

Lazare Eloundou Assomo
World Heritage Centre
UNESCO Culture Sector
7, place de Fontenoy
75352 Paris 07 SP
France

11 April 2025 No 8.-1/971

Dear Lazare Eloundou Assomo,

With this letter we send to the UNESCO World Heritage Centre a draft of the **Comprehensive Management Plan** for the Historic Centre (Old Town) of Tallinn for review.

Due to the existing regulations at national level, Comprehensive Management Plan for the Historic Centre (Old Town) of Tallinn has been compiled as a local government development document for a specific part of the city territory. It will obtain its legal force through being adopted by Tallinn City Council. Management Plan is well integrated into broader strategic and planning instruments, such as Development Strategy "Tallinn 2035" and specific development plans of the City of Tallinn, and clearly articulated with other relevant plans used to manage World Heritage properties (i. e thematic plan "Location of high-rise buildings in Tallinn") The Plan follows the structure of the Strategy "Tallinn 2035" to facilitate its implementation and specifies the role and activities concerning Tallinn Old Town.

The document is in accord with the Local Government Organization Act, the Statutes of Tallinn, and the Procedures of Processing Development Documents of Tallinn. The Plan fully reflects the principles of the UNESCO World Heritage Convention, its Operational Guidelines and the handbook "Management Plans for World Heritage Sites. A Practical Guide" issued by the German National Commission for UNESCO. The challenges, aims and activities in this document, needed to ensure the conditions necessary to maintain the OUV of the site, were defined in cooperation with representatives of state and non-governmental organizations as well as inhabitants of the Historic Centre (Old Town) of Tallinn. We have also taken into consideration the suggestion made by ICOMOS in 2013 regarding the previous Comprehensive Management Plan, which was considered very heavy document by ICOMOS, to compile a more compact and user-friendly document. We believe this allows its broader dissemination among the stakeholders and civil society. Dissemination is vital for facilitating general ownership and broader understanding of the OUV of the Site and how this relates to the proposed development principles and the aims of the plan.

The preservation of the OUV of Historic Centre (Old Town) of Tallinn is the guiding principle of the document. Tallinn Old Town has always been and continues to be an important living environment. Therefore, the living conditions and wellbeing of the local population are an important focus of the plan, alongside the conservation of the physical attributes of the Site. The need to find sustainable solutions to societal challenges that are compatible with the conservation needs of the World Heritage property has been considered in the Comprehensive Management Plan as of utmost importance to maintain the OUV of the Site. We recognize the fundamental role of civil society in heritage practice and believe that the active participation of the local communities is key for protecting heritage sites.

The Comprehensive Management Plan has passed public review process (27 January – 28 February 2025) and public hearing (8 April 2025) with gaining beneficial feedback from the local communities.

With the draft of Comprehensive Management Plan, we send to you for information **Tallinn Heritage Conservation Area Protection Policy Bill**, which is awaiting adoption by Estonian Government. Estonian National Heritage Board was the leading party in compiling the draft of the

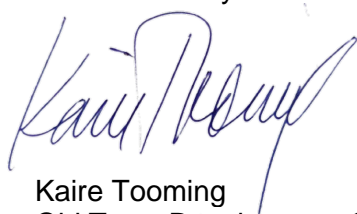
Bill. A broad-based working group of experts from the Estonian National Heritage Board, the Tallinn Urban Planning Department and other experts in the field of heritage protection, was formed to develop this normative instrument. Upon adoption, this Bill will replace the current Statutes of the Heritage Conservation Area of Tallinn Old Town in regulating the conservation of the Tallinn Old Town Conservation Area i. e WH property Historic Centre (Old Town) of Tallinn, and its Buffer Zone.

Comprehensive Management Plan for the Historic Centre (Old Town) of Tallinn and Tallinn Heritage Conservation Area Protection Policy Bill will reinforce each other and form the legal basis for the management of Historic Centre (Old Town) of Tallinn and its Buffer Zone.

In the draft Comprehensive Management Plan for the Historic Centre (Old Town) of Tallinn slightly supplemented OUV attributes have been used. These attributes have been refined during the process of Heritage Impact Assessment of the Extension of Estonia Opera House (submitted to UNESCO for review in March 2025). Supplementing the OUV attributes described in the Tallinn Old Town Comprehensive Management Plan for 2014–2021 was a result of expert discussions which resulted in adopting the values described in Tallinn Heritage Conservation Area Protection Policy Bill. The list of values set out therein has been created as a result of broad-based work, primarily based on sectoral expert opinion, so it is justified to use them in supplementing the OUV attributes that remain true to the adopted Statement of the OUV. The supplemented attributes form the baseline data against which all future impacts will be measured when regulating the protection of Tallinn Old Town.

Given the tight timeline established by the Tallinn City Council for document processing procedures, we would greatly appreciate receiving your feedback on the submitted Comprehensive Management Plan within one month, by 12 May 2025 at the latest. As the review by ICOMOS is essential for initiating the next steps that will lead to the approval of the document by Tallinn City Council, your prompt attention to this matter would be highly valued.

Yours sincerely



Kaire Tooming
Old Town Development Coordinator / Site Manager of Historic Centre (Old Town) of Tallinn
Heritage Protection Unit
Tallinn Urban Planning Department

- Enc: 1. The Comprehensive Management Plan for the Historic Centre (Old Town) of Tallinn (draft)
2. Tallinn Heritage Conservation Area Protection Policy Bill (awaiting adoption by Estonian Government)