

Legal Protection of Community Land Rights in Land Acquisition for National Strategic Projects

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ABSTRACT

Land acquisition for National Strategic Projects (PSN) creates a legal tension between the State's interest in accelerating national development and the need to protect community land rights. This study examines the regulatory framework governing land acquisition for National Strategic Projects and the legal protection afforded to community land rights under Indonesian positive law. It employs normative legal research using library-based research and a statutory approach, with the analysis grounded in Gustav Radbruch's Theory of Legal Certainty and Philipus M. Hadjon's Theory of Legal Protection. The findings show that the regulatory framework, comprising the 1945 Constitution, the Basic Agrarian Law, Law Number 2 of 2012, and Government Regulation Number 19 of 2021 as amended by Government Regulation Number 39 of 2023, provides a legal basis for land acquisition while constraining the exercise of State authority through requirements of legal certainty and the protection of community rights. Legal protection operates preventively through information disclosure, participation, identification, inventory, and deliberation, and repressively through objection and dispute-resolution mechanisms. The novelty of this study lies in conceptualizing the relationship between accelerated development and multilayered legal protection of community land rights in the implementation of National Strategic Projects.

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Keywords:

Legal protection;
National Strategic
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INTRODUCTION

Land is a fundamental resource for human life and occupies a strategic position in the social, economic, political, and legal dimensions of society. From the perspective of Indonesia's national agrarian law, land is not merely an asset with economic value; it is also the space in which individuals live, establish residences, conduct economic activities, and sustain social and cultural life (Ichwan et al., 2026). This understanding is constitutionally grounded in Article 33 paragraph (3) of the 1945 Constitution of the Republic of Indonesia, which stipulates that the earth, water, and natural resources contained therein are controlled by the State and shall be utilized for the greatest prosperity of the people. The constitutional mandate is further elaborated in Law Number 5 of 1960 concerning Basic Agrarian Regulations (the Basic Agrarian Law/UUPA), which treats land as an integral component of agrarian resources whose control and utilization must be directed toward social welfare and justice. Accordingly, every state policy concerning the control, utilization, and transfer of land rights must balance development interests with the protection of communities that hold or control land (Hartana, 2019).

Demand for land has continued to increase alongside population growth, the expansion of economic activities, urbanization, and the growing need for national infrastructure. The State therefore requires land in specific quantities and locations for the construction of toll roads, airports, ports, dams, industrial areas, transportation systems, energy facilities, and other infrastructure considered essential to economic

growth and the equitable distribution of development. This pressure has become particularly evident with the development of the National Strategic Projects policy, a government instrument designed to accelerate the provision of priority infrastructure and other projects of strategic importance to the economy, public services, and national development. In principle, National Strategic Projects are intended to accelerate the achievement of national development objectives by providing policy support and expediting the implementation of priority projects.

As the number and scope of National Strategic Projects increase, so does the need of the State and implementing parties to secure the land required for development. In this context, land acquisition is a legal instrument of central importance because it both enables the provision of land for development and constitutes a point of intersection between development objectives and the individual and communal land rights of affected communities. Law Number 2 of 2012 concerning Land Acquisition for Development in the Public Interest establishes the legal framework for land acquisition by recognizing the public interest as its basis and requiring fair and adequate compensation for entitled parties. Land acquisition therefore cannot be understood merely as an administrative process for obtaining land; it is a series of legal measures that directly affects the existence and exercise of community land rights.

At the normative level, land acquisition for the public interest is governed by principles intended to balance development interests and the protection of community rights. These include humanity, justice, utility, certainty, transparency, consensus, participation, welfare, sustainability, and harmony. Taken together, these principles demonstrate that the State does not possess unlimited authority to take or acquire community land in the name of development (Sudana et al., 2022). Rather, the State's development authority must be exercised in accordance with law, transparent procedures, public participation, and respect for land rights. Legal protection in land acquisition is therefore not limited to compensation; it also encompasses certainty regarding the status and holders of land rights, community participation at each stage of the acquisition process, access to information, opportunities to raise objections, and effective mechanisms for dispute resolution.

A legal issue arises when this framework is applied to National Strategic Projects, whose implementation is characterized by the need to accelerate development and secure the timely availability of land. From a normative legal perspective, the central question is whether expedited implementation can operate consistently with the principles that protect community land rights. This issue is significant because it requires a balance between two legally protected interests: the public interest in national development and the individual and communal interests of communities as holders of land rights. Although the State is authorized to acquire land for the public interest under applicable law, that authority remains subject to the rule of law, legal certainty, justice, and respect for rights guaranteed by legislation.

Previous studies have addressed related aspects of this issue. Krisna Angela and Anik Setyawati, in "*ANALISIS PELAKSANAAN PENGADAAN TANAH DI ATAS TANAH ULAYAT MASYARAKAT HUKUM ADAT DALAM RANGKA PROYEK STRATEGI NASIONAL (PSN) DEMI KEPENTINGAN UMUM*," examine the legal position of customary (ulayat) rights of indigenous communities in relation to National Strategic Projects and the implementation of such projects on customary land while

preserving the existence of and respect for customary law communities (Angela & Setyawati, 2022). Muhammad Irfan Aditya, Maryano, and Ahmad Yani, in "KEPASTIAN HUKUM DALAM PENGADAAN TANAH UNTUK PEMBANGUNAN PROYEK STRATEGIS NASIONAL TERKAIT GANTI KERUGIAN BAGI MASYARAKAT YANG TERDAMPAK," focus on compensation for communities affected by land acquisition for National Strategic Projects (Aditya et al., 2023). The present study differs by examining land acquisition for National Strategic Projects with particular emphasis on the relationship between accelerated development and the protection of community land rights. It analyzes not only the legal basis and mechanisms of land acquisition under Indonesian positive law but also the forms of legal protection available to communities through Gustav Radbruch's Theory of Legal Certainty and Philipus M. Hadjon's Theory of Legal Protection, particularly the preventive and repressive safeguards operating at each stage of the land acquisition process. The study is therefore directed at determining whether the regulatory framework for land acquisition in National Strategic Projects provides an adequate legal basis for protecting community rights and at identifying the forms of legal protection available under Indonesian positive law.

METHOD

This study employs normative legal research, focusing on applicable legal norms as the basis for addressing the legal issues under examination. The analysis considers relevant laws and regulations, legal principles, and legal theories. The study combines library-based research with a statutory approach. Through these approaches, written legal provisions and other relevant legal documents are examined systematically with reference to the hierarchy of laws and regulations and the applicable legal principles (Diantha, 2017).

RESULTS AND DISCUSSION

1. The Regulation Of Land Acquisition For National Strategic Projects In Relation To The Protection Of Community Land Rights

Land acquisition for National Strategic Projects must be understood within the framework of Indonesia's national agrarian law, which seeks to balance development interests with the protection of community land rights. The constitutional basis is Article 33 paragraph (3) of the 1945 Constitution of the Republic of Indonesia, which provides that the earth, water, and natural resources contained therein are controlled by the State for the greatest prosperity of the people. This provision authorizes the State to regulate the use and utilization of land for the public interest. However, that authority is not unlimited. Article 1 paragraph (3) of the 1945 Constitution expressly affirms that Indonesia is a state based on the rule of law. Consequently, any state action affecting community land rights must be based on legal authority and carried out through procedures prescribed by law (Wibawa & Yoga, 2025).

Within agrarian law, Article 2 of Law Number 5 of 1960 concerning Basic Agrarian Regulations (the Basic Agrarian Law/UUPA) elaborates this authority through the State's Right of Control (*Hak Menguasai Negara*). The State's Right of Control authorizes the State to regulate the allocation, use, availability, and maintenance of land, as well as legal relationships between persons and land. It positions the State as regulator and administrator of land affairs rather than as the owner of all land with

unrestricted authority to take community land. The exercise of this authority must be directed toward the greatest prosperity of the people. Article 6 of the UUPA further provides that all land rights have a social function, meaning that individual interests in land must take account of broader societal interests. In the context of National Strategic Projects, community-controlled land may therefore be used for development serving the public interest. Nevertheless, the social function of land does not extinguish community land rights. Article 18 of the UUPA permits the revocation of land rights for the public interest only with fair compensation. Thus, while the public interest may justify restrictions on individual land rights, such restrictions must be grounded in law and accompanied by protection for rights holders (Fernandes et al., 2022).

The specific mechanism for land acquisition is governed by Law Number 2 of 2012 concerning Land Acquisition for Development in the Public Interest, as amended and adjusted by subsequent legislation in the field of Job Creation. Article 1 point 2 defines land acquisition as an activity to provide land by granting fair and adequate compensation to entitled parties. This definition reflects two inseparable dimensions of land acquisition: it is both an instrument for providing land for development and a mechanism for protecting parties whose rights are affected. Article 2 further establishes humanity, justice, utility, certainty, transparency, consensus, participation, welfare, sustainability, and harmony as foundational principles of land acquisition. These principles provide normative parameters for assessing the acquisition of land for National Strategic Projects. Justice requires that affected communities not bear a disproportionate share of the burdens of development; legal certainty requires clarity regarding subjects, objects, procedures, and rights; and transparency and participation require access to information and meaningful opportunities to participate in the acquisition process (Butar et al., 2023).

Additional rules are contained in Government Regulation Number 42 of 2021 concerning the Facilitation of National Strategic Projects and Presidential Regulation Number 3 of 2016 concerning the Acceleration of the Implementation of National Strategic Projects, as most recently amended by Presidential Regulation Number 109 of 2020. These regulations provide facilitation and acceleration measures for National Strategic Projects, including measures related to land provision and the resolution of development-related obstacles. Such facilitation, however, cannot be interpreted as displacing the legal protection afforded to communities. Designation as a National Strategic Project establishes a special framework for development implementation, but the acquisition of land remains subject to land-acquisition law and the principles protecting community land rights. Government Regulation Number 19 of 2021 concerning the Implementation of Land Acquisition for Development in the Public Interest, as amended by Government Regulation Number 39 of 2023, further regulates the process through four stages: planning, preparation, implementation, and delivery of the results. This structure confirms that legal protection does not arise only when compensation is paid; it extends from the planning stage through completion of the acquisition process. Each stage must therefore comply with the principles of legal certainty, transparency, justice, and participation.

Under Gustav Radbruch's Theory of Legal Certainty, legal certainty is one of the three fundamental values of law, alongside justice and utility. It requires legal rules to be clear, applicable, and capable of guiding both society and government in the

exercise of rights and performance of obligations. Legal certainty enables legal subjects to ascertain their legal position, understand the limits of permissible conduct, and anticipate the legal consequences of particular actions. It therefore concerns not only the existence of laws and regulations but also the capacity of law to create order, clarity, and predictability in legal relationships (Hotta, 2024).

Radbruch's Theory of Legal Certainty is particularly relevant to land acquisition for National Strategic Projects because these projects are characterized by accelerated and facilitated development processes. Such acceleration and facilitation pursue the utility value of law insofar as National Strategic Projects are intended to advance national development, improve public services, promote economic growth, and support more equitable development. Yet the pursuit of utility cannot be separated from legal certainty. The benefits sought through National Strategic Projects must be realized within a legal framework that clearly defines governmental authority while simultaneously safeguarding the rights of communities whose land is subject to acquisition.

Legal certainty in land acquisition is firmly rooted in Indonesian positive law. Article 33 paragraph (3) of the 1945 Constitution provides the constitutional basis for State control over the earth, water, and natural resources for the greatest prosperity of the people. Law Number 5 of 1960 concerning Basic Agrarian Regulations (the Basic Agrarian Law/UUPA) further elaborates this mandate through the concept of the State's Right of Control (*Hak Menguasai Negara*). Under this concept, the State may regulate the allocation, use, availability, and maintenance of land and the legal relationships between legal subjects and land. This authority gives the State legal legitimacy to regulate and administer land affairs in pursuit of public prosperity, but it does not amount to an absolute power to take or control community land. As regulator and administrator, the State remains bound by law. From a rule-of-law perspective, every governmental action affecting community land rights must rest on clear legal authority, comply with prescribed procedures, and remain subject to legal accountability. Because land acquisition may restrict or ultimately result in the relinquishment of community land rights, the State's authority to provide land for development must remain closely tied to the principle of legal certainty.

Limits on State authority are therefore central to legal certainty. Legal certainty provides the State with clarity regarding the legal basis for acquiring land while simultaneously assuring communities of the boundaries within which State action may affect their rights. The broader the authority vested in the State to interfere with individual rights, the stronger the need for clear legal norms governing the basis, scope, procedures, and legal consequences of that authority. In land acquisition, legal certainty thus functions both as a constraint on public power and as a safeguard against arbitrary governmental action. Every step in the acquisition process must be traceable to legal authority, follow prescribed procedures, pursue clearly defined objectives, and produce identifiable legal consequences for affected communities. Law Number 2 of 2012 reinforces this dual function by treating land acquisition not only as a legal instrument for providing land for development but also as a mechanism for protecting affected rights holders. The principle of legal certainty requires certainty regarding the availability of land for development while ensuring that entitled parties receive fair and adequate compensation. Accordingly, land acquisition must serve

development objectives without compromising certainty regarding the legal position and rights of affected communities.

Legal certainty must be operationalized through clarity at every stage of the land acquisition process. Communities must receive clear information concerning acquisition procedures, the legal basis for determining the location, the status and legal position of land rights, the identification of entitled parties, the deliberation process, and the form and procedure for providing compensation. Such clarity is essential because land acquisition directly affects the possession, control, and enjoyment of community land. Where affected communities lack sufficient information about the legal basis of governmental action, applicable procedures, the status of their land rights, or the mechanisms for obtaining compensation, the legal certainty guaranteed by law cannot be regarded as fully realized. This concern is heightened in National Strategic Projects because acceleration and facilitation may intensify the tension between development objectives and rights protection. Although acceleration may be necessary for projects of strategic national importance, it must not reduce the legal safeguards available to communities. Rather, acceleration must operate within statutory limits and must not become a basis for disregarding procedures or community rights.

Accordingly, this study employs Gustav Radbruch's Theory of Legal Certainty to assess the extent to which the regulation of land acquisition for National Strategic Projects balances the State's interest in accelerated development with communities' interests in certainty and protection of their land rights. The assessment covers the legal basis of governmental authority, acquisition procedures, location determination, the status and subjects of land rights, the land constituting the object of acquisition, compensation mechanisms, and the legal remedies available when objections or disputes arise.

On this basis, regulations that facilitate and accelerate National Strategic Projects do not, in themselves, displace the principle of legal certainty. To the contrary, the stronger the demand for accelerated development, the greater the need for clear limits on State authority and clear protection of affected communities' rights. Legal certainty therefore functions not only as an instrument for facilitating orderly development but also as a juridical constraint on public power. The accelerated implementation of National Strategic Projects must remain within a legal framework that clarifies the rights and obligations of the parties, provides predictable acquisition procedures, guarantees fair and adequate compensation, and establishes mechanisms for objections and dispute resolution. Within Radbruch's framework, balancing the utility of development with legal certainty is necessary to preserve the legal legitimacy of National Strategic Projects while safeguarding community land rights.

From a rule-of-law perspective, the State's authority to acquire land for National Strategic Projects must be legally limited and must not be exercised arbitrarily. Likewise, although the social function of land permits community land rights to be restricted in the public interest, such restrictions must satisfy legal requirements and be accompanied by fair and adequate compensation. The relationship between development and rights protection is therefore one of structured balance: the public interest provides the legal justification for land acquisition, while legal certainty, justice, participation, and compensation constrain the exercise of State authority.

Taken together, Indonesian positive law provides a legal foundation for protecting community land rights in the acquisition of land for National Strategic Projects. That protection is grounded in the 1945 Constitution of the Republic of Indonesia, the Basic Agrarian Law (UUPA), Law Number 2 of 2012, Government Regulation Number 19 of 2021 as amended by Government Regulation Number 39 of 2023, and specific regulations governing National Strategic Projects. Although these projects require accelerated and facilitated implementation, such requirements do not eliminate the State's obligation to respect community rights. The regulatory framework must therefore be interpreted as balancing national development objectives with community land rights, so that accelerated development does not diminish legal certainty or justice for entitled parties.

2. Legal Protection Of Community Land Rights In Land Acquisition For National Strategic Projects

Legal protection of community land rights is an essential component of land acquisition for National Strategic Projects. Although such projects are characterized by accelerated and facilitated implementation, the acquisition process must continue to respect communities as holders of land rights or as parties otherwise entitled under the law. This protection is grounded in Article 28D paragraph (1) of the 1945 Constitution of the Republic of Indonesia, which guarantees fair legal certainty, and Article 28H paragraph (4), which guarantees private property rights and prohibits arbitrary deprivation of property. Land acquisition must therefore be conducted through lawful procedures that provide affected communities with meaningful opportunities to safeguard and assert their rights.

The legal protection framework is established by Law Number 2 of 2012 concerning Land Acquisition for Development in the Public Interest and further regulated by Government Regulation Number 19 of 2021, as amended by Government Regulation Number 39 of 2023. The process consists of planning, preparation, implementation, and delivery of the results. This staged structure demonstrates that land for development cannot be acquired summarily but must be obtained through procedures prescribed by law. During the planning and preparation stages, communities must receive information about the development plan and the location of the land to be used, and the process must include consultation and public participation. These requirements reflect the principles of transparency and participation set out in Article 2 of Law Number 2 of 2012. At the implementation stage, the subjects and objects of land acquisition are identified and inventoried. Identifying the subjects determines the parties entitled to rights or compensation, while identifying the objects determines the land subject to acquisition. The results provide the basis for determining the parties entitled to receive compensation. Clarity regarding both the subjects and objects of acquisition is therefore essential to legal certainty and the protection of community land rights (Meitadewi et al., 2025).

Community protection is also realized through deliberation over the form and amount of compensation. Article 2 of Law Number 2 of 2012 recognizes consensus as a fundamental principle of land acquisition, while Article 1 point 2 requires fair and adequate compensation for entitled parties. Compensation is a legal consequence of the relinquishment of community land rights for development purposes. Accordingly, communities should not be deprived of their land rights without compensation provided in accordance with applicable law.

When disagreements arise during the land acquisition process, or when communities consider their rights to have been adversely affected, the law provides mechanisms for objections and dispute resolution. These mechanisms allow affected communities to safeguard and assert their rights through legal procedures. Where no agreement can be reached on the amount or form of compensation, the applicable regulations may also permit compensation to be deposited with the court, subject to the requirements prescribed by law.

These safeguards may be analyzed through Philipus M. Hadjon's Theory of Legal Protection. Hadjon distinguishes between preventive and repressive legal protection (Hadjon, 1987). Preventive legal protection seeks to prevent governmental action from adversely affecting community rights, whereas repressive legal protection operates after a dispute or violation of rights has occurred (Gusmana et al., 2026). On this basis, planning, information disclosure, public consultation, community participation, identification and inventory, and deliberation constitute forms of preventive protection because they allow communities to obtain information, express their views, establish their status as entitled parties, and safeguard their interests before relinquishing land rights. By contrast, objection procedures, dispute resolution, and judicial remedies constitute forms of repressive protection because they become available when communities challenge the process or outcome of land acquisition.

From Hadjon's perspective, legal protection in land acquisition for National Strategic Projects cannot be reduced to the payment of compensation. Protection must extend from the stage preceding the designation of land as the object of acquisition through the availability of dispute-resolution mechanisms after disagreements arise. The existence of planning, participation, deliberation, and objection stages demonstrates that the law establishes a multilayered system of protection. Nevertheless, the accelerated and facilitated character of National Strategic Projects must remain within the boundaries of that system. Designation as a National Strategic Project cannot justify eliminating communities' rights to information, participation, deliberation, compensation, or legal remedies. Acceleration should therefore be understood as the expediting of lawful administrative and development procedures, not as a reduction in substantive or procedural community rights.

Accordingly, Philipus M. Hadjon's Theory of Legal Protection supports a two-part structure of legal protection for community land rights in National Strategic Projects: preventive and repressive protection. Preventive protection seeks to avert rights violations through participation, transparency, identification, inventory, and deliberation, while repressive protection provides avenues for remedies when disputes arise. This framework requires National Strategic Projects to continue recognizing affected communities as legal subjects entitled to protection and prevents accelerated development from becoming a justification for arbitrary land acquisition.

CONCLUSION

The legal framework governing land acquisition for National Strategic Projects provides the State with authority to acquire land for the public interest while also requiring the protection of community land rights. This framework is grounded in Article 33 paragraph (3), Article 28D paragraph (1), and Article 28H paragraph (4) of the 1945 Constitution of the Republic of Indonesia; Law Number 5 of 1960 concerning Basic Agrarian Regulations (the Basic Agrarian Law/UUPA); Law Number 2 of 2012

concerning Land Acquisition for Development in the Public Interest; and Government Regulation Number 19 of 2021, as amended by Government Regulation Number 39 of 2023. These provisions demonstrate that the State's authority to provide land for National Strategic Projects is not absolute but is constrained by legal certainty and the obligation to protect community rights.

Under Gustav Radbruch's Theory of Legal Certainty, the law must provide clarity regarding the subjects and objects of land acquisition, the stages of the acquisition process, procedures for relinquishing rights, mechanisms for determining compensation, and the legal remedies available to affected communities. Legal certainty in land acquisition for National Strategic Projects therefore serves not only to facilitate development but also to clarify and protect the legal position and rights of communities whose land is subject to acquisition. Accelerated implementation must consequently not be interpreted as permitting any reduction in the procedures or legal safeguards afforded to communities.

These regulatory guarantees must, in turn, be translated into concrete legal protection at each stage of the land acquisition process. Under Philipus M. Hadjon's Theory of Legal Protection, such protection is preventive as well as repressive. Preventive protection is realized through planning, information disclosure, consultation and community participation, identification and inventory of the subjects and objects of land acquisition, deliberation, and the provision of fair and adequate compensation. Repressive protection is provided through objection and dispute-resolution mechanisms available when communities consider that their rights have been adversely affected.

References

- Aditya et al. (2023). Kepastian Hukum Dalam Pengadaan Tanah Untuk Pembangunan Proyek Strategis Nasional Terkait Ganti Kerugian Bagi Masyarakat Yang Terdampak. *Sentri: Jurnal Riset Ilmiah*, 2(9).
- Angela, K., & Setyawati, A. (2022). Analisis Pelaksanaan Pengadaan Tanah Di Atas Tanah Ulayat Masyarakat Hukum Adat Dalam Rangka Proyek Strategi Nasional (PSN) Demi Kepentingan Umum. *Rewang Rencang: Jurnal Hukum Lex Generalis*, 3(3).
- Butar et al. (2023). Proses Pengadaan Tanah Untuk Kepentingan Umum Menurut Undang-Undang No. 2 Tahun 2012. *Jurnal Ilmiah Dan Karya Mahasiswa*, 1(3).
- Diantha, I. M. P. (2017). *Metodologi Penelitian Hukum Normatif dalam Justifikasi Teori Hukum*. Kencana.
- Fernandes et al. (2022). Analisis Yuridis Kedudukan Fungsi Sosial Hak Atas Tanah Bagi Pekarangan Yang Tertutup. *Jurnal Reformasi Hukum: Cogito Ergo Sum*, 5(1).
- Gusmana et al. (2026). Perlindungan Hukum Badan Keagamaan Atas Tanah Pelaba Pura di Bali. *Al-Zayn: Jurnal Ilmu Sosial & Hukum*, 4(1).
- Hadjon, P. M. (1987). *Perlindungan Hukum Bagi Rakyat Indonesia*. Bina Ilmu.
- Hartana, I. G. A. A. M. C. (2019). Hukum Tanah Sebagai Bagian Dari Hukum Agraria Dalam Pembangunan Nasional Di Indonesia. *Jurnal Pendidikan Kewarganegaraan Undiksha*, 7(3).
- Hotta, A. Y. (2024). Pemahaman Terhadap Asas Kepastian Hukum Melalui Konstruksi Penalaran Positivisme Hukum. *Jurnal Hukum Dehasen*, 1(1).

- Ichwan et al. (2026). Tinjauan Yuridis Hukum Agraria Sebagai Instrumen Keadilan Sosial Dan Pembangunan Nasional. *Kamara Journal*, 3(4).
- Meitadewi et al. (2025). Perlindungan Hukum Bagi Pemilik Hak Atas Tanah Dalam Pengadaan Tanah Untuk Pembangunan Jalan Umum. *Al-Zayn: Jurnal Ilmu Sosial & Hukum*, 3(6).
- Sudana et al. (2022). Asas Keadilan Dalam Pengadaan Tanah Bagi Pembangunan Untuk Kepentingan Umum. *Notary Law Journal*, 1(1).
- Wibawa, I. P. A. S., & Yoga, I. G. P. (2025). Implikasi Hukum Tanah Hak Milik Perseorangan Pada Radius Kesucian Pura Pasca Keputusan Bhisama Kesucian Pura. *Jurnal Media Akademik (JMA)*, 3(12).

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