



## Planned Expansion of National Park in Old City Basin to be discussed by Local Planning Committee in early March

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*The following alert is jointly issued by Bimkom, Emek Shaveh, Ir Amim and Peace Now*

As recently [published by the Times of Israel](#), on March 2, 2022, the Jerusalem Municipality's Local Committee for Planning and Construction is expected to discuss [plan no. 674788](#) to expand the National Park around the Old City walls by 275 dunams (68 acres). The plan proposes the National Park land designation for areas on the slopes of the Mount of Olives, the Ben Hinnom Valley (Wadi Rababe) and beyond to Abu-Thor, the Kidron Valley and Wadi al-Joz, which includes privately-owned Palestinian land (including one existing home in al-Hizbe), and Church-owned land, encompassing some of the most important sites in Christianity. As a result of the proposed expansion, Palestinian neighborhoods will be cut off from the Old City and residential development for these communities will be further limited. *See maps below.*

Following the annexation of East Jerusalem in 1967, the State of Israel designated and later declared some 1,085 dunams of land surrounding the Old City - including Mount Zion, the Wadi Hilweh neighborhood of Silwan and the al Hizbe neighborhood of Wadi al-Joz as the "Jerusalem Walls National Park." This National Park has long served as a severe impediment to Palestinian planning and building. Instead of decreasing its size, the Israel Nature and Parks Authority (INPA) is currently proposing to expand the size of the National Park by approximately 25%. The procedure for approving the planned expansion includes approval by the District Planning Committee, followed by an official declaration by the Minister of Interior.

In a joint statement by Israeli peace and human rights organizations, Bimkom, Emek Shaveh, Ir Amim and Peace Now, who are working together to cancel the plan, they wrote:

"There is a direct link between what is happening in Sheikh Jarrah and the expansion plan. These are various mechanisms used by Israel in East Jerusalem to entrench its sovereignty, to marginalize non-Jewish presence and to prevent much needed development of Palestinian neighborhoods thereby increasing the pressure to push them out of the Old City basin. This plan is part of a process of transforming the symbolic and political importance of the Historic Basin, by increasing the Jewish religious and national significance of this area while increasing the pressure on the Palestinian residents. We object to the cynical misuse of heritage and environment protection as a tool by Israeli authorities for justifying settlement expansion, for re-

shaping the historical narrative and for determining ownership over the historical basin.”

Likewise in response to the plan, on February 18, the heads of Jerusalem churches sent [a scathing letter](#) to the Minister of Environmental Protection, Tamar Zandberg, demanding the plan's cancellation.

**The plan can and must be halted.** The Israeli government must remove it from the table and prevent its promotion to avoid a serious crisis with the Christian world as well as the distancing of a future compromise in Jerusalem. In parallel, the government should focus on finding solutions for equitable development of the Palestinian neighborhoods in the Old City Basin in particular and in East Jerusalem at large. Such development can be done in a way that will not harm the landscape and the visibility of the Old City Walls.

## **Destructive Ramifications of the Planned National Park Expansion:**

### **1. Management of INPA and its Limitations**

Land which is declared as a National Park comes under the responsibility of the Israel Nature and Parks Authority (INPA). This means that the management of the designated area is handed over from the Jerusalem Municipality to the INPA, which as a national authority, is not directly responsible for the residents of the city and can initiate projects and activities as it sees fit. Moreover, any work in an area designated as a National Park requires the approval of the INPA in addition to all of the usual approvals of other authorities, such as the municipality. For example, in a National Park, a permit from the INPA is required not only for construction, but also for planting trees or cultivating land, and even for photographing within the park area.

Read more about Israel's misuse of National Parks in East Jerusalem in [Bimkom's 2012 report](#), [Emek Shaveh's 2013 update](#) and [2014 Report](#).

### **2. Settlement Activity**

The planned extension of the national park will likely bolster the [emerging settlement ring around the Old City](#), consisting of residential settler compounds and settler-operated tourist sites which serve as [a guise for Jewish settlement](#) expansion. Many of the areas designated in the plan either contain existing touristic settlement initiatives and/or border these sites or residential settler enclaves. Longstanding collaboration between the [INPA and settler organizations](#), such as Elad (aka the City of David foundation), has led to the transfer of land into settler hands who convert Palestinian spaces into Israeli tourist and recreational sites as a front to strengthen settler strongholds and further entrench Israeli sovereignty in the Old City Basin.

In the late 1990s, the INPA subcontracted operation of “the City of David” site in Wadi Hilweh, Silwan to the Elad settler organization. Since then, they have superimposed an exclusively Jewish nationalist narrative over the space and have utilized it as a

platform to expand Israeli settlement in the area. In the Emek Tzurim park (which the national park extension is meant to connect to), the Elad organization likewise manages an [archeological activity site](#) under the auspices of the INPA. Most recently, the organization began operating "[ancient agricultural](#)" [demonstrations](#) in Wadi Rababe ([Ben Hinnom Valley](#)) on [national park land](#), some of it privately owned, which the INPA handed to Elad [to develop and operate](#) without the issuance of a tender.

On the issue of granting the powers and scope of activity in the sensitive area of the Old City Basin to an ideological private organization, [the State Comptroller's report from 2016](#) states:

"The Old City basin in Jerusalem has sites of national, religious, historical, spiritual, archeological and cultural importance...the dereliction of duty of [the INPA and Israeli Antiquity Authority] led to a situation in which, in practice, the [Elad settler] organization became a major factor in the area of management and operation of tourist sites in the Old City basin in Jerusalem, without substantial oversight by the state authorities in charge of the area and its sites...the transfer of [rights and authority] to a private body without due oversight and in contravention of proper administrative standards is tantamount to a total disavowal by the State of its authorities."

As demonstrated in the past, the INPA will likely use the National Park's expansion for the establishment of more touristic-settlement projects as a means to strengthen the Israeli presence in these areas, while further eroding the Palestinian character of the space.

### **3. No Real Justification for Expansion of the National Park**

The plan's documents state that the expansion aims to "**ensure the unique character of the area, by preserving the site's historical, religious and national, landscapes and architectural values.**" The documents likewise emphasize the importance of preserving the landscape around the Old City and protecting the visibility of the Old City Walls.

It is important to underscore that during the 54 years that the State of Israel has controlled this area, the landscape values that the plan refers to have hardly been harmed. There was no massive construction that impaired the visibility of the Old City Walls. The protection of the area is carried out through other means, primarily by city-plan number AM/9 that was approved in 1977 and designed to protect the unique character of the Old City Basin. This plan prevents construction and development that would harm landscape values, and the Jerusalem Municipality enforces the law accordingly. Therefore, the declaration of these new areas as a National Park does not add a significant layer of protection for these landscape values.

It should also be noted that in 1968, when the plan for the declaration of the National Park was first prepared, the planners originally wanted to include the areas that are now being designated for the expansion. The INPA mentions this as a justification for the action and as simply completion of a move that allegedly was decided fifty years

ago. However, the truth is this measure constitutes a far-reaching step. Israel has avoided it for 50 years and carrying this out now is a step in the wrong direction. In fact, the only construction plans which threaten the aim of “preserving the site's historical, religious and national, landscapes and architectural values” are those promoted by the Elad organization for the construction of the Kedem Compound (16,000 sqm. and over seven floors) and the cable car (which was halted temporarily by the Supreme Court and now awaiting a final ruling).

#### **4. Harm to Palestinian Residents**

Beyond deepening the erosion of the Palestinian presence in the Old City Basin, the plan also directly blocks the possibility of Palestinian development and increases pressure on the residents living in the area. The expansion of the National Park will flank Palestinian built-up areas, including Abu Tur (A-Thouri) and Wadi Al-Joz and create a buffer between the neighborhoods of a-Suwana, Wadi Al-Joz, A-Tur. Such a plan will ultimately deplete the remaining land reserves in each of the respective neighborhoods, further constricting the development of these Palestinian communities and exacerbating their longstanding planning stranglehold. The Palestinian neighborhoods encircling the Old City have long suffered from under-development and neglect stemming from discriminatory planning policies, including the designation of large areas as “green,” which precludes residential development. Thus, the absence of proper urban planning coupled with severe punitive measures against unauthorized building serve as an acute lever of ongoing Palestinian displacement from areas along the perimeter of the Old City. Indeed, according to Ir Amim data, 43 Palestinian homes in these neighborhoods alone were demolished in 2021 due to the lack of proper zoning plans.

Despite this, the plan documents reveal that no needs-assessment was conducted for approximately 100,000 residents in the Old City Basin before it was determined that these land reserves would become a National Park.

#### **5. Damage to Jerusalem’s Christian Religious Site**

A portion of the area designated for the national park expansion is owned by the Franciscan, Greek and Armenian Orthodox Churches. Nearly 20 Christian sites, some of the most important to Christianity, are either in the area designated for the National Park or are surrounded by it or adjacent to it on the slopes of the Mount of Olives. For example, the Churches of Gethsemane, Mary Magdalene, and Dominus Flevit are sandwiched by the National Park from the north and south and compressed into a narrow strip of Christian presence. The Catholic Cemetery in the Kidron Valley together with the Papal Garden is included within the bounds of the National Park’s expansion. When the planners wanted to include the Jewish Cemetery nearby, the Jewish religious authorities managing the cemetery opposed it and prevented its inclusion.

In fact, the planned National Park will undermine the complex of the Mount of Olives slopes as a Christian site. The Mount of Olives is one of the three most important sites

to Christianity in the city, home to a high concentration of holy sites. The plan will result in a narrow Christian enclave encircled by areas of Israeli control and dominance. This plan, initiated without any dialogue with Christian stakeholders in Jerusalem, indicates a disregard and contempt for the churches and Christians worldwide.

## **6. Part of Settlement Efforts to Encircle the Old City**

Since the 1980s, the Israeli government has been working closely with settler organizations to expand the Israeli presence in and around the Old City while continually acting to curb the Palestinian demographic in the area. To date, they have managed to establish Israeli enclaves with approximately 3,000 settlers within Palestinian neighborhoods in the Old City and its surroundings, including Silwan, Ras Al-Amud, A-Tor, Sheikh Jarrah and others. Along with residential settlement, the Israeli government is investing hundreds of millions of shekels in tourism projects designed to bolster the Israeli presence in the area and transform it from a Palestinian environment into a Jewish space with small Palestinian Muslim and Christian enclaves.

These measures are in service to Israel's longstanding goal of solidifying control of the Old City Basin and creating an Israeli continuum between East and West Jerusalem. This ring of control extends from Sheikh Jarrah in the north to Silwan in the south. In Sheikh Jarrah and Silwan, hundreds of Palestinians face displacement from their homes in favor of Jewish settlement while in Wadi Al-Joz, the Jerusalem municipality intends to demolish Palestinian businesses to establish "Silicon Wadi." The existing National Park in A-Suwana and the settlements in this neighborhood along with those in A-Tur, Mt. of Olives, Ras Al-Amoud, Batan Al-Hawa, Al-Bustan, Wadi Hilweh, Wadi Rababa, and the cable car project are all designed to create key links in the deepening band of Israeli settlement around the Old City Basin.

The expansion of the national park is therefore an attempt to produce a "green" ring embedded with residential settlement and touristic-settlement projects in and around the Old City as a means to consolidate Israeli hegemony over this area and foil any remaining prospect of an agreed resolution on Jerusalem.

## **Conclusion**

- This plan is part of a process of transforming the symbolic, religious, and political import of the Old City Basin by augmenting the Jewish religious and national significance of this area while eroding the multi-religious and multi-cultural nature of the space and blurring the Palestinian presence within its bounds.
- This plan is not justified from a planning perspective and is of no value to the protection of historical assets. Its sole purpose (alongside other discriminatory laws and policies) is to serve an ideological and religious right-wing agenda for the Old City Basin. It is a cynical misuse of heritage and environmental protection discourse as a tool for justifying settlement expansion, restricting Palestinian development, and further entrenching Israeli sovereignty.

- The current plan should be canceled and in its place the Israeli government should promote a plan to reduce the size of the National Park Surrounding the Old City Walls in a way that does not include Wadi Hilweh and al-Hizbe in the National Park's boundaries, thereby allowing them to develop into neighborhoods with proper residential development. Such development can be done in a way that will not harm the landscape and the visibility of the Old City Walls. This should be done while





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