

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

10 April 2025

**Culture Sector
World Heritage Centre**

Ref: CLT/WHC/ENA/25/15206

Dear Ambassador,

I would like to acknowledge receipt of your transmission of the Heritage Impact Assessment (HIA) concerning the planned extension of the Estonia National Opera within the World Heritage property '**Historic Centre (Old Town) of Tallinn**' on 13 March 2024, as well as of the slightly revised version transmitted by the Tallinn Urban Planning Department on 21 March 2024.

I would also like to express my appreciation for the constructive dialogue that the Estonian National Commission for UNESCO has maintained with the World Heritage Centre regarding this proposed development.

As you may be aware, in parallel, the Riigikogu's Committee on Cultural Affairs contacted the World Heritage Centre on 24 March 2025, pointing out that the HIA was still ongoing and had neither been completed nor approved by the Cultural Affairs Committee.

I would therefore like to confirm that the HIA and associated documentation submitted by you were transmitted to ICOMOS International for review. and I am pleased to transmit herewith the resulting Technical Review. ICOMOS has found the Heritage Impact Assessment to be thorough and systematic, given the available information, effectively evaluating the visual and physical impacts, primarily in terms of building volume. ICOMOS fully supports the first recommendation of the HIA, which is consistent with the previous 2024 Technical Review, and stresses that the proposed extension to the National Opera should be abandoned as it poses a threat to the authenticity and integrity of the World Heritage property and risks setting a harmful precedent for heritage and environmental protection in Estonia. ICOMOS concludes that if the National Opera is unable to meet its needs through more modest modifications in accordance with the conditions set by the National Heritage Board, a new location within Tallinn should be considered.

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

Moreover, I have taken note of the Riigikogu's Committee on Cultural Affairs to visit UNESCO Headquarters. I would like to confirm through you the availability of the World Heritage Centre and the Advisory Body to welcome the relevant stakeholders and engage in constructive discussions. Should you wish to arrange such a meeting, my colleague Berta de Sancristóbal, Head of the Centre's Europe and North America Unit, is available at b.de-sancristobal@unesco.org for further coordination.

I would also like to take this opportunity to reiterate the availability of the World Heritage Centre and ICOMOS to undertake a joint Advisory mission to the World Heritage property, should your competent authorities deem it helpful to inform the ongoing decision-making process, that has sparked significant national debate. As outlined in the Operational Guidelines for the Implementation of the World Heritage Convention, Advisory missions provide expert guidance to a State Party on specific matters, with the full cost being borne by the State Party inviting the mission.

Considering the number of stakeholders who have contacted the World Heritage Centre regarding this project, it may be helpful to recall that paragraph 13 of the Operational Guidelines requires States Parties to provide the Secretariat with the names and contact details of the governmental organisation(s) primarily responsible as National Focal Point(s) for the implementation of the Convention. This enables the Secretariat to send copies of all official correspondence and documents to these National Focal Points, as appropriate. In the case of Estonia, the World Heritage Centre was informed by the Estonian National Commission for UNESCO in November 2024 that this role is held by the Cultural Heritage Department at the Ministry of Culture. I would therefore appreciate it if future correspondence could be coordinated through the designated focal to ensure seamless communication with the World Heritage Centre.

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 'L. Assomo', with a stylized flourish extending to the right.

Lazare Eloundou Assomo
Director

Enc.: ICOMOS Technical Review

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

Annex

ICOMOS Technical Review on the Heritage Impact Assessment of the Extension of the Estonia Theatre within 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)
Project	Extension of the Estonia Theatre

Introduction

On 14 March 2025, ICOMOS received information from the State Party of Estonia, via the World Heritage Centre, concerning the World Heritage property “Historic Centre of Tallinn”. This information comprised the Heritage Impact Assessment (HIA) prepared for the project of the extension of Estonia Opera House. The Advisory Body provides its analysis of the project below.

Background

A previous ICOMOS Technical Review (April 2024) of a concept proposal for a new opera house to be built as an ‘annex’ to the Estonia Theatre and Concert Hall concluded that the project was in conflict with sustaining the outstanding cultural heritage values of the existing Theatre, and the Outstanding Universal Value (OUV) of the “Historic Centre (Old Town) of Tallinn” World Heritage property to which it contributes. The Technical Review namely noted that:

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.

The State Party has now submitted a Heritage Impact Assessment (HIA) of the project commissioned by its National Heritage Board, *Extension of Estonia Opera House* (Triin Ojari, March 2025).

Analysis

The subject of the HIA is a proposal to build a new opera house alongside, and integrated with, the historic Estonia Theatre, in the form considered in the previous ICOMOS Technical Review. That represented the third iteration of a diagrammatic design put forward by the Estonian National Opera, which it believed represented the minimum volume necessary to deliver its operational requirements. Its height and bulk nonetheless remained substantially greater than that suggested as a maximum in a volumetric study by Tallinn Urban Planning Department, or through the special conditions of heritage protection issued by the National Heritage Board.

The HIA considers that that “Estonia Theatre and Concert Hall, located in the fortifications area of Tallinn Old Town, is one of the most important architectural landmarks and symbolic buildings in Estonia – both a historical and a building monument, located in the Tallinn Old Town Conservation Area” (p. 4). The draft HIA was subject to extensive public consultation; the responses, and amendments made in consequence, are tabulated at pp. 69-96 of the HIA.

The assessment begins by identifying the relevant attributes of the OUV of the Historic Centre (Old Town) of Tallinn World Heritage property, ‘slightly supplemented’ from those identified in the *Tallinn*

Old Town Comprehensive Management Plan 2014-2021 (2014). A review of new building in the World Heritage property post-inscription concludes that all have been constructed in established building blocks, with no encroachment on or reduction of public urban space, particularly the landscaped area of the former post-medieval fortifications (HIA, p. 16). The comprehensive legal provisions for the conservation of the Old Town are set out. The evolution of the urban space around the Estonia Theatre is detailed, including the New Market, held there until the mid-twentieth century.

Section 4 of the HIA assesses the impacts of the final iteration of the concept proposed by the Estonian National Opera, alongside the smaller-scale volumetric concept suggested by the Tallinn Urban Planning Department and a volume analysis in conformity with the special conditions of heritage protection of the Estonia Theatre and Concert Hall, issued by the National Heritage Board on 22 May 2024. Summary Tables of the impacts on attributes of all three concepts are appended to this Technical Review (Annex 1).

Section 5 of the HIA concludes that the first option, while it would enrich the Old Town as a cultural environment, “has a major negative impact on all the identified OUV attributes, and it is impossible to highlight mitigation measures” (HIA, p. 55). The alternative concept suggested by the Urban Planning Department would have a lesser, but still high, impact on OUV, while expansion within the Heritage Board’s special conditions would have little or no impact on attributes which sustain the OUV, although it could be damaging to the interior of the monument.

Conclusion and recommendations

The Extension of Estonia Opera House Heritage Impact Assessment is methodical and comprehensive within the limitations of the information available, which allows for the assessment of visual and physical impacts, primarily at volumetric level. Contrary to some of the criticism of the draft in consultation, the HIA at this stage is an entirely appropriate initial step in considering the feasibility of a major project in a sensitive location.

ICOMOS strongly endorses the first recommendation of the HIA (6.1, p. 56), which is in line with ICOMOS’ earlier advice:

To abandon the extension of Estonia Opera Theatre in the form proposed by the National Opera, as it would threaten the authenticity and integrity of the Old Town of Tallinn as a World Heritage Site and would be a bad precedent for the protection of Estonia’s heritage, nature conservation at national and international scale.

It follows that, unless Estonian National Opera can achieve its needs through smaller-scale structural interventions, broadly in line with the special conditions set by the National Heritage Board (HIA, 6.2), an alternative location in Tallinn would have to be sought for a new opera house (HIA, 6.4). That would secure the cultural benefits of a new opera house for the city, and allow architectural quality to be delivered on a site suited to the operational parameters that are required of a new building.

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

Annex 1

Summary table: Extension of Estonia Opera Theatre in the form desired by the Estonian National Opera

Impact Characteristic	Visual impact	Functional and operational impact	Physical impact	Cumulative impact	Impact on management
A diverse living, business and cultural environment	high negative impact	moderate positive impact	moderate negative impact	high negative impact	moderate negative impact
Historic Memory site	low negative impact	moderate negative impact	moderate negative impact	negligible	negligible
Urban fortifications	negligible	moderate positive impact	high negative impact	negligible	moderate negative impact
Culturally valuable architecture	high negative impact	moderate positive impact	high negative impact	moderate negative impact	high negative impact
Urban space elements	high negative impact	moderate negative impact	moderate negative impact	moderate negative impact	negligible
Observability	high negative impact	moderate negative impact	negligible	negligible	negligible
Integrity of the fortifications area	high negative impact	high negative impact	high negative impact	high negative impact	negligible

Summary table: Option from the Tallinn Urban Planning Department

Impact Characteristic	Visual impact	Functional and operational impact	Physical impact	Cumulative impact	Impact on management
A diverse living, business and cultural environment	moderate negative impact	moderate positive impact	moderate negative impact	low negative impact	low negative impact
Historic Memory site	low negative impact	low negative impact	negligible	negligible	negligible
Urban fortifications	negligible	low negative impact	low negative impact	negligible	negligible
Culturally valuable architecture	moderate negative impact	low positive impact	moderate negative impact	high negative impact	negligible
Urban space elements	moderate negative impact	low negative impact	moderate negative impact	low negative impact	negligible
Observability	moderate negative impact	negligible	high negative impact	low negative impact	high negative impact
Integrity of the fortifications area	moderate negative impact	low negative impact	low negative impact	low negative impact	moderate negative impact

Summary table: Volume analysis under special heritage conditions

Impact Characteristic	Visual impact	Functional and operational impact	Physical impact	Cumulative impact	Impact on management
A diverse living, business and cultural environment	neutral	neutral	neutral	negligible	low negative impact
Historic Memory site	moderate negative impact	neutral	high negative impact	negligible	negligible
Urban fortifications	neutral	neutral	neutral	negligible	negligible
Culturally valuable architecture	moderate negative impact	negligible	moderate negative impact	negligible	moderate negative impact
Urban space elements	neutral	neutral	negligible	negligible	neutral
Observability	low negative impact	negligible	low negative impact	negligible	negligible
Integrity of the fortifications area	neutral	neutral	neutral	neutral	neutral