

Conversion Option on the Implementation of Balanced Occupation Concept Within the Framework of Government Regulation in Lieu of Law of the Republic of Indonesia Number 02 of 2022 Concerning Job Creation

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Abstract

By issuing it and displaying regulations related to the concept of balanced housing, the criteria for implementing balanced development have also changed. The publication of the Perppu Ciptaker and its derivative regulations, namely PP No. 12 of 2021 relating to implementation and residential areas, provides another alternative for developers who cannot construct simple houses or flats with conversions in the form of funds for the construction of public houses. The research method to be used is the normative juridical qualitative method. A new alternative for developers is regulated through Perppu Ciptaker, namely, payment of conversion funds for the construction of public houses. Housing with balanced housing is built utilizing conversion funds as an alternative to the requirement to build subsidized simple housing. These funds can be managed or come in the form of grants from development actors. A fee is assessed to the Agency for the Acceleration of Housing Implementation (AHIC) for the conversion (BP3). To speed up the delivery of inexpensive public housing for working class individuals, the federal government established BP3. Land is provided, simple houses and public flats are built, infrastructure, services, and public utilities are developed, and housing is managed and invested using the money BP3 receives..

I. Introduction

Shelter is one of humanity's most fundamental requirements, serving as a safe haven to sleep and recharge to carry on with daily life. Following Article 28H of the Constitution of the Republic of Indonesia from 1945, all Indonesians shall be guaranteed the right to a safe and secure dwelling to raise their families and pursue their individual and collective pursuits of material and spiritual well-being. The Central Statistical Agency (BPS) estimates that 80.07 percent of

Indonesian households own their dwellings as of 2019; the other 20 percent may be living in temporary housing, with relatives, or elsewhere.¹ For the first time, the concept of balanced housing was pursued with the Joint Decree of the Minister of Home Affairs, Minister of Public Works, and Minister of Public Housing Number 648-384 of 1992, 739/KPTS/1992, 09/KPTS/1992 regarding Guidelines for the Development of Housing in Indonesia, to provide a safe and comfortable environment for all Indonesians (SKB 3 Ministers). One of the main reasons for the presence of well-rounded housing is to foster the growth of resilient individuals, families, and communities.² Law 1 of 2011 pertaining to homes and residential areas, as well as any and all derived regulations. After promulgating Law No. 11 of 2020 Concerning Job Creation (Job Creation Law), which has since been repealed and replaced with Government Regulation instead of Law of the Republic of Indonesia No. 02 of 2022 Concerning Job Creation, the government has once again amended the concept to achieve the goals of a balanced residential concept (Perppu Ciptaker). Article 184 of the Ciptaker Perppu states that all regulations adopted under the Job Creation Law should continue in effect to the extent that they do not contradict it.

To comply with Article 34 of Law Number 1 of 2011 concerning Housing and Settlement Areas (UU No. 1 of 2011) and Article 21 Paragraph (1) of Government Regulation of the Republic of Indonesia Number 12 of 2021 concerning Amendments to Government Regulation Number 14 of 2016 concerning Housing Management and Residential Areas, legal entities involved in housing construction must realize housing with balanced occupancies (PP No. 12 of 2021). The developer is the practical equivalent of the legal entity in this case.

The concept of "balanced housing" calls for a 3:1:1 ratio of starter homes, mid-range properties, and high-end mansions. Article 21F of PP No. 12 of 2021, as amended by Article 9 of Regulation of the Minister of Public Housing of the Republic of Indonesia No. 10 of 2012 on the Implementation of Housing and Residential Areas with Balanced Occupation, makes this clear.³ This comparison means that in building one luxury house, the developer must balance it with two medium-sized houses and three simple houses in one stretch or not in one stretch but in one district/city area.⁴ However, in practice, the implementation development with such a comparison is difficult for developers to implement, partly because of limited land, especially in urban areas. Most of the existing urban land is controlled by other large developers and the designation is not for residential use and this also makes it difficult for developers who want to build subsidized housing because the price of land in urban areas is unaffordable.⁵ The

¹ Giri Hartono, 2020

² Fattah Hanurawan, 2015: 07

³ Permenpera No. 10 of 2012

⁴ Erni Herawati, 2018

⁵ Rizkie Fauzan, 2021

publication of this and updated regulations relating to the concept of balanced housing resulted in changes in the criteria for implementing balanced housing. With the release of Perppu Ciptaker and its related regulations, PP No. 12 of 2021, which deals with the implementation of housing and residential areas, developers who can't build simple houses or flats with conversions in the form of funds for the construction of public houses have another option. So, in this paper, the author will talk about the criteria for balanced housing from the past to the present, as well as conversion options in the form of funds for building public houses in the concept of balanced housing.

2. Research Method

The research method that will be used is the normative juridical method, which is qualitative. This method focuses on problems that occur in practice where laws and regulations are interrelated to obtain a description of the problem. This study relies on secondary data, specifically main and secondary legal sources. Library research was used as the method of data collecting (Library Study). Libraries were searched for relevant documents, rules and regulations, books, seminar materials, and newspapers in order to acquire the necessary information for the study.

3. Results and Discussion

Balanced occupancy criteria from time to time to date

Over time, expanded and refined criteria for balanced housing have emerged. More so now, with the implementation of the Perppu Ciptaker and other legislation concerning the administration of housing and residential zones. Because of this, "balanced housing" regulations have been updated. Housing and residential areas that are built with a specific mix of single houses and row houses between simple houses, medium-sized houses, and luxury houses, or in the form of flats between public flats and commercial flats, or in the form of landed houses and public flats are considered to be "balanced housing" under Article 1 point 1 of the Regulation of the Minister of Public Housing of the Republic of Indonesia Number 7 of 2004.⁶ An additional definition of "balanced housing" can be found in Article 1 point 8 of PP No. 12 of 2021. Housing or residential areas are defined as "balanced" if they feature a healthy mix of low-, medium-, and high-end dwellings. Housing is one of the most fundamental human needs, and the development of housing and settlements aims to address that need while also providing a direction for regional expansion and providing support for development in the economic, social, cultural, and other spheres. in the context of improving people's lives and creating a more equitable society in accordance with Pancasila so that everyone can flourish.⁷

⁶ Permenpera No. 7 of 2013

⁷ Benny Djaja, 2020: 67

Over time, expanded and refined criteria for balanced housing have emerged. More so now, with the implementation of the Perppu Ciptaker and other legislation concerning the administration of housing and residential zones. Because of this, "balanced housing" regulations have been updated. Article 1 point 1 of the Regulation of the Minister of Public Housing of the Republic of Indonesia Number 7 of 2004 defines "balanced housing" as the development of neighborhoods with a mix of different types of dwellings, such as single-family homes, row houses, public flats, commercial flats, and landed houses.⁸ Balanced housing is also defined in a different way in Article 1 point 8 of PP No. 12 of 2021. Housing or neighborhoods that have a variety of different dwelling types, from starter homes to mansions, are described as "balanced." Housing is one of the most fundamental human needs, and the development of housing and settlements aims to address that need while also providing a direction for regional expansion and providing support for development in the economic, social, cultural, and other spheres. in the spirit of making people's lives better and more equitable so that Pancasila might bring about a fair and successful society for all.⁹

According to Article 1 paragraph (3) SKB 3 Ministers, the developer must initially construct housing that strikes a fair balance between the number of simple houses, medium-sized houses, and luxury houses, with a corresponding ratio of six or more simple houses to three or more medium-sized houses to one luxury house. In 1990, a Joint Decree of Three Ministers (Minister of Home Affairs, Minister of Public Works, and Minister of Public Housing) mandated a 1:3:6 Balanced Residential Environment (LHB) model, which was later shown to be unworkable.¹⁰ After the publication of Permenpera No. 10 of 2012, as revised by Permenpera No. 7 of 2013, the SKB 3 Ministers were nullified and proclaimed void. Article 9 of the Permenpera specifies that the ratio of the number of simple dwellings to the number of medium-sized houses to the number of luxury houses must be altered to reflect this new reality.

In terms of the legislated requirements for modest homes, standard-sized homes, and mansions, Formerly, the SKB 3 Ministers' Article 1 paragraph (4) specified that the standards for modest dwellings, medium-sized houses, and opulent mansions were established by the area of the land.

- a. a "basic house" is a dwelling that has a yard between 54 and 200 square meters in size.
- b. a medium-sized house is one that occupies a lot between 200 and 600 square meters in size.
- c. a luxury home is a residence situated on a property measuring between 600 and 2000 square meters.

⁸ Permenpera No. 7 of 2013

⁹ Benny Djaja, 2020: 67

¹⁰ Juarni Anita, 2021:09

After that, ²⁴ article 1 paragraph (5) through article 1 paragraph (7) of Permenpera No. 7 of 2013 regulated that: the criteria for simple, medium, and elegant dwellings shall be set depending on the selling price.

- a. ³ a public house that is built on land and has a floor size and selling price that comply with government rules is called a "simple house."
- b. a medium house (also known as a commercial house) has a price tag that's at least one-to-six-times higher than that of a modest home.
- c. a commercial house is considered to be luxurious if its asking price is more than six times that of a modest dwelling.

Then, under Article 21E PP No. 12 of 2021, a derivative rule from Perppu Ciptaker, the criteria for inexpensive homes, moderately priced homes, and high-end homes were updated according to their selling prices.

- a. when compared to the government-mandated price for a public dwelling, a luxury home's asking price is at least fifteen times more.
- b. the price of a medium-sized home is anywhere from three to fifteen times that of a government-subsidized home.
- c. a "simple house," as defined by the law, is a single-family residence that has been constructed on a lot and is priced in accordance with its square footage and location.

According to article 6 paragraph (3) of Permenpera No. 10 of 2012, multiple scales are recognized in the building of housing and residential areas with balanced occupancy carried out in housing, settlements, residential neighborhoods, and residential areas.

- a. housing with at least fifty to one thousand houses;
- b. settlements with at least one thousand to three thousand houses;
- c. residential neighborhoods with at least three thousand to ten thousand houses; And
- d. residential area with more than ten thousand houses.

By issuing Permenpera No. 7 of 2013, the terms of Article 6 paragraph (3) have been further revised as follows:

- a. housing with at least fifteen to one thousand houses;
- b. settlements with at least one thousand to three thousand houses;
- c. residential neighborhoods with at least three thousand to ten thousand houses; And
- d. residential area with more than ten thousand houses.

The provisions regarding ¹⁵ the scale of housing construction and residential areas with balanced occupancy are renewed to become large-scale housing and non-large-scale housing as stipulated in article 21B of PP No. 12 of ²⁵ 2021, which was issued as part of Perppu Ciptaker and its derivative regulations in the field of managing housing and residential areas. Groups of homes with fewer than three thousand units are considered large-scale housing, while groups with

between one hundred and three thousand units are considered to be non-large-scale housing.

In addition, PP No. 12 of 2021 has been updated to provide the following information required by Article 21F paragraph (2) with respect to the ratio of high-end to medium-range to low-end homes built in non-mass housing projects:

- a. one mansion vs two or three cottages, or two or three bungalows, or three or more modest homes;
- b. a mansion costs as much as three modest homes combined; or
- c. Two average-sized homes to at least three small ones.

In addition, PP No. 12 of 2021 introduces new regulations for the previously unregulated concept of balanced occupancy in the context of basic residences, which are now classified as either subsidized or unsubsidized.¹¹ Article 21F, subsection 3, of Presidential Proclamation No. 12 of 2021 specifies the following ingredients:

- a. large urban areas, the composition of simple houses is 75% (seventy five percent) non-subsidized simple houses and 25% (twenty five percent) subsidized simple houses;
- b. medium urban areas, the composition of simple houses is 50% (fifty percent) non-subsidized simple houses and 50% (fifty percent) subsidized simple houses;
- c. small urban areas, the composition of simple houses is 25% (twenty five percent) non-subsidized simple houses and 75% (seventy five percent) subsidized simple houses.

Application of the conversion option to the concept of balanced housing after the promulgation of Law Number 11 of 2020 concerning Job Creation

According to Article 34 paragraph (2) of Law no. 1 of 2011 juncto Article 21D paragraph (2) letter a PP No. 12 of 2021 juncto Article 5 Permenpera No. 10 of 2012, the developer's development must realize balanced housing in one stretch. According to Article 50 of the Ciptaker Perppu, which modifies the provisions of Articles 36 of Law No..1 of 2011 and 21D paragraph (2) letter b of PP No. 12 of 2021 and Article 7 of Permenpera No. 10 of 2012, developments that are not carried out in a single stretch and the construction of public housing must be carried out in 1 (one) district/city area and must have access to a service center or workplace.

Realizing housing with balanced occupancy in accordance with the provisions stipulated by laws and regulations is challenging for developers. The limited land, the difficulty of obtaining property, and the high price of land are the arguments that have been constructed by development actors that continue to be

¹¹ Adi Guru Mahendra, 2021

expressed again.¹² Building homes for a balanced population in one continuous development is challenging because large suitable plots of land are uncommon. Additionally, in the case of balanced occupancy housing building, it is also possible to carry it out not in a single stretch but in a single district/city area. In addition, the developer must pay a premium price because a vast plot of land is needed to construct a home that can accommodate a balanced occupancy. Given that land on the outskirts of the city is still very inexpensive for small and medium-sized developers, meeting the rules for the comparison of the number of dwellings in balanced housing should not be too difficult.¹³

Developers who are unable to construct single-family homes or row houses due to zoning restrictions are given alternatives in the form of payment of conversion funds for the construction of public houses through Perppu Ciptaker and its derivative regulations in the field of housing and residential area administration, namely PP No. 12 of 2021. Article 50 of the Ciptaker Perppu, which amends Section 36 of Act No. 1 of 2011 and Section 21G of Act No. 12 of 2021, governs this provision. Housing with balanced occupancy is built with Conversion Funds, which are managed fund contributions or grant money received from development players in place of the requirement to build subsidized simple residences.¹⁴ Before the passing of the Perppu Ciptaker, developers who were unable to construct single-family homes or row houses had the option of converting the land into public flats. This adjustment might be made in accordance with the required density of dwelling units or the market value of modest homes on the same site.¹⁵

Funds for conversion are decided using a formula the minister establishes, taking into account the factors listed in Article 21G paragraph (3) of PP No. 12 of 2021.

- a. simple house liability amount;
- b. the selling price of subsidized simple houses determined by the Central Government in accordance with the provisions of the laws and regulations;
- c. the percentage of the cost of production to the selling price;
- d. the multiplier factor taking into account the time value of money which is determined further by the minister; And
- e. management fee fund which is determined further by the minister.

The Agency for the Acceleration of Housing Implementation receives the conversion funds (BP3). According to article 1 number 1 of Presidential Regulation Number 9 of 2021 about the Agency for the Acceleration of Housing

¹² Muhammad Ilham Hermawan & Febri Mutia, 2023: 159

¹³ Nadima Ramadhila & Agus Budi, 2022: 02

¹⁴ Article 1 number 9 PP No. 12 of 2021 Juncto Presidential Regulation Number 9 of 2021 concerning the Agency for the Acceleration of Housing Implementation

¹⁵ Sri Maharani, 2015:44

Implementation, the government established BP3 to speed up the delivery of excellent and affordable public housing for low-income people.¹⁶ The Presidential Regulation mandating BP3's creation aims to speed up the delivery of public housing, guarantee that only public houses are owned and inhabited by Low-Income Communities (MBR), realize the principles of public housing's benefits, and put into effect a range of policies pertaining to public housing and special housing. The three parts of BP3 are oversight, management, and execution by the Executing Agency (supervisory board). In accordance with article 50 of the Ciptaker Perppu, which supplements Law no. 1 of 2011 by adding Chapter IXA (consisting of Articles 117A and 117B), the DPR appoints five (5) members to serve on the supervisory board. Board members include the Minister of Finance, the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency, and the Minister of Home Affairs, in addition to the Minister of Public Works and Public Housing (who also acts as the board's chairman). The Implementing Agency is led by a Director and may have up to three additional Directors. The five-person Supervisory Board includes representatives from relevant government agencies, academic institutions, trade groups, builders, and members of the local community. Presidential Regulation No. 9 of 2021 further regulates BP3's structure, membership, and jurisdiction in articles 6 through 17. This new organization will control and use the converted monies to build homes for people.¹⁷ Before BP3 will issue the Building Permission, the developer must submit the conversion fund computation (PBG). The money has to be handed over between when the PBG is issued and when the COF is issued. According to Article 55 of Presidential Decree No. 9 for the Year 2021, all funds received by BP3 must be utilized for the provision of land, the construction of simple dwellings and public flats, the construction of infrastructure, facilities, and public utilities, housing management, and investment.

4. Conclusion

Based on the discussion that has been described by the authors above, it can be concluded that the concept of balanced housing continues to develop from time to time. With the issuance of the Perppu Ciptaker and its derivative regulations relating to the management of housing and residential areas, several provisions related to balanced housing have been amended. The changes are broadly related to a number of things, such as the comparison of the number of luxury houses, medium-sized houses, and modest houses, the criteria for simple houses, medium-sized houses, and luxury houses, the scale of housing development and residential areas with balanced occupancy, the current

¹⁶ Perpres No. 9 of 2021

¹⁷ Adi Guru Mahendra, 2021

regulation of simple houses. divided into subsidized simple houses and non-subsidized simple houses.

There are also new provisions that have not been regulated previously relating to the developer's obligation to realize balanced occupancy. Prior to the Perppu Ciptaker, for developers who could not build simple houses in the form of single houses or row houses, conversions were made in the form of public flats built in the same stretch. There is a new alternative for developers which is regulated through Perppu Ciptaker, namely payment of conversion funds for the construction of public houses as stipulated in Article 50 of Perppu Ciptaker which amends Article 36 of Law no. 1 of 2011 juncto Article 21G PP No. 12 of 2021. Calculated using the conversion calculation formula (Article 1 number 9 PP No. 12 of 2021 Juncto), the conversion funds are managed funds or grants collected from development actors in lieu of the duty to construct subsidized simple dwellings in the construction of housing with balanced occupancy. Before the enactment of the Perppu Ciptaker, the option given to developers who could not build simple houses in the form of single houses or row houses was conversion in the form of public flats built in the same stretch. The basis for calculating conversion funds is regulated in Article 21G paragraph (3) PP No. 12 of 2021. Agency for the Acceleration of Housing Implementation receives the conversion funding (BP3). The federal government established BP3 to hasten the delivery of quality, low-cost public housing for those with limited financial resources. Land is provided, basic homes and public apartments are built, public infrastructure, facilities, and utilities are built, and housing is managed and invested in with the money BP3 receives.

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