

Prospects for Collecting Land and Building Tax (PBB) on Raft Houses in the Musi River, Palembang City

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Abstract: Palembang City is characterized by a geography dominated by waterways, which is reflected in the existence of floating houses along the Musi River as a form of traditional settlement. Floating houses serve important social and economic functions; however, to date they have not obtained legal certainty, particularly in relation to the imposition of Land and Building Tax (Pajak Bumi dan Bangunan/PBB). The main issue lies in the unclear legal status of floating houses as taxable objects, as these structures are built over water and are not attached to land, whereas PBB is generally imposed on land and/or buildings associated with land. This study aims to analyze the prospects for imposing PBB on floating houses along the Musi River in Palembang City, to identify juridical, administrative, and social constraints in their taxation, and to evaluate their potential contribution as a source of Regional Original Revenue (Pendapatan Asli Daerah/PAD). The research employs a sociological (empirical) legal research method, combining normative and empirical approaches through literature review and interviews with local government officials and floating house owners. The findings indicate that, conceptually and normatively, floating houses have the potential to be classified as objects of PBB based on their function and utilization as buildings. However, the implementation of PBB collection has not been carried out optimally due to the absence of specific regulations, limitations in tax object valuation mechanisms suited to the characteristics of floating houses, and social and cultural considerations within the community. Therefore, clear legal arrangements and equitable fiscal policies are required to provide legal certainty and to ensure effective PBB collection on floating houses without disregarding social values and local wisdom

Keywords: Floating Houses; Land and Building Tax; Legal Certainty; Local Tax; Musi River

1. Introduction

In addition to being well known for its traditional cuisine, pempek, Palembang is one of the cities in Indonesia where a significant portion of its territory consists of aquatic environments. In the early nineteenth century, Palembang was referred to as the “Venice of the East,” reflecting its identity as a water-based city in the eastern region. According to statistical data from 1990, approximately 50% of Palembang’s land area remained inundated by water, primarily in the form of swamps (Wikipedia Bahasa Indonesia, *Ensiklopedia Bebas*, n.d.).

Based on the Kedudukan Bukit Inscription, Palembang is one of the oldest cities in Indonesia, with an estimated age of around 1,338 years, and was once the center of the Srivijaya Kingdom in the 7th century CE. This long history has shaped Palembang into a city with significant cultural and historical value, reflected in various cultural heritage sites along the Ilir and Ulu areas of the Musi River. In addition to historical artifacts, the presence of riverside settlements, building typologies, and a river-oriented residential culture provide strong evidence of the cultural identity of the Musi River area to this day (Mindasari et al., 2022).

Along the banks of the Musi River, many residents of Palembang build their homes. Most houses are constructed in the stilt-house style, adapted to the needs of people living by the river. In addition to stilt houses, some residents also build floating raft houses on the water along the Musi River. Rivers play an essential role in daily life, serving as sources of water, natural open spaces, means of transportation, and support systems for

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various human needs (M.F. Oktarini , H.M. Hapsari, M. D. Irawan, M. F. Fihari & Syaharani, 2021). Most residential houses are constructed in the form of stilt houses, as they are adapted to the needs of communities living along the banks of the Musi River. In addition to stilt houses, some residents have built floating raft houses that rest on the water along the riverbanks of the Musi River. Among the Malay communities, who generally reside along the Musi River in stilt houses, there are also some who live on the riverbanks in floating raft houses (Wicaksono et al., 2020).

Raft houses are dwellings with a unique architectural character, as they float on the Musi River in Palembang. In Indonesia, a similar type of housing is only found in Kalimantan, where it is known as a *lanting house*. Therefore, the existence of raft houses holds significant value and should be preserved while maintaining the local wisdom reflected in their architecture (Jaya et al., 2022).

The raft house is one of the traditional houses of South Sumatra Province, particularly in Palembang. In addition to stilt houses, settlements along the banks of the Musi River are also characterized by the presence of *rumah rakit* (floating raft houses) as a traditional form of dwelling distinctive to the city of Palembang, which initially developed from the settlements of Chinese migrant communities (Sastika et al., 2022). Raft houses are designed to suit the natural conditions of Palembang. Physically, they float on water and do not rest on the ground. Raft houses are built on rafts made from bamboo or wooden planks, with bamboo as the main construction material.

Over time, raft houses have not only served as temporary dwellings but also as permanent homes for people who rely on river-based activities for their livelihood. Communities began developing raft houses with stronger and more stable structures, using metal drums or PVC pipes as flotation devices to increase buoyancy (Zuul Fitriana Umari, 2017).

Raft houses built on water have distinct characteristics compared to houses on land. The choice of water-resistant materials is a key factor in constructing raft houses, as the quality of materials determines the lifespan of the building. The construction techniques for raft houses take into account the movement or flow of the river to ensure that the house remains stable and does not shift or experience structural changes (Sastika et al., 2023).

Like conventional houses, whether on land or on water, there are legal regulations that govern them, including matters related to ownership, building permits, or Land and Building Tax (PBB). In relation to PBB, it is important to determine whether raft houses are considered taxable objects, especially if the raft houses are mobile—either due to natural factors, such as strong river currents requiring relocation, or because the owner chooses to move their raft house.

Article 33, paragraph (3) of the 1945 Constitution of Indonesia states that “The land, water, and natural resources contained therein are controlled by the state and used for the greatest possible prosperity of the people” (Undang-Undang Dasar Negara Republik Indonesia Tahun 1945, n.d.). This is closely related to the management of state revenue intended for the welfare of all Indonesian citizens. In this context, the state is granted full authority and mandate to manage natural resources, including determining and administering taxes.

The concept of agrarian matters has traditionally been equated with land, so Agrarian Law was often identified with Land Law. However, this understanding is no longer acceptable today. This is reflected in Article 1, paragraph 4 of the Basic Agrarian Law (UUPA), which states: “In the context of the Earth, besides the surface of the earth, it also includes the body of the earth beneath it and what lies under water” (Undang-Undang Nomor 5 Tahun 1960 Tentang Peraturan Dasar Pokok-Pokok Agraria Republik Indonesia. (1945), 1960). Based on this article, the Earth can be classified into: (1) the surface of the earth, (2) the body of the earth beneath the surface, and (3) the body of the earth located under water (Usman. A. H., 2011).

Raft houses on the Musi River have unique characteristics because they float on water without a fixed foundation on land. “Based on Law Number 12 of 1985 concerning

Land and Building Tax, and its revision in Law Number 12 of 1994, taxable objects are defined as land and/or buildings that are 'permanently attached' to the land." Physically, considering the nature of raft houses and referring to Law Number 12 of 1985, raft houses are not considered taxable objects under this law.

In relation to Article 1 point (39) of the Indonesian Law Number 28 of 2009 concerning Regional Taxes and Levies (Undang-Undang Nomor 28 Tahun 2009 Tentang Pajak Daerah Dan Retribusi Daerah. Lembaran Negara Republik Indonesia Tahun 2009 Nomor 130, 2009), floating houses can be considered as professional buildings that are entirely installed or in the process of being installed on land, water, or at sea. The definition of "planted" itself means "situated in or embedded in the ground." Therefore, floating houses and their structures located on water can be categorized as taxable objects under the provisions of Law No. 28/2009 concerning Regional Taxes and Levies (Hermawan & Michael, 2024).

From a normative perspective, the provisions of Land and Building Tax for Rural and Urban Areas (PBB-P2), as regulated in Law Number 28 of 2009, stipulate that taxable objects include land and/or buildings owned, controlled, and/or utilized by individuals or legal entities. The definition of "land" is not limited to dry land but also includes inland waters, while "buildings" are defined as technical constructions that are planted or permanently attached to land and/or waters. These provisions indicate that, normatively, regional tax law allows for the taxation of buildings located on water, as long as the buildings provide economic benefits and are under the control of a specific taxpayer. In line with the definition of land in Law Number 28 of 2009, Article 1, paragraph 4 of the Basic Agrarian Law (UUPA) states: "In the context of the Earth, besides the surface of the earth, it also includes the body of the earth beneath it and what lies under water."

Essentially, the existence of raft houses is not specifically regulated, whether in terms of building permits, ownership, or PBB. As a result, the legal certainty regarding the management of PBB for raft houses is lacking. This can lead to differences and even disparities in the taxation of raft houses compared to conventional houses that are recognized as taxable objects.

The theories underlying taxation by the state, according to Mardiasmo (2013), include several perspectives. The insurance theory states that taxes are a form of compensation for the protection provided by the state over the lives, property, and rights of its citizens. The interest theory explains that the amount of tax is adjusted according to an individual's level of interest in the state. The ability-to-pay theory emphasizes that taxes should be paid according to each person's capacity, as measured by income, wealth, and cost of living. The service theory views tax payment as a citizen's obligation to the state. Meanwhile, the purchasing power principle theory asserts that taxes function to transfer the community's purchasing power to the state, which is then returned for the welfare of the people (Ahmad Reza, 2017).

Regional taxes are one of the sources of Regional Own Revenue (Pendapatan Asli Daerah or PAD) and are expected to finance government administration and regional development to improve and equalize community welfare. With regional taxes, local governments are expected to exercise regional autonomy by managing their own domestic affairs.

Research on land and building taxes (PBB) has been extensively conducted, particularly in the context of land and buildings permanently established on the earth's surface. However, studies on buildings constructed over water have received relatively little attention. A few prior studies have explored the topic of buildings on water.

Previous research conducted by Rio Hermawan and Tomy Michael, entitled "Imposition of Land and Building Tax on Floating Settlements over Indonesian Waters," was published in *Media Hukum Indonesia (MHI)* by Yayasan Daarul Huda Krueng Mane in December 2024, Vol. 2, No. 4 (<https://ojs.darulhuda.or.id/index.php/MHI/article/view/967/1004>). This study discusses the issue of the unclear regulation of land and building tax for floating settlements over Indonesian waters.

Furthermore, research by Sylvie Liunadi, titled "Control over Floating Houses Installed in Water in Relation to Rural and Urban Land and Building Tax Objects According to Law Number 28 of 2009 on Regional Taxes and Regional Levies," was published in *Jurnal Hukum Adigama*, Vol. 4, No. 2, December 2021 (<https://journal.untar.ac.id/index.php/adigama/article/view/17132>). This study examines the legal protection for residents who control floating houses installed in water, viewed in the context of rural and urban land and building tax objects according to Law Number 28 of 2009 on Regional Taxes and Regional Levies.

However, to date, there has been no in-depth study specifically addressing the prospects and potential for imposing Land and Building Tax on floating houses on the Musi River, which, from a socio-economic perspective, serve as active residential dwellings for the community, yet legally there are no regulations governing these floating houses.

This study offers a novel contribution in several respects. This study constitutes the first specific analysis that highlights floating houses on the Musi River as potential objects within the local taxation system, which have never previously been examined systematically from either a legal or a socio-economic perspective. The study reviews the formal legal aspects of buildings that are not constructed on land but instead are located on water, thereby challenging the classical definition of Land and Building Tax (Pajak Bumi dan Bangunan/PBB) objects. In addition, this research offers a fiscal perspective on whether floating houses may be utilized as a new source of local tax revenue through strengthened regulatory frameworks and the mapping of alternative tax objects. From a practical standpoint, the findings of this study are expected to serve as a reference for local governments in formulating derivative regulations or new regional policies related to PBB objects, while also contributing to the development of a broader and fairer local tax base.

In line with this background, the objectives of this study are to identify the characteristics of floating houses as taxable objects, viewed in terms of their function, ownership, and legal status, and to assess whether they meet the criteria to be classified as subjects or objects of Land and Building Tax (PBB). This study also aims to examine the obstacles and challenges faced by local governments in implementing PBB collection on floating houses, including administrative issues, the need for legal certainty for floating house owners to prevent illegal levies, and the level of taxpayer awareness and compliance. Furthermore, this research evaluates the prospects and opportunities for implementing Land and Building Tax on floating houses along the Musi River as a potential means of increasing Regional Own-Source Revenue (Pendapatan Asli Daerah/PAD). Ultimately, this study seeks to formulate appropriate policy recommendations to ensure that the imposition and collection of Land and Building Tax on floating houses can be carried out fairly, effectively, and in accordance with the fundamental principles of tax law.

The primary research gap that distinguishes this study from previous research lies in its object of analysis, analytical approach, and fiscal policy orientation. Prior studies on buildings over water have generally been partial in nature and limited to specific aspects, such as the regulation of water-space utilization, the legality of settlements in aquatic areas, or the legal status of floating structures from the perspectives of agrarian law and spatial planning. Meanwhile, studies on Rural and Urban Land and Building Tax (PBB-P2) have predominantly focused on conventional buildings constructed on land with clearly defined land rights.

Specifically, no previous study has comprehensively examined floating houses as objects of PBB-P2, particularly buildings that are physically located on water and not permanently attached to land. Existing research tends to assume that tax objects under PBB-P2 necessarily have a direct relationship with land, thereby overlooking the juridical and administrative complexities associated with traditional floating houses that are semi-mobile in nature.

Furthermore, there is a significant gap in the operational and fiscal dimensions. Previous studies have not addressed the valuation mechanisms for determining the Tax Object Sales Value (Nilai Jual Objek Pajak/NJOP) of buildings over water, nor have they examined the administrative readiness of local tax authorities to assess and collect taxes from such objects. Additionally, the potential of floating houses as a sustainable source of Local Own-Source Revenue (Pendapatan Asli Daerah/PAD) has not been systematically analyzed. Social and cultural considerations—such as community acceptance, taxpayer compliance, and the risk of informal or illegal levies—have also received limited attention in earlier research.

Accordingly, this study fills these gaps by offering an integrated analysis that connects the characteristics of floating houses, the legal framework of PBB-P2, and their fiscal and social implications, thereby providing novel theoretical insights and practical contributions to the development of local tax policy.

Based on the background presented, this study finds it important to examine the regulatory framework concerning floating houses. Accordingly, this research investigates the prospects for the collection of Land and Building Tax (Pajak Bumi dan Bangunan/PBB) on floating houses along the Musi River in Palembang City, as well as the obstacles encountered in determining and imposing Land and Building Tax on such floating houses.

2. Materials and Methods

2.1 Type of Research

This study constitutes a sociological (empirical) legal research with a descriptive nature. It aims to provide a factual depiction of the conditions of floating houses along the Musi River in Palembang City, viewed from aspects of construction, function, and physical condition. This depiction is subsequently analyzed to assess the possibility of classifying floating houses as objects of Land and Building Tax (Pajak Bumi dan Bangunan/PBB) pursuant to Law Number 12 of 1985 on Land and Building Tax.

2.2 Research Approaches

This research employs three approaches. First, a normative (juridical-normative) approach, which examines laws and regulations related to Land and Building Tax, including Law Number 12 of 1985 on PBB, Palembang City Regional Regulation Number 4 of 2023 on Regional Taxes and Levies, as well as other implementing regulations governing tax objects, tax subjects, and PBB collection mechanisms. This approach aims to assess the legal status of floating houses as taxable objects under positive law. Second, an empirical (sociological) approach, which involves collecting field data concerning the characteristics of floating houses along the Musi River, ownership status, functional use, the perceptions of floating house owners regarding tax obligations, and the policies and practices of PBB collection implemented by the Palembang City Government. Third, a conceptual approach, which applies taxation theories such as the principles of tax justice, legal certainty, and ability-to-pay to analyze the feasibility and prospects of imposing Land and Building Tax on floating houses.

2.3 Data Collection Techniques

The data used in this study consist of secondary and primary data. Secondary data are obtained through library research, comprising primary legal materials in the form of statutory regulations, secondary legal materials such as books, academic journals, research reports, and scholarly works, as well as tertiary legal materials including legal dictionaries, encyclopedias, and relevant statistical data. Primary data are collected through field research using observation and interviews with floating house owners, communities living around the Musi River in the Seberang Ulu District, and authorized officials at the Palembang City Regional Revenue Agency, particularly the Head of the Land and Building Tax and Land and Building Rights Acquisition Duty (BPHTB) Division.

3.1 Data Analysis Techniques

Data analysis is conducted qualitatively using a juridical-empirical approach. Empirical data obtained from the field are analyzed and compared with applicable legal provisions, and subsequently interpreted using taxation theories. This analytical process aims to achieve a comprehensive understanding of the prospects, obstacles, and feasibility of Land and Building Tax collection on floating houses along the Musi River in Palembang City

Data analysis in this study was conducted qualitatively using a juridical-empirical approach. Primary data obtained through interviews and field observations were first classified thematically into several categories, namely the factual conditions of floating houses, the prospects for Land and Building Tax (PBB) collection, and juridical, administrative, and socio-economic constraints. The data were then reduced to select information relevant to the research questions. Subsequently, the empirical data were compared with normative provisions contained in tax-related legislation, particularly Law Number 28 of 2009 on Regional Taxes and Regional Levies and relevant local regulations governing Rural and Urban Land and Building Tax (PBB-P2). The next stage involved interpreting the data using taxation theories, such as legal certainty, tax justice, and the ability-to-pay principle, to assess the feasibility of imposing Land and Building Tax on floating houses. The results of the normative and empirical analyses were then synthesized to draw conclusions regarding the prospects, obstacles, and policy implications of Land and Building Tax collection on floating houses along the Musi River in Palembang City.

3. Results and Discussion

3.1 Prospects for Levies of Land and Building Tax (PBB) on Floating Houses along the Musi River in Palembang City

Floating houses are a traditional form of settlement unique to Palembang City, developing alongside the history of the Musi River as the center of the community's social and economic life. The Musi River not only serves as a means of transportation and trade but also as a living space for the community, shaping water-based settlement patterns (A. Budiman, 2017).

According to studies on the urban history of Palembang, floating houses have existed since the era of the Palembang Darussalam Sultanate and were used by traders, fishermen, and communities whose livelihoods depended on river activities. During the Palembang Sultanate period (16th–19th centuries), the indigenous population occupied the downstream area of the palace, while foreigners resided in Ulu Palembang, including Dutch factories and Chinese raft structures that functioned as warehouses and shops along the Aur River (Adiyanto, 2006). To this day, floating houses can still be found in several areas along the banks of the Musi River, although their numbers have declined due to urban planning policies and infrastructure development.

In terms of physical characteristics, floating houses are built on wooden frames with a floating system and anchored along the riverbank. Although they are floating structures, these houses are generally used as permanent residences, and some are even utilized for small businesses such as kiosks or service activities (A. Budiman, 2017).

a. Factual Conditions of Floating Houses on the Musi River:

houses along the Musi River can still be found in several urban villages, namely 1 Ulu, 2 Ulu, 3–4 Ulu, and 5 Ulu, totaling around 20 units. These floating houses function as residences, with some also used for small businesses.

Physically, the floating houses are supported by posts and are relatively permanent, having remained in the same location since they were first established. All of these floating houses are privately owned and occupied directly by their owners. This condition indicates that the floating houses possess clear characteristics of permanence, ownership, and utilization, and therefore, factually, they can be considered as buildings.

In line with statements from local residents, including the head of RT 05 in 3–4 Ulu who lives near the floating houses, based on an interview on December 8, 2025, the floating houses have never been moved since being established by their owners. Some of the floating houses are used solely for business purposes, while others serve as residential homes.

b. The Potential of Floating Houses as Objects of Land and Building Tax (PBB)

Land and Building Tax (PBB) is a tax imposed on land and/or buildings that are owned, controlled, or utilized by individuals or entities. Nationally, PBB is regulated under Law Number 28 of 2009 concerning Regional Taxes and Regional Retributions (UU PDRD), which grants authority to district/city governments to collect Rural and Urban PBB (Republic of Indonesia, 2009).

Article 77 paragraph (1) of UU PDRD states that the objects of PBB are land and/or buildings. A building is defined as a technical construction that is planted or permanently attached to land and/or water. This definition allows for the interpretation that a building does not necessarily have to stand on dry land but can also be situated over water (Mardiasmo, 2023).

Interviews with the Palembang City Regional Revenue Agency (Bapenda) on December 23, 2025, indicated that the objects of PBB-P2 include land and/or buildings owned, controlled, and/or utilized by individuals or entities. Buildings are defined as technical constructions that are planted or permanently attached to land and/or water.

Based on data from Seberang Ulu I District, floating houses on the Musi River empirically meet several criteria of PBB objects, including residential and business functions, relative permanence, and clear ownership. Therefore, conceptually and normatively, floating houses have the potential to be classified as PBB objects, particularly if they are considered buildings permanently attached to water. For more than a decade, the Rural and Urban Land and Building Tax (PBB-P2) has been administered by district and municipal governments and has become one of the main sources of Local Own-Source Revenue (PAD). This tax plays a strategic and significant role, influencing various aspects of social life and community activities, while also strengthening the implementation of regional autonomy through more effective fiscal autonomy (Oji Saeroji, 2025).

c. Fiscal Prospects for Regional Original Revenue (PAD)

From a fiscal perspective, the Palembang City Revenue Agency (Bapenda) stated that adding new PBB objects has the potential to increase Regional Original Revenue (PAD). However, specifically for floating houses, the contribution to PAD is estimated to be relatively small and not significant if calculated conventionally. This is due to the limited economic capacity of floating house residents and the relatively low economic value of the structures. According to Halim and Kusufi (2014), expanding the tax base is an important strategy to enhance regional fiscal independence (Halim, A., & Kusufi, 2014).

Property Tax (PBB) is one of the regional revenue sources with a strategic role in supporting local development financing. Nevertheless, the effectiveness of PBB collection still faces various challenges, particularly related to the awareness and compliance of taxpayers (Putri et al., 2025). Taxpayer compliance refers to the condition in which taxpayers fulfill all their tax obligations and exercise their tax rights in accordance with applicable regulations. A high level of compliance positively impacts tax revenue, as it indicates that taxpayers carry out their tax obligations in an orderly and responsible manner (Muharam, 2019).

Based on research findings, floating houses on the Musi River have not yet been systematically subjected to PBB. This is due to several considerations, including the unclear legal status of the locations of floating houses on the river and the absence of technical policies regarding the assessment of the Tax Object Selling Value (NJOP) for floating houses. NJOP determination is a crucial factor in calculating the amount of PBB owed. Research indicates that NJOP is set based on market conditions and the

characteristics of the tax object, which directly affects total PBB revenue in the study area (Sari & Indonesia, 2023).

According to Waluyo (waluyo, 2017), one of the main requirements for tax collection is legal certainty regarding the tax object and taxpayer. In the context of floating houses, the uncertainty of the tax object's status becomes an obstacle for local governments to designate them as PBB objects. Furthermore, local governments must also consider the social and economic aspects of floating house residents, most of whom have low incomes. This aligns with the principle of tax justice, which stipulates that taxation should be in accordance with the taxpayer's ability (Indah Nazulfa, Siti Destia Wulandari, Siti Masitoh & Hidayat, 1776).

Although the PBB revenue from floating houses is expected to be relatively small, its collection holds strategic value in promoting fiscal equity, as all structures that are used permanently should contribute to regional revenue. According to the Deputy Minister of Home Affairs, Bima Arya, in general, the Rural and Urban Land and Building Tax (PBB-P2) remains a primary mainstay for most cities and regencies, particularly in regions that have implemented digitalization in the registration of tax objects. As a result, this tax has become a major source of Local Own-Source Revenue (PAD) across Indonesia (Anggi Muliawati, 2025).

Therefore, the prospect of collecting PBB on floating houses is more relevant as an instrument for administrative management and legal certainty, rather than solely as a source for increasing Regional Original Revenue (PAD).

3.2 Obstacles in the Determination of Land and Building Tax (PBB) on Floating Houses in the Musi River.

a. Legal and Regulatory Challenges.

The main challenge in levying Land and Building Tax (PBB) on floating houses is the absence of specific regulations governing them as taxable objects. The Palembang Regional Revenue Agency (Bapenda) emphasizes that floating houses are not explicitly mentioned in tax laws or local regulations. The legal uncertainty surrounding floating houses—particularly regarding their permanence or mobility and ownership rights over the water—means that PBB collection currently lacks a solid legal basis.

b. Administrative and Technical Assessment Challenges

From an administrative perspective, although Seberang Ulu I District has data on the number and distribution of floating houses, the Regional Revenue Agency (Bapenda) does not yet have official data regarding floating houses as objects of rural and urban Land and Building Tax (PBB-P2). In addition, the assessment of the Tax Object Sale Value (NJOP) for floating houses faces challenges due to the absence of a specific valuation method suited to the characteristics of buildings on water. The floating nature of these houses and their location on inland waters complicate the application of conventional valuation methods used for buildings on land.

c. Socio-Economic and Cultural Challenges

The socio-economic aspect also poses a significant challenge in the imposition of property tax (PBB) on floating houses. Residents of these floating houses generally have limited economic means and lack access to basic government services. Additionally, floating houses are part of the local wisdom and cultural heritage of Palembang, so taxation policies need to consider their historical and social value. Both Bapenda and the sub-district authorities agree that without a persuasive approach and adequate socialization, the collection of PBB on floating houses could potentially lead to objections or resistance from the community.

d. Synthesis of Answers to the Research Questions

Based on the results and discussion above, it can be concluded that the prospect of collecting Land and Building Tax (PBB) on floating houses along the Musi River in Palembang City remains open both normatively and conceptually, considering that these floating houses have clear functions, permanence, and ownership. However, the implementation of PBB collection has not been fully realized due to legal, administrative, technical, and socio-cultural constraints.

Therefore, the collection of PBB on floating houses requires the formulation of specific regulations, strengthening of data collection and inter-agency coordination, as well as a policy approach that is fair and sensitive to the community's conditions and local wisdom.

The main findings indicate that floating houses along the Musi River factually possess the characteristics of buildings, including residential and commercial functions, relative permanence, and clear ownership. Based on the definition of buildings under the PBB-P2 regime, floating houses conceptually and normatively have the potential to be classified as objects of Land and Building Tax. However, the implementation of PBB collection on floating houses has not been carried out optimally due to the absence of specific regulations governing their status as taxable objects, limitations in valuation mechanisms for determining the Tax Object Sales Value (Nilai Jual Objek Pajak/NJOP) of buildings over water, and socio-economic and cultural considerations affecting floating house communities. This study also finds that the fiscal contribution of floating houses to Local Own-Source Revenue (Pendapatan Asli Daerah/PAD) is likely to be insignificant in nominal terms. Therefore, the imposition of PBB on floating houses is more relevant as an instrument for administrative structuring and legal certainty rather than merely as a means of increasing local revenue.

Compared to previous research, this study demonstrates significant differences. Earlier studies on buildings over water have generally focused on issues of settlement legality, spatial planning, or environmental protection, without directly linking such structures to local tax regimes, particularly PBB-P2. Meanwhile, studies on Land and Building Tax have predominantly examined conventional buildings constructed on land with clearly defined land tenure. This research complements and extends prior studies by positioning floating houses as the primary object of analysis within the context of local taxation. Unlike earlier research that emphasized revenue potential alone, this study highlights that the core issues surrounding the taxation of floating houses lie in legal certainty, valuation mechanisms, and social justice considerations. Accordingly, this study offers a new perspective that the imposition of Land and Building Tax on traditional water-based structures should be understood as part of a fair and socially sensitive fiscal policy that respects local wisdom, rather than solely as a revenue-generating instrument.

4. Conclusions

Based on the formulation of the problems and the research objectives regarding the collection of Land and Building Tax (PBB) on floating houses along the Musi River in Palembang City, the following conclusions can be drawn: (a) Regarding the prospect of collecting Land and Building Tax (PBB) on floating houses along the Musi River, conceptually and legally, the collection has the potential to be implemented because floating houses can be regarded as buildings that are actively utilized by taxpayers. However, this prospect cannot yet be realized optimally due to the absence of specific and clear legal regulations designating floating houses as objects of Land and Building Tax, meaning that its implementation remains at the level of normative potential rather than an operational fiscal policy. (b) Regarding the obstacles in the imposition of Land and Building Tax (PBB) on floating houses along the Musi River, the main challenge lies in the lack of legal certainty concerning the status of floating houses, whether as permanent or movable structures, as well as the absence of a clear and measurable basis for property tax assessment. This situation results in the local government not having adequate administrative and technical foundations to collect PBB without potentially causing legal and social issues.

Therefore, the collection of Land and Building Tax (PBB) on floating houses along the Musi River in Palembang remains ineffective and inequitable until specific regulations and technical policies are established to govern their status, valuation, and tax collection mechanisms. The prospect of collecting Land and Building Tax (PBB) on floating houses in Palembang City can be realized through: The establishment of a specific regional regulation that classifies floating houses as a particular type of local tax object; Alternative imposition of local taxes or levies other than PBB-P2 that are more suitable for the characteristics of floating houses; An affirmative policy approach, such as special rates or certain exemptions, to protect low-income communities. With such special regulations in place, the taxation of floating houses would not only be legally valid but also uphold the principles of justice, legal certainty, and public benefit.

The success of collecting Land and Building Tax (PBB) on floating houses along the Musi River in Palembang City is not measured solely by the increase in local revenue, but also through three main indicators. First, taxpayer compliance, reflected in the level of adherence of floating house owners in reporting and paying PBB on time, with minimal arrears or tax disputes. Second, legal certainty, which indicates the existence of clear and binding legal provisions regarding the status of floating houses as taxable objects, including the availability of a transparent Tax Object Sales Value (NJOP) assessment mechanism and minimal potential for legal disputes. Third, social acceptance, referring to the level of community support and awareness regarding the tax policy, including active participation, minimal resistance or objections, and the perception that the policy is fair and in accordance with the economic capacity of floating house owners. These three indicators serve as essential benchmarks to ensure that the collection of PBB on floating houses is not only legally valid but also socially accepted and administratively effective.

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