

Housing Segregation and Discrimination: A Comparative Analysis of Nigeria, the United States, and the United Kingdom

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This paper offers a comparative analysis of housing segregation and discrimination in Nigeria, the United States, and the United Kingdom, examining their historical roots, structural mechanisms, and contemporary forms. While the United States and the United Kingdom have well-documented histories of government-sponsored housing discrimination against Black populations and minorities—such as redlining, racial covenants, and exclusionary zoning—Nigeria's residential segregation stems from British colonial urban planning, which established Government Reserved Areas (GRAs) to separate European officials from local populations. Drawing on archival research, scholarly literature, and case studies, this analysis shows that, despite differing racial dynamics and political contexts, all three countries implemented policies that institutionalised spatial inequality based on race, class, and colonial status. The paper also examines how contemporary Nigerian estate developers reinforce these patterns through exclusive gated communities, discriminatory marketing, and the preservation of colonial-era spatial hierarchies. It contends that addressing housing inequality requires tackling both historical legacies and current industry practices.

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Background to the Study

Across Nigerian urban centres—especially state capitals and former colonial towns—a clear spatial divide shapes the built environment. The homes of senior government officials, wealthy residents, and expatriates are located in well-planned cadastral zones with paved roads, drainage, street lighting, piped water, electricity, and organised waste collection. By contrast, most urban residents live in areas that have developed organically, without formal planning, and are characterised by poor-quality housing and inadequate infrastructure (Ahmed & Ayoola, 2024; Rivera-Williams, 2025). This pattern mirrors the housing discrimination and segregation experienced by Black populations and other minorities in the United States and the United Kingdom.

This paper compares housing segregation across three countries, examining its historical roots, policy tools, and current forms — including the overlooked role of private estate developers in perpetuating segregation in Nigeria. The main point is that, despite differences in racial dynamics and political contexts, Nigeria, the United States, and the United Kingdom have all created institutional systems that produce and sustain housing segregation based on race, class, and social status. In Nigeria, this pattern stems directly from British colonial urban planning policies (Alozie, 2020; Nasidi, 2024); in the United States, federal and local housing policies — especially redlining — systematically excluded Black Americans from homeownership and wealth accumulation (Rothstein, 2017); in the United Kingdom, racialised housing discrimination, though less formalised, has caused ongoing residential segregation affecting Black and Asian communities (Simpson, 2020).

This comparative approach strengthens the existing literature on global housing inequality by showing how colonial legacies, government policies, and private-sector actors collaborate to create spatial divisions that transcend national borders. The paper begins by analysing the historical roots of housing segregation in each country, then reviews current trends, and concludes with policy recommendations to address the root causes of housing discrimination.

Historical Foundations of Housing Segregation

Nigeria: Colonial Origins of Spatial Division

The roots of housing segregation in Nigeria can be traced to British colonial urban planning between 1899 and 1919. Contrary to the belief that residential racial separation was confined to settler colonies, the Nigerian example shows that officially sanctioned segregation policies were enforced across the entire colonial empire (Alozie, 2020). These policies were justified on public health and sanitation grounds, but the real motive was to establish racial dominance and imperial control (Nasidi, 2024).

The creation of Government Reserved Areas (GRAs) was the primary means by which colonial authorities practised spatial segregation. Following the colonial conquest and the implementation of new town planning policies in 1903, British authorities introduced a grid pattern of settlement alongside Nigeria's existing indigenous urban layouts. This led to the

passage of the British Township and Public Health Ordinances of 1917, the Housing and Town Planning Acts of 1909, and the Town and Country Planning Ordinance of 1946—legislation aimed not only at enforcing Western architectural standards but also at segregating indigenous populations through land-use classifications, population density, and social status (Alozie, 2020; Nasidi, 2024).

Kano exemplifies this colonial transformation. Hausa land traditionally featured architectural styles and radial settlement patterns; however, British colonial rulers systematically introduced European designs and separated residential areas, creating a dual-city structure that distinguished indigenous groups from colonial officials (Nasidi, 2024). This pattern was replicated across Nigeria's state capitals and colonial towns, establishing a spatial hierarchy that continues to shape contemporary urban layouts.

The United States: Redlining and Institutionalised Discrimination

The United States established a separate yet parallel system of housing discrimination, deliberately designed to prevent Black Americans from owning homes and building wealth. The most notorious method was redlining—a practice in which banks, insurers, and federal agencies refused or limited loans and mortgages in certain areas, particularly in predominantly Black neighbourhoods (Rothstein, 2017). The term “redlining” derives from the practices of the Home Owners' Loan Corporation (HOLC) in the 1930s. HOLC surveyors assessed 293 American cities and created a colour-coded system to rate neighbourhoods: green (“best”), blue (“still desirable”), yellow (“definitely declining”), and red (“hazardous”) (Rothstein, 2017). Redlined areas were almost exclusively neighbourhoods with Black residents, as well as Catholic, Jewish, Asian, and Southern European immigrant communities, all deemed “undesirable” by the predominantly white real estate industry.

The consequences were severe: loans in redlined areas were either unavailable or available only at high interest rates, making homeownership nearly impossible for low-income minorities. Because property ownership is the primary way wealth is passed down across generations in American society, this systemic exclusion has perpetuated the racial wealth gap (Powell, 2018). Current data show the lasting effects: white families have almost ten times the net worth of Black families and more than eight times that of Hispanic families. Nearly one in five Black families has zero or negative net worth—twice the rate of white families. The Fair Housing Act of 1968 officially banned redlining and other discriminatory housing practices (Massey & Denton, 1993). However, the legacy of redlining still shapes patterns of wealth, health, and opportunity in American cities today. Research shows a clear link between historically redlined communities and current economic struggles, health disparities, and educational inequalities. The practice created what scholars call a “stigma” attached to formerly redlined neighbourhoods, sustaining cycles of disinvestment and marginalisation that persist for decades (Popkin, 2013).

The United Kingdom: Racialised Inequality in Social and Private Housing

The United Kingdom's experience with housing discrimination, although distinct from the

American pattern, reveals similar mechanisms of racialised spatial exclusion. Civil rights laws in Britain, grounded in the equity principles of English Common Law, often fail to recognise discrimination as a broad structural force, including the economic interests of property industries, that have sustained social segregation (McKay, 1977). The concept of redlining has been used by British scholars to understand racialised inequality in British cities. Simpson (2020) argues that “redlining” of urban space—originally conceptualised in the American context—demonstrates that racialised exclusion operated not only during the neoliberal era but also under post-war social democracy. Although Britain never adopted explicit federal redlining policies, similar exclusionary mechanisms operated through local authority housing allocation, mortgage lending practices, and estate agent discrimination.

The connection between race and public-sector housing has been less politicised in the United Kingdom than in the United States, partly because Britain's Black population has historically been less visible and had fewer political resources than American minorities (McKay, 1977). Without the concentrated ghetto conditions typical of American cities, awareness of housing discrimination among local government officials and national elites has remained lower than in the United States. However, research shows ongoing discrimination against Black and Asian applicants in both the private rental and social housing sectors (London School of Economics and Political Science, 2017).

The experiences of Caribbean immigrants in Britain highlight the challenges minority groups face. Following the Windrush migration, Caribbean communities struggled to access credit, mortgages, and housing loans from mainstream banks. In response, they developed alternative systems such as the “pardner” scheme—a rotating savings and credit association in which members contribute fixed amounts to a central fund and take turns receiving a “draw” (Monzo, 2020). Known by different names across Caribbean communities ('pardner' in Jamaica, 'sou-sou' in Grenada), this system demonstrates a creative way they addressed exclusion from formal financial and housing markets.

The Role of Estate Developers in Reinforcing Housing Discrimination in Nigeria

While colonial policies laid the groundwork for spatial segregation in Nigeria, contemporary private estate developers have become major drivers of these discriminatory patterns. Rather than addressing past inequalities, many developers actively reinforce them through exclusive gated communities, discriminatory marketing and pricing, and the perpetuation of colonial-era spatial hierarchies (Akinwumi & Ogunba, 2021; Ibem & Aduwo, 2013).

Exclusive Gated Communities as Tools of Exclusion

The spread of gated communities across Nigerian cities clearly demonstrates how estate developers reinforce segregation. These developers market these neighbourhoods as “secured,” “prestigious,” and “elite” housing areas, primarily targeting high-income earners and expatriates (Jiboye, 2014). Typically built on the outskirts of cities, these communities further divide urban space and separate wealthy residents from lower-income groups. In Lagos, for instance, developments such as Lekki's gated estates—Victoria Garden City and

Northern Foreshore Estate—are physically separated by walls, gates, and private security, creating what scholars call “fortified enclaves” (Adetokunbo, 2018). Such developments not only exclude low-income households but also reinforce the colonial GRA logic: a well-serviced, planned zone reserved for the elite, surrounded by unplanned, under-serviced neighbourhoods. By restricting access through high entry prices and membership requirements, developers institutionalise class-based segregation (Agbola & Agunbiade, 2009).

Discriminatory Marketing and Pricing Strategies

Estate developers in Nigeria often employ marketing tactics that subtly or overtly discourage non-elite, non-expatriate buyers. Luxury estate advertisements frequently feature predominantly foreign or light-skinned residents, reinforcing the colonial link between a “European” (or foreign) presence and high-quality living (Amao, 2012). Some developers require prospective buyers to provide proof of employment with multinational companies or to be “sponsored” by current residents—echoing colonial-era “expatriate-only” policies (Ogunba & Ajayi, 2021). Pricing strategies reinforce segregation. Many exclusive estates are priced in dollars rather than naira, explicitly targeting expatriates and wealthy Nigerians with foreign income (Akinwumi & Ogunba, 2021). This dollarisation signals that these properties are primarily aimed at international or elite buyers, effectively excluding middle- and low-income Nigerians.

Collaboration with Government and Public Institutions

Property developers often partner with state governments to acquire large land parcels for “new towns” or “city extensions,” which are then developed into upscale residential neighbourhoods. These partnerships frequently displace informal settlements and exacerbate spatial inequality (Ibem & Aduwo, 2013). For example, the Eko Atlantic project in Lagos—a major public-private partnership—has been criticised for prioritising luxury real estate for the wealthy while neglecting the housing needs of the city's majority population (Gandy, 2006).

Normalisation of Segregation through Industry Standards

The real estate industry in Nigeria has normalised segregation to the point that it is rarely questioned as a development model. Professional bodies such as the Nigerian Institution of Estate Surveyors and Valuers have been criticised for failing to take strong stands against discriminatory practices (Akinwumi & Ogunba, 2021). As a result, developers view gated communities, exclusive zoning, and class-based segregation as simply “good business” rather than as contributors to social inequality.

Contemporary Manifestations of Housing Segregation

Nigeria: Persistent Colonial Hierarchies

Contemporary Nigerian cities continue to reflect the spatial hierarchies established during the colonial period. Residential segregation remains shaped by socioeconomic disparities, religious and ethnic diversity, land-use policies, and the legacy of colonial planning (Ahmed & Ayoola, 2024). Rapid urban growth exacerbates these patterns, intensifying segregation

where infrastructure is inadequate and affordable housing is scarce (Rivera-Williams, 2025). GRAs remain exclusive enclaves for the political and economic elite, preserving their status as well-planned cadastral zones with comprehensive infrastructure. By contrast, most urban residents live in unplanned areas that lack basic services (Jiboye, 2014). Expatriate housing markets further reinforce segregation: multinational corporations often house foreign staff in exclusive compounds with amenities such as swimming pools and extensive security (Ogunba & Ajayi, 2021).

The United States: Persistent Discrimination and Wealth Disparities

Despite decades of civil rights legislation, housing discrimination persists in the United States. Experimental studies show that African American and Hispanic applicants continue to face discrimination in the rental and sales markets (Turner et al., 2013). Research on price discrimination indicates that white and Hispanic sellers discriminate against Black and Asian buyers, particularly in non-majority-Black neighbourhoods (Bayer et al., 2012). The racial wealth gap—where white families have nearly ten times the net worth of Black families—is directly linked to historic and ongoing housing discrimination (Shapiro et al., 2013). Contemporary research also documents discrimination against Muslim applicants in American rental markets, with evidence that Muslim applicants are less likely to receive a callback than upper-caste Hindu applicants (Datta et al., 2023).

The United Kingdom: Discrimination and Alternative Systems

In the United States, research has highlighted ongoing obstacles faced by minority groups. Studies of rental markets show that women from ethnic minority groups experience landlord discrimination, and that this discrimination is more frequent in higher-income areas (Drydakis, 2007). The 'pardner' scheme remains a key community-based response to exclusion from mainstream housing finance (Monzo, 2020).

Comparative Analysis: Convergent Patterns and Divergent Mechanisms

Comparing housing segregation across Nigeria, the United States, and the United Kingdom reveals both common patterns and distinct underlying causes. All three countries have established institutional systems that produce spatial inequality along racial, ethnic, and social-class lines. However, their historical trajectories, policy approaches, and current dynamics differ markedly. Colonial Inheritance: Nigeria's housing segregation stems directly from British colonial urban planning. The GRA system created a spatial pattern that postcolonial governments and developers have continued to reproduce, often without explicit racial intent but with outcomes that maintain inequality between elites and non-elites (Alozie, 2020; Nasidi, 2024). This pattern illustrates what scholars of colonialism describe as the enduring influence of colonial urban designs beyond the end of colonial rule. In the UK itself, colonial ideas also influenced housing policies, though with less obvious spatial separation in the metropolis (McKay, 1977).

Racialised State Policy: The United States established the clearest system of government-supported housing discrimination through federal redlining policies, racial covenants, and

exclusionary zoning (Rothstein, 2017). These policies were implemented with explicit racial intent and have created lasting patterns of segregation, even after civil rights laws were enacted. The American example shows how government policies can systematically exclude racial minorities from housing markets and from opportunities to build wealth (Monzo, 2020). Implied Discrimination: The United Kingdom's pattern of housing discrimination has been less explicitly codified than in the United States, yet it is equally effective in creating racialised spatial inequality. British anti-discrimination law, rooted in the equity principles of English Common Law, tends to focus on individual violations rather than on structural forces (Simpson, 2020). This legal approach frames housing discrimination as an individual rather than a societal issue, thereby hindering the development of comprehensive policy solutions.

Economic Dimensions: Across all three nations, housing segregation intersects with economic inequality, deepening disadvantage. In Nigeria, rapid urbanisation and a lack of affordable housing exacerbate segregation, pushing low-income populations into unplanned settlements lacking basic infrastructure (Ahmed & Ayoola, 2004). In the United States, the racial wealth gap sustains housing inequality across generations, often excluding Black families from homeownership and other wealth-building opportunities (Monzo, 2020). In the United Kingdom, discrimination in the private and social housing sectors limits housing options for minority households and results in areas of concentrated disadvantage. **Role of Private Developers:** Nigeria presents a unique case in which private estate developers have become the primary agents of segregation, building on colonial foundations yet operating through market forces rather than explicit government policy (Akinwumi & Ogunba, 2021; Ibem & Aduwo, 2013). In the United States and the United Kingdom, developers and real estate agents historically played similar roles, but recent fair housing laws provide imperfect regulatory frameworks.

Conclusion

The current comparative analysis examines housing segregation and discrimination in Nigeria, the United States of America, and the United Kingdom. In particular, the study focuses on the mechanisms that contributed to the emergence of housing segregation in these countries, including government policies and estate developers' involvement in Nigeria. Hence, the purpose of this paper is to analyse the history of housing discrimination and its modern forms in these nations and to reveal their common features.

Key Findings

The analysis reveals that all three countries have created systems of housing segregation; however, these systems emerged through different mechanisms. The colonial practice of establishing government-reserved areas was replicated in Nigeria through the development of gated communities, often at high prices. As a result, the developers of such houses contribute to housing segregation and discrimination in the country. Similarly, discriminatory laws and practices in the United States of America, namely redlining and racial covenants, created significant obstacles to Black Americans' access to homeownership. However, these practices do not apply in the UK. Nonetheless, racial discrimination and housing segregation persist within the private housing market and the social housing sector in this country.

Contributions to Knowledge

Three main contributions to the field may be identified in this study. First, the analysis expands existing knowledge of housing discrimination by including private estate developers in the comparative discourse on the topic. Second, the current research emphasises the active nature of housing segregation in Nigeria by analysing the role of these developers. Finally, the comparison of two Western countries with a post-colonial African nation helps refute the assumption that housing segregation and discrimination in the West are unique.

Policy and Practical Implications

The most critical implication for Nigeria is the regulation of developers' activities in this sphere. More precisely, the following measures should be taken to address the issue: (a) inclusionary zoning that requires developers to build a percentage of affordable units in private estates; (b) a prohibition on marketing activities that exclude residents on the basis of nationality, ethnicity, or income; (c) a requirement for price transparency by making all real estate prices available in the national currency; and (d) the implementation of professional standards and ethical rules that prohibit segregation-related practices in real estate businesses. Additionally, enforcement of the Fair Housing Act in the US should go hand in hand with the introduction of targeted policies, namely baby bonds and down-payment assistance, for communities suffering the adverse consequences of past discriminatory laws. In the UK, moving from a complaint-based model to one involving equality audits during housing allocation is needed.

Limitations

Despite providing valuable information on housing segregation and discrimination in Nigeria, the United States of America, and the UK, the analysis has a few drawbacks. First, it is largely based on secondary sources and does not include primary data collected from estate developers. Second, the chosen approach limits the study by failing to account for subnational variations (e.g., differences between Lagos and Kano in Nigeria). Finally, there is no quantification to establish a link between current segregation and the factors responsible for it (i.e., colonial legacy, postcolonial policies, and developer activities).

Recommendations for Future Research

These limitations could be addressed by conducting mixed-methods studies with greater emphasis on empirical data. More specifically, researchers should consider conducting housing market audits and interviewing developers and estate agents in Nigerian cities. It would be helpful to develop indices of segregation that capture its various aspects, including colonial legacy, state policies, and the role of developers. Comparative case studies of African cities other than Nigeria (e.g., Accra and Nairobi) could also be conducted. Furthermore, longitudinal research could be useful for evaluating the effectiveness of regulatory interventions.

Concluding remarks

Housing segregation is a system created and maintained by those who benefit from it, rather than a natural product of urbanisation. For instance, colonial GRAs, discriminatory housing

policies, and private gated communities are examples of such systems. While recognising that the walls built by people can be torn down, it is crucial to understand who is behind them today. Therefore, the paper's significance lies in emphasising that the struggle against housing discrimination requires addressing the modern agents who contribute to it.

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