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international council on monuments and sites

Heritage Alert: Immediate threat to the urban forest of Jingu Gaien, Tokyo, Japan 3.4 ha parkland and approximately 3,000 heritage trees lost to redevelopment

Press Release
7 September 2023

ICOMOS, together with its Japanese National Committee and International Scientific Committee on Cultural Landscapes, is issuing a Heritage Alert calling for the withdrawal of the Jingu Gaien redevelopment project – including the plan to cut down over 3,000 trees - scheduled to begin in September 2023. This is vital to ensure the preservation and continuity of the core of the Tokyo Garden City Park System, in existence since the 17th century.

The planned construction of three high-rise buildings as well as the replacement and relocation of the existing baseball and rugby stadiums with new stadiums, will lead to the complete destruction of the urban forest that has been formed and nurtured over the past 100 years.

The project proponents are Mitsui Fudosan Co. Ltd., Meiji Jingu Shrine, the Japan Sports Council, and Itochu Co. Ltd. The Tokyo Metropolitan Government has approved the redevelopment plan in the absence of proper dialogue with local citizens and other stakeholders.

Urban parks are places for people's recreation and also contribute to maintaining rich biodiversity. They mitigate the heat island effect in cities and provide shelter in case of natural disasters such as major earthquakes. Jingu Gaien, created through donations and voluntary work of citizens, represents an outstanding cultural heritage, unparalleled in the history of urban parks world-wide.

In light of the above, ICOMOS is issuing this Heritage Alert and calls upon:

1. The project proponents - Mitsui Fudosan Co. Ltd., Meiji Jingu Shrine, Japan Sports Council, and Itochu Co. Ltd. – to immediately withdraw the redevelopment project of Jingu Gaien, fulfilling their social and ethical responsibilities as an international corporation, a religious association, and a fair and honest promoter of sports;
2. The Tokyo Metropolitan Government to review the relevant city planning decisions, recognizing that its decision to remove this urban park in favor of the construction of skyscrapers' will permanently deprive citizens of their right to use the park and that the environmental impact assessment carried out for the redevelopment project has fundamental flaws and needs to be re-examined on the basis of best practice methodology;
3. The Meiji Jingu Shrine to immediately withdraw from the project, considering that Jingu Gaien was created thanks to the donations and voluntary labor provided by citizens, on the understanding that the promise to "maintain it as a beautiful park for eternity" would be fulfilled;
4. The Minato, Shinjuku, and Shibuya Wards to work on ensuring that Jingu Gaien is designated as a Place of Scenic Beauty, in the interest of future generations.
5. The national government of Japan to intervene, and not consider this a problem of Tokyo only.

ICOMOS Japan has presented an alternative plan that does not involve the cutting down of numerous trees and prevents the carbon emissions that would result from the present plans. ICOMOS calls for the creation of a forum where diverse stakeholders can contribute to discussion on the future of the park.

[Read the full letter sent by ICOMOS](#)

Contact: ICOMOS Japan - [jpicomos\[at\]japan-icomos.org](mailto:jpicomos@japan-icomos.org)

The International Council on Monuments and Sites (ICOMOS) is a unique non-governmental, not-for-profit international organisation committed to furthering the conservation, protection, use and enhancement of the world's cultural heritage. ICOMOS is dedicated to the development of common doctrines, the evolution and dissemination of knowledge, the creation of improved conservation techniques, and the promotion of cultural heritage significance. It has built a solid philosophical, doctrinal and managerial framework for the sustainable conservation of heritage around the world. As an official advisory body to the World Heritage Committee for the implementation of the UNESCO World Heritage Convention, ICOMOS evaluates nominations and advises on the state of conservation of properties inscribed on the World Heritage List.

ICOMOS Japan, the National Committee of ICOMOS in Japan, has almost 500 members.

www.icomos.org

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Immutable Infrastructure Supporting Urban Vitality Garden City Park System in Tokyo since 17th Century

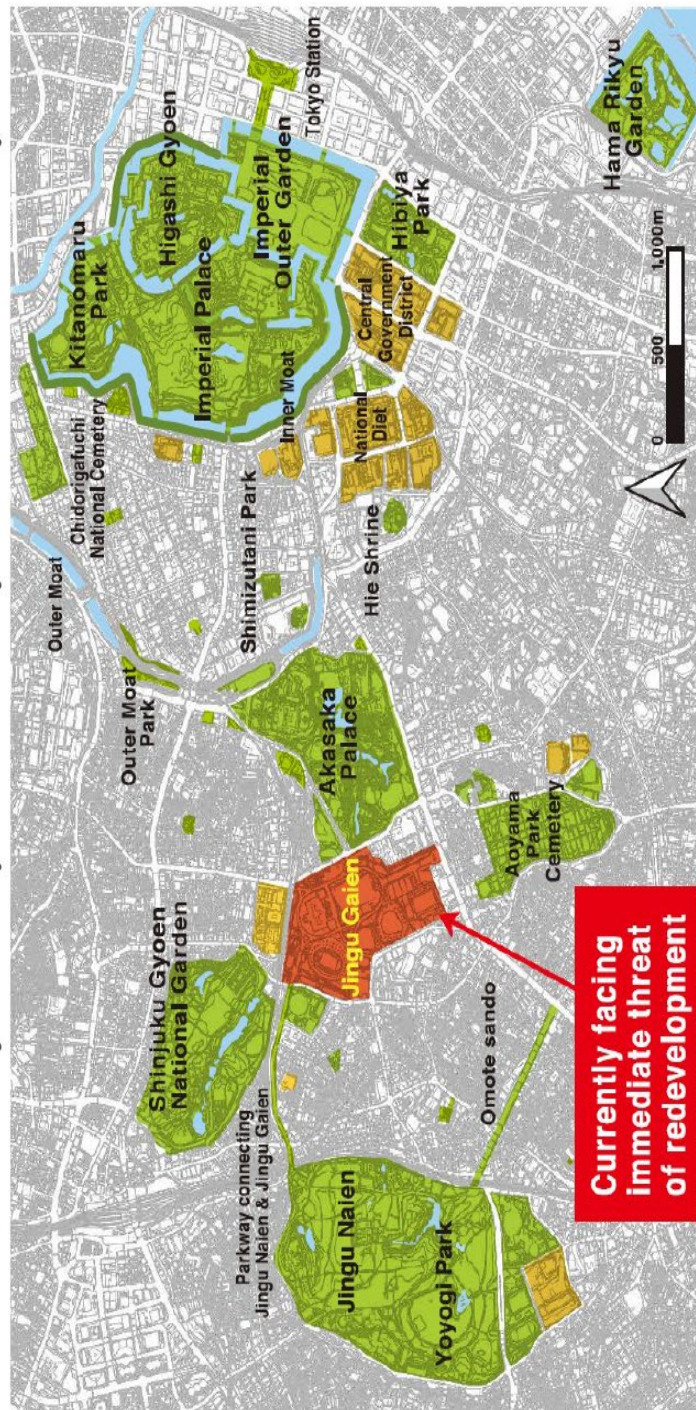


Fig.1 - Jingu Gaien, the core of the Garden City Park System, facing immediate threat by urban redevelopment

Created by Laboratory of Green Infrastructure in Research and Development Initiative, Chuo University. Graphics by graphic designers Noriko & Isao Tsunoi.

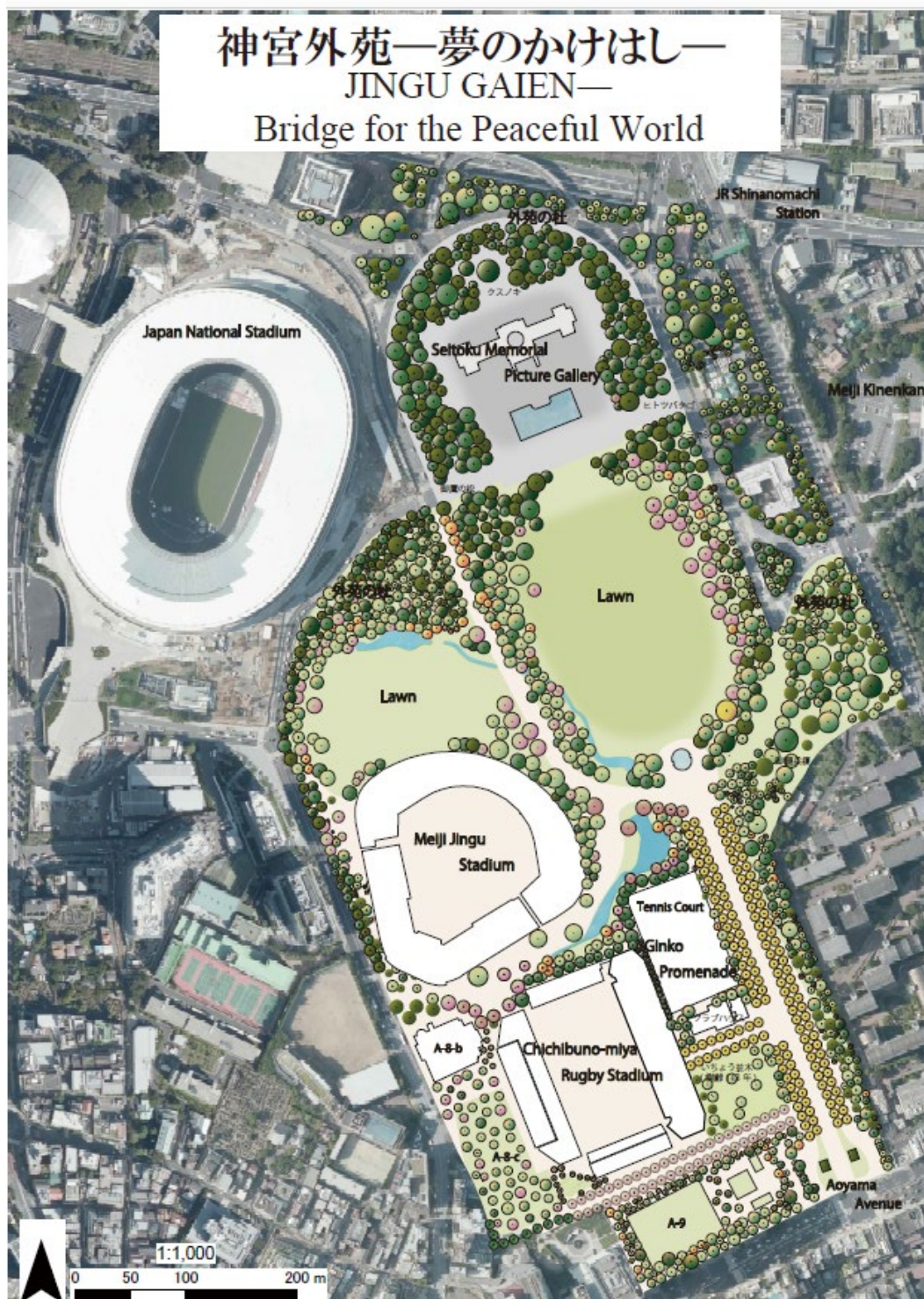


Fig. 2 – Alternative Proposal by ICOMOS Japan: Jingu Gaien--A bridge for the Peaceful World
Created by Laboratory of Green Infrastructure in Research and Development Initiative, Chuo University.

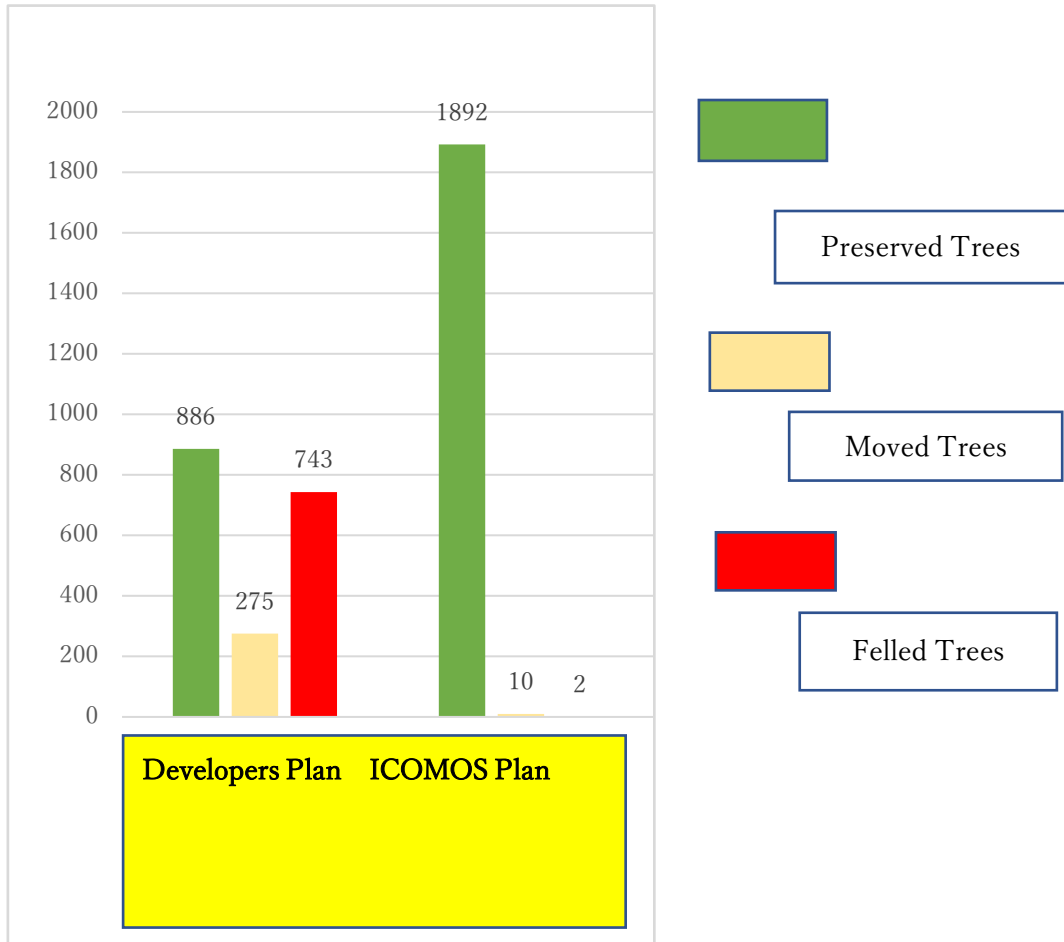


Fig. 3 - Comparison of Number of Trees (Preserved/Moved/Felled) between Developer's Plan and ICOMOS Plan



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Appendix 1

March 29, 2023

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Statement calling for a withdrawal of Jingu Gaien Redevelopment Plan

Jingu Gaien created and nurtured by the people of Japan, is a public space that represents the modern era of Japan, and its beautiful park landscape is a cultural heritage that we are proud to share with the world. The redevelopment plan for Jingu Gaien has been approved by Tokyo Metropolitan Government (TMG) in March 2022 and the project is currently underway by a corporate group.

Since last year, as the details of this plan were becoming clear, ICOMOS Japan conducted on-site investigations and have come to the conclusion that this redevelopment project, under the guise of good urban development, will greatly damage Jingu Gaien where the Ginkgo promenade and historic trees have been preserved very well through the efforts of many people.

This is not compatible with the report of the project promoter who conducted the environmental impact assessment. Nevertheless, TMG has accepted the report and is proceeding with procedures that ignore the wishes of the people, such as making decisions that reduce the park area and approving projects without responding to errors and unscientific methodologies in the environmental impact assessment report.

ICOMOS Japan cannot afford to overlook this redevelopment. Since Dec. 2021, when we submitted our opinions on the "City Planning Jingu Gaien Area District Plan" to the Tokyo Metropolitan Government, we have visited the Bureau of Urban Development and the Bureau of Environment of the Tokyo Metropolitan Government, and offered many proposals and requests both to the developers and TMG, as shown in the attached



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sheet. During this period, the Environment Bureau of TMG encouraged dialogue between the developers and ICOMOS Japan, but unfortunately, the developers did not respond to our requests, and TMG never took the opportunity to respond in any way. The redevelopment project of Jingu Gaien began without any changes to the original plan.

It is clear that Jingu Gaien is now in a critical condition. This redevelopment project will eventually destroy this precious cultural heritage in Tokyo. ICOMOS Japan urges TMG and the developers, to take heed of the voices of the people who cherish Jingu Gaien, as well as the voices of the residents and people from all over the world, and to change this redevelopment plan as quickly and as profoundly as possible.



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List of documents issued by ICOMOS Japan regarding the Jingu Gaien Redevelopment Project

Website: [ICOMOS Japan](http://www.icomos-japan.org)

March 7, 2023: Request for verification of pedestrian traffic safety caused by the relocation of Chichibunomiya Rugby Stadium and pending tree cutting.

March 7, 2023: Request for the preservation of "Jingu Gaien Kasumigaoka Gate" to be destroyed by the relocation of Chichibunomiya Rugby Stadium.

February 20, 2023: Request for the answer from the developers about the "false report" identified by ICOMOS Japan regarding the environment assessment report.

January 29, 2023: Urgent Request - Request pursuant to Article 91, Paragraph 1, Item 5 of the Tokyo Metropolitan Ordinance on Environmental Impact Assessment.

January 23, 2023: Request for Retrial of Environmental Impact Assessment Report, concerning destruction of ecosystems caused from unscientific methodologies on surveys, forecasts, and assessments; Unsustainable forest mitigation due to massive tree cutting and inappropriate transplanting plans; Destruction of the cultural heritage created by the power of citizens.

December 25, 2022: Urgent Request: Do not "lift the restriction on implementation" (Article 61 of the ordinance) by "public notice" (Article 59, Paragraph 1 of the TMG Environmental Impact Assessment Ordinance).

December 24, 2022: Urgent Request for a "review of fine root cutting and ring peeling treatment" and for the introduction of the comprehensive study of ginkgo trees toward permanent conservation.

December 16, 2022: Urgent Survey Report, "Ginko Promenade of Jingu Gaien"

October 3, 2022: Proposal for conservation and succession of Jingu Gaien, a cultural heritage representing public space in modern Japan - Toward Conservation of "Urban Green Space, as Common Social Capital".



ICOMOS Japan

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April 26, 2022: Proposal to avoid cutting down trees and restore Jingu Gaien, a masterpiece of modern Japan.

February 7, 2022: Proposal for the succession to the future of Jingu Gaien, an outstanding cultural heritage created by the public's donation, dedication and service.

February 1, 2022: Trees planned to be cut down or transplanted according to the Jingu Gaien Area District Plan.

December 28, 2021: Opinion on the " City Planning Jingu Gaien Area District Plan"

Appendix 2

Resolution to Protect the Natural, Historical and Cultural Value of Jingu Gaien

Jingu Gaien (Meiji Jingu Outer Gardens) was originally created in the Taisho period (1912-1926) as an integral part of the sacred forest of the Meiji Jingu Shrine, which was built in dedication to the deceased Emperor Meiji. In honor of the legacy of Emperor Meiji, many people from all over Japan participated as volunteers in its creation. The trees planted by them at that time are now over 100 years old, providing precious open space for people's recreation rich in natural features and exhibiting historical and cultural value that is appreciated not only by Japanese people but also internationally. It can be considered to be an early example that is compatible with the United Nations' Sustainable Development Goals that we advocate today. It also serves as an evacuation site for local residents of the broad surrounding area in the event of a disaster.

However, the Jingu Gaien redevelopment project recently permitted by the Tokyo Metropolitan Government has a number of issues of grave concern, including the cutting of thousands of trees, the re-construction of a baseball stadium threatening to kill some of the beautiful ginkgo trees, and eventually to destroy the ginkgo promenade, negative visual impacts to be caused by new skyscrapers, and the possibility of people suffering from stronger "building winds".

To protect the present wonderful scenic beauty and rich natural features of Jingu Gaien, together with its economic value benefitting the surrounding area, too, as well as its venerable historical value, we strongly request that the ginkgo promenades of Jingu Gaien be designated and protected by the national government of Japan as a Place of Scenic Beauty under the Law for the Protection of Cultural Properties and that the redevelopment project of Jingu Gaien be fundamentally reviewed and duly revised.

December 2022

Diet Members Caucus for the Protection of
Nature, History, and Culture of Jingu Gaien

Hajime Funada, Member, House of Representatives of Japan
Leader of the Diet Members Caucus



Diet Members Caucus for the Protection of Nature, History, and Culture of Jingu Gaien

神宮外苑の自然と歴史・文化を守る国会議員連盟

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衆議院議員 Representatives	松本 剛明 Takeaki Matsumoto	8	自民 LDP
衆議院議員 Representatives	務台俊介 Shunsuke Mutai	4	自民 LDP
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衆議院議員 Representatives	西岡 秀子 Hideko Nishioka	2	国民 DPP
衆議院議員 Representatives	三木 圭恵 Ke-e Miki	2	維新 JRP
衆議院議員 Representatives	小野 泰輔 Taisuke Ono	1	維新 JRP
参議院議員 Councilors	山東 昭子 Akiko Santo	8	自民 LDP
参議院議員 Councilors	櫻井 充 Mitsuru Sakurai	5	自民 LDP
参議院議員 Councilors	浅尾 慶一郎 Keiichiro Asao	3	自民 LDP
参議院議員 Councilors	杉尾 秀哉 Hideya Sugio	2	立民 CDP
参議院議員 Councilors	柴 慎一 Shinichi Shiba	1	立民 CDP
参議院議員 Councilors	大塚 耕平 Kōhei Ohtsuka	4	国民 DPP
参議院議員 Councilors	上田 清司 Kiyoshi Ueda	3	国民 DPP
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参議院議員 Councilors	福島 みずほ Mizuho Fukushima	5	社民 SDP
参議院議員 Councilors	松沢 成文 Shigefumi Matsuzawa	3	維新 JRP
会派 Party	自由民主党 (LDP) Liberal Democratic Party 立憲民主党 (CDP) Constitutional Democratic Party of Japan 国民民主党 (DPP) Democratic Party For the People 日本共産党 (JCP) Japanese Communist Party 社会民主党 (SDP) Social Democratic Party 日本維新の会 (JRP) Japan Restoration Party		

June 15, 2023

RECOMMENDATIONS

To: Tokyo Governor Yuriko Koike regarding
the environmental impact assessment (EIA) of the Jingu Gaien Redevelopment
Plan

From: The Japan Branch of the International Association for Impact Assessment
(IAIA)



Emergency Recommendations

1. The Tokyo Metropolitan Government should invite ICOMOS Japan specialists to the deliberation council and hold a public discussion in order to clarify, from a scientific standpoint, whether there is any false or erroneous data in the EIA.
2. The Tokyo Metropolitan Government should withhold its approval and order the developers to stop any work until the points in questions are cleared up as the advisory body of UNESCO, ICOMOS Japan, has expressed serious concerns about the EIA.

IAIA is the world's leading academic society in the field of EIA, consisting of experts from over 120 nations and regions, which is designated as the representative organization in the field of EIA from the United Nations.

[IAIA The leading global network on impact assessment](#)

Its Japan Branch has serious concerns about the EIA of the Jingu Gaien Redevelopment Plan promoted by the Mitsui Fudosan and other three companies, and makes recommendations to take appropriate measures to secure sustainability, which is the primary objective of EIA.

Concerns on the EIA

• **Flaws in the EIA Framework:** Jingu Gaien is a rare urban park in the world, established in 1926 by the public donating money, trees, and voluntary labor. Ever since, this public space has served as a valuable oasis in central Tokyo, serving not only the citizens of Tokyo but also visitors from both Japan and abroad. The EIA of this redevelopment plan, however, has not assessed the true value of Jingu Gaien. Deliberations at the Chosa Keikakusyo (survey planning) stage of the EIA, equivalent to scoping stage, were inadequate. Important items such as its historical value, which is said to be of UNESCO World Heritage level, the value of the urban green space to be

preserved, biological diversity, etc., were not appropriately assessed. The framework makes it all but impossible to assess the negative impact to sustainability.

• **Lack of Scientific Analysis:** In the deliberation of the Draft EIA Report stage, flaws in the data were pointed out repeatedly with regard to the ecosystems and the avenue of ginkgo trees in the area, but the EIA Report was approved in January 2023 without the developers providing adequate information. Just before that, however, ICOMOS Japan (the Japan committee of ICOMOS, the advisory body of UNESCO), based on detailed on-site investigation, pointed out that the EIA Report contains many false data. Ken-ichiro Yanagi, Chairperson of the Deliberation Council, saying the Council could not give the go-ahead as is, asked the developers to produce counterevidence. The counterevidence by the developers was produced at the general meeting of the Deliberation Council held in April and May, but, without the presence of the ICOMOS Japan experts who pointed out the flaw, the meeting ended up being just a one-sided explanation by the developers, with only perfunctory scientific discussion.

• **EIA Process Management Issues:** ICOMOS Japan, based on the decision of the board of its directors, has provided concrete data for 58 items (according to the answers from the developer) to point out that the EIA Report contains many false data and the developers have the responsibility to produce concrete data as counterevidence. For this to happen, the Tokyo Metropolitan Government office should have withheld the approval of the EIA Report and invite both the ICOMOS Japan experts along with the developers to hold public discussions, but this has not taken place yet.

It is for these reasons that the IAIA Japan Branch has made the Emergency Recommendations above.

IAIA Japan Branch

Representative

Harashina, Sachihiko, Ph.D.

President, Chiba University of Commerce

Past President of IAIA

Sub-Representative

Tanaka, Akira, Ph.D.

Professor, Tokyo City University

Secretariat General

Murayama, Takehiko, Ph.D.

Professor, Tokyo Institute of Technology



Appendix 4

Letter from Musician Ryuichi Sakamoto to the Governor of Tokyo Metropolitan Government (Translated from Japanese)



Musician, Ryuichi Sakamoto 2013
© [KAB America](#) – Sourced on Wikimedia

Feb.24, 2023

Dear Ms Yoriko Koike,
Governor of Tokyo Metropolitan Government,

Please excuse my abrupt letter.

I am Ryuichi Sakamoto, a musician.
I would like to tell you my thoughts on the redevelopment of Jingu Gaien.
Please read on.

Frankly speaking, we should not sacrifice the precious Jingu trees that our predecessors have spent a century protecting and nurturing for immediate economic gain.
These trees can benefit everybody, but from the development, only a handful of wealthy people will benefit.
These trees are nature itself, and once lost, they can never be regained.

In New York City, where I live, in 2007, the Mayor at that time, Bloomberg launched a project to plant one million trees in the city. This was based on environmental and mental health considerations, social justice, and above all, goals for the future. It is a profound thought for the next generation.
Following the lead of NY City, afforestation campaigns are underway in Boston, LA, and other cities in the USA.

Now, people all around the world are working toward the realization of the SDGs. However, the development of Jingu Gaien is far from sustainability.

If you are going to achieve sustainability, you should suspend the Jingu Gaien redevelopment project that is currently underway, and review the plan totally so that we can hand these trees to our future children.

You should clearly identify that Tokyo is a "sanctuary of the city and nature" and take the political initiative to achieve this goal. I believe that you will win the admiration from the world.

For protecting Jingu Gaien forever, I respectfully request that you will take this opportunity to designate Jingu Gaien as a Place of Scenic Beauty.

I am looking forward to your leadership.

Ryuichi Sakamoto
<https://www.tokyo-np.co.jp/article/243643>