

Juridical Analysis of Hotel Building Permits In The City Center: Administrative Compliance and Environmental Impact Study of Vermont Hotel Construction In Bukittinggi City

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Abstract

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The growth of the tourism sector has encouraged an increase in hotel construction in the downtown area, including in Bukittinggi City as a historical tourist city. The construction of Hotel P, which is located in the strategic area of Jam Gadang, has raised debates related to administrative compliance, spatial suitability, and urban environmental impact. This study aims to analyze the suitability of the licensing process for the construction of Hotel P with the provisions of state administrative law, spatial planning regulations, and environmental protection instruments. The research uses a normative juridical approach combined with empirical juridical through the analysis of regulations, licensing documents, and urban environmental data for the 2020–2022 period. Environmental impact is analyzed using the Principal Component Analysis (PCA)-based Environmental Pressure Index which includes indicators of waste volume, noise levels, and green open space reduction. The results of the study showed indications of inconsistencies between licensing documents and factual conditions in the field, weak licensing transparency, and a significant increase in environmental pressure. This study emphasizes the importance of strengthening administrative law enforcement, integrating environmental evaluation in the licensing process, and applying the principles of good environmental governance in hotel construction in urban core

Keywords: Development permits, hotels, spatial planning, administrative law, environmental pressure

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INTRODUCTION

The construction of hotels in the historic downtown area is an inseparable phenomenon from the dynamics of urban tourism growth. However, various recent studies show that urban densification and the development of tourist accommodation in the core areas of cities tend to increase environmental pressure if not controlled through substantive and performance-based licensing governance (Li et al., 2022; Zhang et al., 2023). Bukittinggi City as a historical tourist city faces these conditions in real terms, considering the limited space, the high intensity of tourist activities, and the ecological vulnerability of the downtown area.

In the context of urban environmental governance, the quality of institutions and oversight mechanisms play a more decisive role than the mere existence of formal regulations. Newig et al. (2022) emphasized that the effectiveness of environmental policies is highly dependent on transparency, monitoring, and public

involvement in the decision-making process. Without these elements, the licensing system has the potential to produce pseudo-compliance that is unable to withstand the rate of environmental degradation.

Urban development is essentially a historical process that reflects the relationship between power, economy, and space management. In the context of historic cities in Indonesia, the dynamics of development cannot be separated from the colonial heritage that shapes the spatial structure, regional function, and logic of regional control. The city of Bukittinggi is a representative example of a city that from its inception was designed as a colonial administrative, military, and economic center, before transforming into a modern tourist city with increasingly intensive development pressure.

The history of Bukittinggi City began with a Minangkabau village which was then developed by the Dutch colonial government in the early 19th century. The construction of Fort de Kock in 1825 became the starting point for the transformation of Bukittinggi into a strategic colonial city in the interior of Sumatra. The fort not only served as a military headquarters, but also as a center of administrative and economic control for the Minangkabau region. From Fort de Kock, the spatial structure of the city was formed hierarchically with centers of activity organized and tightly controlled by the colonial authorities.

In subsequent developments, Bukittinggi was designed as a resting place for the colonial elite. The cool climate, strategic topography, and distinctive natural scenery made the city a recreation center for colonial officials. Urban infrastructure is built taking into account spatial order, urban aesthetics, and clear socio-economic functions. The downtown area, including the area now known as Jam Gadang, was designed as a major public space that integrated the functions of trade, administration, and social interaction.

The legacy of colonial spatial planning leaves a strong structural footprint to the present day. The road pattern, area zoning, and distribution of spatial functions in the center of Bukittinggi City still reflect the initial design that prioritizes regularity and control of development intensity. However, along with the change in the post-independence political and economic regime, the function of the city underwent a significant shift. Bukittinggi is no longer just a regional administrative center, but is developing into a leading tourist destination with a high dependence on the service and tourism sectors.

The transformation of Bukittinggi into a tourist city has consequences for the pattern of space utilization. The city center, which was previously designed with limited capacity, is now facing pressure due to increased trade, services, and tourism activities. The Gadang Clock as an icon of the city not only serves as a historical symbol, but also becomes an economic magnet that attracts large-scale commercial investment. It is in this context that the construction of hotels in the downtown area becomes an inevitable phenomenon.

The construction of hotels in urban areas, especially in historic tourist cities, always contains paradoxes. On the one hand, hotels are needed to support tourism activities and regional economic growth. On the other hand, large-scale hotel construction has the potential to disrupt the balance of space, reduce environmental quality, and erode the historical value of the area. This tension is even more

complex when development is carried out in urban center areas that have limited space and low environmental carrying capacity.

In the context of Bukittinggi City, the construction of Hotel P is a concrete example of this paradox. The hotel was built in the downtown area adjacent to Jam Gadang, an area that historically and symbolically has high strategic value. The location is within the city's core zone of activity with already high levels of density, limited green open space, and urban environmental systems that are vulnerable to additional pressures.

The construction of Hotel P not only raises technical building issues, but also opens up juridical debates regarding administrative compliance, spatial suitability, and environmental implications. Various questions arise regarding the permit issuance process, transparency of procedures, and the effectiveness of local government supervision. These issues show that the construction of hotels in the center of Bukittinggi City is not just an investment issue, but a matter of spatial and environmental governance.

Normatively, hotel construction in urban areas is subject to the legal regime of state administration, spatial planning, and environmental protection. Licensing functions as a preventive control instrument that aims to ensure that every development activity is in line with the public interest and does not cause negative impacts that exceed the limits of environmental tolerance. In this framework, permits cannot be understood as administrative formalities, but rather as a substantive mechanism to control the impact of development.

However, the practice of development permitting in many regions shows a tendency to formalize. Compliance is measured based on the completeness of administrative documents, not on the effectiveness of environmental impact control and spatial planning. This phenomenon has intensified after the enactment of Law Number 11 of 2020 concerning Job Creation which simplifies licensing procedures through a risk-based approach. While aimed at improving efficiency and ease of investment, this policy raises concerns about weakening environmental controls, especially in historic urban areas.

In the context of the construction of Hotel P, there are indications that the licensing process emphasizes more procedural aspects than the substance of impact control. The issue of spatial suitability, building intensity, and environmental impact management are issues that continue to be debated. This condition shows that there is a gap between normative goals of regulation and implementation practices in the field.

From an environmental perspective, the construction of hotels in the center of Bukittinggi City has the potential to increase ecological pressure through various mechanisms. The increase in the number of tourists and hotel activities has implications for the increased volume of garbage, increased noise, and pressure on the already limited green open space. In addition, the water and energy consumption of hotels can put a strain on urban environmental systems that have limited capacity.

These environmental pressures cannot be seen as incidental impacts, but rather as a structural consequence of development patterns that are not integrated with the carrying capacity of the environment. In the context of a historic city such as Bukittinggi, environmental degradation also has implications for the decline in

the quality of public spaces and the erosion of heritage values that are the main attraction of tourism.

Although various regulations have regulated development permits and environmental protection, the effectiveness of their implementation is still a problem. Many studies of spatial planning law in Indonesia still focus on normative analysis of regulations without linking them to actual environmental conditions. In contrast, urban environmental studies often measure ecological impacts without tracing their juridical roots in the permitting and local governance processes.

The gap between normative and empirical studies creates a gray area in the evaluation of urban development. Without an analysis that links administrative compliance to measurable environmental impacts, the law has the potential to lose its function as an instrument of development control. In this context, the construction of Hotel P is a relevant case study to examine the extent to which the licensing regime is able to control environmental pressures in the historic downtown area.

This research positions the construction of Hotel P not as an individual case, but as a representation of the dynamics of hotel construction in historic tourist cities in Indonesia. The focus of the research is directed at the analysis of the administrative suitability of permits, compliance with spatial planning provisions, and the environmental implications caused. By integrating juridical analysis and environmental pressure measurement, this study seeks to provide a comprehensive picture of the effectiveness of licensing as a development control instrument.

Thus, this introduction emphasizes that the problem of hotel construction in the center of Bukittinggi City cannot be partially understood. It is the result of historical interaction between the legacy of colonial spatial planning, the dynamics of modern economic development, and the administrative legal regime that governs the use of space and the environment. The analysis of the construction of Hotel P is expected to contribute to strengthening urban development governance that is more sustainable, transparent, and environmentally just.

Literature Review

Licensing as an Instrument of Control in State Administrative Law

Administrative compliance in urban development cannot be understood solely as the fulfillment of formal procedures. The international literature shows that failure to integrate between formal institutions and substantive oversight mechanisms will result in environmental pressures that are cumulative and difficult to recover (Bodin & Tengö, 2023). In this context, substantive administrative compliance is a key prerequisite for the effectiveness of environmental law.

In the development of tourist cities, environmental pressure often arises as a consequence of weak control of space utilization. Studies on tourist cities show that hotel construction in urban centers increases the environmental burden through increased waste generation, noise, and conversion of green open spaces (Zhang et al., 2023; Sun et al., 2024). Therefore, spatial planning and permitting must be positioned as an instrument of ecological control, not just a mechanism for legalizing development.

From the perspective of state administrative law, licensing is the main instrument of the state to control the activities of the community and business actors

so that they are in line with the public interest. Hadjon emphasized that a permit is not just an administrative approval, but a state administrative decision that is constitutive and determines the legality of an action. Thus, licensing contains a preventive function that aims to prevent negative impacts before an activity is carried out.

In the context of hotel construction, licensing has a higher complexity because it is directly related to the use of space, the environment, and the public interest. Hotel construction permits do not stand alone, but are a series of interrelated administrative decisions, ranging from the suitability of space utilization activities, environmental approvals, to building permits and operational permits. Inconsistencies or administrative defects at one of these stages have the potential to have legal implications for the overall legality of development.

However, the literature shows that licensing practices at the regional level often undergo a shift in function. Licensing tends to be treated as an instrument of investment facilitation, rather than as a substantive control tool. This phenomenon causes what is called administrative compliance bias, which is compliance measured based on the completeness of documents, not on the achievement of the normative goals of the regulation.

Administrative Compliance: Formalism versus Substance

The concept of administrative compliance in public law can be differentiated into formal compliance and substantive compliance. Formal compliance refers to the fulfillment of procedural and administrative requirements as stipulated in laws and regulations. Meanwhile, substantive compliance relates to the extent to which regulatory objectives, particularly environmental protection and the public interest, are actually achieved in practice.

In urban development, the distinction between formal and substantive compliance is often a source of problems. Many development projects are declared administratively valid because they have obtained permits, but in practice they have a significant environmental impact. This condition suggests that formal administrative compliance is not always directly proportional to substantive compliance with environmental protection goals.

The environmental law literature emphasizes that the effectiveness of permits cannot be measured only by the existence of permits, but by the ability of these permits to control environmental impacts in real terms. Therefore, the analysis of administrative compliance should be directed at a substantive evaluation of the ecological implications of development activities.

Urban Spatial Planning and Historic Areas

Spatial planning is a public policy instrument that functions to regulate the sustainable use of space. In the urban context, spatial planning not only regulates the distribution of spatial functions, but also serves as a mechanism for density control, protection of strategic areas, and conservation of historical value.

The historic downtown area has special characteristics that distinguish it from other urban areas. This area generally has limited space, high density of activities, and strong symbolic and cultural values. Therefore, physical development in the area requires stricter control through spatial planning regulations and permits.

Various studies show that violations of spatial planning provisions in historic areas have the potential to cause environmental degradation, deterioration of the visual quality of cities, and erosion of heritage values. In this context, spatial planning must be understood as an instrument of environmental and cultural protection, not merely a tool of technical regulation of buildings.

Based on the study of the legal theory of state administration, spatial planning, and urban environment, this study develops a conceptual framework that places **administrative compliance of licensing** as the main control instrument for hotel construction in urban centers. Administrative compliance in this study is not understood narrowly as the completeness of formal documents, but as **substantive compliance**, namely the conformity between licensing procedures, the implementation of spatial planning provisions, and the effectiveness of environmental impact control.

Urban Environmental Pressures and Hotel Construction

Urban environmental pressure is a concept used to describe conditions when human activities exceed the carrying capacity and carrying capacity of the environment. In the context of hotel construction, environmental pressures can arise through increased waste generation, noise, water and energy consumption, and the conversion of green open spaces.

Empirical research shows that hotel construction in dense urban areas contributes significantly to increased environmental pressure, especially if environmental impact management is not carried out comprehensively. These pressures are cumulative and often not immediately noticeable in the short term, but have a serious impact on the sustainability of the urban environment in the long term.

Therefore, measuring environmental pressure through quantitative indicators is important to evaluate the effectiveness of licensing and spatial planning policies.

Research Conceptual Framework

In this framework, administrative compliance includes three main dimensions, namely: (1) the conformity of development permits with the spatial plan and zoning provisions of the downtown area, (2) the fulfillment of environmental approval obligations and impact management instruments, and (3) the effectiveness of supervision and enforcement of administrative laws by local governments.

These three dimensions are positioned as **structural control variables** that determine whether the hotel construction operates within the limits of carrying capacity and the carrying capacity of the urban environment.

Meanwhile, **urban environmental pressure** is positioned as **an outcome variable**, representing the empirical consequences of development licensing practices. Environmental pressure is measured through quantitative indicators that reflect changes in environmental quality around hotel locations, including an increase in waste volume, an increase in noise levels, and a decrease in green open space. These indicators were chosen because they are directly related to hotel operational activities and the sensitivity of the downtown area.

The basic assumption underlying this conceptual framework is that **weak substantive administrative compliance will increase environmental pressures in a measurable** manner, even if development activities have been formally permitted. Thus, this study confirms that administrative legality does not automatically guarantee environmental sustainability, if licensing is not carried out as a substantive control instrument.

This conceptual framework strengthens the socio-legal approach in the study of environmental law by linking legal norms (*das sollen*) and factual environmental conditions (*das sein*) through empirical indicators. Thus, the effectiveness of administrative law in urban development is evaluated not only from the existence of permits, but from the ecological impact generated on the ground.



Figure 1. Conceptual Framework of Research

This framework shows the relationship between licensing administrative compliance as a controlling variable and urban environmental pressure as an outcome variable. Administrative compliance is understood substantively, including spatial suitability, environmental approval, and administrative supervision. Environmental pressure is measured quantitatively through indicators of waste volume, noise, and green open space degradation compiled in the Environmental Pressure Index.

RESEARCH METHODOLOGY

The formation of the Environmental Pressure Index in this study uses a composite index approach based on Principal Component Analysis (PCA), which is widely recommended in cutting-edge urban sustainability evaluation studies. This approach allows for the integration of multiple environmental indicators into a single measure of pressure that is representative and comparable across time (Wang et al., 2022; Sun et al., 2024). The use of PCA was also considered effective in reducing subjectivity bias in environmental impact assessments.

This study uses a socio-legal approach by combining normative juridical analysis and empirical juridical analysis. This approach was chosen to bridge the gap between legal norms and the practice of implementing hotel development permits at the regional level.

A normative juridical approach is used to analyze the laws and regulations that govern development licensing, spatial planning, and environmental protection. Analysis was carried out on the regulatory hierarchy, legal principles, and consistency of norms between regulations. This approach aims to identify the administrative compliance standards that should be met in the construction of hotels in the downtown area.

An empirical juridical approach is used to assess the application of such legal norms in practice. Empirical data was obtained through the analysis of licensing documents, reports of local government agencies, and urban environmental data for the 2020–2022 period. This approach allows for an assessment of the conformity between legal norms and factual conditions on the ground.

The type of research is descriptive-analytical with a focus on the relationship between licensing administrative compliance and environmental pressures. The research does not aim to test statistical causal relationships, but to analyze the substantive linkages between legal and environmental aspects. Environmental impact analysis is carried out by forming an Environmental Pressure Index using Principal Component Analysis. This method was chosen because it is able to integrate several environmental indicators into one representative composite index. All indicators are normalized using z-score to ensure proportionality of measurement scales.

The validity of the indicator is determined based on the theoretical relevance and availability of the data. The limitation of this study lies in the limited number of environmental indicators, but the indicators used are considered representative to describe environmental pressure in the urban center area.

RESULTS AND DISCUSSION

Administrative Compliance of Hotel Development Permits P

The results of the analysis showed a significant increase in the Environmental Pressure Index in the area around Hotel P. These findings are consistent with the results of studies in other tourist cities that experience densification and weak spatial control, where hotel construction in the downtown area is correlated with a measurable increase in environmental pressure (Zhang et al., 2023; Li et al., 2022). This fact reinforces the argument that formal administrative compliance is not enough to guarantee the sustainability of the urban environment. The results of the analysis show that the construction of Hotel P normatively has met the licensing stages as required in the regime of state administrative law, spatial planning, and environmental protection. The available licensing documents indicate that the necessary administrative approvals have been issued, so that the construction of the hotel can be formally categorized as legal under positive law. However, formal administrative compliance does not necessarily reflect substantive administrative compliance.

In the perspective of state administrative law, permits do not only function as formal legitimacy, but as an instrument of preventive control to ensure that an activity does not have an impact that is contrary to the public interest (Hadjon, 2017). Therefore, the effectiveness of licensing should be measured by its ability to control real impacts on the ground, not solely by the existence of administrative documents. The findings of this study show that the post-issuance supervision mechanism for the construction permit of Hotel P has not been carried out systematically and sustainably, especially in environmental impact control.

The weakness is reflected in the incompatibility between administrative legality and actual ecological conditions. The analysis of spatial planning suitability shows that public verification of the consistency of permits with RTRW and RDTR in the central area of Bukittinggi City is relatively limited. In addition, supervision of the implementation of environmental obligations tends to be reactive, carried out after complaints or impacts arise, not as part of the preventive control attached to the permit. This condition is in line with the findings of Ostrom (2010) who emphasized that weak monitoring and enforcement mechanisms in resource management will result in pseudo-compliance and gradual environmental degradation.

Empirically, the weak substantive administrative compliance correlates with increased environmental pressure around hotel locations. The results of the Principal Component Analysis (PCA) based Environmental Pressure Index analysis showed a significant trend of increasing environmental pressure during the observation period. This correlation strengthens the argument that the construction permit of Hotel P has not functioned optimally as an instrument of ecological control, but rather acts as an administrative legitimacy for development activities. These findings are in line with the international literature that confirms that procedural regulatory compliance tends to fail to control environmental impacts if it is not supported by substantive oversight and indicator-based evaluations (Gunningham, Kagan, & Thornton, 2003; Blackman, 2010). In the urban context, such failures often lead to increased environmental pressures that are cumulative and difficult to recover from in the long term.

Thus, the findings of this study confirm the existence of an *administrative compliance gap*, which is the gap between formal administrative compliance and substantive achievements of environmental protection. This gap becomes even more problematic when development is carried out in historic downtown areas with limited environmental carrying capacity. Without the repositioning of licensing as an active control instrument based on measurable environmental evaluation, administrative law risks losing its ecological function in urban development governance.

To assess the empirical implications of licensing administrative compliance, this study established an **Environmental Pressure Index** using Principal Component Analysis (PCA). This approach allows the integration of multiple environmental indicators into a single composite index that quantitatively represents the ecological pressures of the hotel area (Hair et al., 2019).

The indicators used include the daily volume of waste, the level of environmental noise, and the percentage decrease in green open space in the radius around the hotel location. All indicators are normalized in the form of z-scores to ensure scale

comparability, then analyzed to obtain the main factors with the greatest eigenvalues.

Table 1. Environmental Indicators and PCA Results

Environmental Indicators	Factor Loading (λ)
Daily waste volume	0,60
Noise level	0,55
Decrease in RTH	0,58

The results of the PCA show that the three indicators have a relatively high and unidirectional loading factor, so it is feasible to combine them in one environmental pressure index. The main factor formed has an eigenvalue above 1 and explains the largest proportion of data variations, so it was chosen as the Hotel Area Environmental Pressure Index.

The environmental pressure index is then calculated using the equation:

$$ft=0.60Z1t+0.55Z2t+0.58Z3t$$

Table 2. Annual Environmental Pressure Index

Year	Index Value (ft)	Klasifikasi
2020	-1,82	Low
2021	0,23	Medium
2022	1,59	Height

The results of the calculation showed a consistent increase in environmental pressure during the observation period. In 2020, environmental pressure is still in the low category. However, in 2022, the value of the index increased to the high category. This trend shows that hotel construction and operational activities have put real pressure on the environmental carrying capacity of the downtown area.

This increase in the environmental pressure index reinforces the finding in Subchapter 4.1 that administrative compliance of permits has not been substantively running. Although permits have been formally issued, environmental impact control has not been able to withstand the rate of increasing ecological pressures. This condition is in line with the findings of the Q1 literature which states that the effectiveness of environmental regulation is highly dependent on the integration of environmental performance-based licensing, monitoring, and enforcement (Potoski & Prakash, 2005; Darnall, Henriques, & Sadorsky, 2010).

Thus, the Environmental Pressure Index in this study serves as an evaluative instrument that bridges the normative analysis of administrative law with the ecological reality in the field. This index shows that administrative legality without substantive oversight is not enough to guarantee the sustainability of the urban environment, especially in historic downtown areas such as Bukittinggi.

Juridical Implications for Urban Environmental Governance

Juridically, the findings of this study confirm that the licensing mechanism for hotel construction in the central area of Bukittinggi City has not fully functioned as **an effective environmental and spatial control instrument**. Although formal permits have been issued in accordance with administrative provisions, weak post-permit supervision and evaluation show that the legal function tends to be reduced to a tool of development legitimacy, rather than an instrument of environmental protection. This condition reflects a shift in administrative legal functions from

preventive control to *procedural compliance*, which conceptually undermines the main purpose of environmental regulation.

From the perspective of environmental administration law, permits should act as *an ex ante control instrument* that binds business actors to the limits of environmental carrying capacity and allows the state to carry out corrective interventions on a sustainable basis (Gunningham, Kagan, & Thornton, 2003). However, the empirical findings of this study show that administrative supervision of the construction of Hotel P has not been carried out systematically and based on environmental performance. As a result, permits lose their regulatory power and are unable to prevent quantitatively measured increases in environmental pressure through Environmental Pressure Index (PCA).

These findings are in line with the international Q1 literature which confirms that **regulatory failure** in urban environmental management is often not caused by the absence of regulation, but by weak indicator-based monitoring, enforcement, and evaluation mechanisms (Blackman, 2010; Darnall et al., 2010). In this context, administrative compliance measured only through the completeness of documents is not enough to guarantee environmental protection. Without substantive oversight, permitting has the potential to create an *illusion of compliance*, which is a condition in which development appears administratively legal but fails ecologically.

Furthermore, Ostrom (2010) emphasized that effective environmental governance requires a multi-layered and information-based monitoring system that can be verified. When local governments do not integrate measurable environmental indicators into the licensing and monitoring system, regulations lose their adaptive capacity in responding to changing environmental conditions. The findings of the increase in the Environmental Pressure Index in this study indicate that the hotel development licensing system in Bukittinggi has not met the *adaptive governance* principles required for historic downtown areas with limited carrying capacity.

From the perspective of spatial planning law, the weak function of licensing control also has implications for the degradation of spatial planning as a normative instrument. RTRW and RDTR should be the main reference in issuing permits and controlling the use of space. However, when the suitability of the permit with the spatial planning provisions is not strictly and transparently supervised, the spatial plan risks becoming a symbolic document without substantive binding. This condition reinforces the criticism that spatial planning in many cities has developed into a *regulatory façade* that is ineffective in limiting development pressures (Healey, 2007).

The findings of this study strengthen the argument that **administrative compliance must be understood substantively**, that is, measured from the achievement of environmental protection and the preservation of urban spatial function. Without the integration of environmental evaluations based on quantitative indicators, such as the Environmental Pressure Index, hotel development permits risk becoming an administrative formality that is incapable of effectively controlling environmental stress. Thus, administrative legality can no longer be positioned as the sole indicator of the success of urban development governance.

Regional Policy Recommendations

Based on these juridical implications, this study recommends several regional policy steps that are operational and evidence-based:

- a. **Integration of Environmental Indicators in the Licensing System**
Local governments need to integrate quantitative environmental pressure indicators into the licensing evaluation and post-permit monitoring process. Any hotel development in the downtown area should be evaluated periodically based on measurable environmental indicators, not just on formal administrative compliance.
- b. **Strengthening Substantive Administrative Supervision**
Licensing supervision needs to be repositioned from a reactive approach to preventive and sustainable. Local governments must establish data-driven environmental monitoring mechanisms that allow for early detection of increased environmental pressure and the application of proportionate administrative sanctions.
- c. **Transparency and Public Access to Licensing Documents**
To strengthen accountability, hotel construction licensing documents, including compliance with the RTRW and RDTR, need to be transparently disclosed to the public. This practice is in line with the principles *of good environmental governance* and has been proven to increase the compliance of business actors (Prakash & Potoski, 2006).
- d. **Repositioning Permits as Ecological Control Instruments**
Hotel development permits should be treated as dynamic ecological control instruments, not as static approvals. Any significant breach or increase in environmental pressure should be the basis for a re-evaluation of the permit, including the possibility of restricting or revoking the permit in accordance with the provisions of administrative law.
- e.

CONCLUSION

The failure of licensing to control environmental pressures shows the weak integration between formal regulation and adaptive monitoring mechanisms. Bodin and Tengö (2023) emphasized that effective environmental governance requires a layered monitoring system that is able to respond to social-ecological dynamics in an adaptive manner. Without the integration of quantitative environmental indicators in the licensing system, administrative law risks losing its ecological function. This study concludes that the construction of Hotel P in the center of Bukittinggi City has formally fulfilled the licensing stages as required in the state administrative legal regime. However, the administrative compliance identified is more procedural than substantive. The administrative legality that is possessed is not fully followed by effective environmental control, supervision, and evaluation mechanisms as referred to in the principles of environmental protection and spatial planning.

Empirical findings based on Environmental Pressure Index formed through Principal Component Analysis show a significant increase in environmental pressure during the observation period. The increase in the volume of waste, the increase in noise levels, and the decrease in green open space occurred simultaneously and measurably, even though the construction and operation of the

hotel had obtained administrative permits. This fact confirms the gap between formal administrative compliance and substantive achievements of environmental protection, which in the study of environmental administration law is known as the administrative compliance gap.

Juridically, this condition shows that hotel construction permits have not functioned optimally as an instrument for controlling the urban environment. Weak post-permit supervision, limited transparency of spatial suitability, and lack of integration of quantitative environmental indicators in the licensing system cause administrative law to tend to play a role as a formal legitimacy of development, rather than as a mechanism to prevent environmental degradation. In the context of historic city center areas with limited carrying capacity such as Bukittinggi, this failure of control functions has the potential to accelerate the deterioration of environmental quality and reduce the sustainability of urban space.

This study emphasizes that administrative compliance in urban development must be understood substantively, which is measured from the ability of licensing to maintain a balance between the interests of economic development and environmental protection. Without the integration of measurable indicator-based environmental evaluations and ongoing administrative oversight, licensing risks becoming an ineffective formality in controlling environmental pressures.

Conceptually and practically, this study contributes by integrating juridical analysis of licensing and quantitative environmental pressure measurement as the basis for evaluating the governance of hotel development in the downtown area. This approach reinforces the argument that the effectiveness of environmental law cannot be judged solely from the existence of permits, but must be tested through real ecological impacts on the ground. Thus, this study recommends strengthening regional licensing governance based on substantive supervision, public transparency, and sustainable environmental evaluation as a prerequisite for sustainable urban tourism development.

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