

# Apartment Management Model: A Comparative Study between Pekunden Semarang and Singapore Rusunawa

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## Abstract

Flats are essential infrastructure designed for various purposes, including providing adequate housing for low-income communities. However, policy implementation has yet to be fully effective, as shown by the Pekunden Public Rental Flats (Rusunawa Pekunden) in Semarang, which face issues such as the absence of targeted government policies to address stagnant living patterns of low-income residents and weak management structures. This study aims to: (1) examine the penetration of Singapore's Housing and Development Board (HDB) Ethnic Integration Policy into Indonesia's public housing regulations; And (2) analyze the application of Singapore's housing concepts and policies to improve the effectiveness of flat management in Indonesia. This qualitative research adopts a literature review approach to explore concepts, regulations, and best practices in



housing management. The findings indicate that socio-economic segregation can be mitigated through regulatory reforms, including requiring at least 20% of commercial flat floor area to be allocated to low-income residents within the same development. Moreover, adopting HDB principles highlights the importance of centralized management, transparent financing, and social integration policies. In conclusion, strengthening regulations, innovating financing mechanisms, and promoting community participation are key strategies for creating effective, inclusive, and sustainable vertical housing that meets Indonesia's urban development needs.

## KEYWORDS

Ethnic Integration Policy; Housing and Development Board; Low-Income Communities; Public Housing Regulation Penetration; Vertical Housing

## Introduction

Indonesia is one of the most populous countries. The Central Statistics Agency (BPS) records that Indonesia has a population of at least 282,477,584 (two hundred eighty-two million four hundred seven hundred seven thousand five hundred eighty-four) people. According to the BPS, the population of Semarang City will reach 1,708,833 (one million seven hundred eight thousand eight hundred thirty-three) in 2024. The large population, coupled with the high number of Low-Income Communities (hereinafter abbreviated as MBR), has resulted in a land crisis in Semarang.<sup>1</sup> According to data from the Semarang City Housing and Settlement website, Semarang City has a backlog of 163,643 units of land ownership and 94,962

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<sup>1</sup> Alfikri, M. H. (2024). Analisis Penerapan Konsep Arsitektur Biophilic Pada Desain Mix Use Building Co-working Dan Apartemen Di Semarang. *Journal of Islamic Art and Architecture* (JIAA), 101. <https://journal.walisongo.ac.id/index.php/JIAA/article/view/20763>

units of housing.<sup>2</sup>

From the data above, apart from showing indications of a land crisis, it also shows indications of a housing crisis in the city of Semarang. To overcome this, the Semarang City Government has built approximately twenty-two Simple Rental Flats (hereinafter abbreviated as Rusunawa.<sup>3</sup> However, even so, the problem of the waiting list for prospective flat residents (hereinafter abbreviated as Rusun) who will occupy the Rusun (waiting list) remains unresolved due to many internal problems such as residents who do not want to leave the Rusunawa, the indecisiveness of the Rusunawa management and other problems.<sup>4</sup> In addition to these problems, according to researchers, there are also problems with building standards and also Green Open Space (hereinafter abbreviated as RTH), as a general description, RTH is an area either in groups or elongated which is open and becomes a place for plants to grow both naturally and artificially (planted).<sup>5</sup> According to researchers, the materials and buildings of Rusun in Semarang City can be assessed as buildings that have been used for a long time and are not maintained even though they have been built for a long time, but it is natural for a building to be maintained and renovated rather than left alone.

According to researchers, this indicates that in the development process, the developer can be said to only focus on completing the construction of Rusunawa Pekunden as soon as possible so that it can be immediately

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<sup>2</sup> Perumahan dan Kawasan Permukiman. (2020). PKP Kota Semarang. [https://perkim.id/profil-pkp/profil-kabupaten-kota/profil-perumahan-dan-kawasan-permukiman-kota-semarang/#:~:text=Saat ini pemenuhan kebutuhan rumah,backlog penghunian mencapai 94.962 unit](https://perkim.id/profil-pkp/profil-kabupaten-kota/profil-perumahan-dan-kawasan-permukiman-kota-semarang/#:~:text=Saat%20ini%20pemuhan%20kebutuhan%20rumah,backlog%20penghunian%20mencapai%2094.962%20unit). Accessed on 26 June 2025.

<sup>3</sup> Saleh, M., & Setiyoningrum, A. (2024). Permasalahan dan Solusi Kebijakan Dalam Pemanfaatan Rumah Susun Sewa (Rusunawa) yang Efektif dan Efisien di Kota Surabaya. *Notaire*, 7(1). <https://doi.org/10.20473/ntr.v7i1.55236>

<sup>4</sup> Wardana, K. A., Rahayu, R., & Sukirno, S. (2024). Redefining Indonesia's Blasphemy Law in The Digital Age: A Human Rights Perspective. *Diponegoro Law Review*, 9(1), 20. <https://doi.org/10.14710/dilrev.9.1.2024>

<sup>5</sup> Mahipal, M., Setiadi, A. N., Sasiras, A. A., Irawan, M. L., & Abdullah, N. (2024). Upaya Meningkatkan Ruang Terbuka Hijau Pada Kawasan Bogor. *Indonesian Journal of Islamic Jurisprudence, Economic and Legal Theory*, 2(4). <https://doi.org/10.62976/ijjel.v2i4.732>

occupied by people affected by disasters and/or MBR.<sup>6</sup> This is very regrettable by researchers because the construction of a Rusunawa should have paid attention to the structure of the building, the surrounding green open space, the limited public facilities to the weak enforcement of residential regulations. However, in contrast, in Singapore, which when viewed from the land area is only 735.7 km<sup>2</sup> (seven hundred thirty-five point seven square kilometers) and is not even larger than the province of Central Java which is 32,801 km<sup>2</sup> (thirty-two thousand eight hundred and one square kilometers), it can actually overcome the housing crisis better. In Singapore, to respond to the public housing crisis, an institution called the Housing and Development Board (hereinafter abbreviated as HDB) was formed to address this problem. In less than three years, HDB has built 21,000 vertical residences, and then in the next two years, it will build more vertical residences, bringing the total to 54,000 vertical residences.<sup>7</sup>

HDB has finally succeeded in overcoming the housing crisis experienced by Singapore. One of the results, which is now also a research site that will be compared with Rusunawa Pekunden, is a vertical housing complex called Skyville @ Dawson.<sup>8</sup> Skyville @ Dawson has a height of 148 meters and has 960 units of flats (hereinafter abbreviated as Sarusun) spread across three interconnected buildings. The vertical housing, built in 2019, is not only available to the public but can also be purchased by MBR (low-income earners) whose costs are subsidized by the Singapore Government.<sup>9</sup> In Indonesia, regulations regarding vertical housing are regulated by Law

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<sup>6</sup> Setyawan, Y., Erliyana, A., Makarim, E., Sjarif, F. A., Dewi, L. R., & Sukma, A. N. A. (2025). Digital Government Post-Reform in Indonesia: Normative Developments and Implementation by State Organizing Institutions. *Law Reform*, 21(1), 173. <https://doi.org/10.14710/lr.v21i1.68556>

<sup>7</sup> Housing and Development Board. (2025). HDB History and Towns. <https://www.hdb.gov.sg/cs/infoweb/about-us/history>. Accessed on 6 August 2025.

<sup>8</sup> Seng, D. T. H., & Tham, J. Housing affordability for B40 and M40 in Malaysia: financing and insights from Singapore and Indonesia. (2024). *International Journal Multidisciplinary Trends*, 6(8), 88. <https://doi.org/10.22271/multi.2024.v6.i8b.469>

<sup>9</sup> Tigris, J. O., & Sujadi, S. (2019). Perbandingan Peraturan Rumah Susun Atas Orang Asing Di Indonesia Dan Singapura Serta Dampaknya Terhadap Investasi Asing. *Jurnal Notary*, 1(1), 5. <https://download.garuda.kemdikbud.go.id/article.php?article=2983931&val=26769>

Number 20 of 2011 concerning Flats (hereinafter referred to as the Flats Law), Government Regulation Number 13 of 2021 concerning Flat Management, and Regulation of the Minister of Public Works and Public Housing (hereinafter referred to as PUPR) Number 1 of 2018. Furthermore, the Association of Flat Owners and Occupants (hereinafter referred to as PPPSRS) has been established.<sup>10</sup> However, fragmented regulations and weak coordination between agencies often result in ineffective implementation of Flats. In contrast, Singapore has a single legal framework managed solely by the HDB, resulting in more centralized and efficient regulation and implementation.

The Housing and Development Act serves as the legal basis for development, allocation, financing, and management, including occupancy regulation. This residential environmental planning can be linked to other policies such as the Town Councils Act (environmental and facility maintenance) and social integration policies like the Ethnic Integration Policy (often abbreviated as EIP). Vertical green space and “skyrise greenery” incentives are also reinforced by URA spatial planning policies such as the Landscaping for Urban Spaces and High-Rises (LUSH) program. Returning to the management of Rusunawa in Indonesia, although there is a macro framework as mentioned above, at the Rusunawa management level (in Rusunawa Pekunden it is called the Regional Technical Implementation Unit (abbreviated as UPTD)) there is no common standard measure, Standard Operational Procedures (SOPs) that are not standardized such as in the selection of residents, guidance during temporary stays in Rusunawa, supervision of unit use (transfer of rent to other people such as relatives or family without the knowledge of UPTD), handling of repeated violations that ultimately result in “moral hazard” such as residents who do not move out because the rental period is continuously extended, this will ultimately worsen and also lengthen the waiting list of

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<sup>10</sup> Puspitasari, S. A., & Taupiqqurrahman, T. (2024). QuoVadis Status Kondominium Hotel Berdasarkan Perspektif Regulasi Rumah Susun di Indonesia. *JURNAL USM LAW REVIEW*, 7(3), 1870. <https://doi.org/10.26623/julr.v7i3.10874>

MBR who are waiting to temporarily occupy Rusunawa (especially Rusunawa Pekunden which is the object of research).

Furthermore, HDB's model relies on long-term leases (99 years) with various regeneration schemes and restrictions to ensure public housing remains targeted and maintained. Meanwhile, in the Pekunden Rusunawa, the lease term is short to medium, which should allow for social mobility (as low-income residents (MBR) rise, some residents leave and are replaced by those on the waiting list). However, in practice, there is a lack of clarity, hindering the housing cycle.

Comparing the building structure and green open space between the two vertical housing units, Skyville @ Dawson's green open space not only features a garden in the front yard but also on the roof (the upper part of the vertical housing unit). This could also be implemented in the Pekunden Rusunawa, given that Article 186 of Semarang City Regulation Number 7 of 2010 stipulates that every building with a height of more than three stories (Pekunden Rusunawa has three stories, while some have four stories) is required to plant greenery on the roof and/or balcony.<sup>11</sup>

Regarding regulations, Skyville @ Dawson provides legal protection for its residents. The system stipulates that when a residential building reaches 99 years of age, all residents must move out, and the building is returned to the Singapore government for regeneration.<sup>12</sup> Skyville @ Dawson is currently only nine years old. In Indonesia, there are no regulations governing this, so aging buildings are often abandoned.

In this study, for the first study the researcher will use the Neighborhood Effect theory created by William Julius Wilson in his book entitled "The Truly Disadvantaged: The Inner City, the Underclass, and Public Policy"

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<sup>11</sup> Irawati, I., Prananingtyas, P., & Wulan, R. C. (2023). Regulation Urgency of the Misleading "greenwashing" Marketing Concept in Indonesia. *IOP Conference Series: Earth and Environmental Science*, 1270(1),3. <https://doi.org/10.1088/1755-1315/1270/1/012007>

<sup>12</sup> Tanuwidjaja, G., Bastian, E. P., Tedja, J. M., Prasetyo, I. R., & Adiasih, P. (2024). SOCIO-ECONOMIC SUSTAINABILITY ASSESSMENT OF MULTI-STOREY HOUSING: A SKYVILLE @ DAWSON SINGAPORE CASE STUDY. *Border: Jurnal Arsitektur*, 6(1), 95-118. <https://doi.org/10.33005/border.v6i1.759>

explaining that the social, physical and economic conditions of a residential environment (or in the original language called “neighborhood”) can have a significant influence on the welfare of an individual or group living in that area regardless of the characteristics of the individual or group.<sup>13</sup> While for the second study will use the theory of legal penetration, which is meant by legal penetration here is the influx of norms, institutions or policy tools from one jurisdiction to another through the mechanism of adoption, adaptation or inspiration of policies both formally (international agreements or harmonization of regulations) and informally (adoption of practices or influence of public policy). Legal penetration emphasizes the absorption of norms into local institutional practices and structures (not just imitating and implementing them normatively).<sup>14</sup> Furthermore, this research will focus on the framework of the management organs (Ministry of PUPR, Department of Housing and Settlement Areas (hereinafter referred to as Disperkim), UPTD Rusunawa Pekunden with Town Councils (HDB Estates) regarding the authority and accountability of the two management organs), as well as inclusivity and social cohesion (EIP as a proxy for desegregation compared to local inclusion policies based on vulnerability) which means comparing the Rusun Law, specifically in Article 16 paragraph (2) with the EIP from Singapore.

The research conducted by this researcher has been carried out several times before, five of which are, first, the research entitled “Inclusive Development through Providing Vertical Housing for Low Income Family in Yogyakarta Urban Areas” written by Rini Rachmawati et al, the research provides an overview of Rusunawa in Yogyakarta which is a solution from the government for settlement problems in Yogyakarta especially for people who live on the banks of the river also to overcome the problem of slum housing and bring people closer to the workplace, in addition the research

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<sup>13</sup> Wilson, W. J. (2022). *The Truly Disadvantaged: The Inner City, the Underclass, and Public Policy*. University of Chicago Press.

<sup>14</sup> Watson, A. (1993). *Legal transplants: an approach to comparative law*. University of Georgia Press.

also touches on the future Rusunawa can be built not only focusing on marginalized groups but more towards sustainable development and development.<sup>15</sup> The research has differences with the research conducted by the researcher, namely the focus of the research where the research focuses on providing information and an overview of Rusunawa for the community while the focus of the researcher's research is to review regulations and programs from Singapore related to Rusunawa, especially HDB and EIP to then be penetrated in Indonesia, in addition the object of the research is limited to Rusunawa in the city of Yogyakarta, while the object of the research taken by the researcher is Rusunawa Pekunden as the target of penetration and Singapore's regulations from the HDB institution and the EIP program. Furthermore, the similarity of the research with the research conducted by the researcher is focusing on the development of inclusivity in Rusunawa so that there is no stigma against Rusunawa residents (especially Rusunawa Pekunden). Second, the study entitled "Housing Policies in Greater China and Singapore" by Yang Zhang et al, the study examines the effectiveness of public housing policies which based on their research are greatly influenced by market structure and policy implementation. Singapore managed to stabilize prices despite using strict policies while Greater China was unable to do so.<sup>16</sup> The difference between the research and the research conducted by the author is the focus of the research, the research focuses on the impact of macroprudential policies such as prices and government intervention, while the author's research focuses on the penetration of policies and regulations from Singapore, the research also uses a comparative method of evaluating prices and policies, while the research conducted by the researcher focuses more on policy and

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<sup>15</sup> Rachmawati, R., Budiarti, C. V., Febrita, D., & Sulistyani, E. (2017). Inclusive Development through Providing Vertical Housing for Low Income Family in Yogyakarta Urban Areas. In *Forum Geografi* (Vol. 31, No. 2, pp. 246-257). <https://doi.org/10.23917/forgeo.v31i2.5132>

<sup>16</sup> Zhang, Y., Zhang, Q., & Zheng, H. (2020). Housing policies in greater China and Singapore. *Economic and Political Studies*, 8(1), 41-64. <https://doi.org/10.1080/20954816.2019.1691797>

institutional analysis of Rusunawa Pekunden and the models found in Singapore, while the similarities between the research and the research conducted by the researcher lie in the analysis method, namely comparing two countries to evaluate the target or object of research.

Third, a study entitled “Public Housing Saving Program: A Comparative Legal Analysis between Indonesia and Singapore” conducted by Sheila Adi Nurmali and Ikawati Utami, the study examines housing policies in each country designed according to socio-economic conditions and community needs, as seen in Singapore which relies on the role of HDB in providing affordable housing through comprehensive regulations and renewal programs. Meanwhile, Indonesia through the People’s Housing Savings (Tapera) seeks to meet housing needs, but its implementation still faces challenges in the form of low participation, financial burdens for low-income communities, as well as issues of transparency and accountability in fund management,<sup>17</sup> the difference between the study and the research conducted by the researcher is that the researcher analyzes the issue of managing Rusunawa Pekunden in Semarang City with the management of Skyville @ Dawson in Singapore while the study discusses Tapera, while the similarities between the study and the research to be written by the researcher have similarities in comparative studies between Indonesia and Singapore and use normative research methods; Fourth, a study entitled “Comparative Study of Urban Green Open Space Planning between Jakarta and Singapore” conducted by Retno Setiowati et al., the study examines the planning of green open space in Jakarta showing a downward trend since 1965 due to land conversion and the absence of regulations that legally regulate the Green Open Space Masterplan, plus the absence of an official baseline for the area of green open space, so that even though land acquisition and green open space development are carried out, the area continues to decrease every year. In contrast to Jakarta, Singapore

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<sup>17</sup> Nurmala, S. A., & Utami, I. (2024). Public Housing Saving Program: A Comparative Legal Analysis between Indonesia and Singapore. *Indonesian Comparative Law Review*, 7(1), 1-13. <https://doi.org/10.18196/iclr.v7i1.23636>

succeeded in increasing the area of green open space by 47% in 2011 through a strong political vision, Masterplan-based planning, and effective collaboration between stakeholders that encourage public awareness of greening,<sup>18</sup> the difference between the study and the research conducted by the researcher is that the study limits its study to green open space only, while the research conducted by the researcher will compare aspects of Rusunawa management more broadly. In addition, the study compares Singapore with Jakarta, while the researcher compares Semarang City with Singapore, while the similarity between the study and the research conducted by the researcher is comparing the management of green open space between Indonesia and Singapore.

Fifth, a study entitled “Status of Ownership of Apartment Units by Foreigners (Comparative Study of Positive Laws of Indonesia and Singapore)” conducted by Elsy Suci Rahmadani and Ricki Musliadi, the study examines the regulations on ownership of apartment units for foreign citizens in Indonesia which are still restrictive with restrictions on the number of units, housing classification, and conditions for contribution to national development, while Singapore applies a more flexible policy with the regulation of “restricted” and “non-restricted” property categories as well as a clear licensing mechanism to encourage foreign investment. The difference in regulatory flexibility reflects the policy orientations of the two countries. Indonesia emphasizes protecting national interests, while Singapore prioritizes open property markets with structured administrative controls.<sup>19</sup> The difference between this study and the researcher’s research lies in their focus. The focus of this study was on apartment ownership by foreign nationals, while the research to be written by the researcher focuses on apartment management policies and the role of the government in

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<sup>18</sup> Setiowati, R., Hasibuan, H. S., & Koestoer, R. H. T. (2020). Studi komparasi perencanaan ruang terbuka hijau perkotaan antara Jakarta dan Singapura. *Jurnal Lanskap Indonesia*, 12(2), 54-62. <https://doi.org/10.29244/jli.v12i2.32409>

<sup>19</sup> Rahmadani, E. S., & Musliadi, R. (2024). Status Kepemilikan Satuan Rumah Susun Oleh Orang Asing (Studi Perbandingan Hukum Positif Indonesia dan Singapura). *Jurnal Hukum Respublica*, 23(02), 53-64. <https://doi.org/10.31849/respublica.v23i02.20187>

regulation and management. The similarities between this study and the researcher's research lie in their shared object of study: apartments and apartment regulations in Indonesia and Singapore.

## Methods

The research approach used in this study is a qualitative one. This approach allows researchers to obtain information and explore it more deeply regarding policy or regulatory issues regarding low-cost apartments, which are still fraught with weaknesses. Furthermore, qualitative research is used because researchers want to analyze a phenomenon that cannot be quantified and is descriptive in nature.<sup>20</sup> Qualitative research can also show how life in a society, behavior, history, social movements, organizational functionality, and kinship relationships are like. Furthermore, according to John W. Creswell in his book "Mixed Method Research: Introduction and Application," qualitative research is a process of investigating an understanding based on separate methodological traditions that explore a social or human problem. Qualitative researchers construct something complex, examining words and holistic images, conducting studies in natural settings, and examining reports that detail the views of native speakers. This indicates that qualitative research is used to uncover specific social conditions by describing reality in real terms using sentences obtained from relevant data collection and analysis techniques rather than a natural situation.<sup>21</sup> The research referred to in this context is on natural objects, meaning that the object develops naturally without any manipulation by the researcher and the presence of the researcher will not affect the dynamics of the object. Qualitative research is conducted by exploring and deepening a social phenomenon consisting of actors, events,

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<sup>20</sup> Ramdhan, M. (2021). *Metode penelitian*. Surabaya: Cipta Media Nusantara.

<sup>21</sup> Creswell, J. W. (1999). *Mixed-method research: Introduction and application*. In *Handbook of educational policy*. Lincoln: Academic Press.

places and times. The phenomenon is then described in such a way that when conducting qualitative research, basic questions will arise such as what and how the event occurred; who was involved in the event; when the event occurred; and where the event occurred.<sup>22</sup> In addition, the research design used in this study is a qualitative descriptive design. Research with a qualitative descriptive format aims to describe various conditions, situations or phenomena of social reality that exist in society (the object of research) and attempts to bring this reality to the surface as a characteristic, nature, character, model, description of a particular condition, situation or phenomenon.<sup>23</sup> This format is used because it is appropriate for analyzing problems of public policy implementation in a society.

Then the type of research approach here uses a literature study with a statute approach to examine laws and regulations that are relevant to public flats or Rusunawa both in Indonesia and in Singapore which will be the focus of this research, a comparative approach will be used to compare and examine apartment regulations between Indonesia and Singapore and to apply Singaporean regulations to Indonesia. Conceptual approach, The conceptual approach will be used to examine and analyze a concept that will be used to implement and develop the implementation of apartments based on the literature study obtained during the research. Then the Analytical Approach will be used to analyze legal materials both primary legal materials, secondary legal materials, and tertiary legal materials obtained during the research and the results of the analysis will be used as an analytical instrument to compile and develop policies related to apartments. The data collection method in this research is by literature study. Literature studies in this case come from documents, documents function as tools to

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<sup>22</sup> Ghony, M. D., & Almanshur, F. (2012). *Metodologi Penelitian Kualitatif*. Yogyakarta: Ar-Ruzz Media.

<sup>23</sup> Doyle, L., McCabe, C., Keogh, B., Brady, A., & McCann, M. (2020). An overview of the qualitative descriptive design with innursing research. *Journal of research in nursing*, 25(5), 446. <https://doi.org/10.1177/1744987119880234>

test, interpret and sometimes function to predict a particular situation.<sup>24</sup>

## Result and Discussion

### 1. Study of the Penetration of the Ethnic Integration Policy of the House Development Board in Singapore on the Regulation of Apartments in Indonesia

Flats (Rusun) are a type of residential infrastructure with various uses, including residences, temporary or rental accommodation, disaster evacuation centers, and other functions.<sup>25</sup> One function of flats is to provide housing for the poor, defined in legislation as Low-Income Communities (MBR). Each country has its own regulations regarding the establishment and operation of flats, some of which will be reviewed, including Indonesia and Singapore. As a primary introduction to this comparative study of flat regulations in these two countries, a review of their regulations is necessary.

Indonesia's primary regulation for flats is outlined in Law No. 20 of 2011, also known as the Flats Law. This law addresses types of flats, their construction, their management, and much more. This Flats Law has also been updated with Law No. 20 of 2011 concerning Flats, as amended by Article 51 of Law No. 6 of 2023 concerning Job Creation (Ciptaker Law). One of the studies in this research that will be studied in depth is the study of public flats or what in each regional regulation is called Rusunawa. The philosophical basis for the formation of public flats can be reviewed from the body of the 1945 Constitution of the Republic of Indonesia (UUD NRI 1945) which states that people have the right to obtain welfare and have a

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<sup>24</sup> Moleong, Lexy J. 2019. *Metodologi Penelitian Kualitatif*. PT Remaja Rosdakarya Bandung.

<sup>25</sup> Manaf, A., Ginting, L. P., & Irwansyah, M. (2023, November). The Relevance of Vertical Housing to the Socio-Economic Characteristics of Occupants in Semarang City, Indonesia: Particularly the Proximity of Public Facility Aspects. In *IOP Conference Series: Earth and Environmental Science* (Vol. 1264, No. 1, p. 012042). IOP Publishing. [10.1088/1755-1315/1264/1/012042](https://doi.org/10.1088/1755-1315/1264/1/012042)

place to live. This is stated in Article 28H of the 1945 Constitution which reads as follows: “Everyone has the right to live in physical and spiritual prosperity, to have a place to live, and to have a good and healthy living environment and has the right to receive health services.” From this article, it can be seen that the state is obliged to provide facilities to the community to obtain welfare, one way is to provide decent housing.

The state’s obligation to provide adequate housing is also stipulated in Article 86 of the Apartment Law, which states that “The government shall provide assistance and facilities for the construction, occupancy, control, ownership, and utilization of apartments for low-income families (MBR). Article 1, number 14, affirms that low-income families (MBR) are entitled to public apartments, stating that they are people with limited purchasing power and therefore require government support to obtain public apartments. The derivative regulations of the Apartment Law are Government Regulation (PP), namely PP No. 4 of 1998, which has now been updated with PP No. 13 of 2021. This PP broadly regulates the implementation of apartment buildings, including the technical implementation of apartment construction, management and utilization, and other matters related to the technical implementation of apartment buildings. Further derivative regulations are regulated in Regional Regulations (Perda) and other regulations according to each region.

This research focuses on one of the apartment buildings in Semarang City, the Pekunden Apartment. Pekunden Rusunawa was chosen as the object of this research because it is located in the middle of a big city and is a center for residents from various regions both within the city and outside Semarang City. Regulations regarding Pekunden Rusunawa are subject to regional regulations, namely Semarang City Mayor Regulation No. 7 of 2009. The Semarang City Mayor Regulation contains the governance, licensing, residence period of Rusunawa in Semarang City and also regulates the rights and obligations of Rusunawa residents in residing in Rusunawa.

The implementation of the Rusun (low-income) housing program in Semarang City currently lacks any program and is limited to the standards stipulated in the laws and regulations governing Rusunawa (low-income) housing, and lacks a sociological study of the social realities within the Pekunden Rusunawa. This indicates that the government is not paying sufficient attention to the implementation of the Rusunawa for low-income residents. These low-income residents are simply left in limbo without any clear direction or goal of improving their lives and employment. The government should at least have a strategy, policy, or program to motivate low-income residents to improve their lifestyles and continuously monitor the residents of the Pekunden Rusunawa. This contrasts with the Rusunawa or low-income housing program in Singapore.

Singapore is a country known for its progress in many areas within a relatively small area. This is a unique thing for Singapore considering that it is not easy for a country to utilize existing resources with a very narrow area, but it can still make its country very systematic and become a developed country in many sectors, including the housing and settlement sector.<sup>26</sup> In the housing and settlement sector, Singapore also formed an agency or institution called the House Development Board (HDB), and this institution is given a mandate in accordance with statutory regulations to compile or form housing programs in various forms and one of them is Rusun or in foreign languages called flats.

Singapore shares similarities with Indonesia in that, at the legal level, Singapore also has primary regulations in the housing sector as the basis for the HDB's independence in formulating its own settlement policies. This is stipulated in the Statutes of the Republic of Singapore Housing and Development Act 1959.<sup>27</sup> These regulations detail the duties, functions,

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<sup>26</sup> Wijayanti, S. N., ALW, L. T., Lailam, T., & Iswandi, K. (2025). Progressive Legal Approaches of the Constitutional Justice Reasoning on Judicial Review Cases: Challenges or Opportunities?. *Law Reform*, 21(2), 219. <https://doi.org/10.14710/Lr.v21i2.66334>

<sup>27</sup> Wang, R. (2024). Comparative Study on China's Public Rental Housing System and Singapore's HDB System. *Advances in Economics, Management and Political Sciences*, 143, 116. <https://direct.ewa.pub/proceedings/aemps/article/view/18936>

institutional structure, and authorities of the HDB as Singapore's housing agency. In practice, Singapore boasts numerous apartments and/or low-cost apartments, one of which is the Skyville @ Dawson Singapore Flats, located on Dawson Road, Singapore. Skyville @ Dawson is a low-cost apartment building that historically took approximately eight years to construct. The Skyville @ Dawson Flats or apartments have 47 floors, and the units in the Skyville Flats are equivalent to 960 homes, constructed in four layers across three interconnected blocks.<sup>28</sup>

The background of the establishment of Skyville @ Dawson Flats is a development that carries the principal values of community, variety, and sustainability, where currently there are at least 3,000 families living there.<sup>29</sup> The Singapore government's policy, in this case HDB, in relation to Flats is to provide subsidy assistance in the form of a number of funds to MBRs who are Singaporean citizens. Assistance or subsidies from the data also vary, but here the study will not focus on providing subsidies but on one of the programs provided by the Singapore government, in this case the Ethnic Integration Policy (EIP). EIP is a program from HDB to unite several ethnic citizens regardless of the economic conditions of ethnicity, race, and various other things.

The primary intention of the EIP program is to separate or eliminate social segregation or levels of social stratification by not separating the poor from the rich or people of different ethnicities. This concept or program began in 1989, when Singapore implemented ethnic quotas for each apartment, with approximately 84% Chinese, approximately 22% Malay, and 12% Indian or other ethnicities. Since 2010, minority quotas have continued to increase, with the Indian quota rising to 15%.<sup>30</sup> This

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<sup>28</sup> Samant, S., & Hsi-En, N. (2017). A Tale of two singapore sky gardens. *CTBUH Journal*, 3, 28. [https://global.ctbuh.org/resources/papers/3374-Journal2017\\_IssueIII\\_Samant](https://global.ctbuh.org/resources/papers/3374-Journal2017_IssueIII_Samant)

<sup>29</sup> Stack Property. (2025). About Skyville @ Dawson (Queenstown). <https://stackproperty.sg/hdb/projects/skyville-@-dawson>. Accessed on 30 August 2025.

<sup>30</sup> Yustiarini, D., Soemardi, B. W., & Pribadi, K. S. (2025). Integrating multi-stakeholder governance, engineering approaches, and bibliometric literature review insights forsustainable regional road maintenance: Contribution to sustainable development goals

percentage is not without reason, as according to the Singapore Statistics Agency, the population in Singapore is almost 80% Chinese, with the remainder being people of other ethnicities.<sup>31</sup>

The main concept of the EIP Flats in Singapore may at first glance have little implication, but this is what makes the driving element or motivation of the residents of the Flat units in Singapore, especially the Skyville @ Dawson Flats. If reviewed from the existing facts, this EIP has a positive influence on the residents of the Flat units in Skyville @ Dawson, this can be proven in research by Shin Bin Tan who has tested the effectiveness of the implementation of the EIP program by HDB. The results of the research written by Tan are that with the EIP program the level of ethnic and socio-economic segregation is lower than in private Flats that are not limited by the EIP quota. With the results of this research, it can be concluded that between the capable or rich and the poor have the same opportunities in everything.<sup>32</sup> Referring to this fact, HDB creates a more socio-economically equatable Flat environment by encouraging more equal interaction and opportunities between residents from different racial and economic classes.

A program with the same intent as the EIP does not exist in Indonesia. In Indonesia itself, there is actually a regulation regarding the obligation to provide 20% of the total floor area of commercial apartments as public apartments or apartments for low-income people (MBR), this is stated in Article 16 paragraph (2) of the Apartment Law. However, what contradicts this article is the existence of Article 16 paragraphs (3), (4), and (5) of Law No. 20 of 2011 concerning Apartments, as amended by Article 51 of the Job Creation Law. The Job Creation Law states that the implementation of the construction of public apartments amounting to 20% can be carried out in

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(SDGs) 9, 11, and 16. Indonesian Journal of Science and Technology, 10(2), 368. <https://doi.org/10.17509/ijost.v10i2.85038>

<sup>31</sup> Singapore Government Agency. (2025). HDB Ethnic Integration Policy (1989). <https://www.sg101.gov.sg/social-national-identity/examples/hdb/>. Accessed on 30 August 2025.

<sup>32</sup> Tan, S. B. (2022). Do ethnic integration policies also improve socio-economic integration? A study of residential segregation in Singapore. *Urban Studies*, 60(4), 715. <https://doi.org/10.1177/00420980221117918>

other locations but still within the same city. The implementation of the obligation to build 20% of the apartment can also be converted into funds for the construction of public apartments, the management of which is handed over to the Housing Acceleration Agency. Considering the absence of further regulations in the form of Government Regulations or other derivative regulations, the implementation of the 20% construction of public apartments is ineffective and poorly implemented.<sup>33</sup> With this in mind, in this study the researcher provides a solution that the government has an obligation to unite the poor and the rich by requiring 20% of development to be carried out in the same location, because with this it will have similar implications to what happened in the Skyville @ Dawson Flats in Singapore where the Flats will create an equitable environment both socially and economically by encouraging more equal interaction and probability between residents from different racial and economic classes.<sup>34</sup> With this, a positive output will be obtained where MBR will get motivation and a better environment with a large number of capable people and of course this also opens up the probability for MBR to establish relationships with capable people, so that it is hoped that with this policy there will be a positive stigma and a positive environment that will also increase the enthusiasm of MBR to continue to improve themselves.<sup>35</sup>

Analysis and study on the suggestion that the government should establish regulations to create a unification for MBR and the above-mentioned community so that MBR has the passion or motivation to improve themselves because of their environment has also been studied in

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<sup>33</sup> Lumingkewas, C. S. (2016). Analisis Yuridis Pemaknaan Konsep Dalam Pasal 16 Undang-Undang Rumah Susun Bagi Masyarakat Berpenghasilan Rendah. *Arena Hukum*, 9(3), 429. <https://doi.org/10.21776/ub.arenahukum.2016.00903.7>

<sup>34</sup> Leuwol, F. S., Yusuf, R., Wahyudi, E., & Jamin, N. S. (2023). Pengaruh kualitas lingkungan terhadap kesejahteraan psikologis individu di Kota Metropolitan. *Jurnal MultidisiplinWestScience*, 2(08), 718. <https://doi.org/10.58812/jmws.v2i08.592>

<sup>35</sup> Yuliasuti, N., Sukmawati, A. M. A., & Purwoningsih, P. (2018). Utilization of social facilities tore in force social interaction in formal housing. *Archnet-IJAR: International Journal of Architectural Research*, 12(1), 147. <https://doi.org/10.26687/archnet-ijar.v12i1.1295>

the Neighborhood Effect Theory by William Julius Wilson.<sup>36</sup> This Neighborhood Effect Theory states that environmental conditions, infrastructure, socio-economic, social relations, and public facilities influence the behavior, individuals, and life opportunities of an individual.<sup>37</sup>

## **2. Penetration of Singapore's State-Owned Apartment Regulations in the House and Development Board Study in Indonesia**

Flats (Rusun) are a type of residential infrastructure with various uses, including residences, temporary or rental accommodation, disaster evacuation centers, and other functions.<sup>38</sup> One function of flats is to provide housing for the poor, defined in legislation as Low-Income Communities (MBR). Each country has its own regulations regarding the establishment and operation of flats, some of which will be reviewed, including Indonesia and Singapore. As a primary introduction to this comparative study of flat regulations in these two countries, a review of their regulations is necessary.

Administratively, Rusun in Indonesia begins at the central level, specifically starting with the Ministry of Public Works and Public Housing (PUPR), which issues a legal framework and technical standards such as the Rusun Law and Government Regulation Number 13/2021, as well as establishing implementation guidelines and program priorities that serve as a reference for funding and implementation in the regions. PUPR plays a role in determining strategies such as determining the type of Rusun that

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<sup>36</sup> Saputra, E. E., & Parisu, C. Z. L. (2025). The Role Of Social Psychology In Individual Cognitive And Social Development. *Journal of Humanities, Social Sciences, and Education*, 1(1), 50. <https://doi.org/10.64690/jhuse.v1i1.23>

<sup>37</sup> Nicklett, E. J., Lohman, M. C., & Smith, M. L. (2017). Neighborhood environment and falls among community-dwelling older adults. *International journal of environmental research and public health*, 14(2), 175. <https://doi.org/10.3390/ijerph14020175>

<sup>38</sup> Manaf, A., Ginting, L. P., & Irwansyah, M. (2023, November). The Relevance of Vertical Housing to the Socio-Economic Characteristics of Occupants in Semarang City, Indonesia: Particularly the Proximity of Public Facility Aspects. In *IOP Conference Series: Earth and Environmental Science* (Vol. 1264, No. 1, p. 012042). IOP Publishing. 10.1088/1755-1315/1264/1/012042

may be built (Rusunawa or simple owned flats), assistance mechanisms for MBR and technical requirements that must be met by implementers/managers. At this level, PUPR is limited to policy making, for the implementation and effectiveness of the implementation of policies made by PUPR depends on regional apparatus that translates and allocates resources to implement the policy. Then at the regional level, Disperkim acts as a translator of PUPR policies into local work plans, proposes the Regional Revenue and Expenditure Budget (APBD), determines locations and supervises the implementation of construction contracts. Disperkim at the regional level is also tasked with identifying backlog needs, planning relocations, preparing land use schemes and formulating regional regulations that regulate occupant selection and local governance. However, if examined more deeply, these tasks actually overlap with the Regional Development Planning Agency (Bappeda) which is tasked with determining priorities and budgets as well as the land agency, resulting in weak coordination between Disperkim and Bappeda and the land agency.<sup>39</sup> Disperkim ultimately only focuses on short-term solutions, to address backlogs or emergency relocations without financial planning that ensures long-term maintenance quality.<sup>40</sup> Finally, the Rusunawa Technical Implementation Unit (UPTD) functions as an operational manager, managing rental administration, conducting prospective tenant selection, rent collection, handling violations, providing complaint centers, providing daily maintenance, and providing social guidance. The UPTD is hierarchically subordinate to the Department of Housing and Settlements (Disperkim) and is responsible for reporting operational performance to the Department. However, in reality, rental income is channeled to the regional treasury and not used for Rusunawa maintenance. Maintenance of the

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<sup>39</sup> Wicaksono, I., & Diamantina, A. (2019). Implementation of Attributive and Delegative Authority of Sub District Head in the Local Government Procedures. *Jurnal Hukum Novelty*, 10(2), 179. <https://doi.org/10.26555/novelty.v10i2.a13782>

<sup>40</sup> Mahulae, B. P., & Sunarti, S. (2021). Optimalisasi pengelolaan rusunawa di Kota Semarang. *Jurnal Pengembangan Kota*, 9(2), 245-258. <https://doi.org/10.14710/jpk.9.2.245-258>

Rusunawa itself must still rely on the Regional Budget (APBD). SOPs that do not have the same standard measurements between one UPTD and another, and limited personnel, result in the UPTD being unable to function optimally.

The inability of the Regional Technical Implementation Unit (UPTD) to implement preventive maintenance and administrative enforcement for Rusunawa residents has resulted in a maintenance backlog, illegal lease transfers, and persistent waiting lists. This situation indicates the weak sustainability of Rusunawa housing for low-income residents.<sup>41</sup>

Further analysis reveals that the policy of relocating residents to Rusunawa does reduce disaster risk for these communities, but it also increases livelihood vulnerability if not balanced with empowerment programs and alternative social networks. Research by Yokoyama et al. Found that without attention to social support, livelihoods, and access to services, relocation to Rusunawa can weaken household economic well-being, even though it fulfills the goals of protecting and providing housing for low-income residents.<sup>42</sup>

Since the establishment of the HDB following Singapore's independence, the institution has been established as a centralized public institution with broad and comprehensive duties and mandates, ranging from land acquisition, vertical housing development, urban planning, unit allocation, financing, and regeneration and development programs to maintain the quality of the housing stock in the long term. This centralized institutional model provides space for Singapore to manage housing supply

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<sup>41</sup> Safitri, A. F. D., & Agustina, I. F. (2022). Determining Factors in the Rusunawa Policy as a Liveable House for Low-Income Communities: Faktor Penentu Dalam Kebijakan Rusunawa Sebagai Rumah Tinggal Layak Huni Bagi Masyarakat Berpenghasilan Rendah. *Indonesian Journal of Public Policy Review*, 19, 10-21070. <https://doi.org/10.21070/ijppr.v19i0.1242>

<sup>42</sup> Yokoyama, A., Matsuyuki, M., Antokida, Y., Fitrinitia, I. S., Tanaka, S., & Ariyoshi, R. (2023). Assessing the impacts of climate-induced resettlement on livelihood vulnerability: A case study in Jakarta Special Province, Indonesia. *International Journal of Disaster Risk Reduction*, 96, 103946. <https://doi.org/10.1016/j.ijdrr.2023.103946>

and demand with its policies while also implementing EIPs to maintain ethnic cohesion and simultaneously prevent spatial segregation. The institutional structure between the HDB and the management of Rusun in Indonesia is actually fundamentally different. In Indonesia, regulations related to public housing and Rusun are spread across many legal instruments and actors as explained above, starting from laws, to regional regulations and UPTDs for each Rusunawa, which ultimately results in overlapping authorities, inconsistencies in SOPs because each region uses its own Perda and is vulnerable to inter-agency problems. Historically, the development of public housing institutions in Indonesia demonstrates that policies and institutional structures are shaped by historical decisions that complicate cross-sectoral change, thus slowing reform. Consequently, central government policies are difficult to translate to the regional level, and there is a lack of regulatory harmonization across regions, leading to diverse operational practices.<sup>43</sup>

From a financing perspective, the Singaporean system utilizes integration between housing policy and national savings instruments or financing providers (subsidy mechanisms), enabling long-term and sustainable access to housing ownership and maintenance. In Indonesia, the People's Housing Savings (Tapera) program, designed to address the issue of sustainable financing, offers a mandatory contribution scheme managed by a dedicated agency. However, challenges such as the transparency of fund management remain. This highlights a gap between the design of financing policies at the national level and the capacity for policy implementation on the ground.<sup>44</sup>

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<sup>43</sup> Vitriana, A., Özogul, S., Mawhorter, S., & Woltjer, J. (2025). The Historical Development of Public Housing in Indonesia: A Path Dependence Analysis. *International Journal of Housing Policy*, 1-24. <https://doi.org/10.1080/19491247.2025.2482233>

<sup>44</sup> Putra, H. G., Fahmi, E., & Taruc, K. (2019). Tabungan Perumahan Rakyat (TAPERA) dan Penerapannya di DKI Jakarta. *Jurnal Muara Sains, Teknologi, Kedokteran Dan Ilmu Kesehatan*, 3(2), 321-332. <https://doi.org/10.24912/jmstkik.v3i2.5630>

Leasehold allocation and regeneration mechanisms, such as planned development schemes, renovation programs, and rental and lease expiration regulations, provide room for Singapore to regenerate buildings when they become obsolete, as outlined in the background, ensuring the housing stock remains well-maintained and relevant over time.<sup>45</sup> In the context of the Pekunden Rusunawa, tenure is short, with weak rental monitoring mechanisms and no legal regeneration mechanism. This combination creates obstacles such as long waiting lists due to existing residents whose leases are extended indefinitely (for no apparent reason, with no maximum limit) or the transfer of lease rights to other residents without the knowledge of the UPTD (Regional Government Unit). This results in the low effectiveness of Rusunawa as a temporary solution to the problem of temporary housing for low-income residents.<sup>46</sup> Based on the aspects of spatial design and environmental sustainability, Skyville @ Dawson (apartment in Singapore) displays the practice of incorporating green space on the roof and community facilities integrated into the vertical residential design, this marks a practice that improves the quality of life of residents, provides long-term value, and strengthens the function of green space.<sup>47</sup> This design is relevant for Rusunawa (the obligation to plant greenery on the roof of the building and/or balcony for every building with three floors or more). However, in its implementation, there is no maintenance and incentives from the UPTD to the residents of Rusunawa Pekunden for those who have fulfilled the green space obligation. This

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<sup>45</sup> Mayana, R. F., Santika, T., Win, Y. Y., Matalam, J. A. K., & Ramli, A. M. (2024). Legal Issues of Artificial Intelligence–Generated Works: Challenges on Indonesian Copyright Law. *Law Reform*, 20(1), 70. <https://doi.org/10.14710/Lr.v20i1.61262>

<sup>46</sup> Vitriana, A., Özogul, S., Mawhorter, S., & Woltjer, J. (2025). The Historical Development of Public Housing in Indonesia: A Path Dependence Analysis. *International Journal of Housing Policy*, 1-24. <https://doi.org/10.1080/19491247.2025.2482233>

<sup>47</sup> Solihah, P. A., Kaniawati, I., Samsudin, A., & Riandi, R. (2024). Prototype of greenhouse effect for improving problem-solving skills in science, technology, engineering, and mathematics (STEM)-education for sustainable development (ESD): Literature review, bibliometric, and experiment. *Indonesian Journal of Science and Technology*, 9(1), 164. <https://doi.org/10.17509/ijost.v9i1.66773>

results in the green function being very short and as if it only functions as an aesthetic feature that is quickly damaged.

**Picture 1. Damaged plants in the Pekunden Rusunawa due to poor maintenance**



Source: Photo taken at the Pekunden Rusunawa by author.

Based on these factors, HDB clearly stands out due to its mutually reinforcing institutional integration, financing instruments, and social policies. Indonesia, on the other hand, has a legal framework and instruments, but is hampered by institutional fragmentation, public trust issues, and limited operational and regeneration mechanisms at the UPTD level.

HDB's penetration in Indonesia is effective due to the integration of land policies, allocation, financing, and urban planning within a single, connected institution. This relationship lowers transaction costs, ensures stock renewal, and facilitates subsidy targeting. In Singapore, a concept known as "interlocking design" creates stable supply and long-term access for the public.<sup>48</sup> Conceptually, Tapera could be a financing component that aligns with the function of the Central Provident Fund, namely accumulating long-term savings that can be allocated to finance subsidized housing. However, Tapera still needs to improve public perception

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<sup>48</sup> Chia, W. M., Li, M., & Tang, Y. (2017). Public and private housing markets dynamics in Singapore: The role of fundamentals. *Journal of Housing Economics*, 36, 44-61. <https://doi.org/10.1016/j.jhe.2017.03.001>

regarding mandatory contributions, the need for investment transparency, and a clear allocation mechanism between savings and production or output from those savings.<sup>49</sup> To carry out the penetration of the HDB principles, Tapera must undergo a governance deformation so that the fund allocation mechanism is directed to housing projects for MBR (both subsidized housing and vertical housing in the form of Rusunawa).<sup>50</sup>

An alternative step, besides demanding the establishment of a single body with the same function as the HDB, is legal penetration. This could be achieved by establishing a city housing coordination unit (either at the central or city/district level) as a cross-regional institution (which can be established through a regional regulation) tasked with managing waiting lists electronically, establishing standard operating procedures for apartment management in all regions, and receiving Tapera funds for local projects.<sup>51</sup> Furthermore, the function of “Town Councils,” similar to those in Singapore, should be strengthened by providing local authority and funding sources for housing communities, for example, through the collection and auditing of apartment maintenance fees.<sup>52</sup> This localized version of the Town Council should consist of at least representatives from apartment residents, city/district governments, and technical implementation units (UPTD) to provide a clear channel for addressing issues or simply meeting monthly.

For HDB penetration to succeed, as described above, the allocation and lease term regulations need to be reformulated into three components:

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<sup>49</sup> Chia, W. M., Li, M., & Tang, Y. (2017). Public and private housing markets dynamics in Singapore: The role of fundamentals. *Journal of Housing Economics*, 36, 44-61. <https://doi.org/10.1016/j.jhe.2017.03.001>

<sup>50</sup> Nasution, T. A. (2021). Analisis Yuridis Undang-Undang Tabungan Perumahan Rakyat Ditinjau Dari Perspektif Good Governance. *Lex Renaissance*, 6(4), 833-846. <https://doi.org/10.20885/JLR.vol6.iss4.art13>

<sup>51</sup> Irawan, B., Mulyanti, D., Budiawan, H., Rahman, Y. M., & Taufiqurrohman, A. (2025). Perspective of State Sovereignty in Law Enforcement Related to Cyberlaw Jurisdiction. *Law Reform*, 20(1), 120. <https://doi.org/10.14710/Lr.v21i1.68760>

<sup>52</sup> Irawan, B., Mulyanti, D., Budiawan, H., Rahman, Y. M., & Taufiqurrohman, A. (2025). Perspective of State Sovereignty in Law Enforcement Related to Cyberlaw Jurisdiction. *Law Reform*, 20(1), 120. <https://doi.org/10.14710/Lr.v21i1.68760>

### 1) Eligibility criteria

Eligibility here must be based on vulnerability or income so that the target residents are truly MBR (for prospective residents who are included in the MBR group), the criteria must be verified and validated but not through various parties (just two parties are sufficient, for example the UPTD and the Financial Services Authority or the Central Statistics Agency);

### 2) Lease term and penalties

The rental period must have a clear time limit (currently in Rusunawa Pekunden (also Rusunawa in Semarang city) the period is 2 years which can be extended for acceptable reasons without a maximum extension limit as regulated in Article 5 paragraph (2) of Mayoral Regulation No. 7 of 2009), illegal transfer of lease must be subject to strict and effective sanctions (sanctions can be in the form of temporary termination of rights, fines or cancellation of extensions); and

### 3) Stock regeneration

There must be rules that set a threshold for a Flat when renovations must be carried out (such as the age of the building or the damage index) as well as funding for demolition and reconstruction.

## Conclusion

The analysis concludes that the Indonesian apartment policy, despite being regulated by Law No. 20 of 2011 and its various derivative regulations, still faces fundamental issues such as fragmented authority, weak social integration, and suboptimal building stock management and regeneration mechanisms, thus ineffectively addressing the housing backlog and the needs of low-income families (MBR). Conversely, Singapore, through the HDB, demonstrates a centralized governance model with consistent legal

instruments, such as the Housing and Development Act and the EIP, which have successfully created decent, sustainable, and inclusive housing. Analysis of legal penetration and the Neighborhood Effect theory shows that the quality of the socio-economic environment, infrastructure, and the integration of housing policies significantly influence community welfare. Therefore, the penetration of HDB principles and the contextual application of the EIP concept in Indonesia, accompanied by the establishment of an integrated management institution, social justice-based urban planning, and the strengthening of financing instruments such as Tapera, can be a strategic step in improving national apartment policy and management to be more effective and equitable.

The researchers' recommendations based on the results of this study include the need for the Indonesian government to strengthen institutions and harmonize regulations for condominiums (rusun) by establishing a professional, centralized management agency to ensure more effective inter-agency coordination and integrated housing policy implementation. Singapore's experience with the EIP can serve as a reference for promoting socio-economic diversity in condominium environments, thereby creating social cohesion and reducing segregation. Furthermore, policies to regenerate the condominium building stock with improved construction standards, environmentally friendly housing, and green open spaces should be prioritized to support the quality of life of residents.

Optimizing financing mechanisms through the Tapera Management Agency and other financial instruments must also be accompanied by accountability and transparency to ensure the sustainability of condominium development for low-income families (MBR). Community participation and education of condominium residents are also crucial to foster a culture of compliance, shared responsibility, and a sense of ownership in shared housing. With these steps, national condominium management can become more effective, equitable, and able to meet the challenges of future housing needs.

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