

Implementation of Regional Regulation on Market Management in the Regulation of Morning Market Traders in Relation to Traffic Congestion in the Projo Ambarawa Market Area

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Abstract

Traffic congestion in the Projo Ambarawa Market area demonstrates that traffic problems within commercial areas are not solely associated with the increase in vehicle volume, but also with the governance of economic activities and the utilization of road space. This study aims to analyze the implementation of Regional Regulation of Semarang Regency Number 9 of 2024 concerning the Establishment, Arrangement, and Development of People's Markets in the regulation of Morning Market traders, as well as to assess its effectiveness in relation to traffic congestion in the market area. This research employs an empirical juridical approach by examining normative provisions and their implementation through interviews, field observations, and analysis of relevant legal materials. The findings indicate that the Regional Regulation has been administratively implemented for traders operating within the market area through mechanisms of trader identification, limitation of operational hours, and monitoring by the authorized regional government agencies. However, its effectiveness remains limited because trading activities extend beyond the market



boundaries and fall within a fragmented configuration of authority among the Trade Office, the Transportation Agency, the Civil Service Police Unit, and private land managers. Congestion in the area is not only triggered by the presence of traders, but also by the concentration of economic activities, on-street parking practices, public transportation stops outside designated points, and weak cross-sector coordination. This study concludes that the principal issue lies in the governance of authority and coordination that have not been sustainably integrated, such that the effectiveness of congestion control cannot be achieved solely through the normative instruments of the Regional Regulation.

KEYWORDS

Implementation of Regional Regulation, State Administrative Law, Fragmentation of Authority, Cross-Sector Coordination, Market Area Congestion

Introduction

Traffic congestion in urban areas is not solely triggered by an increase in vehicle volume, but also by the use of road space for activities beyond its transportation function, such as informal trading activities conducted on road bodies and sidewalks. The literature indicates that such practices are frequently regarded as disrupting the smooth flow of traffic and creating conflicts in the utilization of public space between mobility functions and informal economic activities.¹ Law Number 22 of 2009 concerning Road Traffic and Transportation stipulates that any act that interferes with the function of roads or road facilities is prohibited (Article 28 paragraphs (1) and (2)). This provision emphasizes that road space must be used in accordance with its designated purpose as an orderly and safe traffic facility. Furthermore, Article 43 provides that parking facilities shall, in principle,

¹ Nurul Widyawati Islami Rahayu et al., "The Public Space Paradox: Balancing Governance and Street Vending in Urban Indonesia," *Social Sciences and Humanities Open* 11, no. April (2025): 101559, <https://doi.org/10.1016/j.ssaho.2025.101559>.

be provided outside the road right-of-way, and if located on the road body, may only be placed in specific locations indicated by traffic signs or markings. Meanwhile, Article 13 emphasizes that the administration of traffic shall be conducted in a coordinated manner among relevant agencies. Thus, from a normative perspective, the utilization of road space and its regulation must be aligned with the primary function of the road and implemented in an integrated manner by the competent authorities. Various studies demonstrate that informal trading activities utilizing road shoulders or road sides contribute to increased side friction, reduced road segment capacity, and decreased vehicle speed, thereby disrupting the smooth flow of traffic in market areas.²

Trading activities along roadside areas frequently occur simultaneously with high vehicle mobility entering and exiting the area. The use of road bodies or shoulders by roadside traders may reduce the effective traffic space, increase density, and decrease vehicle speeds, thereby potentially causing congestion.³ These findings indicate that areas with intensive trading activities tend to experience greater traffic pressure. Such conditions can also be observed in the Projo Ambarawa Market area, Semarang Regency. Based on the author's direct observation, traffic density on the road segment in front of the market frequently occurs in the morning, particularly between 05.00 and 08.00, when Morning Market trading activities are taking place intensively and coincide with the mobility of individuals commuting to work and school. During this period, vehicle flow tends to slow down and queues often form around the market area.

From these preliminary observations, one factor that appears to be associated with this situation is the use of space around the road body for

² Syahril S Rumata, Didik S S Mabui, and Rezky Aprilyanto Wibowo, "Pengaruh Aktivitas Pedagang Kaki Lima Terhadap Volume Lalu Lintas Di Jalan Poros Pasar Otonom Koya Jayapura," in *Prosiding: Seminar Nasional Teknik Sipil Universitas Yapis Papua*, vol. 4, 2025, 179–86, <https://snts.ftuniyap.ac.id/index.php/prosiding/article/view/129>.

³ Nisvia Febriany and Iphan Fitriani Radam, "Pengaruh Pedagang Kaki Lima Terhadap Karakteristik Lalu Lintas Pada Ruas Jalan Dengan Tipe 2/2 Ud (Studi Kasus Jl. Jendral Sudirman Kota Banjarmasin)," *Jurnal Rivet* 2, no. 2 (2023): 69–76, <https://doi.org/10.47233/rivet.v2i01.473>.

Morning Market trading activities. A number of Morning Market traders were observed utilizing the road shoulder and even part of the road body as selling locations. This condition limits vehicle maneuvering space compared to the road width that should normally be available. Consequently, vehicles must reduce speed or pass alternately at certain points. Such congestion patterns are not incidental, but tend to recur at particular hours, especially in the morning, thereby creating a relatively dense traffic situation in the area. These preliminary findings form the basis for further examination of the relationship between Morning Market trading activities around the road body and the implementation of regulatory arrangements applicable at the regional level.

At the regional level, the regulation governing people's market activities in Semarang Regency is currently based on Regional Regulation of Semarang Regency Number 9 of 2024 concerning the Establishment, Arrangement, and Development of People's Markets, Shopping Centers, and Supermarkets. This Regulation serves as the legal basis for the local government in regulating market governance, ranging from the determination of market types, the structuring of traders, to the mechanisms for guidance and supervision. Under the general provisions, people's markets are classified into several forms, one of which is the Morning Market. Pursuant to Article 1 and further regulated in Article 21 paragraph (2), the Morning Market is a market that operates in the early hours of the morning and has a maximum operational limit until 07.00 WIB. The regulation of this time limitation demonstrates that trading activities in the Morning Market have, from the outset, been framed within a time-control framework, with the objective of maintaining a balance between economic activities and the function of the surrounding public space.

In addition to regulating operational hours, the Regional Regulation also governs the forms of trading facilities within the market. Article 1 number 20 explains the Basic Place or *oprokan*, namely a trading space

other than kiosks and stalls provided within the market environment. This means that *oprokan* does not constitute a category of illegal traders as long as it remains within the official market management system. Furthermore, Article 17 paragraph (2) emphasizes that traders occupying such facilities must possess a trader identity card issued by the authorized regional apparatus. This provision demonstrates that traders within the market structure, whether users of kiosks, stalls, or *oprokan*, are in fact already subject to the mechanism of guidance and supervision by the local government. Normatively, the regulatory construction indicates that Morning Market activities in Semarang Regency have clear limitations in terms of location, types of trading facilities, and operational hours. In other words, the existence of the Morning Market does not constitute a space without regulation. On the contrary, from a legal perspective, the Morning Market has been placed within a structured system aimed at maintaining order, security, and the smooth conduct of community activities in its surroundings.

Although the regulation concerning the Morning Market has been clearly formulated in Regional Regulation of Semarang Regency Number 9 of 2024, field dynamics indicate that conditions do not always operate ideally. In the Projo Ambarawa Market area, traffic density in the morning still occurs, particularly when trading activities reach their peak. This situation reflects a gap between the established normative construction and the reality of its implementation in practice. Therefore, it is important to examine how the provisions concerning the Morning Market are implemented and how the trading activities intersect with the function of the road and the mobility of the community around the market.

Efforts to reduce congestion in the Projo Ambarawa Market area have been undertaken through the implementation of a One-Way System (SSA) on Jalan Jenderal Sudirman.⁴ The SSA trial was implemented in April 2024

⁴ Fajar Wahyu Hermawan, "Penerapan SSA Di Jalan Sudirman Ambarawa Menunggu Izin Menkeu," *Info Publik*, 2024, <https://infopublik.id/kategori/nusantara/818192/index.html>.

and subsequently discontinued following a joint evaluation, inter alia, because it was still awaiting a recommendation from the Ministry of Public Works and Public Housing (PUPR) regarding the legality of the system's implementation.⁵ From the perspective of governmental law, these dynamics are related to the principle of the division of authority between the central and regional governments based on the status of the road. The literature on road management in the era of regional autonomy indicates that the division of authority based on road status frequently gives rise to dynamics in its implementation, including the tendency to revert authority to a higher level of government and the potential lack of coordination among agencies.⁶

In the doctrine of state administrative law, legality constitutes a fundamental prerequisite for every governmental action, including the exercise of discretion, which must be carried out in accordance with the General Principles of Good Governance, such as the principle of legal certainty and the principle of prudence. Policy changes within a relatively short period without a clear normative basis and explicit administrative considerations have the potential to create legal uncertainty and open space for administrative disputes. In this context, the temporary implementation and subsequent termination of the SSA require an evaluation of planning consistency, the basis of authority, and the administrative prudence underlying such actions.⁷

⁵ Polres Semarang, "Evaluasi Penerapan Sistem Satu Arah, Jalur Depan Pasar Projo Ambarawa Dibuka 2 Arah.," www.polressemarangkab.com, 2024, <https://berita.polressemarangkab.com/evaluasi-penerapan-sistem-satu-arah-jalur-depan-pasar-projo-ambarawa-dibuka-2-arah/> .

⁶ Yana Sahyana and Fakultas Perlindungan Masyarakat, "Problematika Pengelolaan Jalan Di Era Otonomi Daerah : Kewenangan Versus Kemampuan Problems of Road Management in the Era of Regional Autonomy : Authority Versus Ability," *Jurnal Ilmiah Wahana Bhakti Praja* 12, no. 1 (2022): 54–70, <https://doi.org/https://doi.org/10.33701/jiwbp.v12i1.2482>.

⁷ M Roma Dani M Arya Nur Sodikin, "Kebijakan Publik Dan Legalitas Tindakan Administrasi Pemerintahan: Suatu Pendekatan Yuridis-Normatif," *Jurnal Atribusi Hukum* Vol. [1] M (2026): 45–54, <https://lenterapublikasi.com/index.php/jah/article/view/134/21> .

The plan to reimplement the SSA re-emerged in early 2025 in conjunction with physical road repairs,⁸ however, after further evaluation, the route was once again restored to a two-way system.⁹ This sequence of policies demonstrates that traffic engineering has been attempted several times as a technical solution to congestion in the market area, yet has not resulted in a sustainable alleviation of traffic density. This condition indicates that congestion in front of the Projo Market does not solely derive from vehicle flow patterns, but is also related to the governance of trading activities and the configuration of authority among agencies within the area.

In addition to traffic engineering through the SSA, the plan to relocate Morning Market traders at Projo Ambarawa Market also formed part of the broader area restructuring efforts. In February 2025, a plan emerged to relocate approximately 1,400 Morning Market traders to a new location at the rear of the main market building. This information triggered unrest among traders, as they stated that they had never been invited to deliberate nor received official socialization before the plan became widely known. The traders expressed their objections not merely as a rejection of restructuring, but because the proposed location was considered not yet fully prepared in terms of facilities and business support, including the availability of parking areas, public facilities, and sufficient capacity to accommodate all traders. The action of visiting the market management office undertaken by representatives of the traders indicates a difference in perception between the policy plan and the level of readiness at the business actor level. This situation adds further dynamics to the restructuring process of the Projo

⁸ Diamanty Meiliana Dian Ade Permana, "Jalan Depan Pasar Projo Ambarawa Bakal Satu Arah, Separator Dibongkar, Target Selesai H-7 Lebaran," *kompas.com*, 2025, https://regional.kompas.com/read/2025/02/26/090448178/jalan-depan-pasar-projo-ambarawa-bakal-satu-arah-separator-dibongkar-target#google_vignette.

⁹ Abimanyu, "Program SSA Di Ambarawa Selesai, Kembali Dibuka Untuk Dua Jalur/Dua Arah," *rakyatnusantara.net*, 2025, <https://www.rakyatnusantara.net/2025/06/program-ssa-di-ambarawa-selesai-kembali.html>.

Market area, particularly in relation to how the relocation policy is understood and accepted by the directly affected parties.¹⁰

From the perspective of administrative law, the relocation of traders constitutes a form of governmental action that must be based on lawful authority and valid procedures. The literature indicates that local governments indeed possess the authority to regulate and relocate business locations; however, its implementation remains bound by the principle of legality and the General Principles of Good Governance.¹¹ This principle requires that every relocation policy be supported by a clear legal basis, not contradict higher-level regulations, and be implemented in a transparent and proportionate manner. In the context of the Projo Market relocation plan, the issue that emerges does not lie in the existence or absence of authority, but rather in how the policy process is formulated, communicated, and implemented toward the affected parties. The dynamics of traders' objections may therefore be interpreted as an evaluative indicator of procedural aspects, transparency, and administrative communication in the implementation of the relocation policy.

This series of policies demonstrates that congestion in the Projo Market area does not constitute merely a technical traffic issue. Various efforts have been undertaken through vehicle flow engineering and the relocation plan of Morning Market traders; however, field dynamics indicate that the issue involves dimensions of authority, administrative procedures, and social acceptance by the affected parties. This condition suggests that there remains room to further examine how market regulation

¹⁰ Diamanty Meiliana Dian Ade Permana, "Kaget Lapaknya Mau Dipindah, Pedagang Pasar Projo Ambarawa Geruduk Kantor Pengelola," *kompas.com*, 2025, <https://regional.kompas.com/read/2025/02/26/083131478/kaget-lapaknya-mau-dipindah-pedagang-pasar-projo-ambarawa-geruduk-kantor>.

¹¹ Nur Nidlomatus Silmi, Jati Nugroho, and Mochammad Zamroni, "Kajian Hukum Terhadap Prosedural Alih Fungsi Jalan Menjadi Kawasan Perpindahan Komersial Pusat Jajanan Rakyat Lumajang Dalam Perspektif Uu No 22 Tahun 2009 Tentang Lalu Lintas Dan Angkutan Jalan" 01, no. 01 (2024): 1–7, <http://stih-jendersudirman.com/index.php/argumentum/article/view/20%0A>.

and the implementation of local government authority are carried out within the context of congestion in the Projo Ambarawa Market area

Several previous studies have examined the implementation of regional regulations in the management of traditional markets. Research concerning the implementation of Regional Regulation of Pamekasan Regency Number 22 of 2013 demonstrates that the arrangement of Kolpajung Market has not been fully carried out in accordance with normative provisions, particularly in terms of management, supervision, and consistency in policy implementation.¹² These findings affirm that the existence of regulation does not automatically guarantee the effectiveness of market arrangement in practice.

Another study highlighting the implementation of regional regulations concerning street vendors in Nagara Market, Hulu Sungai Selatan Regency, reveals similar issues, namely weak inter-agency coordination, limited resources, and suboptimal supervision of street vendor activities.¹³ That study focuses more on the effectiveness of street vendor control as part of public order policy, without specifically linking it to the regime of people's market management.

From the perspective of regional autonomy law, research on the authority of local governments in the management of people's markets emphasizes that market regulation and management constitute part of delegated authority within the framework of decentralization.¹⁴ However, the study places greater emphasis on the legitimacy and normative construction of the division of authority, without examining how such

¹² Mohammad Bustanol Husein et al., "Implementasi Kebijakan Peraturan Daerah Pamekasan Nomer 22 Tahun 2013 Tentang Penataan Pasar Tradisional, Pusat Perbelanjaan, Dan Toko Modern Di Pasar Kolpajung Pamekasan Jawa Timur," *Journal Publicuho* 6, no. 1 (2023): 288–96, <https://doi.org/10.35817/publicuho.v6i1.120>.

¹³ Reno Affrian et al., "Implementasi Peraturan Daerah Kabupaten Hulu Sungai Pedagang Kaki Lima Di Pasar Nagara," *Jurnal Kebijakan Publik* Vol. 2, No (2025): 1380–92, <https://ejurnal.stiaamuntai.ac.id/index.php/PPJ/article/view/1436>.

¹⁴ Aziz Widhi et al., "Kewenangan Pemerintah Daerah Dalam Pengelolaan Pasar Rakyat Dalam Perspektif Hukum Otonomi Daerah," *Morality: Jurnal Ilmu Hukum* 10, no. 2 (2024): 306–16, <https://doi.org/DOI> : <http://dx.doi.org/10.52947/morality.v10i2.854>.

authority is implemented in concrete situations involving spatial planning and traffic issues within market areas.

Meanwhile, research on law enforcement concerning the management of traditional markets without parking facilities indicates that the absence of supporting infrastructure, such as parking space, directly impacts traffic disruption and the use of road bodies.¹⁵ The approach adopted places greater emphasis on law enforcement aspects and the fulfillment of market facility standards, without linking it to the implementation of regional regulations as policy instruments for trader arrangement.

On the other hand, studies on the implementation of legal policies on national roads highlight the importance of coordination between central and regional governments in controlling the use of road utility spaces that are frequently utilized for trading activities.¹⁶ Such research focuses on issues of authority and traffic control on national roads, without specifically associating them with regional market management policies as a source of trading activities.

Based on the overall body of research, it can be observed that the implementation of regional regulations in market management, trader control, the regulation of local governmental authority, and traffic congestion issues in commercial areas tend to be analyzed separately according to the specific focus of each study.

To date, no study has comprehensively positioned the Regional Regulation on Market Management as a legal instrument for the arrangement of Morning Market traders while simultaneously linking it to the effectiveness of congestion control within the context of the division and

¹⁵ Abdillah Ash Shiddiqy and Lutfian Ubaidillah, "Tinjauan Yuridis Terhadap Kebijakan Pemerintah Daerah Dalam Penanganan Perizinan Pedagang Kaki Lima Di Kabupaten Jember," *Indonesian Journal of Law and Justice* 2, no. 1 (July 24, 2024): 10, <https://doi.org/10.47134/ijlj.v2i1.3059>.

¹⁶ Yunanda Raharjanto, Bram Hertasning, and Febrianto Fatah Yogatama, "Implementasi Kebijakan Hukum Untuk Meningkatkan Pengaturan Dan Penertiban Pada Jalan Nasional: Studi Kasus Pada Ketertiban Lalu Lintas Dan Mobilitas Masyarakat," *Jurnal Penelitian Transportasi Darat* 25, no. 2 (2024): 142–48, <https://doi.org/10.25104/jptd.v25i2.2281>.

fragmentation of authority among regional government agencies. This analytical gap constitutes the contribution of the present study, namely by examining how the implementation of Regional Regulation of Semarang Regency Number 9 of 2024 operates in practice and why its implementation has not yet been fully capable of alleviating traffic congestion in the Projo Ambarawa Market area.

From the perspective of State Administrative Law, the effectiveness of a policy is not solely determined by the existence of written norms, but also by how authority is exercised in accordance with the principles of legality, accountability, and good governance. Reform in State Administrative Law emphasizes the importance of regulatory harmonization, limitations on the use of discretion, and the strengthening of supervisory mechanisms in order to ensure legal certainty and prevent abuse of authority.¹⁷ Accordingly, the success of a regional regulation is not measured merely by its normative construction, but by the consistency of its implementation in governmental administrative practice.

In the context of decentralization, the division of governmental affairs between the central and regional governments that is not accompanied by clear boundaries of authority has the potential to generate administrative conflicts and regulatory disharmony.¹⁸ The phenomenon of dualism or overlapping authority among levels of government indicates that unclear coordination and weak dispute resolution mechanisms may lead to a decline in the effectiveness of public service delivery.¹⁹ In such circumstances, issues of policy implementation are no longer confined to normative

¹⁷ J Putra Ginting et al., "Reformasi Hukum Administrasi Negara Dalam Mewujudkan Good Governance Dan Kepastian Hukum Di Indonesia," *Locus: Jurnal Konsep Ilmu Hukum* 5, no. 2 (2025): 156–63, <https://doi.org/https://doi.org/10.56128/jkih.v5i2.531>.

¹⁸ Aulia Rahmawati A Muhammad Yoviansyah, Putrie Clarisa S, Rasetya Hati Satriani, "Konflik Kewenangan Antara Pemerintah Pusat Dan Daerah Dalam Penetapan Kebijakan Administratif: Analisis Dari Sudut Pndang HAN," *Jurnal Hukum Dan Kewarganegaraan* Vol. 13 No (2025), <https://doi.org/doi.org/10.3783/causa.v2i9.2461>.

¹⁹ Dimas Sis Tiarridza, "Dualisme Kewenangan Pemerintahan Daerah Di Kalimantan Selatan: Kajian Hukum Atas UU No. 23 Tahun 2014 Tentang Pemerintahan Daerah," *CONSTITUO : Journal of State and Political Law Research* 4, no. 1 (2025): 135–46, <https://doi.org/10.47498/constituo.v4i1.5143>.

compliance, but also concern the governance structure and configuration of authority operating in practice.

On the other hand, the use of discretion in governmental administrative practice is intended as an instrument to address concrete problems when existing norms are incomplete or result in stagnation.²⁰ However, the exercise of discretion must remain within the framework of legality, serve the public interest, and not exceed the limits of authority vested in government officials. Therefore, the analysis of the implementation of the Regional Regulation on Market Management in this study does not merely examine the conformity between norms and practice, but also explores how the structure of authority, inter-agency coordination, and administrative governance influence the effectiveness of policy in controlling congestion in the Projo Ambarawa Market area.

Normatively, Regional Regulation of Semarang Regency Number 9 of 2024 concerning the Establishment, Arrangement, and Development of People's Markets has provided a legal basis for the local government in regulating the activities of Morning Market traders in the Projo Ambarawa Market area. The Regulation governs aspects of spatial arrangement, trader designation, and limitations on operational hours as instruments for controlling trading activities. Nevertheless, empirical conditions demonstrate that traffic density around the market continues to recur, particularly during peak trading hours.

This situation indicates a gap between the normative design of the policy and the effectiveness of its implementation within the governance context of the market area, which involves multiple actors and sectoral authorities. Therefore, this study is directed at examining how Regional Regulation of Semarang Regency Number 9 of 2024 is implemented in the arrangement of Morning Market traders, as well as analyzing the structural

²⁰ Rahmat Saputra, "Konsep Penerapan Diskresi Inovatif Dalam Mewujudkan Kesejahteraan Rakyat," *Konferensi Nasional Asosiasi Pengajar Hukum Tata Negara Dan Hukum Administrasi Negara* 2, no. 1 (2024): 431–76, <https://doi.org/10.55292/fv07ty56>.

and administrative factors that influence its effectiveness in efforts to control congestion in the Projo Ambarawa Market area.

Methods

This research constitutes legal research employing an empirical juridical approach, namely research that examines applicable legal provisions and their implementation in practice within society.²¹ This approach is applied because the study does not merely analyze the norms contained in Regional Regulation of Semarang Regency Number 9 of 2024, but also examines how its implementation is carried out in the arrangement of Morning Market traders at Projo Ambarawa Market. The research was conducted in the Projo Ambarawa Market area, Semarang Regency. The data used consist of primary data and legal materials. Primary data were obtained through interviews with the Trade Office of Semarang Regency and Morning Market traders, as well as through direct observation of trader arrangement and traffic conditions around the market area.²² Primary legal materials include Regional Regulation of Semarang Regency Number 9 of 2024 and the Law concerning Road Traffic and Transportation. Secondary legal materials consist of books and scholarly journals relevant to the implementation of regional policies and market management. The collected data were analyzed qualitatively by comparing normative provisions with factual conditions in the field in order to assess the implementation of the regulation and the factors influencing its effectiveness in addressing congestion issues.

²¹ Soerjono Soekanto, "Pengantar Penelitian Hukum," (*UI-Press*), 2006.

²² Kornelius Benuf and Muhamad Azhar, "Metodologi Penelitian Hukum Sebagai Instrumen Mengurai Permasalahan Hukum Kontemporer," *Gema Keadilan* 7, no. 1 (2020): 20–33.

Result and Discussion

1. Implementation of Regional Regulation of Semarang Regency Number 9 of 2024 in the Arrangement of Morning Market Traders at Projo Ambarawa Market

The arrangement of Morning Market traders in Semarang Regency is normatively regulated under Regional Regulation of Semarang Regency Number 9 of 2024 concerning the Establishment, Arrangement, and Development of People's Markets, Shopping Centers, and Supermarkets, which serves as the principal legal basis in governing institutional structure, market classification, mechanisms for trader designation, as well as operational hours of trading activities in people's markets. Conceptually, the Morning Market has been explicitly recognized in the general provisions of the Regulation, wherein Article 1 number 13 stipulates that the Morning Market constitutes a People's Market operating from the early hours of the morning until the morning. This normative recognition indicates that early-morning trading activities do not merely represent an informal phenomenon, but rather form part of the official structure of people's markets regulated by the local government. The classification of People's Markets is further affirmed in Article 5 paragraph (1), which distinguishes between Main Markets and Morning Markets, thereby establishing that the existence of the Morning Market possesses equal legal legitimacy as part of the people's market system administered and supervised by the local government.

In the context of trading facilities, the Regional Regulation also recognizes the existence of the Basic Place or *oprokan*, which in Article 1 number 20 is defined as a trading space located within the market and market area that does not constitute a kiosk or stall and is specifically designated for trading activities. This provision demonstrates that non-kiosk forms of trading remain legally recognized as long as they are situated within the official market management system. The existence of *oprokan*

traders is not free from administrative regulation, as Article 17 paragraph (2) emphasizes that trader designation shall be evidenced by the issuance of a Trader Proof Card (KBP) for users of kiosks or stalls, and a Trader Identity Card (KIP) for traders utilizing the Basic Place or *oprokan*. Accordingly, every trader occupying an *oprokan* is required to be registered within the official administrative system of the local government through possession of a KIP, the validity of which is regulated under Article 18 paragraph (2) for a period of one year and may be renewed, thereby establishing that the right to use a trading space is limited in nature and subject to periodic administrative evaluation.

From the perspective of spatial regulation and capacity, Article 19 paragraph (2) limits the use of the Basic Place or *oprokan* to a maximum area of 2 m² for each trader as a normative instrument to maintain order and prevent the expansion of trading space that may potentially disrupt market spatial arrangement. Another significant provision concerns operational hours, wherein Article 21 paragraph (2) determines that the operational hours of Morning Market traders may commence at the earliest at 00.00 WIB and must close no later than 07.00 WIB, thereby establishing an official temporal boundary for Morning Market activities and functioning as an instrument to control the impact of trading activities on the surrounding environment, including traffic conditions. The Regulation also provides limited discretionary authority to the regional head through Article 21 paragraph (4), which stipulates that the Regent may determine operational hours beyond the aforementioned provisions by considering socio-economic conditions, market location, and type of business, meaning that changes to operational hours cannot be conducted arbitrarily but must be grounded in rational and contextual considerations.

In addition to administrative regulation, aspects of supervision and public order are also governed, wherein Article 14 paragraph (1) provides that order and security within People's Markets constitute the responsibility of the regional apparatus administering governmental affairs in the field of

trade, and Article 25 regulates the possibility of imposing administrative sanctions for certain violations, including violations of operational hour provisions.

Accordingly, from a normative perspective, Regional Regulation Number 9 of 2024 has established a legal design for the arrangement of the Morning Market encompassing institutional recognition of the Morning Market, regulation of trading facilities including *oprokan*, administrative obligations through KIP ownership, limitation of trading space area, regulation of operational hours up to a maximum of 07.00 WIB, as well as mechanisms of supervision and administrative sanctions. The regulatory framework therefore demonstrates that Morning Market trading activities have been placed within a structured system equipped with sufficiently clear control instruments.

Normatively, the arrangement of Morning Market traders under Regional Regulation of Semarang Regency Number 9 of 2024 is carried out through mechanisms for trader designation and regulation of operational hours. Article 17 paragraph (2) stipulates that traders occupying a Basic Place or *oprokan* are required to possess a Trader Identity Card (KIP) as proof of the right to use the trading space, and such KIP is valid for one year and may be renewed as regulated under Article 18 paragraph (2). In addition, Article 21 paragraph (2) affirms that the operational hours of Morning Market traders are limited to no later than 07.00 WIB. These provisions demonstrate that, by legal design, Morning Market traders are not informal entities operating outside the system, but rather constitute part of the official structure of the people's market recognized and administered by the local government. Accordingly, the existence of *oprokan* traders within the market area possesses administrative legitimacy insofar as they fulfill the KIP requirements and comply with operational provisions.

Based on the interview conducted on 20 February 2026 with Mr. KZM, Functional Trade Analyst in the Market and Street Vendors Division at the

Department of Trade, Industry, and Cooperatives of Semarang Regency, it was stated that Morning Market traders located within the market area, including those occupying the courtyard or official Basic Places/*oprokan*, have all been registered and possess KIP. The 2024 data recapitulation shows 401 *oprokan* traders, of which 316 are active and 85 inactive, indicating that trading activities within the internal courtyard form part of the official management system under the authority of the Department of Trade, Industry, and Cooperatives (Disdagperinkop). In practice, the Department conducts periodic monitoring of traders within the market area on average once a week, and such supervision includes enforcement of operational time limits. In the event of violations of operational hours, administrative sanctions may be imposed, including revocation of the KIP as a form of rule enforcement, wherein provisions concerning administrative sanctions are regulated under Article 25 of the Regional Regulation.

From the perspective of compliance, based on an interview conducted on 17 February 2026 with an *oprokan* trader identified by the initial Z who conducts trading activities within the market area, it was stated that there is awareness regarding the limitation of operational hours. Z explained that trading activities commence at approximately 03.00 WIB and cease before or precisely at 07.00 WIB in accordance with the applicable provisions. However, it was also acknowledged that not all traders consistently comply with the prescribed time limits, such that enforcement of the rules still requires consistent supervision.

Based on the foregoing description, the implementation of the normative provisions toward traders within the market area relatively operates within a clear scope of authority, as the traders are registered, possess official identification, and are subject to the Department's monitoring system. Nevertheless, with the number of active traders exceeding three hundred individuals within the same operational time frame, the intensity of economic activity from the early hours until the

morning becomes concentrated within a relatively short period, such that administratively the arrangement has been implemented, although factually such activities continue to carry implications for the dynamics of the market area, particularly during peak morning hours.

Normatively, the authority for managing People's Markets under Regional Regulation of Semarang Regency Number 9 of 2024 rests with the Regional Apparatus administering governmental affairs in the field of trade. The designation of traders, issuance of KIP, and supervision of order and operational hours are carried out by such Regional Apparatus as regulated under Article 17 and Article 14. Accordingly, the legal scope of authority of Disdagperinkop is limited to traders located within the market area that constitutes Regional Government assets, and based on the interview results it was stated that such authority factually only encompasses *oprokan* traders situated within the market fence.

However, based on interviews and field observations, Morning Market trading activities around Projo Ambarawa Market do not entirely take place within the market fence. There are traders operating at several points outside the formal market area, namely in the former CPM area (privately owned land), in the former terminal area, as well as along the roadside and sidewalks throughout the Kupang Kidul corridor. This spatial distribution indicates that factually the Morning Market ecosystem extends beyond the administrative boundaries of the market managed by Disdagperinkop.

With respect to traders in the former CPM area, Disdagperinkop stated that it does not possess authority, as the land constitutes private property. Traders operating in that location also confirmed that they pay fees to the private land manager rather than to the local government. This circumstance places trading activities in the former CPM area outside the trader designation mechanism as regulated under Article 17 of the Regional Regulation, since no KIP is issued by the Regional Apparatus.

Meanwhile, the former terminal area, which had previously been under the management of Disdagperinkop, was returned to the Department of Transportation through an administrative asset transfer process in October 2025. Following such transfer, authority over that location no longer resides with the trade department. A similar condition applies to traders operating on the road body and sidewalks, which, in the context of traffic regulation, fall under the authority of the Department of Transportation and, in the context of public order, may involve the Civil Service Police Unit.

From a practical perspective, traders operating outside the market fence generally maintain operational hours exceeding the maximum limit of 07.00 WIB as stipulated in Article 21 paragraph (2) of the Regional Regulation. Several traders acknowledged that they continue trading until 09.00 or even 10.00 WIB. The absence of KIP issuance and the lack of routine supervisory mechanisms from Disdagperinkop result in the operational hour provisions not effectively extending to traders located outside the formal market area.

This condition indicates that the implementation of Regional Regulation Number 9 of 2024 is factually limited to the scope of administrative authority under the management of the local government. Traders within the market fence are subject to identification systems, monitoring, and administrative sanctions. Conversely, traders outside the market fence operate within a fragmented domain of authority shared among the local government, other agencies, and even private managers.

Such fragmentation of authority leads to non-uniform enforcement of normative provisions, particularly concerning operational hours and spatial arrangement of trading activities. On the one hand, the local government possesses a clear legal basis to regulate traders within the market. On the other hand, trading activities outside the market fence continue to operate because they fall outside the direct management domain of Disdagperinkop. Accordingly, from an administrative standpoint, the effectiveness of

regulation is determined not solely by the existence of normative provisions, but also by the institutional boundaries of authority attached to each respective agency.

Based on the interview conducted on 20 February 2026 with Mr. KZM, Functional Trade Analyst in the Market and Street Vendors Division of the Department of Trade, the structural arrangement of the Morning Market at Projo Ambarawa Market reflects a distribution of authority that is not fully integrated among agencies. Administratively, Disdagperinkop only possesses authority over traders located within the market area constituting Regional Government assets. Traders who hold KIP and occupy official Basic Places or *oprokan* fall within the Department's supervisory system, including periodic monitoring and enforcement of the maximum operational hour of 07.00 WIB as regulated under Regional Regulation Number 9 of 2024. However, trading activities outside the market fence, such as those in the former CPM area (privately owned land), the former terminal area transferred to the Department of Transportation, as well as on road bodies and sidewalks along the Kupang Kidul access corridor, do not fall within the direct authority of Disdagperinkop.

This situation creates a dispersed configuration of authority. The former CPM area is managed privately, the former terminal area has been returned to the Department of Transportation through asset administration, while the use of road bodies and sidewalks falls under traffic regulation by the Department of Transportation and public order aspects that may involve the Civil Service Police Unit. Consequently, the arrangement of Morning Market traders does not operate under a single unified administrative chain of command, but is divided according to land status and spatial function. Factually, traders outside the market fence continue operating beyond 07.00 WIB and are not subject to the same identification and monitoring system as officially registered traders within the market.

From the perspective of regional autonomy law, the management of People's Markets constitutes part of governmental affairs delegated to the region as a consequence of the decentralization principle.²³ The local government is not only authorized to enact policies through regional regulations, but is also responsible for fostering, supervising, and organizing market operations as instruments of public service and community economic empowerment. Studies indicate that although the Regional Regulation has provided for market supervision, its implementation has not been fully optimal due to weak oversight and administrative inconsistency.²⁴

However, in the practice of regional governance, the division of authority without clear functional boundaries and adequate coordination among governmental organs has the potential to generate disharmonious policy implementation. Within the framework of administrative law, the exercise of authority is not only subject to the principle of legality, but must also adhere to the General Principles of Good Governance (AUPB), which require legal certainty, accountability, prudence, and orientation toward the public interest. The implementation of AUPB in regional governance demonstrates that the quality of policy execution is significantly influenced by the capacity of apparatus, supervisory mechanisms, and consistency in applying principles of good governance.²⁵

In this context, although Projo Market is not situated within a vertical conflict of authority between central and regional governments, the

²³ Widhi et al., "Kewenangan Pemerintah Daerah Dalam Pengelolaan Pasar Rakyat Dalam Perspektif Hukum Otonomi Daerah." *Morality: Jurnal Ilmu Hukum* 10, no. 2 (2024) DOI : <http://dx.doi.org/10.52947/morality.v10i2.854>

²⁴ Yuny Handayani Hrp et al., "Kewenangan Pemerintah Daerah Kota Pekanbaru Terhadap Pelaksanaan Pembinaan Pasar Sukramai Trade Center Berdasarkan Pasal 34 Ayat (2) Huruf C Peraturan Daerah Nomor 09 Tahun 2014 Tentang Pengelolaan Pasar Rakyat, Pusat Perbelanjaan Dan Toko Swalayan," *Jurnal Ilmiah Bidang Sosial, Ekonomi, Budaya, Teknologi, Dan Pendidikan* 2, no. 6 (2023): 1693–1706, <https://doi.org/https://doi.org/10.54443/sibatik.v2i6.922>.

²⁵ Khalid Prawiranegara, "Implementasi Asas-Asas Umum Pemerintahan Yang Baik Pada Pemerintahan Kabupaten Dompu," *Jurnal Lex Renaissance* 6, no. 3 (2021): 591–604, <https://doi.org/10.20885/jlr.vol6.iss3.art11>.

emerging pattern reflects fragmentation of authority among regional apparatus and the involvement of private parties in managing the market area. This condition creates a division of functions that is not fully integrated, thereby limiting administrative intervention to the respective domain of each institution's authority. Consequently, although normative provisions are available, policy implementation risks proceeding in a partial manner and not being fully responsive to the complexity of issues on the ground.

Furthermore, based on the interview conducted on 20 February 2026 with Mr. KZM, Functional Trade Analyst in the Market and Street Vendors Division of the Department of Trade, cross-sectoral coordination between Disdagperinkop and the Department of Transportation does take place, particularly prior to certain occasions such as the month of Ramadan or religious holidays. However, such coordination does not occur continuously on a daily basis due to personnel limitations and division of tasks. This condition indicates that coordination remains situational and has not yet been fully institutionalized within a stable mechanism. In public policy implementation studies, inter-agency coordination depends not only on formal procedures, but also on the existence of coordination mechanisms that operate consistently and structurally. When coordination is not supported by stable mechanisms, fragmentation of authority and separated division of tasks may hinder the effectiveness of policy implementation.²⁶

Such fragmentation of authority affects the limited scope of implementation of Regional Regulation Number 9 of 2024. Normatively, the Regional Regulation has stipulated the principles of legal certainty, utility, as well as the fostering and supervision of People's Markets. However, the effectiveness of these normative provisions in reducing traffic

²⁶ Yoyok Cahyono, "Koordinasi Antar Lembaga Dalam Implementasi Kebijakan Publik: Studi Kualitatif Tata Kelola Kolaboratif," *JLPG* | 14 *Journal of Law, Policy, and Governance (JLPG)* 1, no. 1 (2026): 15, <https://ejournal.ayasophia.org/index.php/jlpg/article/view/213>.

congestion and regulating Morning Market traders becomes limited when a portion of economic activities takes place in spaces that fall outside the formal authority of the trade department. In other words, the issue of congestion and density in the market area is not solely a matter of trader non-compliance, but rather a consequence of a fragmented governance configuration. Policy implementation in this context cannot be separated from the structure of authority operating on the ground; as long as such structure has not been integrated within a sustainable coordination framework, the arrangement of the market area will continue to encounter institutional obstacles.

Based on the overall description above, it can be concluded that Regional Regulation of Semarang Regency Number 9 of 2024 concerning the Establishment, Arrangement, and Development of People's Markets has, in principle, been implemented, particularly with respect to Morning Market traders located within the market area who possess a Trader Identity Card (KIP). The regulation of operational hours, trader identification mechanisms, and periodic monitoring demonstrate that administratively the normative provisions of the Regional Regulation are enforced within the scope of authority of Disdagperinkop. Nevertheless, such implementation remains partial, as Morning Market economic activities factually extend beyond the administrative boundaries of the market under the management domain of the trade department. The presence of traders in the former CPM area, the former terminal area, as well as on road bodies and sidewalks indicates that market activities are distributed across several distinct regimes of authority, including the authority of the Department of Transportation, the Civil Service Police Unit, and private managers. The fragmentation of authority and cross-sectoral coordination that has not operated in a sustainable manner result in the implementation of the Regional Regulation not being comprehensively integrated in the arrangement of the market area. Accordingly, the issues of density and congestion surrounding Projo Ambarawa Market cannot be fully resolved

solely through the normative instrument of the Regional Regulation, but are also influenced by the configuration of governance authority operating in practice.

2. The Effectiveness of the Arrangement of Morning Market Traders in Addressing Congestion in the Projo Ambarawa Market Area

Within the framework of governmental discretion, administrative officials are permitted to make decisions and/or take actions to address concrete problems encountered in the administration of government when statutory regulations do not regulate, are incomplete, are unclear, or when governmental stagnation occurs.²⁷ In the context of Projo Market, the plan to relocate Morning Market traders may be qualified as a form of administrative discretion, as such relocation does not constitute a normative mandate explicitly required under the Regional Regulation, but rather represents a policy choice adopted by the local government to respond to area density and congestion issues. Accordingly, relocation constitutes an administrative action based on policy discretion aimed at resolving a concrete problem. However, as emphasized in administrative law doctrine, the exercise of discretion must be conducted within the framework of legal certainty, accountability, and clear limitations so as not to generate uncertainty or inconsistency in implementation.²⁸ Furthermore, literature on the reconceptualization of discretion underscores the necessity of establishing structured standard operating procedures and strengthening supervisory mechanisms to ensure that the exercise of discretion remains within the framework of legal certainty, accountability, and the public

²⁷ Asmara Galang, "Urgensi Kewenangan Diskresi Dalam Penyelenggaraan Pemerintahan Untuk Memajukan Kesejahteraan Umum," *Jurnal Diskresi* 1, no. 1 (2022): 1–16, <https://journal.unram.ac.id/index.php/diskresi>.

²⁸ Firdaus Arifin and Harri Tri Ramdhani, "Rekonseptualisasi Diskresi Perspektif Hukum Administrasi Negara: Analisis Kritis Terhadap Implementasi Undang-Undang Administrasi Pemerintahan," *Konferensi Nasional Asosiasi Pengajar Hukum Tata Negara Dan Hukum Administrasi Negara* 2, no. 1 (2024): 115–48, <https://doi.org/10.55292/evaza559>.

interest, and does not result in inconsistency or uncertainty in administrative decision-making.²⁹

Based on the interview conducted on 20 February 2026 with Mr. KZM, Functional Trade Analyst in the Market and Street Vendors Division of the Department of Trade, the relocation plan essentially originated from a recommendation of the Special Committee of the Regional House of Representatives (DPRD) of Semarang Regency, which encouraged area restructuring to reduce congestion around the market. The relocation was primarily designed for Morning Market traders located in the courtyard or internal yard of the market, namely the group of *oprokan* traders who administratively possess a Trader Identity Card (KIP) and are part of the official management system of the local government. Physically, the relocation site had already been constructed as a technical prerequisite for the transfer of traders. However, before the plan was formally disseminated by the Department, information regarding the relocation had circulated among traders and generated concerns that developed into resistance. Several traders expressed objections through demonstrations, as they felt that they had not received comprehensive explanations regarding the relocation mechanism, capacity, and allocation pattern at the new location. In fact, according to the Department's explanation, a socialization agenda had been planned but had not yet been fully implemented at the time such resistance emerged.

In addition, the relocation targeted only traders located within the market area, while traders outside the market fence, including those in the former CPM area and along the roadside, were not included in the scheme. In the context of the objective of reducing congestion, this condition raises questions regarding the consistency of policy design, because if a portion of

²⁹ Firdaus Arifin, "Rekonseptualisasi Diskresi Perspektif Hukum Administrasi Negara: Analisis Kritis Terhadap Implementasi Undang-Undang Administrasi Pemerintahan Nasional," *Audi Et AP : Jurnal Penelitian Hukum* 4, no. 01 (2025): 25–37, <https://doi.org/10.24967/jaeap.v4i01.3867>.

the sources of density remain in their original locations, partial relocation may not comprehensively resolve the problem. Ultimately, the relocation was not continued in order to avoid potential social conflict, and the government opted instead to reaffirm the limitation of Morning Market operational hours until 07.00 WIB as stipulated in the Regional Regulation.

When examined through the perspective of the General Principles of Good Governance (AUPB), particularly the principles of transparency, participation, and accountability, the prior construction of relocation facilities without adequate social consolidation and policy communication reflects weak integration between administrative planning and social acceptance. This condition contributed to the emergence of traders' concerns regarding potential declines in turnover, changes in customer patterns, and the capacity of the relocation site, thereby rendering a formally lawful policy less effective sociologically. Policy effectiveness within the framework of good governance is not solely determined by infrastructural readiness, but also by the quality of implementation of accountability, transparency, and openness in institutional management.³⁰ Accordingly, the discontinuation of the relocation may be understood not merely as a technical failure, but as a consequence of a policy design that was not yet fully aligned with the principles of AUPB and the actual economic needs of the market community.

Normatively, Regional Regulation of Semarang Regency Number 9 of 2024 concerning the Establishment, Arrangement, and Development of People's Markets provides the legal basis for the Regional Government to undertake regulation and supervision of trading activities within People's Markets, including the Morning Market. Within its regulatory construction, such authority is exercised through the regional apparatus responsible for trade affairs, such that the administrative scope of implementation is

³⁰ Ni Luh Kristinawati, "Perspektif Good Governance Dalam Revitalisasi Pasar Rakyat Gianyar," *Socio-Political Communication and Policy Review* 2, no. 1 (2025): 1–15, <https://doi.org/10.61292/shkr.191>.

confined to market areas constituting assets and managed by the Regional Government. However, field dynamics demonstrate that economic activities in the Projo Ambarawa Market area are not limited to the formal market space as intended under the Regional Regulation, but extend to the former CPM area, which constitutes privately owned land, the former terminal area whose management has been returned to the Department of Transportation, as well as sidewalks and road bodies along the Kupang Kidul corridor, which functionally fall within the domain of traffic regulation.

Based on the interview conducted on 20 February 2026 with Mr. KZM, Functional Trade Analyst in the Market and Street Vendors Division of the Department of Trade, it was confirmed that the direct authority of Disdagperinkop only encompasses traders located within the market fence who possess KIP, whereas traders in the former terminal area are no longer under the Department's management following the transfer of assets to the Department of Transportation. Meanwhile, traders in the former CPM area operate on privately owned land, and traders on sidewalks and road bodies fall within the authority of the Department of Transportation and the Civil Service Police Unit in the context of public order.

This fact is further corroborated by statements from traders operating outside the market fence. Based on interviews conducted on 17 February 2026 with traders identified by the initials SR and TT who operate in the former CPM area, it was stated that they are not registered within the market administrative system and do not possess a Trader Identity Card (KIP). They explained that payments for trading space and parking are made to the private manager of the former CPM land rather than to the Regional Government. Similar statements were conveyed by traders identified by the initials TM and IT who operate along the Kupang Kidul corridor. Both stated that payments are made to a local association rather than to the Department of Trade, and that there is no mechanism of direct socialization from the Department concerning trading regulations.

Accordingly, there exists a sectoral separation of authority between market management as an economic entity and the regulation of traffic and public order as matters of transportation and public order governance.

Furthermore, the implementation of public policy within the context of modern governance is confronted with high institutional complexity, thereby requiring effective inter-agency coordination. Studies on inter-agency coordination indicate that fragmentation of authority and overlapping regulations frequently constitute primary obstacles to successful policy implementation.³¹ In the practice of managing the Projo Market area, cross-sector coordination is indeed carried out at certain moments, such as prior to major holidays, however, it has not yet been established as a systematic and sustainable collaborative mechanism. Consequently, market regulations that are normatively comprehensive are only effective within the administrative sphere directly controlled by Disdagperinkop, while congestion issues arising from activities on sidewalks, road bodies, and parking points are not fully integrated into the design of the market policy itself.

In addition, parking along road shoulders and the stopping of vehicles around the market area further reinforce the cross-authority character of the area. Parking on road shoulders constitutes part of the traffic management system under the authority of the local government. However, in practice, violations of designated parking spaces and weak supervision of road body usage have the potential to disrupt traffic flow.³² In the case of Projo Market, the practice of public transportation vehicles stopping and parking around trading points outside the market fence demonstrates that congestion cannot be reduced solely to the issue of market traders, but

³¹ Cahyono, "Koordinasi Antar Lembaga Dalam Implementasi Kebijakan Publik: Studi Kualitatif Tata Kelola Kolaboratif."

³² Maulana Hasanudin, "The Role of Judges in Dealing with Community Development," *Walisongo Law Review (Walrev)* 2, no. 2 (2020): 195, <https://doi.org/10.21580/walrev.2020.2.2.6597>.

rather constitutes the result of interaction among economic activities, transportation systems, and public space governance.

From the foregoing description, it may be concluded that the implementation of Regional Regulation Number 9 of 2024 has factually been carried out within the formal authority domain of the local government, particularly with respect to traders located within the market fence. However, because the economic activity space of the Projo Market area extends beyond a single administrative authority domain and involves different agencies with respective sectoral orientations, its implementation remains partial and not yet integrated within a comprehensive area management framework. In other words, the issue encountered is not merely the absence of regulation, but rather a fragmented configuration of authority, such that market regulation operates within its own sectoral boundaries while area-related problems transcend such boundaries.

Based on the interview conducted on 20 February 2026 with Mr. KZM, Functional Trade Analyst in the Market and Street Vendors Division of the Department of Trade, it was revealed that administratively registered *oprokan* traders possessing KIP number in the hundreds and operate within a relatively simultaneous time range from the early morning until approximately 07.00 WIB. At the same time, traders outside the market fence, both in the former CPM area and along the Kupang Kidul roadside, also operate within nearly the same time frame. These activities attract a concentration of buyers arriving by private vehicles and public transportation. The practice of picking up and dropping off passengers outside official terminals not only reflects low legal compliance among drivers, but also has the potential to disrupt order and traffic flow in urban areas.³³ Accordingly, the presence of public transportation vehicles stopping or waiting around the market area cannot be understood merely as

³³ A. Aco Agus, "Analisis Tingkat Kepatuhan Hukum Berlalu Lintas Bagi Pengemudi Angkutan Umum Antar Kota Di Makasar," *Jurnal Ilmiah Ilmu Administrasi Publik* 6, no. 2 (2021): 55, <https://doi.org/10.26858/jiap.v6i2.2558>.

individual driver behavior, but rather as part of an interaction pattern between economic needs and a transportation system that is not yet fully aligned.

The phenomenon of roadside parking and the use of road bodies as temporary stopping spaces has been proven to cause congestion and disrupt traffic flow. From the perspective of legal effectiveness theory, regulations concerning parking prohibitions will not operate effectively if not supported by adequate coordination among government authorities, the community, and business actors. Studies on illegal parking indicate that regulatory ineffectiveness is primarily influenced by low public legal awareness and the lack of consistent enforcement and supervision.³⁴ This is consistent with interview statements indicating that limitations on stopping time for public transportation had previously been implemented; however, in practice, such measures were difficult to supervise continuously due to limited cross-sector coordination and the complexity of economic demands in the field.

Based on these conditions, it can be understood that congestion issues surrounding Projo Market are not solely caused by the presence of traders within the market or by the behavior of public transportation drivers in isolation, but rather by the accumulation of economic activities and vehicle movements occurring within the same space and time. When trader management is focused on the area within the market fence in accordance with the authority of Disdagperinkop as regulated under the Regional Regulation, while traffic regulation, parking management, and terminal functions fall under the authority of different agencies, the handling approach tends to operate according to respective administrative boundaries. In such a situation, the interaction between trading activities and traffic becomes difficult to comprehensively control, and its impact

³⁴ Bagus Armanda, "Parkir Liar Dalam Perspektif Teori Efektifitas Hukum," *Jurnal Pelita Nusantara* 1, no. 4 (2024): 477–81, <https://doi.org/10.59996/jurnalpelitanusantara.v1i4.351>.

continues to be manifested in the form of density and vehicle queues during peak morning hours.

Based on the interview results with Disdagperinkop, one factor repeatedly identified as a trigger of congestion is the activity of public transportation vehicles stopping to pick up and drop off passengers around the market entrance. Such practice does not occur at a single point, but rather follows the concentration flow of buyers during peak Morning Market hours. Several traders operating outside the market fence also confirmed that public transportation vehicles frequently stop abruptly, and even wait for passengers, thereby narrowing the movement space for other vehicles. A maximum stopping time limit of five minutes had previously been implemented; however, in practice, supervision was not consistently enforced due to the dynamics of economic demands in the field and limited supervisory personnel. This fact demonstrates that regulations limiting stopping duration do not automatically become effective unless accompanied by adequate and sustainable control systems.

In addition to public transportation vehicles, roadside parking further complicates the situation. There are practices of parking beneath no-stopping signs which, in certain cases, are managed by local associations or non-governmental actors rather than directly by the relevant government agency. In particular circumstances, road bodies that should function as vehicle movement space shift into temporary stopping areas for buyers' vehicles as well as traders' commercial vehicles. Disdagperinkop itself emphasized that its authority is limited to traders within the market, whereas traffic and parking regulation fall under the authority of the Department of Transportation. This fragmentation of authority affects the weak integration of supervision between economic activities and the transportation system within the same area.

These conditions demonstrate that congestion problems surrounding Projo Market are more appropriately understood as weaknesses in traffic

management within an area experiencing high economic activity pressure. Morning Market trading activities, with hundreds of active *oprokan* traders operating within a relatively simultaneous time frame, logically generate a concentration of vehicles within a short period. When such concentration intersects with the stopping patterns of public transportation, roadside parking practices, and limited road space, a reduction in effective road capacity occurs. In such circumstances, congestion is not merely the result of the presence of traders, but rather the outcome of simultaneous interaction among economic activities, transportation behavior, and supervisory systems that have not yet been consistently integrated.

Accordingly, simplifying the issue into “traders as the primary cause of congestion” does not fully reflect the complexity of the field conditions. Interview data indicate that even traders who comply with operational hour limitations remain within the same area system, where factors such as public transportation practices, parking behavior, and weak cross-sector supervision also contribute. This means that the principal issue does not lie solely in the existence of traders, but rather in the design of infrastructure management and the transportation system, which has not yet been capable of anticipating the pressure of early-morning to morning economic activities within this mixed-use area.

The transfer of management of the former terminal land from Disdagperinkop to the Department of Transportation since October 2025, with a plan to reactivate it as a terminal to support the structuring of public transportation, was essentially intended as part of efforts to alleviate traffic congestion around Projo Market. Within the logic of transportation policy, concentrating public transport vehicles at a single terminal point is viewed as a measure to reduce arbitrary stopping practices on the roadway. However, when analyzed within the spatial context of the Projo Market area, which possesses a mixed-use functional character, this policy contains potential new risks if not designed in an integrated manner.

First, if the former terminal is genuinely reactivated as a concentration point for public transportation, public vehicles will be centralized at a node that geographically remains within the radius of market activity. Considering the intensity of the Morning Market, which involves hundreds of active traders operating within a relatively simultaneous timeframe, the existence of the terminal may in fact bring together two primary flows within a limited space: the flow of market distribution and buyers, and the flow of public transport vehicles. In such circumstances, vehicle concentration does not automatically disappear, but rather transforms from dispersed roadside stopping into queues or accumulations at the terminal point.

Second, relocation or structuring that targets only traders within the market area, as previously planned, does not automatically resolve the issue if traders outside the market fence continue to operate. Several traders outside the fence stated that they chose those locations because they are considered more strategic and provide easier access for buyers. If the former terminal is reactivated and traders in that area are pushed out without a comprehensive structuring scheme, there is a possibility that they will relocate to other points that remain along the main road corridor. Accordingly, economic activity pressure does not vanish, but shifts according to the available space.

Third, interview data indicate that congestion is not a singular issue and involves interaction among traders, public transportation vehicles, parking practices, and road user behavior. In this context, a policy focused solely on reactivating the terminal function risks being sectoral in nature if not accompanied by simultaneous regulation of roadside parking, loading and unloading points, and consistent supervision of vehicle stopping duration. Without cross-sector integration, partial spatial restructuring may instead create new congestion patterns around terminal entry and exit access points.

This confirms that area structuring has not yet been fully based on an integrated planning approach, but rather remains within a sectoral framework that separates trade affairs and transportation affairs.

If examined from the entirety of interview findings, it appears that almost all dynamics within the Projo Market area whether related to congestion, objections to relocation, compliance with operational hours, or parking and public transport stopping practices are rooted in economic considerations. Traders choose locations considered most strategic to maintain customers and turnover, including those outside the market fence. Objections to relocation were likewise based on concerns regarding changes in buyer patterns and potential income decline.

On the other hand, the regional government also acknowledges that restricting transportation activities and conducting enforcement in the field are difficult to implement consistently because market and transportation activities are interdependent. Buyers arrive by public transport, traders depend on mobility for goods distribution, and therefore excessively rigid restrictions risk disrupting the rhythm of morning economic activity. Thus, congestion problems in the Projo Market area are not merely the result of violations or weak supervision, but rather the consequence of high economic activity pressure within limited space.

This demonstrates that economic factors constitute the dominant variable shaping the behavior of actors in the field. As long as structuring efforts are not accompanied by policy designs capable of accommodating those economic needs, resistance and informal adaptation will continue to emerge as rational societal responses.

Based on the overall analysis, the effectiveness of structuring Morning Market traders in addressing congestion problems in the Projo Market area has not yet been fully achieved. The limitations in implementation are not caused by the absence of norms, but rather by fragmented authority configurations, cross-sector coordination that has not been institutionalized

in a sustainable manner, and the dominance of economic considerations in field practice.

Based on the results of the analysis, the structuring of the Projo Market Ambarawa area requires strengthening cross-sector coordination conducted consistently and sustainably among Disdagperinkop, the Department of Transportation, and the Civil Service Police Unit. Coordination that has thus far been situational in nature needs to be upgraded into a scheduled mechanism with clear role distribution, so that the regulation of traders, parking, and public transportation activities does not operate separately according to the administrative boundaries of each agency. In addition, any relocation policy or reactivation of terminal functions must be accompanied by open and participatory policy communication and consideration of economic impacts on traders, so that policies that are administratively lawful are also socially effective. Accordingly, the effectiveness of congestion control in market areas does not depend solely on the existence of norms within the Regional Regulation, but on the integration of authority implementation and consistency of supervision in the field.

Conclusion

This study demonstrates that Regional Regulation of Semarang Regency Number 9 of 2024 concerning the Establishment, Structuring, and Development of People's Markets has normatively provided adequate legal instruments to regulate the existence and operation of Morning Market traders at Projo Market Ambarawa. The implementation of the Regional Regulation has functioned relatively effectively with respect to traders located within the market area who possess a Trader Identity Card (KIP), through mechanisms of trader identification, limitation of operational hours, and administrative

monitoring by the authorized regional apparatus. Nevertheless, such effectiveness remains limited because Morning Market economic activities factually extend beyond the market fence and fall within a fragmented domain of authority shared among the trade office, the transportation office, the Civil Service Police Unit, and private land managers. This condition causes the norms of the Regional Regulation to operate within their own sectoral boundaries and prevents their comprehensive integration into overall area management.

In terms of effectiveness in addressing congestion problems, this study finds that traffic density surrounding Projo Market is not solely caused by the presence of Morning Market traders, but rather by the simultaneous interaction among the concentration of economic activities at specific hours, roadside parking practices, the stopping of public transportation vehicles outside designated points, and weak cross-sector coordination in area supervision. Accordingly, the principal issue lies in the configuration of governance authority and coordination mechanisms that have not yet been institutionalized in a sustainable manner, rather than in the absence of regulation.

From an applicative perspective, these findings underscore the necessity of strengthening consistent and scheduled cross-sector coordination mechanisms among relevant regional apparatuses in structuring the Projo Market area, accompanied by participatory policy communication in every relocation plan or reactivation of terminal functions. The integration of authority implementation, consistency of supervision, and sensitivity to local economic dynamics constitute essential prerequisites to ensure that structuring policies are not only normatively valid but also effective in controlling congestion within areas experiencing high economic activity pressure.

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