

Title: Manapat vs. Court of Appeals and National Housing Authority (G.R. No. 116176, G.R. Nos. 116491-503, G.R. No. 110478)

Facts:

These consolidated cases revolve around expropriation proceedings for parcels of land part of the Grace Park Subdivision, Caloocan City, originally owned by the Roman Catholic Archbishop of Manila (RCAM) and/or the Philippine Realty Corporation (PRC). In the 1960s, RCAM allowed individuals to occupy the property with a condition to vacate if needed. The occupants later sought to purchase the land and, unable to afford the price, petitioned the Government for acquisition and resale to them. Government efforts to negotiate a purchase with RCAM being unsuccessful, resulted in RCAM subdividing and selling the lots, which were bought by individuals including petitioners Manapat and Lim and respondents in the consolidated cases.

In 1977, the government, through Presidential Decree (PD) No. 1072 and the National Housing Authority (NHA), sought to expropriate already subdivided lots for the Zonal Improvement Program (ZIP). The Regional Trial Court (RTC) dismissed most of the expropriation cases filed, but later, upon motion for reconsideration by NHA, condemned several lots for expropriation.

Appeals were filed to the Court of Appeals (CA) by both NHA and the landowners. The CA ordered the expropriation of the contested parcels and remanded the cases for the determination of just compensation, except for certain specific instances and lots. This led to the petitions filed before the Supreme Court.

Issues:

1. Whether there is genuine necessity for the expropriation of the properties for public use.
2. Whether the parcels of land subjected to expropriation satisfy the “public use” requirement under eminent domain.
3. The application of Presidential Decree No. 1072 and its implications on the expropriation proceedings.
4. The legality of the CA’s retroactive application of R.A. No. 7279 to exempt certain lots from expropriation.

Court’s Decision:

The Supreme Court affirmed the decisions of the Court of Appeals, holding that the expropriation proceedings were valid as all requisites for the valid exercise of the power of

eminent domain were complied with. The Court clarified that “public use” had been adequately fulfilled as the parcels were to be used for the Zonal Improvement Program as part of a larger “socialized housing” program, and that PD No. 1072 rendered the issue of necessity a political question not subject to judicial intervention. The Court also reversed the CA’s application of R.A. No. 7279 to exempt certain lots from expropriation, explaining that laws should have a prospective, not retroactive effect unless explicitly stated.

Doctrine:

1. The power of eminent domain is inherent in the state and can be exercised subject to the limitations set by the constitution and existing laws.
2. The notion of “public use” for the exercise of eminent domain is a flexible and evolving concept that may extend to programs aimed at the general welfare, such as socialized housing.
3. The necessity for exercising eminent domain, when directed by legislative act, becomes a political question outside the ambit of judicial review.

Class Notes:

- Crucial elements of eminent domain include private property, necessity, public use, just compensation, and due process.
- Public use under eminent domain has evolved to encompass a broad array of public benefits, including socialized housing and urban development.
- Laws governing or affecting eminent domain, such as R.A. No. 7279, typically do not have retroactive effects unless expressly stipulated.

Historical Background:

The consolidated cases highlight a protracted and complex legal battle involving the government’s effort to acquire urban lands for socialized housing and urban development. The use of the power of eminent domain, initiated through PD No. 1072 under President Marcos’s regime, reflected the government’s interventionist approach to addressing urban housing needs. The legal challenges encountered underscore the tensions between private property rights and public welfare objectives in the context of urban development in the Philippines.