Sites of Japan's Meiji Industrial Revolution: Iron and Steel, Shipbuilding and Coal Mining

Partial Revision of the Hagi City Landscape Plan

(The control method for the buffer zone of Area 1 Hagi)

Summary

This is the Heritage Impact Assessment (HIA) Report created by Hagi City in regard to partial revision of the Hagi City Landscape Plan for the buffer zone of Area 1 Hagi, a component part of the World Heritage Sites of Japan's Meiji Industrial Revolution: Iron and Steel, Shipbuilding and Coal Mining.

Hagi City is considering partially revising the Hagi City Landscape Plan, which serves as the control method for the buffer zone of Area 1. The revisions are designed to create finer subdivisions within the buffer zone based on the particular nature and use of each so as to simultaneously protect the historical landscape while encouraging vibrancy by promoting commerce and industry. The specific content of the revisions would comprise clarification of a dedicated commercial area within a part of the buffer zone and partial revision of building height regulations solely within that area and along the bypass.

The relevant component parts included in the Area 1 Hagi would be Hagi Castle Town (1-4) and Shokasonjuku Academy (1-5). The attributes which convey the outstanding universal value (OUV) of these two parts are, in the case of Hagi Castle Town, the layout of the town and the castle ruins, and, in the case of Shokasonjuku Academy, small wooden buildings, so the revisions would not have any direct impact on them.

In addition, there is currently no concrete development schedule. The partial revisions to the Landscape Plan are intended to ensure the sustainability of regional economic development in Hagi City as well as the handing-on of elements (attributes) representing OUV to the coming generation.

Hagi City and component part manager will continue to engage in periodic observation through landscape monitoring to ascertain the impact on the surrounding views caused by the partial revision of height regulations. If specifically requested, the City is also prepared to compile and report annual landscape monitoring results. Hagi City remains committed to controlling the landscape in the buffer zone through appropriate operation of the Hagi City Landscape Plan.

1. Introduction

- (1) This HIA addresses Hagi Castle Town (1-4) and Shokasonjuku Academy (1-5) as component parts of the Sites of Japan's Meiji Industrial Revolution: Iron and Steel, Shipbuilding and Coal Mining inscribed as World Heritage in July 2015 (Figure 1).
- (2) In preparing the HIA, reference was made to items laid down in the World Heritage Conservation Management Plan (CMP) and the views of Japanese and international experts.
- (3) The main agent in preparation of the HIA was Hagi City.

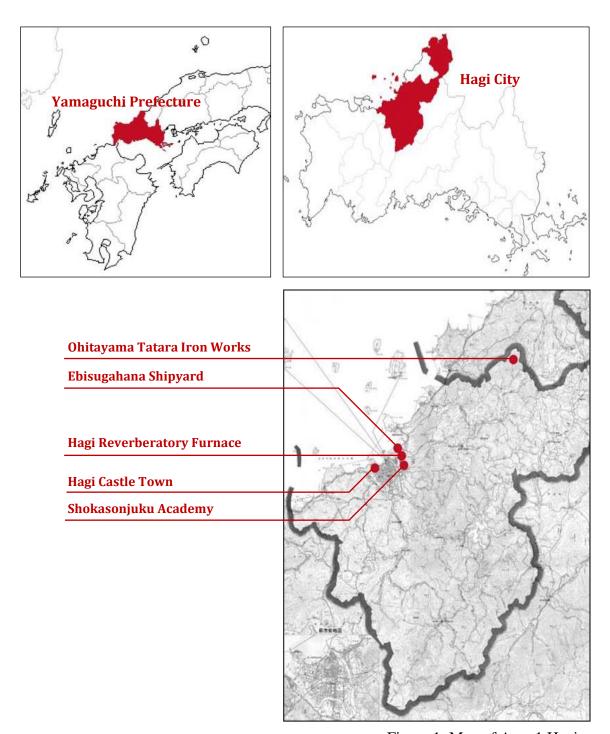


Figure 1: Map of Area 1 Hagi

2. Overview

- (1) Hagi City created the Hagi City Landscape Plan in 2007 pursuant to the Landscape Act in order to create a good landscape within the city area. It also formulated the Hagi City Landscape Ordinance, which lays out guidelines for the creation of the Landscape Plan as well as the necessary matters in terms of operation of the Landscape Act.
- (2) Hagi City is a regional city with a population of just under 50,000 people. While it is blessed with a rich natural environment and history, location almost entirely in a mountainous area has meant a weak industrial base, and the city has recently been experiencing a rapid population decline and inversion of the age pyramid. To address these problems, the city has been developing various programs with a focus on stimulating the regional economy. A series of considerations have also been conducted to enable the city to fulfill its responsibilities from both a world and a historical perspective to protect component parts and their buffer zones even as it addresses regional economic stimulation. Partial revision of the Hagi City Landscape Plan would be approached as an initiative seated within the context of this basic stance.

(3) Content of issue

(a) Building height regulations

The current regulations (noted in the Hagi Proto-industrial Heritage Conservation Management Plan) are indicated in Appendix 1, with the draft partial revisions attached as Appendix 2. Specifically, the maximum height of buildings would be changed from 16 meters to 20 meters in the commercial area established within the Hagi Castle Town buffer zone, and from 13 meters to 16 meters within 10 meters of either side of the bypass road (the Hijiwara-Shinkawa Line and Oya-Hijiwara Line).

(b) Commercial area

Commercial district in the City Plan and neighboring commercial districts (see Appendix 3: General Vision of Hagi City Planning)

Reasoning behind the selected heights in the Hagi City Landscape Plan

10m regulation

Because, pursuant to Article 55 of the Building Standards Act, the building height for the Category 1 Low-rise exclusive residential district as designated in the Hagi City Town Planning Decision is set at 10m

• 13m regulation

Based on the height of black pines as a distinctive element of the cityscape as well as the power poles installed throughout the urban area, and taking into account harmonization with existing low-rise buildings in the urban area

• 16m regulation

A study of existing medium-to-high-rise buildings in the city revealed that most buildings downtown are 16 meters or less in height, with this accordingly identified as the height that does not interrupt the view from downtown to the mountain skyline or to the landmark of Mt. Shizuki.

• 20m and 30m regulations

Set taking into account existing high-rise buildings of around 20 meters high (five-storied prefectural housing) and around 30 meters high (nine-storied apartment buildings) in the city

3. OUV of the World Heritage property

(1) The Outstanding Universal Value (OUV) of the Sites of Japan's Meiji Industrial Revolution: Iron and Steel, Shipbuilding and Coal Mining is as follows (excerpt from the Statement of Outstanding Universal Value in the World Heritage Committee Decision):

A series of industrial heritage sites, focused mainly on the Kyushu-Yamaguchi region of south-west of Japan, represent the first successful transfer of industrialization from the West to a non-Western nation. The rapid industrialization that Japan achieved from the middle of the 19th century to the early 20th century was founded on iron and steel, shipbuilding and coal mining, particularly to meet defence needs. The sites in the series reflect the three phases of this rapid industrialisation achieved over a short space of just over fifty years between 1850s and 1910.

The first phase in the pre-Meiji Bakumatsu isolation period, at the end of Shogun era in the 1850s and early 1860s, was a period of experimentation in iron making and shipbuilding. Prompted by the need to improve the defences of the nation and particularly its sea-going defences in response to foreign threats, industrialisation was developed by local clans through second hand knowledge, based mostly on Western textbooks, and copying Western examples, combined with traditional craft skills. Ultimately most were unsuccessful. Nevertheless this approach marked a substantial move from the isolationism of the Edo period, and in part prompted the Meiji Restoration.

The second phase from the 1860s accelerated by the new Meiji Era, involved the importation of Western technology and the expertise to operate it; while the third and final phase in the late Meiji period (between 1890 to 1910), was full-blown local industrialization achieved with newly-acquired Japanese expertise and through the active adaptation of Western technology to best suit Japanese needs and social traditions, on Japan's own terms. Western technology was adapted to local needs and local materials and organised by local engineers and supervisors.

- (2) Of the three phases reflecting the OUV of the Sites of Japan's Meiji Industrial Revolution: Iron and Steel, Shipbuilding and Coal Mining, five component parts in this Area belong to the first stage. Two of these are Hagi Castle Town and Shokasonjuku Academy. Hagi Castle Town was systematically built in the 17th century, and comprises three districts: Ruins of the Castle, the District of the Upper Class Samurai, and the District of the Merchant Class. The division of samurai and merchant residences into different districts reflects the traditional class system of feudal Japan. Shokasonjuku Academy was a private school that produced many key figures of the Meiji Restoration and the Meiji era.
- (3) The attribute conveying the OUV of the component part Hagi Castle Town (1-4) is the original castle town layout as systematically constructed back in feudal times, and includes a hierarchical space comprised of the castle ruins, moats, roads, and class-delineated residential districts. The attribute conveying the OUV of Shokasonjuku Academy (1-5) is the small wooden buildings in which the private school was housed. The conservation management of these is laid out as follows in the CMP:
- Protection of the component parts by the Law for the Protection of Cultural Properties

All Elements of Hagi Castle Town and Shokasonjuku Academy are conserved by designation as a Historic Site or selection as Important Preservation District for Groups of Historic Buildings under the Law for the Protection of Cultural Properties. In the site designated as a Historic Site, such acts that change the present condition and impact conservation are restricted. Also, the Law for the Protection

of Cultural Properties (the "Law") has a system in which the person who caused loss or damage or the like by changing the present condition, etc., shall be treated by the orders for return to original state and penalties, etc. It is necessary to obtain permission of the Commissioner of the Agency for Cultural Affairs under the Law and the Commissioner of the Agency may order the person who committed any act impacting conservation without permission for restoration to the original condition. In the Important Preservation District for Groups of Historic Buildings, an act that changes the present condition and impacts conservation are restricted by the Ordinance for conservation of the Preservation District for Groups of Historic Buildings in Hagi City under the Law. Not only for historic buildings which are considered to maintain the features of the historic buildings group of the district of the upper class samurai but also for general buildings in the Preservation District unified with those historic buildings, it is necessary to obtain the permission of the Mayor and the Board of Education of Hagi City under the Ordinance for any changes to the present condition, which change the appearances and if any change was made without permission, penalties may be imposed on the person under the Ordinance. Through such protective measures, the elements of Hagi Castle Town and Shokasonjuku Academy, which are the component parts contributing to the Outstanding Universal Value, are preserved in the condition at the time of World Heritage inscription.

• Protection of the property by the Road Act

Ruins of the Castle, District of the Upper Class Samurai, District of the Merchant Class which constitute Hagi Castle Town are connected with Onari-Michi where the Load of Hagi (Choshu) Clan accompanied with his subordinates passed through for Sankin-Kotai. Onari-Michi is now a Prefectural Road and a City Road. Since Yamaguchi Prefecture and Hagi City will continue to protect that element for sustaining its present state under the Road Act, the elements of Hagi Castle Town which is the component part contributing to the Outstanding Universal Value are preserved in the condition at the time of World Heritage inscription.

- (4) Regulations in relation to the buffer zone are laid down as follows in the CMP.
- Hagi Castle Town

The buffer zone of Hagi Castle Town is mostly comprised of an urban district, rivers, forests and sea area. The buffer zone is controlled by combination of the Hagi City Landscape Plan under the Landscape Act and Natural Parks Act. An overview of the control method under respective laws and the subjects, etc., to be conserved are as follows.

(a) Landscape control under the Landscape Act

Within the buffer zone, the portion other than the water surface shall be protected as the general landscape plan district and focused landscape planning district under Hagi City Landscape Planning (Figure 2). In the general landscape planning district, new construction of buildings, etc., and development, etc., exceeding a certain scale and in the focused landscape planning district, all new construction of buildings, etc., and development, etc., are restricted in accordance with the landscape formation standards, except for maintenance acts, etc. The height of buildings is also restricted. The Matsumoto River and the Hashimoto River on the both sides of the delta are positioned as important landscape rivers and the major rivers in the delta are positioned as quasi-important landscape rivers (Figure 3), where new construction, etc., of structures shall require permission for occupation and their shapes, designs and colors are restricted. All national roads, most Prefectural roads and major city roads in the buffer zone are positioned as important landscape roads, which shall require permission for occupation for new construction, etc., of structures and their shapes, designs and colors are restricted. Through these measures, the value of the component part shall not be impaired by construction of large-scaled buildings and development in the buffer zone, and an appropriate landscape will be protected.

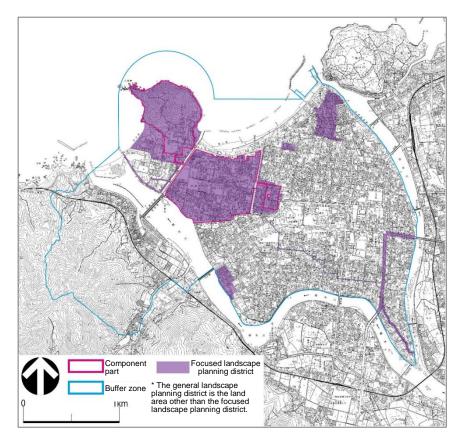


Figure 2: Focused and general landscape planning districts in the Hagi City Landscape Plan

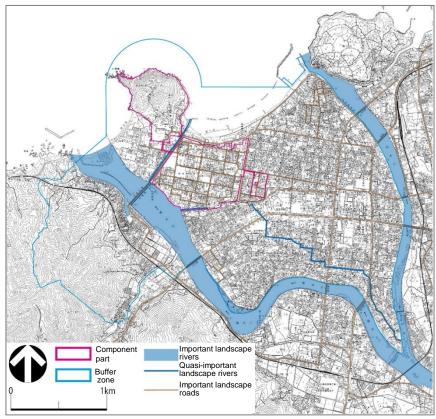


Figure 3: Important Iandscape rivers, quasi-important Iandscape rivers, and important

(b) Protection of the Natural Environment under the Natural Parks Act

Within the buffer zone, the sea surface and part of the forests on the western side are conserved as an ordinary area and a category 2 special area of the Kitanagato Coastal National Park under the Natural Parks Act. In the ordinary area, new construction, etc., of structures and changes in land shape, etc., exceeding certain standards are restricted and in the category 2 special area, new construction, etc., of structures and development of land and changes in roof colors, etc., are restricted. Through the above measures, a good natural environment is maintained without impairing the landscape at the time of construction of the component part with regard to the sea surface and forests in the buffer zone.

Shokasonjuku Academy

The buffer zone of Shokasonjuku Academy is within the premises of the Shoin Shrine. The buffer zone shall be controlled by Hagi City Landscape Plan under the Landscape Act. An overview of the control method under the respective laws is as follows.

(a) Conservation of good landscapes under the Landscape Act

All of the buffer zone shall be controlled as the focused landscape planning district under Hagi City Landscape Plan. In the focused landscape planning district, new construction, etc., of all buildings and changes in the characteristics of the land exceeding a certain space are restricted in accordance with the landscape formation standards. The height of buildings is also restricted. Through these measures, the value of the component part shall not be impaired by construction of large-scaled buildings and development in the buffer zone, and an appropriate landscape will be maintained.

4. Assessment of overall impact

- (1) Because there will no change to height regulations within the boundary of the Hagi Reverberatory Furnace and the Ebisugahana Shipyard component parts and their buffer zones, there will be no impact on elements (attributes) contributing to the OUV or on views.
 - In particular, despite revision of building height restrictions from 16 meters to 20 meters in part of the Hagi Reverberatory Furnace buffer zone, the partial revision will have no substantial impact on views, because the partial revision's area is limited to the bypass road (Hijiwara-Shinkawa line) and the area within 10 meters on both sides of the road where building height is already set at 20 meters in its surrounding area.
- (2) In the case of the Hagi Castle Town buffer zone, the area where the height regulations will be changed is a substantial distance from the component part. The view at the nearest point from the component part to that area (shown in Appendix 4-7) suggests that there will be no impact on elements (attributes) contributing to the OUV. The views from the observation points designated for monitoring the Hagi Castle Town landscape as well as views of the surrounding mountain skyline (shown in Appendices 4-5 and 4-6) should therefore not be substantially impacted by the change to a 20-meter building height.
- (3) Height regulations will not be changed for the Shokasonjuku Academy buffer zone, but will change for the western area outside the buffer zone. An additional study was therefore undertaken on the view to the west (see Appendix 4-8), which revealed that because of the thick trees on the western side of Shokasonjuku Academy, there will be no impact on the view.

(4) The partial revision of height restrictions is primarily geared to the establishment and clarification of a commercial area and revitalization of the area along the bypass road based on the decision that regional economic revitalization is needed to halt rapid population decline and age pyramid inversion. The scope of the commercial area will be restricted to the commercial district and neighboring commercial districts in the City Plan. The revisions are designed to create finer subdivisions within the buffer zone based on the particular nature and use of each so as to simultaneously protect the historical landscape while encouraging vibrancy by promoting commerce and industry, thereby addressing urgent challenges facing Hagi City while also minimizing the impact on the landscape. Going ahead, buffer zones will continue to be designated as focused landscape planning districts or general landscape planning districts, with restrictions placed in line with the landscape formation standards in the Hagi Landscape Plan on all new building construction and development activity in the focused landscape planning district, with the exception of maintenance activity, and on all new construction of buildings and development activity over a certain scale in general landscape planning districts. Aside from restrictions in the landscape formation standards, regulations will also continue to be placed on building coverage and the floor area ratio for City Plan use districts. Land in the commercial area is currently so subdivided that the amount of land held by each landowner is too small in almost all cases to erect a large building, so it is unlikely that this will result in irredeemable change to the current state such as a string of buildings of over 16 meters being built.

5. Management process

- (1) As noted above, Hagi City, landowners of the component part and the buffer zone, and related institutions have engaged in detailed and scrupulous consultations and considerations on the impact of partial revisions to building height restrictions on component parts and the landscape.
- (2) Under the governance system (the General Principles and Strategic Framework for Conservation and Management) for the Sites of Japan's Meiji Industrial Revolution: Iron and Steel, Shipbuilding and Coal Mining, Local Conservation Councils are set up for each area. For this area too, the Hagi Conservation Council has been set up to exchange information and views and make decisions on the conservation management of component parts.

This HIA was discussed at the Hagi Conservation Council meeting held on May 14, 2018, and compiled after subsequent interviews with Council members, etc..

The Hagi Conservation Council assesses the partial revisions to building height restrictions as follows:

The partial revisions to the Landscape Plan have arisen in the process of addressing challenges facing Hagi City, and are not directly aimed at relaxing regulations in the buffer zone. They have therefore been compiled to address said challenges while minimizing the negative impact on the landscape in the buffer zone. Ensuring the sustainability of the area in which component parts are located is essential in maintaining good conservation in the component parts.

Hagi City and component part managers will need to continue monitoring the landscape and views in the buffer zones for Hagi Castle Town and Shokasonjuku Academy. The City should also continue with landscape control through appropriate operation of the Hagi City Landscape Plan.

(3) Along with the above procedures, the city is promoting openness such as by holding discussion meetings by the Hagi Landscape Council and concerned City Council members as well as public hearings for residents.

As a result, while the initial proposal on the scope of the height restriction revision called for application to the entire delta and its surrounding areas in the buffer zone, efforts to narrow this scope were made in the study stage, such as limiting it to the commercial districts and areas along the bypass roads.

This result shows that the approach to conservation and management in the Strategic Framework, of holding repeated open and frank discussions among the people involved, proved to be sufficiently effective.

- (4) Hagi City will continue to share information and consult fully with component part managers in relation to buffer zone conservation. Where necessary, advice can also be sought from the Industrial Heritage Expert Committee, which operates under government (Cabinet Secretariat) auspices (Figure 4).
- (5) The government departments concerned asked for the advice of overseas experts and others regarding this matter. Based on the advice received, photo montages from various angles were created and used in assessing the impact. The results of the impact assessments, including those of photo montages from additional angles, are given in Appendices 4-1 to 4-8.
- (6) Based on the Conservation, Restoration, Presentation and Public Utilization Plan that Hagi city established in 2017, the city prepares monitoring chart for related information that has been comprehensively and systematically collected, and regularly keeps track of the state of the component parts and the buffer zones. Each fiscal year, the city summarizes the monitoring results in an annual report, and after obtaining confirmation and approval by the Hagi Conservation

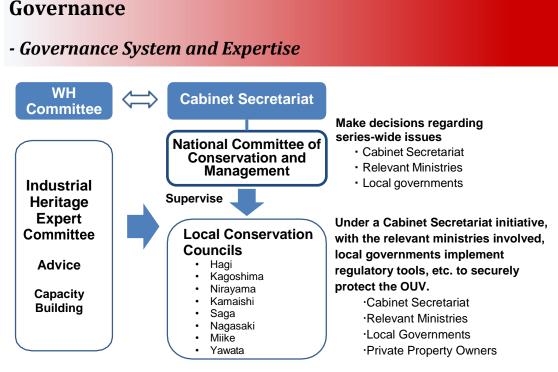


Figure 4: Governance system under the General Principles and Strategic Framework for Conservation and Management

Council, reports to the "Sites of Japan's Meiji Industrial Revolution" National Committee of Conservation and Management.

6. Conclusion

- (1) The partial revisions to the Landscape Plan will not have an immediate negative impact on the OUV, integrity or authenticity of the Sites of Japan's Meiji Industrial Revolution: Iron and Steel, Shipbuilding and Coal Mining.
- (2) A mechanism for regular and ongoing monitoring by Hagi City and component part managers is in place to investigate whether the views from component parts are being affected, and there is also a system for landscape control and prevention of unorganized development.
- (3) While the city is to make an announcement to the public about the revision after submitting this report, there are no plans to construct new buildings of more than 16 meters in height at this stage. Should such plans emerge, the impact on the landscape, etc. will be ascertained beforehand. If even the slightest potential impact is identified, cooperation will be sought through a prior consultation stage between the city and the developer. In order to mitigate any impact to the greatest extent possible, this consultation stage will precede the developer's official submission of notification to the city for construction.
- (4) Periodic observation will be continued through landscape monitoring to ascertain the impact on the surrounding views caused by the partial revision of height regulations. If specifically requested, the City is also prepared to compile and report annual landscape monitoring results. Hagi City remains committed to controlling the landscape in the buffer zone through appropriate operation of the Hagi City Landscape Plan.
- (5) As explained above, the risk to World Heritage through these partial revisions has been successfully minimized.

REFERENCE

- 1. Process to date
- June 2017

Revitalization of the regional economy is announced as a municipal administrative policy, requiring partial revision of the Hagi City Landscape Plan to establish a commercial area, etc.

- The municipal section in charge of the landscape subsequently launches considerations on revision of the Hagi City Landscape Plan.
- February 2018

Hagi City Landscape Council meeting (outline of the partial revisions to the Hagi City Landscape Plan)

March 2018

Views of members of the Committee for Restoration of Hagi Castle Town and Other Historic Sites sought (partial revision of buffer zone regulations)

March 2018

Explained the landscape plan partial revisions to the Hagi City Council (1st time)

May 2018

Hagi Conservation Council meeting (partial revision of buffer zone regulations)

• July 2018

Hagi City Landscape Council meeting (explanation of partial revisions to the Landscape Plan)

• July–September 2018

Briefings for and interviews with local residents of partial revision of the Landscape Plan, briefings for and interviews with related groups

September 2018

Explained the landscape plan partial revisions to the Hagi City Council (2nd time)

• October–November 2018

Public inspection and public hearing implemented on partial revision of the Hagi City Landscape Plan, interviews held with the Hagi City Planning Council

November 2018

Compilation of the final draft partial revision of the Landscape Plan; the Hagi City Landscape Council meeting (explanation of the final draft partial revision to the Landscape Plan)

• December 2018

Explanation of the final draft partial revision of the Landscape Plan to the City Council (3rd time)

December 2018

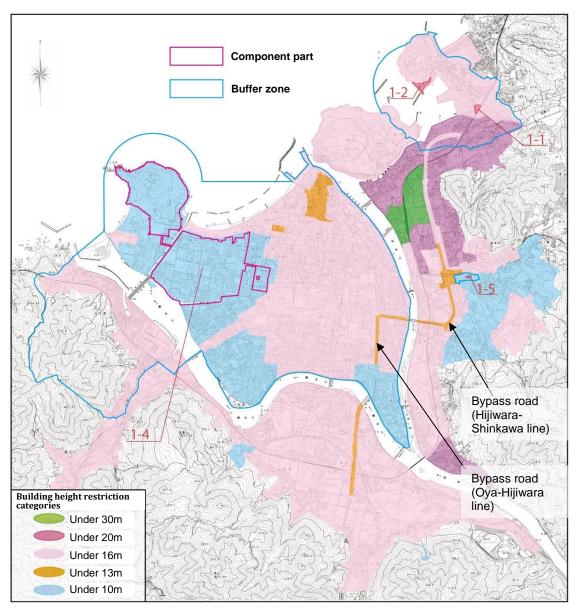
Hearing opinion from the Industrial Heritage Expert Committee.

• January 31, 2019

Official announcement of partial revisions to the Landscape Plan will be made by the Mayor.

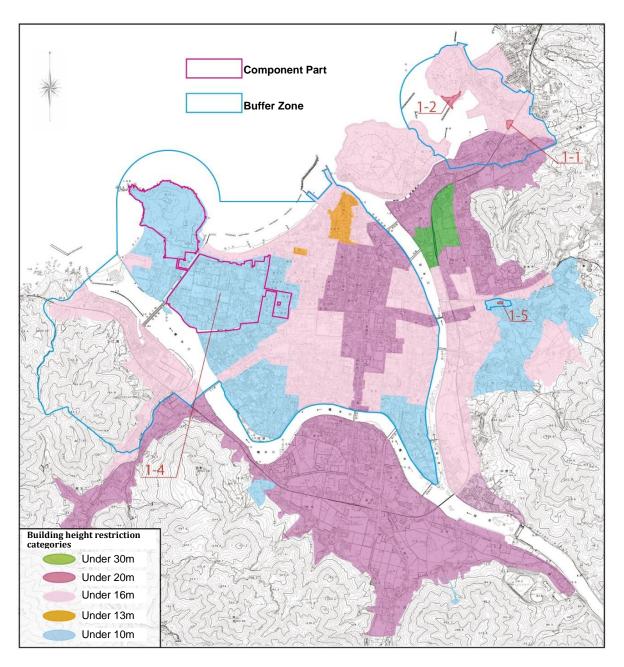
Appendix 1

Building Height Regulations in the Hagi City Landscape Plan (Current)



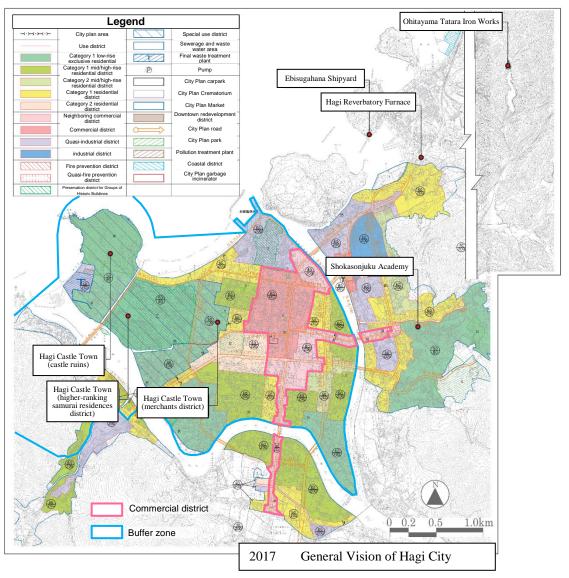
- 1-1 Hagi Reverbatory Furnace
- 1-2 Ebisugahana Shipyard
- 1-4 Hagi Castle Town
- 1-5 Shokasonjuku Academy
- 1-3 Ohitayama Tatara Iron Works is located outside this map.

Appendix 2 Building Height Regulations in the Hagi City Landscape Plan (Draft Partial Revision)



- 1-1 Hagi Reverbatory Furnace 1-2 Ebisugahana Shipyard
- 1-4 Hagi Castle Town
- 1-5 Shokasonjuku Academy
- 1-3 Ohitayama Tatara Iron Works is located outside this map.

General Vision of Hagi City Planning (Use districts)

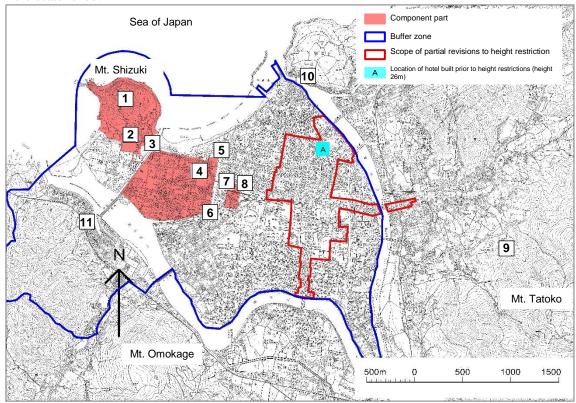


Impact on Buffer Zones

(a) Monitoring of component parts and their buffer zones (establishment of observation points)

A total of 11 observation points have been established in Hagi Castle Town: eight within the component parts (No. 1-8) and three outside (No. 9-11). Landmarks comprise Mt. Shizuki (No. 1, 143 m) inside the component parts, Mt. Tatoko (372.8 m) east of the component parts, and Mt. Omokage (253.1 m) south of the component parts.

* "A" on the map below indicates the location of a hotel (26 m high) built before height regulations were established.



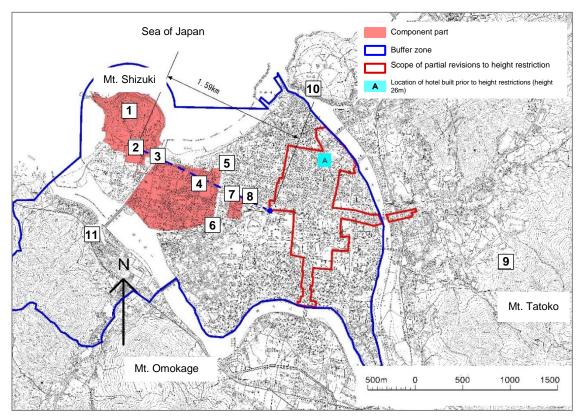
(b) Changes to views from the observation points within and outside the component parts caused by partial revisions to height restrictions

Simulation of views from observation points within and outside the component parts in the direction of areas subject to the partial revisions to height restrictions confirms that there will be no impact on the views.

These simulations are indicated in the pictures below. Yellow lines indicate the current 16-meter regulation, and red lines indicate the height after revision to 20 meters.



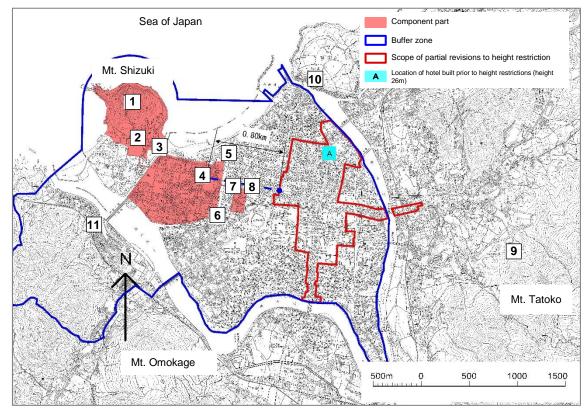
The view southeast from Observation Point No. 2 (Hagi Castle Lookout Tower), indicating the envisaged height if there was a building 1.59 kilometers from the observation point. Because both the 16 m height (the yellow line) and 20 m height (the red line) are virtually obscured by the trees in the foreground, there will be no negative impact on the view.



Appendix 4-3

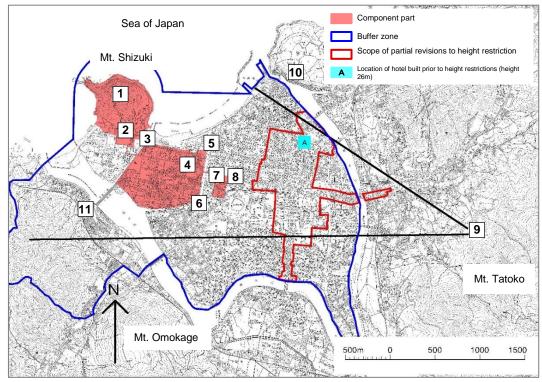


View east from Observation Point No. 4 (Gocho-Yokocho intersection) showing the envisaged height of a building constructed around 800 meters from the observation point. Both the 16 m height (the yellow line) and 20 m height (the red line) show no impact on the view.



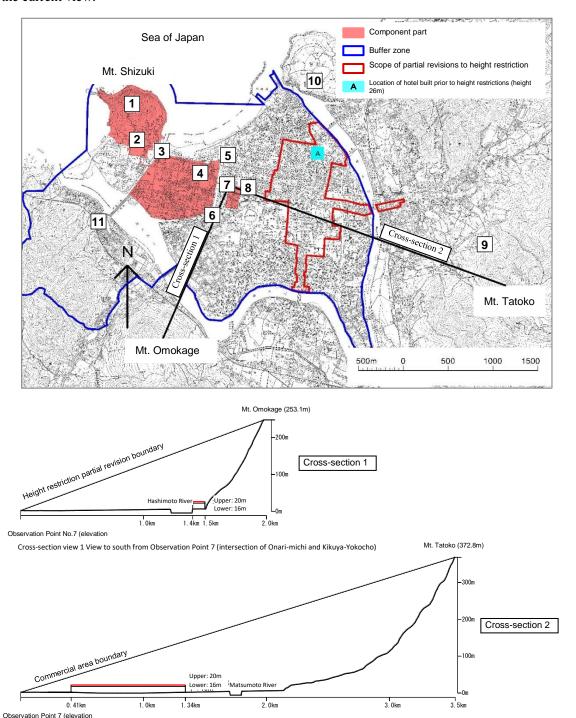


View towards Hagi Castle Town from Observation Point No. 9 (Tōgei no Mura Park Viewpoint). "A" on the map above indicates the location of a hotel (26 m high) built before height regulations were established. The lines indicate the height as seen from Observation Point No. 9 if there were buildings in the commercial area. Both the 16 m height (the yellow line) and 20 m height (the red line) show almost no impact on the view.



(c) Changes to the view of the surrounding mountain skylines from observation points inside the component parts due to partial revisions to height regulations

Observation Point No. 7 (intersection of Onari-michi and Kikuya-yokocho) was taken as the view point within the component part. The cross-section view of landmarks Mt. Omokage and Mt. Tatoko from Observation Point No. 7 is shown below. The area subject to height restriction changes is outlined in red. This area is lower than the lines between the observation point and the two mountain tops. There are also in fact already buildings near the observation point that interrupt the view of the mountain tops. The revision to building height regulations will therefore cause almost no change to the current view.

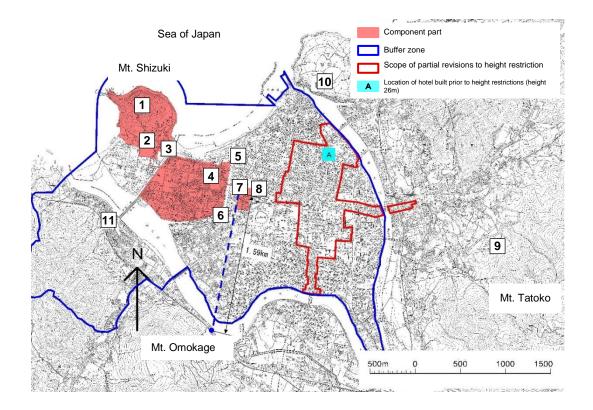


Cross-section view 2 View to east from Observation Point 7 (intersection of Onari-michi and Kikuya-Yokocho)



View south (towards Mt. Omokage) from Observation Point No. 7 (intersection of Onari-michi and Kikuya-yokocho)

This shows the envisaged height if there were buildings on the border of the area where the height regulation will be changed from 16 to 20 meters (approx. 1.59 km from the observation point). Both the 16 m height (the yellow line) and 20 m height (the red line) show almost no impact on the view of the surrounding mountain skyline.

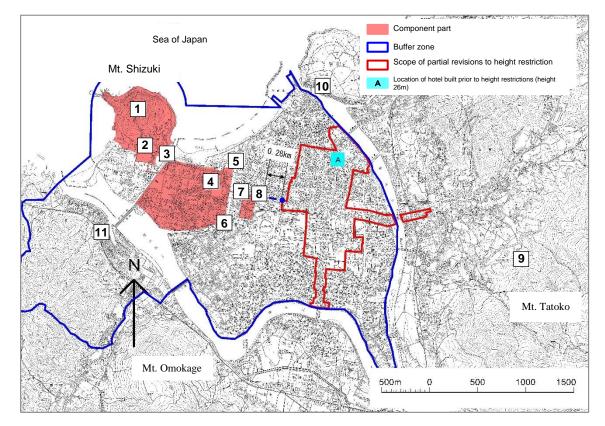


Appendix 4-7



View east (towards Mt. Tatoko) from Observation Point No. 8 (intersection of Onari-michi and Edoya-yokocho)

This shows the envisaged height if there were buildings on the border of the commercial area (280 m from the observation point). Both the 16 m height (the yellow line) and 20 m height (the red line) have almost no impact on the view of the surrounding mountain skyline.



Appendix 4-8

An additional study was also made on the impact of partial revision of height regulations on the western side outside the buffer zone for Shokasonjuku Academy.



View west from Observation Point No. 12 (on the western side of Shokasonjuku Academy) This shows the envisaged height if there were buildings on the border of the commercial area (230 m from the observation point). Both the 16 m height (the yellow line) and 20 m height (the red line) are obscured by the trees in the foreground, with no impact on the view from Shokasonjuku Academy.

