

H.E. Mr Priit Pallum
Ambassador Extraordinary and
Plenipotentiary
Permanent Delegate of the Republic of
Estonia to UNESCO
Ambassade de la République d'Estonie
17 rue de la Baume
75008 Paris

16 May 2025

Culture Sector
World Heritage Centre

Ref: CLT/WHC/ENA/25/15234

Dear Ambassador,

I acknowledge, with thanks, receipt of the letter from the Tallinn City Planning Department dated 11 April 2025 transmitting the draft Comprehensive Management Plan and the Tallinn Heritage Conservation Area Protection Policy Bill for the World Heritage property '**Historic Centre (Old Town) of Tallinn**'. I am pleased to transmit the resulting ICOMOS Technical Review herewith.

In its Technical Review, ICOMOS commends the draft Management Plan as a well-structured and accessible document that reflects extensive public engagement and thoughtfully integrates the Old Town into the city's broader development strategy. It further notes that the document, together with the Tallinn Heritage Conservation Area Protection Policy Bill, provides a sound foundation for sustaining the Outstanding Universal Value (OUV) of the property. ICOMOS shares the risk identified in the Management Plan that the Old Town become a mono-functional tourist area and acknowledges the need for measures aimed at revitalising the resident population and community life. While these measures are promising, ICOMOS notes that key actions, such as data collection and target setting, are still in preliminary stages and therefore recommends that a revised plan be submitted for further review once more concrete implementation strategies have been developed.

I would be grateful if you could share the attached ICOMOS Technical Review (see **Annex I**) with your competent authorities for their consideration and keep the World Heritage Centre informed of any actions taken in response to its recommendations. As is customary, the World Heritage Centre and ICOMOS remain at their disposal for any further clarification or assistance that may be required.

In addition, I would like to inform you that the World Heritage Centre has become aware, via media reports, of the extension of the Tallinn Secondary School of Science within the property boundaries, which appears to already be under construction.

In accordance with paragraph 174 of the Operational Guidelines for the Implementation of the World Heritage Convention, I am sharing this information with you (see **Annex II**) to enable the World Heritage Centre to verify its contents with your competent authorities, to whom I would like to invite to provide any comments deemed relevant together with detailed documentation on the project.

.../...

Please rest assured that both the World Heritage Centre and ICOMOS are fully committed to protecting this World Heritage property through constructive dialogue and ongoing cooperation with all relevant stakeholders.

I thank you for your continuous collaboration and support in the implementation of the World Heritage Convention and remain,

Yours sincerely,



Lazare Eloundou Assomo
Director

Enc.: Annex I – ICOMOS Technical Review
Annex II – Media reports

cc: Estonian National Commission for UNESCO
National Focal Points for the implementation of the Convention
ICOMOS International

Annex I

ICOMOS Technical Review on the draft Comprehensive Management Plan of the World Heritage property 'Historic Centre (Old Town) of Tallinn'.

ICOMOS Technical Review

Property	Historic Centre (Old Town) of Tallinn
State Party	Estonia
Property ID	822bis
Date of inscription	1997
Criteria	(ii)(iv)
Subject	Comprehensive Management Plan 2035

Background

On 11 April 2025, the State Party submitted to the World Heritage Centre, for review by the Advisory Bodies, a new draft *Historic Centre (Old Town) of Tallinn Comprehensive Management Plan 2035*, which will replace the *Comprehensive Management Plan 2014-2021*. The *Tallinn Heritage Conservation Area Protection Policy Bill*, which on adoption will replace the current *Statutes of the Heritage Conservation Area of Tallinn Old Town*, has also been submitted for information. These two documents, once adopted, will form the legal basis for the management of the World Heritage property.

Analysis

The draft Comprehensive Management Plan 2035 is the outcome of extensive public engagement and review. While being comprehensive in its scope, it is a commendably succinct, accessible document that makes extensive use of live links to external sources and to related development documents. Active monitoring of the document is thus essential to ensure that the external links are kept up-to-date.

Policies for the ongoing conservation and study of the Old Town of Tallinn, its morphology and setting, its historic structures and its below-ground archaeology are set out in principle in the draft Management Plan, with detailed regulation via the complementary Protection Policy Bill. The debate about the extension of the Estonia Opera House has led to a more nuanced, expanded exposition of the attributes of Outstanding Universal Value, which is helpfully reflected in the draft Management Plan (p. 7). The integration of the Old Town into the city's *Development Strategy 2035* is comprehensively addressed in Section 2, detailing connections between the Plan and the range of development documents affecting the site.

On page 15 of the draft Management Plan, it is stated that: "The population of the Old Town is severely marginalised [...] The Old Town is at risk of becoming a mono-functional tourist area, which is not good for the functioning of Tallinn's city centre". This is a major issue affecting many historic towns and cities, which run the risk of drifting from fully functioning urban centres visited by tourists to places largely devoted to touristic entertainment.

The draft Management Plan emphasizes that supporting and increasing the resident population and community of the Old Town is necessary to sustain its cultural heritage. The document outlines measures aimed both at enhancing the appeal of settled living in the Old Town (p. 20) - by ensuring that essential services including schools, shops, healthcare facilities, and public transport are accessible within walking distance of homes – and at mitigating the negative impacts of tourism, particularly nighttime noise and the rise in short-term apartment rentals. The first step, planned for 2025, will be to collect baseline data, such as the actual number of residents living in the area, as opposed to those merely registered. Based on this data, specific targets will be established and strategies developed to achieve them.

Conclusions and recommendations

ICOMOS considers that the new draft *Historic Centre (Old Town) of Tallinn Comprehensive Management Plan 2035*, in tandem with the *Tallinn Old Town Conservation Area Policy Bill*, should provide a sound basis for sustaining the Outstanding Universal Value of the Historic Centre (Old Town) of Tallinn World Heritage property.

However, as the actions outlined on pages 20-21 – namely the collection of baseline data, the setting of targets, and the identification of implementation measures – constitute, in effect, “a plan to make a plan” to address key issues, ICOMOS advises that the State Party submit a further revised draft Management Plan to the World Heritage Centre for review by the Advisory Bodies.

ICOMOS remains at the disposal of the State Party for further clarification on the above or assistance as required.

ICOMOS, Charenton-le-Pont
May 2025

Appendix 1: Brief Synthesis of Outstanding Universal Value

The Historic Centre (Old Town) of Tallinn is an exceptionally complete and well-preserved medieval northern European trading city on the coast of the Baltic Sea. The city developed as a significant centre of the Hanseatic League during the major period of activity of this great trading organization in the 13th-16th centuries.

The combination of the upper town on the high limestone hill and the lower town at its foot with many church spires forms an expressive skyline that is visible from a great distance both from land and sea.

The upper town (Toompea) with the castle and the cathedral has always been the administrative centre of the country, whereas the lower town preserves to a remarkable extent the medieval urban fabric of narrow winding streets, many of which retain their medieval names, and fine public and burgher buildings, including town wall, Town Hall, pharmacy, churches, monasteries, merchants' and craftsmen' guilds, and the domestic architecture of the merchants' houses, which have survived to a remarkable degree. The distribution of building plots survives virtually intact from the 13th-14th centuries.

The Outstanding Universal Value of the Historic Centre (Old Town) of Tallinn is demonstrated in its existence as an outstanding, exceptionally complete and well preserved example of a medieval northern European trading city that retains the salient features of this unique form of economic and social community to a remarkable degree.

Criterion (ii): The Historic Centre of Tallinn, among the most remote and powerful outposts of the colonizing activities of the Hanseatic League in the north-eastern part of Europe in the 13th-16th centuries, provided a crucible within which an international secular-ecclesiastical culture resulting from the interchange of Cistercians, Dominicans, the Teutonic Order and the traditions of the Hanseatic League, formed and was itself exported throughout northern Europe.

Criterion (iv): The town plan and the buildings within it constitute a remarkable reflection of the coexistence of the seat of feudal overlords and a Hanseatic trading centre within the shelter of a common system of walls and fortifications.

The full Statement of Outstanding Universal Value for the Historic Centre (Old Town) of Tallinn World Heritage property is available at <https://whc.unesco.org/en/list/822>.

Annex II

Media entries regarding the extension of the Tallinn Secondary School of Science located within the World Heritage property 'Historic Centre (Old Town) of Tallinn'. Last accessed on 12 May 2025 via:

<https://www.threeplusone.ee/work/tallinn-secondary-school-of-science/>
and https://www.linkedin.com/posts/keller_keller-nordlinehitus-tallinnareaalkool-activity-7264572951524483073-hiQU.



Tallinn Secondary School of Science

2022 / II prize / 12 500 m²

Category: [Public](#), [Education](#), [Infrastructure](#)

Authors: Gert Guriev, Karin Harkmaa, Markus Kaasik, Jana Pärn, Siim Tiisvelt

The purpose of the competition was to propose the extension of the Tallinn Secondary School of Science.

The space between existing and new volumes plays an important role as the main entrance to the school. It forms an essential axis crossing Estonia Boulevard, which is marked by a distinctive pavement on the pedestrian promenade and leads to the Real School museum through the low volume between the existing and new buildings of the school.

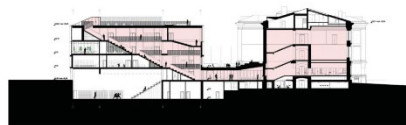
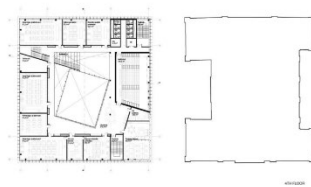
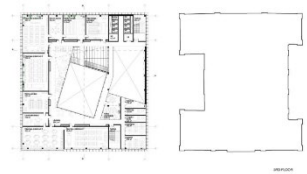
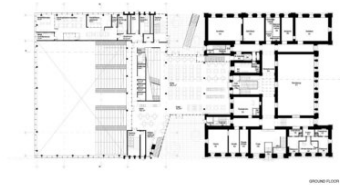
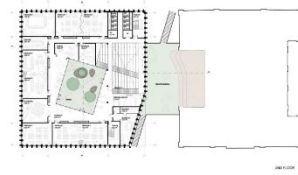
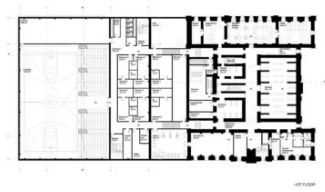
On both sides of the complex remains green areas that complement the existing park and Old town bastion area. The school playground behind the building is designed for sports activities and large events.

The new extension emphasizes the simple logistical structure of the existing building. Rather than compete with the existing building new one adds a fresh pair next to it. Moreover, it visually interacts with the urban space engaging in dialogue with surrounding buildings. On the exterior of the building, different units of the school

building are accentuated floor by floor and open onto the urban space with large glass surfaces.

The Design of the building follows principles that promote communication between students. The heart of the building is a spacious staircase that starts from the entrance area and connects all floors together. The gallery, connecting the extension with the existing building, contains the lobby, canteen, and cafe and becomes a meeting place for all users.







KELLER

141,754 followers

5mo



Keller on alustanud Tallinna Reaalkooli ehitussüvendi rajamist.

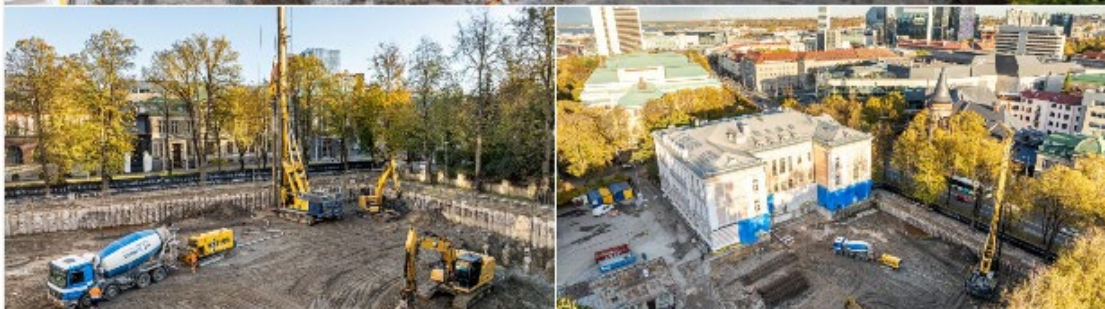
Reaalkooli juurdeehituse käigus rajatakse 2 maa-alust korrust, kuhu tulevad spordisaal ja õppeklassid. Maa-aluse parkla süvendi seinte tarbeks süvistab Keller lõikuvvaidadest tugiseina ning ankurdam selle pinnaseankrutega, süvistab hoone kandevvaidad, alatoestab olemasoleva koolihoone otsaseina. Ehituse tellijaks on Tallinna Linnavaaramet ning peatöövõtjaks OÜ Nordlin Ehitus.

Keller has started excavation pit construction works for Tallinn Secondary School of Science extension.

School is located in heart of Tallinn, between the historic Old Town and modern Tallinn.

School extensions work includes -2 floor underground floors, where sports field and some of classrooms will be located. Keller's scope is underpinning of existing school building, drilling a secant pile wall for all the building perimeter, drilling self-drill anchors to support the wall and also drilling of building bearing piles. Main client is Tallinna Linnavaaramet and general contractor is OÜ Nordlin Ehitus.

[#Keller](#) [#Nordlinehitus](#) [#Tallinnareaalkool](#)



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