

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 indicates that traffic-related problems are not only associated with the increase in vehicle volume, but also with the governance of trading activities and the use of road space. This study aims to analyze the implementation of the Regional Regulation of Semarang Regency Number 9 of 2024 concerning the Establishment, Arrangement, and Development of People's Markets, Shopping Centers, and Modern Retail Stores in the regulation of Morning Market traders, as well as to assess its effectiveness in addressing congestion issues in the market area. This research employs an empirical juridical method with a statutory approach, supported by primary data through the analysis of regional regulations, statutory laws and regulations, interviews, and field observations, as well as secondary data in the form of relevant literature. The results of the study indicate that the implementation of the Regional Regulation has been carried out administratively for traders within the market area through mechanisms of trader designation, issuance of Trader Identification Cards (KIP), regulation of trading facilities, and



restriction of operating hours. However, in practice, Morning Market trading activities extend beyond the market area and involve various parties and sectoral authorities. This condition indicates that the exercise of authority tends to be understood as limited to the aspect of area management, such that the regulatory and enforcement functions have not fully encompassed all trading activities. As a result, the arrangement of Morning Market traders has not been fully effective in addressing congestion, as the existing problems arise from the interaction between economic activities, parking, and the movement of public transportation within the same spatial area. This study concludes that the main issue does not lie in the absence of norms, but rather in the implementation of authority that has not yet been integrated, particularly in distinguishing between management functions and regulatory enforcement.

KEYWORDS

Implementation of Regional Regulation, Market Traders, State Administrative Law, Congestion in Market Areas.

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.

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>.

Furthermore, Article 43 provides that parking facilities shall, in principle, 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.

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>.

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

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

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, "Problematisa 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/jiwbpp.v12i1.2482>.

consistency, the basis of authority, and the administrative prudence underlying such actions.⁷

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

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>.

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-arrah-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>.

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 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

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>.

suggests that there remains room to further examine how market regulation 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/fvo7ty56>.

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 method, namely research that examines applicable legal provisions as well as their implementation in practice within society.²¹ This research does not only examine the norms contained in the Regional Regulation of Semarang Regency Number 9 of 2024, but also analyzes how such regulation is implemented in the arrangement of Morning Market traders at Projo Ambarawa Market. The approach method used is a statutory approach. The research was conducted in the Projo Ambarawa Market area, Semarang Regency. The data used consist of primary data and legal materials, as well as secondary data. Primary data were obtained through interviews with the Department of Trade of Semarang Regency and Morning Market traders, as well as direct observation of the conditions of trader arrangement and traffic around the market.²² Primary legal materials consist of the Regional Regulation of Semarang Regency Number 9 of 2024 and the Law on Road Traffic and Transportation. Secondary data include books and scientific 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.

Result and Discussion

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.

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 regulated under the Regional Regulation of Semarang Regency Number 9 of 2024, particularly Article 1 point 13, which defines a Morning Market as a market operating from early dawn until morning, as well as Article 5 paragraph (1), which classifies People's Markets into Main Markets and Morning Markets. This provision mandates that the Regional Government is obliged to manage and organize Morning Market activities as part of the people's market system. In its implementation, the regional government through the relevant agency has designated Projo Ambarawa Market as a people's market that accommodates Morning Market activities and facilitates early morning trading within market management.

Under the Regional Regulation of Semarang Regency Number 9 of 2024, Article 1 point 20 stipulates that a Trading Space or *oprokan* constitutes a trading facility provided within the market outside kiosks and stalls. Furthermore, Article 17 paragraph (2) mandates that every trader occupying such facilities must be officially designated by the regional government or regional apparatus and evidenced by ownership of a Trader Identification Card (KIP), which is valid for one year as regulated under Article 18 paragraph (2). This mandate indicates that the regional government is obliged to conduct data collection, designation, and control of *oprokan* traders through formal administrative mechanisms. In its implementation, the regional government through the relevant agency has conducted data collection and issued KIP to traders within the market area, including *oprokan* traders, thereby ensuring that trading activities within the market fall under an official management system. This is further reinforced based on the results of an interview dated 20 February 2026 with Mr. KZM, a Functional Trade Analyst in the Market and Street Vendors

Division of the Department of Trade, Industry, and Cooperatives of Semarang Regency, who stated that all Morning Market traders within the market area, including *oprokan* traders, have been registered and possess KIP, totaling 401 *oprokan* traders, consisting of 316 active and 85 inactive traders, thereby demonstrating that the administrative trader designation mechanism has been implemented. Supervision is carried out through periodic monitoring approximately once a week.

Under the Regional Regulation of Semarang Regency Number 9 of 2024, Article 19 paragraph (2) limits the use of Trading Space or *oprokan* to a maximum area of 2 m² per trader. This provision contains a mandate that the regional government must control the size of trading spaces to prevent expansion that may disrupt the orderliness of market space. In its implementation, such limitation is applied through the arrangement of trading spaces within the market area in accordance with the size determined by the Regional Regulation.

In addition, Article 21 paragraph (2) of the Regional Regulation of Semarang Regency Number 9 of 2024 stipulates that the operational hours of the Morning Market are limited from 00.00 WIB until no later than 07.00 WIB, thereby emphasizing that trading activities must be time-restricted to reduce impacts on the surrounding environment, including traffic. The Regional Regulation, through Article 21 paragraph (4), also grants authority to the Regent to determine operational hours outside such provisions by considering certain conditions, such that changes in operational hours should be based on official policy rather than sporadic practices occurring in the field. In its implementation, trading activities within the market have generally complied with such time limits, as reinforced from the perspective of compliance based on an interview dated 17 February 2026 with an *oprokan* trader with the initial Z, who stated that certain traders have adjusted their operational hours in accordance with the provisions, namely trading from 03.00 WIB and ceasing before 07.00 WIB. Nevertheless, not all traders demonstrate the same level of compliance, as in practice there

are still traders operating beyond 07.00 WIB, thereby contributing to traffic congestion during peak morning hours.

In practice, the activities of Morning Market traders in the Projo Ambarawa Market area are not only concentrated within the market area but are also dispersed across several points outside the market area, namely in the former CPM area (private land), the former terminal area, as well as on road bodies and sidewalks along the front of the market, including the Kupang Kidul route. This condition indicates that, in factual terms, the spatial scope of Morning Market activities extends beyond the administrative boundaries of the officially managed market area.

Normatively, Article 4 of the Regional Regulation of Semarang Regency Number 9 of 2024 allows for market management to be carried out by various parties, including the regional government, private entities, and Village-Owned Enterprises (BUMDes). However, Article 14 paragraph (1) emphasizes that the responsibility for order and security of People's Markets lies with the Regional Apparatus administering governmental affairs in the trade sector, and Article 17 regulates that trader designation and the issuance of KIP are carried out by such regional apparatus. These provisions indicate that although market management may involve various parties, the functions of regulation, arrangement, and supervision remain within the framework of the regional government's authority.

In its implementation, based on the results of an interview dated 20 February 2026 with Mr. KZM, a Functional Trade Analyst in the Market and Street Vendors Division of the Department of Trade, Industry, and Cooperatives of Semarang Regency, it was found that the authority of Disdagperinkop is, in practice, more focused on traders within the market area. Meanwhile, trading activities outside the market area, such as in the former CPM land managed by private parties, the former terminal whose authority has been returned to the transportation agency since October 2025, as well as road bodies and sidewalks under the authority of the

transportation agency, in practice involve the authority of other sectors as well as non-governmental parties.

This condition indicates the existence of a division of roles in authority in the management of space and trading activities around the market area. In this context, although trading activities outside the market area are not entirely under the direct administrative management of the regional apparatus in the trade sector, substantively such activities remain related to the dynamics of the Morning Market as a unified economic activity within the Semarang Regency area. Therefore, a comprehensive understanding is required regarding the distinction between management functions and regulatory functions, as well as the importance of cross-sectoral coordination in the exercise of regional governmental authority.

As an implication, traders operating outside the market area are not entirely covered by the trader designation mechanism through KIP as regulated under Article 17, and are not fully bound by the limitation of operational hours under Article 21 paragraph (2). In practice, trading activities outside the market area still continue until 09.00–10.00 WIB, indicating that the implementation of time limitation provisions has not been comprehensively applied to all Morning Market activities.

Thus, the implementation of the Regional Regulation of Semarang Regency Number 9 of 2024 in the arrangement of Morning Market traders has not been fully optimal, particularly due to the interconnection between trading activity spaces involving various actors and sectoral authorities. This indicates that the effectiveness of regulation is not only determined by the existence of norms, but also by the coordination and integration of the exercise of authority among relevant institutions.

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

Within the framework of the exercise of regional governmental authority, although Projo Market is not situated within a condition of vertical conflict of authority between the central and regional governments, the emerging dynamics indicate the existence of a division of roles in

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 Yuni 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>.

authority among regional apparatuses as well as the involvement of private parties in the management of the market area. This condition does not necessarily indicate the existence of a vacuum of authority, but rather reflects a separation between management functions and regulatory functions which, in practice, have not been fully integrated. As a result, the exercise of authority tends to operate in accordance with the respective institutional boundaries, such that the regulation of Morning Market activities, which are factually dispersed across various spaces, has not fully encompassed all existing activities.

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

Thus, based on the overall description, it can be understood that the implementation of the Regional Regulation of Semarang Regency Number 9 of 2024 in the arrangement of Morning Market traders at Projo Ambarawa Market, from a normative perspective, already possesses a clear regulatory

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>.

framework, both in terms of trader designation, regulation of trading facilities, and limitation of operational hours. However, in practice, such implementation has not been fully optimal, as trading activities factually extend beyond the boundaries of the market area and involve various actors as well as sectoral authorities. This condition indicates that the main issue does not lie in the absence of norms, but rather in the exercise of authority that has not yet been optimally integrated, particularly in terms of cross-sectoral coordination and the understanding of the distinction between management functions and regulatory functions. Therefore, the effectiveness of the arrangement of Morning Market traders is not solely determined by the existence of the Regional Regulation as a normative instrument, but also by the capability of the regional government to coordinate the exercise of authority comprehensively across all spaces of trading activities related to the Morning Market.

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

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>.

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 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

²⁸ Firdaus Arifin and Harri Tri Ramdhani, "Rekonsseptualisasi 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>.

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>.

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 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, the Regional Regulation of Semarang Regency Number 9 of 2024 provides a legal basis for the Regional Government to carry out the arrangement and development of trading activities in People's Markets, including the Morning Market. Within its regulatory construction, such authority is exercised through regional apparatuses responsible for trade affairs, which encompass not only aspects of market area management, but also regulatory functions, arrangement, and enforcement of provisions concerning trading activities. However, in practice, the exercise of such authority tends to be understood and implemented within the administrative boundaries of market area management, namely only with respect to traders located within the market premises.

Based on the results of an interview conducted on 20 February 2026 with Mr. KZM as a Functional Trade Analyst in the Market and Street Vendors Division of the Department of Trade, it was found that the direct authority of Disdagperinkop is focused on traders within the market area who possess KIP, while traders outside the market area, such as those in the former terminal area, former CPM land, as well as sidewalks and road bodies, are considered to fall under the authority of other sectors or non-governmental parties. This finding is consistent with the results of interviews with Morning Market traders outside the market area on 17 February 2026, which indicate that traders in the former CPM area and the Kupang Kidul route are not registered in the market administrative system, do not possess KIP, and make stall payments to non-governmental

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>.

managers such as private parties or local associations. This condition indicates that, in practice, there is a separation between the function of area management and the functions of regulation and enforcement of provisions, whereby authority is perceived as limited to spaces that are directly managed. In substance, however, such trading activities remain part of the dynamics of the Morning Market within the territory of Semarang Regency, and thus normatively remain within the regulatory framework of the Regional Regulation.

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 this context, the lack of clarity in distinguishing between management functions and regulatory functions has implications for the limited scope of enforcement of the provisions of the Regional Regulation in practice. In the practice of arranging the Projo Market area, cross-sectoral coordination is indeed carried out at certain moments, such as prior to major holidays, but has not yet been established as a systematic and sustainable collaborative mechanism. As a result, market regulations which are normatively comprehensive are more effectively implemented within spaces under the direct management of regional apparatuses, while activities outside the market area that also contribute to congestion have not been fully encompassed by integrated regulatory and enforcement mechanisms.

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

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

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

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

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>.

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 (2016): 55, <https://doi.org/10.26858/jiap.v6i2.2558>.

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 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

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>.

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. 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 description, it can be understood that the arrangement of Morning Market traders in the Projo Ambarawa Market area has not been fully effective in addressing congestion issues. This is not merely caused by the presence of traders or the behavior of road users in isolation, but rather by the lack of integration in the exercise of authority between the function of market management and the functions of regulation and enforcement in the fields of traffic and public order. As a result, trading activities and vehicle movements take place within the same space and time without integrated control, such that the arrangement efforts undertaken

remain partial in nature and have not yet been able to comprehensively alleviate congestion in the area.

Conclusion

Based on the results of the research, the implementation of the Regional Regulation of Semarang Regency Number 9 of 2024 in the arrangement of Morning Market traders at Projo Ambarawa Market, from a normative perspective, has been carried out through mechanisms of trader designation, regulation of trading facilities, and clear limitations on operational hours, particularly for traders located within the market area and registered in the Trader Identification Card (KIP) system. However, in practice, such implementation has not been fully optimal, as Morning Market activities factually extend beyond the market area, encompassing private land, former terminal areas, as well as road bodies and sidewalks. This condition indicates that the exercise of regional governmental authority still tends to be limited to the administrative aspect of area management, such that the functions of regulation and enforcement have not fully encompassed all trading activities which, in substance, form part of the Morning Market.

The arrangement of Morning Market traders in the Projo Ambarawa Market area has not been fully effective in addressing congestion issues. This is caused by the cross-sectoral nature of the problem, which involves the interaction between trading activities, parking, and the movement of public transportation within the same space and time. In addition, the lack of integration in the exercise of authority between the function of market management and the functions of regulation and enforcement in the fields of traffic and public order has resulted in area control being carried out in a partial manner. As a result, although regulations are in place, trading activities and vehicle movements continue without integrated control, such that congestion still occurs during Morning Market peak hours.

The regional government needs to strengthen the implementation of the Regional Regulation of Semarang Regency Number 9 of 2024 through the reinforcement of regulatory and enforcement functions over all Morning Market activities, not limited to traders located within the market area. The arrangement needs to be based on an activity-based approach, such that traders outside the market area who, in fact, form part of the Morning Market ecosystem can still be encompassed within supervision and enforcement mechanisms. In addition, it is necessary to strengthen a consistent enforcement system with respect to provisions on operational hours, the use of road bodies, as well as parking practices and the stopping of public transportation, through continuous and non-incidental supervisory measures. Thus, the arrangement of the area does not merely depend on aspects of administrative management, but is also capable of creating legal certainty and spatial order through integrated enforcement of regulations.

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