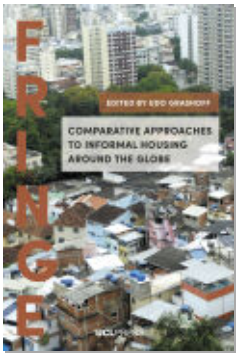
Comparative Approaches to Informal Housing Around the Globe

Grashoff, Udo



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2
Illegal housing: The case for comparison

Alan Gilbert

2.1 The value of comparative research

Comparative work complicates the task of research, but has the great advantage of discouraging overgeneralisation. All too often, academics are wont to draw conclusions from experience in a single city – making generalisations about the whole of Latin America, for instance, or sometimes about cities across the globe. A major strength of comparative research is that it constantly forces the researcher to recognise that every city is different. Observation that what happens in one city does not automatically happen in another constantly reminds the researcher to think harder about underlying processes. And, when there *is* a common pattern and a similar process across cities, we know for certain what we know.

Comparative work also avoids many of the dangers of transferring ideas from one city to another. Models and theories based on a single city or country are dangerous, because too many researchers manipulate their findings to match the model rather than adapting the model to reality. How many times has urban reality in a poor country been distorted to fit a model based on either Burgess's or Hoyt's models based on Chicago, or the national urban hierarchy criticised because it did not match the rank–size rule based on the distribution of cities in the US?

The application of models from one city to another without accounting for the differences between them has long been common housing and urban planning practice. Has building British-style council estates helped solve the housing problems of poor cities elsewhere? And, did building the equivalents of British new towns in the Global South help resolve the regional problems of those countries?[1]

Having conducted comparative work on housing and urban problems since the mid-1970s, I have learned a great deal about the virtues and difficulties of this form of research. My comparative work has included studies of informal housing in Bogotá, Mexico City and Valencia (Venezuela), rental housing in Caracas, Mexico City and Santiago (Chile), backyard renting in Cape Town and Johannesburg, housing subsidy programmes in Chile, Colombia and South Africa, and overviews of rental housing in the Global South.[2] A few of my doctoral students have added to this spread of experience by conducting comparable studies in other cities.[3]

2.2 Illustrations

The kinds of insights that have arisen from my comparative work on informal housing that might have been missed using other approaches include the following examples.

The form of illegal housing

In his statement orienting the subject matter for the 2017 conference 'Comparative Approaches to Informal Housing Around the Globe', Udo Grashoff asked: 'Why is illegality found in every country of the world but is far more common in poorer nations – for example, why are planning rules upheld in most developed countries but ignored in the poorer districts of low-income cities and sometimes in the richest areas too?' The simplest answer to that question refers to differences in state attitudes, which, in turn, are strongly influenced by income levels and the cost of land. Governments in developed countries are more able to provide social housing, and home owners can obtain finance to buy formal housing. In poorer countries, informal housing acts as a safety valve. Given enormous housing deficits and the state's inability to house its population, a politically expedient way of avoiding conflict and maintaining economic growth is to permit informal settlement. Land is a political tool used by many clientelist politicians and sometimes even by autocratic leaders to keep society ticking over.[4] Generally, it has worked to keep social protest to a minimum – albeit at the cost of producing large areas of semi-serviced, environmentally damaging, peripheral and sometimes dangerously located settlements.

The form of informal housing shares many similarities across much of Africa, Asia and Latin America and in the last couple of decades even in

Southern Europe and the border areas of the United States.[5] These common elements are that the housing is built on land that lacks title and which has often been occupied against the wishes of the owners and/or the authorities. The land occupied is usually marginal, either in the sense of distance from employment and formal housing areas or in terms of terrain, too often built on hillsides or close to river courses and liable to natural disaster. When occupied, it is typically land of little economic value, and not infrequently it is owned by the state.

Homes are typically built through some degree of self-help, with the owners organising construction, although very often with the help of paid labour and advice from knowledgeable friends and family.[6] The buildings lack planning permission, and, more importantly, the settlements begin without any services or infrastructure. Electricity, water, roads and schools arrive slowly, often the result of petitioning the authorities, but delivery is highly dependent on the capacity of the government or the private sector to provide those services. The occupants of these settlements are universally poor, but, contradicting conventional wisdom, are usually people who have lived for some time in the city. New migrants typically rent accommodation or share the homes of longer-established kin. Some self-help settlements are undoubtedly 'slums', but many more, particularly in Latin America, are zones with a proven capacity for improvement.[7] The fact that brick-built homes with most kinds of service and infrastructure dominate in once-flimsy settlements is testament to that fact. I dislike the term 'slum' and would encourage readers to avoid it as far as possible, because it denigrates all who live in poor settlements and conjures up all kinds of negative stereotypes.[8]

The similarities between informal settlements conceal many significant differences. My comparative work in Latin America and South Africa has helped demonstrate that the means by which the poor obtain land differ considerably between countries and even between cities in the same country. In Venezuela, the invasion of land has long been very common; but in Bogotá, Mexico DF and Quito, invasions have seldom been permitted and illegal subdivisions have long been the normal method of acquiring land; in Santiago, land invasions were common up to 1973, but have been rigorously opposed ever since.[9] The specific form of land occupation that develops in any city depends on the local pattern of land ownership, the price of peripheral land, the attitude of the political authorities, the political organisation of the poor, the physical nature of the terrain and the pace of urban growth. The differences in forms of land occupation between Bogotá, Mexico City and Valencia (Venezuela) in the 1970s, and indeed the variations within them, are apparent in Figure 2.1.

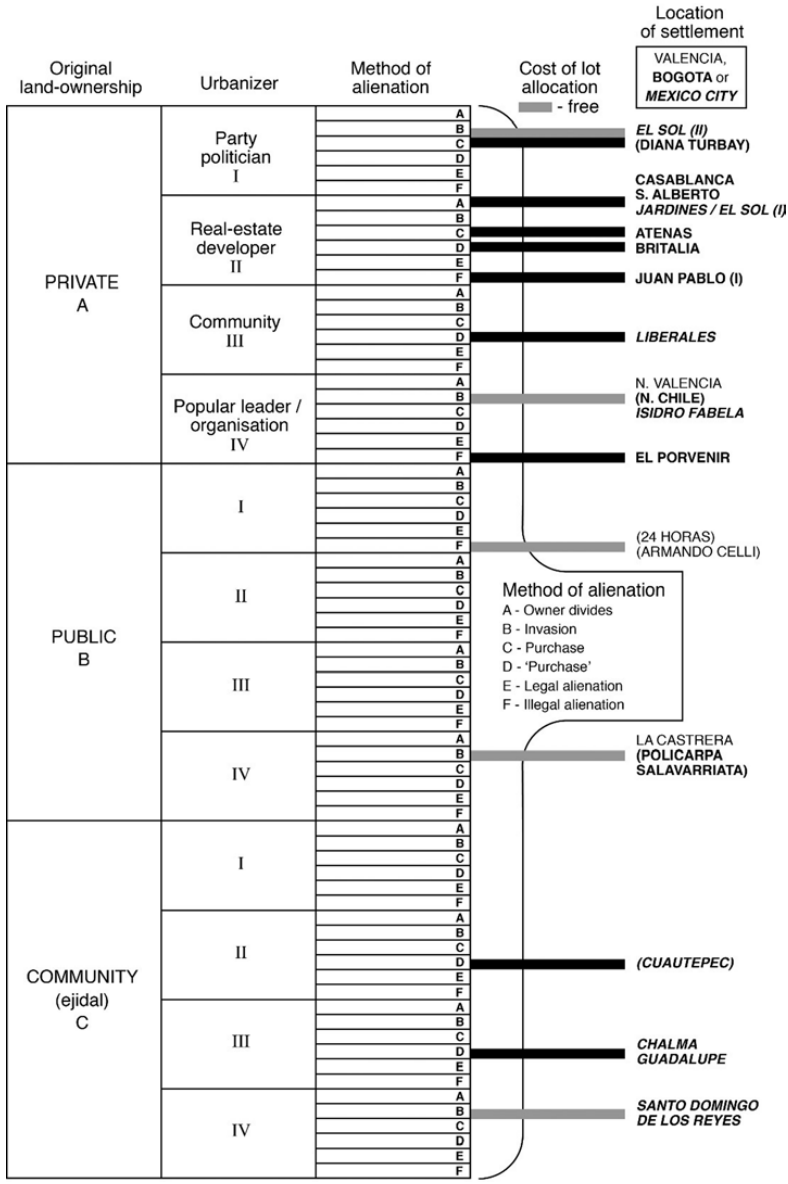

Figure 2.1 Varying forms of irregular land occupation in Bogotá, Mexico City and Valencia. Source: Alan Gilbert and Peter M. Ward, *Housing, the State and the Poor: Policy and Practice in Three Latin American Cities* © Cambridge University Press, 1985. Reprinted with permission.

In his original statement relating to the June 2017 conference, Udo Grashoff asked: 'What can we learn from comparisons of illegal housing construction at the outskirts of, say, Warsaw, Izmir and Buenos Aires?'[10] My research suggests that the processes determining the form of illegal housing are locally defined. The building manual in Bogotá is stored in the heads of local bricklayers and plumbers. They build their own houses using the techniques they have learned on the local building sites. They then pass on that knowledge to friends and relations, often using their own skills to help others build their homes. Because skills are learned locally, they are culturally specific. This explains why self-help housing in many Chilean cities looks very different from that in Caracas, Lima or Rio. One housing minister in Chile told me that the wooden self-help homes in Santiago are the outcome of local know-how; while, in other parts of Latin America, people have experience of building in brick, 'here in Chile we are carpenters'. The same presumably applies in South Africa where virtually the whole of Khayelitsha settlement in Cape Town is built of wood and corrugated iron; virtually everything is single-storey.[11] No doubt lower per-capita incomes explain something of the difference, but local know-how appears to be the key factor.

Rental housing

Much of the literature and most government policy documents generally assume that in developed countries most people own their homes. However, comparison soon reveals some notable exceptions. In 2016, owners accounted for only 43 per cent of households in Switzerland and 52 per cent in Germany.[12] In the largest cities, very few Germans or Swiss own their own homes: 11 per cent in Berlin, 14 per cent in Geneva and 23 per cent in Zurich.[13] Today, rates of ownership are sometimes even falling; in the US, the proportion of owner households fell to a 50-year low of 62 per cent during 2016.[14] In major cities of that bastion of home ownership, tenant households sometimes constituted a substantial majority: in New York and Los Angeles, 69 per cent and 62 per cent respectively.[15]

In developed countries, most wealthy people own their home while poorer groups rent or share. By analogy, because most people in poor countries are poor, logic would suggest that the majority should rent. However, this is not the case. Rates of home ownership in most of the poorer countries in the world tend to be higher than that in many developed countries: 87 per cent in Thailand, 73 per cent in Chile and 81 per cent in Mexico, compared with 63 per cent in the UK.[16] In much of Africa

and Asia, the dominance of ownership is largely due to the higher proportion of people living in the countryside; few people in rural areas rent their home, they typically live in flimsy self-help housing. In highly urbanised regions, such as Latin America, and in many cities in Africa and Asia, people occupy their own homes, the result of illegal or irregular forms of settlement.

Within poorer cities, the assumption that most of the rich own and the poor rent or share is undermined by the process of illegal settlement. Recent figures from Latin America show that ownership, whether formally documented or not, tends to be the preserve of both the better-off *and* the poorest.[17] The rich have access to mortgage financing and the poor are prepared to live in self-help housing. It tends to be younger families with middling incomes that rent. While incremental housing is ubiquitous in the Global South, it is not an option that is available equally to every family. In some cities, governments prevent access to public land, the usual target of land invaders, and in other cities, private owners protect their land from invasion. In many cities in China, India and Zimbabwe, the eviction of self-help settlers is commonplace.[18]

In apartheid South Africa, evictions were frequent and land invasions were prohibited. After 1985, however, the state lost control of the 'African' townships and land invasions became common. Similarly, in Chile, land invasions were common in the 1950s and increased in number up to 1970 when the main political parties encouraged their supporters to occupy land as a means of acquiring votes in an increasingly fevered election campaign.[19] The military government that removed the socialist administration of Salvador Allende in 1973 was determined to prevent future invasions.

The availability of free land has an important effect on tenure choice. In the metropolitan areas of Brazil, the proportion of home owners ranges from a high of 74 per cent in Belém and Manaus, where invasions have been possible, to a low of 48 per cent in the Federal District, where they have long been prohibited.[20] In Ecuador, land invasions are common in lowland Guayaquil but infrequent in highland Quito. The result is that many more poor people live in their own house in Guayaquil than in Quito (Figure 2.2). Ownership among the poor (deciles one and two) is higher among the poor than among the rich in the former, but the pattern is reversed in the latter.

Comparison shows that generalisation can be dangerous and that satisfactory explanations of tenure patterns demand knowledge of local house price/income ratios, land markets, mortgage systems and state policy. Recent experience in England also suggests that tenure patterns

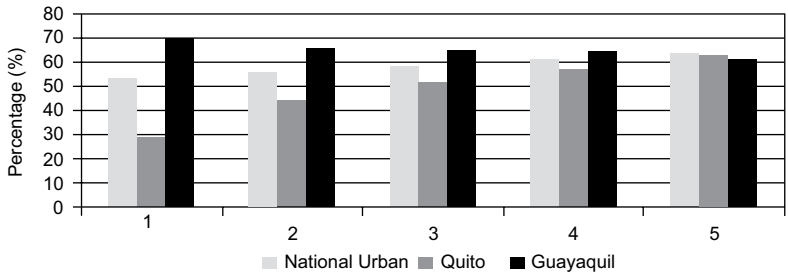

Figure 2.2 Home owners in Ecuador by household income decile. Source: Ministerio de Desarrollo Urbano y Vivienda, Ecuador.

can change quickly over time; the rate of home ownership fell from a peak of 71 per cent in 2003 to 63 per cent 10 years later.[21] If house prices rise much faster than incomes, aspirant owners are forced to remain as tenants or sharers.

Landlord and tenant

Unlike the stereotypical view of the British or North American slumlord, and the reality of large-scale landlordism in a 'Third World' city such as Nairobi, few landlords across the globe seem to own many properties.[22] But the nature of landlords varies considerably. In some countries, like Germany, commercial companies own much of the rental stock, and in other parts of Europe various forms of social housing are important.[23] The small landlord is a significant presence everywhere but dominant in Latin American cities. And, while a few landlords are prosperous, landlords are drawn from every social class and a majority are poor. The only common ingredient among landlords is that they tend to be older than their tenants, many relying on the rental income to finance their retirement.

The form of rental housing also varies considerably. The better-off typically let flats in formal housing areas. Poorer landlords tend to live in self-help areas and many accommodate tenants in rooms or flats created in their own home. Many parts of consolidated self-help in Bogotá contain more tenants than owners.[24] In some places, however, the landlord rents out space in the backyard. As noted earlier, this was commonplace in Chile when the military regime banned land invasions and removed many of the existing settlements[25] and in South African cities during, and since, the apartheid regime.[26] But informal renting has also developed in a variety of forms elsewhere: in the backyard council homes of South

Africa, in the informal settlements of Tanzania and Kenya and in the rented plots in India (*thika* tenants).[27]

If, as it appears, tenants are almost universally younger than owners or landlords, valid generalisations then begin to break down. In social housing, many tenants are elderly. In the past, most migrants to cities moved into rental accommodation, but, where city-ward migration has continued over several decades, new arrivals already know someone in the city with whom they can stay. But even then, differences appear. In West Africa and in Mexico, space is normally found for relatives. But, in Bogotá, young adults are more likely to rent rooms. In Santiago, *allegados* (sharers) are almost always relatives;[28] in Soweto, South Africa, most are strangers.[29]

Common values

Returning to Udo Grashoff's pre-conference statement, he also asked whether squatting is 'a devious route to Capitalism? To what extent is the goal of informal housing in Latin America to acquire property rights? Is the squatters' attitude to property different in the South (and perhaps East) and in the North-West?'[30] My research suggests that most people want to acquire property across the globe and that attitudes in Latin America are most certainly pro-ownership. When I have included the question in surveys, the poor have answered universally that they want to be owners. When I posed this question to owners in poor settlements in Bogotá, few had any doubts that ownership was a good thing.[31] One owner spoke proudly of the 'glory of the house', another asserted that 'he who has a house is a king' and a third claimed that 'anything purchased is worth it'. When presented with a list of the specific advantages of ownership, two answers dominated the replies: 60 per cent referred either to the benefit that ownership brought in terms of having something to leave to the children or to the security that it offered for one's old age. As one owner put it, 'for those with nothing, to have a secure roof for oneself and the children is a good investment'. Their replies were similar to those one might expect from owners in Britain. Is ownership a universal value? When I have talked with ministers of housing in Latin America about a policy for renting, they have frequently suggested that I do not understand local cultural values – everyone wants to own! This is as integral to Brazilian, Chilean or Colombian culture as it is to that of the British. Elsewhere, I dispute that opinion, arguing that the desire for ownership has largely been created by governments and the construction industry.[32] Governments have offered subsidies and cheap

mortgages to aspirant owners. 'The virtues of ownership have also been peddled by commerce, advertising and the building industry. It is part of the consumer society that promises everyone a home, a car and a television, and one that in an environment of rising house prices offers generous economic rewards.'[33] In any case, as I have already shown, wanting to own and the ability to do so are not the same thing. And what are we to make of Germany, where some of the world's most materialistic citizens are content to park their BMWs and Mercedes outside their rented homes – or the Swiss, who hang their cuckoo clocks on rented walls?[34] The desire for a secure, safe and comfortable home is universal and is not the same thing as home ownership. Even superficial comparisons demonstrate that fact.

Learning from others

Grashoff asks whether 'squatters in different parts of the world learn from each other? To what extent is there a global transfer of experiences and practices?'[35] My answer is that such learning is rare. Organisers of informal and illegal housing settlements are opportunistic and seldom students of what happens elsewhere. Indeed, there are few possibilities, and little time and money, for them to do so. They rarely, if ever, attend international conferences to compare notes. And would they learn much if they did? Informal housing developers need to understand the nature and dynamics of the local land market and what the authorities will tolerate or even encourage. Is there a local politician who wants to obtain support, who will persuade the police to turn a blind eye if an invasion takes place? Clientelism and populism play a key role in permitting informal settlement, and local circumstances count for everything.

Grashoff also asks whether 'it would be interesting to test existing attempts to systematise illegal housing (such as typologies) which work well in certain regions regarding their usefulness in different parts of the world'.[36] In general, my answer to this is positive. Indeed, it is current practice for UN Habitat, Cities Alliance, the multilateral development banks and numerous NGOs to include other cities' experiences (with upgrading, titling and general housing policy) in their advisory and loan programmes.[37] But, of course, there are dangers with the communication of such knowledge. De Soto's trumpeting of the idea that giving informal settlers title deeds will automatically solve the problem of shelter in poor cities constitutes a very simplistic approach.[38] Similarly, employing the typology of the slum is less than helpful insofar as it can stigmatise groups already marginalised in many ways by policymakers.[39]

But, even when experience elsewhere *would* be useful, many of those who design policies fail to study that experience. While the international advice is that evicting informal settlers should be avoided in most cases, because it tends to make the housing situation worse, governments in China, India, Zimbabwe and several others have proceeded to evict thousands of such people.[40]

It is also true that, even when they accept advice in designing their housing and urban policies, most authorities in the South have tended to look in the wrong places. I have long complained that the authorities in the Global South tend only to consider experience in the Global North. The list of transfers is long: architectural tastes (for example, English style, then Californian, more recently postmodern); master plans designed by influential European architect–planners like Karl Brunner, Le Corbusier and Otto Koenigsburger; social housing for rent, new cities (Abuja, Brasilia, Ciudad Guayana, Dodoma and Islamabad); and shopping malls, fast-food restaurants, gated communities and CCTV cameras (virtually everywhere).

Few lessons have been learned from places where conditions are similar. It is only recently that learning from appropriate sources has become more common in the planning field. The spread of Bus Rapid Transit systems from Curitiba to Bogotá and thence to cities in China, Mexico, South Africa and even to Europe and North America is a relatively new and generally welcome phenomenon.[41]

2.3 Meaningful comparison

A major problem facing comparative research is the danger of superficiality; it is difficult to steer a safe path between the desire for generalisation and the need for detail. Sufficient detail can only be assured by conducting case studies 'in-depth', something which 'is difficult to do … on more than a few cases'.[42] Apart from anything else, too many case studies simply produce too much information to assimilate. Even if the material can be understood by the researcher, it is difficult to convey the necessary details to a reader without writing at far too great a length. Only by exceeding the tolerance of most publishers is it possible to provide enough explanation for the reader to understand the processes operating at the individual city level while concentrating on cross-city comparisons.

LSE Cities, part of the London School of Economics, has compiled detailed statistics on the form and structure of a number of cities across the world. They argue that: 'Behind the statistics of global city growth

lie very different patterns of urbanisation, with diverse spatial, social and economic characteristics that dramatically affect the urban experience'.[43] Given such variations, any comparative study faces a fundamental question: what is the basis of a good comparison? In my opinion, some comparisons make sense, whereas others do not. In general, it seems sensible to concentrate on similar rather than totally dissimilar phenomena or processes. The principal reason for making a comparison is to shed light on how some common process produces different kinds of results in different places, or to examine why different processes produce similar results. If both processes *and* results differ, is there much point in the comparison? If, for example, we were to compare the housing situation of New Yorkers with that of Australian aborigines living in the Outback, would we learn anything very useful about housing or homelessness?

In this regard, I differ profoundly in my view from the authors of more recent efforts at comparative urban research insofar as they are too eager to compare like with unlike. For example, Robinson's argument that 'the comparative gesture can be applied to all cities as long as a rigorous methodology is adopted in the comparison conducted' is inherently risky.[44] Dupont et al. advocate a similar argument: 'We adopt the same approach as other scholars engaged in comparative urban research … by rejecting the position of incommensurability: the often unarticulated assumption that no comparison is possible across cities that are regarded as substantially differentiated not only by their levels of development, but also by cultural or policy context, economic system or political environment'.[45] Fortunately, they did not follow that premise when conducting their own research; their own urban examples – Rio de Janeiro, Cape Town, Chennai, Delhi, Durban and Lima – share many commonalities.

My own approach has consistently followed Abu Lughod's advice that there must always be a basis for 'legitimate comparison'.[46] In comparing three North African cities, she looked 'first at what they have in common, then at the major differences among them, and, finally, at the common processes (applied in variable degrees) which have led to the wide and very real differences which we now find'.[47] As such, I find Robinson's advice problematic, viz: 'A very important analytical change in defining a new repertoire of comparative practice is to abandon the hopeless effort to apply a quasi-scientific rigour to case selection based on attempting to control for difference across cities'.[48] Perhaps perversely, given their earlier comment on the issue, Dupont et al. made strenuous efforts to compare like with like in their own comparative study.[49] My own preference for 'quasi-scientific' rigour remains strong, and I commend the efforts of several scholars for persisting in this 'hopeless' effort.[50]

Conducting comparative research is a complicated process and the term is often used to disguise many superficial efforts at comparing cities.[51] It most certainly does not include what Ragin calls 'extensive, variable-oriented work'.[52] While I have conducted just such work in international overviews, they do not constitute what I consider to be proper comparative research. My preferred method is to look in depth at a limited number of broadly similar cities in the style of Abu Lughod's earlier recommendation. How best to do this is not easy to resolve.[53] A key decision involves whether to use one team or several. The main advantage of using local teams is that the researchers already know a great deal about their own cities and often have ready-made contacts in the bureaucracy and in the settlements. Being known in the city is a great advantage, at least in those cities where there are not great schisms based on politics, race, religion or ideology. For an outsider, particularly a foreigner, getting to know a city takes time.

However, it would be wrong to pretend that there are not difficulties with this approach. First, the use of separate teams, while clearly bringing major advantages, does complicate the task of coordination and can bring conflict. I remember one sticky patch in a comparative study of Chile, Mexico and Venezuela over the methodology to be employed; differences over the balance between a quantitative approach and a more anthropological approach led to arguments. A modus vivendi might not have been established at all without our having shared a few drinks. There were also some differences with respect to policy formulation; we had a lively debate in our final meeting about whether a common policy could be devised for cities as distinctive as Caracas, Santiago and Mexico City.

A further problem is that each team is seldom as interested in the comparative element of the research as in the part relating to their own city. Why study something that is of minor importance in my city even if it is critical elsewhere? In conducting my research, I have usually relied, in part, on surveys, often employing separate teams, but always following a similar approach and employing a similar questionnaire in each city. The questionnaire would vary to reflect different conditions in each city, but would ensure that similar kinds of information were collected in each city. Unless this was carefully controlled, different local situations and different team interests would produce substantially different data sets, making comparison impossible. Each team was permitted to add some questions to the survey, but none was allowed to eliminate any of the questions being asked elsewhere. They also had to use a similar method for selecting survey settlements and sampling within them. However, they were given sufficient resources to pick an additional settlement or two to reflect major

differences within their city. This approach meant that we could collect broadly comparable survey data across the three cities.

2.4 Conclusion

Despite the many methodological difficulties it poses, I have no doubt that comparative research is essential. It is intellectually stimulating because it forces the researcher to eschew simple statements of process by demonstrating either that in another city the same phenomenon is explained by different processes or that different phenomena are brought about by the same process. Comparison creates confusion, but it is creative confusion. It forces any investigator to think harder than they would have done otherwise. It certainly discourages what Walton and Masotti call 'parochialism'.[54]

Comparison is, of course, no guarantee of good research, but insofar as it tends to discourage the facile conclusion, it is a strong stimulus to better research. If the researcher can avoid the temptation to conclude either that cities are wholly similar or that they are completely different, the full virtue of the comparative method is revealed.

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