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Effectiveness of Controlling Agricultural Land Conversion in the Puncak Tourism Area of Cisarua Subdistrict by the Bogor Regency National Land Agency from a Spatial Planning Law Perspective

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Abstract

The development of tourism in the Puncak area of Cisarua District has led to an increase in the conversion of agricultural land into residential areas and villas, which has the potential to conflict with the Regional Spatial Plan (RTRW). This study aims to analyze the effectiveness of controlling the conversion of agricultural land in the Puncak area from a spatial planning law perspective and to identify the factors causing land use inconsistencies. The method used is juridical-empirical with the support of spatial analysis through the technique of analyzing land use maps for 2020 and 2025 based on Google Earth imagery compared with the Bogor Regency RTRW (Local Regulation Number 1 of 2024). The results of the study show that there has been significant land

conversion in agricultural and buffer areas, with a total area of non-compliance reaching 7,803 hectares. This reflects weak preventive supervision, limited post-grant control, and suboptimal integration of land and spatial planning data. This study recommends strengthening institutional coordination, integrating data systems, and tightening spatial planning compliance verification to support sustainable land management.

Keywords

land conversion, spatial planning, land use control, National Land Agency

A. Introduction

Land is the primary resource for various productive activities such as agriculture, animal husbandry, and infrastructure development. Fertile and strategically located land enables humans to produce food, build houses, and develop businesses that support the economy. In everyday terms, soil is not a three-dimensional body but includes mass that is lifted as fill material, or used in plants for planting and other purposes. To explain that soil is an individual in soil taxonomy, it is known as soil and soil material. Soil material is a material or mass that makes up the soil body, the form of which is not determined by the composition of horizons or layers and depth. For humans, soil is a natural resource that has great significance.

On land, humans can earn a living by farming, gardening, and raising livestock. Land also contains a variety of natural resources that are utilized by humans. Land and its ownership patterns for the community in general, especially rural communities, are important factors for social and economic development. Article 33 paragraph (3) of the 1945 Constitution is the basis for the legal relationship between land and land subjects, whereby the state acts as the subject with the highest authority over all interests in land for the

prosperity of all people. Furthermore, Article 2 paragraph (1) of the Basic Agrarian Law (UUPA) No. 5 of 1960 states that: "Based on the provisions of Article 33 paragraph (1) of the - Constitution of 1945 in matters as referred to in Article 1, the earth, water, and airspace, including the natural resources contained therein, are controlled at the highest level by the State, as the organization of the power of the entire people. The existence of land issues in human life is very important because the scope of human life depends on land. The existence of the earth cannot be separated from all human actions, because the earth is the place where humans can live and continue their lives. Some even say, somewhat extremely, that humans cannot live without the earth, even though other elements also influence human life on earth, such as air, flora, fauna, and other objects. The increasing demand for land for various activities has encouraged more effective and efficient land use in both agricultural and non-agricultural sectors.

This phenomenon can certainly cause serious problems with the reduction in food supply capacity. Along with the rapid increase in population and economic development, the need for land for non-agricultural activities continues to increase. This makes it difficult to avoid the conversion of agricultural land, so that in the near future, the land surrounding agricultural areas will also be progressively converted. On the other hand, efficient land use also encourages competition and even conflicts of interest in land use and utilization. The urgent need for urban development strategies, which has led to the conversion of agricultural land to non-agricultural use, is caused by several factors, including external factors (the dynamics of urban, demographic, and economic growth), internal factors (the socio-economic conditions of agricultural households using the land), and policy factors (regulatory aspects issued by the central and regional governments related to changes in land use).¹

¹ Francisco Abellán and Carmen Martínez, "Landscape and Tourism as Tools for Local Development in Mid-Mountain Rural Areas in the Southeast of Spain (Castilla-La Mancha)," *Land* 10 (February 22, 2021): 221, <https://doi.org/10.3390/land10020221>.

Land conversion is a change in the use of land from its original function to another function. In practice, this change is often influenced by various factors, ranging from population growth, urbanization, economic development, to government policies. On the one hand, land use change can drive economic growth in a region, create new jobs, and open up business opportunities. However, on the other hand, the impacts cannot be ignored. The loss of productive agricultural land, environmental damage, and disruption of ecosystems are real consequences that must be taken into account. Legally (*das sollen*), all land use must be guided by the established spatial plan.

"Forests and water catchment areas, which should be natural defenses against flooding, have been turned into villas, hotels, housing, and tourism developments under the guise of being environmentally friendly," he continued. Iwang said, "The conversion of these lands is taking place in plantation areas under the management of PT Perkebunan Nusantara VIII. Over the past five years, Walhi estimates that nearly 45% of the damage in the Puncak Bogor area has increased dramatically," said Wahyudin Iwang, Executive Director of Wahana Lingkungan Hidup Indonesia (Walhi) West Java, on Friday (March 7, 2025).²

This is regulated in Presidential Regulation No. 60 of 2020 Article 126 concerning Spatial Planning, which stipulates that spatial utilization must be in accordance with the zoning permits specified in the Spatial Plan (RTRW). At the regional level, this regulation is translated through Bogor Regency Regulation No. 1 of 2024, which regulates regional zoning, including protected areas and areas designated for sustainable food agriculture. Article 74 of the regulation stipulates the objectives and directions for the development of the Puncak tourism area, including the control of tourism and accommodation activities in accordance with land carrying capacity, land and environmental restoration in disaster-prone areas, and control of development in protected and water catchment areas. Meanwhile, Article 87

²Detik.com/jabar/berita/d-7811701/walhi-sebut-alih-fungsi-lahan-di-puncak-bogor-sudah-bertahun-tahun-terjadi

stipulates that land use must comply with the Spatial Plan (RTRW), through zoning instruments, incentives/disincentives, performance assessments, and sanctions. This provision is reinforced by Law No. 41 of 2009 concerning the Protection of Sustainable Food Agricultural Land, which essentially prohibits the conversion of sustainable food agricultural land, except for specific purposes and on the condition that there is equivalent land replacement and through official procedures. However, the reality on the ground (*das sein*) shows something different. The Puncak region in Bogor plays an important role as a water catchment area that is vital for the Jakarta, Bogor, Depok, Tangerang, and Bekasi (Jabodetabek) areas. However, in the implementation of legal protection in the field, there are various obstacles. Hilly areas, riverbanks, flood-prone areas, and urban agricultural land that should remain green are now being converted into residential and business areas. This phenomenon highlights the discrepancy between established legal regulations and their implementation in society.³

At the regional level, Regional Regulation No. 1/2024 “allows” the use of plantation land in cultivation areas. This regulation aims to balance economic development needs with the protection of the natural environmental functions of the area. Despite legal prohibitions, the conversion of land from plantations and forests into residential areas, villas, and commercial facilities continues to occur, even though these areas should be preserved as agricultural land or protected areas. This condition has the potential to violate the provisions of Articles 74, 87, 115, and 141 of the Bogor Regency Spatial Plan Regional Regulation, as well as the provisions of the Spatial Planning Law and the Sustainable Food Agricultural Land Protection Law.

The cause of this land conversion is inseparable from the strategic position of Bogor Regency as a buffer zone for the

³ Nyoman Diah Utari Dewi et al., “Regulating Land-Use Conversion for Sustainable Tourism: A Case Study of Lodtunduh Village, Ubud,” *IAPA Proceedings Conference; 2024: AAPA-EROPA-AGPA-IAPA International Conference 2024 Towards World Class Bureaucracy*, 2024, <https://doi.org/10.30589/proceedings.2024.1159>.

capital city and a popular tourist destination. High demand from the tourism market, rapid population growth, and urbanization have driven an increase in the need for non-agricultural land. Data from the Bogor Regency Central Statistics Agency shows that in 2022, the tourism sector contributed around 20% to the region's Gross Regional Domestic Product (GRDP). Although this contribution is significant, its negative impact on environmental sustainability and food security also needs serious attention.

This situation raises an important question: to what extent are the policies and supervision carried out by the National Land Agency (BPN) and the Bogor Regency Government capable of controlling land conversion so that it remains in accordance with applicable spatial planning regulations? How effective is the implementation of the Spatial Plan (RTRW) amid economic pressures and development needs? These questions form the basis of this study, with the hope of providing a comprehensive picture of the effectiveness of agricultural land conversion management in the Puncak region and its legal, social, and economic implications.⁴

Studies on agricultural land conversion have been conducted extensively, but with varying focuses. Angga Maulana (2023) and Vivi Fatimah (2023) examined land conversion from a socio-economic and Islamic law perspective, with an emphasis on the impact on society. Meanwhile, Wahyu Setiawan (2020) analyzed land conversion within the framework of sustainable development, and Endang Diah Ayu Pitaloka (2021) focused on the normative aspects of legal protection for agricultural land. Faridl et al. (2025) have examined the enforcement of administrative sanctions for land use change violations in the Puncak Bogor area, but their focus is limited to the repressive aspects of environmental law.⁵

⁴ M Rawa El Amady et al., "Local Actions Prevent Land Conversion through Tourism in Rokan Koto Ruang Village, Rokan Hulu, Riau, Indonesia," *E3S Web Conf.* 593 (2024), <https://doi.org/10.1051/e3sconf/202459307003>.

⁵ Mostafa Ghadami et al., "Factors Affecting the Change of

Although these studies discuss land conversion from the perspectives of social impact, sustainability, legal protection, and enforcement of sanctions, there has been no specific and comprehensive study analyzing the effectiveness of the role of the National Land Agency (BPN) as a key actor in the preventive stage of control through land administration mechanisms and spatial planning compliance. This study uses a legal-empirical method with a descriptive-analytical approach. The juridical approach is used to analyze the legal norms governing land use change control, particularly Presidential Regulation No. 60 of 2020, Law No. 41 of 2009 concerning Sustainable Food Agricultural Land Protection, and Bogor Regency Regulation No. 1 of 2024 concerning Spatial Planning. Meanwhile, the empirical approach is used to assess the implementation of these norms in the practice of land services in the field.

Primary data was obtained through interviews with officials from the National Land Agency (BPN) of Bogor Regency and analysis of the factual conditions of land use in Cisarua District. Secondary data consisted of laws and regulations, scientific literature, spatial planning documents, and spatial data related to area zoning. Spatial analysis was carried out using map analysis techniques between the 2020 and 2025 land use maps based on Google Earth imagery and the Bogor Regency Spatial Plan map. This technique was used to identify patterns of land use change and the degree of conformity with the designated spatial allocation. All data were analyzed qualitatively by integrating normative findings (*das sollen*) and empirical conditions (*das sein*) to assess the effectiveness of the BPN's role in controlling the conversion of agricultural land in the Puncak tourism area.

Agricultural Land Use to Tourism: A Case Study on the Southern Coasts of the Caspian Sea, Iran," *Agriculture* 12 (January 10, 2022): 90, <https://doi.org/10.3390/agriculture12010090>.

B. Bogor Regency National Land Agency in Managing the Conversion of Agricultural Land in the Puncak Tourism Area in Accordance with the Provisions of the Law

This study uses the theory of law enforcement proposed by Soerjono Soekanto as an analytical tool to measure the effectiveness of land use control in Cisarua District. According to Soerjono Soekanto, law enforcement is the activity of harmonizing the values embodied in established rules/views that are manifested in attitudes and actions as a series of final stages of value expression, in order to create, maintain, and preserve peaceful coexistence.⁶ Soerjono Soekanto, in his book entitled "Factors Affecting Law Enforcement," states that the effectiveness of law enforcement is not solely determined by written law, but is influenced by five fundamental factors. These five factors are interrelated and determine the success of law enforcement in society.⁷

First, the legal factors themselves, namely laws in the material sense, written regulations that are generally applicable and made by legitimate central and regional authorities. In the context of this study, legal factors include Law No. 5 of 1960 concerning Basic Agrarian Principles (UUPA), Law No. 26 of 2007 concerning Spatial Planning, Law No. 41 of 2009 concerning Protection of Sustainable Food Agricultural Land (LP2B), and Bogor Regency Regional Regulation concerning Regional Spatial Planning (RTRW).⁸

⁶ Soerjono Soekanto, "Faktor-Faktor Yang Mempengaruhi Penegakan Hukum," 2011, 59.

⁷ Kyoumars Habibi et al., "Ecological Footprint Analysis of Tourism Management in Rural Areas," *Journal of Environmental Planning and Management* 67 (January 12, 2023): 1–13, <https://doi.org/10.1080/09640568.2022.2156852>.

⁸ Soekanto, "Faktor-Faktor Yang Mempengaruhi Penegakan Hukum."

Second, law enforcement factors, namely the parties that formulate and enforce the law. This factor includes the Bogor Regency National Land Agency (BPN), the Civil Service Police Unit (Satpol PP), the Public Works and Spatial Planning Agency, and other relevant agencies that have authority over land use conversion. Third, the means or facilities factor, which includes educated and skilled personnel, good organization, adequate equipment, and sufficient finances. In the context of controlling land use change, this factor includes the availability of field supervisors, mapping technology such as Geographic Information Systems (GIS), satellite imagery for monitoring, and operational budgets for supervision and enforcement. Fourth, the community factor, which is the environment in which the law applies or is enforced. Law enforcement originates from the community and aims to achieve peace within the community.⁹

Controlling agricultural land conversion cannot be separated from the community's role in drafting and supervising spatial plans. Meaningful public participation will create effective social control over the use of space that deviates from applicable regulations. This factor concerns the legal awareness of the Cisarua subdistrict community, the level of compliance of landowners and developers with spatial planning regulations, and community participation in monitoring changes in land use in their environment. Fifth, the cultural factor, which is the work, creation, and taste based on human will in social interaction. This factor includes the values, attitudes, and behavior of the community towards the law. In the context of this study, the cultural factor relates to the views of the Puncak community regarding land, whether it is positioned more as an economic asset that can be converted at any time or as a heritage that must be preserved

⁹ Soekanto.

for future generations.¹⁰

These five factors form the main analytical framework in this study to measure the effectiveness of land use conversion control carried out by the Bogor District BPN in Cisarua Subdistrict. As emphasized by Soerjono Soekanto, the starting point of the five factors of law enforcement is that law enforcement is essentially a process of realizing the ideals of the law.¹¹ Control of agricultural land conversion cannot be separated from the role of the community in the preparation and supervision of spatial plans. Meaningful public participation will create effective social control over the use of space that deviates from applicable regulations.¹²

Table 1. Field Findings on Land Use Change Permits and Land Conversion in Cisarua Subdistrict, Bogor Regency 2020–2025

Research Focus	Research Results
Number of Land Use Change Permits Submitted to the Bogor District National Land Agency for the Cisarua Subdistrict Area	Based on interviews with officials in the Land Rights and Registration Section, in the last five years (2020-2025) there have been no official applications (complete files) for permits to convert agricultural land to non-agricultural use (either by individuals or legal entities).
Number of Permits Rejected	The Head of the Bogor Regency ATR/BPN Office confirmed the policy

¹⁰ Soekanto.

¹¹ Soekanto.

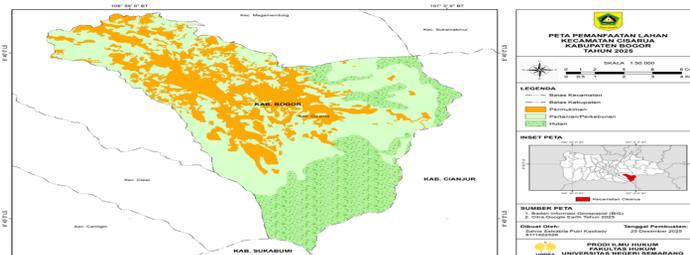
¹² Ali Hyasat, "Awareness and Perception Toward Heritage, Life, and Tourism in Converting Tourism Area," *Journal of Environmental Management and Tourism* 14 (December 29, 2023): 3006, [https://doi.org/10.14505/jemt.v14.8\(72\).03](https://doi.org/10.14505/jemt.v14.8(72).03).

(Recommendations Not Issued)	of rejecting recommendations for Sustainable Food Crop Land (LP2B) areas. Since no official requests had been submitted, administratively there were no formal rejections. The rejection was preventive and a general policy.
Area of Land Suspected of Having Changed Function (Supporting Data from the Field)	Data from environmental activists and field observations indicate massive land conversion. For example, in Tugu Selatan Village, of a total of approximately 750 hectares (former plantation concessions), an estimated 350 hectares have been converted into villas, hotels, and restaurants. This data is not officially recorded by the National Land Agency (BPN) because many conversions did not go through the proper procedures.
Causes of Ineffective Management (Interview Results)	Several contributing factors were identified: 1. Limited authority: BPN only provides recommendations; location permits/building permits are issued by the DPMPTSP Office. 2. Weak physical supervision: Insufficient number of field supervisors. 3. Weak inter-agency coordination: BPN land data is not synchronized with the building permit data of the relevant agencies.

Source : Researcher Analysis, 2026

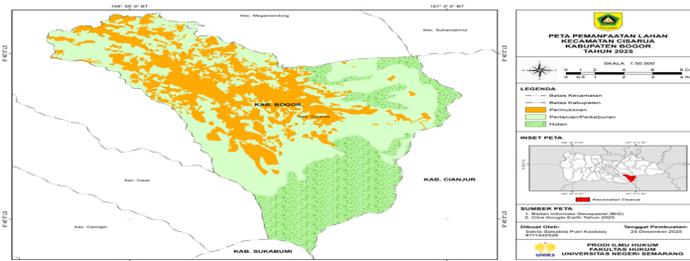
The utilization of land in 2020 and 2025 through Google Earth imagery shows changes in land use. There is a pattern of agricultural land conversion that consistently occurs in zones that are designated as agricultural and buffer areas in the Bogor Regency Spatial Plan (RTRW) Number 1 of 2024.

Figure 1. Cisarua Land Use Map 2020



Source: Researcher Analysis with Google Earth, 2026

Figure 2. Cisarua Land Use Map 2025



Source: Researcher Analysis with Google Earth, 2026

The identification of land use change points was carried out using the technique of analyzing land use maps of Cisarua District in 2020 and 2025, sourced from Google Earth imagery and data from the Geospatial Information Agency (BIG). The analysis was used to detect changes in land use classes from agriculture/plantations to settlements and non-agricultural buildings, which were then compared with the Bogor Regency Spatial Plan (RTRW) zoning to assess the level of spatial use suitability. Google Earth was used to obtain the most recent field data. This was done because the National Land Agency (BPN) compiles land use data every ten years. Given the rapid changes in land use in Cisarua, official data from the BPN for the current period is not yet available in its entirety.¹³

¹³ I Nyoman Mahaendrayasa, Ni Nyoman Reni Suasih, and Made Sinthya Aryasthini Mahaendrayasa, "Polemic on the Agricultural Land Conversion for Tourism Sector in the Province of Bali: Factors and Actors," *Research on World Agricultural Economy* 5, no. 4 SE-

The decision to use satellite imagery was also based on the advice of Mr. Agus Dwi Yudiyanto (Head of the Community Planning and Empowerment Section of the Bogor Regency BPN) on September 23, 2025. He directed the use of Google Earth as a solution to see physical changes in buildings in a real and independent manner. In this way, researchers can compare the rules on the Spatial Plan Map with what actually exists in the field today, so that the research results are more accurate even though the official data from the BPN has not been updated. Based on the Theory of Legal Certainty From a legal perspective, certainty requires that legal rules be enforced consistently. The Spatial Plan Map should function as a crucial instrument that provides certainty regarding land use in order to preserve the environment.

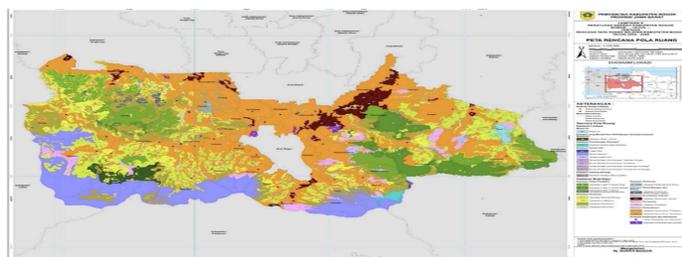
The phenomenon in Puncak shows legal uncertainty; even though the RTRW sets spatial function boundaries, conversion continues to take place gradually but extensively. This indicates that the RTRW tends to be used merely as a formal planning document, rather than as a binding operational basis for land use and licensing decisions. Empirical findings on the conversion of agricultural land in the Puncak tourism area, particularly in the Cisarua District of Bogor Regency, show that the National Land Agency (BPN) plays a central role in controlling land use. The BPN normatively has strategic authority in the regulation, control, and supervision of land use through land services, the granting and transfer of land rights, the provision of technical considerations on land, and the management of land data and information. This authority places the BPN as the main gateway in every process of changing the legal status of land, so ideally the BPN should ensure that all land use, especially in agricultural areas and buffer zones in Puncak, does not conflict with the spatial planning guidelines of Bogor Regency.

However, based on an analysis of land use maps for 2020 and 2025, significant changes in agricultural land to residential areas and non-agricultural buildings were still

Research Article (September 19, 2024): 270–82,
<https://doi.org/10.36956/rwae.v5i4.1164>.

found in the Puncak region. This fact shows that the role of the National Land Agency (BPN) in controlling land use change has not been effective. In practice, land services provided by the BPN tend to be administrative and formal in nature, namely processing land registration and transfer of land rights without substantive supervision of land use after the rights have been granted. As a result, although administratively valid, land use in the field is not in line with agricultural zoning regulations and spatial planning guidelines.

Figure 3. Spatial Planning Map for Bogor Regency for 2024-2044



Source: Bogor Regency Regulation No. 1 of 2024

The Regional Spatial Plan is a crucial instrument in regional development that serves as a framework for spatial distribution. Philosophically, spatial patterns are designed to harmonize economic, social, and environmental sustainability interests in order to achieve sustainable development. However, analysis of the Puncak tourism area shows a significant gap between policy plans and reality on the ground. Based on a comparison of the Spatial Plan Map with the 2020-2025 Cisarua Land Use Map, it can be seen that there has been a gradual but widespread change in the function of agricultural land to residential areas.

Table 2. Summary of the Conversion of Agricultural Land and Forests into Residential Areas in Cisarua Subdistrict

No	Land Allocation (RTRW Zoning)	Actual Land Use (2025)	Land Conversion Area (Ha)	Compliance Status	Percentage of Total Area (%)
1	Dryland Agricultural Area	Residential / Villa (Pp2)	3,113	Non-Compliant	43.6%
2	Plantation Forest / Estate Area	Residential / Villa (Pp2)	4,636	Non-Compliant	65.0%
3	Dryland Forest Area	Residential / Villa (Pp2)	54	Non-Compliant	0.7%
Total	Non-Built-Up Area	Built-Up Area	7,803	-	109.3%

Source : Researcher Analysis, 2026

In this study, two maps were compared, namely the Spatial Plan Map (RTRW) from Bogor Regency Regulation No. 1 of 2024 and the 2025 Field Reality Map taken from Google Earth satellite imagery. The results show that there is a problem in Cisarua District. It was found that 7,803 hectares of land were being used in a manner that did not comply with government regulations. Uniquely, this violation figure is even greater than the total area of Cisarua, which is only 7,131 hectares. This is because development in Cisarua has been unregulated, with villas piling up and spreading to cliff and forest areas where construction should not be allowed. The most land lost was in forest plantations (4,636 hectares) and dryland agriculture (3,113 hectares). On paper (local regulations), these green areas should be preserved as water catchment areas and plantations.

However, in reality, the land has been turned into rows of

villas and permanent settlements (code Pp2). This change violates Articles 47 and 29 of the latest local regulation, because areas that should be the “lungs” of the environment are instead covered by concrete buildings. This condition shows that supervision by relevant parties, including the National Land Agency (BPN), is still very weak. In accordance with Article 131 of the local regulation, the BPN should only process land documents if the development is in accordance with the spatial plan (through the KKPR mechanism). However, the large number of “non-compliant” buildings proves that many villas were built without proper permits or in violation of the law.

If left unchecked, these violations not only break the law but also damage the Puncak area and increase the risk of disasters for the areas below. The BPN should utilize its land service authority as a preventive control instrument, particularly by strictly screening every application for transfer of rights or change of land status in agricultural areas and the Puncak buffer zone. Through the provision of technical land considerations, the BPN has the discretion to reject, postpone, or impose restrictions on land use if its utilization has the potential to change the function of agricultural land as stipulated in Article 106 of the Bogor Regency Spatial Plan Regulation. In addition, the BPN should also conduct active post-grant monitoring and integrate land data with spatial data and sustainable food agriculture areas (KP2B) to prevent early land use changes.

Based on the theory of legal effectiveness proposed by Soerjono Soekanto, the success of a legal norm is not only determined by its formal existence, but also by factors that influence its implementation, namely legal substance, law enforcement officials, facilities or infrastructure, society, and legal culture. In the context of controlling agricultural land conversion, this theory is used to assess the extent to which spatial planning regulations and land authority are actually implemented consistently in practice. Thus, the analysis does not stop at the existence of the RTRW and agrarian provisions as norms (*das sollen*), but also examines their implementation in the field (*das sein*), including institutional roles, coordination, and the level of compliance with spatial

use provisions.¹⁴

The main reason why the National Land Agency (BPN) has been singled out in the issue of land conversion in the Puncak area is because the BPN occupies the most strategic and decisive structural position in the land management cycle. Large-scale conversion of agricultural land cannot occur without going through a land process, whether in the form of transfer of rights, division of land parcels, or changes in land status, all of which fall under the authority of the BPN. Thus, the failure to control land conversion identified through spatial data from 2020 to 2025 can be traced academically to a systemic failure in the land control function, rather than simply the fault of individual landowners or weak regional spatial planning policies. Therefore, empirically and normatively, it can be concluded that the Bogor Regency BPN has not fully carried out its role as an instrument for controlling land use in the Puncak tourism area. These weaknesses are reflected in the continued conversion of agricultural land that is not in accordance with the RTRW, weak post-grant supervision, and the suboptimal integration of land data with spatial planning policies.¹⁵

In this context, placing the BPN as a key actor in the analysis of land use conversion control is not a simplification of the issue, but rather a logical consequence of the strategic position and authority of the BPN in the national land management system. In addition, the issue of land use change in the Puncak area also shows that the role of the BPN has not been fully integrated with the spatial use control system implemented by local governments. Empirically, the 2020–2025 land use map data shows that changes in land

¹⁴ Rita Parmawati et al., "Sustainable Agriculture Model Development to Control Agricultural Land Conversion in Kemiren Tourism Village, Banyuwangi Regency," *Jurnal Penelitian Pendidikan IPA* 9, no. SpecialIssue SE-Research Articles (December 25, 2023): 494–99, <https://doi.org/10.29303/jppipa.v9iSpecialIssue.6700>.

¹⁵ Gunawan Prayitno et al., "Place Attachment and Agricultural Land Conversion for Sustainable Agriculture in Indonesia," *Heliyon* 7, no. 7 (2021): e07546, <https://doi.org/https://doi.org/10.1016/j.heliyon.2021.e07546>.

use are only identified after permanent buildings have been constructed, indicating that the mechanisms for monitoring and early detection of land use change are not yet effective.

The BPN has a detailed land database down to the level of individual plots, which, if integrated with spatial planning and zoning data for agricultural areas, should be able to prevent land use change before it physically occurs in the field. The failure to control agricultural land use change in the Puncak tourism area also reflects the suboptimal use of the BPN's discretionary authority in land services. In practice, the BPN tends to position itself as a passive administrative implementer rather than an active controlling actor. This attitude has implications for the structural neglect of changes in land use that are contrary to spatial plans. Therefore, academically, it can be stated that the weak control of land conversion in the Puncak area is not only a matter of weak regulations, but more a matter of the BPN not maximizing its legally mandated authority and control instruments.¹⁶

From a spatial planning law perspective, spatial plans have the status of legal norms that are binding on all legal subjects, as confirmed in Article 61 of Law Number 26 of 2007 concerning Spatial Planning, which requires everyone to comply with spatial plans and utilize space in accordance with space utilization permits. This provision emphasizes that land use is not solely determined by the legality of land rights, but also by its conformity with the applicable spatial plan. Therefore, any form of agricultural land conversion in the Puncak area that is not in accordance with the zoning of the Bogor Regency Spatial Plan (RTRW) constitutes a direct violation of spatial planning legal norms, even if it has an administrative basis for land control or transfer of land rights.

Furthermore, Article 63 paragraph (1) of the Spatial Planning Law emphasizes that controlling spatial utilization is the responsibility of the central and regional governments,

¹⁶ R Putri and Supriatna Supriatna, "Land Cover Change Modeling to Identify Critical Land in the Ciletuh Geopark Tourism Area, Palabuhanratu, Sukabumi Regency.," *IOP Conference Series: Earth and Environmental Science* 623 (January 9, 2021): 12081, <https://doi.org/10.1088/1755-1315/623/1/012081>.

which is carried out through zoning regulations, spatial utilization permits, the provision of incentives and disincentives, and the imposition of sanctions. Within this framework, land services provided by the National Land Agency (BPN), particularly the granting and transfer of land rights, are theoretically and normatively part of the spatial utilization control mechanism. When the BPN processes the transfer or division of land in agricultural areas without ensuring its compliance with the RTRW zoning, the function of controlling spatial utilization as mandated by Article 63 is not carried out substantively, but is reduced to a mere administrative procedure. In the regional context, Article 106 of the Bogor Regency Regulation on Spatial Planning explicitly prohibits changes to the function of agricultural land that has been designated as an agricultural area, except for certain strategic purposes and in accordance with the provisions of laws and regulations. This provision places agricultural areas in Cisarua Subdistrict as spaces with strict legal restrictions. Therefore, any land administration action that implies a change in the function of agricultural land without referring to and complying with Article 106 of the RTRW Regional Regulation can be viewed as a violation of regional spatial planning legal norms.

Theoretically, the provisions of Article 61, Article 63 of the Spatial Planning Law, and Article 106 of Bogor Regency Spatial Planning Regulation Number 1 of 2024 form a unified legal system for controlling spatial utilization. If these provisions are not used as the main parameters in land administration practices, then spatial planning loses its binding and controlling power. The empirical fact that agricultural land conversion is still occurring in the Puncak tourism area shows that these spatial planning norms have not been effectively internalized in land management practices, particularly by the National Land Agency (BPN) as the institution at the starting point of land legal status changes. Thus, from a spatial planning law perspective, the issue of agricultural land conversion in the Puncak area cannot be understood solely as an individual violation by landowners, but rather as a structural failure in the implementation of spatial utilization control obligations by

the government. The BPN, as part of the state apparatus that performs land service functions, is normatively bound by the obligation to control spatial utilization as stipulated in Article 63 of the Spatial Planning Law and the prohibition on converting agricultural land in Article 106 of the Bogor Regency Spatial Planning Regulation.

C. Efforts by the Bogor Regency National Land Agency to Prevent Land Use Change in the Puncak Area

Based on field research and a review of documents and policies issued by the Bogor Regency Land Office, it was found that the National Land Agency has made various efforts to prevent land use change in the Puncak Region, particularly in Cisarua District. These efforts can be classified into two types, namely preventive efforts and repressive efforts.

1. Preventive Efforts

a. Policy of Rejecting Recommendations for Land Use Change in LP2B Areas

The most fundamental preventive effort undertaken by the Bogor Regency Land Office is to implement a strict policy of not recommending land use change for areas included in the Sustainable Food Agriculture Area (LP2B). The Head of the Bogor Regency ATR/BPN Office, Yuliana, officially stated that her office “will not issue recommendations for land use conversion” for protected lands.¹⁷ This policy is a form of preventive rejection of all applications that violate spatial planning regulations and is in line with the directive of ATR/BPN Minister Hadi Tjahjanto, who requested that agricultural land in Bogor Regency be preserved.¹⁸ This policy

¹⁷ Kepala Kantor ATR/BPN Kabupaten Bogor, Yuliana, Dalam Pernyataan Resmi Tahun 2024, n.d.

¹⁸ Afdhalul Ikhsan Kontributor Kabupaten Bogor, “Datang Ke Puncak Bogor, Hadi Tjahjanto Selesaikan Konflik Agraria 25 Tahun,” *KOMPAS.Com* (Kompas.com, 2023),

is based on the consideration that agricultural land in Bogor Regency, in addition to producing rice, also has the potential to be a tourist attraction and, most importantly, functions as a vital water catchment area for downstream areas such as Jakarta, Bekasi, and Karawang.¹⁹

b. Gemapatas Program (Joint Movement for Land Boundary Installation)

The Bogor Regency Land Office also collaborates with the community to install their land boundaries independently through the Gemapatas program.²⁰ This step is important to prevent potential agrarian conflicts, ranging from overlapping ownership disputes to land grabbing. The main objective of this program is to raise awareness among landowners to install land boundaries so that their land is not taken or annexed by unauthorized parties. With certainty regarding land boundaries, it is hoped that the community can defend their land from attempts by developers or other parties to convert agricultural land into commercial land such as villas, hotels, or restaurants.

c. Providing Input to the Local Government

The Bogor District BPN actively provides input to the Bogor District Government so that existing LP2Bs are maintained and no land use changes occur. This demonstrates the role of the BPN in cross-sectoral coordination for spatial control. The input provided includes

<https://bandung.kompas.com/read/2023/03/31/065153478/datan-g-ke-puncak-bogor-hadi-tjahjanto-selesaikan-konflik-agraria-25-tahun?page=all>.

¹⁹ I Dewa Putu Suardi et al., "Management Policies Implication for the Agricultural Land Conversion Sustainable Control Strategy in Bali Province," *Journal of Environmental Management and Tourism* 13 (June 3, 2022): 721, [https://doi.org/10.14505/jemt.v13.3\(59\).12](https://doi.org/10.14505/jemt.v13.3(59).12).

²⁰ Naryo, "Kantor Pertanahan Bogor II Ajak Warga Pasang Tanda Batas Lahan Cegah Konflik," *ANTARA News Megapolitan*, 2025, <https://megapolitan.antaranews.com/berita/419729/kantor-pertanahan-bogor-ii-ajak-warga-pasang-tanda-batas-lahan-cegah-konflik>.

land data, maps of protected land, and policy recommendations that need to be taken by the Bogor District Government to strengthen control over land use changes.

2. Repressive Measures (Enforcement)

a. Licensing Supervision and Evaluation

The BPN, together with the local government, evaluates building permits issued for structures located in areas that should be protected. This is in line with the Bogor Regency Government's strategic plan to propose the reforestation of areas owned by PTPN VIII in the Puncak region as a follow-up measure to prevent disasters and restore environmental damage caused by rampant land conversion. The evaluation of permits is carried out by matching the land data owned by the BPN with the permits issued by the Bogor Regency Investment and Integrated Services Agency (DPMPTSP) and the Building Permits (PBG) issued by the Housing, Settlement, and Land Agency (DPKPP).²¹

b. Coordination with Law Enforcement Officials

In cases of serious violations, the BPN coordinates with provincial and regency governments and law enforcement officials to take decisive action. This coordination includes the Ministry of Forestry, the central Ministry of Agrarian Affairs and Spatial Planning/BPN, the West Java Provincial Government, the Bogor Regency Government, and the police.²² The coordination includes joint enforcement against buildings that violate spatial planning regulations. As stated by the Director of Forestry Crime Enforcement at the Ministry of Forestry, Rudianto Saragih Napitu, enforcement is carried out by a joint team as a measure to protect the environment and prevent flooding caused by illegal construction in water catchment areas.²³

²¹ "Kronologi Penerbitan Izin Hibisc Fantasy Puncak Bogor," *Tirto.Id* (Tirto.id, 2025), https://tirto.id/kronologi-penerbitan-izin-hibisc-fantasy-puncak-bogor-g9ks#google_vignette.

²² "Kementerian Kehutanan," *Kehutanan*, 2025, <https://www.kehutan.go.id/pers/article-81>.

²³ Zintan Prihatini, "55 Unit Usaha Ilegal Disegel Karena Masuk

3. *Obstacles in Control Efforts*

Despite various efforts, based on interviews with BPN staff and field observations, several factors were found to hinder efforts to control land use change:

a. *Limited Authority*

The BPN only has the authority to provide recommendations regarding land use change, while location permits and building permits are issued by the DPMPTSP Office and other relevant agencies. This means that the BPN does not have the direct authority to stop ongoing construction, even if it is taking place on land that should not be converted.

b. *Weak Physical Supervision*

The BPN does not have enough field supervisors to monitor changes in land use in an area as large as the Cisarua subdistrict. As a result, many cases of land conversion go undetected until the buildings are firmly established and operational.

c. *Weak Inter-Agency Coordination*

Land data at the BPN is often not synchronized with building permit data at the relevant agencies. This lack of synchronization creates legal loopholes that developers exploit to gradually convert land use, as in the case of Hibisc Fantasy Puncak.²⁴

4. *Analysis Based on Soerjono Soekanto's Law Enforcement Theory*

Using Soerjono Soekanto's theoretical framework, the

Kawasan Hutan," *KOMPAS.Com* (Kompas.com, 2025), <https://lestari.kompas.com/read/2025/05/07/183000586/55-unit-usaha-ilegal-disegel-karena-masuk-kawasan-hutan>.

²⁴ Aprila Niravita et al., "Community Involvement in Spatial Planning: A Study of Public Participation in Lerep Tourism Village Perspective of Indonesian Spatial Planning Law," *Unnes Law Journal* 7, no. 2 (2021): 237–56.

Bogor District BPN's efforts to control land use conversion can be analyzed as follows:

Table 3. Analysis of Law Enforcement Factors in the Control of Agricultural Land Conversion by the Bogor Regency National Land Agency (BPN)

Law Enforcement Factors	Analysis of BPN Efforts
Legal Factors	Legislation related to spatial planning and agricultural land protection is adequate. Law No. 41/2009 on LP2B and the Bogor Regency Spatial Plan Regulation provide a strong legal basis for protecting agricultural land. However, there are still gaps in its implementation, especially in terms of monitoring and enforcement.
Law Enforcement Factors	The BPN has performed its preventive functions well through its policy of rejecting recommendations for land use conversion. However, in terms of enforcement, limited authority is a major obstacle. Effective law enforcement requires synergy with other agencies such as the Public Order Agency (Satpol PP) and the Investment and Integrated Licensing Service Agency (DPMPTSP).
Facilities Factors	The availability of facilities and infrastructure for monitoring is still limited. The Bogor Regency BPN needs more sophisticated mapping technology and adequate field personnel to monitor changes in land use in real time.
Community Factors	Public awareness of the law is still low. Many landowners prefer short-term economic gains by selling or converting their land, without considering the long-term environmental impact.

Cultural Factors	There has been a shift in values from land as an inheritance and source of livelihood to land as an economic commodity. This shift in values has encouraged rampant land conversion in the Puncak area.
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Source : Researcher Analysis, 2026

D. Factors Influence the Mismatch between Land Use and the Regional Spatial Plan in the Puncak Area

The mismatch between land use and the Regional Spatial Plan (RTRW) in the Puncak tourism area is influenced by various interrelated factors, including structural, institutional, and socio-economic factors. Based on an analysis of land use maps from 2020 and 2025, the conversion of agricultural land into residential areas and non-agricultural buildings has occurred gradually but extensively, especially in zones that should have been preserved as agricultural areas and environmental buffer zones according to spatial planning. This situation indicates that the RTRW has not fully functioned as an instrument to control spatial utilization at the implementation level.

“Based on the data we have, more than 1,000 hectares of tea plantations in Puncak have been converted. This is a serious concern because it has the potential to worsen environmental conditions,” said West Java Governor Dedi Mulyadi, in Bandung, Monday (3/3/2025) in an interview with Kompas.

According to Anita from the Land Affairs Section of the Bogor District National Land Agency (BPN), factors contributing to this discrepancy include the need for land for food security, infrastructure, housing, downstream industries, and public interests/projects/national strategic programs, which are among the factors causing discrepancies between

existing land use and the spatial plans (RTR) established by district/city governments. According to the Executive Director of Wahana Lingkungan Hidup Indonesia (walhi) in an interview with DetikJabar, one of the main factors influencing this incompatibility is weak institutional control in land services and development licensing.

“One of the things we found is that many buildings are still being constructed without complying with spatial planning regulations, while conservation and environmental restoration efforts are still minimal, including by developers and the government,” he said.

Empirically, land use conversion continues to occur even though the RTRW has established spatial function restrictions, indicating that the mechanisms for monitoring and screening spatial planning compliance are not yet functioning effectively. The absence of administrative rejection or restrictions on land use in agricultural areas shows that the RTRW is more often used as a formal planning document rather than as an operational basis for land use and licensing decisions. Another factor is the high economic pressure and strategic value of the Puncak area as a tourist destination. According to the Executive Director of Wahana Lingkungan Hidup Indonesia (walhi) in an interview with DetikJabar²⁵

“Environmental experts and activists have long warned about the dangers of land conversion and development that ignores the carrying capacity of the environment in the Puncak region. However, short-term economic interests often override long-term sustainability considerations,” he said.

According to Mr. Agus Dwi Yudiyanto from the

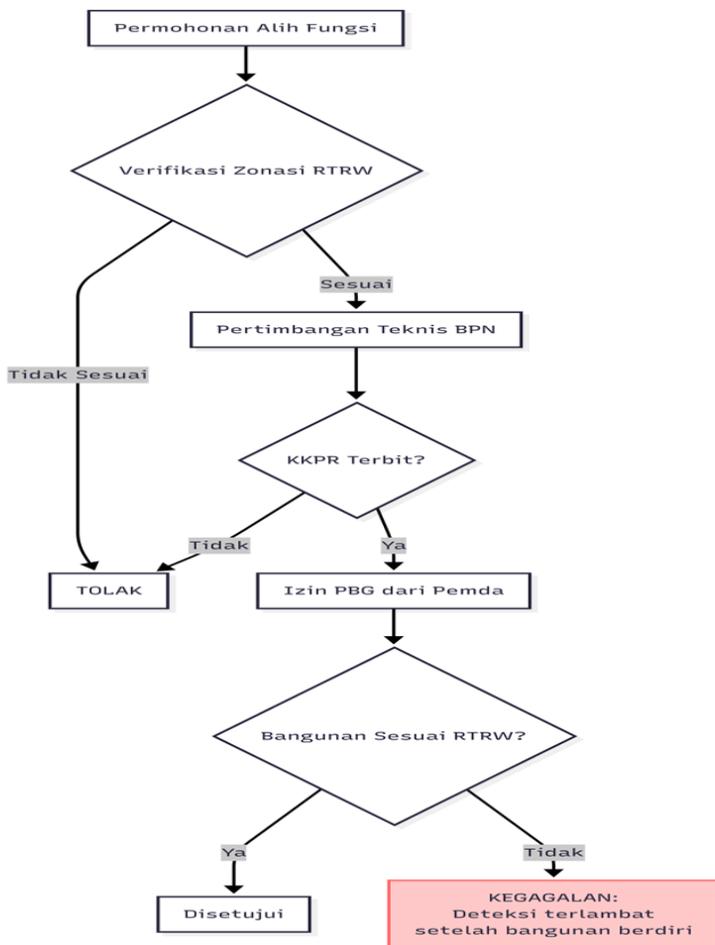
²⁵ N Wijayanto et al., “Land Function Transfer: The Transformation of Agriculture Land to Agriculture Tourism Sites in Polobogo, Semarang,” *IOP Conference Series: Earth and Environmental Science* 1114 (December 1, 2022): 12080, <https://doi.org/10.1088/1755-1315/1114/1/012080>.

community planning and empowerment section of the Bogor Regency National Land Agency (BPN), on September 23, 2025, the National Land Agency (BPN) only provided considerations in the context of implementing the administration of land use and utilization, whereby these considerations served as input to the authorities in formulating policies on spatial utilization. Specifically, in the context of land services, the Building Permit (PBG) is issued by the local government. Thus, the inconsistency between land use and the Spatial Plan (RTRW) in the Puncak area cannot be understood as a single issue, but rather as the result of a combination of economic pressures from the tourism sector, weak institutional control, lack of coordination between agencies, low effectiveness of supervision, and low legal awareness among the community.

This finding confirms that the existence of RTRW as a spatial control instrument must be accompanied by strengthening the institutional role, especially of the National Land Agency (BPN) and local governments, so that spatial plans do not only remain at the normative level, but actually function in the practice of land use management. The role of the National Land Agency (BPN) of Bogor Regency in controlling land use change is focused on protecting Protected Rice Fields (LSD) and Sustainable Food Agricultural Land (LP2B) through administrative, measurement, and mapping functions. BPN acts as a technical regulator that ensures spatial utilization is in accordance with the Regional Spatial Plan (RTRW).²⁶

²⁶ Asri Suryaningtyas and Asmarani Ramli, "Pengaturan Hukum Pengelolaan Wilayah Pesisir Ditinjau Dari Segi Tata Ruang Dan Masyarakat Di Kabupaten Rembang," *Jurnal Magister Hukum Udayana (Udayana Master Law Journal)* 14 (November 26, 2025): 815–39, <https://doi.org/10.24843/JMHU.2025.v14.i03.p15>.

Chart 1. Control Flow for Land-Use Conversion with Identified Failure Points



Source : *Researcher Analysis, 2026*

The potential points of failure in spatial control can be summarized in a comprehensive analysis. Based on the land service flowchart, control failures often begin at an early stage, namely in the process of verifying the suitability of the RTRW, which is not strictly enforced in agricultural and protected areas. According to Ms. Anita from the Land Section of the Bogor District BPN, the ATR/BPN plays a role in supervising and controlling land use changes. However, the current control role has not been optimal due to the inconsistency between current land use and the spatial plan, so control needs to be strengthened through collaboration

and integration of land protection into the spatial plan.

Based on Policy Implementation Theory (Law Enforcement), the success of a regulation is highly dependent on its implementation process. Referring to the theory of Daniel Mazmanian and Paul Sabatier, the implementation of spatial planning policy in Cisarua is hampered by inter-agency coordination factors. The flowchart shows that the verification of the RTRW and Technical Land Considerations involves complex legal bases, ranging from Law No. 26/2007 to Government Regulation No. 21/2021. Implementation failures occur because the monitoring and control instruments are not in line with the land administration stage, so that early detection of land use changes cannot be carried out before permanent buildings are erected.

Thus, this process confirms that the failure to control agricultural land conversion cannot be separated from the effectiveness of the implementation of BPN's authority at every stage of land services. If the zoning verification and technical land considerations stages are not carried out substantively, then the prohibition on agricultural land conversion as stipulated in Bogor Regency Regulation No. 1 of 2024 has the potential to lose its binding force in practice, so that spatial utilization control becomes reactive rather than preventive.

1. Case Study Example: Demolition of Buildings by West Java Governor Dedi Mulyadi as a Form of Land Use Control

a. Chronology of the Hibisc Fantasy Puncak Case

On March 6, 2025, West Java Governor Dedi Mulyadi directly ordered the demolition of the Hibisc Fantasy tourist building in Puncak, Bogor Regency.²⁷ The demolition order was based on findings that the tourist building violated environmental regulations and land permits, and was

²⁷ Metro TV, "Dedi Mulyadi Akan Bongkar Hibisc Fantasy Puncak," *Https://Www.Metrotvnews.Com*, 2025, <https://www.metrotvnews.com/play/KXyCQw80-dedi-mulyadi-akan-bongkar-hibisc-fantasy-puncak>.

considered one of the causes of flash floods that had occurred in the Puncak area some time before. Hibisc Fantasy is managed by PT Jaswita Lestari Jaya, a subsidiary of PT Jasa dan Kepariwisata (Jaswita) Jabar, which was established on February 8, 2018. This company manages land owned by PTPN through an Operational Cooperation Scheme (KSO) to be developed into a tourist area. Based on the chronology of the licensing process disclosed by the Head of the Bogor Regency Investment and Integrated Services Agency (DPMPTSP), Irwan Purnawan, the series of permits issued for Hibisc Fantasy Puncak began with an application from PT Jasa dan Kepariwisata (Jaswita) and PT Perkebunan Nusantara (PTPN) as the land owners located in Tugu Selatan Village, Cisarua District, Bogor.

PT Jaswita, through a joint operation system with PTPN, began the process of obtaining a Spatial Utilization Conformity Permit (KKPR) from the Bogor Regency Public Works and Spatial Planning Agency (DPUPR) in December 2022. Then, in November 2023, the Bogor Regency Government, through the Environmental Agency (DLH), issued an environmental impact assessment (amdal) document for Hibisc Fantasy Puncak. *“After that, there was a PBG (Building Permit) application through the DPKPP (Agency for Housing, Settlements, and Land),” explained Irwan.*

Facts of the Violation:

- a. Initial permit: The company obtained a permit to manage an area of 4,800 square meters
- b. Realization: The recreation area actually covers an area of 15,000 square meters (an excess of more than 200%)
- c. The investment that has been spent is estimated to reach IDR 40 billion

Dedi Mulyadi emphasized that this demolition was an example to everyone, regardless of who they were, even though the violator was a regionally-owned enterprise belonging to the West Java Provincial Government itself. “First, we will revoke the regional regulation, then restore West Java to its original condition in accordance with

adequate planning aspects that provide safety for residents, not only West Java residents but also DKI Jakarta residents,” said Dedi. He also added that he would coordinate with DKI Jakarta Governor Pramono Anung to discuss the Puncak area because West Java is the “gateway to DKI”.²⁸

Table 4. Examples of Illegal Building Demolition and Land Reorganization in Several Areas of West Java

Location	Type of Building Demolished	Context/Description
Kali Sepak, Kab. Bekasi	Dozens of illegal buildings	Buildings on the riverbank that obstructed water flow and caused flooding; part of river normalization efforts.
Kampung Gabus, Kab. Bekasi	Residents' stalls	Located on land owned by Perum Jasa Tirta (PJT); the owners claim to be the grandchildren of the former Bekasi Regent.
TPA Sarimukti, Bandung Barat	Shanties (stalls, kiosks, shacks)	Reorganization of the landfill area; residents were relocated and received financial compensation.
Jalur Bandung-Subang	Hundreds of illegal buildings (stalls, merchant kiosks)	Enforcement along the Wates, Ciater, to Cagak route to restore the function of the green belt
Saluran Pasirpanggang, Karawang	Rental houses, shop houses, buildings on PJT II land	Channel normalization for flood prevention; buildings stand on state land without permission.

Source : Researcher Analysis, 2026

²⁸ Metro TV, “Dedi Mulyadi Akan Bongkar Hibisc Fantasy Puncak,” *Https://Www.Metrotvnews.Com,2025*, <https://www.metrotvnews.com/play/KXyCQw80-dedi-mulyadi-akan-bongkar-hibisc-fantasy-puncak>.

2. Factors Contributing to the Demolition

Based on Dedi Mulyadi's statement and the facts on the ground, the demolition of Hibisc Fantasy Puncak can be analyzed from two perspectives, namely economic factors and political factors.

a. Economic Factors

Table 5. Economic Impact Analysis of Environmental Violations and Building Demolition in the Puncak Area)

Economic Aspects	Analysis
Losses due to flooding	Dedi Mulyadi stated that development activities that violate the basic principles of environmental management raise suspicions of flooding and flood-related deaths, which are risks that must be borne by the company. Flooding in the downstream areas (Karawang, Bekasi, Jakarta) each year causes economic losses that are far greater than the profits from a single tourist attraction in the Puncak area.
Lost investment costs	This demolition resulted in a loss of Rp 40 billion in investment that had been spent by PT Jaswita Lestari Jaya. Dedi Mulyadi stated that the business risk must be borne by the company because the development was carried out without regard for environmental aspects and violated the established permit.
Economic value of water catchment areas	Dedi Mulyadi emphasized that all areas within the plantation that function as water catchment areas must be restored to forest areas because they are beneficial for protecting communities in downstream areas. This shows that long-term economic considerations (disaster prevention) are prioritized over short-term economic gains from the tourism sector.
Environmental restoration costs	The government must spend a considerable amount of money to restore the hydrological function of the Puncak area through reforestation and river normalization programs. The Ministry of Forestry aims to

	restore the forest area through forest rehabilitation and strengthened supervision of land use in the Puncak region.
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Source : Researcher Analysis, 2026

Based on this economic analysis, it can be concluded that the demolition was based on the consideration that the economic losses caused by flooding resulting from land conversion far outweighed the benefits of tourism investment. The demolition was a form of internalization of environmental costs that had been ignored in economic calculations for development in the Puncak area.²⁹

b. Politic Factor

Table 6. Political Aspect Analysis of Law Enforcement and Spatial Planning Control in the Puncak Area

Political Aspects	Analysis
Ownership of Regionally-Owned Enterprises	The Hibisc Fantasy case attracted public attention because the violator was a regionally-owned enterprise belonging to the West Java Provincial Government itself. Dedi Mulyadi showed political courage by demolishing a building belonging to his "own subordinates" only a few weeks after being inaugurated. This action sent a strong signal that law enforcement is impartial and will be applied to anyone, including government institutions.
Political momentum	The demolition took place on March 6, 2025, less than a month after Dedi Mulyadi was inaugurated as Governor of West Java on February 20, 2025. This action can be interpreted as a political statement that the

²⁹ "Kemenhut Tertibkan Vila Di Kawasan Hutan Produksi Puncak Bogor," <https://www.mnctrijaya.com/>,2025, <https://www.mnctrijaya.com/news/detail/70796/kemenhut-tertibkan-vila-di-kawasan-hutan-produksi-puncak-bogor>.

	new governor is seriously committed to cleaning up the Puncak area and will not tolerate any violations of spatial planning, no matter how small.
Central-regional relations	This case also involved intensive coordination between the central and regional governments. Minister of Forestry Raja Juli Antoni stated that the government would not tolerate actions that damage the forest ecosystem, especially in areas with a high risk of natural disasters. Meanwhile, Minister of State-Owned Enterprises Erick Thohir also mapped PTPN land to ensure that it was being used for its intended purpose. This synergy between the central and regional governments strengthened Dedi Mulyadi's political position in enforcing order.
Public pressure	The flash floods that occurred in the Puncak area sparked public outrage and demands for the government to take immediate action. Dedi Mulyadi's decisive action was a response to political pressure from the community, who wanted illegal buildings in the water catchment area to be removed. ³⁰
Regional impact	Dedi Mulyadi explicitly stated that the Puncak area is the "gateway to DKI Jakarta" and that he would coordinate with the Governor of DKI Jakarta to discuss the construction of villas and other buildings in Puncak. This shows that the crackdown in Puncak has a regional political dimension involving two large provinces.
Acceleration of regulations	After the demolition, the West Java Provincial Government drafted a Governor's Regulation on land use control in response to various violations that had occurred. In addition, the government also targeted June 2025 to begin river normalization in the form

³⁰ "Kemenhut Tertibkan Vila Di Kawasan Hutan Produksi Puncak Bogor."

	of embankments and river boundaries. This step shows an acceleration of policy as a political impact of the Hibisc Fantasy case.
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Source : Researcher Analysis, 2026

Based on the analysis of these political factors, it can be concluded that the demolition of Hibisc Fantasy was a combination of the political courage of the newly appointed regional head, strong public pressure due to the flood disaster, and full support from the central government to clean up the Puncak area. This political momentum was used to take decisive action that had never been taken before against violations in the Puncak area.

3. *Case Analysis Using Soerjono Soekanto's Law Enforcement Theory*

Using Soerjono Soekanto's theoretical framework of the five factors that influence law enforcement, the case of the demolition of Hibisc Fantasy Puncak can be analyzed as follows:

Table 7. Analysis of Law Enforcement Factors in the Hibisc Fantasy Puncak Case

Factors	Analysis of the Hibisc Fantasy Puncak Case
Legal Factors	There is a clear violation of licensing regulations, in which the area of land developed (15,000 m ²) exceeds the permit granted (4,800 m ²). In addition, development in an area that functions as a water catchment also violates spatial planning regulations that protect the upper reaches of the Ciliwung River Basin. The law clearly stipulates prohibitions and sanctions, but enforcement was weak before the governor intervened.
Law Enforcement Factors	The National Land Agency (BPN) and related agencies in Bogor Regency had previously failed to conduct effective supervision, allowing violations in the form of land expansion of up to 200% of the permit to occur undetected. It was

	only after the governor intervened and ordered the demolition that law enforcement officials moved quickly. This shows that the authorities actually have the capacity to take action, but political will is the determining factor.
Facilities Factor	Heavy equipment and adequate personnel were available to demolish the 15,000 m ² building, showing that law enforcement facilities and resources were actually available. What was lacking was the coordination and command to deploy these resources. Once the governor gave the order, all resources could be mobilized quickly.
Community Factors	Community Factors Communities affected by flooding in downstream areas fully support the demolition. There is a collective awareness that water catchment areas must be protected and illegal buildings must be regulated. This community support strengthens the legitimacy of the demolition carried out by the government.
Cultural Factors	There has been a paradigm shift in public policy: from an orientation towards “pursuing investment and local revenue” to a paradigm of “sustainable development and disaster mitigation.” Dedi Mulyadi articulates the values of environmental preservation as a priority that must take precedence over business interests and short-term investment.

Source : Researcher Analysis, 2026

4. Implications of the Case for Land Use Control in the Puncak Area

The demolition of Hibisc Fantasy Puncak has significant implications for land use control efforts in the Puncak area in general:³¹

a. Deterrent Effect for Violators

The demolition of buildings owned by the West Java Provincial BUMD sends a strong signal that there is zero tolerance for spatial planning violators, regardless of the

³¹ Soekanto, “Faktor-Faktor Yang Mempengaruhi Penegakan Hukum.”

severity of the violation or the identity of the perpetrator. This is expected to have a deterrent effect on other developers who may intend to commit similar violations.

b. Strengthened Coordination Between Institutions

After the incident, coordination between various agencies with authority in the Puncak area was strengthened. The Bogor Regency Government submitted four strategic plans to the Governor and Minister of State-Owned Enterprises, including the reforestation of PTPN VIII land. The Ministry of Forestry, together with the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency, also took action against illegal buildings in production forest areas, such as the Forest Hill villa in Tugu Utara Village, Cisarua District.

c. Acceleration of Regulatory Revision

This case prompted the West Java Provincial Government to draft a Governor Regulation on land use control in response to the various violations that have occurred so far. This new regulation is expected to close the legal loopholes that have been exploited by developers.

d. River Normalization and Forest Rehabilitation

The government aims to begin river normalization projects in June 2025, including the construction of embankments and riverbanks. In addition, the Ministry of Forestry will also carry out forest rehabilitation and strengthen supervision of land use in the Puncak region.

e. Increased Monitoring

Minister of Forestry Raja Juli Antoni emphasized that the Ministry of Forestry, together with the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency, will carry out preemptive collaborative action through identification, monitoring, and periodic evaluation in the Puncak region. Several critical points will be the focus of observation to map activities that are not in accordance with the function of the

region.³²

D. Conclusion

Based on an analysis of land use maps for the Cisarua subdistrict in the Puncak tourism area in 2020 and 2025, it was found that there had been a noticeable and widespread change in land use from agricultural to residential and non-agricultural buildings. This change was not sporadic, but rather formed a pattern of distribution that followed the accessibility of the area and its proximity to the center of tourism activities. Empirically, this change occurs in areas that are still designated as agricultural and buffer zones in the Bogor Regency Spatial Plan (RTRW), indicating a discrepancy between spatial planning and actual land use practices in the field.

The empirical findings of this study show that the discrepancy between land use and the RTRW in the Puncak tourism area is the result of weak control over land use at the implementation stage. The RTRW has not functioned as an effective control tool because it has not been followed by integrated monitoring and control mechanisms. Therefore, controlling land use change in the Puncak area requires a shift in approach from merely normative regulation to strengthening spatial data-based monitoring and active use of institutional authority, especially by the National Land Agency (BPN) as the main manager of land data and services.

E. References

- Abellán, Francisco, and Carmen Martínez. "Landscape and Tourism as Tools for Local Development in Mid-Mountain Rural Areas in the Southeast of Spain (Castilla-La Mancha)." *Land* 10 (February 22, 2021): 221. <https://doi.org/10.3390/land10020221>.
- Walhi Sebut Alih Fungsi Lahan di Puncak Bogor Sudah Bertahun-Tahun Terjadi <https://apps.detik.com/detik/https://www.detik.com>

³² *Ibid.*

- ik.com/jabar/berita/d-7811701/walhi-sebut-alih-fungsi-lahan-di-puncak-bogor-sudah-bertahun-tahun-terjadi
- Diah Utari Dewi, Nyoman, Desak Made Trisna Juliantari Dewi, Ida Ayu Putu Sri Widnyani, and Ni Putu Tirka Widanti. "Regulating Land-Use Conversion for Sustainable Tourism: A Case Study of Lodtunduh Village, Ubud." *Iapa Proceedings Conference; 2024: AAPA-EROPA-AGPA-IAPA International Conference 2024 Towards World Class Bureaucracy*, 2024. <https://doi.org/10.30589/proceedings.2024.1159>.
- Amady, M Rawa El, Rina Novia Yanti, Alexuxanto, and Marta Dinata. "Local Actions Prevent Land Conversion through Tourism in Rokan Koto Ruang Village, Rokan Hulu, Riau, Indonesia." *E3S Web Conf.* 593 (2024). <https://doi.org/10.1051/e3sconf/202459307003>.
- Ghadami, Mostafa, Andreas Dittmann, Mousa Pazhuhan, and Naser Firouzjaie. "Factors Affecting the Change of Agricultural Land Use to Tourism: A Case Study on the Southern Coasts of the Caspian Sea, Iran." *Agriculture* 12 (January 10, 2022): 90. <https://doi.org/10.3390/agriculture12010090>.
- Habibi, Kyoumars, Milad Pira, Arman Rahimi, Golshan Hemati, and Hooshmand Alizadeh. "Ecological Footprint Analysis of Tourism Management in Rural Areas." *Journal of Environmental Planning and Management* 67 (January 12, 2023): 1–13. <https://doi.org/10.1080/09640568.2022.2156852>.
- Hyasat, Ali. "Awareness and Perception Toward Heritage, Life, and Tourism in Converting Tourism Area." *Journal of Environmental Management and Tourism* 14 (December 29, 2023): 3006. [https://doi.org/10.14505/jemt.v14.8\(72\).03](https://doi.org/10.14505/jemt.v14.8(72).03).
- "Kemenhut Tertibkan Vila Di Kawasan Hutan Produksi Puncak Bogor." <https://www.Mnctrijaya.Com/>, 2025. <https://www.mnctrijaya.com/news/detail/70796/kemenhut-tertibkan-vila-di-kawasan-hutan-produksi-puncak-bogor>.
- "Kementerian Kehutanan." *Kehutanan*, 2025. <https://www.kehutanan.go.id/pers/article-81>.
- Kepala Kantor ATR/BPN Kabupaten Bogor, Yuliana, Dalam

- Pernyataan Resmi Tahun 2024*, n.d.
- Kontributor Kabupaten Bogor, Afdhalul Ikhsan. "Datang Ke Puncak Bogor, Hadi Tjahjanto Selesaikan Konflik Agraria 25 Tahun." *KOMPAS.Com*. Kompas.com, 2023. <https://bandung.kompas.com/read/2023/03/31/065153478/datang-ke-puncak-bogor-hadi-tjahjanto-selesaikan-konflik-agraria-25-tahun?page=all>.
- "Kronologi Penerbitan Izin Hibisc Fantasy Puncak Bogor." *Tirto.Id*. Tirto.id, 2025. https://tirto.id/kronologi-penerbitan-izin-hibisc-fantasy-puncak-bogor-g9ks#google_vignette.
- Mahaendrayasa, I Nyoman, Ni Nyoman Reni Suasih, and Made Sinthya Aryasthini Mahaendrayasa. "Polemic on the Agricultural Land Conversion for Tourism Sector in the Province of Bali: Factors and Actors." *Research on World Agricultural Economy* 5, no. 4 SE-Research Article (September 19, 2024): 270–82. <https://doi.org/10.36956/rwae.v5i4.1164>.
- Naryo. "Kantor Pertanahan Bogor II Ajak Warga Pasang Tanda Batas Lahan Cegah Konflik." *ANTARA News Megapolitan*, 2025. <https://megapolitan.antaranews.com/berita/419729/kantor-pertanahan-bogor-ii-ajak-warga-pasang-tanda-batas-lahan-cegah-konflik>.
- Niravita, Aprila, Rofi Wahanisa, Suhadi Suhadi, Rahayu Fery Anitasari, and Bayangsari Wedhatami. "Community Involvement in Spatial Planning: A Study of Public Participation in Lerep Tourism Village Perspective of Indonesian Spatial Planning Law." *Unnes Law Journal* 7, no. 2 (2021): 237–56.
- Nistoreanu, Puiu, Alina-Cerasela Aluculesei, and George-Cornel Dumitrescu. "A Bibliometric Study of the Importance of Tourism in Salt Landscapes for the Sustainable Development of Rural Areas." *Land* 13 (October 18, 2024). <https://doi.org/10.3390/land13101703>.
- Pandya, Revati, Hari Dev, Nitin Rai, and Robert Fletcher. "Rendering Land Touristifiable: (Eco)Tourism and Land Use Change." *Tourism Geographies* 25 (May 28, 2022): 1–17. <https://doi.org/10.1080/14616688.2022.2077425>.

- Parmawati, Rita, Indah Yanti, Luchman Hakim, Fahdynia Kamira Gunawan, Nadhea Oktaviantina Rahmawati, and Fadhil Muhammad. "Sustainable Agriculture Model Development to Control Agricultural Land Conversion in Kemiren Tourism Village, Banyuwangi Regency." *Jurnal Penelitian Pendidikan IPA* 9, no. SpecialIssue SE-Research Articles (December 25, 2023): 494–99. <https://doi.org/10.29303/jppipa.v9iSpecialIssue.6700>.
- Prayitno, Gunawan, Dian Dinanti, Izzatul Ihsansi Hidayana, and Achmad Tjachja Nugraha. "Place Attachment and Agricultural Land Conversion for Sustainable Agriculture in Indonesia." *Heliyon* 7, no. 7 (2021): e07546. <https://doi.org/https://doi.org/10.1016/j.heliyon.2021.e07546>.
- Prihatini, Zintan. "55 Unit Usaha Ilegal Disegel Karena Masuk Kawasan Hutan." *KOMPAS.Com*. Kompas.com, 2025. <https://lestari.kompas.com/read/2025/05/07/183000586/55-unit-usaha-ilegal-disegel-karena-masuk-kawasan-hutan>.
- Putri, R, and Supriatna Supriatna. "Land Cover Change Modeling to Identify Critical Land in the Ciletuh Geopark Tourism Area, Palabuhanratu, Sukabumi Regency." *IOP Conference Series: Earth and Environmental Science* 623 (January 9, 2021): 12081. <https://doi.org/10.1088/1755-1315/623/1/012081>.
- Saha, Jayanta, and Suman Paul. "An Insight on Land Use and Land Cover Change Due to Tourism Growth in Coastal Area and Its Environmental Consequences from West Bengal, India." *Spatial Information Research* 29 (October 1, 2020): 1–16. <https://doi.org/10.1007/s41324-020-00368-0>.
- Soekanto, Soerjono. "Faktor-Faktor Yang Mempengaruhi Penegakan Hukum," 2011, 59.
- Suardi, I Dewa Putu, Widhianthini Widhianthini, Gede Arisena, Raden Suyarto, and Anak Krisnandika. "Management Policies Implication for the Agricultural Land Conversion Sustainable Control Strategy in Bali Province." *Journal of Environmental Management and Tourism* 13 (June 3, 2022): 721. [https://doi.org/10.14505/jemt.v13.3\(59\).12](https://doi.org/10.14505/jemt.v13.3(59).12).
- Suryaningtyas, Asri, and Asmarani Ramli. "Pengaturan Hukum

- Pengelolaan Wilayah Pesisir Ditinjau Dari Segi Tata Ruang Dan Kemasyarakatan Di Kabupaten Rembang." *Jurnal Magister Hukum Udayana (Udayana Master Law Journal)* 14 (November 26, 2025): 815–39. <https://doi.org/10.24843/JMHU.2025.v14.i03.p15>.
- TV, Metro. "Dedi Mulyadi Akan Bongkar Hibisc Fantasy Puncak." *Https://Www.Metrotvnews.Com*, 2025. <https://www.metrotvnews.com/play/KXyCQw80-dedi-mulyadi-akan-bongkar-hibisc-fantasy-puncak>.
- Wijayanto, N, Tomi Agfianto, F Najicha, and A Nugroho. "Land Function Transfer: The Transformation of Agriculture Land to Agriculture Tourism Sites in Polobogo, Semarang." *IOP Conference Series: Earth and Environmental Science* 1114 (December 1, 2022): 12080. <https://doi.org/10.1088/1755-1315/1114/1/012080>.

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