

# ICOMOS

INTERNATIONAL COUNCIL ON MONUMENTS AND SITES  
CONSEIL INTERNATIONAL DES MONUMENTS ET DES SITES  
CONSEJO INTERNACIONAL DE MONUMENTOS Y SITIOS  
МЕЖДУНАРОДНЫЙ СОВЕТ ПО ВОПРОСАМ ПАМЯТНИКОВ И ДОСТОПРИМЕЧАТЕЛЬНЫХ МЕСТ

Our Ref.: TP/GJ/75

Paris, 7 September 2023

For the attention of:

The Honorable Fumio Kishida  
Prime Minister of Japan

The Honorable Tetsuo Saito  
Minister of Land, Infrastructure and  
Transport

The Honorable Akihiro Nishimura  
Minister of Environment

The Honorable Keiko Nagaoka  
Minister of Education, Culture, Sports,  
Science and Technology

Mr Shun'ichi Tokura  
Commissioner for Cultural Affairs

Ms Yuriko Koike,  
Governor of Tokyo Metropolitan  
Government

Mr Shigeki Miyake,  
Chairman of the Tokyo Metropolitan  
Assembly

Ms Kayoko Hama  
Chairman of Tokyo Metropolitan Board  
of Education

Mr Masaaki Takei  
Mayor of Minato Ward

Mr Takaya Suzuki  
Chairman of the Minato Ward Council

Mr Ken-ichi Yoshizumi  
Mayor of Shinjuku Ward

Mr Shin-ichi Hiyama  
Chairman of the Shinjuku Ward  
Council

Mr Ken Hasebe  
Mayor of Shibuya Ward

Mr Takashi Maruyama  
Chairman of the Shibuya Ward Council

Mr Takashi Ueda  
President and Chief Executive Officer  
of Mitsui Fudosan

Mr Michinari Kujyo  
Chief priest of Meiji Jingu Shrine

Mr Keita Ishii  
President of ITOCHU corporation

Mr Satoshi Ashidate  
President of Japan Sports Council

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

Dear Madam, Sir, Your Excellency,

ICOMOS, the International Council on Monuments and Sites, is the preeminent organization representing professionals involved in conserving cultural heritage worldwide. With a membership of over 10,500 members from 130 countries, ICOMOS advocates for the preservation and protection of cultural heritage places and is an advisory body to the 1972 UNESCO World Heritage Convention.

Tokyo is one of the largest cities in the world, with a population of 14 million people. It has always taken great efforts in the preservation of its cultural heritage. At its centre, the royal forest (formerly Edo castle, present-day Imperial Palace), adorned by countless gardens and parks, has been the pride of the city since the 17th century. Particularly important to the heritage of this area of the Imperial Palace, through the inner and outer moats, are the Akasaka Palace, Jingu Gaien, Jingu Naien, and Shinjuku Gyoen, which constitute the core of an historic 20<sup>th</sup> century Garden City. During the modernization of the 1920's, the parkway system was introduced, connecting the parks with parkways as the fundamental urban plan of Tokyo.

Jingu Gaien is located in the core of this park system. It was created as a counterpart to Jingu Naien, and has a unique structure unparalleled in the history of parks around the world. Jingu Naien was intended to be an "eternal forest". In contrast, Jingu Gaien was designed to create a "forest for the people". The park forms the core of the Garden City Park System in Tokyo and is an outstanding example of a citizen-owned park, unparalleled in the history of urban parks worldwide.

However, now ICOMOS fears that Jingu Gaien is currently facing the immediate threat of destruction of approximately 3,000 trees and loss of open park space due to urban redevelopment. ICOMOS has received many communications and published articles voicing protest against this redevelopment. These include a letter from ICOMOS Japan, our National Committee in your country, and letters from Japan's National Parliament, the Japan Branch of the International Association for Impact Assessment, as well as letters from world renowned musicians and novelists. There have been more than 300 published articles in newspapers and other media, along with a petition containing more than 218,000 signatures.

In light of the above, ICOMOS is issuing a worldwide Heritage Alert, our most significant expression of concern, to amplify the worldwide awareness of the imminent and irreversible threats to Jingu Gaien caused from ongoing urban redevelopment.

ICOMOS Japan was made aware of the critical issues in this redevelopment plan in March 2022, upon the introduction of the Park-Urban Development program and the District Plan, which identified the establishment of the re-development district. The plan eliminated a 3.5 ha area of the Meiji city park now designated to build mixed-use skyscrapers. The plan also changed the regulation of the Scenic District from a height limitation of 15m, to allow the construction of three high-rise buildings with heights of 190m, 185m, and 80m. The plan also allows for the replacement and relocation of the rugby and baseball stadiums. Overall, more than 3,000 trees will be destroyed, with more than 500 of those estimated to be over 100 years of age, and an additional 500 estimated to be over 50 years of age. ICOMOS regards this as an irreversible destruction of cultural heritage, and an unacceptable loss of open space and mature heritage trees at a time when the world response to climate change recognizes the critical importance of maintaining urban open spaces and all parts of the urban forest.

In addition to the direct loss of open space and the destruction of mature heritage trees, the construction of Jingu Stadium will critically affect the health of the allee of Gingko trees along the southeast border of the site. By inserting a 40-meter-deep piling for the stadium construction, only 6 meters from the trunks of the Gingko trees, the construction will affect the water levels in the soil, and further stress the Ginkgos. In addition, the construction of the Stadium will affect access to sunlight for the Gingko trees, which are the symbol of Jingu Gaien. This is contrary to the commitment expressed by the project proponent and Tokyo Metropolitan Government to "preserve the Ginkgo trees in perpetuity."

ICOMOS strongly warns against the construction of skyscrapers in a world-renowned park, without consultation with citizens and stakeholders.

ICOMOS calls on Mitsui Fudosan Co.Ltd., Meiji Jingu Shrine, ITOCHU Co.Ltd., and the Japan Sports Council (the entities responsible for the development), to immediately halt the urban redevelopment project and preserve Jingu Gaien for future generations.

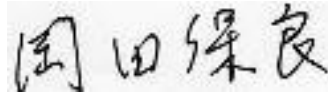
ICOMOS requests that the Tokyo Metropolitan Government (TMG), which approved the urban redevelopment project, review the city planning decision. The re-development does not conform to long established height restrictions under the City Planning Law.

ICOMOS further requests that the Environmental Assessment, which has been criticized as having numerous errors and unscientific methodologies, fulfil its social responsibilities under the TMG Environmental Assessment Ordinance, and a review be conducted.

ICOMOS is concerned that these legal procedures were carried out with little or no information provided to the public. We request that the principles of democracy be respected, and the information about the future of Jingu Gaien be widely disseminated to the public. A forum should be created where diverse stakeholders can contribute to discussion on the future of the park.

ICOMOS also requests the concerned national ministries, agencies and local governments, and their relevant departments, to make the utmost effort to ensure the preservation of this cultural heritage, and offers the full scope of professional expertise of ICOMOS Japan and our International Scientific Committee on Cultural Landscapes, as well as other expert members, to assist in ensuring a sustainable future for Jingu Gaien.

Yours sincerely,



Yasuyoshi Okada  
President of ICOMOS Japan



Teresa Patricio  
President of ICOMOS



Elizabeth Brabec  
President of ISCCL,  
ICOMOS – IFLA  
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**Attachments:**

Heritage Alert Background Information  
Press Release

**Letter sent to:**

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