

**INTERNATIONAL JOURNAL OF LAW,
GOVERNMENT AND COMMUNICATION
(IJLGC)**www.ijlgc.com**DISTINCTNESS OF STRATA LEASE SCHEME IN MALAYSIA'S
STRATIFIED BUILDING DEVELOPMENT: A REVIEW**Nur Huzaifah Zainal^{1*}, Salfarina Samsudin², Fatin Afiqah Md. Azmi³¹ Faculty of Built Environment and Surveying, Universiti Teknologi Malaysia, Malaysia
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This work is licensed under [CC BY 4.0](https://creativecommons.org/licenses/by/4.0/)**Abstract:**

Strata title is a document of ownership for a unit parcel in a stratified building such as a condominium or apartment. The idea of introducing land lease term registration onto strata title has allowed the creation of a newer type of strata scheme called the strata lease scheme. However problem arises when there is no specific law gazetted for the strata lease scheme, which has caused some confusion among scholars with different opinions on which laws apply to this concept. This is because the features of a strata lease scheme can be easily confused with a strata scheme. Therefore, this paper, referring to Malaysian laws, will review the application of the strata lease scheme concept within these legislation statues. It is found that a strata lease scheme is created under the purview of the National Land Code [Act 828]. Although, it does not have specific laws catering for the need for a strata lease scheme; instead, it is governed by several legislations to meet the requirement of its development intention. The distinctness features of a strata lease scheme can be found through specific laws which is discussed further in the paper. To conclude, Malaysian laws are sufficient to oversee the development of a strata lease scheme. However, minor amendments to the legislation may enhance the distinctness of strata lease scheme features in Malaysia.

Keywords:

Land Leasing, Lease Registration, Malaysian Law, Strata Lease Scheme, Stratified Building

Introduction

The practice of land leasing is frequently used in agricultural land. However, land leasing has expanded its use for residential and commercial property development (Shamsuddin & Vale, 2017). Due to the scarcity of land, a development for high-rise buildings in fulfilling housing needs is likely in demand. The land shortage may include limited land ownership transferred to the developer for future strata scheme development. It is where the concept of the strata lease scheme is introduced. A strata lease scheme is not explicitly regulated or administered by its own law (Zainal et al., 2022a). It relies on applying the land leasing concept under the National Land Code [Act 828]. The concept involves the registered land proprietor allowing the developer to develop a strata scheme on his land without transferring land ownership to the developer. Upon the completion of building construction, a strata title is issued to every parcel. A strata lease scheme only exists when a lease is registered onto all the strata titles in the strata scheme.

Creating a lease on a strata title is the significant intention in creating a strata lease scheme. According to Zainal et al. (2022a), the initial strata lease schemes were formed in the State of Penang in the early 1990s. However, many people still need to learn about the definition of the strata lease scheme because it was never lawfully used in Malaysia (Zainal et al., 2020a). Abu Bakar et al. (2021) study tells the concept of a private lease scheme is new, an identical concept of a strata lease scheme but with different jargon. The concept is never mentioned in any provision of the National Land Code [Act 828], the Strata Title Act 1985, and the Housing Development (Control & Licensing) Act 1966 (Abu Bakar et al., 2021).

Since the strata lease scheme does not have a law of its own, some issues arise in Malaysia's current law governing the scheme. There are ongoing discussions regarding potential changes to Malaysian law to address concerns related to the strata lease scheme. Some experts have proposed revisions to the legal framework to support this scheme's development better. Still, there is a debate about whether these changes should be made to existing laws or if new statutory specifications should be explicitly created for the strata lease schemes. Although the strata lease scheme is without a law on its own, Zainal et al. (2022a) pointed out that the character of the strata lease scheme and the application of the concept can be found by cross-referencing several Malaysian laws. The issues arose with scholars having contrasting views on what laws apply to the strata lease scheme concept. Hence, there is a need to look at these laws and see how any provisions of the statutes protrude to the concept of the strata lease scheme. Additionally, no strata lease scheme definition is gazetted in any Malaysian law. For this reason, the features of a strata lease scheme may be mistaken for a strata scheme. Therefore, this study aims to understand the laws and to see if these laws can underpin the distinctness of a strata lease scheme.

Literature Review

The literature review first explains the concept of land leasing and the entity of the strata schemes. Next, it tells how applying land leasing on the strata schemes allows the creation of a strata lease scheme. Further, the literature review examines the strata lease scheme's concept, laws and issues arising.

Land Leasing Concept

Under Section 221 of the National Land Code [Act 828], the title proprietor may grant leases for a term exceeding three years and up to a maximum of ninety-nine years. The land leasing

concept involves a lease transaction evidenced by a written agreement, such as a lease agreement stipulating the lease term and the obligations of the lessor and lessee (Maidin et al., 2008). A lease agreement may only be valid if registered onto the title. Therefore, an instrument of a lease, such as Form 15A of the National Land Code [Act 828], must be presented to Land Registrar for registration. Only then is the instrument registered with a lease memorial reflected on the title. Figure 1 illustrates the land leasing application where the transaction is made between a lessor, the landowner, and the lessee, the occupant of the land.

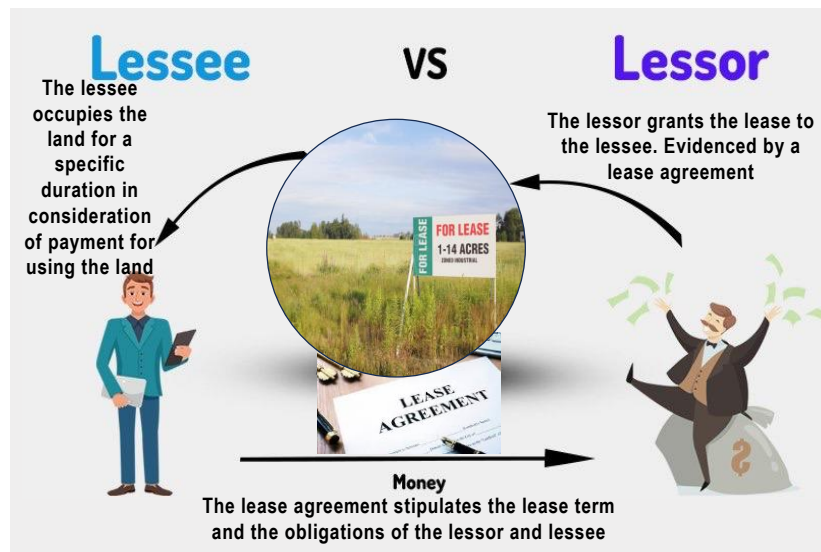


Figure 1: Land Leasing Concept

Source: Author's Elaboration

Understanding Strata Schemes Entity

A strata scheme development may involve the construction of a high-rise building. This follows with an application of subdivision of the building required by Sections 6 and 8 of the Strata Title Act 1985 for issuance of strata title as a document of ownership for each of the units in the building (Izanda et al., 2020; Kamaruzzaman et al., 2010). A subdivided building is a stratified building that has been issued with an individual title for each strata unit, where this title is known as a strata title. The stratified building is sometimes pronounced as a strata building. A strata building is only a part of a strata scheme. A strata scheme comprised stratified buildings with physical entities, including common properties, parcels, and accessory parcels, each with its own strata title (JKPTG, 2020; Izanda et al., 2020; Faizal, 2014; Antoniades, 2010; Kamaruzzaman et al., 2010). The physical entities of the strata scheme and the lease scheme are the same (Zainal et al., 2022b). However, the differences can be seen on the registration memorial printed on the strata title. Buyers are registered as proprietors of the strata title in a strata scheme, while in a strata lease scheme, buyers are registered as lessees or trustees (Zainal et al., 2022b). Figure 2 shows physical entities in both strata schemes and strata lease schemes.

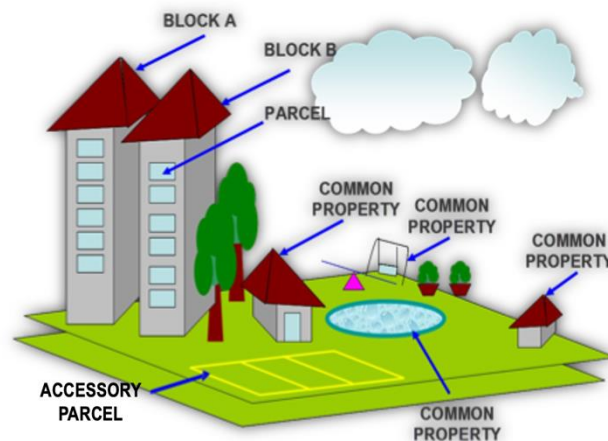


Figure 2: A Strata Scheme and Strata Lease Scheme Entities

Source: JKPTG (2020)

The Concept of Strata Lease Scheme

Registration of a strata lease is a deal recognised under the National Land Code [Act 828]. Section 5 of the Strata Titles Act 1985 allows lease registration under National Land Code [Act 828] to be applied to the strata title. A strata lease is a deal whereby the registered strata title proprietor allows a lessee to purchase and occupy the parcel for a specific duration in consideration of payment on the purchased price of the parcel. It is a simple leasing transaction in which the owner and the buyer directly enter into a lease agreement. The lease registration begins after the construction strata building is completed, and the strata title is issued to each parcel. It involved the registration of Form 15A (Instrument of Lease) of Section 221(4) National Land Code [Act 828]. The instrument of lease Form 15A is signed between the land owner and the buyer of the strata parcel. The first buyer of the parcel may sell his parcel to a subsequent buyer by transferring the balance term of the lease using an instrument of transfer, Form 14A, National Land Code [Act 828]. The registration mechanism for the strata lease scheme is shown in Figure 3.

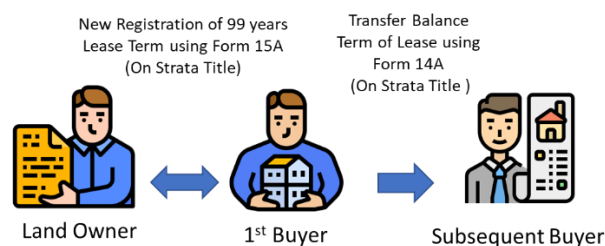


Figure 3: The Mechanism of Registered Lease in Strata Lease Scheme

Source: Zainal et al. (2022b)

The Law of Strata Lease Scheme

There is no specific definition of the strata lease scheme since no law gazetted on the meaning of a strata lease scheme. Siang et al. (2015) and Izanda et al. (2020) did not mention the word strata lease scheme in their study but explained the legal issues that may arise in leasing a strata parcel. Even Abu Bakar et al. (2021), Mohsin et al. (2020), and Zainuddin et al. (2021) address the word strata lease scheme differently. Abu Bakar et al. (2021) called it a private lease

scheme, Mohsin et al. (2020), and Zainuddin et al. (2021) pronounced it a strata private lease scheme. Only Zainal et al. (2022a) and Zainal et al. (2022b) mentioned it as a strata lease scheme because it is a strata scheme that has a registered lease on all strata titles. Ultimately, these scholars were trying to review what law the concept is relevant to be applied. Mainly, the scholars focused on the laws relating to the registration of leases, strata building management, and the buyer's position, a lessee with no rights to ownership.

Table 1 lists the legislation referred to by the scholars. The laws and topics reviewed by the scholars may vary from one another. But what concerns them the most are the limitations in these laws, which restrict certain rights to related parties in a strata lease scheme. For example, a lessee only has the exclusive rights to possession but not the absolute rights of ownership (Izanda et al., 2020). The current law does not provide the right to impose the necessary liabilities should the lessee fail to perform, just like any regular parcel proprietor (Siang et al., 2015). Buying and selling using the current Schedule H & G in the Housing Development (Control & Licensing) Act 1966 may be void as it does not meet the requirement of ownership transfer to the buyer as permitted by the Schedule (Abu Bakar et al., 2021).

All scholars except Zainal et al. (2022a) proposed adjustments to the Malaysian law to suit the need for strata lease scheme development. Some suggested several amendments to the current laws, and some suggested a new set of laws on the strata lease scheme. Mohsin et al. (2020) proposed an amendment in the National Land Code [Act 828] to incorporate the strata lease mechanism. Abu Bakar et al. (2021) suggested an amendment to Housing Development (Control & Licensing) Act 1966 to include a new Schedule specifically for selling and buying a lease scheme and to have a new certificate of a lease in both National Land Code [Act 828] and Strata Title Act 1985 as a document of possession for the purchased lease unit. In contrast, Siang et al. (2015) and Zainuddin et al. (2021) suggested a new law to cover the dealing in leases and to overcome the issues relating to managing the strata lease scheme. Despite the urge to modify the law, Zainal et al. (2022a)'s study concluded that the current Malaysian law does not need to be amended to cater to the administration of the strata lease scheme. Zainal et al. (2020a) summarised nine laws required to govern the development of strata lease schemes. All legislation must be read simultaneously to reveal the true character of a strata lease scheme. Still, both Zainal et al. (2022a) and Abu Bakar et al. (2021) agreed that a legal framework for a strata lease scheme or a private lease scheme needed to be established to validate the strata lease scheme concept and to have better process control over future development.

Table 1: The Malaysian Laws on Strata Lease Scheme or Similar Concept by Authors

Author	Law Reviewed	Topic Discussed
Abu Bakar et al. (2021)	National Land Code [Act 828] Strata Title Act 1985 Strata Management Act 2013 Housing Development (Control & Licensing) Act 1966	<ul style="list-style-type: none"> Reviewed the legal implication for the buyers of a private lease scheme. Examined the compatibility of existing law with dealing under a private lease scheme.
Izanda et al. (2020)	Strata Title Act 1985	<ul style="list-style-type: none"> The proprietor's requirement for subdivision of the building application is if the parcel is already intended to be leased.

Author	Law Reviewed	Topic Discussed
Mohsin et al. (2020)	National Land Code [Act 828] Strata Title Act 1985 Strata Management Act 2013	<ul style="list-style-type: none"> • The mechanism of the strata private lease scheme. • The effects of implementing the strata private lease scheme.
Siang et al. (2015)	National Land Code [Act 828] Strata Title Act 1985 Strata Management Act 2013	<ul style="list-style-type: none"> • Limited beneficial ownership of the parcels.
Zainal et al. (2022a)	National Land Code [Act 828] Strata Title Act 1985 Strata Management Act 2013 Trustees Act 1949 Federal Constitution Probate & Administration Act 1959 Small Estates (Distributions) Act 1955 Town & Country Planning Act 1976 Housing Development (Control & Licensing) Act 1966	<ul style="list-style-type: none"> • The laws governing the strata leasing concept. • Characteristics of strata lease scheme.
Zainal et al. (2022b)	National Land Code [Act 828] Strata Title Act 1985 Strata Management Act 2013	<ul style="list-style-type: none"> • The features & uniqueness of the strata lease scheme. • Categorising type of strata schemes.
Zainuddin et al. (2021)	National Land Code [Act 828] Strata Title Act 1985 Strata Management Act 2013	<ul style="list-style-type: none"> • The level of understanding of the private lease concept among buyers and property managers. • The position of the lessee is based on the existing Malaysian law.

Source: Author's Elaboration

The Legal Issues in Strata Lease Scheme

A study by Zainal et al. (2022) found that current laws and statutes can regulate the development of strata lease schemes within the limitations of these laws. However, Abu Bakar et al. (2021) and Mohsin et al. (2020) suggest that amendments to current legislation are necessary for better process control. Zainuddin et al. (2022) and Zamri (2019) discuss the increasing legal issues in strata building management, while Teoh (2003) argues that the current law, particularly the Strata Title Act 1985, cannot facilitate strata scheme development processes. Chang (2020) and the National House Buyer Association (2021) express concerns that the current law may not provide enough protection for lessees as purchasers, is biased in favour of lessors, restricts purchaser rights to form committees, lowers property values, impedes inheritance rights, and allows developers to profit from the leasing concept in property development. These scholars' comments highlight the irregularity in understanding the concept of strata lease building and the legislative issues that arise within it. Ultimately, these scholars reason that the laws must be revised to implement a strata lease scheme concept that benefits all parties involved.

Method

This research uses a case study approach to selected strata lease scheme projects in Malaysia. Practitioners from local authorities and agencies who administered the development strata lease schemes were interviewed to gather information for the case study. Respondents were allowed to describe their experience with strata lease schemes through non-structured interviews. The interview inputs are used as the primary data, while official documents and records are used as secondary data. The data from these interviews and supporting documentation are analysed using thematic analysis to determine the unique characteristics of the strata lease scheme, as required by law. The data analysis is simplified into themes according to its title registration and proprietorship position. Each theme discussed is based on its relevance to the National Land Code [Act 828], the Strata Title Act 1985, the Strata Management Act 2013, and Trustees Act 1949. Qualitative research using case study approaches is applied to seek legal issues from the respondents' perspective. The qualitative research approach examines how well the legal institutions meet societal needs and how the law has been applied and enforced. Besides the case study approach, this study uses the literature review research approach on the studies by scholars who discussed the laws involved in the current Malaysian strata lease schemes. The objective is to highlight the distinct features of a strata lease scheme found in scholars' legal reviews and the input of interviews from the respondents.

Findings

Based on the interview input, it was known that the buyers are registered as proprietors in a strata scheme. However, contrary to a strata lease scheme, the buyers are registered as lessee or trustees if the buyers are more than one person (but not exceeding four persons). According to the National Land Code [Act 828], the buyer and landowner must sign a lease agreement when purchasing a strata unit with a 99-year lease term. This lease becomes valid once registered using Form 15A of the National Land Code [Act 828]. If the previous buyer wants to transfer the remaining lease term to a new buyer, they can do so using Form 14A of the National Land Code [Act 828]. The land proprietor of a strata lease scheme has ownership rights to both land and strata parcels, while a registered lease means the lessee only has rights to possession of the strata unit during the lease term. A registered lease is an irrefutable registration that cannot be contested unless it is fraudulent or invalid. A lease instrument must be registered to protect both parties interests. The lessee has full rights to the strata unit during the lease term, but the original land proprietor remains the sole owner of all strata titles in the lease scheme.

According to the Strata Management Act 2013, buyers in both the strata and lease schemes can establish a Joint Management Body. The difference in features is when the buyer receives their individual strata titles. In a strata scheme, the proprietor of the strata title must form a Management Corporation once the title is transferred to the buyers; however, in the case of the strata lease scheme, where there is only one owner for all strata parcels, that single owner becoming the Management Corporation as per Article 2(3) of the Second Schedule of the Strata Management Act 2013. The differences between a strata scheme and a strata lease scheme are simplified in Table 2. Table 2 shows the different features between a strata scheme and the strata lease scheme that can be outlined from the law reviews and the information given by the respondents.

**Table 2: The Differences Features of a Strata Scheme
and a Strata Lease Scheme**

Features	Type of Strata Scheme	
	Strata Scheme	Strata Lease Scheme
Registration of Buyers in Strata Title	Registered as proprietor	Registered as lessee or trustees
Significant Document	Strata Title	Instrument of Lease (Form 15A)
Forming a Management Committee before the issuance of strata title	All buyers may form the Joint Management Body	All buyers may form the Joint Management Body
Forming a Management Committee after the issuance of strata title	Only registered proprietor can form Management Corporation	Lessee not able to form the Management Corporation
Type of Ownership	Multiple owners	Single ownership
Term of Possession	Perpetuity	99 years lease

Source: Author's elaboration

Discussion

The development steps in constructing a strata scheme and a strata lease scheme are identical (Zainal et al., 2022b). Both strata and lease schemes look alike and have the same entitles of common property, parcel, and accessory parcel. No one will be able to recognise a strata lease scheme except those who involve in developing and administrating the scheme. According to Zainal et al. (2022b), only land proprietors, land administrators, and land registrars labelled the strata lease schemes to distinguish them from the regular strata schemes. Though the strata lease scheme may easily be mistaken as a strata scheme, the distinctness of a strata lease scheme can be outlined from the relevant laws, which are further explained below.

Registration of Lease

The buyer and parcel proprietor signed a lease agreement documenting a purchase of a strata unit for a ninety-nine-year lease. The lease shall only be enforced when the instrument of the lease, Form 15A, is registered by the Land Registrar (Section 221(4), National Land Code [Act 828]). A registered buyer of a unit in a strata lease scheme is noted as a lessee. The buyer may sell the strata unit through a transfer of the lease to the subsequent buyer using an instrument of transfer, Form 14A (Section 218(1), National Land Code [Act 828]).

Registered Lease Entity

A lease is a strata title registerable interest owned by a lessee or trustees, including accessory parcels; a registered lease does not have an undivided share (Section 345(1), National Land

Code [Act 828]). When many buyers are in a unit, the buyers are registered as trustees rather than lessees. No more than four people may register because of the maximum number of trustees permitted in Section 225(2) of the National Land Code [Act 828] and Section 39(1)(a) & 39(1)(b) of the Trustees Act 1949. A registered lease is an irreversible registration that cannot be challenged unless the registration is fraudulent or the instrument of registration is faulty (Section 340(1), National Land Code [Act 828]).

Ninety-nine Years of Leasing Term

In the findings by Zainal et al. (2022a), the registered lease period given to the first buyer is the maximum term of ninety-nine years, as allowed in the National Land Code [Act 828]. The reason was that a ninety-nine-year term of the registered lease is more to be bankable, which helps the first and subsequent buyers obtain facility aid and bank loans from the financial institutions.

Single Proprietorship

Section 4 of the Strata Title Act 1985 defines a Management Corporation member as the parcel's registered proprietor. Since there is no proprietorship transfer in the strata lease scheme, the land owner remains in a single proprietorship status, and he remains the proprietor for all strata parcels in the strata lease scheme. Therefore, it is unlike to form a Management Corporation among the buyers who are the registered lessee on strata title. Nevertheless, the Second Schedule of Subsection 2(3), Strata Management Act 2013, mentioned that when a strata scheme has single ownership, a decision made by the sole owner is as good as a decision made by a Management Corporation. The Second Schedule translates a sole proprietor to be the Management Corporation without forming an actual physical team of the Management Corporation. For this reason, in most strata lease schemes in Penang, the land owners administrate and manage the strata buildings by themselves (Zainal et al., 2022a).

Conclusion

This study reached its objective in highlighting the distinct features of a strata lease scheme from a strata scheme, as the study aimed to investigate the suggested laws reviewed by scholars and to find out if these laws can distinguish the features of a strata lease scheme. Based on the discussion, the nine laws suggested by Zainal et al. (2020a) distinguish the strata lease scheme concept. But alone, these laws individually do not protrude the distinctness of the strata lease scheme. As suggested by Zainal et al. (2020a), there must be a cross-refer between laws continuously so that the administration of strata lease scheme development is done accordingly to the requirement of Malaysian laws. The significant distinctness of a strata lease scheme is the application of lease registration and the creation of a sole proprietorship. A strata lease scheme will only exist when the lease terms are registered onto the strata title. The rule of thumb is to have all strata titles of a stratified building registered with the lease to become a strata lease scheme. When some strata titles are registered with a lease, and some are transferred ownership, it is no longer a strata lease scheme. A strata lease scheme may have many buyers as lessee or trustees. Still, only one owner or sole proprietor will manage the stratified building as the Management Corporation. The distinct features of the strata lease scheme are illustrated in Figure 4.

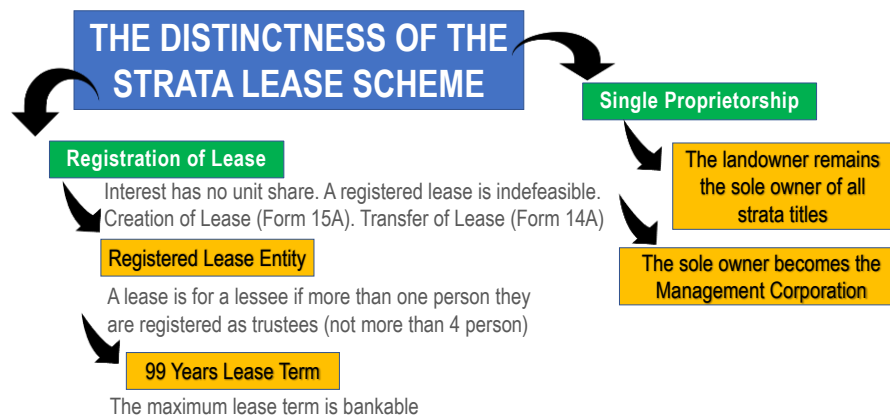


Figure 4: The Distinctness Features of a Strata Lease Scheme

Source: Author's Elaboration

To conclude, Malaysian laws are sufficient to oversee the development of a strata lease scheme. However, a minor update on the current legislation may enhance the distinctness of strata lease scheme features. The suggestions for updating current legislation may include a definition of a strata lease scheme, a brief explanation of the application of lease registration onto strata title to create a strata lease scheme and the features of a single proprietorship. Nevertheless, with or without any law amendment, the distinctness of a strata lease scheme can be translated from the current laws. However, should the government be considering undertaking a specific legal framework for a strata lease scheme, then the suggestions by Abu Bakar et al. (2021), Mohsin et al. (2020), Siang et al. (2015), and Zainuddin et al. (2021) ought to be considered.

Finally, this study clarifies the distinctness of the strata lease scheme in Malaysia according to the law. While there is yet to be a complete framework for developing the scheme, this study can aid policymakers in comprehending the current legislation and state of strata leases before making any changes to policy or laws. Since formal studies have yet to be conducted on strata leasing in Malaysia, this study serves as a foundation for future researchers to build upon.

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References

- Abu Bakar, N., Azmi, R., Sufian, A., & Saripan, H. (2021). The Legal Implications of a Sale of Property by Malaysian Developers under the Private Lease Scheme: In two minds? *Environment-Behaviour Proceedings Journal*, 6(17), 183–187. <https://doi.org/10.21834/ebpj.v6i17.2867>
- Antoniades, H. (2010). A Comparative Analysis of Australia's Sinking Fund Governance within a Strata Scheme. In International Conference on Construction & Real Estate Management. China Architecture & Building Press.
- Chang, K. L. (2020, December 6th). Private lease scheme: A risk for house buyers. Focus Malaysia. Retrieved from <https://focusmalaysia.my/private-lease-scheme-a-risk-for-house-buyers/>

- Faizal, K. (2014). The Development of an Effective and Efficient Dispute Resolution Processes for Strata Scheme Disputes in Peninsular Malaysia (Issue March). The Queensland University of Technology.
- Federal Constitution (2019), International Law Book Services, Selangor Darul Ehsan.
- Izanda, N. S. S., Samsudin S., & Zainuddin, M. (2020). Strata Title Reforms in Malaysia: A Review and Challenges of Regulatory and Governance Panacea. *European Journal and Molecular Medicine*, 7(8), 413-426
- JKPTG. (2020). Why does the owner need strata title? Department of Director General of Lands & Mines, Ministry of Energy & Natural Resources. <https://www.jkptg.gov.my/en/soalan-lazim-3/44-faq/hakmilik-strata/am/1056-why-does-owner-need-strata-title>
- Kamaruzzaman, S. N., Salleh, N. M., & Al Zawawi, S. A. F. (2010). Assessment on problems of issuances and transferences of Strata Title in Malaysia: The perception of the owner. COBRA 2010 - Construction, Building and Real Estate Research Conference of the Royal Institution of Chartered Surveyors.
- Maidin, A. J., Syed Abdul Kader, S. Z., Mobarak Ali, B. B., Mohamad, N. A., Sufian, A., Rosli, R. A, Md. Nor., F, (2008) Principles of Malaysian Land Law, Malayan Law Journal Sdn. Bhd, Selangor Darul Ehsan
- Mohsin, A., Zainudin, A. Z., Zamri, N. I., & Maarooof, N. N. (2020). Pelaksanaan Skim Pajakan Persendirian Hartanah Strata: Kajian Kes Medini, Johor. In *LAND* (Vol. 4, Issue 1, pp. 95–118). , Jabatan Ketua Pengarah Tanah & Galian Persekutuan.
- National House Buyer Association (2021, February 7th). What homebuyers should know about Private Lease Schemes (PLS). IProperty. Retrieved from <https://www.iproperty.com.my/news/private-lease-schemes-homebuyers/>
- National Land Code of 1965 [Act 828] (2019), International Law Book Services, Selangor Darul Ehsan
- Probate And Administration Act 1959 [Act 97] & Regulations (2019), International Law Book Services, Selangor Darul Ehsan.
- Siang, T.E., Ying, K.C., Seng, J.K.Q., (2015). Gated Community – Modern Lifestyle in Urban Area: Issues and Challenges on Legal Development in Peninsular Malaysia. *Malayan Law Journal*
- Shamsuddin, S., & Vale, L. J. (2017). Lease it or lose it? The implications of New York’s Land Lease Initiative for public housing preservation. *Urban Studies*, 54(1), 137–157. <https://doi.org/10.1177/0042098015614248>
- Small Estates (Distribution) Act 1955 [Act 98] and Regulation & Order (2020), International Law Book Services, Selangor Darul Ehsan.
- Strata Management Act 2013 [Act 757] (2016), International Law Book Services, Selangor Darul Ehsan.
- Strata Title Act 1985 [Act 318] (2017), International Law Book Services, Selangor Darul Ehsan.
- Teoh, T.L (2003). The issues of strata title development in Malaysia and Australia: a comparison for future direction. Master’s thesis, Universiti Teknologi Malaysia, Faculty of Geoinformation Science And Engineering.
- Town And Country Planning Act 1976 [Act 172] & Order (2020), International Law Book Services, Selangor Darul Ehsan.
- Trustee Act 1949 [Act 208]; Trustees (Incorporation) Act 1952 [Act] & Public Trust Corporation Act 1965 [Act 532] (2018), International Law Book Services, Selangor Darul Ehsan.

- Zainal, N. H., Samsudin, S., Md Azmi, F. A., & Amin, S. (2022a). Practicalities of Strata Lease Schemes in Malaysia. *Environment-Behaviour Proceedings Journal*, 7(19), 233–237. <https://doi.org/10.21834/ebpj.v7i19.3271>
- Zainal, N. H., Samsudin, S., Azmi, F. A. M., & Amin, S. (2022b). A Case Study of Strata Lease Schemes in Malaysia: Features and Uniqueness. *Environment-Behaviour Proceedings Journal*, 7(22), 95-102. <https://doi.org/10.21834/ebpj.v7i22.4138>
- Zainudin, A. Z., Abdullah, N., Yunus, N. M., Samsudin, S., Mustaffa, N. E., Radiaton, S., Zakaria, A., Afiqah, F., Azmi, M., Mohsin, A., & Ismail, D. N. (2022). Knowledge And Views Of Buyers And Property Management Agent On The Management Of Strata Private Lease Scheme. In *International Journal of Business and Economy (IJBEC)* (Vol. 4, Issue 2). <http://myjms.mohe.gov.my/index.php/ijbec>
- Zamri, N. I. (2019). *Skim Pajakan Persendirian Bagi Bangunan Strata Di Medini, Johor Bahru* (Vol. 1). Master's thesis, Universiti Teknologi Malaysia, Faculty of Built Environment And Surveying