Governing Illegal Settlements: Housing Policy in Singapore and Australia

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Abstract: The increase in population has an impact on the proliferation of illegal settlements. This study determines and analyzes housing policies and administrative law enforcement about illegal settlements. The study uses normative legal research, which compares legal issues in two countries, Singapore and Australia. This research is descriptive, using both statute and conceptual approaches. The concept of administrative law enforcement and protecting citizens' fundamental rights are used as the basis for our analysis, combining it with legal system theory and administrative law enforcement. The research results show that, in substance, Singapore has a housing policy through Housing & Development Board, which is carried out on a massive scale and is quite successful in dealing with illegal settlements in urban areas about the size of the country's territory. Structurally, government institutions carry out administrative law enforcement through warnings and demolitions. Meanwhile, Australia has not been entirely successful, even though collaboration has been carried out between governments through Australia for Affordable Housing, the private sector, and housing communities. Australia enforces the law by issuing orders to stop using unauthorized buildings and imposing financial sanctions. Affordable and fair housing policies that the enforcement of administrative law can accompany are more effective in reducing illegal settlements than relying solely on the enforcement of administrative law alone or even criminal law. According to a culture of legal awareness, settlers who face various economic and social pressures are more difficult to discipline.

Keywords: Housing; Illegal Settlements; Land; Policy;

INTRODUCTION

Data from the United Nations shows that the percentage of the world's population living in cities continue to increase year after year.[1] Even in 2050, urban residents are estimated to reach 70% of the entire human population.[2] Worse, around 80% of the city's population lives in informal and illegal settlements.[3] It is not uncommon for settlers to occupy state lands. This causes various social inequalities and health and environmental damage. The continued increase in urban occupation seriously

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[1] Mohammad Sina Jahangir and Sanaz Moghim, 'Assessment of the Urban Heat Island in the City of Tehran Using Reliability Methods', *Atmospheric Research*, 225 (2019), 144–56 https://doi.org/10.1016/j.atmosres.2019.03.038

[2] Mehdi Bokaie and others, 'Assessment of Urban Heat Island Based on the Relationship between Land Surface Temperature and Land Use/ Land Cover in Tehran', *Sustainable Cities and Society*, 23 (2016), 94–104 https://doi.org/10.1016/j.scs.2016.03.009

[3] Saeed Zanganeh Shahraki and others, 'Fringe More than Context: Perceived Quality of Life in Informal Settlements in a Developing Country: The Case of Kabul, Afghanistan', *Sustainable Cities and Society*, 63 (2020), 102494 https://doi.org/10.1016/j.scs.2020.102494

threatens ecological resources and can limit urban facilities.[4] Similarly, illegal settlers have limitations in accessing their rights as citizens. On the other hand, the state's obligation to guarantee the fundamental rights of its citizens, such as the right to earn a living and a place to live, extends beyond the issue of adequate housing. To fulfill these rights, the state implements development initiatives to achieve equilibrium and prosperity. Development must refer to the need for land for residence and increasing population growth. The issue of land availability—residence and land rights—needs to be regulated fairly.

Population density is becoming increasingly high, in line with the demand for housing. The imbalance between the need for housing and available land is increasing, so the availability of housing is no longer accessible. Finally, illegal or informal settlements emerged and mushroomed. More than that, the increase in population quantity impacts the need to provide residential infrastructure and facilities. The scarcity of land in the city exacerbates the state of illegal settlements, as the city's capacity to provide affordable and livable housing infrastructure and facilities fails to match the level of housing demands.[5] As a result, a residential area receives a load that exceeds its environment's carrying capacity and tends to become a slum. Another problem that often occurs due to the imbalance between population and available land is the emergence of illegal settlements, where many people build buildings on the land they do not have rights to.[6] Not only that, but the prices of land and decent houses are also rising, and they are not even proportionate to people's purchasing power. New urban residents' arrival exacerbates high dissatisfaction with the demand for land, infrastructure, and housing among low- and middle-income groups.[7]

Illegal settlements are residential areas in urban areas that are inhabited by economically disadvantaged people. These communities usually do not have access to their private land, so they build buildings on empty land and claim private ownership. Illegal settlements develop on illegal land or do not receive permission to build buildings on the land from the right owner. This status becomes illegal, so infrastructure and services are usually inadequate. In general, illegal settlements are also classified as slums because people who build buildings on illegal land indeed ignore various aspects of development. In other words, infrastructure, facilities, and resources are minimal and inadequate to support their daily activities.[8] Therefore, equitable development requires comprehensive and efficient handling efforts, particularly for those who continue to live on land they do not own and are not

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[4] Keramatollah Ziari and others, 'Environmental Sustainability in Cities by Biophilic City Approach: A Case Study of Tehran', *International Journal of Urban Sciences*, 22.4 (2018), 486–516 https://doi.org/10.1080/12265934.2018.1425153

[5] Elena Romanova, 'Increase in Population Density and Aggravation of Social and Psychological Problems in Areas with High-Rise Construction', *E3S Web of Conferences*, 33 (2018), 03061 https://doi.org/10.1051/e3sconf/20183303061

[6] David Miles, 'Population Density, House Prices and Mortgage Design', *Scottish Journal of Political Economy*, 59.5 (2012), 444–66 https://doi.org/10.1111/j.1467-9485.2012.00589.x

[7] Ernest Uwayezu and Walter T. de Vries, 'Access to Affordable Houses for the Low-Income Urban Dwellers in Kigali: Analysis Based on Sale Prices', *Land*, 9.3 (2020), 85 https://doi.org/10.3390/land9030085

[8] *The Routledge Handbook of Latin American Development*, ed. by Julie Cupples, Marcela Palomino-Schalscha, and Manuel Prieto (London ; New York : Routledge, 2019.: Routledge, 2018) https://doi.org/10.4324/9781315162935

suitable for. The high demand for residential housing causes individuals or legal entities to shift land solely to fulfill personal interests, harming many parties. Land use must be regulated according to the circumstances and nature of the rights to provide benefits to the landowner, community, and state. However, in certain circumstances, this does not mean that public interests will overwhelm private interests. The government also pays attention to personal interests, where public and individual interests must be balanced. This must also be the case with informal or illegal settlements on state-owned land. The state must fulfill its obligation to provide housing for the community. Still, it cannot simply justify using state-owned land for the personal interests of informal settlers. If public facilities are to be constructed on the land, this informal settlement could potentially violate the community's rights.

Large cities in Australia are experiencing an increase in the quantity of development, causing urbanization to continue; they even experienced a housing affordability crisis. Australia is trying to overcome the problem of illegal settlements. Australia introduced the Australia for Affordable Housing (AAH) policy. This program must be able to influence market prices for more affordable housing so that people living in illegal settlements can live in decent homes.[9] In contrast to Singapore, a city-state, it does not have to work with a tight public budget like most other countries. In comparison to other Asian cities, Singapore does not have villages, so there are no migrants from rural areas who are constantly coming to the town, which affects the urban housing supply. Singapore also cannot be said to have successfully delivered the public housing policies established by the state in the 1960s and early 1970s. Singapore used to be one of the countries with the world's worst illegal settlement areas. In this case, Singapore made significant changes by issuing a Housing Development Board (HDB) policy, eliminating illicit settlements in Singapore. Property ownership mainly consists of freehold, leasehold, and land in perpetuity.[10] However, this does not mean that illegal settlements do not exist in Singapore today.

The government's attention to land is one sector significant for the sustainability of life because settlements have a strategic function: to increase cultural development and improve future generations of society. Research by Retno Susanti et al. (2016) states that building density must be controlled to achieve sustainable development. Urban development must shift from physical, economic, and social aspects to an environmental and sustainable agenda.[11] Therefore, the development of settlements on land whose ownership status is clear and feasible can improve the standard of living and welfare of the surrounding community and accommodate the community's economic activities while still paying attention to regional conditions, potential, and problems to realize sustainable development. Efforts related to handling illegal settlements must continue and be carried out immediately by the Government so that

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[9] Alan Morris and others, 'Australian Local Governments and Affordable Housing: Challenges and Possibilities', *The Economic and Labour Relations Review*, 31.1 (2020), 14–33 https://doi.org/10.1177/1035304619880135

[10] Tony Tan Keng Joo and Tai-Chee Wong, 'Public Housing in Singapore: A Sustainable Housing Form and Development', in *Spatial Planning for a Sustainable Singapore* (Dordrecht: Springer Netherlands, 2008), pp. 135–50 https://doi.org/10.1007/978-1-4020-6542-2_8

[11] Retno Susanti and others, 'Smart Growth, Smart City and Density: In Search of The Appropriate Indicator for Residential Density in Indonesia', *Procedia - Social and Behavioral Sciences*, 227 (2016), 194–201 https://doi.org/10.1016/j.sbspro.2016.06.062

land use rights can be maximized for the public interest. It is not uncommon to provide outreach and verbal warnings to the community. However, these efforts are considered less effective because it is proven that many illegal settlements are still growing. This is because there is no follow-up from the Government, so the people who have occupied the land for a long time feel that their existence is recognized.

Still, law enforcement in cases of illegal settlements must also be carried out in line with various policy solutions to facilitate adequate housing, which are sometimes unregulated. Regulation and enforcement of rules that do not work will make it difficult to control illegal settlements and will impact the level of prosperity and health of a city. In previous research conducted by Jiren Zhu et al., the outbreak of the COVID-19 pandemic showed the critical role of social distancing and hygiene practices in reducing virus transmission, thus showing the high risk of infection in urban informal housing. In Singapore, the number of migrant workers living in dormitories who are infected is three hundred times greater than the number of local urban residents who are infected. This research demonstrates the importance of planning interventions for living conditions in informal housing and emphasizes the need for active government reform of building regulations and healthcare systems to improve health. Disadvantaged groups and create a more inclusive and healthy city for the community.[12] Therefore, policies and law enforcement in informal housing must be relevant to existing settlement needs.

Legal violations can occur when implementing laws or policies, so law enforcement needs to be implemented as part of state jurisdiction. The concept of norm enforcement in Administrative Law is called *"Eenzijdige Handhaving Rech door Overheid,"* namely the authority of state administration to straighten out violations of state administrative law norms to end these violations by taking concrete action. Enforcement of state administrative legal norms is the realization of legal order in the context of protecting public interests. Then came the use of administrative sanctions, which is the application of government authority. The types of sanctions in state administrative law include: Governmental Coercion *(bestuursdwang)*, Withdrawal of favorable decisions (permits, payments, subsidies), Administrative fines, and Forced money *(dwangsom)*. Research conducted by Adam Moore (2022), for example, shows that the enforcement of the Colombian National Police Code includes a series of repressive measures such as demolitions and fines to prevent development carried out in violation of local urban planning norms and regulations.[13]

In legal system theory, most minor law enforcement cases in illegal settlements depend on three parameters, viz. legal substance, legal structure, and culture. In substance, this study provides evidence of how housing arrangements in Singapore and Australia respond to illegal settlement. In terms of structure, the study looks at the institutions that work for enforcement. Each country's history is closely linked to its legal culture. In Singapore, illegal settlements violate the provisions of the Land Acquisition Act of 1966 and the Land Acquisition Act of 1967. Meanwhile, in Australia,

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[12] Pranita Shrestha, Nicole Gurran, and Sophia Maalsen, 'Informal Housing Practices', *International Journal of Housing Policy*, 21.2 (2021), 157–68 https://doi.org/10.1080/19491247.2021.1893982
[13] Adam Moore, Flávio Eiró, and Martijn Koster, 'Illegal Housing in Medellín: Autoconstruction and the Materiality of Hope', *Latin American Politics and Society*, 64.4 (2022), 94–118 https://doi.org/10.1017/lap.2022.31

they can violate the provisions of the Australian property codes (in each state or territory of Australia). This is the basis for the fact that residential construction is not by environmental development permits because the land they occupy is state land - government uses rights, where buildings cannot be built without permission from the rightful person so that they can be subject to administrative sanctions.

The law of efficiency is the allocation of responsibilities between people involved in interacting activities in such a way as to maximize joint value or some amount for the same thing, minimizing the costs of joint activities.[14] In this case, the government should manage its assets, as improper asset management can lead to financial losses for the regional government. It can be seen that buildings are not only built on land but also bought and sold so that the government, as the right owner, experiences economic losses. In addition, the government encounters difficulties in effectively utilizing these assets. The existence of illegal settlements also causes the emergence of slum areas, damage to city parks, reduced absorption functions, urban spatial planning that is not by its designation and use, poor environmental sanitation, disruption of land use functions, and the emergence of conflicts and land disputes, resulting in social insecurity. Informal or illegal settlers are commonly found in cities in developing countries, but that does not mean they are not in developed countries. Therefore, existing rules and policies must be relevant to society's rapid development. Moreover, law enforcement needs to be balanced. This paper aims to gather evidence of administrative law enforcement in existing illegal settlements in Singapore and Australia and other policies that have successfully reduced illegal settlements on use-right land.

METHOD

This article uses normative legal research to compare housing policy problems in two countries, namely Singapore and Australia. This study is descriptive, using a case approach in each country as well as a conceptual approach. The concepts of administrative law enforcement and protection of citizens' fundamental rights are used as the basis for analysis. Additionally, this article focuses on policy analysis rather than a legal study. HDB and AAH policies were the main focus of the first discussion. Subsequently, this article addresses the problem of regulating the handling of illegal settlements with law enforcement. The article also uses legal system theory to scrutinize each country's substance, structure, and legal culture, seeking evidence of current legal enforcement measures against illegal settlements. Primary data and secondary data are the types of data used. Techniques for collecting legal materials through library studies of documents, archives, books, and proven scientific research results.[15]

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[14] Anthony Niblett, 'On the Efficiency of the Common Law: An Application to the Recovery of Rewards', *European Journal of Law and Economics*, 43.3 (2017), 393–417 https://doi.org/10.1007/s10657-015-9520-1

[15] M. Misbahul Mujib and Mustari Kurniawati Muchlas, *Achievements and Challenges of Human Rights Protection Policy in Realizing Good Governance in Indonesia and China*, Journal of Human Rights, Culture and Legal System, 2023, III https://doi.org/10.53955/jhcls.v3i2.98

RESULT AND DISCUSSION

Accelerating Urban Space Growth to Cope Illegal Settlement with HDB Housing Program in Singapore

Historically, Singapore was a former British colony. Starting in the 1920s, the British colonial government attempted to address a severe housing shortage by providing affordable public housing developed by the Singapore Improvement Trust. [16] However, this project was impractical because it could only build 23,000 units in 32 years. The housing shortage is at crisis levels as it was exacerbated by wartime destruction at the end of World War II. The situation was exacerbated by the influx of people fleeing to Singapore due to attacks by communist guerrillas during the Malayan Emergency of 1948 – 1960 and the British response, which included the forced relocation of half a million people, mainly ethnic Chinese, from rural areas of the Malay Peninsula. Singapore has a high population density due to its limited territory, making it difficult for lower-class people to find a decent place.[17]

Before becoming a developed country, Singapore had a high level of illegal settlements. In the 1960s, when Singapore had just become independent, its population was 1.89 million, around 1.3 million of whom were poor and lived in slum areas, including on riverbanks or anywhere that could be used to build settlements. Loh Kah Seng's research stated that in post-war Singapore, many low-income Chinese residents moved to informal settlements that were increasingly expanding on the city's outskirts. These informal settlements gave rise to a semi-autonomous way of life, characterized by large numbers of unemployed and coexistence with wild pigs and fowl. Villages that were unhealthy, crowded, and dangerous. Based on the history of Singapore, which was a former colony, it was closely linked to territorial ownership interests. Land is a valuable asset for society, especially in urban communities, which are increasingly dense and lack land to build buildings. Culturally, Singaporean society before independence also experienced terrible times in terms of housing. They are even said to live in a semi-autonomous way. Such a culture may still be carried over. Therefore, several illegal or informal settlements have still been found. Without permission, settlers live in inadequate housing on the city's outskirts of Singapore.

Talking about the legal substance, after Singapore gained independence in 1965, the government was increasingly pressured to take a stance regarding land ownership in Singapore because they needed land for development projects. Singapore regulates the rights of its citizens through The Constitution of the Republic of Singapore, which governs rights such as the right to life, the right to receive legal aid, the right to freedom from slavery and forced labor, the right to equal and equal protection, and the same treatment. In the eyes of the law, the right to freedom of religion, the right to receive a reasonable and adequate education, the right to citizenship, the right to commonwealth citizenship, the right to participate in government, special rights for Malaysians, etc. Article 13, paragraph (2) of the Singapore Constitution provides the right to free movement and residence.

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[16] Adrian T.H. Kuah, 'Tropical Urbanisation and the Life of Public Housing in Singapore', *ETropic: Electronic Journal of Studies in the Tropics*, 17.1 (2018) https://doi.org/10.25120/etropic.17.1.2018.3641

[17] Phillip Deery, 'Malaya, 1948: Britain's Asian Cold War?', *Journal of Cold War Studies*, 9.1 (2007), 29–54 https://doi.org/10.1162/jcws.2007.9.1.29

Apart from the constitution, Singapore has laws that play an important role in housing and land policy resolutions. The government also paid much attention to amendments to the state's laws regarding land acquisition in the early 1960s. The Land Acquisition Act of 1966 was an important step in Singapore's housing policy and economic development, with a major redistributive effect. In the Land Acquisition Law, which was passed in 1966, there are provisions where the state is given broad powers to acquire land, namely: 1) for any public purpose; 2) by any person, company, or legal entity, for any work or business that, according to the Minister, is in the public interest or public use or for the public interest; or 3) for residential, commercial, or industrial purposes. This law allows the government to purchase land at affordable prices for the creation of housing projects. Initially, the housing was only for rent, but then its designation was changed to national priority housing. This aims to help national stability.[18]

In 1967, the Land Acquisition Law came into effect. The regulation allows the government to carry out mandatory land acquisitions for public development reasons. This regulation also governs the compensation given to landowners whose land was taken over. The compensation was based on the value of the land before development, so the government was able to acquire land quickly, resulting in a total land area of 177 km^2, about a third of Singapore's total land area in 1984. In 1985, the government had the most significant land holdings in Singapore, at 76.2%.[19] Singapore has the precise substance of protecting people's fundamental rights.[20] To support various government programs to provide decent and affordable housing, several regulations are used as references for settlement regulation in Singapore, including the Housing Property Law; the Residential Property Law provides a balance between ensuring that the limited supply of residential property in Singapore remains the right of primarily Singapore citizens while allowing selected foreigners who have demonstrated social commitment and made significant economic contributions to Singapore also to own their own landed homes.

Foreigners who wish to purchase residential property must apply to the Land Transaction Approval Unit of the Singapore Land Authority (SLA). The Land Acquisition Law is the primary law that allows the mandatory acquisition of private land for public purposes, such as the development of transportation infrastructure and public housing. The Land Ownership (Strata) Act enables en bloc sales, or collective sales, of private strata developments, thereby facilitating redevelopment and bolstering urban renewal. In addition, SLA provides land administration services, for which the integrity of the land allocation and administration process is critical to meeting ever-changing socio-economic needs. Land rights have social and economic significance because they are the basis for many financial and business activities. The constitution guarantees adequate housing. The constitution also regulates land policies

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[18] Alice Christudason, 'Legislation Affecting Common Property Management in Singapore', *Property Management*, 26.3 (2008), 207–19 https://doi.org/10.1108/02637470810879242
[19] Mărgărit-Mircea NISTOR, Harianto RAHARDJO, and Alfrendo SATYANAGA, 'Development Assessment Of The Singapore Land: A Gis Spatial-Temporal Approach Based On Land Cover Analysis', *Geographia Technica*, 14.2 (2019), 60–73 https://doi.org/10.21163/GT_2019.142.06
[20] Stephan Ortmann, 'Singapore: The Politics of Inventing National Identity', *Journal of Current Southeast Asian Affairs*, 28.4 (2009), 23–46. https://doi.org/10.1177/186810340902800402

to address all development needs in a less significant country than other Asian nations. In addition, the HDB seriously implements housing policies, yielding substantial results.

Despite this, Singapore continues to struggle with social problems in the form of poverty, and the lack of adequate housing for its people and citizens is still common. A 1966 HDB report estimated that 300,000 people lived in squatter settlements and 250,000 people lived in slum shophouses in the Central Region. Therefore, the government dramatically emphasizes controlling slums and illegal settlements on state lands. From a structural perspective, HDB is crucial in addressing illegal settlements by providing decent housing. HDB improves the quality of life of people with low incomes by increasing access to housing, including the creation of home ownership and ownership in the community.[21] HDB is a state institution under the auspices of the Singapore Ministry of National Development, which was in charge of housing in Singapore in the 1960s and had a resolution program so that people had the right to adequate housing, building lots of flats to meet housing needs.[22] Land acquisition for public development allowed the state to relocate its residents to public housing built on top of urban villages. Furthermore, it is stated that there was a transformation from squatters to very modernist citizens. This is because state regulations determine housing regulations.[23]

The HDB's main priority is building as much housing as possible because it estimates that an average of 14,000 housing units are needed annually. The program's primary focus was initially on low-income family rentals. However, the government introduced the Home Ownership Scheme in 1966 to help people buy flats (apartments) with a 99-year lease term. In its high commitment to helping low-income families, Singapore also provides a home ownership policy with a home ownership scheme and an innovative self-supporting mortgage financial system taken from Singapore's Central Provident Fund (CPF) borrowers.[24] Through this program, Singapore is described as a good example of a developmentalist approach to social welfare that successfully aligns economic and social goals. [25] In 1968, a further incentive was added by allowing people to use their savings from the CFP for a down payment. These efforts were unsuccessful in drawing settlers out of their informal settlements. Settlors are permitted to use as down payment and mortgage payments for HDB flats or apartments.

Before the creation of HDB, housing in Singapore was mainly in dense but low-rise city centers and nearby squatter settlements. The remaining land is primarily rural, with Malay and Chinese villages. Due to limited land and overcrowded urban centers,

[21] Yuxin Cao, Chye Kiang Heng, and John Chye Fung, 'Towards Human-Centric Planning: Older People's Everyday Life in Neighbourhood Spaces in Singapore's Public Housing', *Habitat International*, 127 (2022), 102649 https://doi.org/10.1016/j.habitatint.2022.102649

[22] Denis Bocquet, 'Living in Singapore: Housing Policies between Nation Building Processes, Social Control and the Market', *TERRITORIO*, 74, 2015, 35–43 https://doi.org/10.3280/TR2015-074006

[23] Loh Kah Seng, 'Dangerous Migrants and the Informal Mobile City of Postwar Singapore', *Mobilities*, 5.2 (2010), 197–218 https://doi.org/10.1080/17450101003665028

[24] BENEDICT S. K. KOH and others, 'Investment Patterns in Singapore's Central Provident Fund System', *Journal of Pension Economics and Finance*, 7.1 (2008), 37–65 https://doi.org/10.1017/S1474747207003253

[25] S. Vasoo and James Lee, 'Singapore: Social Development, Housing and the Central Provident Fund', *International Journal of Social Welfare*, 10.4 (2001), 276–83 https://doi.org/10.1111/1468-2397.00186

the HDB turned to the construction of tall buildings and high density, and this development was gradually distributed across the island by creating a series of new satellite towns (or "estates") connected by transit systems fast. HDB is a pretty successful policy in dealing with illegal settlements in Singapore. The initial steps of the HDB program were the steps taken by the Singapore government to relocate its residents from slum settlements, vacate slum land, dismantle the buildings, and then change the function of the abandoned land into business centers, city parks, tourist attractions, and infrastructure. Road. In 2000, HDB, in providing a comprehensive housing environment for all deprived people, started the construction of more than 850,000 residential units, commercial premises, industrial premises, schools and community facilities, parks, and markets.[26]

To achieve this goal, the Singaporean government transformed a 500 km² island into a city park, constructing representative apartments or flats equipped with educational and health facilities, adhering to the principle that every family should have access to a clean and hygienic living space. The primary substance of this development is to combine the program for providing flats with public transportation, employment opportunities, educational facilities, health, and other basic needs, such as sufficient food. The land used for slum settlements is also provided to build various infrastructure and facilities, including infrastructure, city parks, and so on, to be converted into a world-class business center, economy, and tourist attraction.[27]

The presence of HDB is said to have succeeded in eliminating slum settlements and relocating their residents to small, clean, modern apartment blocks. HDB has played a role in helping keep Singapore housing prices and costs much more reasonable compared to housing prices in China's main cities, Hong Kong and Tokyo. HDB is even the backbone of accelerating urban space development. HDB-provided housing accounted for 80% of all residential units in 2016. According to the 2018 HDB Annual Report, 81% of Singaporeans live in HDB-provided public housing.[28] Vertical public housing development is combined with integrated planning of public facilities and utilities, road design, and public facilities such as schools, parks, and markets, implemented with strict standards and ratios. Singapore has become a destination and base for multinational companies. Singapore even provides massive subsidies for three essential services, namely housing, education, and health services, to make them affordable. Still, implementing housing programs in Singapore is not always pragmatically successful. In addition to the resources and supporting framework, this process requires continuous review and learning. Housing policies implemented without other social and economic policies have devastated several cities.

In the end, various laws related to land in Singapore have provided policies that support people's rights to obtain adequate housing. The government also considers the need for land to build public infrastructure. Going more profound than just creating an HDB program, Singapore's housing policy for squatters and low-income

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[26] Yang Zhang, Qingyong Zhang, and Huanhuan Zheng, 'Housing Policies in Greater China and Singapore', *Economic and Political Studies*, 8.1 (2020), 41–64 https://doi.org/10.1080/20954816.2019.1691797

[27] Sock Yong Phang and Matthias Carl Helble, 'Housing Policies in Singapore', *SSRN Electronic Journal*, 2016 https://doi.org/10.2139/ssrn.2753487

[28] Zhang, Zhang, and Zheng.

families is carried out using comprehensive public housing sector development as a means; Singapore has differentiated those who need a place to live, helping people experiencing poverty while filtering out those who can afford to buy private housing with prices that are generally several times higher. Interventions like this have maintained the housing sector's function, which has been realized in housing improvements that many parties internationally recognize. [29] However, some literature stated that Singapore's challenges in providing affordable housing are context-specific. It should be understood that not everyone in Singapore can access land ownership, especially foreigners. Development in Singapore may not yet show how the urban poor can be helped by providing housing. The government's commitment to assisting low-income households and the extent to which housing needs for people experiencing poverty can influence policy decisions will ultimately depend on the political environment in which those decisions are taken. Government intervention can greatly motivate, enable, and constrain housing-related action.

Eliminating housing problems and urban poverty requires a significant paradigm shift in thinking and acting toward poor communities. Cities and communities must see it as an asset, not a problem. Like the rest of society, they should be able to choose according to their needs. Through continuous learning and policy refinement, Singapore is gradually developing and building institutional capacity and a housing system that ensures program implementation. Institutions do not have to be the same. Singapore's housing development system, which has a single competent authority responsible for housing provision, may not be a model for all countries. Still, its pragmatic management principles are practical (such as inclusive housing and expanding homeownership opportunities for low-income families, targeted assistance for low-income renters, low household rates, and ongoing review of housing access) apply in most contexts.[30]

Government, Private Institutions, and Community Collaboration for Addressing Illegal Settlement in Australia

In substance, Australia has signed the Sustainable Development Goals of the United Nations, where the first point is "No Poverty" or" no poverty. More normatively, the Australian constitution states the rights of the people regarding the rights of Australian residents in Article 117, Rights of Residents in States, which reads: "A subject of the Queen, resident in any State, shall not be subject in any other State to any disability or discrimination which would not be equally applicable to him if he were a subject of the Queen resident in such another State." That is to say, every subject of a resident of the Queen, residing in any State, shall not be subject to any disability or discrimination in any other state which would not equally apply to him if he were a subject of a resident of the Queen in that other state. Yet, according to the International Monetary Fund 2019, Australia is ranked fourth out of 2d developed

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[29] Alice Christudason, 'Legal Framework for Collective Sale of Real Estate in Singapore', *Journal of Property Investment & Finance*, 28.2 (2010), 109–22 https://doi.org/10.1108/14635781011024854

[30] Cedric Pugh, 'The Theory and Practice of Housing Sector Development for Developing Countries, 1950-99', *Housing Studies*, 16.4 (2001), 399–423 https://doi.org/10.1080/02673030120066527

countries globally, with an ongoing gap between rich and poor.[31] This high level of poverty affects all factors in the lives of Australians, including the lack of adequate housing for lower-class people in Australia. The causes of poverty in Australia include: new initial social benefits payments for unemployed people are made constantly; rising housing costs; homeownership rates fall, and home rental prices rise.

Australia is experiencing a housing affordability crisis due to rising housing costs in Australia's major cities. This is a consequence of the financialization of housing and the implementation of neoliberal policies. [32] Financialization is the increasing dominance of financial actors, markets, practices, measurements, and narratives at various scales, resulting in the structural transformation of economies, companies (including financial institutions), states, and households.[33,34] ACOSS has developed a series of policy reform proposals to address poverty and inequality in Australia in the following areas: quality community services; action on climate change and affordable clean energy; economics and taxes; income and employment support; quality health services for all who need them; housing and homelessness. The Australian Council of Social Service (ACOSS) revealed that Australians are trapped in poverty due to low social benefits, lack of work, and high housing costs.

In Australia, there is the ACOSS institution, which, in this case, collaborates with the University of New South Wales to overcome the problem of poverty in Australia. This program uses two international poverty lines to measure poverty in Australia. The majority of calculations use "post housing costs." This is because housing is the most enormous fixed cost for most households. ACOSS and UNSW found that there were 3.24 million people (13.6%) living below the poverty line, amounting to 50% of the median income, including 774,000 children (17.7%) and 424,800 young people (13.9%) %). This poverty line works out to $457 or Rp in dollar figures. Four million seven hundred seventy thousand thirty-two per week for one adult living alone, or $960 or Rp. 10,025,226 per week for a couple with two children. It was also found that the majority (56%) of people below the poverty line rent a house to live in, while only 17% of people in poverty are homeowners who do not have a Home Ownership Credit. De facto, the main factor determining seniors' poverty status is their housing status; 41% of renters aged 65 and over are in poverty, compared to only 10% of all people aged 65 and over.[35]

As in many other countries, the shortage of affordable housing in Australia is one of the government's most pressing policy challenges. The increasing population growth in Australia has led to a moratorium on the construction of public housing for

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[31] Peter Saunders, Yuvisthi Naidoo, and Melissa Wong, 'Are Recent Trends in Poverty and Deprivation in Australia Consistent with Trickle-down Effects?', *The Economic and Labour Relations Review*, 33.3 (2022), 566–85 https://doi.org/10.1177/10353046221112715

[32] Kathleen Flanagan and others, 'A Conceptual Analysis of Social Housing as Infrastructure', *AHURI Final Report*, 309, 2019 https://doi.org/10.18408/ahuri-4114101

[33] Manuel B Aalbers and Anne Haila, 'A Conversation about Land Rent, Financialisation and Housing', *Urban Studies*, 55.8 (2018), 1821–35 https://doi.org/10.1177/0042098018759251

[34] Keith Jacobs, *Neoliberal Housing Policy* (New York, NY: Routledge, 2019.: Routledge, 2019) https://doi.org/10.4324/9780429425523

[35] Philip Mendes, 'The Australian Council of Social Service (ACOSS) and Indigenous Australians: An Historical Overview 1956–2011', *Journal of Australian Studies*, 35.3 (2011), 335–53 https://doi.org/10.1080/14443058.2011.591814

20 years; the gross deficit in the provision of social housing reached 140,000 residences in 2016. Australian citizens do not have constitutional protection regarding fundamental matters and social problems such as poverty and meeting the need for adequate housing. [36] Even though there are no constitutional regulations and protections for the right to adequate housing, the Australian government is paying attention to this social problem. ACOSS's research shows the role played by public policy, especially social security and taxation, but also housing and employment policy, among other areas, in determining levels of poverty and inequality in Australia.[37] Regarding structural matters, the Australian government has implemented the right to a decent home by creating several programs such as AAH. The program has been established with a coalition of more than 60 national housing, welfare, and community sector organizations emphasizing the issue of housing affordability. AAH advises all levels of government to make the necessary changes to ensure affordable housing is available for all Australians. As a result, governments at all levels influence the housing market through tax incentives, first-time homeowner grants, affordable housing programs, planning controls, and rental supports.

There is also Community Housing, a type of Social Housing (along with Public Housing and Affordable Housing). Community Housing is long-term rental accommodation provided by non-profit community organizations. Community Housing receives government assistance through grants, loans, housing, or current operational funding—community Housing offers long-term rental housing for low to moderate-income people with housing needs. Community Housing tenants have appeal rights just like Public Housing tenants. When a Community Housing tenant is affected by a decision made by a Community Housing organization, they can appeal to that organization. If eligible, some Community Housing organizations require renters to pay an amount equal to 100% of their Commonwealth Rent Assistance entitlement. Some Community Housing organizations also offer multiple group options, where tenants get a private bedroom with other facilities (such as bathrooms, kitchens, and laundry) that can be shared. Some Community Housing organizations also offer Affordable Housing where rent is 74.9% cheaper than market rent.

Another benefit of Community Housing is the provision of various housing options that reflect the needs and preferences of different residents. Community Housing providers also provide personal services that assist residents with issues related to each resident's tenancy. Most Community Housing tenants pay rents similar to public housing tenants (25% of household income) or market rent for specific properties, which is lower. Currently, five community housing organizations provide long-term housing reports to the Australian Capital Territory government, namely: 1) Argyle Community Housing, 2) Environmental Community Housing Organization, 3) Havelock Housing Association, 3) Salvos Housing, and 4) Tamil Senior Citizens Association. Australian citizens can also register for both Housing (Community Housing and Public Housing), with citizens registered for both on the Social Housing

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[36] Rodrigo Fernandez and Manuel B Aalbers, 'Financialization and Housing: Between Globalization and Varieties of Capitalism', *Competition & Change*, 20.2 (2016), 71–88 https://doi.org/10.1177/1024529415623916

[37] Judith Yates, 'Why Does Australia Have an Affordable Housing Problem and What Can Be Done About It?', *Australian Economic Review*, 49.3 (2016), 328–39 https://doi.org/10.1111/1467-8462.12174

Register managed by Housing Australian Capital Territory. Once registered, residents are entered into the Social Housing Register and allocated assisted housing based on need and suitability for available properties.[38]

Not only is AAH provided by the government and various types of Community Housing, in research by Hal Pawson et al. (2018), it is stated that to support existing programs, the government should also make policies expecting the existence of an affordable non-government housing industry, most of which configured on a non-profit community housing provider. However, for some government actors, the sector's developing status and, therefore, 'limited capacity' is seen as a significant limitation on the extent to which the industry can be delegated responsibility for reducing national housing pressures. It is hoped that private programs will fill the void in the role of the government and its existing institutions.[39]

In reality, Australia did not fully implement the housing policy Singapore claimed was successful. The opportunity to own a decent home in Australia remains difficult to fulfill. In their research, Alan Morris et al. (2019) stated that neoliberal housing policies and the financialization of housing in Australia have resulted in a housing affordability crisis. Historically, Australian housing policy has given local governments only a limited role. Almost all respondents from Sydney and Melbourne city councils understand that there is a housing affordability crisis in their local government areas. The housing crisis in Australia's largest cities necessitates a greater role for local government, a substantial increase in social and affordable housing construction, and canceling policies that encourage residential property speculation. In the last 60 years, Australia has become a country characterized by good-quality housing with a public safety net for everyone. Unfortunately, Australia's housing market is the most unaffordable in the world.[40] This has resulted in an increase in homelessness, housing insecurity, reduced outright ownership and a lack of supply of new housing. [41] Through mechanisms such as dividing houses and apartments into several smaller rentals or creating additional residences in backyards or garages, landlords ignore built environment and housing laws, including environmental planning regulations, building regulations, and rental laws. Often, these practices go unnoticed because concealment is a common characteristic of informal housing, making proactive enforcement of building controls or rental regulations difficult. [42] In turn, its unauthorized and hidden nature adds to the methodological challenges in documenting the scale and spread of informal housing.[43]

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[38] Chris Paris, 'Reflections on Community Housing in Australia', *Urban Policy and Research*, 15.1 (1997), 7–18 https://doi.org/10.1080/08111149708551635

[39] Hal Pawson, Vivienne Milligan, and Chris Martin, 'Building Australia's Affordable Housing Industry: Capacity Challenges and Capacity-Enhancing Strategies', *International Journal of Housing Policy*, 19.1 (2019), 46–68 https://doi.org/10.1080/19491247.2018.1469108

[40] Morris and others.

[41] Alan Morris, *Australian Dream* (CSIRO Publishing, 2016) https://doi.org/10.1071/9781486301461

[42] Christian G. Haid and Hanna Hilbrandt, 'Urban Informality and the State: Geographical Translations and Conceptual Alliances', *International Journal of Urban and Regional Research*, 43.3 (2019), 551–62 https://doi.org/10.1111/1468-2427.12700

[43] Jake Wegmann and Sarah Mawhorter, 'Measuring Informal Housing Production in California Cities', *Journal of the American Planning Association*, 83.2 (2017), 119–30 https://doi.org/10.1080/01944363.2017.1288162

These serious regulatory failures reflect the lack of a broader framework for enforcing standards in Australia's private rental sector.[44] Residential rental (lease) agreements require landlords to provide habitable accommodation that meets health and safety standards. However, the absence of a regulator aimed specifically at the private rental sector means that individual tenants must enforce these requirements.[45] Limited, adequate housing, which leads to informal or illegal housing, ultimately has complex effects. It is no longer just a matter of health and the living environment; it enters the realm of law regarding land rights. Therefore, research by Nicole Gurran et al. (2020) states the need for strategies to respond to informality, which tends to lead to formalization in the settlement of decent housing. Pressure needs to be put on the government over state efforts to formalize informal settlements. Because without formal and legal processes, residents in informal settlements do not have basic protection.[46] Apart from that, community culture contributes to policy enforcement, and the state institutional structure used to run the program is less effective, even though it involves the housing community and the private sector. The community's culture of looking for loopholes is one factor in the success of handling illegal settlements amid economic pressure in urban areas.

Administrative Law Enforcement for Governing Illegal Settlements

To survive, the choice of illegal development and migration to urban or suburban areas is difficult to avoid, thus leading to what is generally known as urban informality. UN-Habitat describes it as a residential area with one or more of the following characteristics:[47] 11) Insecurity of tenure about land use and residential structures. The occupants are settlers who live in warehouses or informal buildings rented or owned; 2) lack basic facilities, services, and city infrastructure; and 3) non-compliance with regulations and city planning building standards and are often located in geographically dangerous areas. This criterion covers the living environment, including the social, economic, and physical conditions of individuals or the whole population in a particular geographic area.[48] Housing policies that do not help people continue to worsen their basic rights. Humid heat stress is a threat underestimated by those living in informal urban settlements without effective adaptation strategies. Expanded climate monitoring is critical to accurately assess exposure to this vulnerable demographic and inform much-needed societal adaptation.[49] For example, in Nairobi's slums, there is strong evidence of a direct link

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[44] Edgar Liu and others, 'Poverty and Australian Housing: Findings from an Investigative Panel', *AHURI Final Report*, 410, 2023 https://doi.org/10.18408/ahuri7130501

[45] Nicole Gurran, Madeleine Pill, and Sophia Maalsen, 'Hidden Homes? Uncovering Sydney's Informal Housing Market', *Urban Studies*, 58.8 (2021), 1712–31 https://doi.org/10.1177/0042098020915822

[46] Gurran, Pill, and Maalsen.

[47] Zina Fouad and Sana Sati Abbas, 'The Role of Urban Land Management on the Informal Settlements', *IOP Conference Series: Earth and Environmental Science*, 754.1 (2021), 012014 https://doi.org/10.1088/1755-1315/754/1/012014

[48] Taibat Lawanson and Samson Fadare, 'Environment and Health Disparities in Urban Communities: Focus on Eti Osa, Nigeria', *City, Culture and Society*, 6.1 (2015), 43–52 https://doi.org/10.1016/j.ccs.2014.12.003

[49] Emma E. Ramsay and others, 'Humid Heat Stress Overlooked for One Billion People in Urban Informal Settlements', *One Earth*, 7.1 (2024), 2–5 https://doi.org/10.1016/j.oneear.2023.12.005

between the human environment and health.[50] In addition, according to Soyinka and Siu (2018), informal housing residents suffer significantly from social exclusion from urban benefits such as public housing schemes and social welfare systems, which prevents them from achieving health insurance.[51] Therefore, in addition to the policies various countries have pursued to provide affordable housing, it is also necessary to enforce squatter settlement.

A lack of knowledge in government administration makes handling illegal settlements challenging. This can create opportunities for corruption in land transactions where rights are not respected. Inappropriate regulations also exacerbate the increase in the number of slum areas.[52] P. Nicolai clarified that government organs can carry out administrative law enforcement in two ways: through supervision, where they can enforce compliance with written laws and oversee decisions that impose obligations on individuals, and through administrative sanctions. First, supervision is carried out by officials with the authority to grant permits. Supervision is a preventive measure to ensure compliance. Second, government organs implement administrative sanctions through legal sanctions, which officials can impose without resorting to a court process for violations of administrative law provisions. Sanctions are a repressive measure to force compliance. Applying these sanctions is at the core of administrative law enforcement and is considered very important in preventing illegal acts. Of course, these kinds of settlements do not have building permits, and some even occupy land without rights to unlawful settlements.

Administrative sanctions, such as warnings or verbal warnings, are the lightest forms of administrative law enforcement. This sanction is usually an initial stage before moving on to the next level or stage of administrative sanctions because administrative sanctions can be applied in stages. Legal certainty is necessary for this written warning or warning, ensuring that the recipient understands the exact actions required and the potential consequences of non-compliance. Furthermore, sanctions are in the form of government coercive action *(bestuurdwang)*, which is a concrete action by state administration officials to end a situation prohibited by statutory provisions or to do something someone should abandon because it is contrary to statutory regulations.[53] There are also physical violations of government coercive action, such as orders to stop construction work, sealing actions, or demolition of buildings without permission or with permission. Forced demolition often occurs in squatter settlement cases, typically commencing with a verbal or written warning.

An administrative fine is another type of administrative sanction. Tax law frequently contains administrative fines. The imposition of these sanctions almost

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[50] Joel Hartter and Sadie J. Ryan, 'Top-down or Bottom-Up?', *Land Use Policy*, 27.3 (2010), 815–26 https://doi.org/10.1016/j.landusepol.2009.11.001

[51] Oluwole Soyinka and Kin Wai Michael Siu, 'Urban Informality, Housing Insecurity, and Social Exclusion; Concept and Case Study Assessment for Sustainable Urban Development', *City, Culture and Society*, 15 (2018), 23–36 https://doi.org/10.1016/j.ccs.2018.03.005

[52] Fentaw Baye, Dagnachew Adugna, and Solomon Mulugeta, 'Administrative Failures Contributing to the Proliferation and Growth of Informal Settlements in Ethiopia: The Case of Woldia Township', *Heliyon*, 9.3 (2023), e13758 https://doi.org/10.1016/j.heliyon.2023.e13758

[53] Albertjan Tollenaar, 'Repressive Administrative Law', *European Journal of Social Security*, 20.1 (2018), 21–30 https://doi.org/10.1177/1388262718761392

resembles the imposition of criminal sanctions, and there must be a firm legal basis in statutory regulations. The government imposes administrative sanctions, known as forced money *(dwangsom)*. Forced monetary sanctions are also an alternative or replacement for government coercive measures *(bestuurdwang)*. If the government finds it practically difficult to implement its coercive measures *(bestuurdwang)* or deems them too severe, it will impose forced money. Forced money as a punishment or fine in the amount based on the terms of the agreement, which must be paid for non-fulfillment, incomplete implementation, or not within the specified time.[54] In current developments, there is a tendency in a limited number of cases with various considerations from state administration officials to end in imposing administrative fines. In the case of illegal settlements, law enforcement in various countries varies. However, this is generally done by giving warnings and forcing demolition to happen. For example, in cases of illegal rental properties in Australia, officers issue orders for the premises to cease unauthorized use, along with financial sanctions. Tenants living in such dwellings will be provided information on accessing alternative accommodation unless the premises are unsafe. Tenants will often be given time to move out. Ideally, the process to achieve retrospective remediation and occupancy approval would be initiated by the property owner. However, it is typically challenging to retrofit existing structures to meet habitable standards. Ironically, it is true that many tenants living in unauthorized and substandard housing do so through formal residential leases.

Elsewhere in Hong Kong, law enforcement is carried out with policies that result in forced evictions and their consequences. While the Squatter Control and Permitting Division of the Hong Kong Housing Department is responsible for evicting squatters and controlling illegal areas that are permitted to remain temporarily, officials must respond to the conflicts and challenges of their twin, partly contradictory mandates. The law enforcement process that dominates the eviction of groups occupying urban space illegally involves at least political, bureaucratic, and judicial factors. The political mode emphasizes confrontation mediated through power and the ability to build coalitions of support. Squatters can maintain control over space or even gain legal ownership through their capacity to cause problems or usefulness to particular political groups. Meanwhile, bureaucratic factors emphasize forming bodies to manage and control, although politics in the previous sense also continues to operate. Bureaucratic agencies may tolerate illegal occupation or provide compensation or resettlement when evicting residents. However, this is still an ex-gratia concession, not a right. The result is that few issues surrounding illegal settlements in Hong Kong involve courts or lawsuits, the main arenas of judicial modality.[55]

Based on several kinds of literature, Singapore handles illegal settlements ' humanity' rather than imposing administrative sanctions. However, in some cases, apparatus repression is also used to discipline unlawful settlers—likewise, the

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[54] Dezonda Pattipawae and Hendrik Salmon, 'Penerapan Uang Paksa (Dwangsom) Dalam Eksekusi Putusan Tatausaha Negara Terhadap Ketidakpatuhan Pejabat Tun', *Community Development Journal : Jurnal Pengabdian Masyarakat*, 3.3 (2022), 1634–36 https://doi.org/10.31004/cdj.v3i3.7495

[55] Alan Smart, 'Agents of Eviction: The Squatter Control and Clearance Division of Hong Kong's Housing Department', *Singapore Journal of Tropical Geography*, 23.3 (2002), 333–47 https://doi.org/10.1111/1467-9493.00134

imposition of administrative fines. Ideally, the government should enforce administrative law. Restrictions on development activities, temporary suspension or permanent suspension of development implementation, temporary control by the local government (seal), and orders to demolish house buildings. The presence of an ideal law aims to ensure that all communities living in illegal settlements are subject to the legal system. Of course, it must start with the community first so they can understand and be aware of the law, especially regarding illegal settlements. In Indonesia itself, many illegal settlements are found built on state-owned land. Apart from being dirty, the building stands on state land and does not have a permit. Controlling illegal settlements is carried out by giving warnings and followed by demolition to prevent the establishment of other illegal buildings that do not have permits. Regional governments handle problems like this. Unfortunately, each region has its policies, which are sometimes not in sync with central government regulations.[56]

In terms of implementation, administrative sanctions are more effective than criminal sanctions because administrative sanctions can be carried out directly by administrative officials without waiting for a court decision first, as long as the specified requirements are not complied with or violated. Meanwhile, criminal sanctions must await a court decision with permanent legal force. The process of imposing criminal sanctions will take quite a long time. However, imposing sanctions, which tend to be repressive, is not practical in reducing illegal settlements. Settlers with low incomes will still be unable to afford the high prices of land and housing in urban areas. To overcome these challenges, a comprehensive sustainable development strategy is needed. An affordable housing policy will positively impact more than simply carrying out evictions or imposing administrative fines. Policies can consider several things, viz.: affordable and equitable housing development, vertical compact housing development, public housing development accompanied by intensive provision, reform of land ownership policies and land bureaucracy, Owned housing rental system government and private sector, re-governing and integrating illegal settlement regulations at the central and regional levels, participatory approach and providing education with community/community leaders for relocation to break the community culture which tends not to hesitate to occupy land without rights.[57] Ultimately, policies that provide solutions 'where people will live' will work better than simply enforcing repressive administrative laws.

CONCLUSION

Urban populations are outpacing land and housing availability, leading to the persistence of illegal settlements, even in developed countries. Illegal settlers occupy state lands illegally, causing various issues of social inequality, health, environmental, and ecological damage, and limiting access to citizens' fundamental rights. Singapore has a massive housing policy through HDB, which has successfully dealt with illegal settlements in urban areas. This policy also takes into account the smaller territorial area of Singapore compared to other Asian countries, allowing the government to

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[56] Waleed S Alzamil, 'Evaluating Urban Status of Informal Settlements in Indonesia: A Comparative Analysis of Three Case Studies in North Jakarta', *Journal of Sustainable Development*, 11.4 (2018), 148 https://doi.org/10.5539/jsd.v11n4p148
[57] Soyinka and Siu.

focus on sustainable and effective development. However, in the event of an illegal settlement, the government will enforce administrative law through warnings and even demolition. Despite collaboration between governments through AAH, the private sector, and housing communities, Australia's housing policy, with land regulations in each state and territory, has not been entirely successful. It can be compared with Indonesia, where regional governments carry it out. Unfortunately, each region has its own policies, sometimes not in sync with central government regulations. In Australia, law enforcement takes the form of issuing orders to stop using unauthorized buildings and financial sanctions—affordable and fair housing policies. Administrative law enforcement, which is more effective in reducing illegal settlements than relying solely on enforcing administrative or criminal law alone, can accompany this. According to a culture of legal awareness, settlers who face various economic and social pressures are more difficult to discipline. The high prices of land and housing in urban areas remain unaffordable for settlers with low incomes. Therefore, the government must endeavor to adopt a community-participatory approach. Sustainable program implementation is also a factor that influences the success of housing policy.

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