

Developers’ Position on the Heritage Alert

Tokyo, Japan, September 29, 2023 – The developers of the Jingu Gaien District Urban Redevelopment Project (hereinafter, “the project”) announced today their position on the Heritage Alert issued on September 7, 2023 by the International Council on Monuments and Sites (hereinafter, “ICOMOS”) regarding the project.

The developers have been moving the project forward by properly following procedures in accordance with laws, regulations and ordinances governing urban planning and environmental impact assessments.

ICOMOS’s recently released Heritage Alert presents information that differs greatly from the details provided by the developers on the project website and other disclosures. In the Heritage Alert, ICOMOS has communicated information unilaterally based on its own understanding. Unfortunately, details that could potentially lead to multiple misconceptions have been widely reported. Accordingly, the developers would like to share their position, as described below, on statements for which they have a significantly different understanding.

The project is necessary to ensure the historic Jingu Gaien’s long-term viability over the next 100 years. Therefore, the developers respectfully request your understanding regarding the project.

1. Statements in the Heritage Alert for which the developers have a significantly different understanding

(1) Statements concerning trees

*“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.”*

*“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**”*

(Excerpted from “Heritage Alert Jingu Gaien” issued by ICOMOS Japan National Committee)

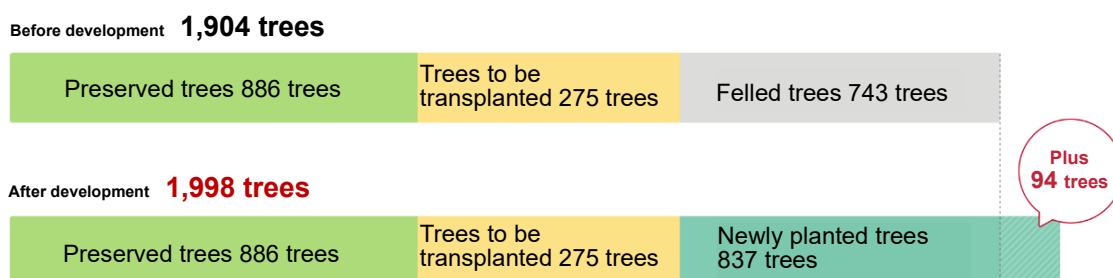
*“Jingu Gaien is currently facing the immediate threat of **destruction of approximately 3,000 trees**”*

*“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.**”*

(Excerpted from “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” issued by ICOMOS)

(1) Statement that “(more than) 3,000 trees” will be destroyed

As stated previously on the project website, the total number of felled trees at least 3.0 meters tall will be 743.

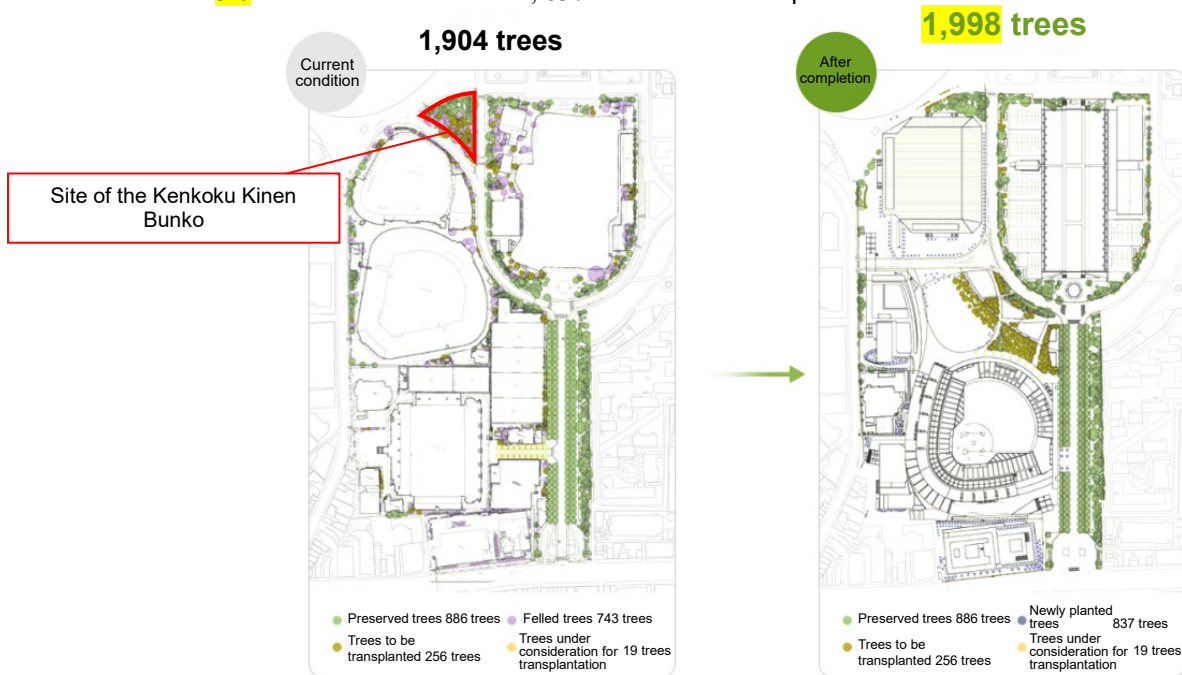


Regarding shrubs less than 3.0 meters tall, on February 28, 2023, the project obtained permission to remove such shrubs under the Tokyo Scenic District Ordinance in certain areas of the scenic districts within the project area. Under the application, the number of trees to be felled under the application was 3,028. However, approximately 90% of those trees are dense growth shrubs (azalea, etc.)*1 for which an individual tree count cannot be determined. Although the number of felled trees for the whole area, including shrubs, has not been determined, the project is planning to plant more new trees than the number of trees (including shrubs) that will be felled. The number of trees after development (including the estimated number of shrubs) is expected to increase.

*1 Example of dense growth shrubs (azaleas in plantings, etc.)



In the project, each and every existing tree will be treated with great care. The trees will be preserved or transplanted as much as possible through various means. The four rows of ginkgo trees will be preserved. Concurrently, the project will create new greenery, thereby raising the ratio of greenery area from around 25% to around 30%. The number of trees will be increased from 1,904 to 1,998. These and other details are provided on the project website and other disclosures. Although 743 trees that are at least 3.0 meters tall will be felled, 837 new trees will be planted.



(2) Statement that the project will “lead to the complete destruction of the urban forest that has been formed and nurtured over the past 100 years”

Unlike Meiji Jingu Naien’s vast forest (i.e., the forest surrounding Meiji Jingu’s main shrine buildings), the area described by some parties as a “forest” in the Gaien project area refers only to the site of the Kenkoku Kinen Bunko. This site occupies approximately 5,000 m² (approximately 1.7%) of the total project site area of approximately 28.4 hectares and has 149 existing trees that are at least 3.0 meters tall. The Heritage Alert states that in the site of the Kenkoku Kinen Bunko, “There are 65 trees over 100 years old, however, only 11 will be preserved.” It further states that “About 80% will be cut down.”^{*2} However, the developers do not have any records that may be used to determine the age of those trees.

Furthermore, of the 149 existing trees in the Kenkoku Kinen Bunko site, the project plans to preserve 58 trees and transplant 50 more, meaning that a total of 108 trees (more than 70% of the total) will be preserved or transplanted. First, the north side of the Kenkoku Kinen Bunko site will remain in its current state as a preservation area. The project plans to restore the trees and ecosystem of the Kenkoku Kinen Bunko site by transplanting approximately 112 trees from the Kenkoku Kinen Bunko and other sites to the surroundings of the cultural exchange facility and around the Central Plaza, and newly planted trees will also be placed in these areas. The developers believe that the statement that the project will “lead to the complete destruction of the forest” is far from the truth and could lead to widespread misunderstanding.

Regarding statements such as “over the past 100 years” and “trees over 50 and 100 years old,” as previously stated, the developers do not have any records that may be used to determine the ages of the trees. In addition, the 743 trees scheduled to be felled include trees that have existed since the establishment of Jingu Gaien, but they also include numerous trees that were planted to coincide with the construction and renovation of facilities in more recent years. In the project, we will treat each and every tree, including those discussed here, with great care, transplanting trees that can be transplanted, and considering ways to utilize trees that have to be cut down.

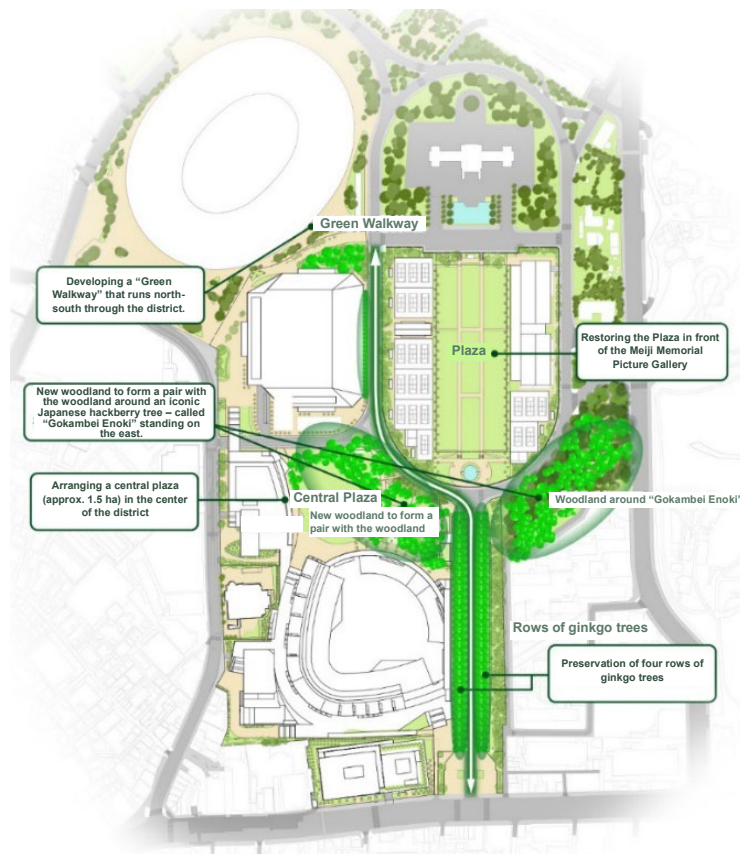
※2 : ICOMOS “Heritage Alert Jingu Gaien-Cultural Heritage as the core of Garden City Park System in Tokyo, which is facing immediate threat by urban redevelopment”,

https://www.icomos.org/images/DOCUMENTS/Secretariat/2023/Heritage_Alerts/Jingu_Gaien/HA_JinguGaien_BackGroundINformation_2023_0905_with13Appendixes_compressed.pdf, p.22 (acquired on September 7, 2023)

The developers have explained all of these matters in their responses to the “Request for a response from the project developers regarding the ‘false report’ claim made by ICOMOS Japan National Committee regarding the Jingu Gaien District Urban Area Redevelopment Project (tentative name)” dated February 20, 2023 from ICOMOS Japan National Committee in the FY2023 1st and 2nd General Meetings of the Environmental Impact Assessment Councils. The developers have confirmed that there were no errors or falsehoods in the environmental impact assessment report and have reported this fact to the General Meeting of the Tokyo Metropolitan Environmental Impact Council.

Greenery will increase throughout the whole project area through new plantings, with plans to develop a New Green Zone^{*3} comprising features such as New Woodlands and a Green Walkway.

*3 A New Green Zone comprising features such as New Woodlands and a Green Walkway.



The greenery of Jingu Gaien has been properly managed and maintained by people’s hands as the times have changed, giving rise to the environment we have today, and some of the trees have been replaced over the course of its history. Quite a few trees are in poor health due to aging, as well as facility upgrades and natural disasters in the past. To keep visitors safe, work is done on a daily basis to deal with fallen trees, broken branches, and other hazards. In the past 15 years, approximately 300 trees (withered trees) have been felled for road vehicle and pedestrian safety management reasons and approximately 600 trees have been replanted.

Regarding the Kenkoku Kinen Bunko site, temporary barriers have been set up around the site since February 2023 when work around tree roots began in preparation for the transplantation of trees in the Kenkoku Kinen Bunko. The temporary barriers are intended first and foremost to secure the safety of pedestrians, as well as to prevent unauthorized people from entering the site, reduce the impact of noise and other forms of pollution to surrounding areas, and stop the spread of dust, materials and other items beyond the construction site. The barriers were not set up with the intent “to hide the forest” of the Kenkoku Kinen Bunko as stated in the Heritage Alert.

(2) Statements concerning the four rows of ginkgo trees

“The construction of Jingu Stadium will **critically affect the health of the allee of Ginkgo trees** along the southeast border of the site.”

“**This is contrary to the commitment expressed by the project proponent and Tokyo Metropolitan Government to ‘preserve the Ginkgo trees in perpetuity.’**”

(Excerpted from “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” issued by ICOMOS)

The developers plan to preserve all four rows of ginkgo trees. The baseball stadium is currently planned to be constructed 8.0 meters from the curb of the closest rows of ginkgo trees. The facility plan will be revised as necessary to ensure the preservation of the rows of ginkgo trees, including setting back the baseball stadium from the trees, taking into account factors such as the results of ongoing root system research and the views of tree doctors.

In addition, although construction of the baseball stadium has not yet begun, the developers have confirmed since November 2019 that, in the course of Meiji Jingu's daily management, the leaves of some trees in the four rows of ginkgo trees have been observed to fall earlier than other trees. For this reason, remedial measures (soil improvement and fertilization) and watering for some ginkgo trees have been implemented, based on consultations with tree doctors and other experts.

Both last year and this year, we have confirmed that new buds developed, and leaves grew on these trees beginning in early spring. Since the end of May 2023, tree doctors and other experts have started conducting ginkgo vitality research. The research has found that the leaves of some ginkgo trees begin to change color as early as June and July.

Vitality research will be conducted this year in the spring, summer and autumn. The findings are also scheduled to be reported to the General Meeting of the Tokyo Metropolitan Environmental Impact Council.

To preserve the four rows of ginkgo trees, the developers have been implementing remedial measures and other actions to restore the health of the ginkgo trees based on their condition, prior to the start of construction of the baseball stadium, while seeking the views of tree doctors.

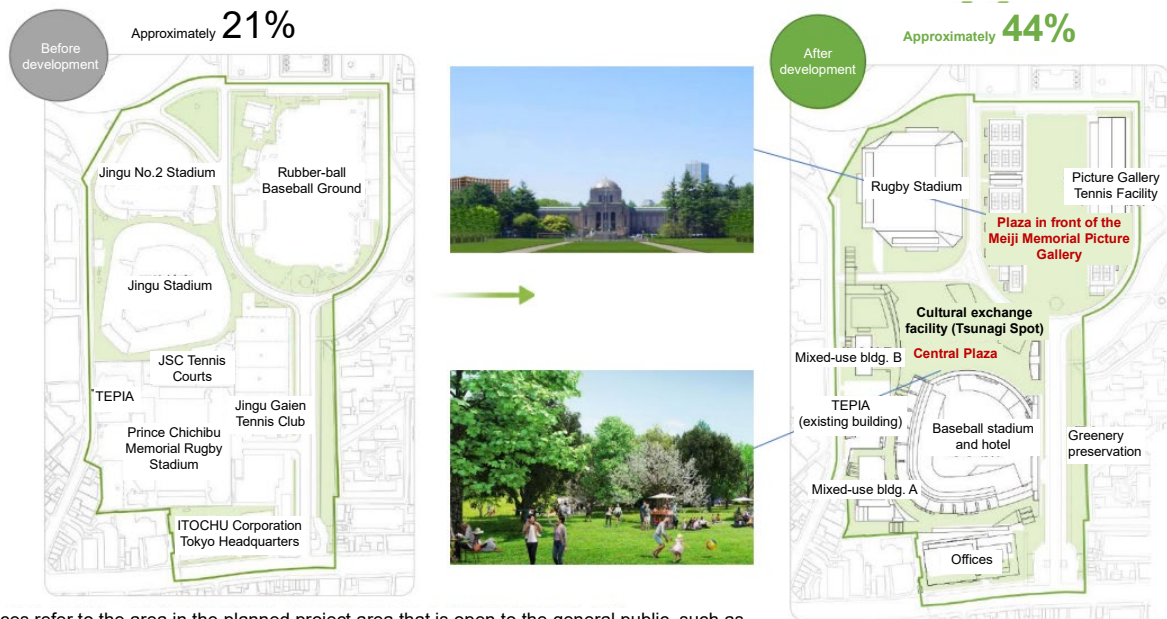
(3) Statement concerning open space

“the direct loss of open space”

(Excerpted from “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” issued by ICOMOS)

The developers recognize that a lack of plaza space and the need to maintain and improve Jingu Gaien's function as a wide-area evacuation site are current issues. With this in mind, the project will significantly expand open spaces. Open spaces, including green areas, will roughly double^{*4} from the current ratio of about 21% of the site area to about 44% of the site area after completion, and areas where visitors can come and go as they please will increase^{*5}. On the site of what is currently a rubber-ball baseball ground with restricted access based on a reservation system, the project will develop the Plaza in front of the Meiji Memorial Picture Gallery^{*6} that will be accessible to all without a reservation. This will restore the site to a new form similar to the one it had when it was first created. Additionally, a 1.5-hectare Central Plaza will be constructed between the baseball and rugby stadiums, contributing to enhanced disaster readiness as a wide-area evacuation site. The project will secure the necessary land for use as an evacuation site during the construction period.

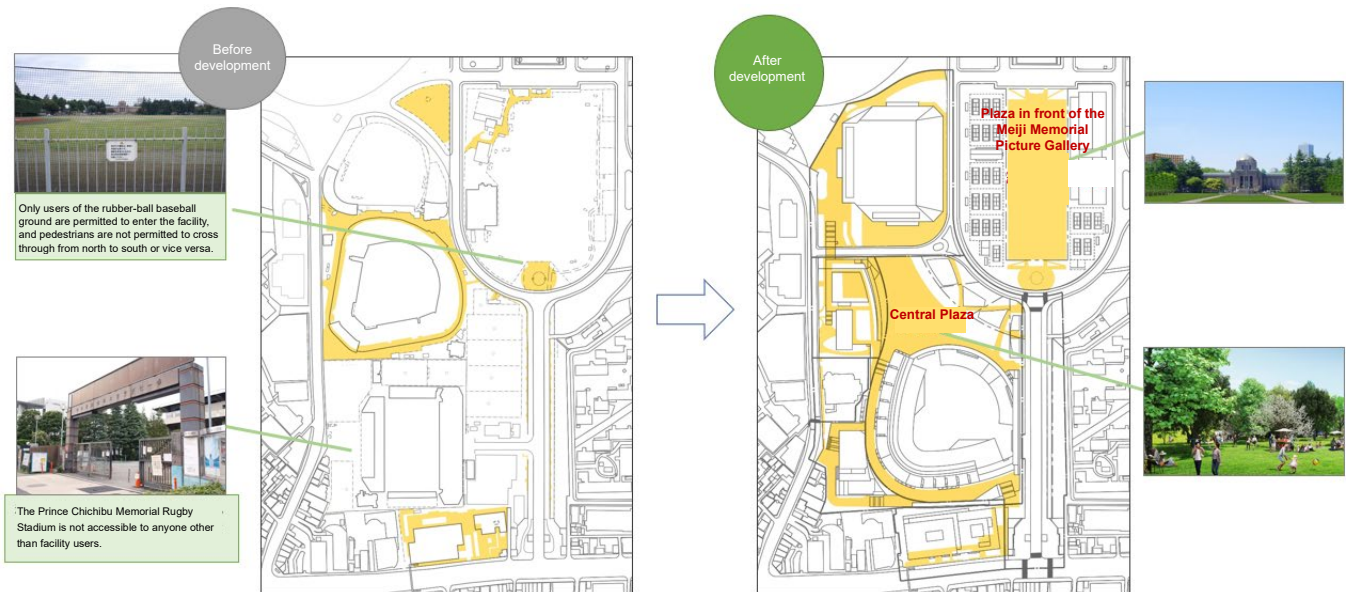
*4 Expanding Open Spaces



* Open spaces refer to the area in the planned project area that is open to the general public, such as plaza-type areas, greenery areas, pedestrian pathways and other spaces that make up integrated and continuous spaces with those areas and pathways.

* Greenery areas, etc., include sections in which public entry is restricted due to administrative control reasons.

*5 Places where visitors can come and go as they please

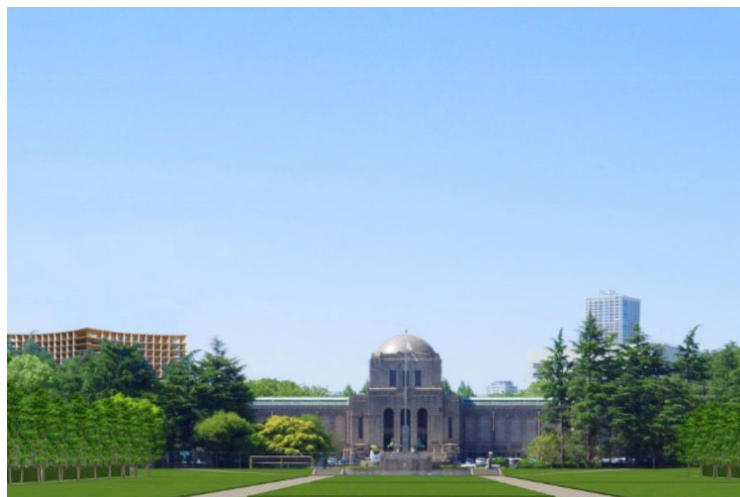


* These diagrams show the areas where anyone, regardless of facility user status, can enter without a reservation.

* Access to some locations of plazas and other areas may be restricted due to administrative control reasons.

* The diagrams may be revised as more detail is added to the project.

*6 Digital image of the Plaza in front of the Meiji Memorial Picture Gallery



(4) Statement concerning the environmental assessment

“the Environmental Assessment, which has been criticized as having numerous errors and unscientific methodologies”

(Excerpted from “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” issued by ICOMOS)

In February 2023, the developers received public notice of the approval of the project by the Tokyo Metropolitan Government as the “Jingu Gaien District Type-1 Urban Redevelopment Project,” following the proper completion of procedures. In March 2023, we began work on the dismantlement of Jingu No.2 Stadium.

Procedures for the Business Stage Environmental Impact Assessment of the Tokyo Metropolitan Government were completed in January 2023 following the proper completion of procedures in accordance with ordinances and other rules. In response to the issuance of the “Request for a response from the project developers regarding the ‘false report’ claim made by ICOMOS Japan National Committee regarding the Jingu Gaien District Urban Area Redevelopment Project (tentative name)” dated February 20, 2023 from ICOMOS Japan National Committee, the developers were requested to submit their responses at general meetings of the Environmental Impact Assessment Council (hereinafter, “council general meetings”). Accordingly, the developers submitted their responses at the council general meetings held in April and May 2023. The council general meeting has confirmed that there were no errors or falsehoods in any of the total of 58 items as claimed by ICOMOS Japan National Committee, and no change will be made to the assessments and forecasts in the assessment report.

(5) Statements concerning redevelopment procedures and dissemination of information

“without consultation with citizens and stakeholders”

“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.”

(Excerpted from “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” issued by ICOMOS)

The developers have been properly implementing the project in accordance with lawful procedures. From 2019 to 2021, we conducted a total of six presentations based on laws and regulations, etc., followed by three additional voluntary presentations in July 2023. Furthermore, in addition to these presentations, we have, among other things, disseminated information on the project website, taken questions and provided answers. We have established a system that allows for an interactive, two-way exchange of information – one that allows anyone, regardless of whether they are local residents or not, to obtain information and submit questions.

It is extremely regrettable that ICOMOS’ statements seem to suggest that the developers have provided no information and have disregarded the voices of residents and other stakeholders. In order to ensure that correct information about the project reaches as many people as possible, and that this information fosters their understanding and empathy for the project, we will continue to improve the information we provide through the project website and other channels.

(6) Statements concerning high-rise buildings

“the construction of skyscrapers in a world-renowned park”

“[Upon the introduction of the re-development district,] 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.”

(Excerpted from “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” issued by ICOMOS)

First, neighborhood creation in Jingu Gaien is an initiative to develop facilities such as plazas that many people may use on land owned by private business entities and incorporated administrative agency. It is not an endeavor to develop a park managed by the national government or local governments.

Construction of offices, mixed-use bldg. A, and mixed-used bldg. B is scheduled for the project. These structures will all be built outside of the Urban Planning Park District. The offices were formerly located outside of the Urban Planning Park’s boundaries and do not lie within a Scenic District. The planned construction area is located along an arterial road and is currently used primarily for offices and as a parking lot for the rugby stadium. It is a place that does not have any forests or woodlands.

Furthermore, although it is true that the repositioning of sports facilities will unavoidably cause the felling of some trees, the trees to be felled include many trees planted in rows along the site boundaries, and these trees do not constitute forests or woodlands. The project does not anticipate that the construction of high-rise buildings will cause the “destruction of forest.”

2. Significance of neighborhood creation

The developers have received numerous inquiries regarding the significance of neighborhood creation during previous presentations and through the project’s website. Therefore, we would like to revisit and explain the significance of neighborhood creation.

In the project, we will develop expansive plazas, enhance the site’s disaster readiness as a wide-area evacuation site, and renovate aging sports facilities. Concurrently, from the perspectives of preserving the views and scenery of the Meiji Memorial Picture Gallery, and creating spacious, open views around the Central Plaza, we intend to reduce the volume of the new baseball and rugby stadiums and structures around the rows of gingko trees, and promote the sophisticated utilization of areas planned for office, retail, hotel and other uses along Aoyama-dori Avenue and Stadium-dori Avenue. The project will be advanced as an integrated urban redevelopment project and is designed to maximize the area’s characteristics.

(1) The significance of Meiji Jingu Gaien and neighborhood creation

Meiji Jingu Gaien has long held a special place in the hearts of many people. While Naien has kept a solemn and dignified air, Gaien has constantly adapted to the times as a place where people may enjoy a variety of sports, culture and greenery while remaining true to Gaien’s essence as a facility “open to the public.” The forest of Naien is designed to regenerate itself naturally with no human intervention. The Gaien’s greenery, on the other hand, has grown alongside the public as people come and go, and the green spaces have been properly managed and maintained by people’s hands as times have changed, giving rise to the environment we have today. People’s hands will be required to update the greenery in the future as well. To ensure “GOJI”^{*7} of Meiji Jingu, which encompasses Naien and Gaien, it is critical to preserve what must be preserved while making the necessary updates. We seek to push this project forward eyeing the next 100 years so that Jingu Gaien will be a safe and secure place of rest and recreation for one and all, allowing those who continue to visit as they have done in the past, as well as those who compete in or watch sports events, to develop a closer affinity with sports and to enjoy an open Gaien even more.

The project's goals are to solve the current issues facing the Jingu Gaien district while ensuring "GOJI" of Meiji Jingu Naien and Gaien. The shrine and forest of Meiji Jingu Naien, as well as the greenery of Gaien, have been supported and maintained by the income generated by Gaien's various facilities as they have transformed over time. Jingu Stadium has played a particularly crucial role in this process. Renovating Jingu Stadium for the next 100 years through this redevelopment will enable "GOJI" of Meiji Jingu Naien and Gaien.

*7 "GOJI" means not only maintenance and management, but also carefully protecting and preserving Meiji Jingu Naien and Gaien for future generations.

In an effort to communicate more clearly the abovementioned significance of Meiji Jingu Gaien and neighborhood creation and the principle of "GOJI", we have today released a video titled "Chronicles of Jingu Gaien," which retraces the history of Meiji Jingu Gaien from its establishment to the present. We encourage you to watch this video in the hope that it will increase your understanding of the project.

Website with newly released video: <https://www.jingugaienmachidukuri.jp/history/>

(2) Significance of rebuilding in phases considering the continuity of sports events

In the project, while solving various issues, including the aging of Jingu Stadium and Prince Chichibu Memorial Rugby Stadium, we plan to rebuild sports facilities while relocating them*8 in order to minimize the amount of time that facilities are unavailable for use due to construction, considering the continuity of sports events. The alternative plan submitted by the ICOMOS Japan National Committee (hereinafter, "the ICOMOS Japan Plan")*9 proposes rebuilding the sports facilities in their current locations without relocating them, which means that sports events will have to be discontinued during the construction period. Furthermore, the ICOMOS Japan Plan states that there will be only two felled trees. However, it is unclear whether the ICOMOS Japan Plan was formulated based on construction plans such as erecting scaffolding and securing material delivery routes for the reconstruction work. We believe that the ICOMOS Japan Plan's likelihood of success is minimal.

*8 For example, in the case of Jingu Stadium, we will build the new stadium on the former site of the current rugby stadium, allowing sports events to continue in the current stadium even while the new stadium is being built.

*9 "Heritage Alert Jingu Gaien" issued by ICOMOS Japan National Committee, Press Release (p.3-4)

3. Future project implementation

The developers intend to implement the project appropriately as they continue to provide information to gain the understanding and empathy of all stakeholders. Concurrently, we will continue to report to and consult with council general meetings and other relevant bodies.

We will continue to welcome the many opinions and questions of community members with sincerity and provide information, including posting project presentation videos on the project website and offering detailed responses to questions received through the project website.

Please direct inquiries to:

Jingu Gaien District Urban Redevelopment Project Planning Office (Japanese language only)

Telephone: 03-6695-0539

Business hours: Monday to Friday (excluding national holidays) 9am to 6pm

Jingu Gaien District Urban Redevelopment Project website:

<https://www.jingugaienmachidukuri.jp/en/>