This was because the Lands and Surveys Department was fully aware that the assessment fee must eventually be settled at the time of transfer of ownership of the subsidiary titles from the developer to the purchasers.

So, now we request the same proactive move be applied to the subdivided land titles for landed properties.

The requirement by KK City Hall and Local Authorities in insisting the settlement of assessments of **all subdivided land titles** during the surrender of the master land title is a major cause of unnecessary delay in issuance of subdivided land titles for landed properties.

SHAREDA fully understand the problem faced by KK City Hall and Local Authorities in the collection of housing assessment. However, the need to collect assessment should not at the same time delay the registration of subdivided land titles.

As we all know, in order for the Developer to transfer the subdivided land titles to the purchasers, all dues to the government such as quit rent and assessment must be paid.

In our opinion, this has been a very effective way for KK City Hall and Local Authorities to collect back the dues because house buyers are always happy to pay their assessment fees when they know there is a transfer of ownership to them.

So, we therefore appeal to KK City Hall and Local Authorities **not to require the payment of assessment fee during the stage of surrender of master title for landed properties.**

If this is allowed to happen, the registration of subdivided land titles will be speeded up and the Developers can quickly transfer the subdivided land titles to the purchasers and thereby allowing the KK City Hall and Local Authorities to collect the assessment fees during the transfer of ownership.

The quick registration and transfer of subdivided titles to the house buyers will give people a positive impression of the quality of service in the housing industry.

(3) Relaxation in the Conditions of the Housing Developer's Licence in Sabah

Regarding the Housing Developer's Licence in Sabah:-

Ministry of Local Government and Housing (MLGH) have used the **housing developer's licence** to regulate the housing developers to complete the housing project on time in order to **protect the house buyers' interest.**

However, some of the conditions in the **Housing Enactment** are a bit stringent and need some relaxation. For this, SHAREDA would like to request the State Government to consider to relax certain conditions in the Housing Developer's Licence (HDL) to allow Developers to **start site preparation works** such as earthworks and foundation works, before the issuance of the **Housing Developer's Licence**, provided that no sales and marketing activities are involved.

Since there are no sales and marketing activities involved, then the interest of the buyers is not jeopardized.

(i) So, if the developers spend money first, to improve the overall site conditions and also to improve the value of their asset before sales activities are involved, this definitely will be to the advantage of the house buyers.

(ii) Also, this will enable developers to have sufficient time to carry out their site preparation works such as earthworks and foundation works **properly in stages** in order to complete and deliver their project within 24 months, from the date of issuance of the Housing Developer's Licence, of which the **24 months completion period is fixed and stipulated by the Ministry of Local Government and Housing.**

For this relaxation, we request for no time frame for earthworks and 12 months' time frame for foundation works,