights were made clearer and implicit, the privatization law permitted the long term and subsidized credits,

and a method was evolved to determine the price of the unit to be sold. The maintenance of housing stock also gets shifted to the private sector.

The downsides of privatization included that owners are required to pay the cost of maintaining the apartments, along with a property tax and a land tax, and the cost of utilities was also increasing. The methods for determining whether a person is qualified for social housing were also criticised. The governments were encouraging people to take out mortgages, but there was a marked reluctance to do so due to huge interest rates charged by banks (Attwood, L., 2012). Thus, in Russia, people without apartments have the option to privatize, and those not qualifying for social housing have to buy or rent on the private housing market

#### 2.4. CONCLUSION

The findings of this study show that the idea to bring privatisation in housing had originally emerged from European nations and was later adopted by other parts of the world in order to manage the increasing housing demands of the population. Germany allowed large and small developers to participate in housing development in order to meet the ever increasing housing demand. In the case of Chile, the lower income groups were ignored by the private sector, for which the government sector intervened through different programmes that resulted in increased supply of housing. Canada followed a private market approach while looking at housing as a tool to take care of the economic condition of the country. In China Privatization in housing has been incorporated since the 1970s, but their policy reforms are more inclined towards a population with strong political or administrative positions. In Bangladesh, policy reforms were made to make housing available to all, but the actual impact is not visible on the ground. However, the Malaysian housing policy efforts are successful in meeting the housing requirements. In Russia privatisation in housing brought an increase in homeownership.

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