

Rechtvacuum in the Regulation of Ownership Rights for Underground Space in Jakarta

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Abstract. *As space decreases in urban areas, it is necessary to use spatial planning which is also able to dynamically follow the needs of the community, this is actually done through the use of underground space. This has been done in DKI Jakarta, however the use of underground space in DKI Jakarta is not yet in line with the established regulations regarding the use of underground space. The provisions in DKI Gubernatorial Regulation Number 167 of 2012 concerning Underground Space do not regulate the underground land ownership system and PP No. 18 of 2021 concerning Management Rights, Land Rights, Flats and Land Registration does not regulate equal distribution of rights for each group in obtaining benefits from underground space, this is because the party that can only have the right to use underground space in PP No. 18 of 2021 concerning Management Rights, Land Rights, Flat Units, and Land Registration are only private parties who collaborate with the government in using underground space. The method used in this thesis research is Juridical Sociology. Sociological Juridical Research, is a research method that seeks to describe and interpret objects as they are, with the aim of systematically describing the facts and characteristics of the research object being studied accurately. So that it can be analyzed further based on the data or materials obtained. Based on the study conducted, it was found that the current lack of regulation regarding ownership of underground spaces has resulted in neglect of justice for underground space users. Especially in the context of social justice for all Indonesian people according to Pancasila. In material-substantial and intrinsic terms, Pancasila is philosophical. For example, the essence of human principles that are just and civilized, not to mention the values in the principles of belief in the Almighty God and the values in other principles.*

Keywords: *Rechtvacuum; Regulation; Soil; Space.*

1. Introduction

As the population increases along with the need for land to support the livelihoods of the Indonesian population, an alternative use of land is needed amidst land

limitations due to spatial planning that is not comparable to the increasing population to support population activities, especially in terms of fulfilling the population's needs for a decent living. This can be observed with the shrinking of agricultural areas every year by 250 hectares, this will clearly disrupt the function of land as a means of guaranteeing food availability for the population whose population is increasing.¹The use of underground space is a new alternative in answering this problem. The idea of the birth of underground space use rights as a new rights institution has long been initiated by one of the Indonesian agrarian law experts, the late Boedi Harsono. According to the author, his idea is based on the assumption that in the future or now, the use or utilization of land areas will be increasingly limited. The limited land is due to the flow of urbanization, especially to big cities that require an increase in the provision of residential areas for both personal and business interests. This idea has proven true that it is increasingly difficult to find land areas to be utilized with the status of primary land rights. As is known, the control and use of land by anyone and for any purpose must be based on the basis of land rights regulated in national land law in accordance with the legal status of the person controlling and the designation of the use of the land. Currently, the land rights available for use in urban areas are ownership rights, building use rights and use rights which are primary land rights, meaning those granted directly by the State. In addition, there are various secondary rights that can be granted by the party who owns the land to another party, such as building use rights, use rights and lease rights for buildings.²

The legal relationship between the holder of land rights and the underground space is located at the entrance and exit between the earth's surface and the underground space. If the space above the earth's surface and the underground space are owned by the same person, it does not cause a problem because the underground land rights follow the parent, namely the land rights above the earth's surface. Problems arise when there is a difference in ownership between the space above the earth's surface and the underground space. Buildings that require space in the earth's body that are physically unrelated to the buildings on the earth's surface above them, for example buildings for business activities such as shops, restaurants, stations and underground railways and others. To enter and exit the space in question, it is necessary to use part of the earth's surface for the location of the door. However, because the main part of the building structure is in the earth's body, the contents of the authority derived from land rights as stipulated in Article 4 of the UUPA cannot be interpreted as also the existence and control of underground buildings. The UUPA basically does not explicitly regulate the use or utilization of underground space (the earth's body) for the purposes of

¹ <https://www.handaselaras.com/consolidation-lahan-Solusi-keterbatasan-tanah-untuk-permukiman-di-perkotaan/>, accessed April 12, 2022.

²Boedi Harsono, Indonesian Agrarian Law: History of the Formation of the Basic Agrarian Law, Contents and Implementation, Rev. Ed., 7th ed., Djambatan, Jakarta, 1997, p. 416.

building construction. However, this does not mean that the State does not have a basis or authority to provide it or does not even rule out the possibility of constructing underground buildings. If we look again at Article 2 Paragraph (2) of the UUPA, especially in letter b which is used as the basis and also as a source of regulation for Article 4 Paragraphs (1) and (3) and Article 8 of the UUPA, in this article the word "earth" is mentioned as one of the objects of regulation. The construction of underground buildings mostly uses the cut and fill method, this is clearly contrary to

Article 1 number 4 and Article 13 Paragraph (2) of the PP on Land Use which mentions the prohibition on carrying out 'cut and fill'. 'Cut' in this context can mean digging, displacing or cutting certain topography and the like. As for 'fill' can mean filling, and the like. Here it is seen that there is a lack of supervision from the government and the absence of sanctions for the violation of the prohibition. Then, other uses of underground space occurred in Jakarta for MRT, and Karebosi Link in Makassar. Based on the Regional Regulation of DKI Jakarta Province Number 3 of 2008 concerning the Establishment of a Regionally-Owned Enterprise (BUMD) Limited Liability Company (PT) MRT Jakarta (as amended by Regional Regulation Number 7 of 2013 concerning Amendments to Regional Regulation Number 3 of 2008 concerning the Establishment of a Regionally-Owned Enterprise (BUMD) Limited Liability Company (PT) MRT Jakarta) and Regional Regulation Number 4 of 2008 concerning Regional Capital Participation in Limited Liability Company (PT) MRT Jakarta (as amended by Regional Regulation Number 8 of 2013 concerning Amendments to Regional Regulation Number 4 of 2008 concerning Regional Capital Participation in Limited Liability Company (PT) MRT Jakarta), the DKI Jakarta Regional Government delegates its authority to PT MRT to build MRT transportation that uses underground space. The same thing happened in Makassar. The Makassar City Government has the right to control the State where the right is derived from the rights of the Indonesian people to land that has a public element, in this case the Karebosi Field. More specifically, the rights held by the Makassar City Government to the Karebosi Field land are Land Management Rights.³ However, there are no clear rules regarding the concept of basement ownership and basement use permits to date. This situation will clearly result in a high number of land disputes in the future.

2. Research Methods

This thesis is Juridical Sociology. Juridical Sociology Research is a research method that attempts to describe and interpret objects as they are, with the aim of systematically describing the facts and characteristics of the research objects studied precisely. So that it can be further analyzed based on the data or materials

³Ismail Alrip, Regulation of Underground Space Utilization, Faculty of Law, Hasanuddin University, Makassar, 2018, pp. 6-7.

obtained.⁴

3. Results and Discussion

3.1. Regulations Concerning the Right to Control Underground Space

Indonesia in the period before 1960 recognized the existence of legal dualism in the field of Agrarian Law with the simultaneous application of Western Law and Customary Law. The application of these laws was based on the division of population groups as stipulated in Article 131 and Article 163 of the Indische Staats Regeling. This immediately changed when Law of the Republic of Indonesia Number 5 of 1960 concerning Basic Agrarian Regulations was enacted. Law of the Republic of Indonesia Number 5 of 1960 concerning Basic Agrarian Regulations has a function in addition to regulating human activities related to land as a manifestation of the regulatory function of law, also directing these activities towards achieving the desired goals as a manifestation of the "social engineering" function of law. This is clear from the provisions of Article 2, Article 6, Article 7 and Article 11 in the Republic of Indonesia Law Number 5 of 1960 concerning Basic Agrarian Principles which stipulates that land regulations by the state must be directed towards achieving the greatest prosperity of the people. Likewise, legal relations between humans and land and legal relations between humans from various fields related to land, are not justified only for the prosperity of certain parties, but must run fairly and in balance. The aspects of justice and balance are certainly very necessary for every individual in using, maintaining, and fighting for their legal rights in controlling, enjoying, and taking advantage of a piece of land which is legally their right (the owner). The use of underground space is quite an interesting phenomenon. Because although the use of underground space has been quite a lot in recent decades, especially in urban areas, such as the construction of the MRT (subway) in Jakarta and other uses such as in Surabaya including the city of Semarang, where the population is increasingly dense accompanied by increasingly complex needs and economic activities while strategic locations are increasingly limited. On the other hand, the government's efforts to make a regulation on this matter do not seem to exist yet, while the Republic of Indonesia Law Number 5 of 1960 concerning Basic Agrarian Regulations that is currently in effect does not explicitly regulate it. Ironically, even in the Draft Law on Land which is said to be a "refinement" of the Republic of Indonesia Law Number 5 of 1960 concerning Basic Agrarian Regulations, it has not regulated this matter. In fact, this problem involves various aspects that are quite complex which if no regulation is made will cause difficulties in the future. These aspects include legal aspects regarding ownership, rights

⁴Bambang Sunggono, 2006. *Legal Research Methodology*, Jakarta: PT Grafindo Persada, p. 116.

status, authority, certification, legal protection and technical aspects such as the suitability of buildings that guarantee the security, health, safety and comfort of residents and people inside. Some of the provisions in the Republic of Indonesia Law Number 5 of 1960 concerning Basic Agrarian Principles are indeed said by some legal experts to be no longer in accordance with the current context, where the issues to be regulated by law are increasingly complex so that they require a more progressive written legal reach.

Land law is an independent field as an independent branch of legal science that has its own place in the national legal system, the substance of which is the entirety of written and unwritten legal provisions regarding land ownership rights as legal institutions and as concrete relationships, with public and civil aspects, which can be arranged and studied systematically, so that the whole becomes one unit. The aspect of land ownership as part of the social contract theory in determining the rights to a plot of land, who is the first occupant, is a determining factor. The use of space above ground becomes a trend when population density increases, the need for land is high and prices become expensive. The phenomenon of development in big cities that utilizes space above ground and underground space is often found, including the construction of the Blok M Mall shopping complex where the ground space is for economic activities and the upper space is used for public transportation, the construction of the Pondok Indah pedestrian bridge which has shops above the crossing, the construction of stacked roads, and so on. According to Sapto Hermawan and Supid Arso Hananto, in their writing entitled "Arrangement of Underground Space based on National Agrarian Principles", one of the legal problems related to the use of underground space is the ownership of underground space. Land ownership regulations in Indonesia are generally regulated in Article 33 paragraph (3) of the 1945 Constitution of the Republic of Indonesia in conjunction with Article 2 in conjunction with Article 4 paragraph (2) of the Republic of Indonesia Law Number 5 of 1960 concerning Basic Agrarian Regulations, which states that the State controls the earth and water and the natural resources contained therein and the State determines the various rights to the surface of the earth (land), then the State grants rights to the land to people, either alone or together with other people and legal entities, where the parties have the right to use the land in question, likewise the body of the earth and water and the space above it are only needed for interests directly related to the use of the land. Article 33 paragraph (3) of the 1945 Constitution of the Republic of Indonesia, Article 2 of the Republic of Indonesia Law Number 5 of 1960 concerning Basic Agrarian Regulations and Article 4 explicitly only regulate the basis of land rights above the surface of the earth. This needs to be a concern for the government and related stakeholders, at least in realizing the enactment

of the Draft Law on Land which has been rolling for 2 years but there has been no certainty of enactment until now. The Draft Law on Land in 2019 contains regulations regarding land rights, one of which arises from the legal relationship between the rights holder and the underground space to control, own, use, and utilize, and maintain underground space. The Draft Law on Land also regulates the types of rights for the use and utilization of Land by different rights holders in underground space, namely Building Use Rights (HGB) or Use Rights (HP), while if the rights holders are not different, then the rights granted are HGB on the underground space or HP on the underground space. However, before the Draft Law on Land is enacted and has legal coercive power as a solution to the national legal vacuum related to the regulation of underground space rights in Indonesia, the regulation needs to be reviewed academically from a land law perspective. With the enactment of the Law on Land (which is currently still in the draft stage), it is hoped that it can become the attention of regional heads to issue regional regulations or policies that specifically regulate the use or utilization of underground space. The use of underground space is basically based on the principle of horizontal separation. The concept of horizontal separation of land controlled by the state that is not specifically regulated in the laws and regulations. The principle of horizontal separation basically states that buildings and plants are not part of the land so that when connected with the granting of land rights, the ownership of the land with the buildings and plants above can have different ownership. Based on the principle of horizontal separation, it is possible that in the same plot of land there are several land ownership rights simultaneously. The problem of the principle of horizontal separation will arise if there is a case where after the secondary rights have ended, the owner of the ownership rights wants to cultivate the land himself, of course the choices that can be made regarding the land will be very limited considering that there is a large building standing.

The absence of regulation regarding the ownership of underground space has resulted in the neglect of justice for underground space users. Especially in the context of social justice for all Indonesian people according to Pancasila. Materially-substantially and intrinsically, Pancasila is philosophical. For example, the essence of the principle of just and civilized humanity, not to mention the values in the principle of Belief in the Almighty God and the values in the other principles. All of them are metaphysical/philosophical in nature, in the cultural system of pre-independence Indonesian society and still ongoing until now and should be in the future, the values of Pancasila are recognized as a philosophy of life or a way of life that is practiced. This issue of injustice can be seen in the case of the use of basements for buildings, namely the Boarding House/Boarding House on Jalan Csitu Lama XI and on Jalan Cipaku Permai,

showing that individuals who hold land rights, namely ownership rights, who use basements are clearly permitted based on the provisions stated in Article 4 Paragraph (2) of the UUPA. However, this article does not provide sufficient direction and limitations on the use of basements. The UUPA does not explicitly regulate the use or utilization of basements (the earth's body) for the purposes of building construction. However, this does not mean that the State does not have a basis or authority to provide it or even close the possibility of building construction underground. If we look back at Article 2 Paragraph (2) of the UUPA, especially in letter b which is used as the basis and also as a source of regulation for Article 4 Paragraphs (1) and (3) and Article 8 of the UUPA, in this article the word "earth" is mentioned as one of the objects of its regulation. The definition of Earth as stated in Article 1 number 4 of the UUPA which states that "in the definition of earth, in addition to the surface of the earth, also includes the body of the earth beneath it and that which is under water". Article 1 number 4 and Article 2 Paragraph (2) letter b do not limitatively detail or mention the designation and use of the body of the earth. Thus it can be interpreted that the designation and use of the body of the earth is not only for the extraction of natural resources contained therein, but is also possible for other interests, including the use of the designation of building construction. Meanwhile, the use of basements by means of "cut and fill" as in the example of the Boarding House case on Jalan Cisitua Lama XI, has violated the provisions of Article 1 number 4 and Article 13 Paragraph (2) of the PP on Land Use which mentions the prohibition on carrying out "cut and fill". "Cut" in this context can mean digging, displacing or cutting certain topography and the like. Meanwhile, "fill" can mean filling, and the like. This will result in damage to the soil structure automatically this will also result in damage to the function of the soil.⁵

3.2. **Obstacles and Solutions in the Regulations Regarding the Granting of Rights to Ownership of Underground Space in the Jakarta Area**

Article 1 number (7) of DKI Regional Regulation No. 167 of 2012, The space in the earth is the space below the surface of the earth where humans carry out their activities. Based on Article 4 of DKI Jakarta Governor Regulation Number 167 of 2012 concerning Underground Spaces, it states that underground spaces consist of shallow underground spaces which are spaces below the ground surface up to a depth of 10 meters and deep

⁵Ires Amanda Putri, "Principle of Horizontal Separation in the Utilization of Underground Space Based on Indonesian Land Law (Legal Review of Supreme Court Decision Number 740 K/Pdt/2009, Supreme Court Decision Number 292 PK/Pdt/2009, Supreme Court Decision Number 2030 K/Pdt/2003)", Jurnal Pendek, Depok, Faculty of Law, University of Indonesia, 2013, p. 16. Downloaded from <http://www.lib.ui.ac.id/naskahringkas/2015-08/ires%20amanda%20putri>, May 12, 2023.

underground spaces which are spaces below the ground surface from a depth of more than 10 meters up to the limit of technological mastery in the utilization of underground spaces or limitations in accordance with the provisions of laws and regulations. According to DKI Jakarta Governor Regulation No. 167/2012, activities permitted in shallow underground spaces are:

- a. MRT station access;
- b. road infrastructure network system;
- c. utility network system;
- d. office area;
- e. parking facilities;
- f. trade and services;
- g. supporting activities of the building above it; and
- h. the foundation of the building above it.

Activities permitted in the basement include:

- a. rail-based mass transit system (MRT);
- b. road infrastructure network system;
- c. utility network system; and
- d. the foundation of the building above it.

The provisions in DKI Regional Regulation Number 167 of 2012 concerning Underground Space do not regulate the underground land ownership system, such a situation will result in underground land ownership disputes and will also result in increasing uncontrolled underground land use, this will clearly result in environmental damage in this case the soil structure so that the surface of the land above it will also be at risk of damage and loss of function. Ownership of underground space is made possible by the existence of Government Regulation No. 18 of 2021 concerning Management Rights, Land Rights, Apartment Units, and Land Registration. Article 1 number (7) of Government Regulation No. 18 of 2021 concerning Management Rights, Land Rights, Apartment Units, and Land Registration states:

Basement is a space located below the surface of the land which is used for certain activities, the control, ownership, use and utilization of which is separate from the control, ownership, use and utilization of the land area.

The Utility Network Project built by the DKI Jakarta Provincial Government in practice is not carried out directly by the Provincial Government. Limited resources and budget make this Utility Network project implemented by a Business Entity appointed by the Provincial Government. Reported from the Bisnis.com page, the Head of the DKI Jakarta Bina Marga Agency stated that regarding the budget, currently there is no Regional Revenue and Expenditure Budget (APBD) allocated for the ducting project. Thus, the

implementation of the Utility Network construction in Jakarta requires budget sources or capital outside the Regional Government Budget, so the right solution is to use funds from the private sector. The Utility Network is basically a means of infrastructure organized by the Government and built in public spaces for the public interest.

The cooperation scheme for the utilization of land owned by the regional government that will be used for public interests such as utility networks is based on a cooperation agreement between the regional government and the private sector. In the case of land to be utilized belonging to the regional government which is classified as Regional Property (BMD), then the form of utilization is subject to DKI Jakarta Regional Regulation Number 7 of 2019. Article 1 number 28 states that Utilization is the utilization of BMD that is not used for the implementation of the duties and functions of the Regional Apparatus and/or optimization of BMD without changing the ownership status. Furthermore, Article 81 states that the Form of BMD Utilization is:

- a. Rent;
- b. Borrow for Use;
- c. Utilization Cooperation;
- d. Build for Handover or Build for Handover; And
- e. Infrastructure Provision Cooperation.

The utilization scheme is basically only based on a cooperation agreement between the local government as the land owner and the private sector as the party that will utilize the land. In relation to the construction of utility networks in DKI Jakarta, the private sector bases its land utilization on the cooperation agreement alone.

Regarding the implementation of the development of the Utility Network infrastructure, the DKI Jakarta Provincial Government has given a mandate to business entities to carry out the development of the Utility Network project. The form of cooperation referred to in Article 6 paragraph (2) of DKI Regional Regulation Number 106 of 2019 is in practice carried out by PT. Jakarta Propertindo (Perseroda). The mandate given is the authority obtained through attribution or delegation which can be mandated to subordinate agencies or employees if the official who obtains the authority is unable to do it himself. The cooperation system implemented regarding the implementation of the development of the Utility Network in DKI Jakarta in practice is by implementing a building contract agreement in the form of Build Operate Transfer (hereinafter referred to as BOT). BOT is an alternative financing mechanism in the process of procuring infrastructure for public services and has been widely used in various countries, especially in Indonesia. In this form of cooperation, the Business Entity will later carry out the development and operation of the Utility Network infrastructure in DKI

Jakarta and for a specified period of time the infrastructure that has been built will be returned to the DKI Jakarta Provincial Government.

As previously mentioned, public facilities such as sidewalks, roads, and utility networks are located on land directly controlled by the state. In the construction of utility networks in DKI Jakarta, they are generally built under sidewalks or roads, so it can be said that the construction of utility network facilities is located on land directly controlled by the state. The problem that arises in this project is the horizontal separation of use between sidewalks or roads that are above ground and utility networks that are underground. Utility networks built for clean water, electricity, telephone, wastewater and gas infrastructure are carried out by placing them underground in the form of pipes and buried cables, some in the air in the form of overhead cables, and in the sea. So far, the implementation of the installation of these utility networks has not been well coordinated, and dismantling and installation in road space often occurs, which has an impact on traffic disruption and damage to road construction.⁶In principle, third parties can obtain building use rights or usage rights derived from land management rights through a build, operate, and transfer (BOT) agreement. The background to the emergence of BOT was stated by Budi Santoso, namely the limited ability of the government or local government to realize infrastructure development projects due to the very limited funds of the State Budget (APBN) or Regional Budget. The form of BOT cooperation between the Provincial Government and the Business Entity contains provisions that the Business Entity will build and operate the Network Utilities located underground from public facilities in the form of sidewalks or roads. This means that it can be said that there is a horizontal difference in designation between those above the ground and those below the ground. In relation to this, certainty over land rights in the control and use of underground space in the Utility Network development project is an obligation that must be fulfilled by the state because in its development, the use of underground space becomes a project that will continue to grow. Certainty in terms of granting land rights is very important in the implementation of the development of the Utility Network infrastructure in DKI Jakarta Province because of the Law on Spatial Planning in Article 2 letter h. adheres to the principle of legal certainty, so it is also necessary to guarantee legal certainty in terms of the legal basis for land rights in the construction of Utility Networks. However, with the enactment of Government Regulation No. 18 of 2021, parties who manage underground spaces through utilization cooperation with local governments are allowed to have land rights in underground spaces. This can certainly provide a more

⁶Hetty Hasanah, "Consumer Protection in Consumer Financing Agreements for Motor Vehicles with Fiduciary", article accessed on June 1, 2015 from <http://jurnal.unikom.ac.id/vol3/perlindungan.html>.

certain basis for ownership for parties who manage underground spaces. PP No. 18 of 2021 concerning Management Rights, Land Rights, Apartment Units, and Land Registration regulates. Thus, this regulation can basically guarantee ownership of land rights in underground spaces. This view can be found in Article 77 of PP No. 18 of 2021 concerning Management Rights, Land Rights, Apartment Units, and Land Registration which states:

- (1) The aboveground space or basement space can be granted management rights, building use rights, or usage rights after the aboveground space or basement space has been utilized.
- (2) Management rights, building use rights, and use rights for the above-ground or underground space are granted through a decision granting rights by the Minister.
- (3) Building use rights and use rights for the Upper Land Space or Underground Space granted above the Upper Land Space or Underground Space Management Rights are granted by a decision granting rights by the Minister based on the approval of the Management Rights holder.

Then Article 79 of PP No. 18 of 2021 concerning Management Rights, Land Rights, Apartment Units, and Land Registration states that:

- (1) Management rights, building use rights and use rights for underground space are granted to:
 - a. Shallow Basement; or
 - b. Deep Underground Room.
- (2) In the case of the use and utilization of shallow Underground Space as referred to in paragraph (1) letter a disturbing the public interest and/or the interests of the Land Rights holder on the surface of the Land, then the approval of the Land Rights holder is required.
- (3) The approval from the Land Rights holder as referred to in paragraph (2) is made in the form of an authentic deed in accordance with the provisions of statutory regulations.
- (4) Any form of disturbance received by the Land Rights holder will be compensated in the form of money or another form as agreed with the party who will use and utilize the Underground Space.
- (5) The calculation of the compensation value as referred to in paragraph (4) is carried out by a land appraiser.

Even though PP No. 18 of 2021 concerning Management Rights, Land Rights, Apartment Units, and Land Registration has regulated the media for ownership of underground space, in fact PP No. 18 of 2021 concerning Management Rights, Land Rights, Apartment Units, and Land Registration does not regulate equal rights for each group in obtaining benefits from underground space, this is because the only party that can have the right to use underground space in PP No. 18 of 2021 concerning Management Rights, Land Rights, Apartment Units, and

Land Registration is only the private sector that cooperates with the government in utilizing underground space.

4. Conclusion

The current absence of regulation regarding basement ownership has resulted in the neglect of justice for basement users. Especially in the context of social justice for all Indonesian people according to Pancasila. In terms of material-substantiality and intrinsically, Pancasila is philosophical. For example, the essence of the principle of just and civilized humanity, not to mention the values in the principle of Belief in the One Almighty God and the values in the other principles. All of them are metaphysical/philosophical in nature, in the cultural system of pre-independence Indonesian society and still ongoing today and should be in the future, the values of Pancasila are recognized as a philosophy of life or outlook on life that is practiced. The weakness that occurs is that the provisions in DKI Jakarta Governor Regulation Number 167 of 2012 concerning Underground Space do not regulate the underground land ownership system and PP No. 18 of 2021 concerning Management Rights, Land Rights, Apartment Units, and Land Registration does not regulate equal rights for each group in obtaining benefits from underground space, this is because the party that can only have the right to use underground space in PP No. 18 of 2021 concerning Management Rights, Land Rights, Apartment Units, and Land Registration.

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Government Regulation Number 17 of 2018 concerning Districts.

Interview

Eny Sulma as a Young Land Administrator in the Rights Determination and Registration Section of Banyumas Regency at the Banyumas Regency Land Agency Office, January 15, 2024 at 13:00 WIB