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STRATA MANAGEMENT AND MAINTENANCE: A COMPARATIVE ANALYSIS OF MALAYSIA AND SELECTED COUNTRIES

**Ainul Ashiqin Ahmad Shuhaimi, Mariana Mohamed Osman², Noor
Suzilawati Rabe³, Sh. Mazlina Syed Khuzzan Alhabshi⁴**

*^{1,2,3,4}Kulliyyah of Architecture and Environmental Design,
UNIVERSITI ISLAM ANTARABANGSA MALAYSIA*

Abstract

The escalating trend of high-rise strata living, coupled with the evolution of strata law in Malaysia, prompts an in-depth exploration of the strata management landscape in Australia, Singapore, and Hong Kong. This comparative analysis delves into various aspects, including development trends, laws, practices, and issues, offering valuable insights for Malaysia's strata living and building conditions. Many approaches from the selected countries align with Malaysia, while certain aspects warrant further exploration. Specifically, into areas such as the calculation of share value and maintenance fee as well recovery of unpaid fees. Additionally, considering the aging building factor, there's potential to introduce a blueprint or guideline for reviewing maintenance charges and sinking funds and its collection. The long-term strategy for Malaysia involves investing in awareness and facilitating access to information on costs of strata living and building maintenance.

Keywords: residential high-rise strata development, Strata Management Act 757, NSW Strata Law, Singapore Strata Management, Hong Kongs's Building Management Ordinance

¹ PhD Candidate's email: ainulashiqin@gmail.com

INTRODUCTION

The notion of Strata Management was traced back to have originated in Australia and has been extensively embraced globally, including in countries like Singapore, Canada, the Philippines among others, including Malaysia. Each country that has adopted strata management laws has further customised the frameworks to better suit their local circumstances. In Malaysia, since the introduction of the strata management concept, the corresponding law have progressively evolved, undergone amendments and improved over time, has now reached a more advanced state, known as the Strata Management Act 2013 (Act 757) & Regulations, with still room for improvements as the strata development trend further develops.

To achieve the goal of quality strata living and strata building management, this paper explores the differences and similarities between existing laws and practices established in other countries, particularly Singapore, Australia and Hong Kong. Australia's New South Wales (NSW) jurisdiction was selected for the study is primarily based on the assertion that the strata management concept originated in Australia and that it has since been widely adopted globally. Singapore was selected as the second benchmarks country due to its statutory similarities in strata management. Like Malaysia, Singapore also looked to Australian strata law before formulating the strata management law to suit their specific context. In the case of Hong Kong, the prevalence of high-rise living and the aging residential building draw parallels with Malaysia. Apart from new high-rise developments, Hong Kong consistently focuses on maintaining and assessing the aging process of their high-rise residential structures, which is the same direction as for most existing low-cost high-rise strata housing in Malaysia.

The housing sector indirectly fosters the economic development through the construction activities. Consequently, the Malaysian government consistently underscores the importance of constructing sufficient and affordable housing. In this case, Singapore and Hong Kong is comparable to Malaysia's strata development scenario and are notable examples where a significant proportion of their population has been provided with housing (Shahedin, 2020; Yeung & Drakakis-Smith, 1974).

The results of this study are anticipated to enhance understanding and to fill existing gaps towards improving the Malaysian strata management practices.

STRATA DEVELOPMENT: AN OVERVIEW

Malaysia

As of December 2020, there are more than 1.589 million strata units within Peninsular Malaysia alone (Radha & Razali, 2023). Forward to the 2021 data from the National Property Information Centre (NAPIC), it was revealed that the

total transactions in the residential sector account for 70% (42,620 units) of the total transactions, surpassing other sectors. Meanwhile, comparing between strata and landed properties, strata development records a higher number of transactions in both the third quarter of 2019 and the third quarter of 2020. The high-rise strata properties specifically shows a more significant difference compared to landed properties, with transactions consistently ranging between 18% to 28% higher in all three quarters (NAPIC, 2022).

From the legal perspective, the strata properties in Malaysia are governed by Strata Titles Act, Strata Management Act, with association with the Housing Developers (Control & Licensing) Act & its Regulations, among other development related legislative documents. In the context of the Strata Management Act, the Commissioner of Buildings (COB) serves as the empowered legal authority responsible for overseeing the comprehensive implementation of the Act. The Act also incorporates the Joint Management Body (JMB) and the Management Corporation (MC), the inclusion that was based on the expectation that these management bodies are professionally capable to effectively handle building, financial and resource management of their respective registered strata schemes.

The Strata Management Act 757 assigns a distinct role to share units, employing them to calculate maintenance charges and sinking funds, while also reflecting the allocation of voting power among strata owners. The Act outlines specific weightage factors for different parcel types. Despite approval from the COB on the share unit calculations, there are still disagreements over the maintenance fee that often result in refusals to pay or disputes between residents and the management body. Residents' disapproval of the fee amount is a significant factor contributing to non-payment. A report noted that residents were only willing to pay RM20, even after the fee was already the reduced amount. The Strata Management Tribunal predominantly handles six common claims, with approximately 80% concerning the collection of maintenance charges, contributions, debts, and unit shares. The remaining 10% pertain to meeting-related issues, while another 10% focus on management operations (Roznah, 2022).

Several method were used to recover unpaid maintenance fee from strata owners, that includes Warrant of Attachment, or by publishing names of defaulters, restrictions over access to buildings and/or common facilities, and instalment payments, to name a few (Chan & Teh, 2020). While certain methods aimed at recovering outstanding sums show promise, they have not yielded satisfactory long-term results or effectively resolved the issue at hand.

Insufficient maintenance fee collection negatively impacts building conditions, hindering necessary repair and maintenance work. Thus, numerous reports and studies highlight the subpar condition of low-cost strata housing in

Malaysia, particularly emphasizing poor maintenance especially of lift services, poor cleaning services and inadequate management services (Noor Suzilawati et al., 2021; Nurul Ain Sahira & Aryani, 2021; Wahi et al., 2018). As poor maintenance builds up and the building ages, regrettably, there are no specific guideline for regular building condition valuation towards ensuring that the buildings are continuously fit to be occupied especially for the low-cost strata housing. Nor were there any in-depth discussion on appraisal for the revision of sinking funds as practiced in Singapore (KRI, 2023). Instead focuses on 'remedial' repairs upon conforming major failure or deteriorating building condition through 'responsive' maintenance programmes for affordable housing that includes Program Penyelenggaraan Perumahan (PPP), and the Program Tabung Penyelenggaraan 1Malaysia (TP1M) (Au-Yong et al., 2018; PropertyGuru Editorial Team, 2020).

Australia

Sydney's first high-rise strata housing dated back to the early 20th century, initially designed for both living and professional use. After the World War II, there was a surge in demand for residential units, however, at the time high-rise residential ownership was not popular compared to present time. The property market in NSW is one of the most sought after in Australia, with over 84,000 existing strata schemes in NSW and the year 2040 projection shows that half of Greater Sydney's population will reside in strata buildings (HtAG® Analytics, 2023). The rising population of strata title ownership can be attributed to various factor such as conversion of formerly single-owned buildings, new development initiatives and government policies in promoting vertical growth in urban areas. The growing importance of strata development is evident as it is projected to involve property management worth AUD350 billion in NSW alone. With 15% of the entire NSW population now resides in apartments, villas, units or townhouses.

Introduced in 1948, the Australian strata law has further since evolved and been adopted by various countries, each infusing their own nuance to align with distinct cultural and lifestyle characteristics. Presently the regulatory framework overseeing the strata schemes in NSW are in accordance to the Strata Scheme Development Act 2015 (Development Act) under the governance of the Minister for Customer Service and the Strata Schemes Management Act 2015 (Management Act) as administered by the Minister for Better Regulation and Innovation (NSW Government, 2021).

The management contribution fee is a responsibility outlined in the act, signifying the owner's duty to uphold and repair the common property. Unfortunately, this obligation is frequently disregarded by owners' corporation. In NSW, the law focuses on the account sold units rather than the total share

aggregate. The owners' corporation is formed when the sold units reached at least one-third of the total developed units. Each owner is obligated to pay levy, which is occasionally referred to as 'contribution' or 'fee'. The fee amount for each owner is determined by the treasurer or the strata manager based on their 'unit entitlement' which represents the owners' share of ownership in the strata scheme (NSW State Government, 2018). There is the 'administrative fund' allocated for everyday expenses such as garden maintenance and strata management fees and additionally, a 'capital works fund' is designated for significant building projects like the replacement of roofing, lifts, or fencing.

Owner's failure to pay the strata levy can be recovered through these methods (Singh & Benson, 2021):

- i) Legislation allows owners corporation to recover unpaid levies after one month, along with interest and recovery expenses. Strata manager handles unpaid levies, costs charged to owner's lot statement. Owners Corporation may appoint debt collection lawyer at AGM.
- ii) Garnishee Order: Court order requires entity (e.g., bank or employer) to pay money from debtor's bank account or wages to Owners Corporation.
- iii) Writ for Levy of Property: Court order authorizes sheriff to seize and sell debtor's assets to repay debt.
- iv) Bankruptcy Notice: Alerts individual debtor that bankruptcy proceedings may follow if debt remains unpaid.
- v) Creditor's Statutory Demand: Alerts company debtor that winding up proceedings may follow if debt remains unpaid.

When it comes to the shared facilities that are commonly found in mixed-use developments where owners from different sections of the building use these amenities, the legislation does not explicitly assign responsibility for maintaining and repairing these shared features. Instead, it stipulates that the management themselves must guarantee fair distribution of expenses related to these shared facilities among different sections of the building. Furthermore, the agreed statement must specify the method employed to apportion the cost associated with these shared expenses (NSW Government, 2021). Should owners' corporation wish to terminate, vary terms of agreement and matters of disputes, among others, Owners Corporation may proceed or apply to the NSW Civil and Administrative Tribunal.

Singapore

There are primarily four main residential categories in Singapore; Housing & Development Board (HDB) flats, condominiums, apartments and landed properties along with other types of dwellings. Reported data indicates that HDB

dwellings collectively constitute more than 50% of the total housing units in Singapore (Christudason, 2004; *Singapore Household Statistics*, 2022).

Therefore, Singapore is committed to advancing the strata property management, particularly given that a significant portion of the strata properties are public HDB flats rather than private residential high-rises which are maintained and managed by respective town council. The ownership of public strata housing typically takes the form of a leasehold with a 99 years tenure. Despite the leasing arrangement, tenants are responsible for their individual units. While the Town Council is tasked with maintaining the common properties. Whereas in private developments with shared properties bear responsibilities to upkeep the common properties. The maintenance and management of strata properties in Singapore are overseen by the Land Title (Strata) Act (LTSA) and the Building Maintenance and Strata Management Act 2004 (BMSMA).

Each home purchaser is obligated to take responsibilities for aspects like the Share Unit Value, Establishment of Management Corporation, Maintenance and Sinking Fund, Managing Agents, utilization of common properties, and dispute resolution, among others. The collection of maintenance fee varies between HDB properties that pays according to respective Town Council, whereas private properties pay according to their respective property managements (A. Khoo, 2022; Ng, 2022). However, the extent of expectation and responsibility associated with managing and maintenance affairs has grown notably challenging, especially to the Town Council due to the rising costs and the inclusion of additional features in newer properties, making such service to may not necessarily be of economic value to continue to be under the responsibility of the Town Council (Ng, 2022).

Despite being under the management of the Town Council, Singapore too faces poor payment of maintenance fees. There are various strategies available to management to recover shortfalls in the maintenance fund resulting from defaulters of the S&CC, such as (Virginia Tanggono, 2021):

- i) Subject to interest charges and receipt of a lawyer's letter.
- ii) Defaulters may face fines of up to \$10,000 Singapore dollars.
- iii) Management may escalate the matter to the Tribunal or Courts.
- iv) The property may be auctioned off with specific prerequisites.

In addition to proactive maintenance planning conducted by property managers, the Singapore government has implemented long-term renewal policies for public housing, the likes of Lift Upgrading Programme (LUP), and the Home Improvement Programme (HIP) to name a few (Ahmad Ezanee et al., 2015)

Hong Kong

In Hong Kong, there are typically nine prevalent housing styles, including high-rise, low to mid-rise, duplexes, needle towers, walk-ups, townhouses, village houses, and luxury residences. Beyond these common housing types, the housing sector in Hong Kong can be classified into public rentals and subsidized flats administered by the Hong Kong Housing Authority. Public rental flats and subsidized sale flats make up approximately 43% of the total units. Factoring the private quarters that includes various types of flats and private blocks, high-rise residential properties, the total constitute over 50% of the overall housing supply in Hong Kong (Census & Statistics Department, 2022).

The statistic indication of continuous increase in the number of housing units in Hong Kong, especially in high-rise residential properties has significant implications for property management to uphold building quality. The relevant statutory provision include the Building Management Ordinance (BMO), which safeguards incorporated owners, Deed of Mutual Covenant (DMC) and the Property Management Services Ordinance (PMSO) which regulates the functioning of property management corporations (C.W. Ho & Liusman, 2016; Tiun, 2006; Wadu Mesthrige, 2021; Wong & Lai, 2021). There are primarily three types of owners' corporation in Hong Kong, Mutual Aid Committees and Owners' Committees (OC), Incorporation of Owners (IO), and / or the property management company (PMC). Of these, only Incorporation of Owners receive protection under the BMO (C.W. Ho & Liusman, 2016; Wadu Mesthrige, 2021).

The formation of owners corporation among owners of high-rise residential are voluntary in Hong Kong, unlike in Australia and Singapore which is a regulatory requirement to form the owners corporation and are automatically formed according to the ownership (Consumer Council, 2023). The management fees' calculation and charges are based on undivided shares, floor area and service contract with PMC. It is crucial to note that the developer creates the Deed of Mutual Covenant (DMC) following its Guidelines and potentially without the presence nor involvement of the purchasers and potential purchasers throughout the process. As a result, management fee disputes occasionally arise involving matters like undivided shares, unfair division of common facilities and unfair distribution of expenses amongst owners. If owners fail to pay management fees, maintenance fees, or funds, the owners' corporation (OC) may take the following actions (Home Affairs Department, 2024):

- i) Contact owner/tenant for payment before due date.
- ii) Send reminder via double registered mail with relevant legislation extract.
- iii) Pursue payment through lawyer, with possible Land Registry record of default.
- iv) File claim with Small Claims Tribunal for outstanding sums.

- v) Small Claims Tribunal handles claims up to \$75,000; District Court for claims \$75,000 to \$3,000,000; High Court for claims over \$3,000,000.

In terms of substantial maintenance or refurbishment initiatives, Hong Kong initially implemented various funding programs, including the Mandatory Building Funding Program, interest-free loans for household maintenance, and Funding Group Ownership Case Law Group funding. However, authorities observed overlaps with the government's Public Local Maintenance Funding. Consequently, the decision was made to discontinue the overlapping plans and channel support through the Public Local Maintenance Funding, People in Need to Repair Self-Occupied Property Allowance Plan, and the Building Safety Loan Plan of the Housing Department (Urban Renewal Authority, 2024). These programs aim to cater to the diverse needs of property owners and assist them in meeting their maintenance responsibilities.

Despite the positive impact of these funding initiatives, challenges persist for buildings without established corporations, mainly due to the majority of owners being elderly. To address this issue, the Urban Renewal Authority has introduced the Integrated Building Rehabilitation Assistance Scheme, incorporating the Building Maintenance Grant Scheme for Needy Owners (BMGSNO). The BMGSNO provides financial aid to eligible owner-occupiers aged 60 or above, meeting income and asset limits or receiving the Old Age Living Allowance (OALA) among other criteria, to help cover repair and maintenance costs for their self-occupied properties. This initiative aims to alleviate building deterioration and enhance safety. (Urban Renewal Authority, 2023).

METHODOLOGY

This study employs a comparative analysis to explore distinctions in the enforcements and practices of strata management between Malaysia and other selected countries. Where the data is presented using the cross-tabulation method and matrix table, providing insights into the strata law and management practices. This paper extends its comparative analyses to examine the fundamental background of strata management and maintenance and practices along with the respective legal framework in conducting the assessment.

DISCUSSION

The most significant similarities between these four countries are the increasing demand for high-rise strata properties, that includes the increasing trend for mixed-use developments. Though by comparison each country has different drive, such as Singapore and Hong Kong are mainly due to scarcity of land while

for Australia and Malaysia are more into the convenience that strata living has to offer.

This study presents its findings indicating the difference in practices and regulation enforcements within Malaysia and other counties gathered as tabulated in Table below:

Table 1: Summarized comparison of strata management

	Malaysia	Australia	Singapore	Hong Kong
Strata laws and regulations	Strata Title Act 318 Strata Management Act 757	Strata Schemes Development Act Strata Scheme Management Act	Land Title (Strata) Act Building Maintenance and Strata Management Act 2004	Building Management Ordinance Property Management Services Ordinance
Laws on deciding of Maintenance fee	Formula as provided in SMA757 and STA318	No specific law. Calculated based on unit entitlement, while frequency of payment is decided by owners' corporation.	Assigned share value approved by the COB.	According to the Deed of Mutual Covenant Guidelines
Authority and Stakeholders	Commissioner of Buildings (COB), Joint Management Body (JMB), Management Corporation (MC)	Minister for Customer Service, Minister for Better Regulation and Innovation, Owners Corporation	Commissioner of Buildings (COB), Town Council, Owners' Corporation	Owners' Committees (OC), Incorporation of Owners (IO), property management company (PMC)
Owners' Corporation	Compulsory / regulated	Compulsory / regulated	Compulsory / regulated	Voluntary
Strata Living Guidelines	Strata Management Handbook: A Clear and Comprehensive Guide to Strata Living in Malaysia by REHDA	Strata Living: Get Involved by NSW Government	Strata Living in Singapore: A General Guide by Building and Construction Authority	A Guide on Building Management Ordinance (Cap.344)
Maintenance fee Guideline	Calculated based on Share Unit Allocation	No Specific law, Estimation by Owners Corporation for	<u>For HDB and Private schemes:</u> Share value	Amount is based on size of each unit, undivided

	Malaysia	Australia	Singapore	Hong Kong
	through weightage factor	Administrative and Capital Work Funds	<u>Mixed-use developments:</u> Weight Factor calculation	shares, and service contract
Recovery of sums due	Warrant of Attachment, publishing names of defaulters, restrictions over access to buildings and/or common facilities, and instalment payments	Imposing interest on unpaid levies, Court order, seize and sell, Bankruptcy, Creditor's Statutory Demand	Lawyer's letter, fines up to \$10,000, Tribunal / Court, auctioned off properties.	Direct negotiation, Registered mail, Lawyer's letter, Tribunal.
Long term (major) Maintenance programme	Program Penyelenggaraan Perumahan (PPP), Program Tabung Penyelenggaraan 1Malaysia (TP1M)	Each strata development must make the 10-year plan from the first AGM and reviewed at least every 5 years.	Lift Upgrading Programme (LUP), Home Improvement Programme (HIP)	Public Local Maintenance Funding, Integrated Building Rehabilitation Assistance Scheme and many more

Source: Author (2023)

The findings indicate similarities on the basis of strata law framework between Malaysia, Australia and Singapore. The finding in Table 1 shows that the strata law in Malaysia and Singapore reflects thereof the Australian strata law as was claimed earlier in the study on the historical aspect of strata law.

Further onto Table 1, the comparative study found that both Malaysia and the three analysed countries encounter challenges associated to maintenance costs and / or maintenance charges. In general, the approach to calculating maintenance charges based on floor area is similar across selected countries. However, Malaysia lacks a specific standard or rates of reference or fee scales (Tiun, 2006) that stakeholders can use to assess the fairness of the charged fee amount. Unlike Australia, which depends on property market value, and HDB units in Singapore with justified rates due to subsidized fees by the local council, Malaysia lacks a general and accessible baseline for evaluating maintenance charges. This poses a concern, especially considering the number of disputes on maintenance rates filed by strata owners against their respective management bodies.

Disputes over the fairness of maintenance fees have exacerbated problems such as delayed contributions and outstanding payments. While each country and management body employ its own methods for recovering overdue

sums, Malaysia tends to take a more lenient approach, allowing for instalment payments or restricting access to common facilities. In contrast, countries like Singapore and Hong Kong frequently utilize legal notices, a practice permitted under their respective strata management regulations. Considering these practices, Malaysia could benefit from adopting a more proactive approach, including Lawyer's letters like Singapore and Hong Kong as well as implementing late payment penalties akin to those in Australia, to deter tardiness and improve the current situation of outstanding dues.

Concerning long-term major refurbishment and aging buildings, Malaysia, Singapore, and Hong Kong provide subsidies or funding plans with specific conditions. In contrast, Australia mandates each development to create a 10-year plan for major rectification works from the first general meeting, subject to review at least every 5 years.

In regards to mixed-use developments, there is an arise concerning the affairs in differentiating and defining the maintenance costs for shared common facilities among various types of property owners and tenants. Singapore in particular has imposed two different calculation formula where residential strata employ floor area based while the mixed-use development employs the weight factor method. This differs from the situation in Malaysia, while the strata management act recognizes the common properties, it has yet to further define the diversified shared properties with exclusive access for mixed-use development. In reference to a High Court ruling on a mixed development, where the share units in the said mixed development were considered to be unfair for the developer to distribute the maintenance charges based on selling prices (N. Khoo, 2021). In reality, there is no connection between parcel selling prices and the distribution of maintenance costs for common property. The unequal share units make it unjust and unreasonable to impose a fixed maintenance charge rate for all parcels. Hence proposals to meet the diverse approaches to distinguish the share unit formula between residential strata and mixed-use or commercial strata development. There has been an ongoing discussion about amending this aspect of share unit calculation for greater equity, the significance of these discussions has increased as Malaysia's strata development becomes progressively more complex over time.

There is a concern regarding the availability of clear documents and guidelines for property managers or owner's corporations to ensure effective strata management and maintenance. In countries like Australia and Singapore, related authorities issue such materials freely for accessibility. It would be more commendable if similar resources were provided by relevant authorities for broader access and staple reference during COB trainings for both management bodies and awareness campaigns amongst strata owners and residences. This is significant considering the workings of COB that currently owns their localized

approach and standard procedure to ensure quality strata management within their jurisdiction.

The professional practices of property managers in Australia, Singapore, Hong Kong, and Malaysia, each adhering to separate codes of conduct established by their respective professional bodies. To highlight a distinct approach in Malaysia, here, quality standards and operating procedures for Joint Management Bodies (JMB) or Management Corporations (MC) are evaluated as 'Good' through a Star Rating evaluation, assessed by the COB. While this practice serves as an encouragement for management bodies, it also presents a challenge due to the variations in the ability of JMB/MC to engage professional management and technical teams.

CONCLUSION

This paper has successfully identified, compared and contrasted practices in building and strata management, specifically focusing on maintenance works, and fee variations in several scenarios in high-rise strata residential buildings. Building property management plays a significant role in influencing the quality and satisfaction of building conditions and services. This paper was able to highlight the magnitude and importance of strata management and showcases the different issues, plans and impact of urban living and overall quality of life of strata living as observed in Australia, Singapore and Hong Kong. The comparison aids in identifying challenges and proposing the potential solutions applicable to the context of strata management in Malaysia.

DISCLOSURE STATEMENT

Following international publication policy and our ethical obligation as a researcher, we report that we have no conflict of interest.

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*Ainul Ashiqin Ahmad Shuhaimi, Mariana Mohamed Osman, Noor Suzilawati Rabe, Sh. Mazlina Syed
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