

Estonian Academy of Music and Theatre, Tatari 13, Tallinn
Estonian Music Council, Suur-Karja 23, Tallinn

Dear Triin Ojari, author of the impact assessment of the extension of Estonian National Opera

We thank you for the invitation to comment on the final version of the impact assessment. Please consider this document and these comments as a separate opinion appended to the impact assessment.

One of the most painful issues in Estonian culture has been the long-standing lack of an appropriate venue for opera and ballet, a problem that has been under discussion for about 80 years. The matter is not merely the insufficient acoustics and spatial constraints mentioned in the first chapter of the impact assessment, but also the fact that Estonian people have, for decades, been culturally discriminated against compared to citizens of most European countries. The Estonian National Opera operates in a building originally built as a drama theatre – a hall that offers extremely limited possibilities for staging musical productions at a modern international level. The acoustics of the drama theatre and its underperforming stage result in a lackluster environment that fails to meet the needs of the artists, the orchestra, the choir, and, most importantly, the audience

That Estonian culture is not listed as a UNESCO world heritage does not make it any less important to us, and an impact assessment should certainly have taken into account a broader cultural context in line with UNESCO's overall mission. The stunted development of Estonian opera and ballet, the inability to create and stage musical productions at a truly modern international level, the lack of participation in international collaborations with other music theatres, and the failure to host world-class ballet and opera artists on our stages are an extraordinarily serious cultural problem. For this reason, the Riigikogu (Parliament) officially included the extension of the Estonian National Opera in its list of culturally significant constructions in September 2021—and has twice expressed its clear intention regarding the extension.

It is generally puzzling that, in haste and with little regard for the principles of good management, an impact report has been ordered and prepared for an object whose parameters are currently hypothetical and for which an international design competition has not yet been held. After counting the buildings in Tallinn's Old Town as part of the UNESCO list—over ten buildings such as the Danish Embassy on Wismari Street, an apartment building at Kaarli pst 8, Vabamu (Museum of Occupations) at Kaarli pst 8, the extension of Kalevi swimming pool, an apartment building at Vana-Viru 13, the VW Passage at Inseneri 1, Aia 10A, the new gymnasium of Realkool, the English College swimming pool, the parking lot at Vabaduse Square, the De la Gardie department store, a new auditorium for Realkool, a new auditorium for Noorsooteater (Estonian Theatre for Young Audiences), a new auditorium for Linnateater (Tallinn City Theatre), and the Ministry of the

Environment building at Toompuiestee 24 - there are, to our knowledge, no impact assessments prepared for these, nor has UNESCO been notified about them, or such notifications have somehow been lost and are no longer accessible.

Against the backdrop of the uncertainty regarding how much of the potential extension would even be built above ground, the categorical statements regarding the large negative visual impact presented in the impact assessment appear subjective, speculative, and biased. Moreover, the reader is not informed about which methodology, data analysis, measurements, or models were used to arrive at these categorical conclusions. Several prominent architects, heritage conservation experts, and urban planning professionals – including voices in the media – have expressed a differing opinion that the extension would not obstruct any views of the Old Town protected by UNESCO.

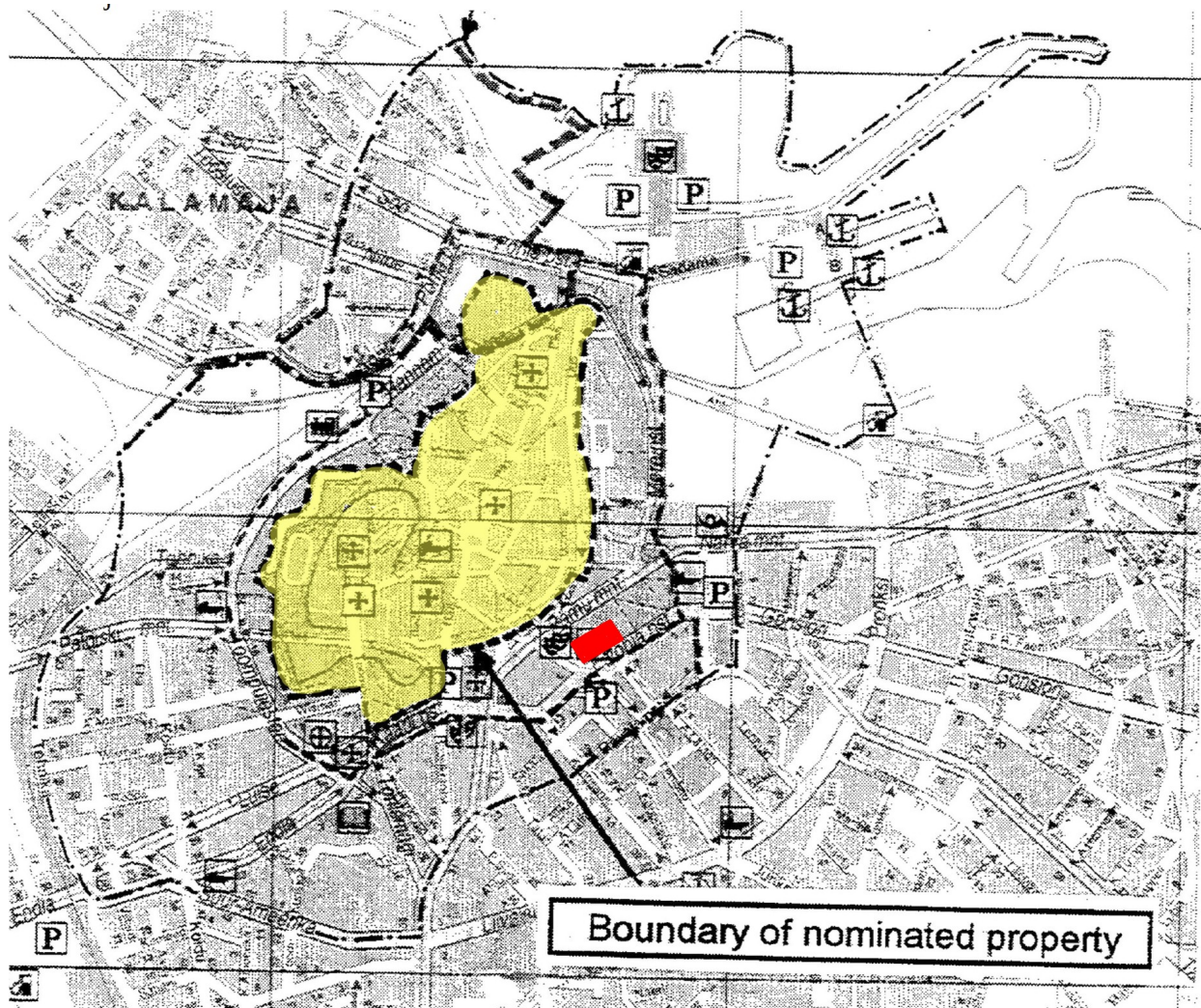
On the contrary, it is argued that the extension would, for instance, enable access to views of the Old Town from a rooftop terrace, expose fragments of bastions that lie underground (if any remain), and transform the area – currently nearly fully paved with concrete slabs and surrounded by container trees – into a truly attractive cultural hub in the city center.

Unfortunately, the impact assessment was compiled in violation of UNESCO’s own guidelines on impact assessment (section 6.2.1), which stipulate that the owners of the heritage object must be thoroughly involved in the process. Regrettably, the involvement of the Estonian National Opera and the Estonia Society (in a symbolic sense) in the impact assessment did not take place as required by the UNESCO guidelines.

The expert group engaged in the impact assessment was composed mainly of heritage conservation officials and historians. There is a conspicuous absence of notable architects, urbanists, and construction experts from the group. Although the author of the impact assessment begins the document by affirming his independence, confidence in this matter does not emerge, given the circumstances. The selection of experts is unilaterally centered around a single employer, and the objectivity of the impact assessment—as purportedly consulted by the working group designated by the Heritage Department—is highly questionable, since all non-official members of the expert group have previously publicly expressed opinions against the extension of the Estonia Theatre. Things must not only be correct; they must also appear to be correct! In this case, however, they are not.

Subchapter 1.1 – *“Since 1997, the Tallinn Old Town, within the boundaries of its heritage conservation area, has been included in the UNESCO World Heritage List. The building hosts the Estonian National Opera, Eesti Kontsert (the Estonian Concert Foundation), and the Estonian National Symphony Orchestra.”*

For some inexplicable reason, however, the map presented under this chapter is not that of the Tallinn Old Town’s heritage conservation area but rather the cultural heritage map of the Estonian Land Board, on which the location of the Estonia Theatre is marked with a yellow symbol. For the sake of accuracy—and as we might expect from such an assessment—it should be noted that the Estonia Theatre building was not included in UNESCO’s protected area in 1997, as can be seen from the diagram reproduced from the relevant UNESCO documents.



- Tallinna vanalinna UNESCO kaitseala 1997-2008
- Estonia teatri asukohta

Subchapter 1.2 – *“The solutions presented in the impact assessment are based on the need to avoid any negative impact on the heritage site’s outstanding universal value—or at least to reduce such negative impact to an acceptable level—and are intended to serve as input for the subsequent planning process.”*

Such vague, inconclusive rhetoric, which is not easily understood by the general reader, unfortunately pervades the entire impact assessment. Notably, it is the Tallinn Old Town that is listed as UNESCO World Heritage—not the whole of Tallinn. The impact assessment almost entirely treats the area of the Estonia Theatre as if it were part of the Old Town, which, by common understanding, it is not. A visual inspection reveals that one can hardly find any building in that area dating from before the 20th century. It should also be emphasized that the extension would not obstruct the view of the Tallinn Old Town, which is already not visible from the Estonia Theatre. In fact, there are many excellent examples of extensions of much older theatres worldwide that harmonize with their surroundings and enhance the urban environment.



View of an outstanding universal value



A panoramic view from the edge of Pärnu road, as seen from the Estonia Theatre toward the Old Town, would not change in the slightest due to the extension.



A panoramic view from the centre of the Uus market section in Tammsaare park, looking from the Estonia Theatre toward the Old Town.

Subchapter 2.1 – *“Since 1997, Tallinn has been included in the UNESCO World Heritage List. The prerequisite for inclusion is that the place demonstrates an outstanding universal value, meaning that the object belongs to the most prominent cultural heritage in the world.”*

For the sake of accuracy, it should be noted again that only the Tallinn Old Town, within specific boundaries, is included in the UNESCO Heritage List. Otherwise, one might ask why impact assessments are not conducted for massive buildings on Mustamäe or, for example, on Liivalaia Street – the latter, unlike the potential extension of the Estonia Theatre, would block some views of the Old Town. UNESCO’s website clearly explains what is being protected and what constitutes and expresses the outstanding universal value of the Tallinn Old Town.

<https://whc.unesco.org/en/list/822/>

In preparing the impact assessment, the analysis should have been based on the actual substance and aligned with the real existing situation, rather than merely relying on the extended boundaries drawn on a map in 2008. The area in question exists in reality, Tallinn’s development cannot come to a standstill, and residents cannot simply be relocated elsewhere. The designation of the paved plaza adjacent to the Estonia Theatre as an object of outstanding universal value attests either to a detachment from reality of the impact assessment or to the fact that the assessment was made solely on the basis of maps without on-site inspection.

Subchapter 3.1 – *“The Estonian National Opera wishes to acquire a new opera hall as an extension to its historic theatre building, so as to continue operating in its historic location while meeting modern needs.”*

The lack of an adequate opera hall is one of the most pressing issues in Estonian culture, and resolving this is not merely the wish of the Estonian National Opera. The matter of the extension has been discussed by the Parliament of the Republic of Estonia and the Parliamentary Culture Committee, fully aware of the current situation’s stifling impact on the development of Estonian culture, as well as on the professional scene in music and theatre, and ultimately on Estonia as a cultural nation. The construction proposals for other locations referenced in the impact assessment have, by now, been exhausted. For decades, there have been discussions on locations that would be suitable for an opera theatre–type representative building in Tallinn – such free spaces simply no longer exist. In addition, the Parliament has decided in favor of an extension rather than reconstruction or relocating the theatre to another site. Financial resources have also been allocated

for this purpose. Proposals to build elsewhere can be described only as a futile endeavor or a fantasy, for which neither the financial capacity nor the practicality exists – all to preserve a plaza covered with concrete slabs and surrounded by container trees that remains devoid of people.

Subchapter 3.2 Alternatives: *“Build the extension of the existing building at a significantly reduced scale”*

In the case of an extension (as opposed to a complete rebuild), almost the entire Estonia Theatre building, which is currently under heritage protection, would be preserved; the existing spaces would be retained, ensuring an environmentally sustainable and cost-effective solution in terms of materials and resources. Demolishing the current theatre building would disrupt the work of the Estonian National Opera for years and cause extremely significant harm to its audience and to Estonian culture in general. Considering the already difficult circumstances of the professional music and theatre sector in Estonia this would represent an additional major setback.

Subchapter 4.1.1 *“With the extension, the undeveloped buffer zone between the Old Town and the existing theatre building will disappear”*

This claim is misleading and fails to explain what the function of that buffer zone would be. The assertion gives the impression that the Old Town begins immediately at the boundary of the area on the side of the Pärnu road intended for the extension. However, that is far from the case: on the opposite side of Pärnu road there is nothing that actually indicates the presence of the Old Town. Moreover, it appears that at some point this is no longer considered part of the Old Town but rather something situated between the “existing theatre building” and the Old Town.

Subchapter 4.1.3 *“Loss of the integrity of the bastion zone”*

At the site of the Estonia Theatre building, the bastions are not visible at all. What does this supposed integrity mean? The extension would actually allow the bastions to be exposed and studied archaeologically.

Subchapter 4.1.5 *“Deterioration of the living environment associated with the loss of green space and the diminished attractiveness of the Old Town in the eyes of residents and visitors”*

The value of a so-called green space that was established a few years ago has clearly been overestimated. It is well known that people hardly visit this area. The new park has been partly occupied by antisocial elements. Therefore, any claim that this would reduce the attractiveness of the Old Town appears unfounded. On the contrary, an extension—as a cultural attraction center—would enhance its appeal to a far greater extent.

From Subchapter 4.2 onwards:

It is unfortunately difficult to comment on the impact assessment tables presented from Subchapter 4.2 onward, as it is unclear which criteria were used to arrive at one rating or another. Are these the subjective decisions of the impact assessment’s author or the conclusions of a collective process? The assessment evaluates the impact of the Estonia Theatre extension on UNESCO World Heritage in terms of preserving the outstanding universal value of the Tallinn Old Town. It should be noted once again that in 1997 the Tallinn Old Town was included in UNESCO’s protection under entirely different boundaries, which did not encompass the area between the Estonia Theatre and Pärnu road. UNESCO’s website provides documents that clearly explain what constitutes the outstanding universal value of the Tallinn Old Town; therefore, the frequently used rating of “severe negative impact” may be greatly exaggerated, as indicated by several heritage, architectural, and urban planning professionals.

When assessing various impacts, it should be taken into account that the size of Tallinn's Old Town, a UNESCO World Heritage site, has been 113 hectares since 2008. The footprint of the planned extension is only about 0.4 hectares. In the case of such a vast heritage site (113 ha), can the construction of an extension—of the same or lower height—on an existing building truly be considered to have a significant negative impact?

Finally, we must call attention to the irresponsible fear-mongering that has misled the Estonian public since the Estonian Parliament adopted the list of culturally significant constructions in 2021. One would expect that ICOMOS Estonia and the heritage experts would be aware of the precedents set by the removal of three objects from the UNESCO list. In that case, the public's fear of Tallinn Old Town being removed from UNESCO would not be a genuine concern but rather an attempt at manipulation. For instance, the Arabian Oryx Mosque, the Dresden Elbe Valley in Germany, and the Liverpool docks with their Victorian quays were removed from the UNESCO list because the protected objects ceased to exist and there was essentially nothing left to protect. In the case of the Estonia Theatre extension, nothing remotely similar would occur; the Old Town would remain in its current state, as would the conditions upon which Tallinn was included in the UNESCO World Heritage List in 1997.

Sincerely,

Estonian Academy of Music and Theatre, confirmed by the Senate on March 4, 2025

Estonian Music Council, confirmed by the Board on March 3, 2025

(digitally signed)