

# Declaration

## of the Collective *Bas les PAD*

### March 12, 2020

**It is urgent to stop the double process of deregulation of the legal framework and weakening of the public debate which brings us back to the years of the first "Brusselization" of 50 years ago.**

The *Bas les PAD* collective brings together many residents, neighbourhood committees, associations and federations active in the fields of the environment, spatial planning, sustainable development and housing in the Brussels Region.

After having mobilised separately, we took the decision to coordinate our actions independently of the political parties represented in the Parliament of the Brussels-Capital Region.

*Bas les PAD* is alarmed by the recent proliferation of unsuitable and disproportionate urban projects.

During the last revision of Brussels Code for Spatial Planning (CoBAT/BWRO), the Region created a new legal tool, called the Territorial Development Plan (TDP), better known in French as PAD (Plan d'Aménagement Directeur) or in Flemish as RPA (Richtplan van Aanleg). In an area determined by the government, a TDP will supersede any contradicting regulation and plan.

The analysis of the eight TDPs in progress, who already passed the public consultation, leads us to the following three main observations :

#### **1. the TDP causes the breakdown of the regulatory framework as a whole:**

By making it possible to derogate from all the other town planning rules, the TDPs are a double-edged sword too powerful today and who contribute to the deregulation implemented by the government (at all levels of the Brussels regulatory hierarchy).

The final adoption of the TDPs would endorse a myriad of unmeasured and unsuitable projects, most of which have already been conceived before, but were often hindered so far for various reasons (notably legal). This new regulatory tool therefore appears to be legalising what was not possible before. It is the expression of an outdated vision on urban planning.

#### **2. the TDP contributes to the weakening of the public debate:**

The too rare information sessions instead of public consultations, the insufficient duration of public inquiries and the biased nature of the environmental impact reports that accompany them or the absence of a meeting of the consultation committee, are all signs of a worrying decline in citizen participation around issues related to the city and the living environment of its inhabitants and users, a decline taking place in parallel with the deregulation process.

#### **3. the TDP is the expression of an outdated vision on urban planning:**

Despite the good intentions regarding the need for accessible housing and public facilities or the objectives of carbon neutrality and preservation of biodiversity, the solutions proposed are far from being a match for the social and ecological crisis (climate and loss of biodiversity) that the Region must face. The intended developments are too often a brutal disruption of the existing urban fabric. On the

other hand, they claim to be the only response to the demographic growth, which has been revised downwards and does not correspond to the proposed projects. The concept of the TDPs is not being evaluated nor are its effects monitored. Neither does it show any trace of adaptability required for a public instrument anticipating several decades.

**We first ask for the adoption of a moratorium  
on the TDPs pending an evaluation of this instrument  
through a public debate!**

By taking a common position, *Bas les PAD* also intends to:

- **Coordinate** our actions in order to strengthen, with the support of the federations, the specific positions of the committees and associations which have mobilized against the breakdown of our regulatory framework and in favor of better collective participation in the development of our Region;
- **Revitalize** the public debate in decline on issues of urban development in general and on the conception of the TDP in particular, in order to get out of the dire legal and technical situation in which it is currently caught;
- **Interpellate** the responsible politicians in Brussels regarding an urban planning tool which opens the door to speculation by the big financial players at the expense of the inhabitants of Brussels;
- **Encourage** the Government and the Parliament to modify the Brussels Code for Spatial Planning by integrating more efficient evaluation and participation processes;
- **Demand** to preserve public domain, namely to develop the public domain, too scarce in Brussels, in order to be able to respond with greater command to the social, environmental and economic challenges of today and tomorrow.

**Supports of *Bas les PAD***

*ARAU* ([jm.bleus@arau.org](mailto:jm.bleus@arau.org)), the *BRAL* urban movement, Inter-Environment Brussels (*IEB* - [claire.scohier@ieb.be](mailto:claire.scohier@ieb.be)), *NATAGORA*, La Plaine, Hippodrome de Boisfort, Wolu-Inter-Quartiers (*WIQ*) and the Association of Committees of Ucclois district (*ACQU*)

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**And to contact each TDP respectively:**

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