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Comparative Analysis of Low-Cost Housing Policies in Malaysia and Nigeria

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ABSTRACT

The dearth of low-cost housing (LCH) provision in Nigeria calls for urgent attention and Malaysia as a fast-growing developing country mitigated a similar encumbrance, hence the need to review the LCH policies of the two countries. This will provide a better understanding of the mechanisms that were adopted by the Malaysian Government and suggest same to Nigerian Government with a view to mitigating homelessness in Nigerian cities. Drawing a systematic review of published literature, this paper reveals that Malaysian Government role in LCH provision is encouraging, although there are still some lacunas; already receiving the necessary attention by the stakeholders concerned. This paper reveals that the Malaysian LCH policies created opportunities for the poor, and therefore promote pro-poor growth to have a home while the Nigerian government policies encouraged inequality and enhance high disparities in access to financial credit for housing purpose by the low-income earners (LIEs) due to lack of framework and institutional failure. The paper conclude that LCH policies and programmes should be sustainable economically; socially acceptable, and technically feasible. In addition, the policies and programmes should enhance cooperation; consultation, sharing knowledge within the stakeholders and ensure that the LIEs can gain access to homes.

1. Introduction

Low-cost housing (LCH) provision is one of the significant difficulties confronting developing nations, for example, Nigeria. The issue is more intense in the urban metropolis as there is a high rate of urbanisation happening in most of the developing countries. The high rate of populace blast, a consistent flood of individuals from these countries to the urban focuses combined with the absence of essential shelters required for a good way of life has issues throughout the years. The

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urban focuses in developing countries, Malaysia not exempted, are confronting the issue of intense deficiency of reasonable convenience, and fast weakening of existing housing stock and living conditions. The provision of housing does not by any stretch of the imagination coordinate the development of the populace in most urban focuses; which represents the momentous inadequacy in urban housing, quantitatively and subjectively (Olotuah, 2002; Bakhtyar, Zaharim, Sopian, & Moghimi, 2013). LCH needs are not coordinated by viable request since the huge greater part of the masses does not have the finance for sufficient housing. This portion of the urban populace is without a doubt are low-income earners (LIEs), poor, and is obliged to restricted, inadequate, swarmed, filthy and dirty houses (Galbraith, 1969). Access and affordability to the housing by the poor who constitute the biggest level of the populace in the developing countries have perhaps lingered persistently.

In Malaysia, LCH provision is provided by both the public and private developers. Three parameters are considered when defining LCH, they are household income, selling price, and building size. Ministry of Housing and Local Government (MHLG) (1998) defined LCH as a housing unit of selling price not exceeding RM42,000 (1 US Dollar = RM4.24 as at 21st August 2017) per unit, aimed at the targeted group of household income not more than RM2,500 per month, and size of the building not more than 55.4 square meters. This comprises of one living room, two bedrooms, kitchen, toilet, and bathroom. In Malaysia, the minimum wage is RM1000 per month (Ebekozien, Abdul-Aziz, & Jaafar, 2017A). While in Nigeria, LCH provision is provided by the private developers, self-help, and public developers. The government role as provider and facilitator of LCH provision in Nigeria is weak, swallow and deplorable. Wahab (2006) defines the LIEs as all employees and self-employed persons whose monthly income is within N8,000 to N40,000 (1US Dollar = N365 as at 21st August 2017). While the minimum pay by law is N18,000/month, although most employers of labour including some state governments do default in this regards, most pathetic is that control and penalty for defaulters are weak. This should be expected because those to implement the sanction are defaulters too. Abdullahi (2013) opines that about fifty-seven percent (57%) of the Nigerian population falls below the poverty line, which is on the average of US$1 per day. World Bank (2017) reports that poverty headcount ratio at national poverty lines in Nigeria as at 2009 was 46. This is very high, as against 3.8 in the same year (2009) for Malaysia. In the year 2014, it became 0.6 in Malaysia, an indication of fast growing economy that promotes pro poor growth.

Ibimilua and Ibitoye (2015) assert that the LCH policy requires a technique for the authorisation of the motivation behind the proposed projects of activity. The housing policy is gotten from laws, controls and regulatory practices that can help the creation and conveyance of housing (UN-HABITAT, 2006). A most thorough LCH policy should address the part of the government and other stakeholders, while the government may shift from the arranging and control of all parts of housing planning creation - arrive, venture, development, and inhabitancy - to mediation just at specific levels. This is an indication that the LCH policy of a nation gives the direction of the LCH stock; perhaps, a faulty LCH policy or weak implementation is likely going to

lead to LCH shortage. Aigbokhan (2008) asserts that in Nigeria, the government policies (housing inclusive) have been encouraging high inequality, hence, inequality seems to rise with growth. Some of these policies are disparities in access to human and physical capital, disparities in access to financial credit and wide differences in returns to assets. Thus, the need to review and compare the LCH policies of Malaysia and Nigeria to identify Malaysian LCH policies that promoted pro-poor growth that was used to address the housing encumbrances faced by Malaysian and suggests same to Nigerian Government cannot be overemphasised.

2. Malaysian Low-Cost Housing Policy

This section categorises the Malaysian LCH policy historical development under the two distinct phases of the pre-independence (before 1957), and post-independence period (1957 to date). Stone (2006), Bahare (2017) asserts that during the colonial period before 1957, the government was the key players in housing provision. The author reviewed the Malaysian LCH but failed to identify the lacunas such as leakages in 30% housing provision. More worried is the obsolete price (RM25,000:00) stated by the author as the current price for unit of LCH. Table 1 gives the summarised details of the various policies from the pre-colonial era of the government to date. Between 1956–1964, the first 1st and 2nd Malaya Plan was rolled out. This period saw more LCH from the public sector but the private sector was not left out. The 1st Malaysia Plan (MP) (1965-1970) had the explicit recognition of the government's responsibility of housing the low-income groups. The 2nd Malaysia Plan (1971-1975) saw the launching of a public housing scheme for LIEs from the public sector and corporate societies encouraged to develop LCH from the private sector. This was enhanced more in the 3rd Malaysia Plan (1976-1980) from both sectors. This period saw the participation of many public agencies: Public Housing Schemes, Federal Agencies and Regional Development, Public Housing Programs, Institutional and Staff Quarters Schemes, and State Economic Development Corporation (SEDCs).

The 4th Malaysia Plan (1981-1985) saw the introduction of the LCH by both sectors, and both sectors were inter-linked. Shuid (2013) asserts that the year 1982 marked a watershed in Malaysian Government imposed a 30% LCH construction on private developers to ensure the private sector, construct LCH in every residential development since 1982 during the 4th Malaysia Plan. The 5th MP (1986-1990) linked the concept of housing with social amenities to the quality of living and well-being. During this period, private developer's contribution to LCH increased. Mohammed, David and Seow (2012) report that during the 6th MP (1991-1995), the National Development Plan came out, although private sector still played as a key player, the government created many new laws and guidelines to ensure quality housing, for example, National Housing Policy-1991 (NHP). During this period, more private developers were licensed to develop LCH program.

The 7th MP (1996-2000) came up with a new housing category, known as the low-medium-cost housing to address another segment of the population struggling to get on the housing ladder. In line with this, the 8th MP targeted the eradication of squatters in Kuala Lumpur and other major urban

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centres. Shuid (2013) and The Sun Malaysia (2016) assert that more LCH came in during the 9th MP (2006-2010), it was encouraging, including States Economic Development Corporations (SEDCs). These projects were implemented by state governments through grants and loans provided by the federal government, although not sufficient and mainly concentrated in small towns and sub-urban areas. During this period, Program Perumahan Rakyat Bersepadu (PPRB) was implemented for the resettlement of squatters. In the 10th MP (2011-2015) period, to address the issue of poor housing maintenance, the government established Housing Maintenance Fund (HMF). The Malaysian National Housing Policy (NHP) was launched on 10th February 2011, during the 10th MP (10th Malaysia Plan, 2010). The uniqueness of the Malaysia Plan is that at each MP, one can see the leading role of the government. This is an indication that the government is actually for the people.

Table 1: Summary of Malaysia housing policy with emphasis on the role of public and private sectors respectively compilation from various LCH Malaya Plans (1st and 2nd 1956-1964) and Malaysia Plans (1st – 11th 1965-1970 to 2016-2020) as modified.

Plan Period	Public Sector	Private Sector
Pre-Independence & Colonial Administration	Formal housing mode by British Govt., under divide and rule. Provided houses for govt staff, provided rural public low cost Program and resettlement.	No precise information regarding formal housing provision from this sector.
1st& 2nd Malaya Plan (1956-1964)	More low-cost housing units produced through Housing Trust Government built houses for rent and sales.	Government started giving loans for private sector developer. 90% houses built for the private sector.
1st Malaysia Plan (1965-1970)	Formal & structured housing programs commenced. 5 years Plans introduced. LCH was the major area of concern.	Private sector developers begun to develop properties in cooperation with the state. They compliment public sec. to provide LCH
2nd Malaysia Plan (1971-1975)	Housing Trust was dissolved; states took over. Public housing scheme was launched.	Corporate societies started to deliver housing units. Private Sector concentrates on middle and higher income housing.
3rd Malaysia Plan (1976-1980)	Public Housing Schemes, Federal Agencies & Regional Development, Public Housing Programs, Institutional & Staff Quarters Scheme, State Economic Development Corporation (SEDCs), were among many public agencies in the provision of LCH	Housing development here also increased. Private Developers Cooperative Society.
4th Malaysia Plan (1981-1985)	Low-cost housing introduced for implementation by both sectors. Public housing schemes, govt. agencies and regional development authority's Housing schemes. Institutional &Staff Accommodation scheme	Private sector housing Construction increased private developers cooperative society.
5th Malaysia Plan (1986-1990)	Renting and selling homes (LCH); Housing schemes delivered here, eg: Public LCH scheme; Housing schemes; Institutional & Staff quarter homes for the poor (junior) staff.	Private sector housing construction increased private developers cooperative society.
6th Malaysia Plan (1991-1995)	Housing schemes delivered here: Public low-cost housing (PLCH) Site & Services Housing Schemes Housing Loan Schemes (HLS) Housing under Land & Regional Dev. Institutional & Staff Quarters Schemes Econ Dev. Agencies housing programs	Private sector housing construction increased Licensed private developers housing Special low-cost housing program Cooperative society.
7th Malaysia Plan (1996-2000)	Same as 6th Malaysia Plan Housing rehabilitation Housing by commercial agencies	Same as 6th Malaysia Plan
8th Malaysia Plan (2001-2005)	Same as 7th Malaysia Plan Eradicate squatters in major urban cities	Same as 7th Malaysia Plan
9th Malaysia Plan (2006-2010)	Public low-cost housing programme more houses. Program Perumahan Rakyat Bersepadu (PPRM) was Implemented for squatters.	The private sector performed more than their planned target of low-cost housing Provision of 200%.
10th Malaysia Plan (2011-2015)	Housing maintenance for public low-cost housing was embarked upon by government for new/maintenance low cost houses. Housing Maintenance Fund established. Government subsidies 30%-75% of construction costs.	Private developers encourage to build-then-sell (BTS) approach with incentives. Developers accredited in usage of skilled and improved construction processes.
11th Malaysia Plan (2016-2020)	Transit houses will be built for youth & young couples in urban areas, subject When there are enough savings to buy 1st home Public-private partnership encouraged.	Public-private partnership (PPP) encouraged to provide homes for LIEs

The 11th Malaysia Plan (2016) reports that the 11th MP is unique to the Malaysian Government; it is the last plan before the year 2020 target of becoming a developed nation. The government will continue to play a major role in meeting the housing needs of targeted LCH group in urban and rural areas by continuing supporting existing successful programmes via financing. This includes programmes under RMR1M, PPR, My First Home Scheme, Youth Housing Scheme, MyHome. Also, houses will be built for youth and young married couples in urban areas, including those proposed under the 1 Malaysia Youth City Programme. This transit houses will be used as a transit for these young Malaysians, to give an opportunity for them to make savings to buy their home. Also, the public-private partnership will be encouraged as a key to solving the demand-supply gap of low-cost housing in Malaysia. Table 2 shows the proposed target for the various programmes under the LCH in the 11th MP (2016-2020). Can this be achieved? Whether achieved or not, there is a template guiding and reminding all relevant agencies and stakeholders to do the needful, this is missing in Nigeria.

Table 2: Proposed Target for LCH during the 11th MP (2016-2020), compilation from 11th Malaysia Plan (2016) as modified.

Programme	Housing Unit
Skim Rumah Pertamaku (SBR)	47,000
Program Perumahan Rakyat (PPR)	50,000
1 Malaysia Civil Servants Housing (PPA1M)	88,000
Rumah Mesra Rakyat 1 Malaysia (RMR1M)	55,000
Total	240,000

Malaysia's housing policies since independence can be summed up in the following order. First, up until recently, there was no national housing policy, it was only unveiled in 2011 (Bahare, 2017). In the absence of formal housing policy document, the federal government initiated five-year Malaysian Plans (MPs) that provided a cursor for housing development (Abdul-Aziz & Kassim, 2011). The details of each plan period have been discussed extensively earlier in this section. 11thMP (2016) identified some of the policies that the government over the years have implemented to overcome the LCH challenge. Unfortunately, the problem is even now obvious as postulated by Zaid (2015) and corroborated by Abdullateef, Seong, and Lee (2016), Bahare (2017).

2.1 Encumbrances Faced by Malaysian Low-Cost Housing Policy

Ebekozien et al. (2017A), (2017B) assert that Malaysia has LCH institutional and regulatory framework policy, but some factors hindered the full implementation of Malaysian LCH policy. These factors are limited land because of the country's location, limited financial resource, limited federal grant to state governments to construct people housing programmes, the bottleneck in approval processes, federalism in LCH provision, leakages in LCH provision, and the top-bottom approach of the five years LCH plan from the federal government. However, the issue of central data-bank cannot be over emphasised. Every planner and administrator need data to coordinate their policies and strategies the formulation of policy. Hence, the incomplete and non-digital registration system did not assist the Malaysian LCH policy implementation. Ebekozien et al. (2017B) assert that over the years, some private developers developed a tactic of avoiding the construction of LCH

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by splitting the project, so that they will not be directed to construct LCH. There are cases where some insist that development of LCH within their project area would devalue the entire project, hence, insist that another location should be given to them to construct the LCH. Most times, the locations are isolated from the cities and when completed, become difficult to get House-buyers. The authors assert that sales of LCH within or after the moratorium have become a profiteering venture to some persons; hence there is need for a reassessment of that portion.

The 11th Malaysia Plan 2016 to 2020 proffer strategic solutions to these identified hindrances such as government should strengthen management and delivery of public housing programmes and promote more efficient and sustainable affordable housing for the people. Others are eliminating housing approvals that are not based on demands; reducing government maintenance funding; improving coordination in planning and implementing through the National Housing Council; encouraging residents' commitment to maintenance, cleanliness and prevention of vandalism; using potential "*Waqf*" and "*Baitullah*" land (land given over for religious or charitable purposes) for development of affordable LCH. Others are the construction of transit housing for youth; augmenting private sector participation; developing maintenance cost sharing for LCH; enhancing access to financing schemes, this is germane if we want to get the issue of LCH for the low-income earners right. The government is expected to review policies, although not to expose the lender, ensure that there is easy access to finance; creating a land bank for future needs; and establishing an integrated database of all affordable housing projects for effective planning and implementation. This is the beauty of the Malaysian housing policies, flexible and pro poor friendly.

3. Nigerian Low-Cost Housing Policy

Ibimilua and Ibitoye (2015) report that Nigerian LCH policy is as old as the history of the Nigeria, however, this section categorises its historical development under the five distinct phases of the pre-independence (before 1960), the post-independence period (1960-1979), the second civilian administration (1979-1983), the military era (1984-1999), and the Third Republic to date (1999 to date). The recorded history of formal intervention into the housing sector in Nigeria dated back to the pre-independence, after the ill-fated outburst of the bubonic plaque of 1928 in Lagos. This necessitated the establishment of the Lagos Executive Development Board (LEDB) in 1955. This signifies the ushering of Nigerian public housing programmes (LCH) intervention (Aribigbola, 2008). The major characteristic of the pre-independence period was the provision of staff quarters for foreigners and other indigenous staff of parastatals and organisations in government. This period witnessed the establishment of Urban Councils in 1946, the Nigerian Building Society in 1955, as well as the Regional Housing Corporation in 1959. The post-independence period experienced some improvements in housing provision during the First National Development Plan period (1962-1968) and the Second National Development Plan 1970-1974).

However, the formulation of the National Council on Housing in 1971 led to further improvement in LCH provision. The Third National Development Plan (1975-1980) made further

improvements on LCH programmes, policies, and delivery in Nigeria. The upgrading of the Nigerian Building Society into Federal Mortgage Bank of Nigeria with the promulgation of Decree No 7 of 1977 also brought some improvements into the LCH delivery in Nigeria. The Land Use Decree (LUD) of 1978, this was promulgated to guarantee access to land by all Nigerians, came to stabilise the ownership and acquisition of land, yet no positive impact. Furthermore, during the period, the Constitution of the Federal Republic of Nigeria (1979) laid emphasized on the significant of local building materials and the relevance of labour and construction industry. In that same year, the Employees Housing Scheme Decree No 54 of 1979 was promulgated. This decree made provision for staff LCH estates.

Ibimilua and Ibitoye (2015) argued that the LCH policy in the 1980s and 1990s was how divided society was being created. The rural areas were neglected, and the LCH stocks in the urban areas were improved upon, yet not enough. This was because of the high rate of migration to urban cities, subsequently resulted in LCH shortage in urban centres. The military era witnessed further improvements in housing policies and delivery. This was facilitated by the promulgation of the Mortgage Institutions Decree No 53 of 1989. The decree enhanced the specific objectives of the National Housing Policy. Furthermore, the Economic Liberalisation Policy of Babangida's administration supported the participation of the private organisation in LCH delivery. This was closely followed by the promulgation of the Urban and Regional Planning Decree 88 of 1992 as well as the Nigerian National Housing Fund (NHF) Decree No 3 of 1992. The NHF was saddled with the responsibility of ensuring a continuous flow of fund for LCH construction and delivery; was the mission accomplished? No! It may interest you to note that before the millennium, the policy of "housing for all in the year 2000" was formulated. This policy was thoroughly pursued, but it was besieged by administrative bottlenecks as usual, which made the policy difficult to be realized by the year 2000, this is unfortunate. Nevertheless, in the year 2002, the Housing and Urban Development Policy was formulated. This policy was a corrective measure, to correct the inconsistencies of the Land Use Act as well as to allow finance and ownership to operate in a free market economy.

Ibem, Anosike, and Azuh (2011) report that between 1975 and 2010, several LCH programmes involving direct construction by the government were initiated by both the Federal Military and Civilian Governments in Nigeria, for example, the National LCH Scheme (1975-1980), Shagari's LCH Programme (1980-1985), the National Housing Programme (1994-1995), the National Prototype Housing Programme (2000-2003), the Presidential Housing Mandate Scheme (PMHS) (2004-2006) and PPP housing schemes. Although there are conflicting figures on the actual number of LCH units completed in each of these programmes, Table 3 reveals that between 1962 and 2010 a total of 653,271 housing units were expected to be constructed in the different LCH schemes across the country. However, only 95,594 housing units were constructed. Also, Table 3 shows that none of the previous public housing programmes achieved up to 50 percent of the targeted number of housing units. Apart from the period between 2006 and 2010 in which there was 43 percent

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achievement, yet below 50%. UN-HABITAT (2010) opines that 61.9% of urban population in Nigeria as at 2010 lives in slums. Thus, the impact of these programmes in addressing the existing housing problems among LIEs in the country can best be described as negligible.

Odunsi (2017) reports that in August 2017, Central Bank of Nigeria (CBN) rolled out a scheme called "My Own Home". We hope this housing programme will succeed since it is joint finance by the World Bank, Federal Ministry of Finance, Federal Ministry of Power, Works and Housing, Federal Ministry of Justice, Mortgage Banking Association of Nigeria, as well as Primary Mortgage Banks through equity in the Nigeria Mortgage Refinance Company. The sadden episode of this scheme is that about 80% of the LIEs will not be able to meet the minimum requirements to participate, such as down payment, collateral, guarantor, and evidence of regular income. For an average LIE in Nigeria, it is as good as nothing. This again justified the reason for the only option available to Nigerians is self-help provision. There is no hope from the government, even the few states that construct scanty houses, the prices are not within what the LIEs can afford. There is a need for Nigerian Government to send delegates to Malaysia to study various policies and programmes of Malaysian LCH schemes, including some Malaysian States LCH programmes, complementing the federal, for example Sarawak, Selangor, and Johor.

Table 3: Low-cost Housing Schemes by the Federal Government of Nigeria (1962- 2010)
Compilation from Onibokun (1985), UN-HABITAT (2006), Ibem et al. (2011).

Period	Proposed # of housing units	# housing units produced	Percentage achievement
1962-1968	61,000	500	0.81
1971-1974	59,000	7,080	12
1975-1980	202,000	30,000	14.85
1981-1985	180,000	47, 234	26.24
1986-1999	121,000	5,500	4.55
2000-2003	20,000	-	-
2004-2006	18,000	840	4.67
2006-2010	10,271	4,440	43.23
TOTAL	**653,271**	**95,594**	**14.63**

3.1 Encumbrances Faced by Nigerian Low-Cost Housing Policy

Abdullahi (2013), Olawale, Lawal, and Alabi (2015) assert that not until 1991, Nigeria cannot be said to have a National Housing Policy (NHP), policies regulatory housing prior this were just the integral parts of the National Development Plans. Twenty years later, the government confessed openly its inability to achieve the then set objectives and went ahead with to review the NHP. In 2012, Nigeria received her latest NHP that promised Nigerians "real mass housing which the country has been dreaming of". Five years later, now 2017, Nigeria with an increasing population of over 170 million, there is no evidence of providing solutions to the shortage of LCH, and housing the poorest of the poor. The government promised has become a nightmare in the eyes of Nigerians, most especially in the eyes of LIEs. Perhaps, one can say that Nigeria lacks LCH Institutional and regulatory policy framework compared to Malaysia. Akintomide (2016) reports that from a figure released in 2015 by the UN, Nigeria has an estimated figure of 24.4 million homeless citizens. This calls for concern and worries as the figure is alarming. This was the consequence of many factors such as corruption in the implementation of various past LCH policies, rapid urbanisation, poverty

and terror acts by the Boko-Haram terrorists' organisation which had displaced over 650,000 Nigerians internally and 70,000 more as refugees in neighbouring countries. Hence, there is need to identify the challenges facing these various LCH policies in Nigeria.

Several studies have been conducted by researchers to propel reasons why the past government and states supported housing policy in Nigeria neglected to give the coveted outcomes, for eaxample Ibem et al. (2011), Ibem, Opoko and Aduwo (2013), Abdullahi (2013), Olawale, Lawal, and Alabi (2015), Akintomide (2016), just to mention a few. No one study talk about open registration system as key to the provision of LCH, perhaps because the NHP did not categorically state it as key to achieving LCH. All over the world, without data, policy planning, formulation, and implementation are all fallacy. A large portion of the findings from the authors reveals that lax enforcement, bribery and corruption, lack of adequate funding, corruption in the allocation of complete housing units, political interference and the lack of adequate monitoring and evaluation of the programmes are the major cause of the backwardness of LCH provision in Nigeria. For instance, Ibem et al. (2013) explored the results of the PMHS started by the Obasanjo's organisation to give 18,000 LCH units between 2004 and 2006 utilising nearby local building materials and found that the plan was actualised in not very many states in the nation with the modest number of LCH provided. The difficulties of that scheme were identified as poor design and implementation strategies, inadequate funding and low organisational capacity of the three public agencies: National Building and Road Research Institute (NIBRRI), Association of Housing Corporations of Nigeria (AHCN) and the FMBN charged with the responsibility of implement that scheme. NHP among other functions have a responsibility to mobilize primary mortgage institutions to assist Nigerians desirous of purchasing LCH to do so, this they failed because of lack of institutional framework and open registration system. Government-sponsored mass housing schemes are supposed to be based on a three-tier institutional framework, involving Federal, State and Local Government as outlined in the National Housing Policy in 1991 and 2012. This three-tier of governments have failed in their constitutional obligation to the masses in respect to housing provision.

Nigerian Government responsibility regarding the 2012 NHP objectives and strategies have more than 80% role to play, for example, grant to LIEs, subsidies to targeted group, Land Use Act Review, strengthen institution for implementation of NHP, establish secondary mortgage market, encourage training of skilled manpower for mass LCH production, etc., but government yet to meet up to 20% of these objectives, perhaps, Nigerians that belong to the target group have a long way to go. Akintomide (2016) reports that one of the uniqueness of the 2012 NHP is the emphasis on private sector participation in LCH provision (private developers), finance and investment (financial institutions) but there is a lacuna in the policy. The NHP fails to state sanctions for defaulter. In Malaysia, this was well documented and sanctions are melted to private developers who default. NHP perhaps give room for laxity with a resultant effect of poor implementation. Perhaps, this is because the Nigerian Government does not lead by example like their counterpart (Malaysia). The Malaysian Government till date is a provider and facilitator of LCH to the LIEs.

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Thus, the Malaysian LCH policy model will assist Nigerian Government if only the political will is there to do the needful for the masses that elected them into their various political positions from the local government to federal government level. Some school of thought believes that the quote "I belong to everybody, and I belong to nobody" a quote by the President of the Federal Republic of Nigeria, during his sworn-in-ceremony on 29th May 2015, although alleged plagiarised Charles De Gaulle's quote, as alleged by the opposition parties in the news media is only on paper. Nigerians are still finding it difficult to believe that after two and a half years of the present administration of President Buhari, housing for the poor is not having any direction or blue print for future hope. Olorode and Igbolo (2015) assert that this is a presumed government that came to fight for the masses, nothing seems to be working out, all promises made before the election as gone to "voice mail", and this is saddened. Olukotun (2015) correctly in The Punch May 29, 2015: p. 96, doubted the feasibility of the promises to "grow the economy by 12 per cent annually, mount an elaborate social welfare programme … [employing] 25 million people [with] N5,000 monthly and dish out one free meal a day to all public primary school pupils …[get] the naira to be at par with the dollar, give Nigerians electricity round the clock", all these mounted to zero.

4. Summary of Similarities and Differences of Both Countries LCH Policies

Table 4 shows the differences and similarities of Malaysian and Nigerian LCH policies respectively. Table 4 is divided into two sections; the first section outlines the similarities that are common to both countries LCH policy, although with a slight difference in some instances, while the second section highlights the differences. Table 4 reveals that in Nigeria, self-help is one of the means of LCH provision. This is because the Nigerian Government Institutional framework and regulatory policies failed to address the needs of the LIEs. To worst the scenario, there is no policy that instructs the private developers to make provision for housing LIEs in their housing project. The Nigerian Government have a lot to learn from the Malaysian Government LCH policy in respect to price control, cross subsidization, 30% provision for LIEs, LCH subsidies in different forms both from the federal and state governments to LIEs house-buyers. Hence, these findings corroborate Abdullahi (2013) submission that country with many developmental strides, for example Malaysia seems to perform more in implementation of LCH policies and programmes than the less developmental country, for example, Nigeria.

The provision of LCH scheme in Nigeria seem to have been either forgotten or has eluded the government, leaving the LIEs to their fate. In the 11th MP (2016-2020), Malaysian Government plans to provide 240,000 units of LCH via various programmes. In Nigeria, there is no template or figure to show what the federal plans to do, only few states came up with shoddy plans that is not financial viable and social accessible to the LIEs. For example, Lagos State, can LIEs afford to buy a house of N10,000,000:00 (Ten Million Naira Only) (Akintomide, 2016)? The Nigerian Government has a lot to do if this LCH policy would succeed. The Nigerian Federal Government LCH scheme from 1962-2010 was 95,594 for a population of over 170 million, refer to Table 3,

while the Malaysian Federal Government LCH scheme only from 1971-2010 was 604,517 for a population of 31.7million (Abdul-Aziz, Tah, Olanrewaju, & Ahmed, 2017). However, the implementation and monitoring of the open registration system (ORS) of both countries are weak. In the case of Nigeria, we need to start afresh while in the case of Malaysia, there is need to resuscitate the existing ORS, most especially at state level. The relevance of database in planning and implementation of policies and programmes cannot be over emphasised.

Table 4: Similarities and Differences of Both Countries LCH Policies. (Compilation from Asek (2007), Aigbokhan (2008), Aribigbola (2008), Ibimilua and Ibitoye (2015), 11th Malaysia Plan (2016), Abdul-Aziz et al. (2017), Ebekozien et al. (2017A), (2017B), World Bank (2017))

Theme	Malaysia	Nigeria
Similarities		
1.Development category	Developing country but aiming to become a developed nation by 2020 (feasible).	Developing country, in 2000, started aiming to become developed nation by 2020 (not feasible)
2.Policy target	Low-income earners in the country.	Low-income earners in the country.
3.Government system/colonisation	The federal system, colonised by British Government, and independence in 1957.	The federal system, colonised by British Government, and independence in 1960.
4.National Housing Policy (NHP)	National Housing Policy 1991, 2011, faulty open registration system (ORS).	NHP 1991, 2002, 2006, 2012, faulty open registration system (ORS), no database.
5.Land admin.	State matters.	State matters.
6.Aim of policy	Make home affordable and accessible to the LIEs.	Make home affordable and accessible to the LIEs.
Differences		
1.Providers of LCH	Public and private developers	More of self-help, few public and private developers
2.Ceiling price, target income, sales within moratorium.	RM 42, 000 per unit for household income not exceeding RM 2,500/month, cannot sell within 10 years.	No established parameter. It is free for all, can sell same day if lucky to acquire one. There is no regulation and anti-poor.
3.Price control and cross subsidisation	These two concepts are to address the needs of the LIEs. Although not very effective but in operation.	The federal government does not know if the poor needs home, only a few states but price control and cross subsidisation are missing.
4.Institutional and regulatory framework	There is LCH Institutional and regulatory framework policy, although need to be strengthened for better efficiency.	Lacks LCH Institutional and regulatory framework policy, hence give room for “anything can go syndrome”.
5.Government role	The federal provide grant and loan for housing while states complement with their various LCH programmes for the LIEs. The federal and state government gives subsidies to qualified persons, hence reduced rejection rate.	Table 3 reveals that LIEs is on their own, few projects that are supposed to be for the LIEs are sold to the highest bidders. There is no control like Malaysia, hence, of no resultant effect to the LIEs.
6.Private developer’s role	The law of the land direct private developer to construct 30% of LCH for 10 acres and above. This varies from state to state.	It is free for all, so private developers do what they like even if the development area is 50 acres.
7.Individual role	The participation of individual is low.	The participation of individual is high. Most LIEs acquired their homes via this method.
7.Leakages in LCH provision	Evidence of leakages in LCH provision (Ebekozien et al., 2017B).	No parameter for measurement, hence, leakage is an understatement.
8.Building plan approval	The districts/local authorities are the ones in charge of building plan approval.	The state governments housing and planning ministry is the one in charge of building plan approval.
9.Level of LCH Policy implementation	Five years housing plan (every five years), guided by NHP 2011, implementation above 50%.	The NHP last reviewed was 2012, implementation only on paper, less than 10%.
10. Policies	Housing policies promote pro-poor growth and reduce disparities in access to financial credit.	Housing policies promote inequality between the poor and rich. Also, there is a high disparity in access to financial credit.
11. Land/Housing units (1962-2010)	Limited land and 604,517 units, government lead by example.	Surplus land, no policy direction and 95,594 units, poor commitment from government.
12. Poverty lines	3.8 as at 2009, 0.6 as at 2014.	46 as at 2009. This calls for concern.

5. Conclusion

Although there are limitations from both countries LCH policies, this paper concluded that the Nigerian Government has a lot to learn from the Malaysian LCH policies. In the Nigerian context,

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LCH policy strategy should be government-driven with a functional institutional framework for implementation and monitoring. This should be backed-up with necessary legislative laws and funding for better efficiency and continuity. Also, Nigerian Government should as a matter of urgent necessity embarks on cost-effective and LCH reforms to create opportunities for the poor, and thereby promote pro-poor home-ownership policies just like the Malaysia approach. There is need for the Nigerian Government to study the Malaysian LCH Policies, if genuinely, the wishes of the masses to be sheltered is their goal.

In the Malaysian context, there is need for more cooperation, consultation, sharing knowledge within the stakeholders, setting aside politics to getting the Malaysian LCH provision to the global standard and a resultant effect of making homes available to every Malaysian household before the year 2020. Provision of Malaysian LCH by private developers should henceforth be based on targeted cumulative acres/units as it applies to state by state as against per project. This would put to check developers that have over the years tactically avoided the provision of LCH by "project splitting". Also, Malaysian Government should create an agency/unit/department within the Ministry of Housing with sole responsibility to coordinate all sales, auctions and rental issues with LCH. The unit among others will ensure that only LIEs should be eligible to participate in auction/sales/rent of LCH. This unit should be back-up with legislative power and well funded to buy LCH auctioned property and recycle via the waiting eligible list. This measure would mitigate illegal transactions and profiteering that takes place in LCH market.

There is the need for both countries to revamp their open registration system to ensure easy monitoring and implementation of policies. This paper has succeeded in given useful and practicable housing policies to the Nigerian Government to solve problems confronting LIEs in the society. Therefore, sustainability of LCH provision for LIEs is inevitable; hence, LCH policies and programmes should be economically viable, socially acceptable, and technically feasible with all parties genuinely involved. This paper therefore recommends a further study to test the suggested new measures in the field that would strengthen and improve the Malaysian LCH Policies.

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