

# Governing multi-occupancy buildings: learning from the international evidence base

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Dr Yu-Tung Wu

Dr Jenny Preece

University of Sheffield



**UK COLLABORATIVE  
CENTRE FOR  
HOUSING EVIDENCE**

## About the Author(s)

Dr Yu-Tung Wu is a Research Associate with the UK Collaborative Centre for Housing Evidence and a Research Associate in the School of Geography and Planning at the University of Sheffield.

Dr Jenny Preece is a Co-Investigator with the UK Collaborative Centre for Housing Evidence and a Senior Lecturer in the School of Geography and Planning at the University of Sheffield.

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# Executive Summary

1. This report is situated in the context of long-standing critiques of the leasehold system in England and Wales, which has been associated with unequal power relations, weak regulatory oversight, and continuing problems in the governance of residential property.
2. As **multi-occupancy buildings (MOBs)** become increasingly important within the housing system, and as commonhold returns to the policy agenda, international evidence on resident governance offers valuable lessons for improving the institutional design of commonhold in England and Wales.
3. The report aims to provide an evidence-based overview of the potential challenges facing the commonhold system and to identify important research gaps, with a target audience including governments, local councils, policymakers, researchers, and other stakeholders such as financial institutions.
4. Methodologically, the report adopts a systematic literature mapping approach, drawing primarily on Web of Science to identify research on the governance and management of MOBs. From an initial 1,714 search results, 74 sources were ultimately reviewed in full.
5. The review covers the full texts of 74 sources, including 68 academic articles published in 34 journals, 1 book chapter, and 5 grey literature sources.
6. The literature mapping shows that 72.6% of the reviewed sources were published during the past decade, with Housing Studies (11 sources) and Property Management (5 sources) as the two most represented publication venues; the literature spans housing studies, urban planning, law, sociology, management studies, and geography, and is concentrated mainly in Oceania, North America, and Western Europe, with Australia contributing the largest number of studies (31).
7. To present the evidence in a clear and policy-relevant way, the report organises the literature according to the life cycle of MOBs, distinguishing four stages: development, transition, operation, and termination.
8. The development stage refers to the planning, development, and construction of MOBs. Four themes are identified at this stage: design for mixed occupants, the initial layout/allocation/design of common facilities, building defects, and climate change adaptation measures, with the discussion emphasising how early design and construction decisions can create long-term governance consequences.
9. The transition stage refers to the transfer of management and control from developers to owners after construction, and the literature identifies two main themes: lack of transparency in sales and problematic developer legacies, both of which centre on information asymmetries and the ways developers may continue to shape governance after formal transfer.
10. The operation stage is the longest and most complex phase in the life cycle of MOBs, and the report presents it through five sub-sections: collective action challenges and owners' organisations, disputes, governance models, social interaction/lifestyle/community, and additional prominent issues.
11. The first sub-section, collective action challenges and owners' organisations, identifies nine themes: developer involvement, free-riding, management of collective funds, responsibilities and capacities of committees, power dynamics and knowledge differences among occupants, property management, professionalisation and commodification, juridification, and child welfare.
12. The second sub-section, disputes, contains two themes: the types, causes, and impacts of disputes, and dispute resolution procedures.
13. The third sub-section, governance models, identifies four themes: transformation of governance models, extended governance structures, mixed-use MOBs, and informal governance.
14. The fourth sub-section, social interaction, lifestyle, and community, comprises five themes: institutionalisation of neighbourhood relations, sense of belonging and community, low-income households, sense of security, and cultural diversity.
15. The fifth sub-section, additional prominent issues, brings together three cross-cutting themes that have received particular attention in the literature: the legal significance of ownership, the financialisation and market value of MOBs, and climate change adaptation and retrofit.
16. The termination stage refers to the final stage in the life cycle of MOBs before demolition and redevelopment, and four themes are identified: voting thresholds for termination and their impacts on owners, ownership and collective decision-making, impacts on non-owners, and implications for urban planning. The discussion focuses on the tension between collective redevelopment, individual property rights, displacement risks, and wider planning objectives.
17. Overall, the report concludes that MOB governance under dualistic ownership systems is shaped by the institutional complexity of hybrid ownership structures, vertically integrated buildings, collective action problems, and dependence on specialised knowledge and professional expertise.
18. Across the reviewed evidence, two underlying drivers repeatedly emerge: limited transparency of information and power asymmetries, both of which can increase the costs of

resident governance and create opportunities for exploitation or long-term governance failure.

19. The report also argues that MOBs under dualistic ownership systems are not inherently problematic; rather, the literature points to four broad policy directions for improving governance outcomes: enhancing transparency, strengthening training and support, reinforcing regulation, and clarifying legal frameworks.

20. Finally, the report identifies two research gaps of direct relevance to England and Wales: the need for more empirical research on everyday governance in mixed-ownership contexts involving both public and private actors, and the need for further investigation into how tenant participation might be more effectively incorporated into commonhold governance.

# Glossary of Key Definitions

Given that multi-occupancy buildings are understood and defined differently across countries and contexts, this section provides a clear delimitation of their physical development

form and ownership structure, defines two additional key terms, and clarifies the scope of meaning assigned to each throughout the report.

## Physical Development Form

The multi-occupancy buildings (MOBs) examined in this report fall within the broader category of multi-unit developments. The term “multi-unit” refers to developments composed of two or more residential properties and may include commercial or other non-residential properties (Easthope and Randolph, 2016: 1830). Multi-unit developments take a variety of forms. At the development scale, these include master-planned estates, retirement villages, gated communities, and

unit complexes, as well as apartment-based developments (Blakely and Snyder, 1999). In terms of building types, they encompass apartment buildings, house-lot subdivisions, duplexes, townhouses, and terrace housing (Harris, 2019). In this report, MOBs refer specifically to developments in which units are vertically attached within a single building structure, including mixed-use buildings where residential units coexist with commercial spaces.

## Ownership Structure

Multi-owned housing, in which residents collectively control and manage buildings and their associated common areas and shared facilities, can be distinguished in terms of ownership structure as either unitary or dualistic systems (Van der Merwe, 1994). In unitary systems, all owners jointly hold undivided shares of the land and all parts of the building, while each individual owner has the exclusive use of a specific lot within the building by virtue of their status as a co-owner. In dualistic systems, an owner holds individual ownership of a specific lot together with collective ownership of, and responsibility for, the common areas and parts of the development (Easthope and Randolph, 2016: 1830; Easthope et al., 2020: 2).

The commonhold system in England and Wales belongs to the dualistic model. Comparable ownership regimes exist in many other jurisdictions under different names, including *Ägarlägenheter* in Sweden, *condominio* in Italy, *condominiums* in Canada, Taiwan, and the US, *copropriété* in France, *sectional title* in South Africa, *strata title* in Australia and Singapore, and *Wohnungseigentum* in Germany (Easthope and Randolph, 2016; Easthope et al., 2020; Muczyński, 2023). These arrangements represent one of the most widespread forms of multi-owned housing property regimes globally (Lehavi, 2015: 7). Nevertheless, significant variation exists across jurisdictions in the detailed design of ownership systems, governance structures, and legal frameworks (Easthope et al., 2020: 2; Lehavi, 2015: 7).

Individual ownership within commonhold, strata title, or condominium regimes generally consists of three components: (1) ownership of an individual unit or lot, (2) co-ownership of the common areas and parts of the development, and (3) membership in an owners’ organisation (Van der Merwe, 2015). These components are defined through property titles and accompanying survey plans, which together establish a set of enforceable legal rights, responsibilities, and restrictions (Bennett et al., 2006). Blandy et al. (2006: 2366) conceptualise this configuration as a “bundle of rights,” referring to ‘all the various rights obtained by ownership of property,’ including five core rights: access, withdrawal, management, exclusion, and alienation (Schlager and Ostrom, 1992, cited in Donoso and Elsinga, 2018: 316). These rights are distributed and exercised among owners and other stakeholders within the governance framework of multi-owned housing (Blandy et al., 2006: 2371).

Common areas and parts of buildings typically include corridors, staircases, and elevators, as well as structural elements (e.g., floors, foundations, load-bearing walls, wall cavities). They also include external building components (e.g., roofs, facades), together with shared facilities (e.g., gardens, courtyards, service rooms, shared parking areas, security facilities, boundary walls, fences) (Falkenbach and Nuuja, 2007:11; Lehavi, 2015: 7; McKenzie, 2003: 205; Vergara et al., 2019: 4). However, the physical boundary between individual ownership and collective ownership is not fixed and may vary across different developments (Altmann, 2014: 441).

## Owners’ Organisation

Ownership of commonhold property also entails membership in a collective governing body. Typically, an owners’ organisation is established to coordinate the rights, responsibilities, and restrictions of property owners (Altmann,

2016: 263). In legal terms, such organisations commonly take the form of an association or a corporate entity, and in many jurisdictions their establishment is mandatory under statutory frameworks (Muczyński, 2023). The commonhold association

in England and Wales has equivalent institutional forms in other jurisdictions under different names, such as owners corporations in Australia, neighbourhood associations in South Korea, and homeowner associations in the US. These organisations generally perform three fundamental functions: (1) holding collective ownership of common property, (2) establishing rules that regulate behaviour within the neighbourhood, and (3) creating institutional arrangements for managing and controlling common property (Sherry, 2009). This report adopts the term “owners’ organisation” as a broad umbrella concept to encompass the diverse organisational arrangements observed in international cases, including both formal and informal, as well as more structured and loosely organised forms.

Owners’ organisations are responsible for maintaining common facilities and providing shared building services, such as security, cleaning of common areas, and waste management (Huong and Sajor, 2010: 25). They typically collect management and maintenance fees as well as insurance contributions, and often establish reserve funds to cover long-term maintenance costs (Levy et al., 2022: 1235; Webb and Webber, 2017: 54). Charges levied on owners are commonly calculated according to the size or relative value of each lot (Easthope and Randolph, 2016: 1838; Madsen et al., 2022: 2). Where payments are overdue, organisations may pursue recovery through legal procedures, as in Australia (see Easthope, 2015: 320), or through financial penalties, as in South

Korea (see Kim and Jang, 2017: 1158). In some jurisdictions, owners’ organisations may also engage in revenue-generating activities. For example, in Vietnam, condominium management committees may supplement operating budgets through advertising revenue from building walls or common areas, as well as rental income from commercial units within condominium developments (Huong and Sajor, 2010: 25).

Some governance responsibilities and financial administration are delegated to an executive committee, or to what is known in the US as a board of directors (Goodwin et al., 2020). Members of this committee are elected through democratic procedures among all owners. The committee, representing the collective interests of owners (hereinafter referred to as the committee), is composed of volunteer members and is granted the authority to implement collective decisions, enforce by-laws, and collect fees (Easthope and Randolph, 2009, 2016; Treffers and Lippert, 2020). Major decisions must usually be submitted to a vote among all owners and require a specified voting threshold to be reached (Webb and Webber, 2017). These voting arrangements are designed to balance the interests of different owners within collective decision-making processes (Barzel and Sass, 1990). In practice, management tasks that involve specialised expertise may also require the engagement of professional service providers, such as property managers, contractors, and legal professionals, to assist the committee (Levy et al., 2022; McKenzie, 2003).

## By-laws

By-laws are formal documents that regulate neighbourhood affairs, govern behaviour within the development, and safeguard common property (Easthope et al., 2014: 298; Kim and Jang, 2017: 1158). Their specific contents vary across different MOBs (Power, 2015: 250), but typically include the definition of the roles and responsibilities of the owners’ organisation and the committee, the expectations and rules applicable to owners and residents, and procedures for dispute resolution (Kim and Jang, 2017). Activities and behaviours commonly regulated through by-laws include the use of common property, pet ownership, waste disposal, the use and maintenance of shared environments, and the rental of units (Harris, 2019; Power, 2015).

By-laws are usually initially drafted by developers at the time of development. Owners retain the authority to amend existing rules or introduce new by-laws, although doing so often requires meeting specified voting thresholds (Easthope et al., 2014: 298). In some jurisdictions, if owners do not adopt their own by-laws, default model rules provided by the government may apply (Harris, 2019; Madsen et al., 2022).

# 1. Introduction

In England and Wales, calls for reform of the leasehold system have long been raised. Under leasehold tenure, a leaseholder shares proprietary interests with the freeholder, yet their rights are constrained by the terms of the lease contract with the freeholder (Robertson, 2006: 39). The operation of the leasehold system has been widely criticised on multiple grounds, including, but not limited to, the obstacles leaseholders face in exercising their statutory rights, high and escalating ground rents, limited regulatory oversight of managing agents, excessive charges levied by freeholders, and structurally unequal positions and power relations between freeholders and leaseholders (Law Commission, 2020: 4). The leasehold system has also posed challenges for the implementation of recent policy priorities, such as building safety (Preece and Flint, 2024) and building retrofit (Bright and Weatherall, 2017).

**Multi-occupancy buildings (MOBs)** (such as blocks of flats) represent a common and expanding form of housing development within the leasehold system. Following the Grenfell Tower fire and the wider building safety crisis, governance problems associated with leasehold arrangements in MOBs have become increasingly visible (Preece et al., 2024; Ward and Brill, 2024).

Long-standing deficiencies in the leasehold system prompted the introduction of the commonhold system in 2002 (Robertson, 2006), which was intended to grant leaseholders greater control and authority in the management of their homes. However, this alternative tenure arrangement,

which more closely aligns with international condominium governance models, has remained both limited in uptake and unfamiliar to the wider public. In England and Wales, fewer than 20 buildings currently operate under commonhold arrangements (DLUHC, 2023: 14). The government is now seeking to reinvigorate the move to commonhold and, on 27 January 2026, published the policy paper Draft Commonhold and Leasehold Reform Bill.

Nevertheless, replacing leasehold with commonhold cannot resolve all governance issues. Given the institutional and organisational complexity of MOBs, resident governance under commonhold continues to face a range of challenges (Bright and Weatherall, 2017). As England and Wales move toward a potential transformation of housing tenure arrangements, international experiences of resident governance in MOBs can constitute an important source of learning for improving institutional design.

In light of this context, this study conducts a rapid, systematic literature review of English-language academic research and grey literature published since 2000. The review focuses on how governance systems operate in practice, rather than examining only formal legislation and policy measures (Easthope et al., 2020: 4), to understand institutional dynamics and help identify key lessons for the governance and management of MOBs internationally. The review covers the full texts of 74 sources, including 68 academic articles published across 34 journals, 1 book chapter, and 5 grey literature reports.

## 1.1 Purposes of the Report

- This report aims to: (1) provide an evidence-based overview of the potential challenges facing an expanded commonhold system; and (2) identify areas where important research gaps remain.
- The report does not seek to review or reassess the problems associated with the leasehold system.
- The report is intended to support governments, local councils, and policymakers, as well as researchers working on housing governance and tenure reform. Other stakeholders who may require a deeper understanding of MOB management, including financial institutions involved

in mortgage lending and property finance, are also potential readers of this report.

- This report's insights into the governance of multi-occupancy buildings (MOBs) are applicable not only to (future) commonhold buildings and developments, but can also serve as a reference for non-commonhold buildings, including those managed by a Residents' Management Committee (alongside a freeholder) and/or those where residents have exercised the Right to Manage (and own the freehold).

## 1.2 Institutional Background to the Report

Since 1967, the leasehold system in England and Wales has undergone a series of reforms. For example, the Landlord and Tenant Act 1987 granted leaseholders, under specific conditions, the right to exercise pre-emptive purchase when the freehold of their block of flats is offered for sale; the Leasehold Reform, Housing and Urban Development Act 1993 introduced collective enfranchisement and granted

leaseholders an individual right to lease renewal (Robertson, 2006: 46–47). Other reforms include, but are not limited to, the Housing Act 1996 and the Commonhold and Leasehold Reform Act 2002, the latter of which introduced the Right to Manage (ibid.). In recent years, further legislative changes have been introduced through the Leasehold and Freehold Reform Act 2024.

Despite these reforms, the leasehold system has continued to face criticism because it does not resolve the fundamental tension between ownership rights and control over individual living spaces. In response, the Conservative government in 1996 proposed the creation of a new tenure system, known as commonhold. After a period of extensive consultation under

the subsequent Labour government, the new system was introduced through the Commonhold and Leasehold Reform Act 2002 and came into force in September 2004 (Robertson, 2006: 48). More recently, A Commonhold White Paper was released in March 2025, followed by the publication of the Draft Commonhold and Leasehold Reform Bill in January 2026.

## 1.3 Structure of the Report

The remainder of this report is organised into three main sections covering the methodology, the key themes identified in the literature, and the conclusion.

- **Methodology:** This section outlines the research design, the review steps undertaken, the mapping of the reviewed literature, and the limitations of the study.
- **Reviewed Themes and Topics:** Drawing on the life cycle of MOBs, this section examines the main challenges, key learning, and proposed policy recommendations made by

international research across four stages of development and governance.

- **Conclusion:** The final section summarises the key themes identified in the review and highlights research gaps that require further investigation in future studies.

# 2. Methodology

## 2.1 Research Approach

This study draws on the systematic literature mapping method developed by researchers at the UK Collaborative Centre for Housing Evidence (CaCHE) (Soaita et al., 2020). This approach is particularly suited to broad research questions with a defined exploratory direction, where the objective is to assess existing evidence in order to inform policymaking and professional practice. It has considerable potential for identifying emerging research agendas and documenting knowledge gaps, and can also serve as a preliminary stage for more robust systematic reviews (ibid.).

The purpose of this study is to explore and synthesise interdisciplinary understandings of the governance and management of MOBs based on international discussion. Given the constraints of available research resources, with two researchers conducting the review and screening process within a six-week period, with the second researcher joining during the final two weeks, the database “Web of Science” was selected as the primary search platform. This database provides extensive coverage and is widely recognised as one of the key databases in housing research (Serin, 2018; Soaita et al., 2020).

Prior to initiating the review process, key inclusion and exclusion criteria were established. These criteria informed both the selection of search keywords and the screening procedures applied during the review.

■ Inclusion criteria: Given the rapid growth in both the

number and proportion of MOBs over the past two decades (Bright and Weatherall, 2017; Troy et al., 2015), housing issues and policy discussions related to MOBs are likely to become increasingly prominent. Accordingly, the search scope was limited to literature published from 2000 onwards. No geographical restrictions were imposed in order to capture international experiences. In terms of language, only English-language publications were included, as these could be read by both participating researchers. The search primarily focused on academic publications, including (1) journal articles, (2) early access publications, (3) empirically oriented book chapters, and (4) review articles.

■ Exclusion criteria: The review excluded housing research in which MOBs were not the primary focus of analysis, even if they were mentioned in the broader discussion. In addition, as the objective of this study is to understand the current state of research in a structured and comparable way, full-length books were excluded. Grey literature was also excluded from the initial search process. Such materials often include reports, presentations, legal documents, and policy papers, and are frequently published in the native languages of their respective countries (see Serin, 2023: 7). Given the language capabilities of the researchers and the limited research resources available, excluding grey literature also helped avoid potential language bias that might arise from selectively including only English-language grey publications.

## 2.2 Review and Evidence Synthesis Procedures

This project involved four steps and was conducted over a five-month period, spanning March 2025 and November 2025 to March 2026. The search and screening processes were carried out throughout March 2025 and during the first two

weeks of November 2025. Following this, the 74 selected sources were read in full and coded, after which the present report was prepared.

### Step 1: Search strategy

After establishing the inclusion and exclusion criteria described above, searches were conducted in the Web of Science database using title and abstract searches. The keywords used in the topic search were selected based on the researchers’ expertise and experience in housing research. An initial set of keywords was first applied in an exploratory search phase. Given that institutional and legal arrangements related to MOBs are described using different terminology across jurisdictions, additional keywords were subsequently incorporated in order to maintain a sufficiently broad Boolean search string (see Soaita et al., 2020). The Boolean search string used in this study was as follows:

(leasehold\* OR commonhold OR strata OR multi-occupan\* OR multi-household OR condo\* OR “resident management company” OR rmc OR tenement) AND (govern\* OR self-govern\* OR manage\*) AND (flat\* OR apartment\* OR development\* OR building\*)

## Step 2: Screening process

After removing duplicate records, a total of 1,714 results were obtained. These were exported to Microsoft Excel for screening and data cleaning, where sources unrelated to the research focus were excluded (Soaita et al., 2020: 329). A total of 1,625 sources were excluded during the title screening stage. The abstracts of the remaining 89 sources were then entered into a database created in Microsoft Excel and subjected to a second round of screening based on abstracts, which resulted in the exclusion of a further 25 sources. During the full-text

retrieval stage, an additional 9 sources were excluded. 5 could not be accessed through the University of Sheffield online library. 3 had English titles and abstracts but the full texts were not written in English. 1 was a full-length book publication. As a result, 55 sources remained, consisting of 54 journal articles and 1 book chapter.

## Step 3: Manual inclusion of additional sources

Following an initial reading of 21 full-text sources, 14 additional sources were manually identified and added. These consisted of 13 journal articles and 1 review article. In addition, the researchers included 5 grey literature sources based on their knowledge in order to support a broader understanding of international cases. This was considered necessary because journal articles are often constrained by word limits and may

provide limited background information on institutional and legal contexts. These 19 manually added sources were directly relevant to the objectives of the study but had not appeared in the initial search results.

## Step 4: Coding and synthesis

In total, the researchers read the full texts of 74 sources and coded them using Microsoft Excel. For each source, information was recorded on publication year, geographical scope, research methods, research focus, theoretical and conceptual framework, literature review, research context,

and key findings. This structured dataset supported the subsequent synthesis of evidence and the preparation of this report.

# 2.3 Mapping the Literature

## Temporal trends and source distribution

The mapping results indicate that publications on the governance of MOBs have gradually increased since 2000. Figure 1 shows that 72.6% of the reviewed publications were published during the past decade (2015–2024)<sup>1</sup>. These sources were published across 39 different publication outlets (Figure 2). The journal *Housing Studies* accounts for the largest share, contributing 11 sources. The second most represented publication venue is *Property Management*, which contributes 5 sources. These are followed by *Urban Studies*, *Habitat*

*International*, and *Journal of Urban Affairs*, each of which published 4 articles included in the review. The diversity of journals and publication outlets indicates that discussions of MOB governance span multiple academic fields. These include housing studies, urban planning, law, sociology, management studies, and geography.

## Geographical distribution

The geographical distribution refers to the countries or regions in which the topics discussed in each source are situated, rather than the institutional affiliation or location of the authors. If a study compares cases in Canada and Australia, both countries are recorded once. As a result, the total count of geographical references exceeds the total number of sources.

The reviewed studies cover 25 countries or regions (Table 1). Among these, the most frequently examined countries are Australia (31), the UK (12), Canada (8), and the US (8). Together, these account for 66.3% of the geographical references (Figure 3). When aggregated by continental region, studies focusing on Oceania (34), North America (16), Western Europe (13), and Asia (mainly East and Southeast Asia) (12), together represent

<sup>1</sup> The number of sources published in 2025 is not included here, as our search was conducted up to March 2025 and therefore does not capture the full dataset for that year.

84.3% of the total.

housing institutions, Australia occupies a dominant position in the literature within this field.

These results indicate a pronounced geographical imbalance in the existing English-language literature on MOB governance. This imbalance exists not only between English-speaking and non-English-speaking countries but also within English-speaking contexts themselves. As one of the pioneering jurisdictions in the development of multi-owned

Figure 1

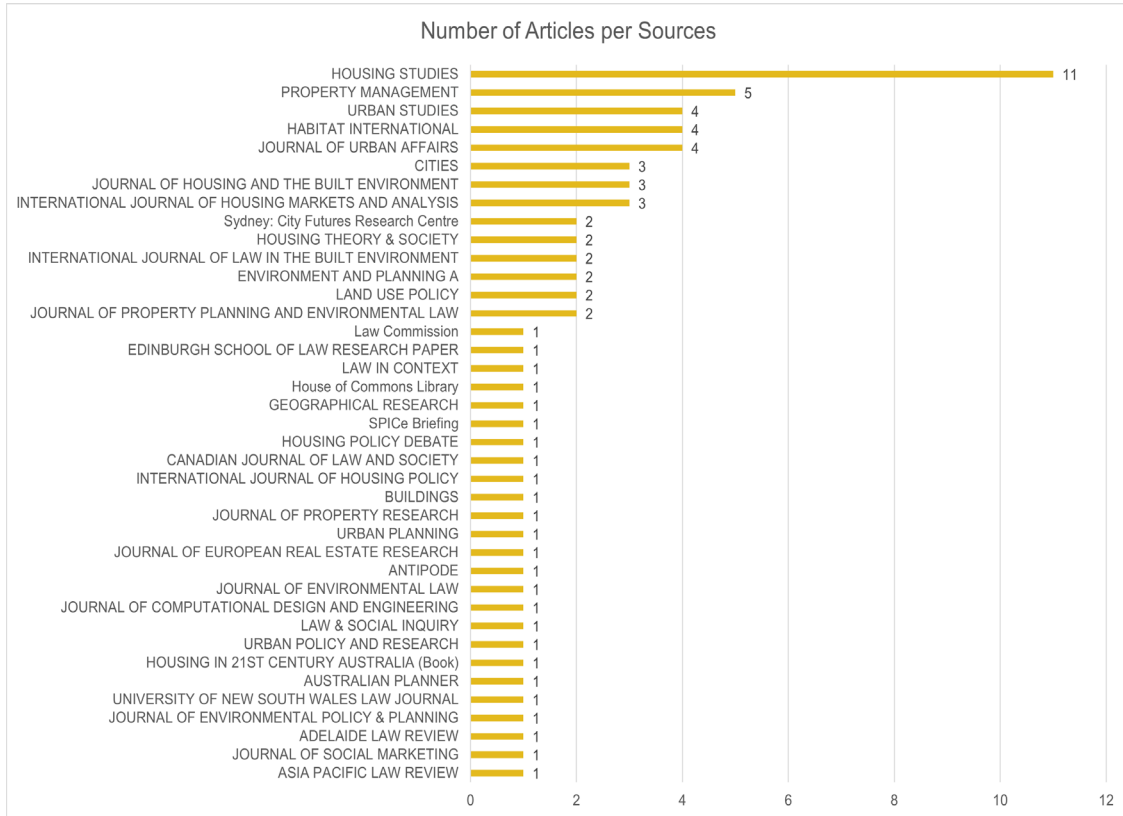


Figure 2

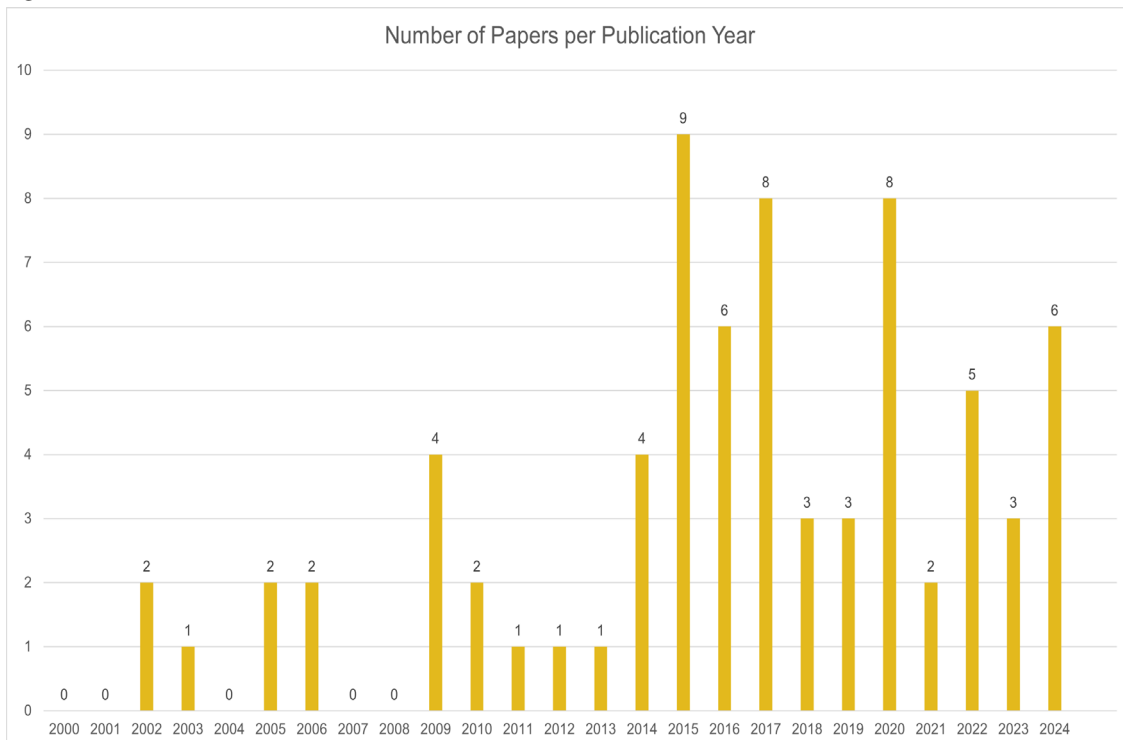


Figure 3

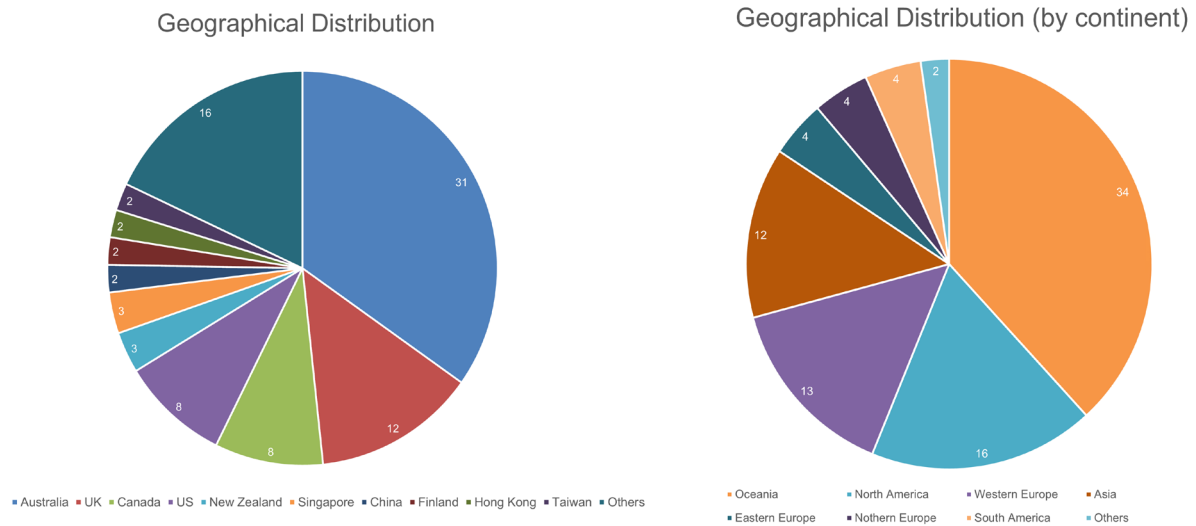


Table 1

Country (Region)	Count	Continent Category
Australia	31	Oceania
UK	12	Western Europe
Canada	8	North America
US	8	North America
New Zealand	3	Oceania
Singapore	3	Asia
China	2	Asia
Finland	2	Northern Europe
Hong Kong	2	Asia
Taiwan	2	Asia
Albania	1	Eastern Europe
Brazil	1	South America
Chile	1	South America
Colombia	1	South America
Denmark	1	Northern Europe
Ecuador	1	South America
Ireland	1	Western Europe
Japan	1	Asia
Poland	1	Eastern Europe
Russia	1	Eastern Europe
Slovenia	1	Eastern Europe
South Africa	1	Africa (Others)
South Korea	1	Asia
Sweden	1	Northern Europe
Vietnam	1	Asia
NA <sup>2</sup>	1	NA (Others)

<sup>2</sup> This is a journal article conducting a critical literature review and therefore does not specify a geographical scope (Liu et al., 2018).

## 2.4 Research Challenges and Limitations

First, Soaita et al. (2020: 334) note the challenges associated with screening literature based solely on titles and abstracts in housing research. Unlike some other disciplines, housing research does not follow a highly standardised abstract structure, and authors often adopt different styles when summarising their studies. As a result, given the limited time available for screening, some relevant sources may have been overlooked if their titles or abstracts did not clearly indicate their relevance to the focus of this report.

Second, due to constraints in time and research resources, this review relied on a single database, Web of Science. This may have resulted in some relevant publications not being captured in the search results. However, this limitation does not undermine the overall purpose of the report, which is to improve understanding of the practical governance challenges associated with MOBs and to identify areas that have received relatively limited scholarly attention.

Third, good practice in systematic reviews typically recommends that screening be conducted independently by

two reviewers in order to minimise potential bias (Greenhalgh et al., 2005; Lee et al., 2015). Due to limited research resources, the initial stages of the review and screening process were conducted by a single researcher. Nevertheless, efforts were made to maintain a neutral and consistent approach to evaluating and selecting sources, and the procedures followed at each stage of the review were clearly documented.

Fourth, a substantial proportion of the sources included in the review are based on research conducted in Australia. Consequently, the themes identified in the subsequent analysis of MOB governance inevitably reflect Australian experiences to a significant degree, followed by those from North America. These experiences may not always be directly transferable to the institutional context of commonhold in England and Wales. However, the underlying causes of the governance challenges identified, as well as the strategies adopted by residents, scholars, and governments in response to them, still provide valuable insights for policy development and institutional learning.

# 3. Reviewed Themes and Topics

The sources reviewed in this study cover a wide range of topics, reflecting the inherent complexity of governance in MOBs. The vertical configuration of residential space, the division of property rights, and the presence of multiple stakeholders together proliferate a variety of governance challenges. The coexistence of public and private property rights, combined with the frequent incorporation of market-based services, places MOBs at the intersection of the state, civil society, and the market (McKenzie, 2003). This institutional configuration often involves conflicts and divergent motivations among multiple stakeholders (Chen and Webster, 2005; Easthope et al., 2014; Easthope, 2015). These stakeholders include developers, regulators (government authorities), operational bodies (owners' organisations), and various categories of owners and occupants (investors, owner-occupiers, private and social tenants, non-resident owners, tourists, short-term tenants, and commercial occupants).

Other relevant actors include service providers (architects, contractors, lawyers, real estate agents, and property managers), as well as visitors and pedestrians (Easthope et al., 2014: 294; Easthope and Randolph, 2016: 1831; Gao, 2015: 317; Harris, 2019).

Given this complexity, this section draws on the framework adopted by Easthope et al. (2014) and organises the reviewed topics according to four stages in the life cycle of multi-title developments: development, transition, operation, and termination. Each stage encompasses a number of key themes<sup>3</sup> (Table 2). This structure aims to present the potential challenges and considerations of MOB governance in a clearer chronological sequence, while also providing a comprehensive overview of the governance dynamics of MOBs.

**Table 2: Identified themes across the life cycle stages**

Stage	Themes
Stage 1: Development	Theme 1: Design for mixed occupants Theme 2: Initial layout, allocation, and design of common facilities Theme 3: Building defects Theme 4: Climate change adaptation measures
Stage 2: Transition	Theme 5: Lack of transparency in sales Theme 6: Problematic developer legacies
Stage 3: Operation	<p><b>Collective action challenges and owners' organisations</b></p> <p>Theme 7: Developer involvement Theme 8: Free-riding Theme 9: Management of collective funds Theme 10: Responsibilities and capacities of committees Theme 11: Power dynamics and knowledge differences among occupants Theme 12: Property management Theme 13: Professionalisation and commodification Theme 14: Juridification Theme 15: Child welfare</p> <p><b>Disputes</b></p> <p>Theme 16: Types, causes, and impacts of disputes Theme 17: Dispute resolution procedures</p> <p><b>Governance models</b></p> <p>Theme 18: Transformation of governance models Theme 19: Extended governance structures Theme 20: Mixed-use MOBs Theme 21: Informal governance</p> <p><b>Social interaction, lifestyle, and community</b></p> <p>Theme 22: Institutionalisation of neighbourhood relations Theme 23: Sense of belonging and community Theme 24: Low-income households Theme 25: Sense of security Theme 26: Cultural diversity</p> <p><b>Additional prominent issues</b></p> <p>Theme 27: The legal significance of ownership Theme 28: The financialisation and market value of MOBs Theme 29: Climate change adaptation and retrofit</p>
Stage 4: Termination	Theme 30: Voting thresholds for termination and their impacts on owners Theme 31: Ownership and collective decision-making Theme 32: Impacts on non-owners Theme 33: Implications for urban planning

<sup>3</sup> To control the length of this report, the subsequent themes do not list every source and piece of evidence associated with each theme. The sources discussed within each theme are those that the researchers consider to be the most representative and informative.

## 3.1 Stage 1: Development

Stage 1 refers to the planning, development, and construction of MOBs (Easthope et al., 2014: 293). In most cases, this stage attracts relatively limited attention because residents, who are the eventual users of the buildings, are typically not involved in the process. However, decisions made during this stage often have long-lasting consequences throughout the entire life cycle of MOBs. For example, well-designed private living spaces together with appropriate neighbourhood facilities and services can foster a sense of home and strengthen social interaction among residents (Easthope et al., 2022: 223; Reid, 2015: 447). Conversely, the negative impacts of poor design may persist over long periods (Easthope et al., 2014: 294). A review of international experiences identifies four key themes at this stage:

- (1) Design for mixed occupants
- (2) Initial layout, allocation, and design of common facilities
- (3) Building defects
- (4) Climate change adaptation measures

### Theme 1: Design for mixed occupants

Yip and Forrest (2002: 715) describe mixed-use buildings in Hong Kong in which commercial premises are located on the ground floor. The lack of separate entrances in the design has led to conflicts between residential owners and commercial tenants. Similar evidence is reported in research conducted in Australia (Easthope and Randolph, 2016: 1835). Where building services are not adapted to the different operational and lifestyle needs of residential and commercial occupants, difficulties in management and maintenance may arise, often leading to disputes over the allocation and use of shared funds. Such conflicts may involve issues such as gas consumption, elevator maintenance, and the upgrading and upkeep of building lobbies.

Van den Nouwelant and Randolph (2016) examine buildings that combine market housing with subsidised housing. They argue that building design should follow the principle of “tenure blindness,” whereby the two forms of housing are integrated unit by unit within the same development. This approach reduces the visibility of subsidised housing and helps prevent its identification within the building. At the same time, maintaining consistency in architectural design and the quality of shared facilities can help reduce social stigma while also protecting the market value of properties. However, facilities and services have implications for building service charges, which can impact on affordability.

### Theme 2: Initial layout, allocation, and design of common facilities

Research conducted in Australia shows that disputes related to the layout, allocation, and design of common facilities are an important source of conflict within MOBs (Shin et al., 2021). Ambiguous boundaries of shared spaces or poor accessibility

to facilities can generate dissatisfaction among owners, particularly when they remain responsible for costs associated with facilities that they cannot easily use. For example, unclear allocation or inadequate spatial design may lead to shortages of parking or storage spaces, or make them inconvenient to use (ibid.: 9).

### Theme 3: Building defects

During the construction phase, developers may choose materials, design solutions, or construction practices that reduce costs or accelerate project completion. Although the consequences of such decisions may not be immediately visible at the time of completion, their impacts can gradually emerge over time and generate persistent problems. Webb and Webber (2017: 53) describe these long-term consequences as “lock-in effects.” For example, an interview with a planner in Toronto, Canada, indicated that the installation of faster window-wall systems involves a large number of joints and relies on caulking and tape, which increases the risk of cracking and water damage in the future (ibid.). Altmann (2014: 446) documents a case in Australia in which developers installed only a limited number of water metres in order to reduce construction costs. This decision later created complex management and billing problems. Other common defects observed in MOBs include elevator and air-conditioning failures, balcony defects, electrical malfunctions, structural cracks, and problems related to fire and safety compliance (Easthope et al., 2009).

Lock-in effects can create ongoing management and maintenance difficulties and increase operating costs, which are ultimately transferred to owners. They may also generate disputes among stakeholders regarding responsibility for repairs and maintenance. These problems can impose significant financial burdens on owners and may lead to shortages in collective maintenance funds, potentially creating a cycle of deteriorating maintenance conditions (Altmann, 2014; Easthope and Randolph, 2016). In some cases, such situations may eventually require financial intervention from governments (Webb and Webber, 2017: 54).

### Theme 4: Climate change adaptation measures

An investigation conducted in Australia indicates that many respondents consider the most effective way to improve the resilience of MOBs to extreme weather conditions is through measures implemented during the construction phase, placing responsibility on developers (Guilding et al., 2015). Strengthening climate resilience in both building design and neighbourhood infrastructure at the outset can significantly improve long-term adaptability. In contrast, inadequate building design may lead to higher long-term energy consumption and increased operating costs (Altmann, 2014: 453). Compared with retrofitting buildings or remedying defects after construction, incorporating climate resilience during the development stage is generally more cost-effective for residents. However, implementing such measures in practice may be challenging, as developers are often

more concerned with profitability than with the long-term performance of MOBs (Easthope et al., 2014).

Taken together, these four themes demonstrate that decisions made by developers during the development stage can have long-lasting impacts on the governance of MOBs. Many of these issues could potentially be avoided (Easthope and Randolph, 2016). Developers may lack awareness of the long-term governance implications of their decisions or may lack incentives to address them (ibid.: 1841). Additional incentive

## 3.2 Stage 2: Transition

Stage 2 refers to the process through which the management and control of MOBs are transferred from developers to owners after construction has been completed and approved (Easthope et al., 2014: 294–295). Two main themes are identified in the literature:

- (1) Lack of transparency in sales
- (2) Problematic developer legacies

### Theme 5: Lack of transparency in sales

Research conducted in Australia finds that sales agents representing some developers failed to disclose to prospective residential buyers that the MOB development included units intended for holiday rentals (Fisher and McPhail, 2014). Purchasers who believed they were buying into a residential development later discovered that holiday rental units had been incorporated into the project as part of the developer's strategy to secure project financing and obtain more favourable lending conditions. This discrepancy between buyer expectations and the actual structure of the development often resulted in disputes after occupation.

Another form of sales opacity involves setting artificially low management fees during the initial sales period. Evidence from Australia and Canada suggests that developers sometimes advertise lower monthly management fees in order to make units more attractive to potential buyers. However, these initial fees are often insufficient to cover the actual costs of building management and maintenance. As a result, owners may later face substantial increases in management fees once the development becomes fully operational (Easthope, 2015: 320; Lippert and Steckle, 2016: 138). The longer such artificially suppressed fees remain in place, the greater the financial difficulties that may arise due to accumulated deficits (Easthope et al., 2014: 295).

In addition, owners may not fully understand the governance arrangements associated with the MOB in which they purchase a unit. In principle, purchasers should ensure that they understand these arrangements before signing the purchase contract. In practice, however, disclosure statements are often lengthy documents and are sometimes provided late in the purchasing process and may undergo multiple revisions. Consequently, even purchasers' legal representatives, who review the documents primarily for legal compliance, may be unaware of the commitments or representations

mechanisms may therefore be necessary. Easthope and Randolph (2016: 1842–1843) propose two policy measures: (1) encouraging developers to disclose life-cycle cost information and (2) establishing government-maintained publicly accessible registers that identify poor-performing developers while recognising those with good practices. Such measures could provide potential homebuyers and owners, who often face information asymmetries and professional barriers, with reliable information to support informed market choices.

made by developers during earlier stages of the sales process (Fisher and McPhail, 2014: 795).

### Theme 6: Problematic developer legacies

Before a sufficient number of lots have been sold, developers typically hold the majority of units and therefore dominate the owners' organisation and the elected committee. This position allows developers to influence committee decisions in ways that may serve their own interests during the transition stage (Treffers and Lippert, 2024: 1437). Although not all developers engage in such practices, evidence from North America and Australia suggests that they are not uncommon (see Easthope and Randolph, 2016; Treffers and Lippert, 2024), and similar patterns have also been observed in China (see Chen, 2024).

Developers commonly maintain influence over MOB governance through three mechanisms: (1) the imposition of contracts, (2) the drafting of by-laws, and (3) the retention of ownership over certain lots or assets. These strategies can enable developers to continue extracting profits from the development even after the formal transition of governance has occurred.

The first mechanism involves developers influencing committees to sign long-term and often costly contracts with property management companies or service providers that are closely associated with the developer or controlled by individuals connected to them. These contracts may cover services such as recreational facility maintenance, cleaning services, and landscaping (Altmann, 2016: 265; Chen, 2024: 28; Easthope and Randolph, 2016: 1840; Treffers and Lippert, 2024: 1437–1440; Yip and Forrest, 2002: 713). In some cases, developers may have joint business arrangements with these service providers or may belong to the same corporate group (Lippert and Steckle, 2016: 136; Treffers and Lippert, 2024: 1439). Another example can be found in Queensland, Australia, where caretaker contracts selected by developers may extend for up to 25 years (Fisher and McPhail, 2014: 791). Such arrangements may leave owners bound by contracts that are not necessarily in their best interests once they have purchased their units (Treffers and Lippert, 2024).

The second mechanism involves the drafting of by-laws. Developers who retain control during the transition stage may have considerable influence over the formulation of by-laws. In some cases, these rules may include provisions that

disadvantage future resident governance. For example, one interview case in Canada described a development where the developer limited the committee to three members through the by-laws, thereby restricting the scope for democratic governance within the MOB. Subsequent owners found it difficult to amend these rules because collective decisions typically require both sufficient participation and a specified voting threshold (Lippert and Steckle, 2016: 136).

The third mechanism involves the developers retaining ownership of some units in order to continue participating in the collective governance of the owners' organisation and maintain influence over decision-making processes (Easthope and Randolph, 2009: 250; 2016: 1839). In other cases, developers may retain ownership of commercial facilities within the development and charge residents for their use, or maintain ownership of utility metres and charge residents rental fees (Treffers and Lippert, 2024: 1439). However, the decision to retain ownership is often influenced by flexible profit strategies. In periods of rapid growth in the property market, developers may choose to sell these assets quickly in

order to realise capital gains (Coiacetto, 2010; Rosen, 2017).

Arrangements related to building management and service provision often involve complex technical and legal considerations, making them difficult and time-consuming for owners to address. Developers who establish such arrangements before the transition stage may create a sense of convenience for early residents who move in after construction. However, this convenience may conceal problems that have not yet emerged or been recognised. The embedded developer-manipulated governance structures and contractual arrangements may continue to shape the operation of the MOB as property ownership is transferred among successive owners. Together, these two themes highlight the significant information asymmetry between developers and owners during the transition stage. To address this issue, Treffers and Lippert (2024: 1445) suggest that governments should strengthen regulatory oversight during the transition phase, while Levy et al. (2022: 1234) recommend introducing clearer disclosure requirements during the property sales process.

### 3.3 Stage 3: Operation

Stage 3 represents the core phase of the MOB life cycle and is typically the longest stage in duration. Because the topics involved are highly diverse, this report divides the operation stage into 5 thematic parts comprising 23 themes in total. This structure is intended to capture the breadth of existing discussions and current understandings in the literature. The five parts are: (1) collective action challenges and owners'

organisations, (2) disputes, (3) governance models, and (4) social interaction, lifestyle, and community, with the fifth part including three additional cross-cutting themes that have received significant attention in the literature: the legal significance of ownership, the financialisation and market value of MOBs, and climate change adaptation and retrofit.

*Table 3: Key themes in the operation stage*

<p><b>Collective action challenges and owners' organisations</b></p> <p>Theme 7: Developer involvement  Theme 8: Free-riding  Theme 9: Management of collective funds  Theme 10: Responsibilities and capacities of committees  Theme 11: Power dynamics and knowledge differences among occupants  Theme 12: Property management  Theme 13: Professionalisation and commodification  Theme 14: Juridification  Theme 15: Child welfare</p>
<p><b>Disputes</b></p> <p>Theme 16: Types, causes, and impacts of disputes  Theme 17: Dispute resolution procedures</p>
<p><b>Governance models</b></p> <p>Theme 18: Transformation of governance models  Theme 19: Extended governance structures  Theme 20: Mixed-use MOBs  Theme 21: Informal governance</p>
<p><b>Social interaction, lifestyle, and community</b></p> <p>Theme 22: Institutionalisation of neighbourhood relations  Theme 23: Sense of belonging and community  Theme 24: Low-income households  Theme 25: Sense of security  Theme 26: Cultural diversity</p>
<p><b>Additional prominent issues</b></p> <p>Theme 27: The legal significance of ownership  Theme 28: The financialisation and market value of MOBs  Theme 29: Climate change adaptation and retrofit</p>

# Collective action challenges and owners' organisations

The first part contains 9 themes that address the governance challenges associated with collective action and the functioning of owners' organisations. Collective action lies at the centre of MOB governance during this stage and operates across three main dimensions: (1) the maintenance of common areas in order to prevent the emergence of the tragedy of the commons, (2) the provision of shared services and goods, which require collective decision-making and joint efforts in terms of financing and implementation, and (3) the coordination of individual behaviour and the use of units, taking into account the interdependence created by neighbouring dwellings, shared building structures, and common spaces (Gao, 2015; Power, 2015). These three dimensions generate a range of obstacles and conflicts that have been widely examined in both UK and international research. The ownership structure and physical form of MOBs, together with the presence of multiple stakeholders with diverse interests and objectives, make the coordination of collective action a complex and often challenging process. The 9 themes discussed in the literature include the following:

- (1) Developer involvement
- (2) Free-riding
- (3) Management of collective funds
- (4) Responsibilities and capacities of committees
- (5) Power dynamics and knowledge differences among occupants
- (6) Property management
- (7) Professionalisation and commodification
- (8) Juridification
- (9) Child welfare

## Theme 7: Developer involvement

Several studies examine how developers continue to exert influence over MOB governance after embedding control mechanisms into the governance structure during earlier stages (see Theme 6). These mechanisms allow developers to extract additional profits or reduce the risk of financial losses. Evidence from Australia indicates that developers may strengthen their influence by holding proxy voting rights of absentee owners. Through this influence, developers may control financial decisions and selectively allocate funds to certain purposes or withhold them from others. Practices may include withholding tax payments, resisting investment in building maintenance, or maintaining insufficient insurance coverage (Easthope and Randolph, 2016: 1839). In cases observed in North America and Australia, committees or property management companies that are influenced by developers or maintain close relationships with them may act in ways that protect the developers' interests. Such actors may conceal building defects, delay investigations, or postpone necessary repairs in order to avoid warranty claims during the construction defect liability period (Easthope and Randolph, 2016: 1839–1840; Treffers and Lippert, 2024: 1437). These practices can result in financial losses for owners.

For owners seeking to reform such arrangements, the quorum requirements become barriers limiting the ability of owners to amend by-laws or implement reforms, weakening owners' motivation to participate in collective action and undermining their sense of belonging and identification with the MOB community (Yip and Forrest, 2002: 713). If owners choose to pursue legal action to resolve such issues, they may face substantial financial, temporal, and psychological burdens, with no guarantee of a successful outcome (Treffers and Lippert, 2024: 1441).

In response to these challenges, some jurisdictions have introduced institutional measures to limit developers' influence. For example, in the Australian state of New South Wales, proxy voting rights are restricted to a maximum period of 12 months or 2 consecutive annual general meetings in order to prevent developers from exercising long-term control over decision-making through proxy votes (Easthope and Randolph, 2009: 253). Chen (2024: 30) also suggests lowering the voting thresholds required for collective decisions in order to strengthen owners' capacity to exercise governance authority.

## Theme 8: Free-riding

The free-rider effect refers to situations in which individuals benefit from goods or services provided by others without contributing themselves. When individuals cannot be excluded from shared benefits, they may lack incentives to participate in collective efforts and instead prefer to free-ride on the contributions of others (Gao, 2015). If such behaviour becomes widespread, collective benefits may fail to materialise (Olson, 1965; Ostrom, 1990).

In the context of MOB governance, residents may be unwilling to participate in collective affairs or refuse to assume responsibilities, for example by failing to pay management fees or by refusing to attend meetings (De Camargo Cavalheiro and Abiko, 2023: 422; Donoso and Elsinga, 2018: 314; Lehavi, 2015: 33). This pattern has been widely observed in MOB governance across different countries (Hsieh, 2009: 76; McGuirk and Dowling, 2011: 2621; Reid et al., 2017: 453; Webb and Webber, 2017: 54).

Several studies examine measures that may encourage collective action. A range of mechanisms have been implemented to promote participation, including selective incentives (government subsidies or reward and penalty systems), efforts to strengthen community ties and social interaction, and mandatory interventions by public authorities or supervisory bodies (Muczyński, 2023: 2109–2110; Yip and Forrest, 2002: 710). These measures are not mutually exclusive and may be implemented simultaneously. One of the most common approaches is the establishment of a central coordinating body within the MOB, such as an elected committee, to organise and promote collective action (Muczyński, 2023).

Evidence suggests that collective action can be effectively mobilised when a small number of committed volunteers

assume leadership roles and coordinate community efforts (see Chen, 2024: 25; Lehavi, 2015: 23, 33; Vergara et al., 2019: 15–16). However, this approach also involves potential risks and uncertainties. For example, owners' organisations may become dominated by small groups, leading to oligarchic decision-making that prioritises the interests of a minority rather than those of the broader community (Muczyński, 2023; Yip and Forrest, 2002). In other cases, very few residents may be willing to volunteer for governance roles. Chen and Webster (2005: 207), for example, describe the difficulties of establishing owners' organisations in Taiwan and Hong Kong. In Taiwan, when no residents volunteer to serve on committees, some neighbourhoods have resorted to selecting committee members through lottery systems (Chin, 2002).

Other studies investigate the conditions under which residents may become more willing to participate in governance and collective action despite general levels of apathy. Marshall et al. (2018) and Vergara D'Alençon (2018) find that participation may be triggered when individual interests are threatened or when residents wish to raise complaints about building maintenance; Yau (2012) finds that neighbourhoods with stronger group cohesion may exhibit higher levels of owner participation.

### **Theme 9: Management of collective funds**

The establishment, maintenance, and use of collective funds represent one of the central concerns in international discussions of MOB governance. Collective funds derive from several sources, including (regular) payments from owners, grants provided by national or local authorities, and financing obtained by owners' organisations (Lujanen, 2010: 181–182). In Australia, collective funds are usually divided into two categories: an administrative fund and a maintenance fund. The administrative fund covers routine operational expenses, such as insurance, property management fees, and utilities for common areas, while the maintenance fund is intended for non-recurring capital expenditures (Easthope et al., 2014: 297). One of the most frequently observed challenges is the shortage of collective funds, which has been reported in multiple jurisdictions (De Camargo Cavalheiro and Abiko, 2023; Easthope, 2015; Goodwin et al., 2020; Lippert and Steckle, 2016). Several factors contribute to this problem, including owners' refusal or delay in making payments, the absence of long-term financial planning (Easthope, 2015: 322), and unexpected major expenditures, such as building repairs.

In some jurisdictions, regulations require the preparation of a sinking fund plan and the collection of fees from owners to maintain an adequate reserve fund. For example, since 2005 the Australian state of New South Wales has required a ten-year sinking fund plan. However, this requirement has not always been strictly enforced (Easthope and Randolph, 2009: 250). When insufficient reserve funds coincide with major expenditures, the resulting increases in regular payments may become difficult for some owners to afford (Webb and Webber, 2017: 54). Additional challenges arise from differences among owners in terms of their identities and perceptions. Disagreements may occur regarding the prioritisation of

expenditures, and questions of fairness may emerge when current owners are required to address funding shortfalls resulting from the actions or inaction of previous owners (Easthope et al., 2014: 297).

Based on evidence from Australia and Chile, Easthope (2015: 323) and Vergara et al. (2019: 17) propose similar recommendations. They suggest that guidance or training should be provided to committee members and owners regarding the management and use of collective funds in order to help maintain adequate reserve levels.

Some studies also examine financing mechanisms used by MOBs, particularly in relation to major repairs of common parts. Because the benefits of major repairs extend over a long period, their costs are often considered suitable for distribution over longer time horizons, while reserve funds may continue to cover smaller maintenance expenses (Lujanen, 2010). Lujanen (2010) compares the mortgage arrangements, decision-making procedures, and fee structures associated with three ownership frameworks: unitary systems, dualistic systems, and the Finnish housing company system.

### **Theme 10: Responsibilities and capacities of committees**

The reviewed literature highlights two main aspects related to committees: (1) the management capacity of committee members and (2) the imbalance of power between committees and other owners.

First, as discussed in Theme 8, the effective functioning of an owners' organisation often depends on active individuals who are willing to assume leadership roles. However, elected committee members do not necessarily possess strong communication skills or the ability to effectively convey information. This can create information asymmetry between the committee and residents (Goodwin et al., 2020: 240). Moreover, MOB governance involves a range of specialised knowledge areas, including legal regulations, financial management, administrative practices, and building maintenance. Residents' expectations of committees often exceed the expertise that volunteer committee members can realistically provide. Committee members may lack professional training in these areas and typically have limited time to devote to governance activities. As a result, committee decisions may sometimes lack long-term strategic considerations (Hsieh, 2009; Webb and Webber, 2017). Residents may, therefore, perceive committees as lacking professionalism, which can further erode trust (McGuirk and Dowling, 2011; Reid et al., 2017; Treffers and Lippert, 2020; Vergara et al., 2019). At the same time, committee members themselves may experience significant pressure (Reid et al., 2017: 447). Interviews conducted in Chile suggest that committee members often feel that residents forget that their roles are voluntary and frequently impose heavy workloads on them (Vergara et al., 2019).

Second, when residents distrust committees, or when committees pursue interests that do not align with the

preferences of the majority and become dominated by a small group, individual residents may find it difficult to challenge existing arrangements. Efforts to elect new committee members or to oppose decisions require sufficient voting support from other owners (Gao, 2015; Yip and Forrest, 2002). This situation highlights the imbalance between committees and individual owners in terms of decision-making power and influence.

Several recommendations have been proposed to address these challenges. One suggestion is that committees may benefit from guidance provided by public authorities regarding management practices (Gao, 2015: 323). Another approach is to introduce mandatory training for committee members, as has been implemented in the Canadian province of Ontario (see Treffers and Lippert, 2020). However, the authors note that the effectiveness of this requirement has not yet been fully evaluated.

### **Theme 11: Power dynamics and knowledge differences among occupants**

This theme synthesises sources that examine the challenges faced by occupants and the internal power dynamics within MOBs from the perspective of those living in or using these developments. The term “occupants” here refers to owner-occupiers and tenants. The reviewed literature can be grouped into three main strands: (1) the limited understanding among residents, (2) differences in objectives between owner-occupiers and investor owners, and (3) the often overlooked position of tenants.

First, many studies indicate that owners often lack a clear understanding of what it means to purchase and hold a unit within an MOB. During the purchasing process, owners frequently face information shortages and may not know precisely what costs they will be required to pay after acquiring the property (Blandy et al., 2006; Easthope, 2015). Owners may not fully understand the rights and responsibilities associated with the property ownership structure of MOBs, nor do they always possess the knowledge required to participate effectively in building governance (Easthope and Randolph, 2009, 2016). In some cases, individuals may feel reluctant to engage with highly specialised domains such as legal matters (Vergara et al., 2019: 14). Limited transparency and the absence of effective market competition may also make it difficult for owners to make informed choices within increasingly commodified property service markets. At the same time, after paying a higher price to obtain ownership, they must still assume the responsibilities attached to membership in the MOB governance structure, while lacking the relative mobility enjoyed by tenants. Because of the high exit costs, owners may effectively become “bound” within this governance system (Chen and Webster, 2005: 218).

Second, several sources examine how the differing objectives of owner-occupiers and investor owners influence MOB governance (see Levy et al., 2022). Research conducted in Canada suggests that investor landlords may not reside in the same city and often participate infrequently in meetings. This absence can make it difficult to reach quorum requirements

in collective decision-making processes. Even when investors participate, they may prioritise maintaining low regular payments in order to avoid increasing the financial burden on their investment (Webb and Webber, 2017). These differences in priorities can have direct consequences for residents who actually live in the building.

Third, research indicates that tenants are often overlooked within this governance structure. Because participation in governance and voting rights are typically tied to property ownership, tenants who reside in these neighbourhoods lack formal institutional mechanisms through which they can influence decision-making. As a result, they may have limited incentives to engage with governance processes (Easthope and Randolph, 2009; Harris, 2019; Levin and Arthurson, 2020). Chen and Webster (2005), however, note that although tenants do not possess voting rights in Taiwan’s condominium governance system, they may attend general meetings and even serve as members of committees. The authors also observe that when they do, tenants’ priorities may differ from those of owners, often focusing more on short-term interests. It should be noted that the authors do not examine in detail how this arrangement operates in practice or what its broader implications may be.

The strategies and recommendations proposed in the literature generally focus on two areas: strengthening education and training, and improving legal frameworks. Lehari (2015: 33) argues that enhancing “technical civil competence” can contribute to more effective MOB governance. Proposed measures include providing information manuals and training for new occupants to familiarise them with routine management practices, conflict resolution, confidence-building, and the identification of building defects, as well as helping them learn how to select qualified professionals to avoid problems associated with third-party service provision (De Camargo Cavalheiro and Abiko, 2023; Marshall et al., 2018; Yau, 2018). Vergara et al. (2019) also suggest that owners should be educated on how to apply for government subsidies through administrative procedures. In addition, Levy et al. (2022) recommend improving legal frameworks in order to reduce imbalances in power and responsibility.

### **Theme 12: Property management**

Many of the management responsibilities in MOBs are carried out by managing agents. The three core functions of managing agents are administrative, secretarial, and financial (Lei and Van der Merwe, 2009). They play an important role in bridging owners and providing professional expertise during the decision-making process (Altmann, 2015a: 189). Management practices include, but are not limited to, ensuring the proper functioning of common infrastructure (electricity systems, water supply, elevators, fire safety facilities, security systems, internet infrastructure, lighting systems, communication systems, ventilation, heating, and the accuracy and maintenance of building signage), monitoring carbon monoxide levels and air quality, managing flood or water damage restoration, pest control, maintaining waste collection services, managing safety incident records, recording meetings, and remaining informed about relevant

regulations and guidelines while informing committees of regulatory changes (Lippert and Steckle, 2016: 143–144).

Despite their central role in the effective operation of MOB, international evidence suggests that deficiencies in the professional capacity of managing agents are common. These may include a lack of experience, unclear understanding of responsibilities (Webb and Webber, 2017: 53), loss of management documents (Levy and Sim, 2014: 413), excessive focus on self-interest, and ethical shortcomings, such as failing to remain neutral or becoming involved in conflicts between owners and other stakeholders (Altmann, 2015a; Levy and Sim, 2014). As individuals appointed by owners and expected to act as intermediaries among them, managing agents sometimes lack interpersonal and communication skills and may operate without sufficient transparency (ibid.). This not only undermines owners' trust in managing agents but may also have wider implications. For example, it may jeopardise retrofit initiatives or broader urban sustainability policies that rely on the coordination and communication capacity of managing agents (Altmann, 2015a). Additional challenges include high turnover within management teams, which may disrupt communication and delay the resolution of residents' concerns (Paris, 2006).

In response to these issues, some studies recommend strengthening the training of managing agents (Levy et al., 2022: 1240; Treffers and Lippert, 2020: 1041). Altmann (2015a) further argues for the establishment of stronger professional qualification systems. At the time of the study's publication in 2014, registration as a strata manager in the Australian state of Victoria did not require formal professional qualifications. The mandatory licensing requirements were limited to the purchase of professional indemnity insurance and the ability to remain solvent. While the state-level licensing system ensured that some compensation might be available if problems arose, it did not effectively regulate professional knowledge, technical competence, or professional conduct within the industry. Although professional associations within the sector offered membership schemes, these organisations did not possess the authority to control market entry (ibid.: 194). Altmann therefore suggests introducing mandatory qualification standards as a minimum requirement and empowering professional associations to impose sanctions, including the removal of poorly performing managing agents from professional registers.

In addition, other studies associated with this theme examine the perspectives of managing agents and committees regarding environmental retrofit measures (Altmann, 2014), the management practices of MOB that do not employ managing agents (Altmann, 2015b), and the potential for digital technologies to assist managing agents in performing their duties (Chen and Webster, 2005: 214).

### **Theme 13: Professionalisation and commodification**

Because owners often have limited time and professional expertise, the day-to-day functioning of MOB frequently relies on professionals from a range of sectors, including legal, financial, security, and engineering services (Lippert, 2019). This reliance has created a new field for value extraction,

as commodified service markets have gradually become embedded within MOB governance (Treffers and Lippert, 2024). At the same time, because professional knowledge is continually reshaped by both internal and external conditions, commodification should be understood as an evolving process (Lippert and Steckle, 2016: 143). Existing sources examine the challenges associated with professionalisation and commodification from several perspectives.

Easthope and Randolph (2009: 250) and Lippert and Steckle (2016: 143–144) examine property service companies and note that while corporations may generate substantial profits from owners, frontline staff responsible for the daily management of MOB often receive low wages and may lack adequate training and professional capacity.

Treffers and Lippert (2020) highlight how weak transparency and limited accountability can undermine market-based governance arrangements. They further suggest that the growing commodification of condominium management creates structural conditions conducive to conflicts of interest and exploitation. For example, hired auditors are typically tasked with verifying compliance with accounting rules rather than detecting fraud, which may limit their capacity to assure owners of the integrity of financial management (ibid.: 1036). Levy et al. (2022) therefore recommend establishing clear and credible ethical standards and disciplinary procedures, together with legislative measures to strengthen regulatory oversight.

McGuirk and Dowling (2011) focus on residents' perspectives within MOB environments shaped by asset management practices, commercial contracts, and economic logics. Their study of developments in Sydney, Australia, identifies the increasing presence of asset-management language and reasoning in residents' discussions of neighbourhood life. Some interviewees employed consumer-oriented calculations to evaluate the value of neighbourhood facilities, assessing amenities from a cost-benefit perspective (ibid.: 2619). At the same time, the interviews also reveal that many residents continue to value non-economic aspects of neighbourhood life (ibid.: 2620). This suggests that multiple value systems coexist within increasingly commodified MOB environments.

### **Theme 14: Juridification**

In this report, juridification refers to the growing influence of legal reasoning on the decision-making and management processes of MOB governance. Because the ownership and management of MOB involve extensive legal and contractual arrangements, and because owners often lack specialised legal knowledge, this situation tends to increase the dependence of both owners and managing agents on legal professionals.

Lippert and Steckle (2016) illustrate this process in their study of condominium governance in Toronto, Canada. Owners' organisations may spend substantial sums each year on legal services. However, the authors note that in the cases examined, legal professionals often served the interests of committees rather than those of the broader group of owners (ibid.: 139). As a result, lawyers may gain increasing influence

over decision-making processes, sometimes to the detriment of individual owners. For example, when lawyers attend owners' general meetings, they may use their legal authority to prevent questions or discussions, informing owners that particular topics are not appropriate for discussion in that setting (ibid.: 140).

Managing agents also work closely with legal professionals in everyday management practices. For instance, managing agents may ask lawyers to send formal letters to owners who violate noise regulations, with the legal costs borne by the owners' organisation. When owners approach managing agents with certain concerns, the agents may refer these matters directly to legal professionals for further handling (ibid.: 145). Such practices contribute to increasing dissatisfaction among owners. Lippert and Steckle (2016) therefore argue that greater governmental oversight may be required.

### Theme 15: Child welfare

Two sources address issues related to child welfare within

## Disputes

In addition to promoting collective action, another major challenge in MOB governance concerns the resolution of disputes (Mandič and Hrast, 2019). The second part therefore examines two themes:

- (1) Types, causes, and impacts of disputes
- (2) Dispute resolution procedures

### Theme 16: Types, causes, and impacts of disputes

Disputes and conflicts within MOBs take many forms, and similar types of conflicts may occur across different countries and contexts. For analytical purposes, disputes can be broadly grouped into four categories.

- Disputes related to the use of common facilities and everyday life: Common conflicts involve issues such as noise, pets, parking, the use or occupation of common areas, and interpersonal tensions among neighbours (De Camargo Cavalheiro and Abiko, 2023; Douglas et al., 2016; Easthope and Randolph, 2009, 2016; Levin and Arthurson, 2020; Pojani and Baar, 2016; Power, 2015; Vergara et al., 2019).
- Disputes arising from ownership structures and institutional arrangements: This category includes conflicts related to unclear divisions of ownership that complicate the allocation of responsibilities and rights (Shin et al., 2020, 2021), overly restrictive or unreasonable by-laws (Blandy and Lister, 2005; Harris and Patterson, 2024), and disputes related to elections and meetings (Lippert, 2019). For example, Chen (2024: 26) describes a case in which an outgoing committee refused to transfer control to a newly elected committee.
- Disputes over financial decisions: Disagreements regarding the prioritisation of expenditures are among the most common sources of conflict. In addition, the stable cash flows and substantial reserve funds held by many MOBs,

MOB environments. Johnston (2017), drawing on Sherry (2017), notes that by-laws grant owners significant authority to regulate aspects of everyday life within developments. The authors emphasise the need to consider whether such rules may inadvertently restrict residents' ability to protect the wellbeing of their children, potentially leading to harmful consequences.

Tang (2024) advances a similar argument, suggesting that the safety and welfare of children in neighbourhoods should not be subject solely to majority decision-making, particularly as the number of children living in MOBs continues to increase. Even when building regulations permit certain safety installations, measures such as safety nets, grilles, or fixed and retractable awnings designed to prevent child falls or injuries caused by falling objects (killer litter) may still require approval through majority voting or explicit authorisation in by-laws. Tang (2024), therefore, proposes that legislation should explicitly prevent MOB governance arrangements from prohibiting installations intended to protect children's safety.

particularly in large neighbourhood developments with numerous owners, can become targets for economic extraction by various stakeholders. This may lead to competition for positions on committees. Chen and Webster (2005: 216) describe a case in Taiwan in which an outgoing committee refused to transfer authority to a newly elected committee in order to retain control over a large budget, which subsequently escalated into political and gang-related conflicts.

- Disputes arising from differences in identity and interests: Diverging perspectives on decisions and expenditures may emerge from the differing identities and priorities of stakeholders, which can generate tensions within MOB governance structures (Lippert and Steckle, 2016). Such tensions may occur between owner-occupiers and investor owners, between owners and tenants, or between owners, committees, and property management companies (Chen and Webster, 2005: 213; Easthope and Randolph, 2009: 249; Reid, 2015: 443; Treffers and Lippert, 2020: 1038; Troy et al., 2017: 10; Webb and Webber, 2017: 54). For example, a case in Australia shows that retired owners may oppose long-term investments in the maintenance of common areas because of their age and fixed or declining incomes, whereas younger owners may favour greater investment in order to increase property values (Easthope, 2015: 320).

These disputes and conflicts may have negative consequences for residents' mental and physical wellbeing (Levin and Arthurson, 2020). When disputes escalate to formal legal proceedings, the high cost of legal representation and the lengthy process may impose additional financial burdens on owners (Treffers and Lippert, 2020: 1039).

## Theme 17: Dispute resolution procedures

Disputes are often addressed initially through interpersonal communication and internal procedures within the MOB. These may include discussions and negotiations led by the committee through face-to-face meetings, telephone communication, or email correspondence (Easthope et al., 2009). In certain situations, disputes may be referred to formal dispute resolution mechanisms involving professional mediation, adjudication, or tribunal and court hearings (Easthope and Randolph, 2009: 249; Easthope et al., 2014: 298). For example, the Australian state of Victoria introduced a three-tier dispute resolution system for owners corporations in 2007 (Douglas et al., 2016: 171–172; Shin et al., 2021: 2). The first stage involves internal resolution based on the model rules or a registered alternative scheme. The second stage provides conciliation or mediation services through a state government agency. If disputes remain unresolved after these procedures, the matter may proceed to the third stage, a hearing before the Victorian Civil and Administrative Tribunal. In most cases, legal action cannot be initiated without a special resolution of the committee, except in cases involving overdue fees or the enforcement of owners corporation rules.

However, the institutionalisation of dispute resolution mechanisms and the formalisation of rules through by-laws may also weaken traditional informal mechanisms, such as social networks based on personal relationships and community gossip (Blandy and Lister, 2005: 298), for resolving neighbourhood conflicts. The stacked and closely adjacent configuration of housing units in MOBs further contributes to this shift. Power (2015) highlights disputes related to pet noise, noting that the materials and spatial configuration may allow sound to travel through echoes or vibrations. In some cases, noise may only be heard in particular locations, making it difficult to identify its source. High levels of anonymity, privacy protection, and the presence of access-controlled entrances may also prevent residents from accessing other parts of the building or neighbourhood to investigate the source of

disturbances. As a result, residents may have little choice but to report problems to the committee or managing agents, with limited opportunities for informal resolution beyond actions such as leaving notes in shared spaces, for example, in elevators.

In addition, several sources examine topics related to dispute resolution beyond (in)formal procedures themselves. Chen (2024: 26) describes preventive measures designed to avoid failures in the transfer of committee authority. In China, after an election, the outgoing committee must transfer documents, seals, funds, and accounting records to the newly elected committee within a specified period. If a new committee has not yet been elected when the term expires, these materials must be temporarily transferred to the custody of local authorities. Refusal to transfer such materials may result in financial penalties.

Shin et al. (2020) propose the use of digital tools such as building information modelling (BIM) to clearly identify and mark ownership boundaries, thereby reducing disputes arising from unclear ownership arrangements. They also suggest developing user-friendly interfaces that allow committee members and owners to access this information easily.

Douglas et al. (2016) examine the effectiveness of model rules and find that owners in both very large and very small MOBs report higher levels of dissatisfaction compared with those in medium-sized developments. This finding suggests that dispute resolution mechanisms may need to be tailored to different building scales.

Douglas and Leshinsky (2017) also highlight ethical concerns in mediation processes that have often been overlooked and argue that mediators should receive training addressing these issues. This recommendation resonates with the proposal by Vergara et al. (2019: 17) to provide education and training related to dispute resolution.

## Governance models

The third part focuses not on the internal details of MOB governance but rather on broader governance models, alternative institutional arrangements, and their implications. Four themes are identified in this section:

- (1) Transformation of governance models
- (2) Extended governance structures
- (3) Mixed-use MOBs
- (4) Informal governance

### Theme 18: Transformation of governance models

Several sources examine how occupants adapt to or resist the transition toward dualistic ownership systems. These studies address three main situations: (1) national-level institutional transitions, such as those experienced in post-communist Eastern Europe; (2) the gradual introduction and institutional consolidation of property ownership frameworks; and

(3) the relocation of residents from non-dualistic housing environments, such as informal settlements, into formalised MOB developments. Although these cases differ substantially from the contexts of England and Wales, the ways in which residents respond to changes in housing governance systems offer valuable insights for the transition toward a commonhold system.

First, in the case of Albania, Pojani and Baar (2016) show that the legacy of political rule prior to the country's political transition fostered strong levels of distrust among residents. During the post-communist period, even though formal governance institutions for MOBs were introduced, historical institutional legacies weakened residents' incentives to participate in collective action. Furthermore, because legislation did not require the establishment of owners' associations, residents developed informal arrangements for building management and maintenance. In the case examined, one resident voluntarily assumed responsibility

for management tasks and collected payments from other residents without any written agreement. In some cases, such individuals managed several buildings simultaneously. Households that could not afford the fees instead maintained and cleaned the common areas located near their own units.

Second, Chen (2024) examines the effectiveness of institutional development and implementation in China. Chen argues that cultural factors play an important role in shaping residents' responses to institutional change. Residents tend to show greater tolerance toward frequent revisions of laws and regulations, and the relative flexibility and ambiguity of management arrangements may facilitate adaptation to evolving institutional environments.

Third, cases from South America show that residents who relocate from earlier forms of community living into institutionalised MOB environments often reproduce previous social practices within the new setting. In Chile, for example, residents were accustomed to modifying their homes and expanding their living spaces. After moving into MOBs, some residents living on the ground floor extended their private living areas into adjacent common spaces, effectively excluding others from using those areas. Over time, this practice created an informal norm whereby individuals wishing to use these spaces would negotiate directly with the households occupying them (Vergara et al., 2019). In Colombia, residents similarly reproduced earlier patterns of expectations and social practices, such as placing clotheslines, potted plants, and armchairs in common areas or using stairways and corridors as informal gathering spaces with neighbours and friends (Mejia-Escalante, 2012, cited in De Camargo Cavalheiro and Abiko, 2023). Residents undergoing institutional transitions may also lack knowledge regarding building maintenance and may not fully understand the concept of collective property ownership (Vergara et al., 2019: 10). In Brazil, De Camargo Cavalheiro and Abiko (2023: 438) find that social workers can play an important role in supporting residents' adaptation to these new governance arrangements.

Taken together, these cases suggest that the mere establishment of institutional frameworks and legal regulations does not guarantee effective implementation. Governance arrangements must take into account local social practices and cultural preferences, which shape the patterns through which collective action is organised (Chen, 2024). Lehavi (2015) and Chen (2024) further emphasise that successful transitions toward new governance models require both clear legal frameworks and active participation by owners' organisations.

### **Theme 19: Extended governance structures**

Two studies, based on cases from China and Denmark, describe governance arrangements that this report refers to as extended governance structures. These structures operate alongside the existing dualistic ownership system in order to address specific governance challenges. In the Chinese case, the structure strengthens channels for communication and representation (Chen, 2024), while in the Danish case it helps ensure a fairer distribution of rights and responsibilities (Madsen et al., 2022). Although the details differ, both

arrangements involve further differentiation of governance structures in order to better respond to residents' needs and concerns.

- **China:** Because many neighbourhood developments are large and consist of multiple MOBs, a hierarchical governance structure has emerged. In addition to the organisation and committee representing all owners, each building may also establish a sub-organisation and a designated leader responsible for building-specific matters (Chen, 2024). This leader may be appointed by the committee or recommended by residents (Lehavi, 2015: 23). Such individuals are typically proactive and capable of coordinating residents' interests, thereby helping to consolidate owners' views and negotiate with developers or property management companies (Chen, 2024).
- **Denmark:** Disputes and dissatisfaction often arise from disagreements regarding the allocation of rights and responsibilities associated with common property. In some cases, certain owners may rarely need or be able to access particular facilities due to their physical location or design, yet they remain responsible for contributing to their maintenance. To address this issue, some Danish MOBs have adopted a two-tier governance structure that distinguishes between general common property and limited common property. In legal terms, both forms remain collectively owned by all owners. However, general common property is managed by a master owners' association, while limited common property is managed by a subsidiary association. The master association includes all owners and is responsible for shared structural elements such as external walls and the building structure. The subsidiary association consists of owners of specific units who benefit from particular facilities and is responsible for managing those facilities, such as amenities located within a specific building or designated parking areas. This two-tier governance structure allows certain units to be exempted from some common expenses or limits access to specific common areas. It is particularly suitable for mixed-use developments or large-scale MOBs (Madsen et al., 2022).

### **Theme 20: Mixed-use MOBs**

Mixed-use MOBs receive attention in a limited number of sources, each focusing on different forms of mixed-use arrangements. Muczyński (2023) applies quantitative methods to analyse whether MOBs in Poland that are jointly owned with local municipalities, where some residential units remain public housing and have not been fully privatised, affect decision-making related to renovation.

Fisher and McPhail (2014) examine condominiums located in tourist destinations and explore how tourism activities influence the everyday living experiences of residents. Guilding et al. (2005, cited in Fisher and McPhail, 2014), suggest that residential and tourism-oriented developments should be separated in order to avoid conflicts associated with mixed-use arrangements.

Harris (2019) investigates a mixed residential and commercial MOB in Vancouver, Canada, examining a legal dispute

between residents and a commercial unit, a pharmacy. Residents raised complaints related to noise, loitering, and littering caused by the pharmacy's customers. The committee imposed fines on the pharmacy based on the building's by-laws. Mixed-use MOBs therefore operate at the intersection of neighbourhood governance and broader urban governance, as commercial units serve a wider urban population beyond the immediate building residents. However, within the existing ownership structure, democratic resident governance tends to prioritise the interests of property owners, while the interests of the broader public receive less consideration. In neighbourhoods experiencing rising property values, residents may also selectively accept or exclude particular commercial facilities through governance mechanisms in pursuit of asset appreciation, potentially reinforcing processes of gentrification.

### **Theme 21: Informal governance**

Formal institutions and legal frameworks are not always sufficient to address the practical realities of MOB governance. Several sources examine when and how informal institutions are mobilised to address practical problems through bottom-up initiatives.

In Brazil, for example, when low-income households struggle to make regular payments, managing agents and neighbourhood leaders may offer instalment payment arrangements in order to prevent these households from falling into cycles of debt (De Camargo Cavalheiro and Abiko, 2023: 438). A similar case has been reported in Russia, where committees have allowed financially vulnerable households to be exempted from regular fees (Lehavi, 2015: 33). These examples illustrate how management actors may exercise

discretionary authority granted by owners in order to apply informal governance practices.

In Chile, another example shows how residents themselves organise bottom-up solutions. Because of financial constraint, residents sometimes undertake building maintenance and repairs collectively, clean common areas, or water communal gardens. These activities often occur in the absence of formal maintenance plans. Residents may also organise fundraising activities, such as communal meals or the preparation and sale of food, in order to raise funds for funeral expenses or emergency repairs within the community (Vergara et al., 2019).

Guo (1999, cited in Chen and Webster, 2005: 215) examines how informal approaches may be used to facilitate collective action. Apathy among owners often makes collective discussions and decision-making difficult in MOBs, particularly in neighbourhoods with large numbers of owners. In one case from Taiwan, an innovative approach was developed to address this challenge. Rather than holding a single large general meeting, management organised multiple smaller meetings involving residents from specific buildings or sections of the neighbourhood. This arrangement made communication and meeting organisation more manageable and allowed owners to gain a deeper understanding of the issues under discussion before voting, while also providing opportunities to offer feedback.

These examples demonstrate both the resilience of residents and the creativity with which they address governance challenges. At the same time, such practices also reveal the practical difficulties that residents encounter within existing governance systems.

## Social interaction, lifestyle, and community

The fourth part brings together discussions that examine the social dynamics embedded within the institutional and spatial arrangements of MOBs. These dynamics include lifestyle patterns, residents' perceptions and experiences, social interactions and relationships, and cultural practices. Five themes can be identified:

- (1) Institutionalisation of neighbourhood relations
- (2) Sense of belonging and community
- (3) Low-income households
- (4) Sense of security
- (5) Cultural diversity

### **Theme 22: Institutionalisation of neighbourhood relations**

Traditional neighbourhood relations can function as a form of social regulation by shaping community behaviour through shared moral codes (Power, 2015: 247–248). Governance arrangements in MOBs embody a form of private collective order that is designed to protect internal interests while also safeguarding property values. These institutional arrangements, and their various adaptations, aim to reduce

power distance among participants while establishing systems of majority-based governance and accountability. Through processes of institutionalisation and juridification, the reliance on grassroots social capital is reduced, as moral codes become formalised and contractualised through by-laws (Lehavi, 2015: 15; Power, 2015: 247–248).

Empirical cases illustrate how these dynamics unfold in practice. Interviews with residents in Brazil show that some individuals perceive neighbours as potential sources of threat or inconvenience (De Camargo Cavalheiro and Abiko, 2023: 438).

In a case study from New York State in the US, security infrastructure, controlled access systems, and by-laws create a closed living environment that promotes a perceived form of social homogeneity. Low et al. (2012: 289–291) describe this condition as "moral minimalism," in which homogeneity is used as a mechanism to reduce potential conflicts in advance. However, because committees act as agents and by-laws provide formal rules for governance, residents may become accustomed to delegating responsibilities to committees. Participation by residents may therefore be perceived as undesirable and time-consuming, which ultimately

undermines the democratic governance mechanisms that these institutional arrangements were intended to promote (ibid.).

### **Theme 23: Sense of belonging and community**

Existing empirical evidence suggests that perceptions of belonging and community within resident-governed MOBs are highly heterogeneous. Although residents often recognise the potential importance of a sense of community, interviews conducted in Brisbane, Australia, indicate that many residents show limited desire to become deeply involved in community activities (Reid, 2015: 447). Interactions among residents often occur in corridors, shared spaces, or owners' meetings rather than through proactive social engagement such as visiting neighbours' homes (Power, 2015: 257). Communication among occupants may remain superficial, and excessive interaction may even be perceived as an intrusion into personal privacy or as unwelcome interference in others' affairs. For some residents, the ability to avoid frequent encounters with neighbours is itself considered an advantage of living in MOBs (Reid, 2015: 442). Reid (2015: 443) also notes that certain forms of social distance may reflect individual choices shaped by social, economic, or psychological differences.

In contrast, some residents actively seek opportunities to build social connections (Reid, 2015: 443). Research conducted in New South Wales, Australia, demonstrates residents' willingness to engage in community life and emphasises the importance of collective responsibility (Troy et al., 2017: 11). Another qualitative study focusing on small-scale MOBs in Australia documents strong social relationships among residents (Levin and Arthurson, 2020). These findings indicate that perceptions and experiences of community may vary significantly across and within neighbourhoods.

Other sources examine conditions that may strengthen or weaken residents' sense of belonging and community:

- Easthope et al. (2014: 197) argue that the decision to move into an MOB may often be driven by the characteristics of a particular dwelling unit or surrounding amenities rather than by expectations of neighbourhood interaction. Residents may therefore not initially anticipate strong engagement with their neighbours (see also Blandy and Lister, 2005: 294).
- Reid (2015: 438, 444) highlights the importance of physical design in facilitating social interaction. High-quality shared spaces can encourage the development of social relationships (Baum and Palmer, 2002; Francis et al., 2012; Zhang and Lawson, 2009), rather than functioning merely as circulation areas, such as neatly arranged lobbies with seating and decorative elements that residents simply pass through. Reid (2015: 447) further suggests that developers could strengthen the design of communal leisure facilities, while managing agents or committees could organise group activities that encourage interaction among residents.
- Kim and Jang (2017) find in a cross-sectional study conducted in South Korea that residents who have lived longer in a neighbourhood are more likely to participate

in community activities. Similar findings are reported in Australia (Reid, 2015), where long-term residents, including owner-occupiers and long-term tenants, tend to develop stronger social interactions than short-term tenants. In contrast, highly mobile short-term tenants are often perceived negatively by other occupants and may face exclusion. Because they lack formal decision-making power, they may also experience weaker feelings of belonging and have greater difficulty developing a strong sense of community (Kim and Jang, 2017; Reid, 2015). Reid (2015: 446–447) therefore suggests that increasing opportunities for tenant participation may contribute to improved neighbourhood relations and more sustainable residential environments.

Other factors may also influence social interaction and participation. Smaller community size (Kim and Jang, 2017) and greater social homogeneity among residents (Reid, 2015: 443) may encourage stronger engagement and interaction. However, research from Hong Kong suggests that owners' organisations tend to prioritise efficient governance rather than fostering neighbourly relationships (Yip and Forrest, 2002: 717).

At the same time, strong community ties may also generate tensions. Research shows that conflicts among neighbours may have deeper emotional impacts in environments where residents previously enjoyed close relationships (Levin and Arthurson, 2020). One interviewee described reducing visits to a communal garden after a dispute in order to avoid encountering neighbours, which subsequently affected the resident's health.

Although many sources indicate that in urban areas experiencing rising property values, property purchases are often driven more by asset value and neighbourhood reputation than by expectations of neighbourly relationships, these attitudes may evolve over time (Blandy and Lister, 2005). Evidence from South Korea and Australia suggests that longer-term residents tend to exhibit higher levels of participation, indicating that community engagement may increase as residents become more established in their neighbourhoods.

### **Theme 24: Low-income households**

Some sources specifically examine the living conditions of low-income households within MOBs. Because living spaces for low-income families may be more crowded (Nasreen and Ruming, 2021), surrounding environments and shared facilities often play a particularly important role in their everyday lives. These external spaces may be perceived as extensions of the home environment (Andrews and Warne, 2020). Such spaces include parks, neighbourhood areas, schools, childcare facilities, and nearby workplaces, transport services, and retail areas (ibid.). Although MOBs typically include internal shared facilities, the number and scale of these facilities may not always be sufficient. Expanding such amenities may also increase development and maintenance costs, which, when distributed among residents, may impose additional financial burdens on low-income households (Easthope et al., 2022: 215).

## Theme 25: Sense of security

Several sources examine the factors that shape residents' perceptions of safety within MOB environments, highlighting the diversity of these experiences. Blandy and Lister (2005: 292), for example, report that security features within MOBs were an important reason why a single female interviewee felt reassured about living in such developments.

Interviews conducted in two locations in New York State indicate that residents living in MOBs characterised by greater social homogeneity, stronger communication among residents, effective committee leadership, and a shared sense of collective identity may feel safer than those living in developments that rely primarily on physical security measures (Low et al., 2012). Some interviewees emphasised that their sense of safety stemmed from living among "people like us." At the same time, however, in MOBs where residents can screen potential purchasers, such as cooperative housing developments, stronger social and economic homogeneity may contribute to forms of spatial exclusion, potentially marginalising minority groups and even reinforcing racial discrimination (Low et al., 2012: 289).

## Additional prominent issues

The final part brings together three themes that have received significant attention in the literature:

- (1) The legal significance of ownership
- (2) The financialisation and market value of MOBs
- (3) Climate change adaptation and retrofit

### Theme 27: The legal significance of ownership

The governance of MOBs, particularly the complexity surrounding ownership arrangements, has attracted attention from legal scholars. Carr and Halliday (2025) argue that MOBs operate at the intersection of public law and private law. In situations where private collective action fails, such as when reserve funds are insufficient or individual owners fail to fulfil their required responsibilities, the state may intervene in building maintenance in the public interest.

Walsh (2017) compares land-use regulatory systems in England and the US. The author notes that although both jurisdictions recognise private mechanisms for regulating land use, structural characteristics in England, particularly the dominance of freehold systems and the relative rarity of commonhold compared with common interest communities in the US, limit the regulatory potential of private governance mechanisms. As a result, public planning continues to play an indispensable role in England.

### Theme 28: The financialisation and market value of MOBs

As discussed in Theme 22, one of the underlying purposes of governance arrangements and by-laws in MOBs is to protect the market value of properties (McKenzie, 1994; Lehavi, 2015). Existing research examines how different stakeholders

## Theme 26: Cultural diversity

Liu et al. (2018: 406–407) conduct a critical literature review examining research on cultural diversity in MOB environments. Here we raise two relevant key arguments. First, community activities and social connections can generate multiple benefits, including improving environmental quality, helping residents develop neighbourhood plans, reducing social isolation, and strengthening collective responsibility (Wandersman and Florin, 2000). Second, cultural differences may create discomfort or conflict during collective activities, for example, in relation to dietary restrictions or other cultural practices.

The authors recommend adopting measures to address both the growing prevalence of high-density housing and the increasing cultural diversity of residents. These measures include providing translated versions of management documents and meeting materials as standard practice, as well as offering educational programmes to assist occupants who may be unfamiliar with local regulations and governance systems. Such initiatives could begin during the sales and transition stages of MOB developments.

develop strategies and utilise, or sometimes ignore, these governance mechanisms in contexts where the state relies on MOB development to sustain economic growth and expand the tax base, while property markets continue to expand (Treffers and Lippert, 2024: 1443). Two frequently discussed phenomena illustrate these dynamics.

- Governance measures as mechanisms of exclusion: Dredge and Coiacetto (2011, cited in Fisher and McPhail, 2014) and Kim and Jang (2017) both observe that governance practices implemented by owners' organisations may attract socially homogeneous groups. These practices may therefore function as mechanisms of exclusion and tools for protecting property values, reinforcing socio-economic segregation among residents. McKenzie's (2003) research on gated communities similarly highlights this dynamic. Kim and Jang (2017: 1165) suggest that governments should consider these potential consequences when designing policies and providing training for owners and committees, in order to avoid discriminatory effects on access to basic services and facilities.
- Internalisation of financial logics: The internalisation of financial logics among stakeholders can emerge from the early stages of the MOB life cycle. Research conducted in Canada finds that developers sometimes promote and sell condominium units as investment opportunities by emphasising that purchasers do not need to occupy the units themselves (Lippert and Steckle, 2016). The authors also observe that many owners voluntarily serve on committees in order to participate more actively in decision-making processes that may protect or enhance property values. Such owners may reinforce the dependence of condominium governance on real estate agents and related professionals. This orientation may influence collective decision-making priorities, for example,

by directing collective funds toward improving building appearance rather than maintaining internal infrastructure, such as boilers or water systems (ibid.: 140–141).

Troy et al. (2017: 10) note that investor owners often prioritise exchange value, which may conflict with the priorities of occupants who emphasise use value, including owner-occupiers and long-term tenants. Similar tensions may also occur among owner-occupiers themselves. Easthope (2015: 320), for example, finds that younger owners may be more willing than retired owners to increase investments in the maintenance of common areas in order to raise property values. For retired owners, however, such investments may not align with their long-term interests, particularly when their incomes are fixed or declining. Evidence from Hong Kong similarly demonstrates differences in decision-making among owners with varying levels of wealth (Yip and Forrest, 2002). Middle-class owners may be more willing to invest continuously in maintenance due to expectations of rising property values, while lower-income owners, especially those living in older and lower-value buildings, may be less willing or able to make such investments.

These findings illustrate how financial logics can become embedded in decision-making processes within MOB governance. It should be emphasised that this report does not argue that the institutional framework of MOBs itself produces such financial orientations among residents. Rather, the focus is on how responses shaped by financial logics may generate conflicts and influence governance dynamics within MOB environments.

Additional relevant sources are summarised below:

- Goodwin et al. (2020) find in their study of the US that buyers in the highest-priced housing markets may avoid common interest developments governed by homeowner associations. Possible explanations include the complexity of restrictions and the potential for disputes. Buyers in the lowest-priced market segments may already face heavy financial burdens from mortgages and taxes and may therefore seek to avoid additional fees associated with such developments. This study highlights how by-laws, amenities, and fees can influence purchasing decisions among different market segments.
- Karpestam and Palm (2022) examine how the size of owners' associations, measured by the number of units within a development, may influence their attractiveness in the housing market. Potential buyers may perceive smaller neighbourhoods as offering greater opportunities to influence decision-making, while larger developments may benefit from economies of scale in service contracts and financing conditions. However, the authors emphasise that this topic requires further research.
- Altmann (2014: 440) discusses the relationship between retrofit investments and the market value of individual units. Although investments in physical improvements are generally expected to generate price premiums, the magnitude of these premiums depends on the extent to which local markets value energy-efficient buildings.

## Theme 29: Climate change adaptation and retrofit

A number of sources address climate change adaptation and retrofit in MOBs. The specific retrofit measures adopted often depend on the policy frameworks of different jurisdictions. In Australia, for example, retrofit initiatives generally follow two main approaches (Altmann, 2014): (1) reducing water and energy consumption (e.g., improving building insulation to reduce heat loss, installing water-flow restrictors), and (2) strengthening household-level production of water or energy (e.g., solar panels, solar hot water systems, rainwater harvesting systems).

One of the key policy challenges arises from the difficulties of collective action (Bright and Weatherall, 2017; Charters et al., 2023). Some jurisdictions have attempted to address this issue through institutional reforms. In Spain and France, for example, regulatory changes have reduced the voting threshold required for installing renewable energy systems. Rather than requiring the approval of a majority of all owners, such decisions now require only a simple majority vote (Bright and Weatherall, 2017: 227). In addition to institutional factors, communication and individual leadership often play critical roles in the governance of MOBs. Charters et al. (2023) analyse which characteristics of individual owners are most influential in advancing collective decisions to install solar energy systems.

Beyond these broader challenges, Altmann (2014) identifies three empirical findings from the Australian context that have broader relevance. First, certain areas within MOB developments may have limited potential for water conservation, although owners may not always be aware of this. Examples include water consumption associated with garden maintenance or mandatory testing of fire hydrants. Second, at the time of the study's publication in 2014, retrofit measures aimed at environmental sustainability were not legally recognised as part of maintenance plans or sinking funds. As a result, owners seeking to undertake such upgrades often had to rely on low-interest loans or public subsidies to finance the required investments. However, uncertainties remained regarding the relationship between the costs of these investments and the savings generated through reduced energy consumption, as well as the potential implications of borrowing for MOB governance. Third, government subsidy programmes were limited in scale and not widely known among MOB communities, which created unequal access to available support. These three issues, overlooked water consumption, expenditure regulations, and unequal access to subsidy programmes, may occur in many countries, including the UK.

The literature addressing climate change adaptation and retrofit proposes a range of policy recommendations. These can be broadly grouped into four categories.

- Funding: Guilding et al. (2015) suggest that climate adaptation measures should be included within the permissible uses of sinking funds. Altmann (2014: 454) also cautions that when promoting financing schemes for retrofit measures, policymakers should consider the potential implications for future owners.

- **Infrastructure:** In many MOBs, individual owners are unable to measure their own water consumption, which makes it difficult for them to manage their usage and may contribute to the emergence of the tragedy of the commons. In addition to subsidies for shared infrastructure, policies should support the installation of individual unit metres. This would encourage owners to take responsibility for their own consumption and increase the likelihood of achieving sustainability goals (Altmann, 2014: 454).
- **Incentives:** Guilding et al. (2015: 316) propose the introduction of building rating systems that evaluate the capacity of buildings to withstand extreme climate conditions. Lower ratings may negatively affect market values, thereby creating incentives for improvement. They also suggest incorporating climate exposure risks and resilience capacity into lending criteria for mortgage approvals.
- **Communication and education:** Policies aimed at encouraging retrofits and climate adaptation measures require high-quality communication with owners in order to ensure that information is clearly conveyed and understood (Altmann, 2014; Charters et al., 2023; Guilding et al., 2015). Altmann (2014: 454) further recommends broader promotion of public subsidy programmes in order to ensure fair access. Guilding et al. (2015: 316) also propose that developers should play a role in this process. Because potential buyers often receive important information about property investments and building operations during interactions with developers, developers could be required to provide information and guidance on climate-related risks affecting MOBs. Such measures could help future owners better understand potential climate-related challenges relevant to their properties.

## 3.4 Stage 4: Termination

Before a building can be demolished and redeveloped, it must pass through the final stage of its life cycle: termination (Easthope and Randolph, 2009: 254). MOBs may undergo redevelopment under three main circumstances:

- (1) when buildings have deteriorated to the point that repair and maintenance costs exceed the cost of demolition and reconstruction, sometimes triggered by natural disasters (Webb and Webber, 2017: 52), marking the physical and/or economic end of the building's life cycle;
- (2) when the land is considered underutilised, or when planning regulations permit higher density or greater floor area ratios, potentially generating substantial economic returns;
- (3) when the development is located within areas targeted by specific urban planning strategies (Easthope et al., 2013: 1422, 1424; Troy et al., 2017: 4, 8).

The initiative for termination may come either from the owners themselves or from external developers seeking to realise potential economic gains (Easthope et al., 2014: 299).

Sherry (2006, cited in Easthope and Randolph, 2009) identifies three main mechanisms through which termination may occur: unanimous consent among owners; fixed-term schemes established at the outset (found in some cases in the US); and arrangements in which existing owners cooperate with developers to redevelop the site. The first mechanism, among these, may face the tragedy of the anticommons (Heller, 1998). A small number of owners refusing termination could force the remaining owners to bear continuously increasing maintenance costs. More broadly, such situations could also hinder urban planning objectives (Easthope et al., 2014: 299; Webb and Webber, 2017: 51).

4 One approach involving collaboration with developers is to formulate a renewal plan “with details on the preferred development outcome, proposed building works, development application requirements, architectural plans, the obligations and liabilities of all parties, and cost estimates and work programmes.” Following several months of consultation, owners then vote on whether to terminate the scheme (Easthope et al., 2013: 1428). Owners who do not wish to participate in the redevelopment must have their shares purchased by other owners. Although the procedure is complex, it has tax advantages in Australia compared with collective sale. However, this may not necessarily be the case in other jurisdictions (ibid.).

Redevelopment following termination typically occurs through two main routes: (1) collective sale to a third party (e.g., developers), or (2) collective renewal, where the scheme is terminated but the owners retain their interests in the land and collaborate with developers to undertake redevelopment<sup>4</sup> (Crommelin et al., 2020: 262; Easthope et al., 2013: 1428).

Existing discussions surrounding termination mechanisms and their implications can be broadly organised into four themes:

- (1) Voting thresholds for termination and their impacts on owners
- (2) Ownership and collective decision-making
- (3) Impacts on non-owners
- (4) Implications for urban planning

### Theme 30: Voting thresholds for termination and their impacts on owners

Achieving unanimous consent is extremely difficult in practice, particularly in contexts where urban land ownership is highly fragmented (Easthope et al., 2013: 1422). Prior to legislative reforms in the Australian state of New South Wales, another possible pathway to termination involved intervention by the Supreme Court (ibid.: 1424). In New South Wales, unanimous consent historically required agreement not only from all lot owners but also from all the lessees and mortgagees (Easthope and Randolph, 2009: 254). In 2015, legislation in New South Wales reduced the consent threshold for termination to 75% (Crommelin et al., 2020: 262). Many other countries and private law jurisdictions also adopt majority consent rather than unanimous consent, including Singapore, Hong Kong, Japan, the Canadian province of British Columbia, and New Zealand (ibid.: 261). Thresholds generally fall between 75% and

90% (Easthope and Randolph, 2009: 254). For example, the threshold in Ontario, Canada is set at 80% (Webb and Webber, 2017: 51). In Singapore, legislation enacted in 1999 introduced a differentiated threshold: developments less than ten years old require approval from 90% of owners, while those more than ten years old require approval from 80% (Easthope et al., 2013: 1427; Sim et al., 2002: 462). Even after a decision is reached, minority owners may attempt to protect their interests through legal challenges (Sim et al., 2002).

The reasons why some owners oppose termination, as well as the consequences for owners following termination, have received significant attention in the literature. Some opponents argue that lowering the voting threshold effectively allows the majority to authorise the expropriation of individual property rights (Easthope et al., 2014: 299). Others oppose termination because they consider the sale price too low. In cases of collective sale, compensation payments are often insufficient for purchasing a newly built property in the same location. Housing that can be purchased nearby with the compensation is usually older and may itself face future termination. This situation can be particularly difficult for retirees who wish to remain in the same neighbourhood but have fixed or declining incomes (Crommelin et al., 2020: 265). Forced relocation under such circumstances may sever social networks, affecting residents' identities and lifestyles (ibid.: 266). Additional financial considerations include substantial tax liabilities associated with property transactions (Sim et al., 2002: 461–462).

Opposition to termination is not always driven by financial considerations (Webb and Webber, 2017: 52). Even when significant financial gains are possible, some owners may resist redevelopment due to emotional attachments to their homes or family-related considerations (Sim et al., 2002: 461–462). Because compensation within current legal frameworks is typically monetary and based on market value, Troy et al. (2017: 10) argue that broader social dimensions, including emotional, cultural, and political considerations, should also be taken into account. Another strand of research focuses on the distribution of benefits following termination (Ti, 2020).

### **Theme 31: Ownership and collective decision-making**

Termination allows a collective decision by the majority to intervene in the rights of minority owners, which has generated extensive debate regarding the meaning of ownership in MOB. Such decisions affect not only common property but also the individual property rights attached to privately owned units.

One major concern relates to the potential erosion of individual property rights (Easthope et al., 2013: 1429). The tension inherent in termination procedures arises from the relationship between the rights attached to individually owned lots and the rights and responsibilities derived from collectively owned shares. At the same time, these debates engage broader societal understandings of home, citizenship, and rights to housing (Troy et al., 2017: 2). Troy et al. (2017: 8) raise a key question in this regard: the issue is not simply whether termination voting procedures restrict individual property rights over specific units, but rather whether

decisions concerning the transfer or economic exploitation of collectively owned property should be determined unilaterally by individual owners or collectively through majority rule (see also Sood, 2000: 15). In addition, under a dualistic ownership system, we argue that the responsibilities borne by owners are as important as the rights they hold. These responsibilities extend beyond the immediate neighbourhood to broader public interests, since the physical condition of buildings affects not only individual units but also all occupants and surrounding communities (see Carr and Halliday, 2025; Easthope et al., 2014: 299; Harris, 2019). Nevertheless, the specific design of termination mechanisms must ultimately reflect local understandings of private property rights within different legal and social contexts (Easthope and Randolph, 2009: 255).

### **Theme 32: Impacts on non-owners**

Tenants often become overlooked actors within termination procedures because they typically have no formal voice in decision-making. This is notable given that tenants often represent a significant proportion of occupants in many MOB developments. Many tenants also belong to socially or economically vulnerable groups, or may be experiencing temporary or long-term life difficulties (Troy et al., 2015). Following redevelopment, higher rents in newly constructed housing may force tenants to leave the area, disrupting their social connections within the neighbourhood (Easthope et al., 2013: 1429). For example, Crommelin et al. (2020: 265) note that elderly tenants often choose small units in older MOB. Because of their relatively lower rents, rent increases following redevelopment may therefore further marginalise these residents. Such displacement pressures could contribute to housing insecurity and potentially require governments to expand the provision of affordable housing (Easthope et al., 2013b: 1429). In response to these concerns, Crommelin et al. (2020: 267) suggest that termination procedures should incorporate safeguards for vulnerable groups within their institutional design. However, it should be noted that the situation may differ for social housing tenants in England and Wales, where formal consultation mechanisms are typically required.

### **Theme 33: Implications for urban planning**

Easthope et al. (2013) highlight both the opportunities and challenges associated with redevelopment following termination from an urban planning perspective. Governments may require the incorporation of inclusionary zoning within new developments, for example, through the provision of open space or affordable housing. At the same time, redevelopment projects often allow for a greater number of units and increased residential density within specific areas. This may generate localised pressures on infrastructure and public services as populations grow. In addition, investors may purchase multiple units in an attempt to pressure owners who oppose redevelopment, potentially intensifying conflicts of interest. These challenges suggest that governments need to carefully manage redevelopment through renewal strategies, local rezonings, and broader planning frameworks in order to balance economic feasibility, urban planning objectives, and community interests.

# 4. Conclusion

Critiques of and calls for reform of the leasehold system have persisted for several decades. Following the Grenfell Tower fire, many of the problems relevant to this widely used property tenure system in England and Wales were brought further into public scrutiny. As the promotion of the commonhold system has been placed on the policy agenda, and reforms are gradually being delivered, the experiences of comparable systems in other countries can provide valuable lessons for the development of commonhold, since such systems have been in operation internationally for many years.

Guided by this core objective, this study conducts a rapid, systematic literature review of international discussions

published since 2000. Drawing on the Web of Science database, the researchers reviewed and coded 74 sources in full text, covering evidence from 25 countries (or regions). In total, 33 themes were identified. These themes are organised according to the four stages in the lifecycle of multi-title developments (development, transition, operation, and termination). This structure enables readers to develop a clear understanding of the full temporal trajectory of MOBs and the challenges encountered at each stage. In the conclusion, we first summarise the key underlying factors that have contributed to governance challenges identified in the existing literature. We then propose two main directions for future research.

## 4.1 Key Challenges Informed by Existing Evidence

The international evidence reviewed in this report highlights the characteristics of MOBs under dualistic ownership systems. Hybrid ownership structures, vertically integrated building forms and infrastructures, and the collective action challenges, combined with substantial budgets and expenditures, render MOB governance highly complex and dependent on specialised knowledge and expertise. While professionalisation can assist both owners and governments in navigating this complexity, existing evidence also demonstrates how certain actors may exploit institutional ambiguities for value extraction, potentially generating long-term risks for housing safety and broader social outcomes. Two underlying drivers can be identified across many of these issues: (1) **limited transparency of information**, and (2) **power asymmetries**.

First, the lack of transparency arises from two conditions: (a) information barriers produced by complexity and technical specialisation, and (b) inefficient or restricted information flows among stakeholders, whether intentional or unintentional. The former refers to situations in which stakeholders lack the knowledge of solutions or expertise required to access or interpret critical information. For example, owners may be unaware of the long-term implications of specific construction materials or design choices, unclear about the responsibilities associated with owning an MOB unit, or unable to formulate appropriate maintenance and sinking fund plans. Similar issues may also arise among other stakeholders; for instance, managing agents may lack up-to-date professional knowledge due to insufficient training or regulatory oversight. The latter refers to situations where information is inaccessible due to limited channels or deliberate withholding. For example, residents may lack the means to evaluate and compare developers or service providers, while developers may obscure the likelihood of rising service charges, pre-existing contractual obligations, or embedded mechanisms of control.

Second, power asymmetries also arise from two conditions: (a) structurally embedded positional advantages within

institutional arrangements, and (b) disparities in expertise among stakeholders. The former is most evident where developers exploit their positional advantage within the life cycle, particularly during the transition stage, to influence committee decisions, secure service contracts, and establish by-laws that enable continued profit extraction. Similarly, the inherent difficulty of coordinating collective action may be leveraged by interest groups, whose decisions are less easily constrained by fragmented owner participation. The latter refers to situations in which stakeholders use their superior expertise to influence collective decision-making processes within MOB governance, sometimes as a means of extracting value. For instance, legal professionals engaged by committees may prioritise the interests of the committee rather than those of the broader ownership body.

These two underlying factors are mutually reinforcing. At the same time, socio-economic conditions and the relatively low liquidity of properties further increase owners' exit costs across multiple dimensions (Chen and Webster, 2005), **limiting the effectiveness of market mechanisms**. Nevertheless, this does not imply that MOBs under dualistic ownership systems are inherently problematic.

The "inbuilt democracy" embedded within shared ownership systems safeguards owners' rights and control over their individual property, while enabling individually initiated actions that affect collective outcomes to be subject to shared scrutiny. At the same time, decision-making thresholds serve to mitigate the risk of a tyranny of the majority. For this system to function effectively, it is essential to minimise the influence of these two underlying drivers identified above and **reduce the costs associated with resident governance**.

The reviewed literature offers a range of policy responses, **emphasising the importance of both direct and indirect state intervention**. These can be grouped into four categories: (1) enhancing transparency, (2) strengthening training and support, (3) reinforcing regulation, and (4) clarifying legal frameworks. In some of the reviewed cases,

such measures have already been implemented in practice.

(1) Enhancing transparency: This includes requiring or incentivising developers to disclose key information during the transition stage, or enabling public authorities to provide regularly updated reputational information about industry actors for prospective buyers. Such measures can reduce the costs for residents in accessing information, making decisions, and taking action.

(2) Strengthening training and support: Providing education and training on MOB governance for residents and committee members can reduce disparities in knowledge and capacity among stakeholders, and enhance residents' ability to identify and respond to emerging issues.

(3) Reinforcing regulation: Strengthening government oversight during the transition stage and establishing qualification and accreditation systems for managing agents can reduce the time and financial costs borne by residents in addressing subsequent governance failures.

(4) Clarifying legal frameworks: Introducing clear legal provisions for specific issues can protect minority interests from potentially adverse collective decisions (e.g., the installation of child safety features), and provide authoritative standards (e.g., defining eligible expenditures within sinking

fund plans).

At the same time, this report suggests that governance risks may continue to emerge even after legislative reform has been introduced. Although legal reform represents a crucial step, it is not sufficient on its own. Many governance problems begin to develop at an early stage, particularly during the development and transition phases before units are sold, and subsequently become embedded through ongoing interactions among multiple stakeholders. This underlines the importance of early-stage intervention, especially measures that enhance transparency, provide training and support, and strengthen regulatory oversight.

Existing evidence suggests that, although transitions to new governance models may present certain challenges, such systems also enable residents to coordinate and develop context-specific ways of living. The role of the state and relevant authorities is therefore to provide adequate support and appropriate intervention to ensure that the conditions for effective resident governance are in place. Importantly, MOB governance should be understood as a dynamic process, requiring ongoing adaptation of strategies and institutional arrangements in response to emerging challenges (Lippert and Steckle, 2016).

## 4.2 Remaining Research Gaps

This report concludes by identifying two topics that remain underexplored in the reviewed evidence. Both are also relevant to MOBs in England and Wales, and further investigation into these areas could inform the transition towards a commonhold system.

(1) Governance models and challenges in mixed-ownership contexts involving public and private actors: Muczyński (2023) provides quantitative evidence from Poland on arrangements where ownership is shared between local municipalities and numerous private owners. However, there remains a lack of empirical research on how these three groups, private owners, public-sector landlords, and residents of public housing, interact and negotiate in everyday governance. This includes issues related to day-to-day management, the operation of collective funds, and participation in decision-making processes. The governance dynamics and potential conflicts arising from such mixed-ownership structures therefore warrant further investigation.

(2) Opportunities and challenges associated with enhanced tenant participation: In dualistic ownership systems, where governance rights are rooted in ownership, the relative invisibility of tenants within resident governance structures is a recurring issue. Although tenants are common occupants of MOBs, they often lack both the formal rights and the incentives to participate in collective governance. At the same time, they may face misaligned interests with landlords, for example, where investor-owners are reluctant to incur additional costs to improve living conditions.

In some cases, tenants are granted more substantive participatory roles. For instance, in Taiwan, tenants may attend annual management meetings and serve as committee members. However, the operational mechanisms of such arrangements, as well as the challenges they entail, remain insufficiently explored. Further research is therefore needed to assess how tenant participation can be effectively integrated into commonhold systems, enabling a more balanced distribution of rights and responsibilities and fostering broader democratic inclusion within MOB governance.

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