Comparative Approaches to Informal Housing Around the Globe

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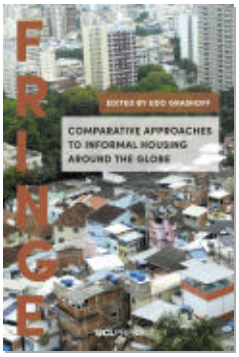

Published by University College London

Grashoff, Udo.
Comparative Approaches to Informal Housing Around the Globe.
University College London, 2020.
Project MUSE. muse.jhu.edu/book/81366.

For additional information about this book
https://muse.jhu.edu/book/81366

[Access provided at 10 Feb 2023 19:17 GMT with no institutional affiliation]

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Towards critique and differentiation: Comparative research on informal housing

Udo Grashoff and Fengzhuo Yang

Various sources indicate that up to a quarter of the world's urban population lives in precarious neighbourhoods such as *shanty towns*, *favelas*, *barriadas*, *bidonvilles*, *bustees*, *kampungs* or *gecekondular*. Such a wide variety of forms, found in different political and social contexts, is indicative of the complexity of urban informality, and invites comparative approaches.[1] But only a few scholars have engaged in rigorous comparisons beyond the 'comparative gesture' of light-touch references to different contexts made thus far.[2] As one scholar aptly lamented, 'promising edited collections, which take care to juxtapose case studies from different parts of the world, still do so without allowing them to engage … with each other'.[3] Likewise, many conceptual studies include a comparative argument but use examples mainly for illustrative purposes, and do not examine them comprehensively. Often, studies rather hint at comparisons than fully realising them. But it is not our intention to sneer at colleagues for not having hit the target. Instead, this introductory chapter presents various examples of good practice. It surveys existing comparative studies on informal housing, to provide a sense of how far comparative research has come, and asks how the method of comparison has been used in different disciplines as a way to understand differences, to discover unexpected similarities and to differentiate (and sometimes even subvert) previously held assumptions. The survey begins with paired comparisons and progresses toward more complex approaches such as multi-case analysis and typologies. It also specifies where the studies of this volume contribute to the field of research.

1.1 Paired comparisons

The basic comparative operation works with two entities, and such a straightforward approach can be easily denounced as reductive. Colin McFarlane and Jennifer Robinson, for instance, have levelled the criticism that even the most rigorous of existing comparative methodological conventions reinforce a 'narrow range of comparisons through a continuing quasi-scientific approach inappropriate to the multi-dimensional, contextual, interconnected, and endogenous nature of urban processes'.[4] They have a point here, but the very simplicity of paired comparison is also its great strength. While it is true that paired comparisons work with binaries, they don't necessarily reinforce them. As the following examples demonstrate, paired comparisons can reveal surprising similarities as well as illuminate differences. And they don't have to be superficial or simplistic.

A seminal example is Alan Gilbert's paired comparison of informal housing in Valencia (Venezuela) and Bogotá (Colombia).[5] His article scrutinises the countries' respective political, social and economic contexts to understand why low-income housing areas became established in different ways in the two cities: land occupation as the main approach to informal housing in Valencia, and illegal subdivision of land in Bogotá.[6] Gilbert's study analyses a variety of factors such as the role of patronage, reactions of landowners and the police, state regulation, situational factors such as elections, and many others. Such scrutiny makes clear that informal practices emerged according to the different opportunity structures. The comparison reveals how well adjusted to the respective local power relations the different informal strategies were.[7]

Another comparison that examines different outcomes of analogous practices is a 2004 study of life in informally subdivided residential and commercial buildings in São Paulo (Brazil) and Johannesburg (South Africa). In both locations, the authors find people living in cramped conditions with poor sanitation, lighting and ventilation, and lack of privacy. The differences seem to be largely a result of different kinds of people resorting to that informal practice. The authors find more social cohesion (including family ties) among squatters in São Paulo than among the inhabitants of disused buildings in Johannesburg, who are 'mostly transitory single males'. In addition, the existence of influential urban housing movements in Brazil is considered to be conducive to the improvement of informally subdivided buildings – in contrast to Johannesburg, where squatters have little voice.[8]

Such comparisons indicate that similar practices are often shaped significantly by the local context, often with the effect that differences

stand out. A study of informal settlements in Dhaka (Bangladesh) and Ankara (Turkey) illustrates this. In both countries, people in informal housing were found to have a similar economic status and to perform most of their daily activities outdoors. But the physical outlook and spatial structure of *bustees* and *gecekondular* differ remarkably. *Bustees* are densely populated, consisting of temporary structures built out of poor materials, and tenancy is insecure and expensive: their dwellers pay higher rents per square metre than any middle-class family. *Gecekondu* settlements, by contrast, are both more permanent and spacious. Most residents, note the authors, have 'more open space than a middle income household in the urban area in some Turkish cities'.[9] The diverging degrees of freedom are associated with property relations. Whereas *gecekondu* inhabitants are more or less owners of their houses, *bustee* dwellers are predominantly tenants without rights.[10]

One spirited example of bridging great distances is Amanda Dias' comparison of Palestinian refugee camps in Lebanon and favelas in Brazil.[11] Based on the assumption that both of these informal settlements establish a specific 'intellect of the margin' (dominated either by militancy or by artisan and intellectual activities), the French anthropologist compares several aspects of social structure in the two countries, such as self-perception, communal activities and internal governance, and finds many similarities. She observes that those living at the margins of the city and the state identify affirmatively with the informal settlement and try actively to build a community culture. Both have problems with internal management but they are different. Inhabitants of both settlements also differ in their perception of temporality.

Whereas Dias' comparison ultimately arrives at theoretical conclusions, for other comparative studies theory is the starting point.[12] In a study led by assumptions of post-Fordist theory, Dutch sociologist Hans Pruijt ties the distinct trajectories of squatting in Amsterdam and New York to macro-structures, namely the urban regime relying on market forces in the US, and the Dutch way of state intervention and redistribution.[13] According to Pruijt, the urban regime in New York – which is less conducive to squatting – has led to the widespread co-optation of housing movement groups that mainly act as service providers, in contrast to Amsterdam, where squatters embarked on a more proactive strategy dubbed 'flexible institutionalisation', due to the more squatter-friendly context there.[14] While such a theory-led approach can account for the fact that squatting faded away in New York whereas flexible institutionalisation kept the subversive potential of the movement alive in Amsterdam (as evidenced by its 'willingness to cause disruption'), this argument was

limited to the 1970s.[15] A decade later, during a second wave of squatting in New York, the self-understanding of these squatters was similar to that of the squatters in Amsterdam.[16] The different contexts, however, once again caused diverging outcomes. Confronted with the stricter protection of property in the US, squatting in New York was characterised by concealment, relative isolation and avoidance of privately owned buildings. Moreover, rigorous comparison would reveal a different attitude towards social housing projects. In Amsterdam, there was more acceptance of such projects, due to a more reliable, transparent and participatory policy safeguarding the affordability of new housing, and indeed there was also more official recognition of the squatters' interests (in relation to rehousing, for instance).[17]

Pruijt's research also shows that paired comparisons carry the risk of producing simplified dichotomies. For example, Justus Uitermark pointed out that Pruijt's emphasis on contrasts between the Netherlands and the US led to a downplaying of internal conflicts and divisions within Amsterdam's squatting movement.[18]

A decade later, Pruijt reshaped the comparison and approached it in a more holistic way. Instead of mainly looking at the occurrence of squatting, as such, he sought to measure and grade the influence of squatting on urban policy, as well as the extent of cultural and economic changes brought about as a result of squatting. Pruijt developed a four-stage model by identifying different degrees of influence of squatter movements on society.[19] Furthermore, a closer look at the history of housing movements in New York revealed a synergetic dynamic of autonomous and institutionalised movements. The activities of autonomous squatters faced substantial restrictions, but their actions opened up opportunities for institutionalised groups. Conversely, official programmes such as 'homesteading' helped legitimise squatting.[20] As a whole, Pruijt's comparative research illustrates the remarkable potential of comparisons for a nuanced understanding of the local dynamics of informal housing in different cities of the Global North.

Likewise, a couple of similar studies have used comparative approaches to analyse striking differences in Europe. In view of the hundreds of legalised squats in Berlin (as opposed to just a few in Madrid), one study asks why legalisation of squatting is so different in the two European cities. The authors identify two main factors: the squatters' political strength and their attitude towards legalisation. Militant resistance against evictions put Berlin's squatting movement in a strong position and facilitated straightforward negotiation. A high number of squatters finally accepted the option of legalisation provided by the

state. Conversely, resistance in Madrid remained isolated, most squatters rejected any kind of negotiation with the state, and the few legalisations that took place involved a tedious and long-winded procedure.[21]

An important aspect of research on informality focuses not on informal practices, as such, but on policies. Current tendencies towards the criminalisation of squatting are the focus of a relatively recent essay that includes a few comparative elements. According to the authors, anti-squatter discourses in England and Wales, as well as in the Netherlands, have given rise to moral panic. But, in the United Kingdom (UK), criminalisation of squatting has mainly been driven by fear of property theft, whereas in the Netherlands the main factor has been xenophobia. Even more pronounced are differences between British and Dutch discourses in defence of squatting. In the UK, 'supportive discourses' emphasise the vulnerability and homelessness of the squatter population. In the Netherlands, defenders of squatters frame them as informal providers of cultural and social services.[22]

While most scholars in the Global North focus on Western Europe, few have dealt with informal housing in Eastern Europe. In his doctoral thesis, historian Peter Mitchell broke new ground with his comparison of squatting in the divided city of Berlin during the 1970s and 1980s. In both the east (the German Democratic Republic, or GDR) and the west (the Federal Republic of Germany, or FRG), policies of urban renewal were similar, and squatting emerged almost at the same time in inner-city neighbourhoods. But the comparison found fundamental differences: 'Whereas squatting in the GDR was practised covertly and individually (or as a familial undertaking), in the FRG it was undertaken overtly and collectively. Often tacitly tolerated by the local authorities in East Berlin, the history of squatting in West Berlin was, by contrast, rooted in conflict.'[23]

One might be inclined to ascribe the differences to the different political regimes – the eastern dictatorship and the western democracy. The comparison of squatting in Leipzig and Leiden in Chapter 4 of this publication, however, questions such simple causality and suggests that, even in different political and social contexts, squatting practices can be very similar.

Comparative inquiry is often driven by ideas that stem from expertise on one particular area. Eliza Isabaeva's study in Chapter 5 of this volume is based on extensive fieldwork in Kyrgyzstan, and she refers to similar processes of collective land occupation in neighbouring Kazakhstan to deepen our understanding. A study from 1965 embarks on a similar strategy. It contrasts the chaotic and disastrous demolition and

deportation policy towards a squatter settlement in Manila in 1963 with the straightforward process of resettlement of squatters in Hong Kong at the same time. The author identifies the different political regimes and administrations as the main cause of this stark contrast. Whereas colonial rule in Hong Kong facilitated a consistent policy, the division of interests rendered Manila's administration ineffective to a large extent.[24]

Striking differences between countries in the same region are also the starting point for a comparative analysis of slum-upgrading in Africa. While international development finance is undoubtedly a fundamental supporting factor, it worked well in Harare (Zimbabwe) but not in Kampala (Uganda). The success of slum-upgrading in Harare can be associated with more supportive policies at city level, and the Zimbabwean constitutional right to housing. Moreover, occupation of mainly privately owned land in Uganda made interventions more difficult than in Zimbabwe, where most of the squatted land belonged to the state.[25]

A related topic is unauthorised construction. Rachelle Alterman and Inês Calor explore the significant 'twilight zone between legal and illegal development' in their comparison of enforcement of building codes in Portugal and Israel. They analyse detailed differences in the strictness of the regulations and the efficiency of the enforcement system in the two countries, and offer a number of lessons to be learned from both sides. It is particularly the systematic, detailed and precise analysis of policies and outcomes that characterises this study.[26] In Chapter 8 of this book, they take this a step further and discuss the transfer of the concept of informal housing from the Global South to the North.

Quite a few existing studies find the same phenomenon to be the result of different processes. Just such a paired comparison that bridges great geographic and cultural distances to uncover astonishing similarities is the 2010 collaborative study on different forms of informal housing in Hong Kong and Canada.[27] The authors compare rooftop squatters in Hong Kong and squatters occupying basement apartments in Calgary, and ask how these two prosperous cities deal with the two forms of illegal housing. In both cities, they find a similar policy of selective toleration, with redefinitions of legality and little initiative for reinforcing the law on the part of the state. And, in both places, the lack of collective action among those living in unauthorised housing facilitated such a policy. Similarly, in their examination of several political aspects, Clarissa Campos and Miguel Martínez point out similarities between squatting movements in Brazil and Spain in Chapter 6 of this volume.

Last but not least, informal housing has a historical dimension that is worth exploring. It represents 'probably one of the oldest informal

practices that evolved in conjunction with the institution of property rights'.[28] Solutions such as legalisation or temporary toleration of informal housing rely on Roman law, which had provisions for accommodating the interests of squatters. Historical comparisons can highlight similar processes in distinct periods, and support a sober and pragmatic attitude towards informality.[29] Olumuyiwa Adegun provides one example of this approach with his comparison of shanty towns in nineteenth-century Europe and twentieth-century Africa in Chapter 9 of this book.

1.2 Comparisons of formal and informal housing

Hernando de Soto's advocacy of land titling as a means to alleviate poverty has unleashed a lively debate around that idea and practice.[30] Comparative approaches are being used in this debate both in opposition and affirmatively. Economists Sebastian Galiani and Ernesto Schargrodsky studied a squatter settlement in the outskirts of Buenos Aires where legalisation remained incomplete. This provided the authors with the opportunity to compare squatters living in precisely the same context with, and without, land titles. The comparison did not entirely confirm de Soto's optimistic expectations regarding accumulation of capital, but showed that squatters with titles carried out significantly more building work on their homes. Moreover, their legal status correlated with positive effects on life and health. Hence, the authors conclude: 'In sum, entitling the poor increases their investment both in the houses and in the human capital of their children, which should contribute to reduce poverty in future generations.'[31] One might add, titling made them more supportive of capitalism. Interviewees with titles declared to hold more 'market beliefs' than their neighbours without land titles.[32] Rodrigo Salcedo's study of the last major slum in Santiago de Chile, based on interviews with inhabitants of a former illegal settlement, observes a similar 'transition toward a middle-class identity'. Most interviewees wanted to leave the past behind, as they are 'tired of participation and just want to live a more private or intimate life'.[33]

By contrast, many comparisons of formal and informal housing question the negative reputation of informality and challenge the dichotomy itself. David E. Dowall argues that Karachi's informal 'housing delivery system may not reach the high quality levels found in the planned areas, but it is far more efficient and demand responsive'.[34] Two Turkish architects even go a step further in comparing standard-type social housing and informal housing in Istanbul. Using a number of parameters such

as architectural design, infrastructure and socio-cultural and environmental factors, the authors highlight the 'spatial richness and identity' of informal housing and suggest lessons to be learned for future social housing projects.[35] In a similar vein, Theresa Williamson's comparison of life in favelas and condominiums in Chapter 7 of this book challenges stereotypes around informality and questions the formal vs informal dichotomy.[36]

At least partly based on comparisons is also a thought-provoking essay by legal scholar Carmen Gonzales, which takes issue with De Soto's ideas. Sceptical of the claim that privatisation and the free market will solve the problem of the urban poor, she points to *colonias* in Texas and other US states. Gonzales considers these formally legal settlements with comparably low standards of living not an 'exotic transplant' from the South but a rational response to a shortage of affordable housing and inequality. With reference to a number of disadvantages of land-titling programmes in Colombia, Gonzales argues that it is not the legal title as such that matters most, but tenure security. She also argues that the neoliberal perspective overlooks other effective mechanisms, such as participation ('creativity of the poor'), social solidarity and active state intervention. In addition, Gonzales highlights two aspects of Latin American law that, in contrast to the Northern dogma of absolute property rights, benefit the poor. The Colombian constitution, for instance, recognises the right to dignified housing, to education, to health care and a healthy environment. Moreover, the 'social function doctrine' 'obligates landowners to use land in ways that are affirmatively beneficial to the community'.[37] Such a legal perspective is no doubt limited, because, in practice, many Colombians do not benefit from the law due to a lack of resources, poor implementation and great inequalities in wealth and land ownership. But even though her article is not entirely comparative, it exemplifies the potential of the comparative methodology to provide a thought-provoking impulse.

1.3 Triple case studies

Studies that draw conclusions from three case studies are as detailed as paired comparisons but allow for more complexity. A classic example of a triple case study is Anthony and Elizabeth Leeds' analysis of the political attitudes of squatters in Brazil, Chile and Peru. The authors use comparison to refute ethnocentric assumptions of Anglo–American scholars about supposedly apolitical inhabitants of informal settlements by examining

the interaction between squatters and the polity. They contrast Brazilian favelas (where individual channels of favours and exchanges of interest were much more important than political parties or unions) with Peruvian 'barriadas'. In the case of Peru, several factors – such as competing political actors (not unselfishly) mobilising and promoting squatters, a bureaucracy set up to deal with informal housing, and the presence of various non-governmental organisations (NGOs) – provided the option of flexible use of external connections. The authors note that these flexible patronal relationships facilitated the administrative and physical incorporation of informal settlements into the city in Peru. Conversely, the tight interlacing between political parties and squatters and the high degree of organisation into formal community associations provided inhabitants of Chilean informal settlements with fairly direct access to promotion and support, but in the long run these political affiliations proved to be vulnerable to political change such as Pinochet's putsch in 1973.[38]

Another comparative analysis of three locations examines policy responses to informal housing in Guangzhou (China), Mumbai (India) and Rio de Janeiro (Brazil). Assuming that policies are largely shaped by four factors (government relations on different levels, electoral politics, municipal finance and the capacity of civil society), sociologist Xuefei Ren assesses the entrepreneurial capacity of these local governments. In India, where local municipal power is minimal and civil rights are deeply entrenched, the authority has to rely on private capital to rehabilitate slum settlements and often combines responsibilities of slum-upgrading with rights of commercial development. This method is often ineffective, as self-interested developers tend to put minimal resources behind the upgrading project. In Guangzhou, by contrast, local municipal power is strong, and civil society weak. Here, the authority adopts a heavy-handed removal policy. This approach, however, is equally ineffective, in the sense of the high cost to the government of resettling the displaced households. The Brazilian model, however, allows a combination of slum regularisation and toleration. Local municipal power is moderate and civil society strong. The fight for votes makes toleration and rehabilitation the best choice for the state, especially prior to elections. Less pressure on balancing municipal revenue and expenditure makes the periodic lump sum required to make peace with the favela settlers an acceptable, and even effective, investment.[39]

Ren's study is also a good example that underlines the crucial importance of case selection for the outcomes of comparisons. If situations are very similar, one is likely to uncover only subtle nuances, such

as in the case of Andreas Suttner's study of squatters' role in the change from modern to postmodern urban policies in Berlin, Vienna and Zurich during the 1980s. In all three cities, squatters had a similar countercultural motivation and used independent media and militancy as means of mobilisation. The resulting conflicts with ruling political parties and the ways of dealing with squatting differed only slightly.[40]

1.4 Multi-case studies

Although grounded on a massive empirical basis, multi-case studies tend to be abstract, and generalisations are often limited by exceptions. A comparative macro-perspective can nevertheless produce fundamental insights and stimulate new research. Two multi-case studies on European squatting illustrate this.

In his 'configurational analysis' of squatted social centres in Europe, Cesar Guzman-Concha highlights three contextual factors – resources, grievances and political polarisation – whose interaction influences the strength of squatter movements. Two broad patterns emerge from the study, which includes 58 European cities. In some parts of Europe (mainly in the South), a combination of severe grievances, sufficient resources (such as large leftist communities) and closed or unresponsive institutions resulted in strong movements. In the European North, strong squatter movements emerged due to robust far-right parties, despite scarce resources and less grave social problems.[41]

Another multi-case study focuses on changes over time. Miguel A. Martínez López and Gianni Piazza analyse European squatting movements as part of international protest waves, and verify some degree of simultaneity, albeit the length of the cycles varies mainly due to internal factors (such as changes in the national law, urban mega-events or political change). In Southern Europe, exemplified by three Spanish cities and Rome, they detect the occurrence of three main 'cycle-stages' of squatting (always beginning earlier in Rome than in Spain). In Central/Northern Europe, by contrast, there were rather uneven developments in cities such as Berlin, Copenhagen and Paris.[42]

Sociologist Brian Aldrich provides a comparable macro-perspective on informal housing in Asia. His study compares the transformation of squatter settlements into formal housing in six metropolises. By the end of the Second World War, all megacities had a high proportion of squatter settlements, and oligarchs dominated local politics. But, whereas in Hong Kong, Singapore and Kuala Lumpur almost all dwellers of the

informal settlements had been rehoused, there were still large numbers of squatters in Bangkok, Djakarta and Manila. The author attributes the differences mainly to the degree of unity among the elite and the squatters' organisational mobilisation.[43] Other factors, such as the differences in the wealth of those cities, are neglected though, which confirms that this type of comparative research (asking why similar processes have different outcomes) requires comprehensive scrutiny of the respective contexts if it is to generate deep insights.

While these studies take the category of squatting for granted, another team of researchers uses the comparative approach to question the category of informality. The authors 'ask whether the shantytowns along the rail tracks in Kolkata, the relatively well organised self-constructed neighbourhoods in Mexico City, the consolidated and normalised 'post-gecekondu' … areas in Istanbul, the rich residential areas in Belgrade constructed during the transition period between the socialist and the neoliberal regime … or even China's urbanised villages should all be called "informal settlements", only because they fulfil certain aspects of informality in their production process'.[44] Informal housing appears in their discussion in two fundamentally different forms. Self-help housing with strong political organisation is subsumed under the rubric of 'popular urbanisation', while less participatory processes mainly dominated by market mechanisms and commercialisation are dubbed 'plotting urbanism'. The distinction is part of a typology of urbanisation processes.

The next section discusses a few typologies with a focus on informal housing only.

1.5 Typologies

Typologies systematise heterogeneity. They tend to emphasise differences and are, to some extent, an end in themselves. But typologies can also be used as a springboard for exploration and as an analytical tool.

One typology of informality, developed by geographer Richard Harris, is very comprehensive. Its aim is no less than the systematisation of the global diversity of informality (with a strong focus on informal housing). Harris distinguishes five different modes of informal urban development: latent (informality unregulated by the state); diffuse (individualised small-scale action); embedded (organised informality that remains quiet and rather covert); overt (organised informality that is visible); and dominant (where the informal practice is established as routine).[45]

Such a global typology is rather exceptional. Most typologies are more specific to a certain context. The result of inductive analysis of local diversity, they deepen the understanding of specifics of the region under study but their findings are not necessarily transferable to other parts of the world. An example from the Global North, Hans Pruijt's typology of West European squatting, illustrates this. He distinguishes five configurations based on their different goals: deprivation-based, entrepreneurial, conservational, political squatting (in the narrower sense) and squatting as a housing strategy.[46] By defining a set of possible configurations, the typology outlines the possibility space of squatting in the Global North. In practice, these configurations overlap, and are rarely present at the same time. This might be one reason why Pruijt's model has been referred to by quite a few scholars but has been rarely made productive as an analytical tool so far.[47]

Two typologies classify informal housing in the Balkans. Sasha Tsenkova, scholar of planning and international development, distinguishes four types: squatter settlements, settlements for refugees and vulnerable people, improved squatter settlements, and illegal suburban subdivisions. She finds that some are of relatively good quality, and only two can be classified as substandard.[48] Similarly, the four types that Suditu and Vâlceanu distinguish in their study point to a similar heterogeneity of informal housing in post-socialist Romania.[49]

While these typologies are developed to systematise existing knowledge, others have been used as starting point for further research. One example is a typology of informal tenure in Egypt developed by Ahmed Soliman. This expert on architectural engineering distinguishes three main types: 'semi-informal' (informal residential development on privately owned agricultural land), 'squatter settlements' (development on state-owned desert land) and 'ex-formal' (illegal construction or development on land whose ownership is in doubt). There are also 12 sub-types. This refined typology is being used to quantify the occurrence of these types in Cairo and Alexandria, providing a more precise understanding of the diversity of informal tenure in Egyptian cities.[50] In a related project, Ahmed Soliman and Hernando de Soto have used this typology to analyse the relationship between the housing delivery system and the economic, social and political conditions in Greater Cairo, Alexandria and Tanta.[51]

With reference to Soliman, Mike Davis has drafted a general typology of slums, which is, in his own words, 'an analytic simplification that abstracts from locally important features for the sake of global comparability'.[52] His candid self-criticism points to a fundamental problem of typologies: the more abstract they are, the bigger is the risk of imprecision.

Architect Nezar AlSayyad has used a typology to contrast the relationship between squatters and the state in Latin America and the Middle East.[53] He distinguishes four types of squatting: gradual (spontaneous and individual), communal (collective), mobilising (instigated by political groups) and generated (organised by authorities in return for electoral gain). Supported by examples from Colombia, Venezuela and Peru, AlSayyad suggests that squatting in Latin America, where squatters tend to associate their demands with certain political forces and form their own voice, is typically of a generated or mobilised type. By contrast, in the Middle East, squatting is a 'gradual, politically unobtrusive process' in which the state remains rather indifferent. Drawing examples from Egypt and Saudi Arabia, AlSayyad stresses that squatters take advantage of the opportunities on offer and invade unused land spontaneously. He attributes the different behaviour of squatters in Latin America and the Middle East to distinct political cultures – that is, to 'a broad system of values and norms that govern individual and collective conduct within the community and toward the state'.[54] The dichotomy he suggests is not unproblematic, though. Spontaneous land invasions are by no means a unique feature of squatting in the Middle East. And the degree of mobilisation of Latin American squatters varies widely. AlSayyad's comparative study brings to mind once again that emphasising contrasts bears the risk of overgeneralisation.

An example of a typology made productive for a multi-case analysis in the Global North has been provided by Robert Gonzàlez, Ibàn Díaz-Parra and Miguel A. Martínez López.[55] In a book chapter on squatted social centres (SCCs) in Europe, the authors postulate the existence of four configurations. They differentiate abolitionism (anti-capitalist motivation against property), communalism (creation of communal life), pragmatism (meeting urgent housing needs) and unitarianism (combination of all forms of squatting). Their analysis examines the changing occurrence of these configurations of SCC in nine European cities over several decades. The comparison reveals a diversity of dynamics. In some cities, such as Paris and Rome, the first SCCs were mainly concerned with housing and paved the way for radical political squatting. In other places, such as Madrid and Barcelona, SCCs were initially motivated mainly by anti-capitalism and the quest for alternative living; SCCs with the main goal of housing emerged only later. Moreover, the comparison confirms that different cycles of squatting can be associated with changes in the political context, and indicates a trend towards 'more hybrid or moderate forms of squatting over the decades'.[56]

In Chapter 3 of this volume, Aguilera and Smart develop a nuanced typology of different policies of toleration of informal housing around the globe. Their work is also both a result of thorough analysis of existing studies and a tool for further investigation.

The last example in this brief survey points to the great potential of typologies to open up new perspectives. Jason Jindrich's comparative study of historical informal housing in the US and informal housing in different locations in the Global South fascinatingly demonstrates how a typology can serve as a tool for comparison and both subvert conventional views *and* bridge the Global North–South divide.[57] Depending on the degree of tenure, Jindrich distinguishes five types of squatters (ranging from 'squatter-owner' with almost complete assurance of their tenure, to squatters experiencing short 'fugitive-tenure', with no aspirations of ownership). He then assigns examples from the South (mainly Latin America) and from the US to each tenure type. Even if one were to object that dimensions of squatting in nineteenth-century US and contemporary squatting in Latin America are incommensurable, anecdotal evidence no doubt challenges the dominant stereotype of the land-hungry squatter on the US frontier as well as De Soto's praise of US policies of preemption. Jindrich's examples illuminate manifold similarities between today's informal housing in the Global South and past squatting in the US. The historical comparison results in a relaxed and unagitated view on squatting. Jindrich questions the 'pathologizing of modern squatter colonies in the Global South' by highlighting the fact that initially squatted neighbourhoods in the US have 'become indistinguishable from the surrounding urban fabric'.[58]

1.6 Lessons?

At the heart of comparative inquiry there is a genuine curiosity about other cultures. At the same time, comparative research often questions the laws and institutions (and their related values and practices) at home. Comparisons tell us not only something new about another region but also about ourselves. More often than not, comparative research is motivated by the noble aim of drawing lessons from other experiences and to develop ideas for improvement. There is, however, a risk of overstepping the mark and/or remaining within the limitations of one's area of expertise. Take as examples Anders Corr's impressively knowledgeable book on squatting and rent strikes worldwide, which conceptualises informal housing/squatting predominantly as social protest, or Mike

Davis's somewhat apocalyptic but astute stocktaking of the global 'informal proletariat'.[59]

It might be promising to open up new perspectives by bringing '"Third World" questions to bear on "First World" processes', as Ananya Roy has suggested.[60] In this vein, Thomas Aguilera has emphasised the relative success of onsite interventions by NGOs in the Global South to advocate the normalising and regularising of slums as an alternative to removal and rehousing in Northern 'slums' (that is, migrant dwellings in Paris and Madrid).[61] So far, the North seems to be unwilling to learn from the South in this regard. Nevertheless, confronting a phenomenon with an equivalent in a different part of the world holds remarkable critical potential.

Even if not every idea falls on sympathetic ears, drawing lessons from experiences elsewhere is always worth a try. One differentiated example is a study by legal scholar Juanita Pienaar, who draws lessons from Latin America for informal housing in South Africa. For this, she follows a two-step approach beginning with a comparative exploration of informal housing in a few countries with generally similar situations but different policies. Starting off with an analysis of land-use planning in three Latin American countries and Zimbabwe, Pienaar singles out a number of problematic experiences, such as the overly complicated and expensive planning procedures in Peru, the lack of supervision in Mexico and the exclusion of informal institutions from planning processes in Zimbabwe. She attributes the failure of housing projects for the poor to the overlooking of factors such as location and urban accessibility. By contrast, she suggests drawing lessons from the Chilean planning approach, which offers flexible standards, public participation and promotion of mixed development, to reorganise and improve the South African planning system.[62]

Knowledge transfer often requires a reflected approach based on a critical review of existing terminology. As Rachelle Alterman and Inês Calor highlight in Chapter 8 of this volume, the informality concept of the Global South is not easily transferable to the North. Both authors discuss various challenges and constraints for knowledge transfer from the Global South to the North and suggest a differentiated approach. They argue that, in OECD (Organisation for Economic Co-operation and Development) countries, where actions in the built environment are regulated through a closely knit web of land, planning, housing, environmental and other laws, the concept of 'informality' must be trimmed down to a shape and size that can be accommodated within the rule of law.

Another kind of lesson is the type that historical actors learn from others. While practices around housing are enrooted in local contexts,

by their very nature, there is a certain exchange of ideas and practices, particularly in the Global North. Travelling squatters contribute to this exchange.[63] But perhaps even more important for cross-fertilisation is the media. As Bart van der Steen has shown, Dutch squatters provided a model for squatters in Germany and elsewhere during the 1970s and 1980s, but the idea of squatters from Amsterdam instigating riots in other cities is a myth. Rather, media played a crucial role in the dissemination of news.[64]

In this volume, two case studies explore the transfer of squatting practices within the context of the Global North. In Chapter 10, Iain McIntyre traces links between squatting actions in Australia and Great Britain immediately after the end of the Second World War. In Chapter 11, Jakob Warnecke analyses the appropriation of typically leftist squatting practices by right-wing activists in Germany during reunification and afterwards.

True comparative research is a big challenge, and, in this sense, this collection of comparative studies is just another attempt. As the focus of this book is on the method, it does not promote or defend any specific thesis or concept. Some authors here use the concept of informality as a heuristic category. Others turn to notions more suited to the respective context, such as squatting, illegal housing or self-help housing. In pursuit of a pragmatic approach, most chapters are more explorative than affirmative, and assume a critical stance.

The structure of the book follows a similar logic to that of this introduction. Chapters 1 and 2 set the scene. In Chapter 2, Alan Gilbert makes the case for comparative research, based on his experience in Latin America. Chapters 3–6 provide examples of paired comparisons, which highlight how versatile and productive this approach can be. The authors of Chapter 3 devise a typology of policies of toleration, based on a paired comparison of informal housing in Paris (which stands for the Global North) and Hong Kong (an example of the Global South). Chapter 4 compares urban squatting in an Eastern communist regime (GDR) and a Western democracy (the Netherlands), and challenges stereotypes about housing in a dictatorship and a democracy, respectively. Chapter 5 explores the uncharted territory of informal settlements in Kyrgyzstan and Kazakhstan. The authors of Chapter 6 introduce a rather unconventional angle by comparing squatting movement structures in Spain and Brazil (instead of focusing on favelas). Chapters 7 and 8 problematise the notion of informal housing from two different angles. While Chapter 7 engages in a critical discussion of formal and informal housing (with a focus on housing in Rio de Janeiro), Chapter 8 explores the intricacies

and pitfalls that the use of the notion of 'informal housing' entails in the Global North, with a particular emphasis on consequences for urban planning and judicature. This chapter and Chapter 9, which offers a historical comparison of urban slums in nineteenth-century Europe and shanty towns in Africa today, both use comparisons predominantly to discuss possible lessons for policymakers. Chapters 10 and 11, by contrast, explore lessons historical actors have learned. The author of Chapter 10 examines links between post-war squatting in Britain and Australia, while Chapter 11 analyses the adoption of traditionally leftist squatting practices by the radical right in Germany.

Many arguments can be raised against comparison. Apart from technical obstacles, such as language barriers, geographical distances and work in teams, several factors impede global comparisons. The physical appearance, the persistence and the scale of informal housing differ greatly from one place to another. The reactions of the authorities are divergent as well. Southern policymakers consider informal housing a permanent *economic* problem, whereas authorities in the North treat squatting as a transitory *political* problem. Different property regimes add to the complexity.

Moreover, the variety of notions for housing strategies that do not (entirely) comply with the law testify to the diversity of the topic. Apart from informal housing, squatting and illegal housing (which are the main terms used in this volume), there are many other concepts, such as unauthorised housing, unlicensed housing, self-help housing and auto-construction, to name just a few. Some can be used interchangeably, and others cannot.

Notwithstanding the many obstacles, Thomas Aguilera and Alan Smart have suggested 'developing a more systematic comparative analysis' of informal housing around the globe, for instance, 'by compiling well-documented regional studies and subjecting them to rigorous comparison'.[65] This book takes their appeal to heart.

Notes

1. In this book, the notion of informality is used pragmatically as a heuristic category.
2. Jennifer Robinson, 'Comparative Urbanism: New Geographies and Cultures of Theorizing the Urban', *International Journal of Urban and Regional Research* 40, no. 1 (2016): 187–99.
3. Jennifer Robinson, 'Cities in a World of Cities: The Comparative Gesture', *International Journal of Urban and Regional Research* 35, no. 1 (2011): 1–23.
4. Colin McFarlane and Jennifer Robinson, 'Introduction: Experiments in Comparative Urbanism', *Urban Geography* 33, no. 6 (2012): 767.
5. More on Gilbert's comparative work in Chapter 2 of this volume.

6. Alan Gilbert, 'Pirates and Invaders: Land Acquisition in Urban Colombia and Venezuela', *World Development* 9, no. 7 (1981): 657–78.
7. The paired comparison was part of a bigger comparative project, which included also Mexico City. See Alan Gilbert and Peter M. Ward, *Housing, the State and the Poor: Policy and Practice in Three Latin American Cities* (Cambridge: Cambridge University Press, 1985). Valencia and Mexico are, apart from the fact that informal housing is more dominant in Mexico, quite similar regarding easy access to informal housing, availability of resources, leverage of squatters and indifferent state policies.
8. Roger Few, Nelson Gouveia, Angela Mathee, Trudy Harpham, Amelia Cohn, André Swart and Nancy Coulson, 'Informal Sub-Division of Residential and Commercial Buildings in São Paulo and Johannesburg: Living Conditions and Policy Implications', *Habitat International* 28, no. 3 (2004): 427–42.
9. Shihabuddin Mahmud and Umut Duyar-Kienast, 'Spontaneous Settlements in Turkey and Bangladesh: Preconditions of Emergence and Environmental Quality of Gecekondu Settlements and Bustees', *Cities* 18, no. 4 (2001): 278.
10. In the terminology of Schmid et al., this study epitomises the difference between popular urbanisation and plotting urbanism. Christian Schmid, Ozan Karaman, Naomi C. Hanakata, Pascal Kallenberger, Anne Kockelkorn, Lindsay Sawyer, Monika Streule and Kit Ping Wong, 'Towards a New Vocabulary of Urbanisation Processes: A Comparative Approach', *Urban Studies* 55, no. 1 (2018): 19–52.
11. Amanda S.A. Dias, *Aux marges de la ville et de l'état. Camps Palestiniens au Liban et favelas cariocas* (Paris: Karthala-IFPO, 2013); see also Silvia Pasquetti and Giovanni Picker, 'Urban Informality and Confinement: Toward a Relational Framework', *International Sociology* 32, no. 4 (2017): 532–44.
12. In a theory-led approach, expert in housing law Jane Ball seeks to apply the insider–outsider theory to squatting in France and the UK. Jane Ball, 'From Individual to Collective Squat: Economic Theory and the Regulation of Squatting in England and France', in *Contemporary Housing Issues in a Globalized World*, ed. Padraic Kenna (Farnham: Ashgate Publishing, 2014), 227–50.
13. Hans Pruijt, 'Is the Institutionalization of Urban Movements Inevitable? A Comparison of the Opportunities for Sustained Squatting in New York City and Amsterdam', *International Journal of Urban and Regional Research* 27, no. 1 (2003): 133–57.
14. Hans Pruijt, 'Is the Institutionalization of Urban Movements Inevitable? A Comparison of the Opportunities for Sustained Squatting in New York City and Amsterdam', *International Journal of Urban and Regional Research* 27, no. 1 (2003): 153.
15. Hans Pruijt, 'Is the Institutionalization of Urban Movements Inevitable? A Comparison of the Opportunities for Sustained Squatting in New York City and Amsterdam', *International Journal of Urban and Regional Research* 27, no. 1 (2003): 139.
16. Instead of identifying mainly as a housing movement, they considered squatting an end in itself, too. Pruijt explained the 'anomaly' as a result of global exchange of knowledge, as several Europeans had influenced New York's squatter scene, leading to a different self-understanding of squatters in the 1980s. See also Linus Owens, Ask Katzeff, Elisabeth Lorenzi and Baptiste Colin, 'At Home in the Movement: Constructing an Oppositional Identity through Activist Travel across European Squats', in *Understanding European Movements: New Social Movements, Global Justice Struggles, Anti-Austerity Protests*, ed. Cristina Flesher Fominaya and Laurence Cox (London: Routledge, 2013), 172–86.
17. Hans Pruijt, 'Is the Institutionalization of Urban Movements Inevitable? A Comparison of the Opportunities for Sustained Squatting in New York City and Amsterdam', *International Journal of Urban and Regional Research* 27, no. 1 (2003): 151.
18. Justus Uitermark, 'The Co-Optation of Squatters in Amsterdam and the Emergence of a Movement Meritocracy: A Critical Reply to Pruijt', *International Journal of Urban and Regional Research* 28, no. 3 (2004): 687–98; Hans Pruijt, 'Squatters in the Creative City: Rejoinder to Justus Uitermark', *International Journal of Urban and Regional Research* 28, no. 3 (2004):, 704.
19. Hans Pruijt, 'The Power of the Magic Key: The Scalability of Squatting in the Netherlands and the United States', in *The Squatters' Movement in Europe: Commons and Autonomy as Alternatives to Capitalism*, ed. Claudio Cattaneo and Miguel A. Martínez (London: Pluto Press, 2014), 110–35.
20. Hans Pruijt and Conny Roggeband, 'Autonomous and/or Institutionalized Social Movements? Conceptual Clarification and Illustrative Cases', *International Journal of Comparative Sociology* 55, no. 2 (2014): 144–65.

21. Miguel A. Martínez, Azozomox and Javier Gil, 'Unavoidable Dilemmas: Squatters Dealing with the Law', in *The Squatters' Movement in Europe: Commons and Autonomy as Alternatives to Capitalism*, ed. Claudio Cattaneo and Miguel A. Martínez (London: Pluto Press, 2014), 211–36.
22. Deanna Dadusc and E.T.C. Dee, 'The Criminalisation of Squatting: Discourses, Moral Panics and Resistances in the Netherlands and England and Wales', in *Moral Rhetoric and the Criminalisation of Squatting: Vulnerable Demons?*, ed. Lorna Fox O'Mahony et al. (London: Routledge, 2015), 109–32.
23. Peter Angus Mitchell, 'Contested Space: The History of Squatting in Divided Berlin c.1970–c.1990' (PhD thesis, University of Edinburgh, 2015), 316.
24. D.J. Dwyer, 'The Problem of In-Migration and Squatter Settlement in Asian Cities: Two Case Studies, Manila and Victoria-Kowloon', *Asian Studies* 2 (1964): 145–69.
25. Davison Muchadenyika and Jeremy Waiswa, 'Policy, Politics and Leadership in Slum Upgrading: A Comparative Analysis of Harare and Kampala', in *Cities* 82 (2018): 58–67.
26. Inês Calor and Rachelle Alterman, 'When Enforcement Fails: Comparative Analysis of the Legal and Planning Responses to Non-Compliant Development in Two Advanced-Economy Countries', *International Journal of Law in the Built Environment* 9, no. 3 (2017): 207–39.
27. Alina Tanasescu, Ernest Chui Wing-tak and Alan Smart, 'Tops and Bottoms: State Tolerance of Illegal Housing in Hong Kong and Calgary', *Habitat International* 34, no. 4 (2010): 478–84.
28. Jovana Dikovic, 'Squatting', in *The Global Encyclopaedia of Informality: Understanding Social and Cultural Complexity, Volume 2*, ed. Alena Ledeneva (London: UCL Press, 2018), 10–13.
29. Jessica Intrator, 'From Squatter to Settler: Applying the Lessons of Nineteenth Century US Public Land Policy to Twenty-First Century Land Struggles in Brazil', *Ecology Law Quarterly* 38, no. 1 (2011): 179–232.
30. Hernando de Soto, *The Mystery of Capital: Why Capitalism Triumphs in the West and Fails Everywhere Else* (New York: Basic Books, 2000). For the debate, see Chapter 2 of this volume.
31. Sebastian Galiani and Ernesto Schargrodsky, 'Property Rights for the Poor: Effects of Land Titling', *Journal of Public Economics* 94, no. 9/10 (2010): 712.
32. Another example of a comparison testing De Soto's ideas is a study of two informal settlements in Puerto Rico and Venezuela. It reveals no significant differences between the two places. Both settlements present no positive relationship between the improvement of dwellings and status of land tenure. However, the comparison supports an observation made earlier that 'perceived' land tenure is much more important than the formal status. Jean M. Caldieron, 'Land Tenure and the Self-Improvement of Two Latin American Informal Settlements in Puerto Rico and Venezuela', *Urban Forum* 24, no. 1 (2013): 49–64.
33. Rodrigo Salcedo, 'The Last Slum: Moving from Illegal Settlements to Subsidized Home Ownership in Chile', *Urban Affairs Review* 46, no. 1 (2010): 112f.
34. David E. Dowall, 'Comparing Karachi's Informal and Formal Housing Delivery Systems', *Cities* 8, no. 3 (1991): 227.
35. Aylin Akçabozan and Yüksel Demir, 'A Comparative Parametric Evaluation of Informal and Formal Housing: Maltepe/Istanbul Case Study', *Architecture and Urban Planning* 10 (2015): 21–6. At times, comparison of formal and informal housing can result in counter-intuitive results. A comparative study in Johannesburg (South Africa) found people living in informal housing in relatively good health, demonstrating that there is a complex relationship between housing and health. The explanation provided by the authors is that migrants in the area under study were younger and healthier than their local counterparts. Thea de Wet, Sophie Plagerson, Trudy Harpham and Angela Mathee, 'Poor Housing, Good Health: A Comparison of Formal and Informal Housing in Johannesburg, South Africa', *International Journal of Public Health* 56, no. 6 (2011): 625–33.
36. See also Robert E. Snyder, Guillermo Jaimes, Lee W. Riley, Eduardo Faerstein and Jason Corburn, 'A Comparison of Social and Spatial Determinants of Health between Formal and Informal Settlements in a Large Metropolitan Setting in Brazil', *Journal of Urban Health: Bulletin of the New York Academy of Medicine* 91, no. 3 (2014): 432–45. Another example: Ranvinder Singh Sandhu, 'Not All Slums Are Alike: A Comparison of Squatter Housing in Delhi and Amritsar', *Environment and Behavior* 19, no. 3 (1987): 398–406.
37. Carmen Gonzales, 'Squatters, Pirates, and Entrepreneurs: Is Informality the Solution to the Urban Housing Crisis?', *University of Miami Inter-American Law Review* 40, no. 2 (2009): 256.
38. Anthony Leeds and Elizabeth Leeds, 'Accounting for Behavioral Differences: Three Political Systems and the Responses of Squatters in Brazil, Peru, and Chile', in *The City in Comparative Perspective: Cross-National Research and New Directions in Theory*, ed. John Walton and Louis H. Masotti (New York: SAGE Publications, 1976), 193–248.

39. Xuefei Ren, 'Governing the Informal: Housing Policies over Informal Settlements in China, India, and Brazil', *Housing Policy Debate* 28, no. 1 (2018): 79–93.
40. Andreas Suttner, *"Beton brennt": Hausbesetzer und Selbstverwaltung im Berlin, Wien und Zürich der 80er* (Vienna: Lit Verlag, 2011).
41. Cesar Guzman-Concha, 'Radical Social Movements in Western Europe: A Configurational Analysis', *Social Movement Studies* 14, no. 6 (2015): 668–91. See also Cesar Guzman-Concha, 'Explaining Differences in the Strength of Squatters' Movements in Western European Cities: A Comparative Analysis', *Acta Sociologica* 58, no. 3 (2015): 195–213.
42. Gianni Piazza and Miguel A. Martínez López, 'More than Four Decades of Squatting: Cycles, Waves and Stages of Autonomous Urban Politics in European Cities', in *The Urban Politics of Squatters' Movements*, ed. Miguel A. Martínez López (New York: Palgrave Macmillan, 2018), 229–45. Unfortunately, the survey excludes London and Amsterdam, which limits its significance. But it includes two cities in the shadow of these metropolises that do not fit in any pattern: Brighton and Rotterdam.
43. Brian C. Aldrich, 'Winning Their Place in the City: Squatters in Southeast Asian Cities', *Habitat International* 53 (2016): 495–501.
44. Christian Schmid, Ozan Karaman, Naomi C. Hanakata, Pascal Kallenberger, Anne Kockelkorn, Lindsay Sawyer, Monika Streule and Kit Ping Wong, 'Towards a New Vocabulary of Urbanisation Processes: A Comparative Approach', *Urban Studies* 55, no. 1 (2018): 19–52.
45. Richard Harris, 'Modes of Informal Urban Development: A Global Phenomenon', *Journal of Planning Literature* 33, no. 3 (2018): 267–86.
46. Hans Pruijt, 'The Logic of Urban Squatting', *International Journal of Urban and Regional Research* 37, no. 1 (2013): 19–45.
47. Moreover, some types are disputed, particularly the notion of political squatting.
48. Sasha Tsenkova, 'Informal Settlements in Post-Communist Cities: Diversity Factors and Patterns', *Urbani izziv* 21, no. 2 (2010): 73–84.
49. Bogdan Suditu and Daniel-Gabriel Vâlceanu, 'Informal Settlements and Squatting in Romania: Socio-Spatial Patterns and Typologies', *Human Geographies* 7, no. 2 (2013): 65–75.
50. Ahmed M. Soliman, 'Typology of Informal Housing in Egyptian Cities: Taking Account of Diversity', *International Development Planning Review* 24, no. 2 (2002): 177–201.
51. Ahmed M. Soliman and Hernando de Soto, *A Possible Way Out: Formalizing Housing Informality in Egyptian Cities* (Lanham, MD: University Press of America, 2004).
52. Mike Davis, *Planet of Slums* (London/New York: Verso, 2006), 30.
53. Nezar AlSayyad, 'Squatting and Culture: A Comparative Analysis of Informal Developments in Latin America and the Middle East', *Habitat International* 17, no. 1 (1993): 33–44; also published as 'Informal Housing in a Comparative Perspective: On Squatting, Culture, and Development in a Latin American and a Middle Eastern Context', *Review of Urban and Regional Development Studies* 5, no. 1 (1993): 3–18.
54. Quotes in Nezar Alsayyad, 'Squatting and Culture: A Comparative Analysis of Informal Developments in Latin America and the Middle East', *Habitat International* 17, no. 1 (1993): 41.
55. Robert Gonzàlez, Ibán Díaz-Parra and Miguel A. Martínez López, 'Squatted Social Centres and the Housing Question', in *The Urban Politics of Squatters' Movements*, ed. Miguel A. Martínez López (New York: Palgrave Macmillan, 2018), 271–88.
56. Robert Gonzàlez, Ibán Díaz-Parra and Miguel A. Martínez López, 'Squatted Social Centres and the Housing Question', in *The Urban Politics of Squatters' Movements*, ed. Miguel A. Martínez López (New York: Palgrave Macmillan, 2018), 287.
57. Different from Jeff D. Peterson, 'Squatters in the United States and Latin America: The Discourse of Community Development', *Community Development Journal* 26, no. 1 (1991): 28–34.
58. Jason Jindrich, 'Squatting in the US: What Historians Can Learn from Developing Countries', in *Public Goods versus Economic Interests: Global Perspectives on the History of Squatting*, ed. Freia Anders and Alexander Sedlmaier (New York: Routledge, 2017), 72.
59. Anders Corr, *No Trespassing! Squatting, Rent Strikes, and Land Struggles Worldwide* (Cambridge, MA: South End Press, 1999); Mike Davis, *Planet of Slums* (London/New York: Verso, 2006).
60. Ananya Roy, 'Paradigms of Propertied Citizenship: Transnational Techniques of Analysis', *Urban Affairs Review* 38, no. 4 (2003): 465.
61. Thomas Aguilera, 'Normalizing and Regularizing Slums: What Explains the Sidelining of Onsite Interventions in Europe? Comparing Paris and Madrid', in *Rethinking Precarious Neighborhoods*, ed. Agnès Deboulet (Paris: Agence française de développement, 2016), 161–76.

62. Juanita Pienaar, 'Planning, Informal Settlement and Housing in South Africa: The Development Facilitation Act in View of Latin American and African Developments', *Comparative and International Law Journal of Southern Africa* 35, no. 1 (2002): 1–25.
63. Lynn Owens, 'Have Squat, Will Travel: How Squatter Mobility Mobilizes Squatting', in *Squatting in Europe: Radical Spaces, Urban Struggles*, ed. Squatting Europe Kollective (Wivenhoe: Minor Compositions, 2013), 185–207.
64. Bart van der Steen, 'Die internationalen Verbindungen der Hausbesetzerbewegung in den 70er und 80er Jahren', in *Deutsche Zeitgeschichte – transnational*, ed. Alexander Gallus et al. (Göttingen: Wallstein Verlag, 2015), 203–20.
65. One might even contrast a radical Northern rhetoric and a radical Southern practice. Thomas Aguilera and Alan Smart, 'Squatting, North, South and Turnabout: A Dialogue Comparing Illegal Housing Research', in *Public Goods versus Economic Interests: Global Perspectives on the History of Squatting*, ed. Freia Anders and Alexander Sedlmaier (New York: Routledge, 2017), 42.