

# Rationalistic Model of Land Bank Institutional Regulation in PERPU No. 2 of 2022 Concerning Job Creation in Harmony with the Principle of Legal Benefits

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**Abstract:** *This study examines the rationale for establishing the Land Bank Institution under Government Regulation in Lieu of Law (Perppu) No. 2 of 2022 concerning Job Creation. Land acquisition for public purposes in Indonesia has long faced challenges due to population growth, increasing land prices, limited land availability, and disputes over compensation. To address these issues, the government introduced the Land Bank as part of its agrarian reform agenda under the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency. The Land Bank is intended to ensure land availability for public interests, social welfare, national development, economic equity, land consolidation, and agrarian reform. Its establishment is expected to improve the efficiency of land acquisition processes and reduce conflicts related to compensation payments. However, because the Land Bank was not previously regulated under Law No. 5 of 1960 concerning Basic Agrarian Principles, its creation has raised questions regarding its legal basis, implementation, and effectiveness in serving community interests. This research employs a normative juridical method with a statutory approach, utilizing primary and secondary legal sources. The study finds that the Land Bank is designed to support legal certainty and public welfare by providing a structured mechanism for land management and acquisition. Furthermore, public dissemination and understanding of the Land Bank framework are essential to ensure that its implementation aligns with the principle of legal benefit and contributes to resolving land-related problems in Indonesia.*

**Keywords:** *The Legislation of Government Regulation in Law No. 2 of 2022 concerning Job Creation, Banking Institutions Land, Legal Benefits*

## Introduction

Land is a strategic resource with economic, social, and political functions in national life. In the context of national development, land availability is often a major obstacle, particularly in the implementation of public interest projects and investments. Therefore, the state introduced the concept of a Land Bank as an instrument for centralized land management (Limbong, 2013). Regulations regarding the Land Bank first appeared in the Job Creation Law and were later strengthened through Government Regulation in Lieu of Law No. 2 of 2022. In this regulation, the Land Bank is positioned as a special legal entity granted broad authority in land management (Law No. 2., 2022). However, the existence of the Land Bank has sparked controversy. Some believe that its regulations have the potential to create unequal access to land and open up new opportunities for speculation (Dewi, 2023). Furthermore, the process of establishing Perpu No. 2 of 2022 concerning Job Creation

was perceived as being too fast- *tracked* and seemingly rushed. Discussions on the establishment of the Land Bank are regulated in Articles 125 to 137 of Chapter VIII, Part Four, concerning Land, in Government Regulation in Lieu of Law No. 2 of 2022 concerning Job Creation.

A law, if drafted hastily and through a rapid process without a clear and definite legal basis and without public access, will be extremely dangerous and detrimental. The dangers for the legislators include carelessness and a lack of in-depth discussion, while the harm to the public is the loss of opportunities for participation, which undermines democratic principles (Putra, 2021). Furthermore, the hasty drafting of regulations, such as the Job Creation Law, has become a time bomb for the implementation of a democratic state based on the rule of law (Chandranegara, 2020). This is despite Article 20, Number 2, of the 1945 Constitution explicitly stating that the House of Representatives holds the power to draft laws.

Every draft law is deliberated by the House of Representatives and the President for joint approval. The 1945 Constitution is the highest source of law under Pancasila, serving as a reference for the creation of previous laws. Therefore, in the hierarchy of legislation, the 1945 Constitution holds a higher position than laws and regulations in lieu of laws (Perpu). Legislation formulated by various countries plays a very important role and position, not only as a code of ethics but also as a basis for legitimizing behavior and attitudes in everyday life (Riwanto, 2017). Even in a democratic state governed by the rule of law, the important role of law goes beyond realizing the prosperity and well-being of the people. Another crucial requirement is that the law must be based on the principle of certainty. Certainty means that it must be known to all parties, be consistent, clearly implemented, simple, and enforced firmly (Anggono, 2014).

Therefore, according to the author, the rationale aspect of the establishment of the Land Bank institution is still not fully aligned with the principle of legal utility as put forward in Jeremy Bentham's theory of legal utilitarianism. Based on this, the author formulates the problem as follows:

- a) How rational is the institutional arrangement model for the Land Bank in Government Regulation in Lieu of Law No. 2 of 2022?
- b) What is the ideal model for institutional arrangements for land banks to align with the principle of legal benefit?

## Research Methods

This research uses a normative legal method, with a normative juridical type of research, utilizing both a legislative and a conceptual approach. The legal sources used are:

- Primary legal materials, such as: the 1945 Constitution, Law No. 12 of 2011 concerning the Formation of Legislation, Law No. 5 of 1960 concerning the Basic Agrarian Law, Government Regulation in Lieu of Law No. 2 of 2022 concerning Job Creation, and Government Regulation No. 64 of 2021 concerning the Formation of a Land Bank.

- Secondary legal materials, such as: legal journals on land, land bank institutions and the Job Creation Regulation, books, and legal literature discussing land and land banks. This normative legal research is conducted through the analysis and examination of structured sources identified with the research subject so that clear information can be obtained, thus assisting the research and distinguishing the research from more recently introduced content (Ibrahim, 2007).

## Literature Review

### *Theory of Legal Utilization in the Establishment of a Land Bank Agency*

The principle of legal utility is rooted in Jeremy Bentham's thinking, which states that law should provide the greatest possible benefit to society. The purpose of law is not only to provide benefits, happiness, and prosperity to society. The good or bad of a state policy must be measured based on the benefits it generates for society at large. In Bentham's view, law is not enough to simply guarantee certainty but must also provide practical benefits for society. Therefore, every regulation must be assessed based on the concrete benefits it produces. The appropriateness of Jeremy Bentham's analysis of the principle of utility in this study to the establishment of the Land Bank is as follows:

- a) The establishment of a Land Bank can ensure the availability of land for public purposes, such as providing land for infrastructure development, public facilities, public housing, and other social purposes. Planned land availability can accelerate national development and improve public welfare. If development is effective, the benefits to the community will be greater, such as improved road access, educational facilities, hospitals, and economic growth.
- b) Supporting Agrarian Reform  
The allocation of at least 30% of land for agrarian reform reflects a focus on social equality. Agrarian reform has the potential to reduce inequality in land ownership and improve farmer welfare. Thus, the Land Bank policy can create collective benefits such as equitable land access, efforts to reduce agrarian conflict, and increased community economic productivity.
- c) Land Management Efficiency  
Before the Land Bank, land acquisition was often hampered by disputes, price speculation, and lengthy bureaucratic red tape. The establishment of a state land bank would allow for more systematic control of land reserves. According to Jeremy Bentham, bureaucratic efficiency is a form of legal benefit because it reduces social and economic losses caused by slow development.
- d) Encouraging Investment and Economic Growth  
Land banks can also ensure land availability for investment. Increased investment leads to more jobs and increased economic growth. From a utilitarian perspective, the economic benefits felt by the wider community can be used as a justification for this policy (Bentham, 1789b).

Apart from the suitability of the principle of benefit for the establishment of a land bank for the community, there are also inconsistencies in the principle of benefit with the establishment of the land bank body, including:

a) Potential for investment interest domination

Public concern regarding the establishment of a land bank is that it prioritizes investment interests over the interests of the common people. If land is allocated primarily to large corporations, legal benefits will only benefit certain groups. According to Jeremy Bentham's theory of utility, policies that benefit only a select few do not fulfill the principle of " *The Greatest Happiness of the Greatest Number* ." Therefore, if the distribution of benefits is unequal, the policy's utilitarian legitimacy is weakened (Bentham, 1789a).

b) Risk of Agrarian Conflict

Land acquisition by the state has the potential to create conflict with indigenous or local communities. In practice, there are concerns that communities will lose their land rights to make way for development projects. According to Jeremy Bentham, if a policy causes significant social suffering, it cannot be considered wholly beneficial. This means that the benefits of development must outweigh the resulting social harm.

c) Centralization of State Power

The Land Bank regulatory model grants the state significant authority over land ownership. This situation has the potential to lead to abuse of power if not balanced by strong oversight mechanisms. From a utilitarian perspective, state power must remain directed toward public welfare. If substantial authority leads to injustice or corruption, the goal of legal benefit is not achieved.

## Land Banking Theory

A land bank is a policy or instrument used by the state to manage, accumulate, and distribute land for development and public welfare. Conceptually, a land bank functions as an institution that plans, acquires, manages, utilizes, and distributes land in a structured and sustainable manner. The Land Bank aims to address inequality in land ownership and ensure land availability for both public interest and national development (Siregar, 2019).

From a theoretical perspective, land banking is rooted in the concept of state control over land. Land is not only viewed as an economic commodity but also has a social dimension that must be utilized optimally for the prosperity of the people. Therefore, the state has the legitimacy to regulate the distribution and use of land to prevent monopolies or speculation that are detrimental to the wider community (Harsono, 2008a). Land banks have several primary functions, including acting as *land keeper* , *land warrantee* , *land purchaser* , *land distributor* , and *land manager* . Through these functions, land banks are expected to maintain land price stability, provide land for strategic projects, and support agrarian reform and infrastructure development (Alexander, 2011). In practice, land banking is implemented through land acquisition mechanisms from various sources, such as abandoned land, state land, or purchases from private parties. The acquired land is then

managed and distributed as needed, for example, for public housing, industrial areas, or public facilities. This model has been implemented in various countries with varying approaches, depending on their respective legal systems and agrarian policies (UN-Habitat, 2018).

## Discussion

### *The Rationale for the Institutional Arrangement of Land Banks in Government Regulation in Lieu of Law No. 2 of 2022*

The establishment of the Land Bank institution in Government Regulation in Lieu of Law (Perpu) Number 2 of 2022 concerning Job Creation cannot be separated from the state's need to reorganize land management in a more systematic, planned, and equitable manner. The primary rationale for the land bank's existence is to address the classic problems in land management in Indonesia, namely inequality in land ownership, agrarian conflicts, and limited public access to land for economic and social interests. The state, through this instrument, seeks to be actively involved in managing land reserves to ensure the public interest and sustainable national development. Furthermore, the establishment of the Land Bank is also motivated by the need for an institution capable of integrating the functions of planning, acquisition, management, utilization, and distribution of land within a single, integrated institutional system. Previously, these functions were spread across various agencies and often lacked coordination, leading to potential conflicts of authority. With the Land Bank, the state seeks to create a single, more effective mechanism to ensure land availability for national strategic projects and community social interests (Irianto, 2025).

Another rationale is to support the acceleration of investment and national economic development. In this context, the land bank acts as a *land manager*, ensuring land availability for investors without neglecting the principle of social justice. This is crucial because one of the main obstacles to investment in Indonesia is the difficulty in obtaining land that is free from land disputes and ready for use. Therefore, the existence of a land bank is expected to reduce bureaucratic obstacles and provide legal certainty for business actors (Academic Manuscript of the Draft Law on Job Creation., n.d.). Furthermore, the establishment of a land bank also reflects the state's efforts to implement the principle of the social function of land rights as mandated by national agrarian law. Land is not merely viewed as an economic commodity, but also as a source of life that must be managed for the greatest prosperity of the people. Therefore, the Land Bank has a mandate to distribute land fairly, including for agrarian reform, public housing development, and public facilities. Institutionally, the Land Bank is designed as a special body with flexibility in managing land assets while remaining under state supervision.

The rationale behind the land bank's institutional design is to combine managerial efficiency, similar to a corporate system, with public accountability as a state entity. Thus, the land bank is expected to operate professionally, transparently, and free from land speculation practices that are detrimental to the community. Furthermore, the provisions in Government Regulation in Lieu of Law (Perpu) No. 2 of 2022 also emphasize the state's role as both regulator and operator in land management. This is a response to global dynamics

that require the state to be more adaptive in managing strategic resources. The rationale behind the land bank also ensures that land, as a limited resource, is not entirely left to market mechanisms but remains under state control to maintain a balance between economic interests and social justice. Therefore, it can be concluded that the rationale behind the land bank institution in Perpu No. 2 of 2022 is rooted in the need to create an integrated, equitable, and efficient land management system. This institution serves not only as a technical instrument for land provision but also as a state policy tool for realizing agrarian justice and supporting inclusive national development (ATR/BPN, 2021).

The Land Bank is regulated in Articles 125-135 of Government Regulation in Lieu of Law No. 2 of 2022 concerning Job Creation. Under these provisions, the Land Bank is a legal entity established by the central government and has special authority in land management. Institutionally, the Land Bank consists of:

- 1) Committee
- 2) supervisory Board
- 3) Implementing Agency

This structure demonstrates that the land bank is under strong central government control, reflecting a centralized institutional model. Furthermore, the Land Bank has key functions, including planning, land acquisition, management, utilization, and distribution. These functions demonstrate that the land bank acts as a " *land manager* " within the national agrarian system (Chandranegara, 2020).

### ***An Ideal Model for Land Bank Institutional Arrangements to Align with the Principle of Legal Benefit.***

The Indonesian government passed Government Regulation in Lieu of Law (Perppu) No. 2 of 2022 concerning Job Creation as an effort to improve the investment climate and create jobs. One key instrument in this law is the establishment of a Land Bank Agency, which aims to ensure the availability of land for public use (Government Regulation Number 64 of 2021 Concerning Land Banks, 2021). The creation of the Job Creation Law through *an omnibus law method* has sparked widespread debate. This Perppu was first issued by President Joko Widodo on December 30, 2022.

Previously, through Constitutional Court Decision No. 91/PUU-XVIII/2020, the Constitutional Court declared the creation of Law No. 11 of 2020 concerning Job Creation to be formally flawed and conditionally unconstitutional. The Constitutional Court then gave the Constitutional Court two years to rectify the creation process (Constitutional Court Decision Number 91/PUU-XVIII/2020, n.d.). If not corrected, the law would become permanently unconstitutional. However, before the two-year deadline expired, the government issued the Government Regulation in Lieu of Law (Perppu). The government argued that post-pandemic global conditions, the threat of recession, inflation, the Russia-Ukraine war, and the need for investment certainty created an urgent situation. This argument also appeared in the considerations of the Perppu.

Meanwhile, from the government's perspective, the three requirements of the Constitutional Court are considered fulfilled if there is an urgent need. The government

considers the 2022 global economic situation to be full of uncertainty, such as the threat of a global recession, rising inflation, supply chain disruptions, and slowing investment. Because the Job Creation Law is a key instrument for economic and investment reform, the government believes legal certainty must be restored immediately. Furthermore, it considers a legal vacuum or uncertainty, resulting in the Job Creation Law's status being "conditionally unconstitutional." This creates uncertainty about whether old norms are fully applicable, whether investors remain protected, and how derivative regulations will apply. The government considers this situation to create a practical legal vacuum. On the other hand, many constitutional law experts consider Government Regulation in Lieu of Law (Perpu) No. 2 of 2022 to be constitutionally problematic. There is no truly extraordinary urgency, and the government is actually avoiding regular legislative mechanisms. The Constitutional Court previously ordered improvements to the law's formation through proper legislative procedures. However, the government chose the Perpu route. Therefore, criticism at the time arose that the Perpu was used not for emergencies, but to expedite the process, avoid political debate, and avoid repeated widespread public participation (Asshiddiqie, 2007).

The Perpu also includes an article discussing the establishment of a land bank in a land cluster. A positive analysis shows that the concept of a land bank *is* not new in global practice. Before land banks were introduced in Indonesia, other countries such as the Netherlands and the United States had long used land banks to manage state land reserves, control land prices, and support infrastructure and public housing development (Larsson, 2022). In Indonesia, this idea emerged due to several structural issues, including unequal land ownership, uncontrolled land price increases, difficulties in acquiring land for strategic projects, and the large amount of unproductive, abandoned land. These issues prompted the government to seek institutional instruments capable of managing land more systematically. The basis for land management in Indonesia is rooted in the Basic Agrarian Law Number 5 of 1960, which mandates that the state has the right to control land for the greatest possible prosperity of the people (Basic Agrarian Law (UUPA) No. 5 of 1960, n.d.). However, for decades, land management implementation remained sectoral and had not been integrated into a dedicated institution like a land bank. The idea of establishing a land bank gained strength during the reform era and during the National Medium-Term Development Plan (RPJMN) since 2015 (RPJMN, n.d.).

Then, during the Joko Widodo administration, the agrarian reform program became a national priority. This program included land redistribution, asset legalization, and land provision for public use. However, the implementation of agrarian reform faced major obstacles due to limited state land reserves, agrarian conflicts, and land speculation. Following the Job Creation Law, the government issued a derivative regulation, Government Regulation Number 64 of 2021 concerning the Land Bank. This Government Regulation detailed the institutional structure. Land sources managed by the land bank include abandoned land, state land, forest area releases, and other land acquisitions. The Land Bank officially became a special state-owned legal entity that is non-profit yet

professional (Government Regulation Number 64 of 2021 Concerning Land Banks, 2021). The land bank has several unique characteristics, including:

- a. Special legal entity (not the same as a regular state-owned enterprise)
- b. Manage land assets, not money
- c. Acts as *a land manager* and *land distributor*

Meanwhile, the main functions of the Land Bank Agency include:

- a. Land planning
- b. Land acquisition
- c. Land management
- d. Land use
- e. Land distribution

Although land banks are considered to have progressive goals, their implementation has not been without criticism. Several groups, including academics, agrarian activists, and civil society organizations, believe that this policy has the potential to create various problems, particularly related to agrarian justice, transparency, and the protection of community rights. Therefore, it is important to comprehensively examine the weaknesses of the Land Bank. Some argue that several weaknesses constitute the Land Bank, including:

a) Potential for Agrarian Conflict

One of the main weaknesses of the Land Bank is the potential for increased agrarian conflict. Large-scale land acquisition can conflict with the rights of indigenous communities and smallholder farmers who have long owned land for generations but lack official land titles. This situation can trigger evictions and protracted land disputes.

b) Lack of Protection of Community Rights

Despite regulations, protection for affected communities remains weak. Compensation mechanisms often fail to reflect fairness, particularly for vulnerable groups. Furthermore, communities are often unequally represented in land negotiations with the state or corporations.

c) Risks of Land Commercialization

Land banks have the potential to become instruments for land commercialization. Rather than focusing on the public interest, there are concerns that the land under management will be increasingly used for private investment. This could shift the original goal of agrarian reform to purely economic interests.

d) Lack of Transparency and Accountability

The management of the Land Bank is considered less than fully transparent. Information regarding land acquisition, distribution, and utilization is not always readily accessible to the public. This lack of transparency opens up opportunities for corruption, collusion, and nepotism.

e) Overlapping Regulations

The Land Bank policy has the potential to overlap with other regulations in the areas of land, forestry, and spatial planning. This could lead to confusion in implementation and slow down administrative processes.

f) Weak Supervision

Oversight of the Land Bank's implementation remains a challenge. Without a robust oversight system, the potential for abuse of authority increases, as the Land Bank's mechanisms lack transparency to the public (Harsono, 2008b).

If the problem of weaknesses in the performance of land bank governance is poor and weak, it can have a negative impact on the Land Bank, such as:

a) Social Impact

Agrarian conflicts can lead to social tension and even violence. Communities who lose land also risk losing their livelihoods.

b) Economic Impact

Inequality in land ownership can widen, leading to increased economic disparities between social groups.

c) Legal Impact

The large number of land disputes can burden the justice system and create legal uncertainty (Wiradi, 2009).

So, according to the author, the ideal model for institutional arrangements for the Land Bank Agency to be in line with the principle of legal benefit is as follows:

a. Basic concept of land banking and the principle of legal utility

Land banks are a state instrument to ensure the availability of land for public interest, development, and economic equality. From a utilitarian perspective, as proposed by Jeremy Bentham, the law should provide the greatest benefit to the greatest number of people. Therefore, the institutional arrangements for land banks must be directed not only at administrative efficiency but also at the fair and equitable distribution of benefits to the wider community (Bentham, 1789b).

b. Independent and accountable institutions

The ideal model for a land bank would be a special body with operational autonomy but still subject to state oversight. This independence is crucial for the land bank to move quickly in land acquisition, management, and distribution. However, to ensure legal benefits, strong accountability mechanisms are required through legislative oversight, public audits, and information disclosure to prevent abuse of authority (Asshiddiqie, 2006).

c. Integration of the social function of land in governance.

Institutional arrangements must internalize the principle of the social function of land rights, as mandated by Indonesian agrarian law. This means that land banks should not be solely oriented toward economic value but should also consider social interests, such as land redistribution for the underprivileged, agrarian reform, and the provision of land for public facilities. This ensures that the land bank truly provides tangible benefits to the wider community (UUPA No. 5 of 1960, n.d.).

d. Public needs-based planning and management mechanisms

The ideal model should place needs-based planning as the foundation for land bank operations. This means that land acquisition and distribution must be based

on an analysis of national and regional development needs, not simply market opportunities. Thus, the principle of legal utility is achieved through targeted land use, such as for public housing, infrastructure, and strategic economic areas (Sumardjono, 2008).

- e. Public participation in the decision-making process.  
To ensure inclusive legal benefits, land banking institutions must foster public participation in the planning and decision-making process. This participation can be achieved through public consultations, stakeholder forums, and objection mechanisms. By involving the public, the resulting policies will be more responsive to real needs and minimize agrarian conflict (Rahardjo, 2000).
- f. Multi-layered monitoring and law enforcement system  
Land banking oversight must be multi-layered, both internal and external. Internal oversight is carried out through a risk management and compliance system, while external oversight involves state institutions such as the Supreme Audit Agency (BPK) and the Corruption Eradication Commission (KPK). Strict law enforcement against violations is key to ensuring that land management truly provides optimal benefits and is not misused for private interests (HR, 2014).
- g. Leveraging technology for transparency and efficiency  
The ideal institutional model must also adopt information technology in land data management. Digitizing land assets, geographic information systems (GIS), and public transparency platforms will increase efficiency and prevent corruption. This will allow the public to access information openly, ultimately strengthening the principle of legal benefit through transparency and fair access (Soto, 2000).

## Conclusion and Suggestion

The rationale behind the land bank's institutional design is to combine managerial efficiency, similar to a corporate system, with public accountability as a state entity. Thus, the land bank is expected to operate professionally, transparently, and free from land speculation practices that are detrimental to the community. Furthermore, the provisions in Government Regulation in Lieu of Law (Perpu) No. 2 of 2022 also emphasize the state's role as both regulator and operator in land management. This is a response to global dynamics that require the state to be more adaptive in managing strategic resources. The rationale behind the land bank also ensures that land, as a limited resource, is not entirely left to market mechanisms but remains under state control to maintain a balance between economic interests and social justice. Therefore, it can be concluded that the rationale behind the land bank institution in Perpu No. 2 of 2022 is rooted in the need to create an integrated, equitable, and efficient land management system. This institution serves not only as a technical instrument for land provision but also as a state policy tool for realizing agrarian justice and supporting inclusive national development.

The ideal model for a Land Bank institutional arrangement should be aimed not only at administrative efficiency but also at the fair and equitable distribution of benefits to the wider community. The Land Bank should also be a special body with operational

autonomy, yet remain within the framework of state oversight. This independence is crucial for the Land Bank to move quickly in land acquisition, management, and distribution. However, to ensure legal benefits, a strong accountability mechanism is needed through legislative oversight, public audits, and information transparency to prevent abuse of authority. Land Bank oversight must be multi-layered, both internal and external. Internal oversight is carried out through a risk management and compliance system, while external oversight involves state institutions such as the Supreme Audit Agency (BPK) and the Corruption Eradication Commission (KPK). Strict law enforcement against violations is key to ensuring that land management truly provides optimal benefits and is not misused for special interests. Furthermore, the Land Bank must adopt information technology in land data management. Digitizing land assets, geographic information systems (GIS), and public transparency platforms will increase efficiency and prevent corruption. This will allow the public to access information openly, ultimately strengthening the principle of legal benefits through transparency and fair access.

The suggestions from this research are: The government needs to revise the institutional arrangements for the Land Bank by emphasizing the principle of legal benefit so that the goal of public welfare can be achieved and not only benefit certain parties, but also bring benefits to the public interest and society.

## References

- Academic Manuscript of the Draft Law on Job Creation. (n.d.).
- Alexander, F. S. (2011). *Land Banking as Metropolitan Policy*, Washington DC.: Brookings Institution.
- Anggono, B. D. (2014). *Development of Law Formation in Indonesia*, Constitution Press, Jakarta.
- Asshiddiqie, J. (2006). *Introduction to Constitutional Law*, Jakarta, Konstitusi Press.
- Asshiddiqie, J. (2007). *Emergency Constitutional Law*, PT. Raja Grafindo Persada.
- ATR/BPN, M. of. (2021). *Concept and Implementation of Land Banks in Indonesia*, ATR/BPN.
- Basic Agrarian Law (UUPA) no. 5 of 1960. (n.d.).
- Bentham, J. (1789a). *An Introduction to the Principles of Morals and Legislation*, Oxford University Press.
- Bentham, J. (1789b). *An Introduction to the Principles of Morals and Legislation*.
- Chandranegara, I. S. (2020). *Comparison of Legal Policies in Handling the Covid-19 Pandemic in Various Countries: Use of Emergency Laws or Optimization of Existing Legal Instruments?*, Legal Aspects of the Implications of Covid-19 in Indonesia, Prenada Media, Jakarta.
- Constitutional Court Decision Number 91/PUU-XVIII/2020. (n.d.).
- Dewi, N. H. (2023). *Legal Implications of Land Bank Regulation as a Provider in Land Acquisition*, Kertha Wicara Journal, Journal of Legal Science (Faculty of Law, Udayana University).
- Government Regulation in Lieu of Law No. 2 of 2022 concerning Job Creation. (2022).

- Government Regulation Number 64 of 2021 concerning Land Banks. (2021).
- Harsono, B. (2008a). Indonesian Agrarian Law: History of the Formation of UUPA , Jakarta, Djambatan.
- Harsono, B. (2008b). Indonesian Agrarian Law , Jakarta, Djambatan.
- HR, R. (2014). State Administrative Law , Jakarta, Raja Grafindo Persada.
- Ibrahim, J. (2007). Theory, Methods and Normative Legal Research , Bayumedia Publishing, Malang.
- Irianto, A. R. (2025). The Urgency of Land Bank Regulation as a Land Providing Institution, Journal of Legal Studies, Ius Scientia, Vol 1 No. 1.
- Larsson, G. (2022). Land Management: Public Policy, Control and Participation.
- Limbong, B. (2013). Land Bank, Margaretha Pustaka.
- Putra, M. D. (2021). Fast Track Legislation , Jurnal Maksigama, Vol.15, No.2, November.
- Rahardjo, S. (2000). Legal Studies , Bandung, Citra Aditya Bakti.
- Riwanto, A. (2017). Realizing Progressive Just Law from a Pancasila Perspective , Ahkam Journal, Vol.2, No.2.
- RPJMN. (n.d.). Documents 2015–2019 and 2020–2024. 2024.
- Siregar. (2019). Parlindungan, Indonesian Agrarian Law , Jakarta, Mandar Maju,.
- Soto, H. de. (2000). The Mystery of Capital , New York: Basic Books.
- Sumardjono, M. S. (2008). Land in the Perspective of Economic, Social and Cultural Rights , Jakarta, Kompas.
- UN-Habitat. (2018). Land Banking and Land Value Capture , Nairobi, United Nations.
- Wiradi, G. (2009). Agrarian Reform , Jakarta, Gramedia.