

Title:

Sangalang v. Intermediate Appellate Court

Facts:

In the 1970s, Ayala Corporation developed Bel-Air Village in Makati, Metro Manila, a residential subdivision with limited access roads. Streets such as Jupiter Street and Orbit Street were donated to Bel-Air Village Association, Inc. (BAVA) under the condition that they would be used for public access under reasonable conditions.

On October 24, 1979, BAVA filed a petition for prohibition and damages with a preliminary injunction against the Mayor of Makati, Nemesio T. Yabut, and other officials for opening Jupiter and Orbit Streets to vehicular traffic to alleviate congestion. BAVA claimed this opening illegally deprived them of their property and exceeded the Mayor's jurisdiction.

The trial court denied the applicant's motion for a temporary restraining order and preliminary injunction, leading BAVA to file an urgent motion for reconsideration, which was similarly denied. Respondents contended that the subdivision plan required these streets open for public access, validating the Municipality's actions under the public welfare doctrine and police powers.

BAVA appealed the denial of the preliminary injunction to the Intermediate Appellate Court, which later ruled against the opening up of Jupiter and Orbit Streets based on the lack of annotations on the title as required by the Land Registration Act.

Discontented, BAVA and other petitioners (Sangalang spouses and other intervenors) brought the matter to the Supreme Court, challenging the validity of the Mayor's actions.

Issues:

1. ****Validity of Opening Jupiter and Orbit Streets**** - Whether the Mayor of Makati had the legal authority to open Jupiter and Orbit Streets to public vehicular traffic.
2. ****Due Process and Compensation Claims**** - Whether the opening of these streets amounts to deprivation of property without due process and just compensation.
3. ****Police Power Justification**** - Whether the Mayor's actions can be justified under the police power of the State.
4. ****Existence and Relevance of Annotations**** - Whether the lack of specific annotations in the certificates of title precluded opening these streets to public use.

Court's Decision:

The Supreme Court resolved each issue as follows:

1. **Validity of Opening Jupiter and Orbit Streets**:

The Court upheld the Mayor's opening of the streets, determining it as consistent with public welfare and within the jurisdiction of local government authority. It acknowledged the deed of donation obliging these roads to be open to public traffic under reasonable conditions.

2. **Due Process and Compensation Claims**:

The claim of deprivation without due process and compensation was dismissed. The Court ruled there was no "taking" of property as envisioned under eminent domain; instead, the action taken was a legitimate exercise of police power for public benefit.

3. **Police Power Justification**:

The ruling emphasized that Jupiter and Orbit Streets' opening was a valid exercise of police power aimed at reducing traffic congestion, enhancing public safety, and serving the general welfare, paramount to individual property rights in this context.

4. **Existence and Relevance of Annotations**:

The Court rejected the assertion that the absence of specific annotations invalidated the street opening. It noted that general conditions in the certificate titles suffice, and, legally, such actions complied under the principle of public necessity inherently part of property development regulations.

Doctrine:

1. **Police Power** - An inherent and plenary sovereign power enabling the government to enact legislation impacting property use for public welfare without necessarily providing compensation (Art. 436, Civil Code).
2. **Public Welfare Supremacy** - Individual property rights may be overridden by broader public interest and necessity through police power's proper application.

Class Notes:

- **Police Power** (Art. 436, Civil Code):
 - Imposition of restraint upon liberty or property for common good.
 - Not confined within narrow legal precedents; flexible to societal conditions.
- **Due Process in Property Use**:
 - Public welfare and safety can justify municipal actions affecting property use if non-

arbitrary.

- ****Annotations on Titles (Section 50, P.D. 1529; Section 44, Act No. 496)**:**
- Necessary for street/public passageway delineations but can be generally implied under conditions of public necessity.

Historical Background:

In the 1970s, urban development in the Philippines, particularly in Metro Manila, posed significant planning challenges, including traffic congestion and efficient traffic management. This backdrop forms the core conflict in *Sangalang v. Intermediate Appellate Court* - a struggle between private residential enclaves and the demands of urban public utility. The ruling underscores infrastructure facilitation and public accessibility essential for evolving urban landscapes, amid increasing population and vehicular density, marking a crucial juncture in land use governance and municipal authority's valued role.