

Regulating Vertical Housing: Analysis of Indonesia's Law No. 20/2011 in Kudus Urban Development

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Abstract

The development of flats in Kudus City is a solution to land limitations along with the increasing need for housing. This article analyzes the implementation of Law No. 20 of 2011 concerning Flats in a local context, including national regulations, implementation in the field, and the challenges faced. The results of the analysis show that the implementation of regulations in Kudus is not optimal due to the absence of special regulations, licensing obstacles, lack of legal education, and weak supervision. Strengthening of regional regulations, harmonization of central-regional policies, and increasing the role of government in socialization and supervision are needed in order to realize sustainable vertical housing.

Keywords

Flats, Law No. 20 of 2011, regional regulations, Kudus City.

A. Introduction

Rapid population growth in Indonesia brings significant impacts on the need for decent housing. Faced with limited land, especially in urban areas, the concept of vertical housing such as apartments and flats becomes one of the strategic solutions to address this challenge. Vertical housing not only offers efficient land use but also opens opportunities for developing more structured and sustainable urban areas. In this context, the Indonesian government has specifically regulated flats through Law of the Republic of Indonesia Number 20 of 2011 concerning Flats.¹

This law aims to provide legal certainty regarding the construction, ownership, and management of flats. This regulation is intended so that vertical housing can be developed in an orderly, safe, and socially just manner. It regulates various aspects, from the rights and obligations of apartment unit owners, shared management, to the division of functions between the main building and shared facilities. With clear regulations, it is hoped that flat development can provide maximum benefits for both the community and developers, without neglecting social, legal, and spatial planning aspects.²

Kudus City, as one of the developing areas in Central Java, is now beginning to show quite significant development dynamics. Kudus is not only known as an industrial city and microeconomic center but also as a city with a fairly fast population growth rate. With the increasing housing needs occurring alongside the rate of urbanization and community mobility, Kudus City is starting to face the challenge of limited horizontal residential land. In situations like this, flats become a potentially developed alternative housing option.

¹ Ihwan, Miftakhul, et al. "Pemenuhan Hak Atas Rumah Layak Huni Bagi Masyarakat Miskin." *Jurnal Pengabdian Hukum Indonesia* 5, no. 1 (2022): 89-101; Effendi, Alwaahab Agirda Nugraha, and Akhmad Darajati Setiawan. "Legal Certainty on Land Ownership Rights Above Management Rights." *Ikatan Penulis Mahasiswa Hukum Indonesia Law Journal* 3, no. 2 (2023): 194-205.

² See also Ristiana, Heni, Ery Agus Priyono, and Suradi Suradi. "TINJAUAN HUKUM TERHADAP OPER KREDIT KEPEMILIKAN RUMAH KPR MELALUI PERJANJIAN JUAL BELI DI BAWAH TANGAN (Studi Kasus Putusan Nomor 27/Pdt. G/2017/PN Unr)." *Diponegoro Law Journal* 8, no. 3 (2019): 2041-2057.

The implementation of flat development in areas such as Kudus still faces various constraints, both technical, social, and legal. One of the main challenges is how effectively regulations made at the national level—such as Law No. 20 of 2011—can be applied at the local level. The suboptimal understanding of the content and purpose of this regulation, as well as the minimal derivative regulations at the local level, can cause inconsistencies between policy and field implementation. This risk causing legal conflicts, uncertainty in the ownership status of apartment units, and neglect of residents' and owners' rights.³

It is important to conduct an in-depth analysis of the implementation of flat regulations based on Law No. 20 of 2011 in the context of development in Kudus City. This study will not only reveal the extent to which the regulation has been implemented but also provide a comprehensive overview of the obstacles faced and the solutions that can be taken to improve the effectiveness of the regulation in supporting sustainable vertical housing development in the region. This analysis is also relevant as input for drafting regional policies so that flat development can run in harmony with community needs and applicable legal principles.

This study has two main problems, *first*, how is the implementation of Law No. 20 of 2011 concerning Flats in Kudus City?, and *second* What are the legal and administrative constraints in the development of flats in Kudus?

In compiling this study, the author uses a qualitative research method by applying a normative legal research approach, also known as legal research. This approach is used to examine applicable positive legal norms and analyze various relevant legal documents in order to answer the problems raised in the article. This research is specifically conducted through library research (library research), by collecting legal data or materials from both primary and secondary sources. These sources include legal literature or law books, scientific journals, academic articles, jurisprudence, legislation, and other official documents related to the issues discussed. Through a review of these various sources, the

³ Prasojo, Wira. "Analisis tingkat kepuasan penghuni pada hunian rumah susun ditinjau terhadap kualitas bangunan di wilayah Surabaya." *Rekayasa Teknik Sipil* 3, no. 3 (2014): 54-62.

author attempts to build a systematic and critical argumentation in order to obtain an in-depth understanding of the normative aspects of the legal issues studied. Furthermore, this method also allows the author to identify legal gaps, regulatory inconsistencies, and opportunities for legal renewal that can be proposed as solutions to the problems raised in this article.

B. The Implementation of Law No. 20 of 2011 concerning Flats in Kudus City

From the perspective of Indonesian law, flats and apartments are forms of vertical housing specifically regulated in legislation. According to Article 1 point 1 of Law No. 20 of 2011 concerning Flats, a flat is a building constructed within an environment divided into parts stratified functionally in vertical and horizontal directions and is units that can each be owned and used separately, mainly for housing, complete with common parts, common objects, and common land.

The term apartment is generally used in practice to refer to commercial flats, especially those with higher selling prices and facilities, and intended for the middle to upper class. However, legally, there is no explicit distinction between flats and apartments in Law No. 20 of 2011; both fall into the category of flats and are subject to the same legal provisions. Therefore, simple flats (public housing/ state-owned flats), general flats, and private apartments are all subject to the legal framework regulating aspects of construction, ownership, and management.⁴

Law No. 20 of 2011 emerged as a response to the increasing need for housing in urban areas and the limited available land. This regulation is based on the principles of land efficiency, legal certainty, social justice, and fulfillment of the right to adequate housing. The main objective of this law is to create a legal system that can regulate the

⁴ Sihombing, Sahat M., Aartje Tehupeiory, and Dhaniswara K. Harjono. "Analisis Sinkronisasi UU Nomor 20 Tahun 2011 Tentang Rusun dengan Peraturan Tentang Pembangunan Rusun Dikaitkan Dengan Kepastian Perlindungan Hukum Konsumen (Studi pada Rumah Susun DKI Jakarta)." *Jurnal Hukum To-Ra* 7, no. 1 (2021): 223-234.

construction and ownership of flats in an orderly, safe, and fair manner, for both low-income communities and the middle to upper class.

This law also aims to ensure that each apartment unit has legal protection for ownership rights, shared management, and responsibility for common parts, common objects, and common land. Apartment unit owners have rights to:

1. Full ownership of the housing unit (apartment unit).
 2. Rights to common parts (e.g., corridors, stairs, lobby).
 3. Rights to common objects (such as elevators, water pumps, electrical installations).
 4. Rights to the common land underlying the apartment building.
- Besides rights, owners also have obligations to:
1. Pay contributions for environmental management and maintenance of shared facilities.
 2. Comply with management rules established by the Association of Apartment Unit Owners and Residents (PPPSRS).
 3. Maintain order and not disturb other residents.
 4. Management and Ownership Status of Apartment Units

Apartment units can be owned individually in the form of a Certificate of Ownership Rights for Apartment Units (SHMSRS). This certificate is attached to a specific unit and is based on the ownership of common land. Therefore, before an apartment unit can be sold or transferred, it must be ensured that the land status and building permit (now PBG - Building Permit) comply with legal provisions.

Law No. 20 of 2011 also mandates the formation of PPPSRS, which is a legal entity for apartment unit owners and residents to manage shared facilities independently and collectively. PPPSRS is responsible for day-to-day management and formulating the code of conduct for life in the apartment environment.

As the implementing regulation for the Omnibus Law (UU Cipta Kerja) which also revises parts of Law No. 20 of 2011, Government Regulation (PP) No. 13 of 2021 concerning the Management of Flats provides further details regarding the procedures for construction, utilization, and management of flats. This PP regulates:

1. Technical requirements for flat construction.
2. Procedures for determining the status of SHMSRS.

3. Mechanisms for forming and the functions of PPPSRS.
4. Responsibilities of developers and local governments.

This PP strengthens the integration between flat permits and the risk-based business licensing system (OSS). Several Minister of Public Works and Housing Regulations (PUPR) also support the implementation of Law No. 20 of 2011, including:

1. PUPR Ministerial Regulation No. 14/PRT/M/2017 concerning Technical Requirements for Flats.
2. PUPR Ministerial Regulation No. 23/PRT/M/2018 concerning PPPSRS.

These regulations govern technical aspects such as building safety, room utilization procedures, and guidelines for forming the PPPSRS organization.

To date, no specific Regional Regulation (Perda) has been found in Kudus City that explicitly regulates flats. The absence of this regulation can become one of the obstacles in the effective application of Law No. 20 of 2011 at the local level. In this context, it is important for the Kudus Regency Government to draft derivative regulations that support the technical arrangement, licensing, and management of flats in a more contextual manner with local conditions.

Kudus City, located in Central Java Province, is an area with rapid economic growth, supported by industry, trade, and education sectors. This growth directly impacts the increase in population and the need for decent housing. According to 2013 monograph data, with an area of 42,516 hectares and a population of 342,754 people, the population density in Kudus City reaches 12,849 people per km². This figure indicates high pressure on residential land, especially in urban areas.

Rapid population growth causes a significant increase in housing demand. However, limited land and high land prices become the main obstacles in providing horizontal housing. Therefore, the development of flats becomes an efficient alternative solution to overcome land limitations and meet the housing needs of the community, especially low-income communities (MBR).

The Kudus Regency Government has initiated the construction of several flat projects to address housing needs. One of the realized

projects is the Simple Rental Flats (Rusunawa) in Bakalan Krapyak Village, Kaliwungu District. This Rusunawa consists of four twin blocks, three of which have been inhabited by around 190 people, while one twin block is still empty.⁵

In addition, there are also flats intended for certain groups, such as the Mahad Qudsiyyah Kudus Islamic Boarding School Flats located on Jl. KHR Asnawi, Gg. Kerjasan, Kudus City. These projects indicate the government's efforts in providing vertical housing for various community segments.

The development of flats in Kudus City must comply with applicable laws and regulations, including provisions regarding building permits and land use. Based on Kudus Regency Regional Regulation Number 16 of 2012 concerning the Spatial Plan (RTRW) for 2012-2032, the direction for regional space utilization has been established, including land allocation for settlements.

However, in practice, there are still challenges regarding permits and land use. Several flat projects face obstacles related to the suitability of the location with the applicable RTRW, thus requiring a revision or adjustment process of the regulation to be realized. This shows the need for better coordination between the local government and developers in planning and implementing flat projects.

Law No. 20 of 2011 concerning Flats becomes the main legal basis in the construction and management of flats in Indonesia. The Kudus Regency Government has adopted the provisions of this law through various policies and programs, such as the construction of Rusunawa for LBRs. However, the implementation of this regulation at the local level still faces various challenges, including in terms of socialization to the community and supervision of flat management.

The suitability of flat development with the RTRW is a crucial aspect in spatial planning. Regional Regulation No. 16 of 2012 concerning the RTRW of Kudus Regency for 2012-2032 establishes the direction of regional space utilization, including settlement areas. However, in practice, there are cases where the location planned for flat

⁵ Lumingkewas, Cindy Sandra. "Analisis Yuridis Pemaknaan Konsep Dalam Pasal 16 Undang-Undang Rumah Susun Bagi Masyarakat Berpenghasilan Rendah." *Arena Hukum* 9, no. 3 (2016): 421-441.

construction is outside the designated settlement area, thus requiring an RTRW revision or special dispensation to be realized.

The role of private developers in the construction of flats in Kudus City is still limited. This is caused by various factors, including the complexity of licensing, regulatory uncertainty, and investment risks. In addition, administrative challenges such as lengthy licensing processes and lack of coordination between agencies also become obstacles in involving the private sector.⁶

To overcome this challenge, efforts are needed from the local government to simplify the licensing process, provide incentives for developers, and improve coordination between related agencies. Thus, it is hoped that the participation of private developers in the construction of flats in Kudus City can increase, so that the housing needs of the community can be met more effectively.

Law No. 20 of 2011 concerning Flats provides a comprehensive legal framework for regulating the construction, ownership, and management of flats. However, in practice at the local level, especially in Kudus City, the implementation of this regulation is not entirely in line with the norms and principles set forth in the law. This inconsistency is often caused by the suboptimal adoption of national policies into regional regulations (Perda), lack of institutional capacity, and limited understanding of the substance of the regulation by officials and the community.

For example, Kudus does not yet have a specific Perda that technically regulates the construction and management of flats. As a result, the implementation of principles such as the formation of the Association of Apartment Unit Owners and Residents (PPPSRS), management of shared facilities, and mechanisms for utilizing common land has not run optimally. Meanwhile, the existence of local legal instruments is very important so that supervision and implementation

⁶ Paramadani, Salsabila Putri, Betty Rubiati, and Agus Suwandono. "Perlindungan Hukum Bagi Pembeli Rumah Susun Bukan Hunian (Non-Hunian) Ditinjau Berdasarkan Undang-Undang Nomor 8 Tahun 1999 tentang Perlindungan Konsumen dan Undang-Undang Nomor 20 Tahun 2011 tentang Rumah Susun." *ACTA DIURNAL Jurnal Ilmu Hukum Kenotariatan* 4, no. 1 (2020): 18-35.

in the field can be carried out more effectively and in accordance with local contexts.

One of the major challenges in the development of flats in areas such as Kudus City is the complexity of the licensing process. Although bureaucratic reform has been carried out through the Online Single Submission (OSS) system, at the local level there are often overlapping authorities and slow approval processes. Developers must go through various licensing stages, from location permits, spatial suitability, Building Permits (PBG), to the approval of environmental documents, requiring cross-departmental coordination.

In addition, the lack of socialization regarding flat law provisions becomes a constraint. Many residents and prospective residents do not understand their rights and obligations as owners/residents of apartment units. They also lack awareness of the importance of the existence of PPPSRS as a shared management body. Consequently, internal conflicts often occur in apartments, such as disputes over the use of public facilities, cost-sharing for management, and unresolved ownership issues.⁷

From the perspective of law enforcement, weak supervision over regulatory violations causes practices in the field to often not comply with applicable provisions. For example, there are flats built without meeting technical requirements or utilizing land not in accordance with the Spatial Plan (RTRW), but are still allowed to operate due to weak actions from the competent authorities.

Ownership and certification issues of apartment units also become problems that frequently arise in the implementation of regulations in the regions. Based on Law No. 20 of 2011, ownership of apartment units must be proven by a Certificate of Ownership Rights for Apartment Units (SHMSRS), which is based on the right to common land.

However, in many cases in Kudus City, developers and the government have not completed the process of splitting the master certificate into SHMSRS. This causes unit owners to lack legal certainty regarding their housing. Some residents only have payment receipts or

⁷ Palenewen, James Yoseph. *Hak dan kepemilikan rumah susun perspektif Undang-Undang Nomor 20 Tahun 2011*. Penerbit Widina, 2023.

sales agreements, but have not yet obtained official certificates from the National Land Agency (BPN).

This unclear ownership status not only disadvantages the owners but also has broader legal impacts, such as difficulties in pledging apartment units for bank credit or legally transferring ownership rights. This problem emphasizes the need to improve coordination between developers, local governments, and the BPN to accelerate the legalization process for apartment unit ownership.

The development of flats in Kudus City brings complex social and economic impacts on the local community. On one hand, flats can become housing solutions for low-income communities (MBR), especially in densely populated areas where horizontal housing is difficult to build. With more affordable rental or purchase prices, communities who previously lived in slums can have access to better and more orderly housing.⁸

On the other hand, not all flat projects consider the social conditions of their recipients. For example, placing residents with very heterogeneous social backgrounds in one rusun block without a community empowerment program can cause social friction. Lack of public facilities, open spaces, and basic services can also exacerbate social inequality in the rusun environment.

Economically, flats can open up micro-business opportunities in the surrounding environment, such as shops, laundries, and so on. However, if not accompanied by integrated area planning, rusun development can actually create new pockets of poverty, especially if residents do not have access to public transportation, jobs, or education and health services.

Therefore, flat development must be integrated into holistic and participatory city planning, involving residents in the planning, implementation, and evaluation processes of vertical housing policies.

⁸ Yodiniya, Sausan, Yani Pujiwati, and Betty Rubiati. "Hak Milik Atas Satuan Rumah Susun Untuk Pertokoan Dengan Status Hak Guna Bangunan Di Atas Hak Pengelolaan Dikaitkan Dengan Undang-Undang Nomor 20 Tahun 2011 Tentang Rumah Susun." *ACTA DIURNAL Jurnal Ilmu Hukum Kenotariatan* 3, no. 2 (2020): 241-256.

C. Solutions and Recommendations

Law No. 20 of 2011 concerning Flats becomes the main legal framework in the management of flats in Indonesia. However, for its implementation to run effectively at the local level, strengthening regional regulations is needed in the form of regional regulations (Perda) and their technical derivative policies. In Kudus City, to date, there is no Perda that specifically regulates the management of flats, whether in terms of construction, ownership, management, or occupancy aspects.

Strengthening regional regulations is necessary to address local needs and clarify the implementation of the regency government's authority in supporting flat development. Perda can regulate matters such as criteria for flats for low-income communities (MBR), location designation mechanisms, incentives for developers, as well as technical arrangements for managing shared facilities and forming the Association of Apartment Unit Owners and Residents (PPPSRS). This regulation can also become a clear legal basis in resolving disputes or violations related to flats. With the presence of a strong and implementable Perda, the Kudus Local Government will have a more effective legal instrument in regulating, supervising, and developing the flat sector sustainably.

Flat development requires strong synergy between central and local government policies. Policy harmonization becomes important so that planning and implementation of flat construction do not overlap or contradict each other. The central government through the Ministry of Public Works and Housing and other ministries/agencies has established technical regulations and general policies, such as in Government Regulation (PP) No. 13 of 2021 and various PUPR Ministerial Regulations regulating technical construction and flat qualifications.

However, challenges arise when central policies are not aligned with local conditions. For example, national criteria for rusun locations might not be suitable with the local spatial plan (RTRW), or the central incentive mechanism cannot be applied due to differences in regional fiscal capacity. In the context of Kudus City, this harmonization must be realized through aligning the RTRW with national strategic plans, as well as forming coordination forums between the local government and technical ministries to discuss rusun development schemes suitable for

the needs of the Kudus community. The local government must also actively convey field data and conditions to the central government so that the resulting policies are responsive to local realities.

The local government plays a strategic role in providing legal education on flats to the community and developers. This education is very important because the complexity of flat law is often not fully understood by prospective residents or developers.

For the community, legal education aims to help them understand their rights and obligations as owners or residents of apartment units, including the obligation to form PPPSRS, pay shared management contributions, and maintain environmental order. For developers, education is directed towards compliance with licensing procedures, building technical specifications, processing apartment unit certificates (SHMSRS), and transferring management to PPPSRS after the housing is ready for occupancy.⁹

Legal education can be carried out through regulation socialization, community counseling, distribution of guidebooks, and even providing free legal consultation services at relevant department offices. The local government can also cooperate with universities and NGOs to reach less educated community groups.

Transparent, efficient, and integrated licensing processes are key to successfully supporting flat development. The local government needs to strengthen the licensing system so it does not become a barrier for developers, but still maintains compliance with legal and spatial norms. Integration of the licensing system through platforms such as Online Single Submission (OSS) must be accompanied by increasing the capacity of human resources in technical departments and simplifying the licensing process stages.

On the other hand, supervision over the implementation of flat projects also needs to be improved. Supervision includes technical aspects of buildings, suitability with permits, land use, and the fulfillment of developers' post-construction obligations, such as processing SHMSRS and forming PPPSRS. The local government needs to have an integrated supervision team involving licensing

⁹ Prasjo, "Analisis tingkat kepuasan penghuni pada hunian rumah susun ditinjau terhadap kualitas bangunan di wilayah Surabaya."

departments, housing departments, spatial planning departments, and Satpol PP as rule enforcers.

With a strong licensing and supervision system, violations of regulations can be minimized and public trust in flats can increase. This will also create a healthy investment climate for developers in the vertical housing sector.

D. Conclusion

Based on the analysis results of flat regulations as regulated in Law No. 20 of 2011 and its implementation in the context of flat development in Kudus City, several important points can be concluded as follows: *First*, flats or apartments are forms of vertical housing that have been quite comprehensively regulated legally through Law No. 20 of 2011 along with its implementing regulations, such as PP No. 13 of 2021 and various PUPR Ministerial Regulations. This regulation covers aspects of ownership, management, rights and obligations of residents, as well as the roles of developers and the government in managing flats. *Second*, Kudus City, as a developing area with a relatively high population growth rate, faces land limitation challenges, making flats a rational and potentially developed alternative housing option. Several flat projects have started to be built, both by the central government for low-income communities (MBR) and by the private sector. However, the effectiveness of implementing Law No. 20 of 2011 in Kudus City still faces various obstacles. The absence of specific regional regulations on flats causes a legal vacuum in the technical implementation in the field. Other obstacles include licensing complexity, lack of legal socialization to the community and developers, and weak supervision over ongoing flat projects. *Third*, ownership and certification issues of flat units also become a major concern. Many residents do not yet have a Certificate of Ownership Rights for Apartment Units (SHMSRS), which should be the official proof of ownership and legal guarantee for their residence. Furthermore, social and economic aspects, such as facility inequality, conflicts between residents, and integration with the surrounding environment, also require attention in the development of vertical housing in Kudus. Therefore, strategic steps involving collaboration between the central government, local government,

developers, and academics are needed to optimize the implementation of flat regulations fairly and sustainably.

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