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KEY ISSUES AND ROOT CAUSES IN PRE-PROJECT PROPERTY SELLING: A COMPARATIVE ANALYSIS BETWEEN INDONESIA AND MALAYSIA

Seng Hansen[1], Nadrul Shaqman[2] and Lydia Darmiyanti[3]

ABSTRACT

Owning a home, whether a landed house or an apartment, is a dream for many people. Property sales continue to increase every year in line with community needs. One strategy used by property developers is pre-project marketing, in which properties are sold before completion or even before construction begins. Although it offers more competitive property prices, this practice poses various risks and challenges, making it an interesting topic to study. This study aims to investigate the key issues and root causes of recurring pre-project property-selling disputes in Indonesia and Malaysia. Using a comparative case study approach, this study identified seven key issues: abandoned/delayed projects, failed/late unit handovers, consumer financial losses, legal/licensing issues, developer bankruptcy/crisis, weak consumer protection, and government intervention. In addition, this study identified seven root causes: weak project governance, fragile financing structure, risky pre-project sales scheme, weak regulation and oversight, conflicts of interest/ethics, lack of an early warning system, and dependence on the government. The results of this study highlight the social dimension of sustainable housing, focusing on strengthening the property sector and regulatory reforms that protect consumers in both countries.

Keywords: *Marketing strategy; Pre-project selling; Property sector; Risk; Sustainable housing.*

1. INTRODUCTION

Owning a home, whether landed or built, has become a dream for many. This is evident in the increase in property sales over the past two decades (except during the global financial crisis and COVID-19) in various countries, including Indonesia and Malaysia. Property developers have been astutely seizing this opportunity to sell their properties. One frequently employed marketing strategy is pre-project selling. Pre-project selling involves marketing and selling properties to consumers before construction is complete

[1] Associate Professor, Civil Engineering Department, President University, Indonesia, seng.hansen@president.ac.id
[2] Senior Lecturer, Faculty of Business, UNITAR International University, Malaysia, nadrul.shaqman@unitar.my
[3] Senior Lecturer, Civil Engineering Department, President University, Indonesia, lydia.darmiyanti@president.ac.id

or begins. Thus, property developers sell residential units solely on the basis of the design and building plans (Rosalind & Sari, 2022).

This pre-project selling mechanism offers several advantages for both developers and consumers. For developers, it allows them to obtain fresh funding to operate their businesses. For consumers, it offers more affordable prices than finished properties. Despite these advantages, this mechanism poses several risks, especially for consumers who purchase property through this pre-project sales mechanism (Elysia et al., 2020; Rosalind & Sari, 2022).

Ideally, the pre-project selling mechanism comprises four main stages: pre-sale, construction fundraising, project execution, and unit handover. The first stage is pre-sale, where property developers market their units through various promotions and advertisements that showcase the building's design and specifications. The second stage is fundraising, in which property developers raise funds from consumers to finance construction. These funds are collected in the form of advance payments or instalment payments made by consumers who have signed the Sales and Purchase Agreement. The third stage is project execution, in which the property developer carries out the work in accordance with the marketed concept and design. The final stage is the handover of the completed unit to the consumer, marking the end of the pre-project selling practice (Therik & Gultom, 2024).

This pre-project selling mechanism is widely used in developing economies where there is a need for affordable housing for the community. However, consumers must be aware of risks, such as delayed unit handover, halted construction, and weak consumer legal protection in the event of problems. In Indonesia, this pre-project selling mechanism has become popular since the 2000s (Therik & Gultom, 2024), especially in urban areas such as Greater Jakarta (now the world's most populous city), Surabaya, and Medan. Similarly, Malaysia was the first to adopt this mechanism (often referred to as the sale of property under construction) (Basir, 2025), particularly in major cities like Kuala Lumpur, Klang Valley, Johor Bahru, and Penang. However, a number of problems and disputes frequently arise in both countries.

For example, in Indonesia, property disputes frequently involve consumers and developers, as seen in the legal cases involving the Jakarta Tower and the Aspen Peak Residence in Jakarta, the Malioboro Park View apartment in Yogyakarta, and the Meikarta apartment in Cikarang (Hansen, 2025). Similarly, in Malaysia, several cases have occurred, including the Residensi Hektar Gombak in Kuala Lumpur, the Peak Project in Tebrau, the Jade Palace in Banga Bay, and the Sovereign Bay Condominium in Johor Bahru (Ariffin et al., 2019). These cases represent just a few examples of property disputes arising from the sale of property before completion, resulting in losses for consumers who have already paid down payments and instalments or even fully paid off their residential units (Tan et al., 2024; Hansen, 2026).

Previous studies on property-selling disputes have primarily focused on legal compliance (Elysia et al., 2020; Rosalind & Sari, 2022), buyer protection (Therik & Gultom, 2024; Tan et al., 2024; Hansen, 2026), and contractual enforcement (Rahmayanti & Setiawati, 2021; Hansen, 2025), with limited attention to the underlying causes of recurring disputes in pre-project selling practices. Considering the complexity and social impact of this pre-project selling mechanism, it is important to conduct a study that investigates the main issues and root causes arising from this practice.

Moreover, comparative analyses across countries with similar socio-legal contexts are still scarce. Indonesia and Malaysia are selected for their comparable legal systems, rapid growth in property markets, and the prevalence of pre-project selling schemes, making them relevant for cross-country analysis. Therefore, this study aims to fill this gap by identifying the key issues contributing to recurring pre-project selling disputes in Indonesia and Malaysia and analysing the root causes underlying these disputes from legal, contractual, and managerial perspective. Thus, this research is expected to provide theoretical and practical contributions to the social and property markets in both countries and can serve as a reference for similar practices worldwide.

2. METHOD

To achieve these objectives, this research employed a narrative review and comparative case study approach. A narrative review is a descriptive literature review approach that provides an initial understanding of a research topic by synthesising existing literature. Narrative reviews emphasise the ability to integrate diverse literature to obtain findings and perspectives relevant to the research objectives (Snyder, 2019). This approach is reinforced by comparative case studies, which provide a deeper understanding of the research topic through real-world examples.

In this study, a protocol comprising six steps is implemented (Figure 1). The first step is identifying the topic/problem formulation and research objectives. In this research, the topic is the issues and root causes of pre-project property selling in Indonesia and Malaysia. The second step is case selection, which involves identifying and selecting several problematic actual cases relevant to the research topic. Next is data collection, which is conducted extensively by gathering data from various sources. The research sources in this study include scientific articles, government reports, national media news, and court decisions/legal documents. The fourth step is to assess the reliability and relevance of each collected source to ensure the information is accurate and relevant to the research topic. The fifth step is thematic analysis, where the collected information is grouped by theme and analysed narratively to identify relationships, comparisons, and meanings. The final step is to develop a narrative that reports the findings and answers the research questions.

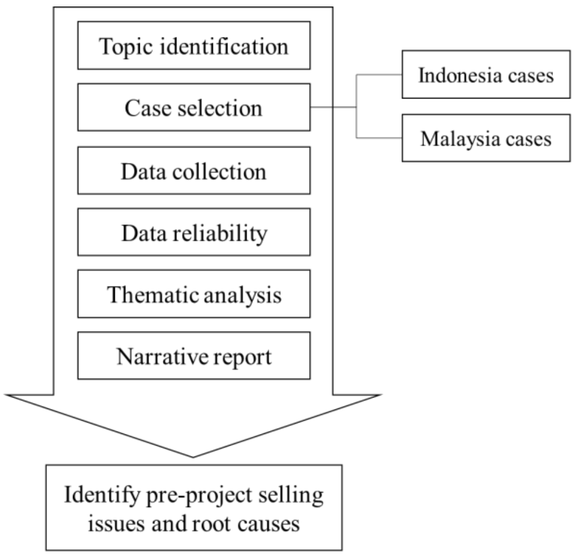

Figure 1: Research protocol

Table 1 displays the case studies used in this research. These four case studies were selected based on several considerations, including project scale (medium to large), geographic location (across different cities and countries), and legal system (civil-law and common-law countries). Case 1 is the Meikarta Area development project in Indonesia, a mega-project located in the Greater Jakarta area and managed by a private developer. Case 2, also representative of the Indonesian context, is the Malioboro Park View apartment project, a mid-scale project by a private developer in Yogyakarta. Case 3 represents the Malaysian context: the Sovereign Bay project in Johor Bahru, managed by a private developer in collaboration with foreign partners. Case 4 is the Residensi Hektar Gombak project in Kuala Lumpur, initiated by the Malaysian government. The diversity of the selected cases allows for comparative analysis across countries and project types so the research findings are not limited to a single or local case. This also provides broader global insights.

Furthermore, the selection of these four cases was based on sufficient public documentation, including government reports, court decisions and media coverage. Comprehensive documentation makes the findings more objective and verifiable, and allows for chronological arrangement. Some cases have even been used as study material in various scientific articles, for instance, the Residensi Hektar Gombak Project by Ariffin et al. (2019), the Meikarta Project by Therik and Gultom (2024), and the Malioboro Park View Project by Hansen (2025).

Data collection was conducted using a targeted literature review approach that focused on selected case studies. The literature was collected selectively based on its relevance to each pre-project property sale dispute case analysed. Inclusion criteria included literature discussing similar dispute contexts, legal frameworks, and property sale practices during the pre-project stage related to the cases studied. Literature irrelevant to the case context was excluded from the analysis. The selection process was carried out systematically by examining publication sources and supporting documents to ensure the information was appropriate and credible. This approach was chosen as it allows for a more in-depth and contextual analysis of each case studied.

Table 1: Case study profile

Code	Case 1	Case 2	Case 3	Case 4
Country	Indonesia	Indonesia	Malaysia	Malaysia
Project name	Meikarta Project	Malioboro Park View Project	Sovereign Bay Project	Residensi Hektar Gombak Project
Location	Cikarang	Yogyakarta	Johor Bahru	Kuala Lumpur
Start	2017	2016	2015	2018
Planned completion	2019-2020	2018	2019	2022
Status	It was stalled, now it's been continued again	Stalled	It was stalled, now it's been continued again	It was stalled, now it's been continued again

3. RESULTS

3.1 CASE 1: THE MEIKARTA PROJECT

The Meikarta Project is a mega-development comprising vertical residential and multipurpose developments. With a total investment of IDR 278 trillion, the project has been aggressively promoted through pre-project sales since 2017, attracting thousands of buyers. The project, initiated by PT Lippo Cikarang Tbk, is located in Cikarang, Bekasi, West Java, with a planned area of 5,000 hectares (Putri & Pratiwi, 2022). However, during its development, the mega-project encountered obstacles that led to its suspension (Asmaaysi, 2025a).

One of the main issues facing the project was the delay in handing over apartment units to buyers who had made instalment payments or paid in full through the pre-project sales system (Juwita, 2025b). Even after the handover deadline passed, the project showed no significant progress, leading to consumer complaints that described it as stalled (Asmaaysi, 2025b). According to the Ministry of Housing and Settlement (PKP), hundreds of consumers filed complaints and requested refunds for their payments (Saputra, 2025).

Another issue facing the project was corruption in the acquisition of land and building permits. This practice was uncovered by the Corruption Eradication Commission (KPK) and led to the arrest of local government officials and company leaders. This contributed to delays and damaged the project's credibility, as it was marketed even though it had not yet obtained all required permits (Lukita & Pusparisa, 2025).

On the other hand, the Meikarta megaproject requires significant investment funds. However, negotiations for foreign investment failed, forcing the developer to restructure its funding (Juwita, 2025a). This is also slowing work progress, leading to delays in project completion. Another frequently raised issue was the lack of transparency in information provided to consumers, particularly regarding project progress, certainty of unit delivery, and the legal status of unit certificates.

Prolonged conflicts and complaints have led many consumers to question the ineffectiveness of regulations and consumer protection (Simamora et al., 2024). In 2025, the government, through the Ministry of Housing and Settlement (PKP) and related agencies, attempted to facilitate mediation between consumers and the company. Some consumers have received early refunds as part of the resolution process.

3.2 CASE 2: THE MALIOBORO PARK VIEW PROJECT

The Malioboro Park View project is a mid-scale apartment project in Sleman, Yogyakarta. It was managed by a private property developer and marketed from 2016 to 2018 through a pre-project selling system. This strategy successfully attracted hundreds of consumers who purchased units with either cash or credit. However, several serious problems arose, causing the project to stall (Leon, 2025).

The most significant issue was the failure to hand over apartment units to buyers. Many buyers had already paid in full for their units. Unfortunately, the apartment units were not yet complete, and the building sustained extensive damage due to the developer PT's neglect. Malioboro Ensu Sejahtera. The developer was declared bankrupt by the Semarang Commercial Court in 2021. This further complicated the situation for consumers, as the developer failed to fulfil its obligations (Harminanto, 2025b).

Consumers also demanded accountability from the Bank BTN Yogyakarta Branch for disbursing loans (KPA) and supporting project financing, despite the project being deemed problematic and lacking complete permits. This led consumers to demand repayment of the loan funds and accountability from the bank for unclear ownership (Sihono, 2024).

Allegations of fraud stem from the fact that the project was marketed through a pre-project selling mechanism despite not yet having a building permit (Palupi, 2025). Unfortunately, several consumers who stopped making instalment payments encountered issues with their Bank Indonesia (BI) credit records, which negatively affected their access to bank loans and credit. Consequently, hundreds of consumers sought assistance from the Yogyakarta Special Region (DIY) Regional People's Representative Council (DPRD) to resolve the disputes (Harminanto, 2025a). They even reported the alleged fraud to the Yogyakarta Regional Police against the developer, the bank, the curator, and the notary involved.

3.3 CASE 3: THE SOVEREIGN BAY PROJECT

The Sovereign Bay project is a waterfront condominium project located in Johor Bahru, Malaysia. The project began marketing in mid-2010 and attracted interest from buyers in Malaysia and Singapore. The project was initiated by UE E&C Sanjia (M) Sdn. Bhd., a joint venture between Sichuan Sanjia Real Estate Group of China and UE E&C of Singapore (Yusof, 2025).

The project was originally scheduled for completion in October 2019, but the building remains unfinished. The project was even categorised as abandoned by the Malaysian Ministry of Housing and Local Government due to its failure to complete within the planned timeframe and the absence of significant construction activity for more than six consecutive months (Ali, 2021).

This case highlights structural issues in the Malaysian property sector, particularly in large-scale projects involving foreign investors, joint-venture developers, and cross-border buyers. As in Indonesia, uncertainty regarding project completion and poor communication led to conflicts between developers and buyers, which escalated into disputes. However, the financial losses were borne more heavily by buyers, underscoring the need for stronger consumer protection and stricter government oversight in the Malaysian property sector.

3.4 CASE 4: THE RESIDENSI HEKTAR GOMBAK PROJECT

The Gombak Hectares Residency project in Kuala Lumpur is a housing project initiated by the Malaysian government. It consists of five 46-story residential blocks, each with 2,400 units. As part of the government initiative, the project was marketed in 2018 at affordable prices, resulting in immediate sell-out (Basir, 2025).

However, the project encountered various challenges during its execution, resulting in delays in completion (Selvam, 2024). According to the Sale and Purchase Agreement, the completion date was May 2022. However, the project remains unfinished. Consequently, the Malaysian Housing Authority (MPA) has classified the project as a "sick" project (KPKT, 2024).

In 2025, the Ministry of Housing and Local Government (KPKT) injected RM125 million into the project to continue (KPKT, 2025). This case demonstrates that even government-initiated projects are not free of issues, including funding constraints and delays, and that government intervention is required to address them.

4. DISCUSSION

Through the analysis, seven key issues were identified in pre-project selling practices in both countries. Table 2 presents a comparison of these seven issues across each case study. The first and most prevalent issue was the abandonment or delay of projects. This issue arose in all cases due to the project's delayed progress. In Malaysia (Cases 3 and 4), the projects were even classified as sick projects. Meanwhile, in Indonesia (Cases 1 and 2), there was no specific government classification, but the public generally considered the projects stalled. By the end of 2025, Cases 1, 3, and 4 had resumed, but Case 2 remained stalled with no clarity for buyers.

The second issue was failed/late unit handovers resulting from delayed/abandoned projects. This issue highlights the failure to deliver the purchased property units, even though they have fulfilled or fully paid their obligations. This also relates to the third issue, consumer financial losses. Buyers are forced to bear economic losses due to ongoing bank instalments, loan interest, and other unnecessary costs, such as temporary rental fees and dispute-resolution fees. In Case 3, which involved a foreign buyer, the losses were felt across borders.

Further legal and licensing issues tended to emerge more frequently in cases in Indonesia than in Malaysia. In Case 1, a criminal case arose due to bribery in obtaining permits, while in Case 2, there were also problems with permits that had not yet been processed, but the project had already been marketed through pre-project selling mechanisms. Issues of developer bankruptcy/crisis also emerged, particularly in Case 2, where the developer was declared bankrupt by the court. In Cases 1, 3, and 4, developers faced funding difficulties that hampered project progress.

The final two issues, weak consumer protection and government intervention, also emerged in all cases, but with varying intensity. In Cases 1 and 2, buyers sought legal assistance from the Consumer Protection Agency, ministries, and even the House of Representatives (DPR) to resolve delayed project completion. This was also the case in Case 3, which involved a cross-border buyer, and Case 4, which involved a government project.

Table 2: Comparative analysis of pre-project selling issues

Key Issues	Case 1	Case 2	Case 3	Case 4
Abandoned/Delayed Projects	Dominant	Dominant	Dominant	Dominant
Failed/Late Unit Handovers	Dominant	Dominant	Dominant	Dominant
Consumer Financial Losses	Dominant	Dominant	Dominant	Dominant
Legal/Licensing Issues	Dominant	Dominant	Not Dominant	Not Dominant
Developer Bankruptcy/Crisis	Not Dominant	Dominant	Dominant	Dominant
Weak Consumer Protection	Dominant	Dominant	Dominant	Dominant
Government Intervention	Dominant	Not Dominant	Dominant	Dominant

Next, this study investigates the root causes of issues in pre-project selling practices. In general, case analysis in both countries reveals similar root causes, stemming not only from legal violations but also from weak governance structures and business models.

There are at least seven root causes of various pre-project selling issues, as presented in Table 3.

Poor project governance is the primary root cause, as many property projects are implemented without a robust project governance system. This is indicated by unrealistic planning, inefficient time and cost control, weak internal oversight, and the absence of early risk management. Property developers often focus on aggressive marketing without adequate financial preparedness. Case 1 illustrates how a megaproject can be marketed without complete permits and stable governance. Case 2 also demonstrates licensing and project control issues that lead to project stagnation and developer bankruptcy. Case 3 involves the management of a cross-border project (Singapore, China, and Malaysia) without effective coordination. Meanwhile, Case 4, a government-initiated project, continues to experience weak oversight of project implementation.

The second root cause is a fragile financial structure, with projects relying on pre-project sales as a primary source of cash flow, long-term bank loans, and foreign investment, all of which are unstable. When obstacles (whether related to permits, capital, or legal issues) arise, project funding is disrupted, and the project is halted, resulting in losses for consumers. Case 3, for example, is a project heavily reliant on foreign capital. Case 2, on the other hand, shows how debt far exceeded the asset value, leading to the developer's bankruptcy. Case 1, a mega-project with enormous financing needs, failed to secure foreign investors, while Case 4 required a government bailout. This demonstrates that pre-project financing for sales is risky and financially unsustainable.

Undeniably, the practice of pre-project sales carries high risks, as units are sold before construction is completed, and the legal system offers no robust guarantees in the event of developer default. Thus, the project risk is transferred to consumers. This is evident in all cases where large sales were made despite incomplete permits (Cases 1 and 2) and without precautions (Cases 3 and 4).

Although Indonesia and Malaysia both have regulations regarding property marketing through pre-project sales mechanisms, oversight remains weak, and sanctions are not stringent. This creates a moral hazard for developers. This is evident in all cases. The permit violation in Case 1 was only addressed after it reached the legal realm. In Cases 2 and 3, no quick solutions were implemented to address the existing problems, leading to customer complaints and even legal disputes. Meanwhile, in Case 4, government intervention only occurred after the crisis.

In several cases, unhealthy relationships were discovered between developers and officials to expedite permit issuance (Case 1), and business decisions were found to be unfounded or based on technical feasibility or professional negligence (Case 2). This suggests conflicts of interest and unethical practices in Indonesia. On the other hand, the Malaysian cases reflect systemic weaknesses rather than explicit criminal violations.

Another key factor is the lack of an early warning system to detect project delays, halt sales early, and protect new buyers from the risk of project failure, which contributed to these pre-project sales problems. For example, in Cases 1 and 2, sales proceeded despite emerging problems. Similarly, in all cases, buyers remained bound by their obligations even if project progress stalled.

When projects failed or encountered obstacles, the solution almost always involved government mediation, bailouts, or state rescue. This demonstrates the failure of market mechanisms and private contracts to function effectively. This reliance on government intervention is evident in Case 1, where the government facilitated refund negotiations with the developer; Case 2, where buyers requested the Regional People's Representative Council (DPRD) and authorities to intervene to complete the stalled project; Case 3, where the Ministry requested intervention; and Case 4, where the government intervened directly.

Table 3: Comparative analysis of root causes

Root Causes	Case 1	Case 2	Case 3	Case 4
Weak project governance	Dominant	Dominant	Dominant	Dominant
Fragile financing structure	Dominant	Dominant	Dominant	Dominant
Risky pre-project selling	Dominant	Dominant	Dominant	Dominant
Weak regulation and oversight	Dominant	Dominant	Dominant	Dominant
Conflicts of interest/ethics	Dominant	Dominant	Not Dominant	Not Dominant
No early warning system	Dominant	Dominant	Not Dominant	Not Dominant
Dependence on the government	Dominant	Dominant	Dominant	Dominant

The findings show both alignment and divergence with existing literature. Consistent with prior studies, issues such as project delays, failed unit handovers, and consumer financial losses confirm that pre-project property selling inherently carries significant risks, particularly due to uncertainties in construction progress and financing structures (Elysia et al., 2020; Rahmayanti & Setiawati, 2021; Adagba et al., 2023; Hansen, 2026). These similarities reinforce the argument that such disputes are not isolated cases but represent recurring patterns identified in previous research.

However, this study also reveals several important differences. While existing literature tends to emphasise legal and contractual dimensions (Rosalind & Sari, 2022; Hansen, 2025), the findings highlight deeper structural root causes, including weak project governance, fragile financing models, and the absence of early warning systems. These factors demonstrate that the problem extends beyond legal non-compliance, pointing instead to systemic weaknesses in how property projects are planned, financed, and monitored (Chawla & Kumar, 2022; Wang, 2024).

In addition, this study offers unique comparative insights between Indonesia and Malaysia. In the Indonesian context, disputes are more strongly associated with regulatory enforcement gaps, explicit legal violations, and ethical issues such as conflicts of interest (Elysia et al., 2020; Simamora et al., 2024; Therik & Gultom, 2024). In contrast, the Malaysian cases reflect more systemic and institutional weaknesses, supported by relatively more structured regulatory mechanisms, such as formal project classification, although implementation challenges remain (Ariffin et al., 2019; Mohamad & Hassan, 2020). These differences can be attributed to variations in governance practices, regulatory enforcement, and market structures in both countries, highlighting the importance of context-specific approaches in addressing pre-project property-selling disputes.

The findings of this study suggest that problematic property projects are not accidental but rather represent structural problems in the governance of property development and financing. The theoretical implication is the need to strengthen the analytical framework for property projects, focusing not only on financial and technical feasibility but also on governance (transparency and accountability), risk management and consumer protection as key variables (Chawla & Kumar, 2022; Wang, 2024). Therefore, this study enriches the literature on project management and property economics, particularly in developing countries that still rely on pre-project sales practices.

From a policy and regulatory perspective, the findings of this study imply the need to reform the property consumer protection system by strengthening oversight from the early stages of a project, restricting unit sales before the project is ready, and imposing strict sanctions on developers who fail to fulfil contractual obligations. Furthermore, the government needs to establish an early warning system that tracks the physical progress and financial health of projects and developers, enabling interventions before projects are ultimately halted or abandoned. This will minimise the risk of consumer losses.

This research has important practical implications for property developers, banks, and investors, encouraging them to apply stronger prudential principles in the financing and implementation of property projects. Developers are urged to improve project governance and transparency, while financial institutions need to conduct due diligence that focuses not only on collateral value but also on the project's long-term sustainability. For consumers, these findings underscore the importance of legal and financial literacy in property transactions, ensuring that purchasing decisions are based not only on price and promotions, but also on the developer's legality and credibility.

5. CONCLUSIONS

This research highlights real-world problems that frequently occur in the property sector. By examining four problematic property projects in Indonesia and Malaysia, this study offers a comprehensive and practical perspective on the issues and root causes of pre-project selling practices. The analysis shows that project failures are not solely the fault of property developers, but rather reflect systemic problems in project governance, financing structures, and consumer protection mechanisms in the property sector, which relies on pre-project sales. The recurring pattern of stalled projects, delayed deliveries, consumer financial losses, and government intervention underscores the need for comprehensive reforms to property regulations, oversight and business practices. Without these structural improvements, the risk of similar cases recurring remains high, eroding public trust in the property industry.

The practice of pre-project selling, which has become a crucial tool in the development of the property sectors in Indonesia and Malaysia, still faces fundamental problems that require urgent addressing, including weak project governance, fragile financing structures and weak regulation and oversight. Legal differences between Indonesia and Malaysia do not fully address the disputes arising from this practice, as the root causes are not only normative but also structural and managerial. Understanding these root causes is crucial not only for regulators but also for developers and financial institutions to ensure that future pre-sale home marketing practices are more sustainable and ethical. Furthermore, pre-sale policy reforms should highlight public transparency, financial oversight, and effective consumer protection.

Thus, this research has clear significance both academically and practically. Academically, this study contributes to the literature on pre-project property sale disputes by identifying key issues and root causes that have not been widely studied, particularly in a comparative context across developing countries. In practice, the results of this study are expected to inform stakeholders, including developers, consumers, and regulators, in formulating dispute-prevention strategies and improving the effectiveness of existing policies and practices.

On the other hand, it is worth noting that this study has several limitations. First, the number of case studies remains limited, making it less representative of all pre-project property selling practices in Indonesia and Malaysia. Second, the approach used is a targeted, case-based literature review, thus heavily dependent on the availability and quality of data from existing sources. Third, this study did not include direct empirical data such as interviews with all stakeholders, thus the perspectives obtained are still limited. Therefore, future research is recommended to use a larger number of cases and a mixed-methods approach to obtain more comprehensive results.

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