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Ambassador Extraordinary and
Plenipotentiary
Permanent Delegate of the Republic of
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Ambassade de la République d'Estonie
17 rue de la Baume
75008 Paris

7 May 2024

**Culture Sector
World Heritage Centre**

Ref: CLT/WHC/ENA/24/14841

Dear Ambassador,

I am pleased to transmit herewith the ICOMOS Technical Review of the proposed annex to the Estonia Theatre within the World Heritage property **'Historic Centre (Old Town) of Tallinn'**.

In its Technical Review, ICOMOS states that the proposed annex would overshadow the historic Estonia Theatre without architectural integration, suggesting that consideration should be given to building a new theatre elsewhere in Tallinn to fully realise the architectural potential while meeting operational needs. ICOMOS emphasises that if further consideration is given to the construction of an annex to the historic theatre, the scope of intervention in the existing building should be defined through broad consultation in order to preserve cultural heritage values, including the physical fabric and local context, and to assess the strategies necessary to sustain them. This approach would guide the Cultural Heritage Impact Assessment (HIA), following the *2022 Guidance and Toolkit for Impact Assessment in a World Heritage Context*¹, to explore the potential for intervention. Finally, ICOMOS concludes that the annex should be subordinate in scale and massing to the historic building in order to be deemed acceptable.

I would therefore be grateful if you would share the attached ICOMOS Technical Review (see **Annex**) with your relevant authorities for their consideration, and invite them to keep the World Heritage Centre informed of any relevant updates on this matter and of any follow-up provided to its recommendations, and to submit the HIA, once completed, to the World Heritage Centre for review and comment by ICOMOS International. As is customary, ICOMOS and the World Heritage Centre remain at their disposal for any clarification or assistance they may require.

I would also like to take this opportunity to acknowledge with thanks receipt of the letter from Martin Karro, Head of the Tallinn Urban Planning Department, dated 15 April 2024 regarding the construction of a high-rise building adjacent to the boundaries of the buffer zone of the World Heritage property. Please be assured that I have taken note of the adoption of the detailed plan of the development by the Tallinn City Council in compliance with the 'Statutes of the Tallinn Old Town Heritage Conservation Area' and the regulations related to the buffer zone of the property. I acknowledge that the building is located within the high-rise building area and is in accordance with the 'Location of high-rise buildings in Tallinn' thematic plan, including its height requirements, and the 'Tallinn General Plan'. I have also noted that the Outstanding Universal Value (OUV) of

¹ Available at <https://whc.unesco.org/en/guidance-toolkit-impact-assessments/>.

the property is included in all of the above-mentioned documents and welcome the confirmation that the new Management Plan for the 'Historic Centre (Old Town) of Tallinn' will be transmitted to the World Heritage Centre prior to its finalisation. Please note that the information provided has been shared with ICOMOS International for information purposes.

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

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Lazare Eloundou Assomo', is written over a horizontal line.

Lazare Eloundou Assomo
Director

Enc.: ICOMOS Technical Review

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

Annex

**ICOMOS Technical Review on the 'Proposed 'annex' to the Estonia Theatre'
within the World Heritage property 'Historic Centre (Old Town) of Tallinn'.
Received by the World Heritage Centre on 30 April 2024.**

ICOMOS Technical Review

Property	Historic Centre (Old Town) of Tallinn
State Party	Estonia
Property ID	822bis
Date of inscription	1997
Criteria	(ii)(iv)
Project	Proposed 'annex' to the Estonia Theatre

Background

The Technical Review assesses a letter from the Estonian Ministry of Culture to UNESCO, dated 15 February 2024, with the following enclosures:

- Detailed overview of the ongoing debate concerning possible annex to Estonia theatre,
- Extras (maps, visualisation of the property, sketches).

In 2020, the Estonia Theatre applied for state funding to construct an annex to its historic home in Tallin, to provide an opera and ballet theatre suited to modern needs. In 2021, the Estonian Parliament decided in principle to finance the construction of the annex as a 'cultural object of significant importance'. Subsequent diagrammatic visualisation of an annex to meet the 'optimal spatial requirements of the theatre' exposed the conflict between the artistic ambitions of the Theatre and the conservation of the existing building, which is both a national monument and an integral part of the World Heritage property, Historic Centre (Old Town) of Tallinn. On 20 February 2024, ICOMOS received the letter from the State Party of Estonia, transmitted by the World Heritage Centre on the plans for the theatre annex. The Advisory Body provides its analysis of the documentation received below.

The context

The medieval town walls of Tallinn were surrounded by renaissance fortifications in 1530-50, reconstructed on a larger scale in 1750-70. These fortifications were demolished in the middle of the 19th century, although substantial structural remains survive below ground. Most of the fortification zone subsequently became a public park, in which a few, mostly public, buildings were constructed (Fig 1). In this zone, on the south-east side of the historic city, the Estonia Theatre and Concert Hall was completed in 1913 to the design of Finnish architects Lönn and Lindgren, in a mixture of Art Nouveau and Neoclassical styles. The building was badly damaged in an air raid in 1944, but reconstructed without delay in 1945-7, the new work being in the post-war Neo-Classical style.

The structure was conceived as two monumental parallel halls (for theatre/opera and concerts), linked by supporting accommodation. The entrance front to Estonia Boulevard faces south-east across Theatre Square, part of a formally planned, post-fortification, suburb. The general form and style of the Estonia Theatre were retained in the post-war reconstruction (Fig 2). The opposite elevation, addressing the historic centre, was originally completely different (Figs 6-7), but during the reconstruction the ends of the two halls were treated as flat rather than bowed versions of those on the entrance front, each with a giant order but set above an inconsequential central door (Fig 8). A full height 13-bay link block of ancillary accommodation was slightly recessed between them. The pre-1944 elevation was arguably more interesting, with an 'active frontage' at ground level (Fig 6).

Architecturally, the outstanding significance of the building seems to reside principally in the unique

plan and massing of its two parallel halls with their distinctive, prominent rooflines and silhouette, particularly of the theatre; and the treatment of the Theatre Square front (Fig 2). These are the characteristics that have in essence been sustained from the outset and give the building its unique identity and monumental dignity. From its conception, the Estonia Theatre has been 'one of the most important symbolic objects of the Estonian cultural and political scene from the moment of its inauguration', associated with nationally important events throughout the 20th century. Its speedy reconstruction in 1945-7 bears testament to this symbolic value expressed through its distinctive architectural form.

The proposal

The proposal is to build a new theatre on the landscaped open space between the historic building and Pärnu mnt., facing the historic centre. The first iteration of diagrammatic sketches (Fig 3) shows a new building of considerable height and bulk, close to the 1945-7 north-west (end) walls of the existing auditoria and returning through the site of the central link-block to occupy most of the existing central courtyard. A committee jointly appointed by the City of Tallinn and the Estonian National Opera in 2022 produced two further iterations of the diagrammatic scheme, with successive modest reductions in height and bulk (Figs 4-5), but no agreement has been reached on an acceptable scheme. The third iteration would still require flat-roofed cubic volumes as high as the ridge of the existing concert hall and a fly tower as high as the apex of the existing Opera House fly tower roof.

Assessment

The parliamentary decision in principle to provide funding was made on the implicit assumption that the 'annex' could be designed to meet all the requirements of existing legislation, not least with regard to heritage conservation and urban planning. The joint committee has evidently worked hard to minimise the volume of new building necessary to meet the operational requirements of the Estonian National Opera. However, there appears to be a consensus among national and local authorities and experts that the result still cannot be accommodated on the site proposed. ICOMOS sees no reason to disagree with that conclusion. The 'annex' would be of a greater scale than the existing building, becoming the dominant element of the ensemble from all views, while lacking architectural dialogue with the historic Estonia Theatre.

One possibility which should now be explored is the construction of what amounts to a new, self-contained theatre elsewhere in Tallinn, that could allow the architectural potential of a new public building to be fully realised, without compromising operational requirements.

If further consideration is given to building the theatre as an 'annex' to the historic one, the starting point should be to define the scope for intervention in the existing building without material harm to its outstanding cultural heritage values, seeking through wide consultation to assess the range and strength of cultural heritage values which people attach to the place, how and to what extent they are expressed in its physical fabric and local context, and the strategies necessary to sustain them. This would then form the basis for exploring the potential for intervention through the iterative process of Cultural Heritage Impact Assessment.

Conclusion

The ambition of the Estonian Opera to build a new opera house to modern standards and the decision of the Estonian Parliament to fund it are in themselves laudable, with the potential to deliver major cultural benefits for Tallinn and Estonia. That the project is in conflict with sustaining the outstanding cultural heritage values of the existing Theatre, and of the Outstanding Universal Value of the historic centre to which it contributes, seems to be a regrettable consequence of failing to demonstrate the practicality of the concept before seeking funding for it.

The potential for an annex to the existing building, engaging with its north-west elevation and potentially replacing its central section, might reasonably be explored through Cultural Heritage Impact Assessment; however, to be acceptable, an annex must be subsidiary in scale and massing to the historic building. It has been demonstrated that a new building of the scale and complexity envisaged by Estonian National Opera cannot be accommodated in this way; either the ambition of the project needs to be scaled back to fit the constraints of the site, or the concept realised elsewhere.

It is advised that impact assessment for ensuing proposals follow the methods set out in the 2022 *Guidance and Toolkit for Impact Assessment in a World Heritage Context*.

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

ICOMOS, Charenton-le-Pont
April 2024

Appendix 1: Statement 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.

Integrity

The boundaries of the inscribed World Heritage property and its buffer zone were modified in 2008 in order to bring the boundaries of the inscribed property in conformity with the boundaries of the Tallinn Old Town Conservation Area, recognized as a national monument in Estonia. The historic centre of Tallinn World Heritage property (thus increased from 60 ha. to 113 ha.) now encompasses the upper town (Toompea), the lower town inside the medieval walls, as well as the 17th century historic fortifications surrounding the entire Old Town, and a range of primarily 19th century structures, streetscapes and views, which today form a green area around the medieval city. This modification has ensured inclusion of all primary elements contributing to the outstanding universal value of the property, and strongly enhanced its completeness and integrity.

The buffer zone, increased from 370 ha to 2253 ha, also in 2008, now protects the immediate setting of the inscribed property in a much more complete fashion. Extended to the sea to include views from Viimsi and Kopli peninsulas, the buffer zone now includes 9 view sectors and 5 view corridors.

To date, Tallinn has maintained its characteristic skyline visible from both the sea and the land. The characteristic skyline however could be vulnerable because of planned high rise development outside the buffer zone.

Authenticity

The site preserves to a remarkable extent the medieval urban structure of building plots, streets and squares, set out in the 13th century, as well as medieval urban fabric. The radial street network is well endowed with buildings from the 14th-16th centuries. The town defences have been preserved over large sections at their original length and height, rising to over 15m in places.

In addition to architectural continuity, Old Town has retained its traditional use as a living city, hosting domestic, commercial and religious functions, and retaining the upper town as the administrative centre of the country. Nevertheless increasingly historic residential buildings are being refurbished for touristic or public use and thus subject to increased life safety and accessibility requirements.

The authentic setting of the inscribed World Heritage property includes some significant architecture from the late 19th century and early 20th century including theatres and schools as well as a number of exceptional wooden suburbs which form an integral part of the historic, urban fabric round Tallinn Old Town.

Until recently the survival of the wooden quarters was threatened by unclear ownership in the years following independence and in a general indifference to the qualities they offered residents. This latter could be seen in a lack of maintenance, and inappropriate upgrading and repair approaches. Today however the situation is turned around and these wooden areas are much valued, and adequate measures are in place to maintain their authenticity.

Protection and management requirements

The Tallinn Old Town conservation area established in 1966 by regulation Nr 360 of the Council of Ministers of the Estonian Socialist Soviet Republic (ESSR), and confirmed in 1996 by the Ministry of Culture of the Republic of Estonia, was the first conservation area established in the former USSR. It was intended to sustain the well-preserved physical substance and integrity of the entire property.

Several contemporary legislative and local government documents also complement the protection of the values of Tallinn Old Town and regulate its administration. These include the Statutes of the Heritage Conservation Area of Tallinn Old Town (Historic Centre) based upon the Heritage Conservation Act of 2002 (amended in 2011). These Statutes, fully applicable to the inscribed property following increase of the boundaries of the property in 2008 and its buffer zone, are focused on managing preservation, conservation, planning and building activities within the area and related supporting administrative arrangements. More specifically, the Statutes provide for maintaining the historic plot structure, building volume and density, historic structures and details of the World Heritage property.

The revised Heritage Conservation Act ensures that research and design permits and activity licensing provisions apply to all structures within the World Heritage property, not just listed monuments. These ensure that all necessary historical and archaeological research is conducted before any building activity is carried out in the inscribed property.

Responsibility for implementation of these regulations and statutes is shared between the National Heritage Board and the Tallinn City Government. Overall supervision is conducted by the National

Heritage Board (state level), while the Tallinn Cultural Heritage Department (municipal level) is in charge of direct implementation of the statutes. Experts of the Heritage Conservation Advisory Panel provide consultation on specific questions and issues. Decisions concerning planning and building within the World Heritage property are made by consensus of the National Heritage Board and Tallinn City Government.

The Tallinn Old Town Management Committee has been established in 2010 to strengthen cooperation and co-ordination among responsible organizations, NGOs, local community and other stakeholders. It is also responsible for approving, enhancing and monitoring implementation of the comprehensive management plan of the property (scheduled to be finalized by December 2011). The latter plan will replace the “Development Plan of Tallinn Old Town” 2008-2013, enacted on 28 August 2008, and give prominence to protecting the Outstanding Universal Value of the property.

Existing management provisions are aided by municipal initiatives (appointment of a full time archaeologist the Cultural Heritage Department in 2010, to increase provisions for archaeological monitoring where new work is envisioned) and guidance obtained from important public forums (e.g., the May 2002 conference “Alternatives to Historical Reconstruction in UNESCO World Heritage Cities” whose concluding resolution provides a number of key principles guiding future development within the inscribed property).

Future management strategies should support efforts to strengthen provisions for sustaining authenticity and integrity. Management strategies must attempt to balance residential use with other private/public uses which may threaten the authenticity of the affected structures. The threat to integrity from high rise development outside of the buffer zone is partly addressed in the thematic plan “Framework for high-rise buildings in Tallinn” (adopted by Tallinn City Council in 2008), which contributes to the protection of the skyline, and associated view sectors and view corridors. However effective use of the Thematic Plan to fully preserve the visual integrity of the World Heritage property requires efforts to strengthen consensus among all concerned stakeholders about effective means for in situ implementation of the Plan in all identified view sectors.

Figures

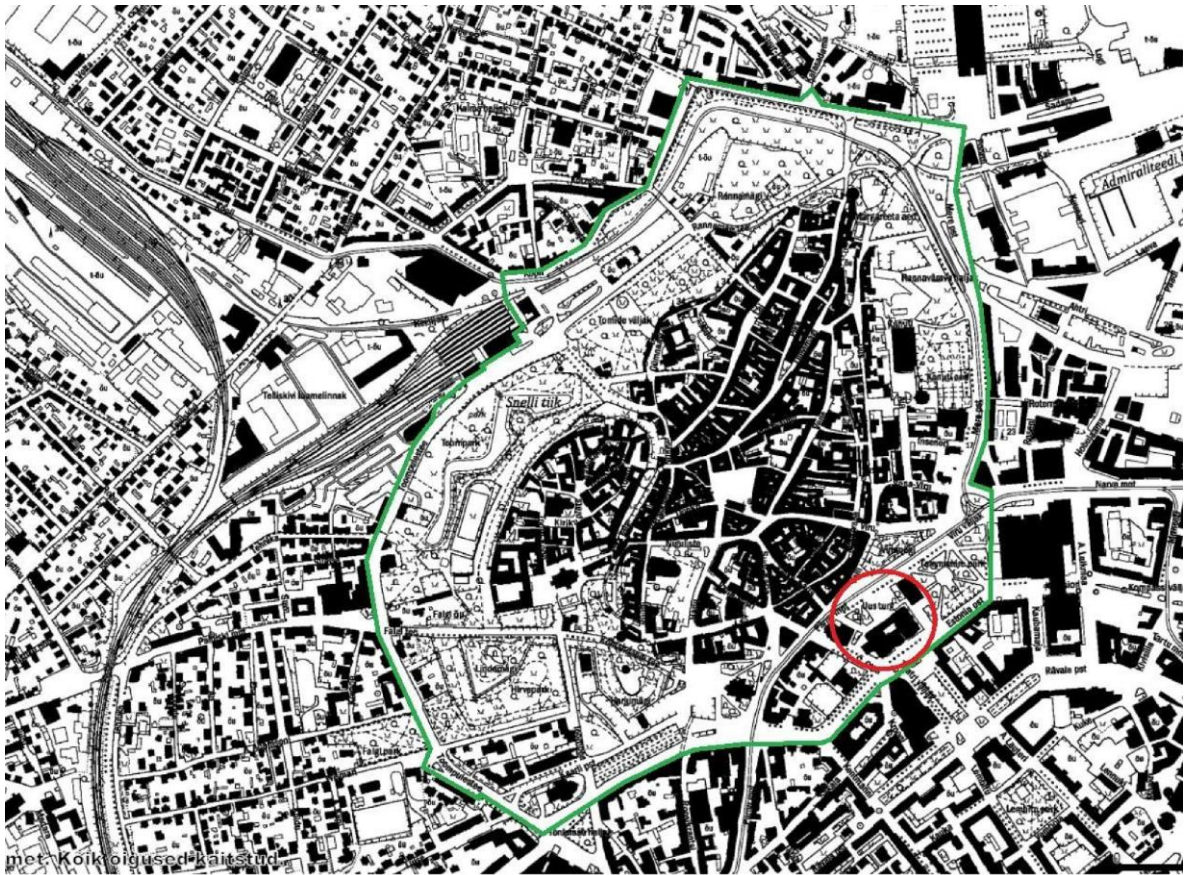


Fig 1 The location of the Estonia Theatre (ringed red) in relation to the World Heritage Property (outlined green)



Fig 2 The Estonia Theatre from the south-east (Theatre Square), with the Old Town in the background (<https://opera.ee/en/about-us/history/>)

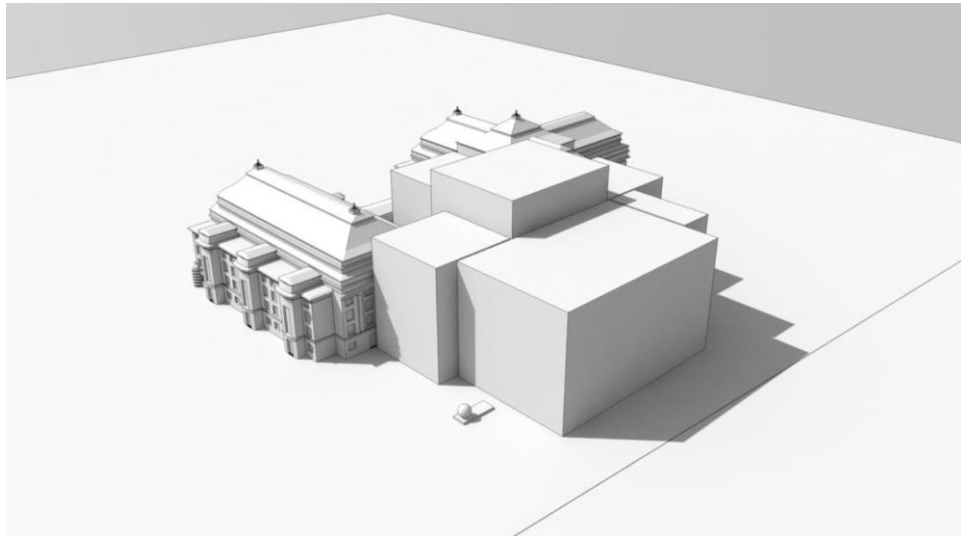


Fig 3 The initial massing sketch for the 'Annexe', seen from the north

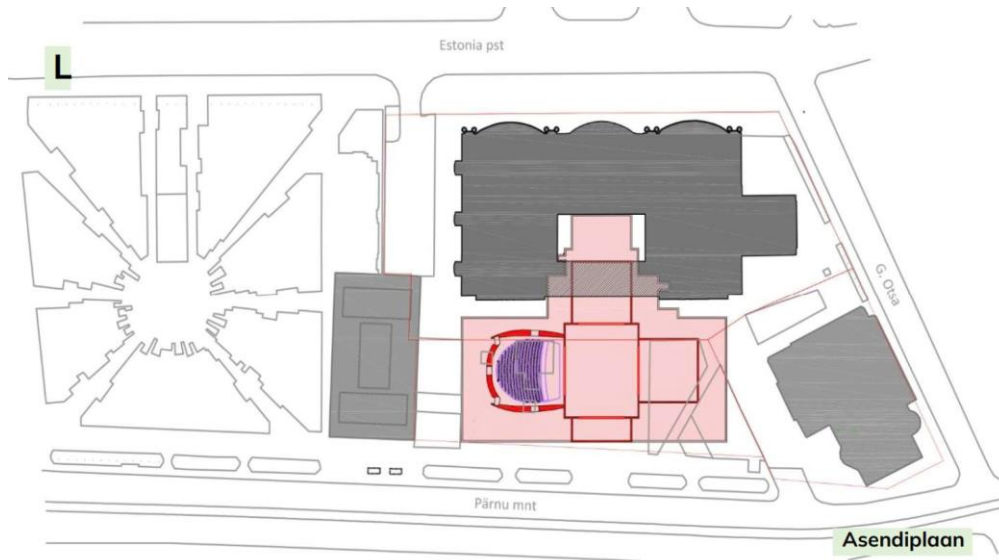


Fig 4 The proposed 'annexe' (red) in relation to the existing Estonia Theatre, after the Joint Committee's work

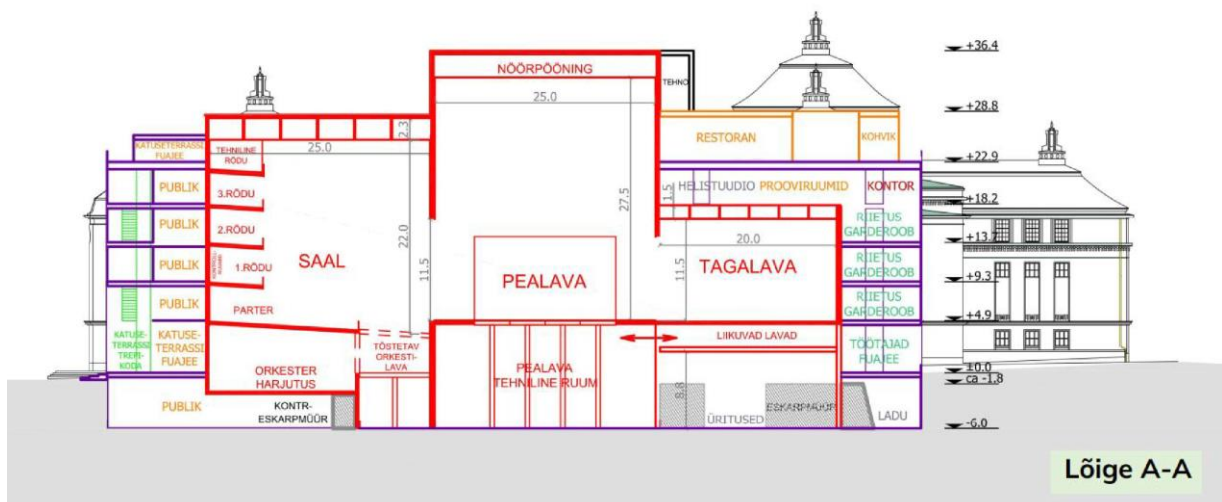


Fig 5 Section (NE- SW) of the proposed annexe to the existing Estonia Theatre, after the Joint Committee's work (Saal: Auditorium, Pealava: Main Stage; Tagalava: Backstage)



*Fig 6 The north-west elevation of the Estonia Theatre from the north-west as built in 1913
(<https://opera.ee/en/about-us/history/>)*



Fig 7 The north-west elevation of the Estonia Theatre after bombing in 1944, by which time two storeys had been added to the centre block (<https://opera.ee/en/about-us/history/>)



Fig 8 The north-west elevation of the Estonia Theatre from Pärnu mnt., facing the Old Town, after rebuilding, 1945-47