



Published by the UFS

<http://journals.ufs.ac.za/index.php/trp>

© Creative Commons With Attribution (CC-BY)

How to cite: Mubangizi, J.C. 2024. The right to housing and the pan-African city: Challenges of inclusivity and equity – A review of four African countries. *Town and Regional Planning*, no. 84, pp. 72-82.

The right to housing and the pan-African city: Challenges of inclusivity and equity – A review of four African countries

John Mubangizi

Review article

DOI: <https://doi.org/10.38140/trp.v84i.7971>

Received: February 2024

Peer reviewed and revised: June 2024

Published: June 2024

**The author(s) declared no potential conflicts of interest with respect to the research, authorship, and/or publication of this article*

Abstract

The right to housing is a fundamental human right, but the paucity of context-specific legislation and policies on the right to housing makes housing inaccessible to a significant number of people residing in African cities. This review article explores the challenges of inclusivity and equity in the provision of housing within the framework of the pan-African city to provide legal frameworks for policymakers, urban planners, and stakeholders committed to realising the right to housing and the vision of the pan-African city. Specifically, it focuses on four diverse African nations – South Africa, Uganda, Tanzania, and Nigeria – for insights into the multifaceted nature of housing rights. The article begins with a review of the key concepts (housing, pan-African city, equity, inclusivity, policy planning), followed by a review of the challenges of inclusivity and equity in each of the selected countries within the context of the right to housing and the pan-African city. The article then reviews the selected countries' efforts to address the challenges within the framework of relevant international human rights instruments and the various countries' constitutional, legislative, and policy frameworks. It is concluded that the right to housing in the pan-African city remains an ambitious goal, with numerous challenges in achieving inclusivity and equity. It is recommended that African countries pay more attention to the right to housing within the pan-African city, emphasising the need for collaborative efforts to ensure access to safe, adequate, and affordable housing. This can be done through information and knowledge sharing, joint infrastructure development, cross-border collaborations, technology transfer, and regional financing mechanisms, among others.

Keywords: Right to housing, pan-African city, African countries, equity, inclusivity, urbanisation

DIE REG OP BEHUISING EN DIE PAN-AFRIKAANSE STAD: UITDAGINGS VAN INKLUSIWITEIT EN BILLIKHEID - 'N OORSIG VAN VIER AFRIKA-LANDE

Die reg op behuising is 'n fundamentele mensereg, maar die gebrek aan konteks-spesifieke wetgewing en beleid oor die reg op behuising maak behuising ontoeganklik vir 'n aansienlike aantal mense wat in Afrika-stede woon. Hierdie oorsigartikel ondersoek die uitdagings van inklusiwiteit en billikheid in die verskaffing van behuising binne die raamwerk van die pan-Afrikaanse stad om wetlike raamwerke te verskaf vir beleidmakers, stedelike beplanners en belanghebbendes wat daartoe verbind is om die reg op behuising en die visie van die pan-Afrikaanse stad te verweselik. Dit fokus spesifiek op vier uiteenlopende Afrika-lande – Suid-Afrika, Uganda, Tanzanië en Nigerië – vir insigte in die veelvlakkige aard van behuisingsregte.

Die artikel begin met 'n oorsig van die sleutelkonsepte (behuising, pan-Afrikaanse stad, billikheid, inklusiwiteit, beleidsbeplanning), gevolg deur 'n oorsig van die uitdagings van inklusiwiteit en billikheid in elk van die geselekteerde lande binne die konteks van die reg om behuising en die pan-Afrikaanse stad. Die artikel hersien dan die geselekteerde lande se pogings om die uitdagings binne die raamwerk van relevante internasionale menseregte-instrumente en die verskillende lande se grondwetlike, wetgewende en beleidsraamwerke aan te spreek. Die konklusie is dat die reg op behuising in die pan-Afrikaanse stad 'n ambisieuse doelwit bly, met talle uitdagings om inklusiwiteit en billikheid te bewerkstellig. Dit word aanbeveel dat Afrika-lande meer aandag gee aan die reg op behuising binne die pan-Afrikaanse stad, met die klem op die behoefte aan samewerkende pogings om toegang tot veilige, voldoende en bekostigbare behuising te verseker. Dit kan onder meer gedoen word deur inligting en kennisdeling, gesamentlike infrastruktuurontwikkeling, oorgrens-samewerkings, tegnologie-oordrag en streeksfinansieringsmeganismes.

Prof. John C Mubangizi, Free State Centre for Human Rights, Faculty of Law, University of the Free State, PO Box 339, Bloemfontein 9300, Republic of South Africa. Email: MubangiziJC@ufs.ac.za, ORCID: <https://orcid.org/0000-0002-1408-268X>

TOKELO EA BOLULO LE TOROPO TSA PAN-AFRIKA: LIQHOLOTSO TSA KENYELETSO LE TEKANO - TLHAHLOBO EA LINAHA TSE 'NE TSA AFRIKA

Tokelo ea bolulo ke tokelo ea mantlha ea botho, empa e ntse e sa fihlellehe ho palo e kholo ea batho ba lulang litoropong tsa Afrika. Sengoliloeng sena se hlaloha liqholotso tsa kenyeletso le tekatekano ea baahi phanong ea matlo ka har'a moralo oa Toropo ea Pan-Afrika. Sengoliloeng sena se shebane ka kotloho le linaha tse 'ne tse fapaneng tsa Afrika – eleng Afrika Boroa, Uganda, Tanzania le Nigeria - bakeng sa temohiso mabapi le mefuta e mengata ea litokelo tsa bolulo. Sengoliloeng se qala ka tlhahlobo ea mehopollo e ka sehlohong tlhahlobong ea liqholotso tsa kenyeletso le tekano naheng ka 'ngoe linaheng tse khethiloeng ka har'a maemo a tokelo ea bolulo le Toropo ea Pan-Afrika. Se boetse se hlaloha boiteko ba linaha tse khethiloeng ho rarolla mathata a ka har'a moralo oa Toropo ea Pan-Afrika, a ipapisitse le maano a machaba a litokelo tsa botho le meralo ea linaha tse fapaneng ea molao-theo, ketsa-molao le maano. Ho phethetsoe ka hore tokelo ea ho ba le matlo toropong ea Pan-African e ntse e le sepheo se seholo, se nang le liqholotso tse ngata ho fihlelleng kakaretso le tekano. Ho khotlaetsoa hore linaha tsa Afrika li ele hloko tokelo ea bolulo ka har'a Toropo ea Pan-Afrika, 'me li totobatse thokeho ea tšebeliso-'moho ho netefatsa phihlelo ea matlo a sireletsehileng, a lekaneng, 'me a theko e tlaase. Tse. Ling tsa lintho tse ka etsoang hofihlela sena ke ho arolelana tlhahisoleseding le tsebo, ntshetsopele e kopanetsweng ea meralo ea motheo, ts'ebeliso-mmoho ka nqa ho maliboho, phetisetso ea thekenoloji le mekhoe ea. Matlole a lichelete.

1. INTRODUCTION

The right to housing was first recognised by the Universal Declaration of Human Rights as part of the right to an adequate standard of living. Article 25 of the Declaration guarantees everyone “the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, and housing and medical care and necessary social services...”. Article 11(1) of the International Covenant on Economic, Social and Cultural Rights (ICESCR) also provides that “[t]he States Parties to the present Covenant recognize the right of

everyone to an adequate standard of living for himself and his family, including adequate food, clothing and housing, and to the continuous improvement of living conditions...”

Despite this international protection, the realisation of the right to housing remains a formidable challenge, particularly in the context of inclusive and equitable access to housing within the diverse and dynamic landscape of the African continent, characterised by rapid urbanisation, socio-economic disparities, and historical legacies of inequality.

The concept of the pan-African city envisions urban areas that are integrated, sustainable, and reflective of African identities and values. Unlike typical African cities, which may reflect colonial legacies or singular cultural influences, pan-African cities embrace plurality, promoting inclusivity, equity and recognising the interconnectedness of African people (African Union, 2015). Despite this vision, cities across Africa face several challenges of urbanisation and the right to housing in the pan-African city. First, the pan-African city is experiencing rapid population growth, due to rural-to-urban migration and natural population increase. It is estimated that, by 2050, 68% of the world's population will live in urban areas. According to the United Nations (2018: 1), roughly 90% of this projected urban population growth will come from Asia and Africa. Secondly, a significant portion of the urban population in African cities resides in informal settlements and slums characterised by overcrowding, poor sanitation, and lack of access to basic services (Kamana, Radione & Nyasulu, 2024). Thirdly, housing in the pan-African city is often unaffordable for a large portion of the population, particularly low-income earners. Other challenges include inadequate infrastructure, social exclusion and marginalisation, and inadequate or poorly enforced legal and policy frameworks related to land tenure, property rights, and urban planning. According to Cities Alliance (2012: online), “[t]hese inadequate legal frameworks are also reinforcing entrenched injustices

in relation to land and housing rights in urban areas. They are also frequently used to implement the eviction and destruction of informal settlements”. As a result of these challenges, the right remains inaccessible to a significant number of people residing in African cities (Cities Alliance, 2012).

Inclusivity and equity in housing provision in African cities entail ensuring that all individuals, regardless of socio-economic status, ethnicity, or background, have access to adequate, affordable, and secure housing (Cartwright *et al.*, 2018: 14). However, ensuring inclusive and equitable access to housing remains a significant challenge in many African cities, due to persistent issues related to housing affordability, accessibility, and quality, which disproportionately affect marginalised and low-income populations.

This review article explores the challenges of inclusivity and equity in the provision of housing within the framework of the pan-African city. Specifically, it focuses on four diverse African nations – South Africa, Uganda, Tanzania, and Nigeria – countries with distinct historical, economic, and political backgrounds, which provide valuable insights into the multifaceted nature of housing rights on the African continent. While each of these countries share common housing challenges such as informal settlements and inadequate housing supply, their unique historical, economic, and political contexts shape urban dynamics, policy frameworks, and socio-economic conditions that influence housing outcomes.

The motivation for the study is to identify common challenges and best practices, offering insights and recommendations for policymakers, urban planners, and stakeholders committed to realising the right to housing and the vision of the pan-African city. The ultimate goal is to contribute to the creation of more inclusive, equitable, and sustainable urban environments across Africa.

2. METHODS AND REVIEW APPROACH

The review provides background to the challenges of inclusivity and equity in the provision of housing within the framework of the pan-African city. The countries chosen for the review are South Africa, Uganda, Tanzania, and Nigeria. The choice of these countries is based not only on their distinct historical, economic, and political backgrounds, but also on their experiences and challenges relating to housing, particularly in the cities.

To achieve its objectives, the review uses, first, a doctrinal research methodology “that primarily involves the study of existing legal materials, such as statutes, case law, regulations, and legal commentaries. It focuses on analysing, interpreting, and synthesising these sources to answer legal questions or develop legal theories” (Sepaha, 2023). Doctrinal research is regarded as a conventional research approach that occurs in a law library to locate authoritative decisions, applicable legislation, and any other secondary sources of information (Singhal & Malik, 2014: 252). The other advantage of a doctrinal research methodology is that it lends itself to a comparative review. In this instance, it is most suitable and appropriate for comparing the legal approaches of different jurisdictions on a specific legal issue such as the right to adequate housing and the related inclusivity and equity challenges reviewed in this article.

Related to the doctrinal methodology, the review mainly employed desktop and library-based research. This involves obtaining information mainly from secondary sources. The secondary sources consulted comprised Google Scholar, Taylor and Francis, Wiley Online Library, Science Direct, and ResearchGate. Keywords used for the search included right to housing, African cities, urbanisation, equity, inclusivity, policy planning, legislative framework, informal settlements, land tenure, and land reform.

The main phase of desktop research occurred between 16 January 2024 and 5 February 2024, with additional information gathered from 15 March 2024 to 31 March 2024. Both recent and older literature were used to capture current perspectives on challenges of inclusivity and equity in the provision of housing within the framework of the pan-African city as well as insights into the multifaceted nature of housing rights. Recent literature, defined as publications within the past 10 years (since 2014), and older literature preceding 2014 were examined. Sources included international human rights instruments, national laws, and case law. Other secondary resources included books, journal articles, and online scholarly publications. Although the review focused on four African countries, sources from around the globe were consulted, as issues such as access to housing, urbanisation, inclusivity, and equity have universal relevance and application.

This article begins with a review of the key concepts such as housing, the pan-African city, inclusivity, and equity. The challenges of inclusivity and equity in each of the selected countries are then discussed within the context of the right to housing and the pan-African city. The article then reviews the selected countries’ efforts to address the challenges within the framework of relevant international human rights instruments and the various countries’ constitutional, legislative, and policy frameworks. It is concluded and recommended that African countries should pay more attention to the right to housing within the pan-African city, by introducing more context-specific legislation and policies, among others.

3. KEY CONCEPTS

In order to have a clear understanding of the challenges of inclusivity and equity in the provision of housing within the framework of the pan-African city, it is important to first have a contextual understanding of the relevant concepts.

3.1 Housing

Although the concept ‘housing’ is generally easily understood, it is difficult to define, as many different definitions are usually ascribed to it depending on the context within which it is being defined. However, Henilane (2016: 173) offers a suitable definition in the context of the present review: “...housing is a building or part of a building where a household can live...and which meets certain statutory requirements, including also residential address”.

In that sense, housing is viewed as shelter, which is the simplest and the most traditional definition of the concept. It is in that regard that the African Commission on Human and Peoples’ Rights (ACHPR) (2011: 40) defines the right to adequate housing as

“the right of every person to gain and sustain a safe and secure home and community in which to live in peace and dignity, [which] includes access to natural and common resources, safe drinking water, energy for cooking, heating, cooling and lighting, sanitation and washing facilities, means of food storage, refuse disposal, site drainage and emergency services”.

3.2 Pan African city

The concept of a ‘pan-African city’ is more difficult to define. However, it must be viewed within the context of pan-Africanism, a movement that seeks to promote unity, solidarity, and collaboration among people of African descent (Kuryla, 2024). It also seeks to overcome historical divisions, promote self-reliance, and build a united and prosperous Africa (Falola & Agbo, 2019). The concept ‘pan-African city’ typically refers to a city that embodies the principles of pan-Africanism and aligns with its broader goals. The term implies a city that reflects and celebrates the diverse cultures, histories, and contributions of African people. Accordingly, a pan-African city might serve as a hub for political, economic, and cultural activities that foster connections and collaboration among African nations and communities (Simone, 2010). Pan-African cities

prioritise equitable development, sustainable practices, and cultural preservation, reflecting a shared vision for a prosperous, harmonious future (African Union, 2015: 12).

3.3 Equity

In the context of the present review, the concepts of 'equity' and 'inclusivity' are important. Equity may be defined as "fair treatment, access, opportunity, and advancement for all people, while at the same time striving to identify and eliminate barriers that have prevented the full participation of some groups" (Minow, 2021: 175). In that sense, the concept is associated with social justice, and it involves the fair and just treatment of all individuals, taking into consideration factors such as race, gender, socio-economic status, and other dimensions of diversity (Cartwright *et al.*, 2018: 14). Western Carolina University (WCU) (n.d.) defines the concept of 'equity' as "fair treatment, access, opportunity, and advancement for all people through identification and elimination of social, institutional, and/or individual barriers that disadvantage some groups while advantaging others". Both the above definitions are consistent with the understanding of housing provision in African cities which entails ensuring fair and just distribution of housing resources, prioritising the needs of marginalised communities, and promoting inclusive urban development (African Union, 2015: 62).

3.4 Inclusivity

As with equity, the concept of 'inclusivity' also emphasises the idea of fair and just treatment. As such, it aims to provide equal access and opportunities to all individuals, regardless of their differences in characteristics such as race, ethnicity, gender, age, sexual orientation, socio-economic status, abilities, or any other distinguishing factor. Inclusivity can, therefore, be defined as "the fact of including all types of people, things or ideas and treating them all fairly and equally" (*Cambridge Dictionary*, n.d.).

According to Newman and Jennings (2008: 2018), an inclusive city is one that promotes growth with equity. "It is a place where everyone, regardless of their economic means, gender, race, ethnicity or religion, is enabled and empowered to fully participate in the social, economic and political opportunities that cities have to offer." The goal of inclusivity is, therefore, to create an environment that respects and values diversity, fostering a sense of belonging and ensuring that everyone feels included and represented. Inclusivity in housing provision in African cities means creating housing opportunities that embrace diversity, cater to the needs of all residents, and promote social cohesion and equitable access (African Union, 2015: 32).

3.5 Policy planning

Policy planning refers to the process of formulating, analysing, and implementing strategies or courses of action to address specific issues, challenges, or goals within a governmental, organisational, or institutional context (UNDP, 2019: 6). It "represents one of the key integral elements of effective functioning of public administration [and] enables government to provide a broad range of public services to its citizens, carry out ambitious reforms and be more effective in achieving set goals and objectives" (UNDP, 2019: 5). It involves assessing current conditions, identifying objectives, considering various options and their potential impacts, and ultimately selecting and implementing the most suitable policies to achieve desired outcomes (UNDP, 2019: 16). Policy planning is important in realising the right to housing, as it addresses housing shortages, ensures affordability, and promotes social inclusion (OECD, 2021). It also enhances environmental sustainability and mitigates urban sprawl and other challenges (James, 2023: 55).

Based on the foregoing understanding of the key concepts, a review of the selected countries' efforts to achieve the right to housing in the face of equity and inclusivity

challenges and in the context of the pan-African city is important to suggest legal frameworks for policymakers, urban planners, and stakeholders committed to realising the right to housing and the vision of the pan-African city.

4. CHALLENGES OF INCLUSIVITY AND EQUITY AND THE RIGHT TO HOUSING IN SELECTED COUNTRIES

4.1 South Africa

South Africa has a severe housing crisis. Although this crisis can be attributed to several factors, rapid urbanisation is the most critical factor. It is estimated that, in 2022, "more than 65% of the country's population resided in urban areas" (Moeti, 2023). According to Moeti (2023), in 2022, there was a shortfall of 3.7 million housing units in the country's urban centres where "low-income households – which constitute the majority of the populace – struggle to find decent, safe shelter". Rapid urbanisation is, therefore, "one of the factors that have resulted in the unprecedented increase in the populace of South Africa's urban areas and is one of the contributors to housing delivery challenges in the country" (Marutlulle, 2021).

The challenges of inclusivity and equity relating to the right to housing in South Africa have to be viewed against the background of the country's unique history, which was characterised by gross violations of human rights, institutionalized racism, denial of access to social and economic resources, and inequality (Mubangizi, 2008: 131). Prior to 1994, inequality was a defining feature of the South African society and was given expression through a variety of forms. As a result of this very same history, South Africa currently faces an acute housing shortage. As the Constitutional Court acknowledged in *Government of the Republic of South Africa v Grootboom* 2001 (1) SA 46: para 6, "[t]he cause of the acute housing shortage lies (at least partly) in apartheid...and its

system of influx control that sought to limit African occupation of urban areas". Thirty years after the dawn of democracy, inequality remains one of the biggest challenges in the country, generally, and in urban housing, specifically. With a Gini coefficient of around 0.67, South Africa has the highest income inequality in the world (and hence the highest degree of inequality) (Valodia, 2023). This inequality translates into unequal access to housing opportunities. The gap between the affluent and the marginalised perpetuates spatial divisions, accentuating housing disparities especially in urban areas.

Related to rapid urbanisation and inequality are challenges of poverty and unemployment. The exponential growth of urbanisation in South Africa is inevitably accompanied by "unprecedented proliferation of slums and informal settlements and a chronic lack of adequate housing... [which are] ... the visible manifestations of poverty and inequality in cities" (Marutlulle, 2021: online). These areas not only lack basic infrastructure and services, such as proper sanitation, electricity, and healthcare, but also perpetuate a number of social ills such as crime and overcrowding. Lack of adequate infrastructure in informal settlements is another challenge that makes it difficult for residents to access basic services. Moreover, slums and informal settlements are often situated in vulnerable areas making them disproportionately susceptible to the impacts of climate change such as flooding.

Although South Africa's post-apartheid era has witnessed the introduction of several policies, including, among others, the White Paper on Housing (2004), the Inclusionary Housing Policy (2007), and the National Housing Code (2009), aimed at rectifying historical injustices, some have argued, however, that some of these policies are a challenge themselves. It is argued that policies such as the Reconstruction and Development Programme (RDP), Growth, Employment, and

Redistribution (GEAR), and the National Development Plan (NDP) were aimed primarily at creating an environment conducive to growth, resulting in a decrease in funds intended for social needs, including housing (Jeffrey, 2010). Aggravated by corruption, maladministration and poor governance, these challenges have had significant implications for the right to housing in South Africa, particularly in urban areas and in the context of inclusivity and equity.

4.2 Uganda

Uganda's housing landscape is characterised by rapid urbanisation, driven by population growth and rural-urban migration. According to one commentator, "Uganda's urban centres face a grave and often ignored crisis: a scarcity of affordable housing, coupled with subpar living conditions and unequal access to shelter" (Mwalimu, 2023: online). One of the main challenges, therefore, revolves around equity and social justice. This is because the housing crisis disproportionately affects marginalised groups such as low-income earners, women, the elderly, refugees, people with disabilities, and other vulnerable populations, thereby exacerbating social inequalities (Mwalimu, 2023). Related to this is the issue of affordability. Affordable housing is a significant challenge in Ugandan urban areas, particularly for low-income households. High construction costs, limited access to credit, and increasing urbanisation contribute to the difficulty of obtaining affordable housing options. This is obviously compounded by unemployment and high poverty levels.

As with many African urban areas, informal settlements or slums are prevalent in Ugandan cities. Over 60% of urban residents in Uganda live in slums that are typically characterised by poor sanitation, high disease incidence, and frequent epidemics (UN-Habitat, 2016). They often lack basic infrastructure and services such as clean water, sanitation, and adequate housing. Residents in

these informal settlements face challenges in accessing secure and affordable housing options.

Poor and inadequate urban planning is another major challenge. Rapid urbanisation in Uganda has sometimes outpaced effective urban planning. According to the United Nations Human Settlements Programme, "some urban councils lack plans to guide plan supplements for provision of associated infrastructure... Consequently, developments are taking place in these centres with little or no enforcement of regulations, leading to uncontrolled expansion of informal settlements" (UN-Habitat, 2016). This is one of the factors responsible for the development of informal settlements, insufficient infrastructure, and challenges in providing equitable access to housing and services. This is aggravated by an inadequate policy-planning framework.

Uganda's housing policies have historically been fragmented and lacked a comprehensive approach to addressing housing challenges. There has not been a clear, overarching policy framework that addresses the diverse needs of the population. As a result, the housing policy framework revolves around the 2016 National Housing Policy whose purpose is stated as follows:

"...to increase the production of adequate housing for all income groups from 60,000 to 200,000 housing units per annum so as to meet the housing needs by 2022; to improve the quality of the existing housing stock; to promote an efficient utilization of energy and other resources in housing; to increase access to affordable housing; to improve security of tenure for property owners; and to improve the mechanisms for development and management of the Real Estate Industry" (Uganda Ministry of Lands, Housing and Urban Development, 2016).

Although the policy sets out several strategies whereby to achieve its objectives, such strategies have been found not to be "practical and achievable for the housing access to be more guaranteed to the majority of the population, which belongs to

the vulnerable segment” (Mubiru *et al.*, 2022: 283). Other policies include the National Vision 2040, the National Development Plan (NDP) II, the National Land Use Policy (2007), the National Land Policy (2013), the National Housing Policy (2016), and the National Slum Upgrading Strategy (NSUS) (2008).

There are a number of challenges related to land-management and land-tenure systems in Uganda that have implications for inclusivity and equity. The challenges identified by the United Nations Human Settlements Programme in this regard include, “increasing landlessness and land poverty as seen in the increasing number of people encroaching on protected land or living in high-risk areas; abuse, underutilisation and scrambling over communal public lands (UN-Habitat, 2016). They also include discrimination of women and youth in accessing land; under-utilisation of land owned by cultural and religious institutions; inadequate land-administration services especially land dispute resolution, valuation and land-use planning; poorly functioning land sales and rental markets, as well as poor urban planning and proliferation of informal settlements and slums (UN-Habitat, 2016). These challenges are clearly quite complex, and usually lead to difficulties in obtaining legal ownership of land. They also lead to a lack of inclusivity and equity in land ownership, particularly in urban areas.

4.3 Tanzania

Like many African countries, Tanzania is experiencing rapid urbanisation and the challenges associated therewith. Limited availability of land for housing is one of those challenges. This has led to the growth of informal settlements and slums, which often lack proper infrastructure, basic services, and tenure security, contributing to housing inequality. According to Ndezi (2022: 97):

“Many urban poor people [in Tanzania] reside in informal settlements, where infrastructure is also poor, leading to inadequate

housing. In most of the informal settlements, there is a lack of services – including water and sanitation, solid waste management, and transportation”.

It is estimated that 70% of landowners in Tanzanian urban areas occupy the land on informal arrangements – formal tenure, therefore, is held by only 23% of landowners (Komu, 2022: 74-75). The challenge arising from this is insecurity of land tenure and lack of property rights. Many people, especially those in informal settlements, lack secure land tenure. In some instances, traditional land-tenure systems may not align with modern legal frameworks, causing complications in property ownership and development. Insecure land rights can lead to forced evictions and limit residents’ ability to invest in and improve their homes. This is compounded by the fact that, in Tanzania, housing rights are influenced by the country’s socialist legacy and the Ujamaa philosophy.¹ Although the Tanzanian government abandoned the ideology of Ujamaa and its practices several decades ago, the Constitution of the United Republic of Tanzania, still provides that the country is a democratic and socialist state, in practice (Article 3 (1)). Hence, although nowadays Tanzania is not a socialist country but a capitalist, liberal state that adheres to multiparty democracy, the socialist legacy still remains and has an influence on land rights and land ownership.

One particular challenge of inclusivity and equity relates to affordability. The cost of formal housing can be prohibitively high for many Tanzanians. Income disparities among different socio-economic groups exacerbate the affordability issue, making it difficult for low-income populations to access decent housing. According to Limbumba (2022: 73), “[a]ccess to adequate

and affordable housing in urban areas of Tanzania is constrained by poverty, and low incomes”. Limited access to affordable financing options and high construction costs contribute to this challenge.

Other challenges that have implications for inclusivity and equity in the context of the right to housing in Tanzania’s cities include lack of adequate and inclusive urban planning, and insufficient and inadequate infrastructure. According to Mathias (2023: online),

“[t]he lack of comprehensive urban planning and inadequate infrastructure lead to slums characterized by informal settlements and poor living conditions... These slums lack access to essential services, such as clean water, sanitation facilities, and proper housing, which ultimately impact the health and well-being of the residents”.

People from low-income populations and marginalised groups generally reside in these slums. Their rights to proper housing are affected and they are the victims of lack of equity and inclusivity.

In so far as the policy planning framework is concerned, the main policy governing housing in Tanzania is the 1981 National Human Settlements Development Policy whose theme has been to provide adequate housing to the citizens. The main objectives of the policy were to build more new low-cost houses and rehabilitate existing ones; to place particular emphasis on housing programmes for low-income groups; to mobilise and facilitate the easy acquisition of building land and finance; to encourage and assist individual efforts aimed at building or buying houses, and to encourage the production of local building materials. Although the policy is more relevant to the poor and vulnerable than other policies prior to 1981, some of its provisions were “simple rhetoric and generally appeared simply a paraphrase of the previous documents” (Mubiru *et al.*, 2020: 280).

¹ A social and economic policy developed and implemented in Tanzania by President Julius Nyerere between 1964 and 1985, based on the idea of collective farming and the ‘villagisation’ of the countryside, and an increased level of self-reliance at both an individual and national level.

4.4 Nigeria

With over 213 million people, Nigeria is clearly one of the most populous countries in the world. A 2022 World Bank report estimated that 53% of Nigeria's total population live in urban areas, and that that figure is expected to grow to 70% by 2050 (World Bank, 2022). With these kinds of trends, the main challenge militating against the right to housing in Nigeria's cities is that of spontaneous and uncontrolled urbanisation. A related challenge is that infrastructure development and service delivery are not keeping pace with urban population growth in Nigeria (Adedini, 2023). As a result, rapid urbanisation has led to the growth of informal settlements, characterised by inadequate housing, lack of basic services, and poor infrastructure. These settlements often house marginalised populations who face challenges in accessing formal housing markets.

Besides infrastructure deficiencies and lack of basic services, Nigeria's diverse and rapidly expanding urban centres lend themselves to other challenges in terms of housing access, due to inadequate urban planning and a growing housing deficit. Indeed, poor urban planning in the face of rapid urbanisation is regarded as one of the major problems confronting many urban areas in Nigeria (Izueke & Okechukwu, 2013: 42). Moreover, it should be noted that poor urban planning that does not consider the needs of diverse populations may result in exclusionary practices. As for the growing housing deficit, it is estimated that Nigeria has a housing deficit of 28 million housing units – indicating that the country needs at least 28 million housing units to provide adequately for its population (Uduu, 2023).

The Nigerian housing policy framework takes the growing housing deficit into account. The main and most relevant policy is the Nigeria National Housing Policy of 2011, which “was drafted principally to help remedy the previous policies and legislation's shortfalls” (Mubiru *et al.*, 2020: 282). The policy also “takes into consideration, other vital issues

like health, finance, cooperative, provision of infrastructure, building materials (with emphasis on local building materials), periodic maintenance and repair, as well as the reform of the policy” (Ibimulua & Ibitoye, 2015: 56). The policy has also been commended for addressing “vital issues in housing provision like prototype designs, urban housing, rural housing, access to land, affordable housing cost, the use of local materials (with consideration for climate and culture), as well as the preference of the users” (Ibimulua & Ibitoye, 2015: 56). A major criticism of the policy relates to monitoring, evaluation, and review. It has been suggested that “adequate mechanisms are not put in place for the appraisal of the policy and housing sector as a whole” (Ibimulua & Ibitoye, 2015: 56). Moreover, some have argued that there is nothing to show for the impact of the policy as “the efforts have not shown remarkable improvement in the status quo since many Nigerians are still homeless while up till this time, many are living in dingy and ramshackle structures” (Ibimulua & Ibitoye, 2015: 56).

As in many other African cities, affordability (or lack thereof) is another challenge of equity and inclusivity in relation to the right to housing. Many Nigerian urban residents, especially those with lower incomes, struggle to afford decent housing. As mentioned earlier, rapid urbanisation and population growth have exacerbated the demand for housing, leading to increased property prices and rentals. Limited land availability, insecure land tenure, and the high cost of construction materials and financing are some of the factors that hinder the development of affordable housing projects. Limited affordable housing options contribute to housing inequality, as low-income individuals and families are forced to live in informal settlements or inadequate housing conditions.

In the specific context of the right of access to housing, Adedeji (2023: 356) captures the challenge of

inclusivity and equity in Nigerian urban areas as follows:

“Urbanization has intensified social inequalities, with marginalized populations often facing limited access to housing, education, healthcare, and employment opportunities. The urban poor, including informal settlers and low-income earners, are particularly vulnerable to exclusion and face difficulties in accessing affordable housing options and basic services”.

The foregoing review highlights the challenges of inclusivity and equity in the selected countries within the context of the right to housing and the pan-African city. What follows is a review of the selected countries' efforts to achieve the right to housing in light of those challenges.

5. DISCUSSION: ADDRESSING THE CHALLENGES

Governments of the countries discussed above have taken significant measures to address inclusivity and equity challenges in the realisation of the right to adequate housing, particularly in urban areas. In so doing, international and domestic legal frameworks play an important role. As mentioned earlier, the right to adequate housing is recognised in Article 25 of the 1948 Universal Declaration of Human Rights (UDHR) as part of the right to an adequate standard of living, and in Article 11(1) of the 1966 International Covenant on Economic, Social and Cultural Rights (ICESCR). Other international human rights instruments have since recognised or referred to the right to adequate housing or some elements thereof (OHCHR, n.d.). All the countries discussed above are parties to the UDHR and the ICESCR. One of the entitlements contained in the right is equal and non-discriminatory access to adequate housing. The other is participation in housing-related decision-making at both national and community levels (OHCHR, n.d.). These are both elements of inclusivity and equity.

On the domestic front, it is important to note that, among all the countries discussed, only South Africa directly provides for the right of access to housing in its Constitution. It is contained in the Bill of Rights under section 26 and is fully justiciable and enforceable, as has been demonstrated by the Constitutional Court in cases such as *Government of the Republic of South Africa and Others v Grootboom* 2001 (1) SA 46 (CC). The other countries – Uganda, Tanzania and Nigeria – include the right under the Fundamental Objectives and Directive Principles of State Policy, making it non-justiciable and unenforceable by the courts. According to the Preamble of the Constitution of Uganda, Fundamental Objectives and Directive Principles of State Policy are intended to “guide all organs and agencies of the State, all citizens, organisations and other bodies and persons in applying the Constitution and any other law and policy decisions...”. Hence, they cannot be enforced in a court. This is a big challenge in that the constitutions of those countries cannot be used directly to enforce the right to adequate housing and the inclusivity and equity challenges related thereto. Accordingly, the constitution plays a more significant role in addressing housing challenges in South Africa than in the other countries under discussion.

In the particular context of the pan-African city, policy and legislative initiatives are crucial in addressing inclusivity and equity challenges in realising the right to adequate housing. In South Africa, relevant legislation includes the Housing Act (107 of 1997), which provides a legal framework for housing development and regulation, the Social Housing Act (16 of 2008), which establishes the regulatory framework for social housing institutions, and the Spatial Planning and Land Use Management Act (16 of 2013), which aims to promote spatial justice, efficient land use, and inclusive urban development. It also includes the Extension of Security of Tenure Act (62 of 1997), the Rental Housing Act (50 of 1999), and the Prevention of Illegal Eviction from and Unlawful

Occupation of Land Act (19 of 1998). These statutes “form a web of protection that has considerably improved the position of the poor whose legal rights of access to land and housing have traditionally been weak or non-existent” (Mubangizi, 2008: 130). Relevant policies include the National Development Plan (NDP), Chapter 8 of which specifically focuses on improving spatial integration, access to housing, and addressing inequality in cities. They also include the 2003 Social Housing Policy and a national housing policy entitled *Breaking New Ground: A Comprehensive Plan for the Development of Sustainable Human Settlements* (2004).

The legislative framework regulating the housing sector in Uganda includes, among others, the Land Act (1998), the Mortgage Act (2010), the Registration of Titles Act (1964), the Land Acquisition Act (1965), the Physical Planning Act (2010), and the Rent Restriction Act (2000). Relevant policies, as mentioned earlier, include the National Vision 2040, the National Development Plan (NDP) II, the National Land Use Policy (2007) and the National Land Policy (2013). They also include, among others, the National Housing Policy (2016) and the National Slum Upgrading Strategy (NSUS) (2008). The Ministry of Lands, Housing and Urban Development has admitted, however, that the “policy and legal framework for the housing sector is inadequate and scattered under different instruments, which makes it hard for the sector to effectively implement them” (Uganda Ministry of Lands, Housing and Urban Development, 2016). This, it is submitted, significantly impacts on the ability to address inclusivity and equity challenges in realising the right to adequate housing in Uganda, particularly in urban areas.

Although there are several Tanzanian statutes that deal with land issues, in general, and housing, in particular, the most relevant pieces of legislation are the Land Act (Cap 113), the Urban Planning Act (8 of 2007) and the Local Government (Urban Authorities) (Development Control

Regulations (Government Notice Number 242 of 2008). Section 3(a) of the Urban Planning Act provides that one of the fundamental principles of urban planning in Tanzania is to “make serviced land available... to all sections of the community including women, youth, the elderly, disabled, and disadvantaged.” Section 3(i) of the same Act provides that “...all persons and authorities exercising powers, applying or interpreting the provisions of this Act shall be under the duty to ensure that planning legislation, building regulations, standards and other controls are consistent with the capabilities, needs and aspirations of the various sections of the population”. These provisions are clearly aimed at addressing inclusivity and equity challenges in the realisation of the right to housing.

Insofar as the policy framework is concerned, the two most relevant policies are the National Land Policy (1995) and the National Human Settlements Development Policy (2000). The latter was intended to facilitate the provision of adequate and affordable shelter to all income groups in Tanzania and the former was, among other things, intended to address specific objectives such as to promote equitable distribution of, and access to land by all citizens (section 2(1)). These are particularly important in the context of inclusivity and equity as well as the right of access to housing, particularly in urban areas.

In Nigeria, the Land Use Act (6 of 1978) is a key legislation that governs the ownership and use of land, and it has implications for housing development and land allocation in urban areas. So too does the Urban and Regional Planning Act (2004), which focuses on planning and development control in urban and regional areas. Among other things, it contains provisions related to housing planning and access in urban environments. For example, it provides for the establishment of appeal tribunals at state and national levels “to address matters of complaints and appeals arising from the decisions and actions of

any of the institutions within the planning administration framework”.

...[these] tribunals are to operate in a parallel fashion, responding to appeals from developers and the general public, reviewing cases, and issuing compensation where they are adjudged appropriate. The tribunal is, therefore, a judicial recourse to address conflicts that may arise as a result of actions taken by PAs or DCDs, including grievances arising from revocation of titles to land, evictions, demolition of property, refusal or delay in planning permit approval, and similar cases from both the PA and the DCD” (Sani, 2022: 81).

It is submitted that, in performing these functions, the tribunals play an important role in addressing inclusivity and equity challenges related to the right of access to housing in Nigeria’s urban centres.

Insofar as the policy framework is concerned, the Nigerian National Housing Policy (NHP) is most relevant, as was mentioned earlier. It aims to provide a comprehensive framework for addressing housing challenges in Nigeria. It emphasises the need for affordable and accessible housing for all citizens. The policy promotes public-private partnerships and encourages the involvement of the private sector in housing development. Also relevant is the National Urban Development Policy (NUDP) which focuses on the overall development of urban areas, including housing. It seeks to create sustainable, inclusive, and well-planned urban environments. The policy emphasizes the provision of basic amenities, infrastructure, and housing for all residents.

Addressing inclusivity and equity challenges related to the right to housing in the pan-African city cannot be done only through legislative and policy initiatives. Advocacy, social mobilisation, education, citizen participation and meaningful community engagement also play an important role. The role of civil society is, therefore, also important. This applies to all the countries discussed in this study. An example in South Africa is the role played by two active social movement organisations (the Federation of the Urban Poor and

Abahlali baseMjondolo) in addressing the housing needs of the poor in the city of Durban (Mitlin & Mogaladi, 2013). In Tanzania, an example is the mobilisation undertaken by the Tanzania Federation of the Urban Poor (TFUP) – a national slum-dweller movement – against evictions in Dar es Salaam’s Kurasini area (Hooper & Ortolano, 2012).

Finally, equity and inclusivity challenges in the right to housing can be addressed through the courts – by judicial means. However, this is much more possible in South Africa whose Constitution includes a right of access to housing than in the other countries in which the right is not justiciable as was noted earlier. Indeed, the South African Constitutional Court has pronounced itself on cases involving the right to adequate housing, such as *The Government of South Africa & Others v Grootboom & Others* 2001 (1) SA 46 and *President of the Republic of South Africa and Another v Modderklip Boerdery (Pty) Ltd* 2005 (5) SA 3 (CC). In *Grootboom*, the Court held that the state had failed to meet the obligations placed on it by section 26 of the Constitution (providing for the right of access to adequate housing). In the *Modderklip Boerdery* case which dealt with a private landowner and his right to property versus the right of the community to adequate housing, the Court found in favour of the residents on the basis that the state had failed to provide alternative accommodation to them and an eviction would amount to a violation of their right to housing.

6. CONCLUSION

As South Africa, Uganda, Tanzania, and Nigeria navigate the complex terrain of the pan-African city, the challenges of ensuring inclusivity and equity in housing persist. Historical legacies, socio-economic dynamics, inadequate policy frameworks, and the impact of rapid urbanisation contribute to the multifaceted nature of these challenges. Other contributing factors include inequality, poverty, unemployment, as well as poor and inadequate urban planning.

They also include proliferation of slums and informal settlements, infrastructure deficiencies, and lack of basic services.

This review has shown that, although governments of the countries discussed above have taken significant measures to address the challenges mainly through constitutional, legislative, and policy initiatives, disparities in housing access persist, particularly in urban areas. Issues related to land tenure, land reform, informal settlements, urbanisation, corruption, and informal housing settlements remain critical and need to be confronted. Despite all the efforts, therefore, the right to housing in the pan-African city remains an ambitious goal.

It is recommended that African countries pay more attention to the right to housing within the pan-African city. One way of doing this is by introducing more context-specific legislation and policies such as land-use regulations, affordable housing policies, housing finance reform, land tenure reform, and urban planning and design guidelines. These can be implemented through various strategies. First, in terms of legislative frameworks, all countries should develop and revise national constitutions and housing laws, in order to explicitly recognise and protect the right to housing. Secondly, there should be inclusive urban planning wherein principles of inclusivity and equity are integrated into urban planning processes. For example, mixed-income housing developments, inclusive zoning policies, and participatory planning approaches that engage communities in decision-making should be prioritised. Thirdly, legal mechanisms should be used to establish housing tribunals or specialised courts to adjudicate housing-related disputes and ensure enforcement of housing rights. Moreover, legal aid and support services should be provided for vulnerable populations facing housing insecurity.

Other recommended strategies include advocacy and social mobilisation, whereby civil society organisations, housing advocates,

and grassroots movements are mobilised to raise awareness about housing rights, advocate for policy reforms, and hold governments accountable for addressing housing inequalities. They also include education and capacity-building that entail training programmes and capacity-building initiatives for policymakers, urban planners, and community leaders on housing rights, equitable urban development, and participatory governance. In addition, they include establishing monitoring and evaluation mechanisms to track progress and ensure accountability towards realising the right to housing and the vision of pan-African cities. Finally, all the countries should foster partnerships between government agencies, private sector actors, NGOs, and international organisations to leverage resources and expertise for implementing inclusive housing policies and programmes. Collaborative efforts among African countries can also ensure access to safe, adequate, and affordable housing, particularly in the pan-African city. Such collaborative efforts would include information and knowledge sharing, joint infrastructure development, cross-border collaborations, technology transfer, and regional financing mechanisms. They would also include policy harmonisation, capacity-building, and public-private partnerships.

By implementing these recommendations, stakeholders can work collaboratively to address housing inequalities, promote social inclusion, and advance the vision of vibrant, inclusive, and equitable pan-African cities.

REFERENCES

- ACHPR (African Commission on Human and Peoples' Rights). 2011. Principles and guidelines on the implementation of economic, social and cultural rights in the African Charter on Human and Peoples' Rights (African Commission Principles and Guidelines). [Online]. Available at: <https://achpr.au.int/index.php/en/node/871> [Accessed: 22 March 2024].
- ADEDEJI, I. 2023. Nigerian urbanization and the significance of affordable housing. *Journal of Service Science and Management*, 16, pp. 351-368. <https://doi.org/10.4236/jssm.2023.163020>
- ADEDINI, S. 2023. Nigeria's cities are growing fast: Family planning must be part of urban development plans. *The Conversation*, 12 March 2023. [Online]. Available at: <https://theconversation.com/nigerias-cities-are-growing-fast-family-planning-must-be-part-of-urban-development-plans-199325> [Accessed: 30 January 2024].
- AFRICAN UNION. 2015. Agenda 2063: The Africa we want. [Online]. Available at: https://au.int/sites/default/files/documents/33126-doc-framework_document_book.pdf [Accessed: 5 June 2024].
- CAMBRIDGE DICTIONARY (n.d.). Inclusivity. [Online]. Available at: <https://dictionary.cambridge.org/dictionary/english/inclusivity> [Accessed: 19 January 2024].
- CARTWRIGHT, A., PALMER, I., TAYLOR, A., PIETERSE, E., PARNELL, S. & COLENBRANDER, S. 2018. Developing prosperous and inclusive cities in Africa – National urban policies to the rescue? Washington, DC: Coalition for Urban Transitions. [Online]. Available at: <http://newclimateeconomy.net/content/cities-working-papers> [Accessed: 4 June 2024].
- CITIES ALLIANCE. 2012. An urgent need for urban law reform in Africa. *Cities Alliance News*. [Online]. Available at: <https://www.citiesalliance.org/newsroom/news/cities-alliance-news/urgent-need-urban-law-reform-africa> [Accessed: 20 January 2024].
- FALOLA, T. & AGBO, C. 2019. The prospects and challenges of pan-Africanism. In: *Oxford Research Encyclopedia of Politics*. Oxford, UK: Oxford University Press. <https://doi.org/10.1093/acrefore/9780190228637.013.718>
- HENILANE, A. 2016. Housing concept and analysis of housing classification. *Baltic Journal of Real Estate Economics and Construction Management*, 4(1), pp. 168-179. <https://doi.org/10.1515/bjreecm-2016-0013>
- HOOPER, M. & ORTOLANO, L. 2012. Motivations for slum dweller social movement participation in urban Africa: A study of mobilization in Kurasini, Dar es Salaam. *Environment and Urbanisation*, 124(1), pp. 99-114. <https://doi.org/10.1177/0956247811435889>
- IBIMULUA, A.F. & IBITOYE, O.A. 2015. Housing policy in Nigeria: An overview. *American International Journal of Contemporary Research*, 5(2), pp. 53-59.
- IZUEKE, M. & OKECHUKWU, E. 2013. Urban planning problems in Nigeria: A case of Onitsha Metropolis of Anambra State. *Singaporean Journal of Business Economics and Management Studies*, 1(12), pp. 41-59. <https://doi.org/10.12816/0003828>
- JAMES, N. 2023. Urbanization and its impact on environmental sustainability. *Journal of Applied Geographical Studies*, 3(1) pp. 54-66. <https://doi.org/10.47941/jags.1624>
- JEFFERY, A. 2010. *Chasing the rainbow: South Africa's move from Mandela to Zuma*. Johannesburg, South Africa: South African Institute of Race Relations.
- KAMANA, H., RADIONE, H. & NYASULU, C. 2024. Urban challenges and strategies in African cities – A systematic literature review. *City and Environment Interactions*, 21, article 100132. <https://doi.org/10.1016/j.cacint.2023.100132>
- KOMU, F. 2022. Just access to land for affordable housing in Tanzania. In: Bollrich, E. (Ed.). *Building the just city in Tanzania: Essays on urban housing*. Dar es Salaam, Tanzania: Friedrich-Ebert-Stiftung (FES), pp. 21-37.
- KURYLA, P. 2024. Pan-Africanism. *Encyclopaedia Britannica*. [Online]. Available at: <https://www.britannica.com/topic/Pan-Africanism> [Accessed: 5 June 2024].
- LIMBUMBA, T.M. 2022. Just and secure access to adequate and affordable housing. In: Bollrich, E. (Ed.). *Building the just city in Tanzania: Essays on urban housing*. Dar es Salaam, Tanzania: Friedrich-Ebert-Stiftung (FES), pp. 73-88.

- MARUTLULLE, N.K. 2021. A critical analysis of housing inadequacy in South Africa and its ramifications. *Africa's Public Service Delivery and Performance Review*, 9(1), [Online]. Available at: <https://doi.org/10.4102/apsdpr.v9i1.372> [Accessed: 24 January 2024].
- MATHIAS, S. 2023. Rapid urbanization: How Tanzania's cities shape its economic destiny. *Tanzania Digest*, 6 September 2023. [Online]. Available at: <https://www.digest.tz/rapid-urbanization-how-tanzanias-cities-shape-its-economic-destiny/> [Accessed: 29 January 2024].
- MINOW, M. 2021. Equality vs equity. *American Journal of Law and Equality*, 1, pp. 167-193. https://doi.org/10.1162/ajle_a_00019
- MITLIN, D. & MOGALADI, J. 2013. Social movements and the struggle for shelter: A case study of eThekweni (Durban). *Progress in Planning*, 84, pp. 1-39. <https://doi.org/10.1016/j.progress.2012.12.001>
- MOETI, K. 2023. South Africa's deadly housing crisis. Project Syndicate. [Online]. Available at: <https://www.project-syndicate.org/commentary/> [Accessed: 31 March 2024].
- MUBANGIZI, J.C. 2008. Protecting human rights amidst poverty and inequality: The South African post-apartheid experience on the right of access to housing. *African Journal of Legal Studies*, 2, pp. 130-146. <https://doi.org/10.1163/221097312X13397499736589>
- MUBIRU, M.B. *et al.* 2022. A review of housing policies and their relevance to vulnerable households in sub-Saharan Africa. *International Journal of Social Science Research and Review*, 5(7), pp. 276-289. <https://doi.org/10.47814/ijssrr.v5i7.480>
- MWALIMU, A. 2023. Unpacking housing affordability, accessibility and livelihoods in Uganda. *Africa Centre for Media Excellence*, 23 August 2023. [Online]. Available at: <https://acme-ug.org/2023/08/23/covering-ugandas-housing-challenges/#:~:text=Uganda's%20urban%20centres%20face%20a,immediate%20attention%20and%20comprehensive%20coverage> [Accessed: 25 January 2024].
- NDEZI, T. 2022. A multi-sector approach to housing in urban Tanzania. In: Bollrich, E. (Ed.). *Building the just city in Tanzania: Essays on urban housing*. Dar es Salaam, Tanzania: Friedrich-Ebert-Stiftung (FES), pp. 90-99.
- NEWMAN, P. & JENNINGS, I. 2008. *Cities as sustainable ecosystems: Principles and practices*. Washington, DC: Island Press.
- OECD (Organisation for Economic Co-operation and Development). 2021. Housing policy objectives and obstacles. [Online]. Available at: <https://www.oecd.org/els/family/PH1-2-Housing-policy-objectives-and-obstacles.pdf> [Accessed: 21 March 2024].
- OHCHR (Office of the High Commissioner for Human Rights). (n.d.). The human right to adequate housing. *Special Rapporteur on the right to adequate housing*. [Online]. Available at: <https://www.ohchr.org/en/special-procedures/sr-housing/human-right-adequate-housing#:~:text=Adequate%20housing%20was%20recognized%20as,Economic%2C%20Social%20and%20Cultural%20Rights> [Accessed: 31 January 2024].
- SANI, M. 2022. A review of the Nigerian urban and regional planning law, Cap. 138 LFN of 2004. *Town and Regional Planning*, 80, pp. 77-87. <https://doi.org/10.18820/2415-0495/trp80i1.8>
- SEPAHA, P. 2023. Doctrinal and non-doctrinal research. *Law Colloquy*, 3 November 2023. [Online]. Available at: <https://lawcolloquy.com/publications/blog/doctrinal-and-non-doctrinal-research-/269> [Accessed: 18 January 2024].
- SIMONE, A.M. 2010. The social infrastructures of city life in contemporary Africa. Discussion Paper 51. The Nordic Africa Institute. [Online]. Available at: <https://www.files.ethz.ch/isn/123515/51.pdf> [Accessed: 19 January 2024].
- SINGHAL, A.K. & MALIK, I. 2014. Doctrinal and socio-legal methods of research: Merits and demerits. *Educational Research Journal*, 2(7), pp. 252-256.
- UDUU, S.O. 2023. Why Nigeria's housing deficit quadrupled in three decades. *Data Dive*, 30 June 2023. [Online]. Available at: <https://www.dataphyte.com/housing/why-nigerias-housing-deficit-quadrupled-in-3-decades/> [Accessed: 30 January 2024].
- UGANDA MINISTRY OF LANDS, HOUSING AND URBAN DEVELOPMENT. 2016. The Uganda National Housing Policy 2016. [Online]. Available at: <https://faolex.fao.org/docs/pdf/uga195930.pdf> [Accessed: 1 February 2024].
- UN-HABITAT. 2016. Country programme document 2016-2021. *United Nations Human Settlements Programme 2016*. [Online]. Available at: https://unhabitat.org/sites/default/files/documents/2019-05/un-habitat_country_programme_document_2016-2021_-_uganda.pdf [Accessed: 17 January 2024].
- UNDP (United Nations Development Programme). 2019. Policy planning, monitoring and evaluation handbook. [Online]. Available at: <https://www.undp.org/sites/g/files/zskgke326/files/migration/ge/3b5ea3a7403880e253ed7d548c645aa46e41d317660989cdf34ffedfab391c.pdf> [Accessed: 21 March 2024].
- UNITED NATIONS. 2018. World urbanization prospects: The 2018 revision [Online]. Available at: <https://population.un.org/wup/Publications/Files/WUP2018-Report.pdf> [Accessed: 20 March 2024].
- VALODIA, I. 2023. South Africa can't crack the inequality curse. Why, and what can be done. *The Conversation*, 14 September 2023. [Online]. Available at: <https://theconversation.com/south-africa-cant-crack-the-inequality-curse-why-and-what-can-be-done-213132> [Accessed: 24 January 2024].
- WCU (Western California University). (n.d.) Equity definition. [Online]. Available at: https://www.wcu.edu/_files/academic-enrichment/EquityRubric.pdf [Accessed: 21 March 2024].
- WORLD BANK. 2022. Urban population (% of total population) – Nigeria. [Online]. Available at: <https://data.worldbank.org/indicator/SP.URB.TOTL.IN.ZS?locations=NG> [Accessed: 30 January 2024].