



NC ICOMOS, RUSSIA

**Межрегиональная общественная организация
«Национальный комитет
Международного совета по охране памятников и
достопримечательных мест (ИКОМОС)»**

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Mrs. Marie Laure Lavenir
Director General, ICOMOS

Mr. Toshiyuki Kono
Vice-President, ICOMOS
President, ICOMOS International Scientific Committee on
Legal Administrative and Financial Issues (ICLAFI)

Dear Mrs. Lavenir, Mr. Kono,

The Conference of the National Committee ICOMOS, Russia, with the present letter, would like to draw your attention to the situation regarding protection of the World Heritage Site #540 'Historic Centre of St. Petersburg and Related Groups of Monuments'.

At the moment, a number of facilities are being or planned to be constructed within the borders of the World Heritage site and its adjacent territories. These objects exert impact on the Outstanding Universal Value of the site, and the construction is carried out in disregard of the Paragraph 172 of Operational Guidelines for the Implementation of the Convention Concerning the Protection of the World Cultural and Natural Heritage of 1972 (hereinafter referred to as Operational Guidelines for the Implementation of the Convention of 1972).

First of all, it is the construction of the Lakhta-Centre skyscraper that distorts the protected panoramas of the historic centre and the adjacent components of the World Heritage Site. Dwelling houses are being constructed in the vicinity of the 18th century architectural monument, the Aleksandrino Country Estate (it is situated within the boundaries of the component #540-034g 'Peterhofskaya Road (Highway)'), which distorts the protected panorama of the country estate. The construction of a residential building is planned next door to the 18th century architectural monument, the Chesma Palace that is situated within the boundaries of the component #540-034a 'Moskovskaya road (highway)'. A construction permit had been issued and the construction activities of the Planetograd residential complex have commenced in direct proximity to the 19th century architectural monument, the Pulkovskaya Observatory (component #540-008); the construction of this complex simultaneously affects several components of the World Heritage site. The build-up of Duderhofskie Heights (#540-031a and 540-031c), the Neva River banks (#540-029) and the Izhorsky Bench (glint) (#540-030) is planned and carried out. Large-scale development projects lead to the distortion of the Palace and Park Ensemble of Mikhailovskaya Datcha ('Mikhailovka', #540-015), Koltushskaya and Yukkovskaya elevations (#540-032, 540-033). Ensembles of country houses in the environs of St. Petersburg are deteriorating (#540-009, 540-010, 540-011, 540-020d, 540-020f, 540-020g, 540-021, 540-022, 540-024). It is impossible to list all the objects and even less feasible to provide precise information about them as to the threat to the Outstanding Universal Value of the World Heritage site, so at this time we are only going to focus on the most grave violations.

In 1990, the World Heritage Site C 540 'Historic Centre of St. Petersburg and Related Groups of Monuments' was included in the World Heritage List by the decision of the 14th session of the UNESCO World Heritage Committee.

From the 30th session of the World Heritage Committee (2006) onwards, the Committee has nearly every year been drawing the attention of the Russian Federation to the urgency of developing the project for amending the borders of the World Heritage site and its buffer zones.

It was not until the 37th and 38th sessions of the Committee that the Russian Federation submitted for approval and the Committee approved the amended list and the reviewed borders of the site. However, up to now the Russian Federation has not brought the national protection status of its components and

elements into compliance with the international one and has not developed a project of borders and protection regimes of buffer zones for the site.

This letter is to turn the special attention of UNESCO to the problem of the Lakhta Centre skyscraper currently under construction that is a threat to the integrity of the World Heritage site 'Historic Centre of St. Petersburg and Related Groups of Monuments'. A new dominating structure has emerged within main city panoramas and panoramas of the palace and park complexes surrounding St. Petersburg. In its architecture and semantics, this dominating structure contradicts the historic landscape of St. Petersburg.

In 2012, as per decision of its 36th session, the World Heritage Committee suggested that the Russian Federation presents a detailed assessment of the impact of the construction project on the heritage before taking final decision about constructing the skyscraper. The assessment was to be carried out in accordance with the ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties. Some time before, this suggestion was advanced in a letter of the Director of the UNESCO World Heritage Centre Mr. Kishore Rao addressed to the Russian envoy to the UNESCO Mrs. Eleonora Mitrofanova (25.10.2011, Ref : WHC/74/4449/RU/AS/KR).

However, this suggestion had not been followed, and on August 17, 2012, the Government of St. Petersburg approved the construction project. In April 2013, having taken the current situation into consideration, the St. Petersburg Regional Branch of the National Committee ICOMOS, Russia (ICOMOS S-Pb) gave its assessment of the construction project.

According to this impact assessment that is available on the Internet (https://icomos-spb.ru/component/joomdoc/Lakhta%20Center%20Assessment_en.pdf/download) the overall impact of the Lakhta Centre sky-scraper on the outstanding universal value of the property on the World Heritage List can be characterized as predominantly *negative*. Such an important attribute of the site as its integrity will be harmed, because a new architectural dominant that has never existed before will emerge in its panoramas.

Results of the assessment, together with the supporting documentation were filed with the city authorities, as well as to the President of the Russian Federation. A run-around reply was sent by the chair of the office of a vice-governor of St. Petersburg, a low-level official.

In 2013, the findings of the assessment were presented at the International Scientific Committee on Historic Towns and Villages (CCIVVIH) of the ICOMOS in Budapest, where they were fully approved.

In the late 2015, the assessment was submitted to the World Heritage Centre, which has merely acknowledged the receipt of the letter and has taken no further measures.

Apartment blocks are built in the proximity to the territory of the Alexandrino Country Estate. The construction project of new residential buildings in the quarter 2A of Ulyanka neighbourhood does not comply with the provisions of Paragraph 172 of the Operational Guidelines for the Implementation of the Convention of 1972. The St. Petersburg Law no. 820-7 d/d January, 19, 2009, protects the panorama of the Alexandrino Country Estate and of the natural vertical drop in the surface pattern alongside the Prospect Stachek (Littorina terrace) which is supposed to be sufficiently modified by the project. Thus, the law is being violated.

The citizen' action group, with the support of deputies of the Legislative Assembly of St. Petersburg and the State Duma of the Russian Federation, has repeatedly challenged the construction permits in court and has already won about 20 litigations in defense of the Alexandrino Country Estate. However, the construction activities continue in spite of the positive courts' decisions, and the authorities of St. Petersburg issue new construction permits instead of those ruled illegal by the courts.

The provisions of Paragraph 172 of the Operational Guidelines for the Implementation of the Convention of 1972 are not observed in regard to the planned residential building at 7, Gastello Street, St. Petersburg, which is within the borders of the World Heritage site, in direct proximity to the Chesma Palace.

After the numerous addresses of the members of the civil society and of the ICOMOS Russian National Committee to the Government of St. Petersburg, not a single step to the revision of the project has been taken.

The Planetograd residential complex and some other projects expressly or by implication affect three components of the World Heritage site, namely #540-008, the Pulkovskaya Observatory, #540-030 Izhorsky Bench (glint) and #540-036a, the Memorial in Memory of the Defence of the City in 1941-1944 'The Green Belt of Glory of Leningrad', and are carried out in disregard of the compulsory provisions of Paragraph 172 of the Operational Guidelines for the Implementation of the Convention of 1972.

According to Paragraph 172 of the Operational Guidelines for the Implementation of the Convention of 1972, the World Heritage Committee urges the countries that are parties to the Convention of 1972 to inform the Committee via the Secretariat (the World Heritage Centre) about its intentions to

carry out or to authorise within the protected territory according to the Convention of 1972 any large-scale remedial works or new construction works that may affect the Outstanding Universal Value of the object. However, not a single time since 1990 have the authorities of St. Petersburg followed the provisions of Paragraph 172 of the Operational Guidelines for the Implementation of the Convention of 1972. Thus, a significant number of so-called 'urban-planning mistakes', i.e. new buildings affecting the Outstanding Universal Value of the object, have emerged within the territory of St. Petersburg and related components. As stated before, these 'mistakes' keep appearing.

The situation at hand was noticed by the President of the Russian Federation Vladimir V. Putin who issued the List of Instructions of the President of the Russian Federation on March, 31, 2016, #Pr-571, summarising results of the meeting of the President of the Presidential Council for Culture and Art. According to Paragraph 2b of the List, the President of the Russian Federation bound the Government of the Russian Federation and executive agencies to ensure observance of provisions of the Convention Concerning the Protection of World Cultural and Natural Heritage of 1972 and the Operational Guidelines for the Implementation of this Convention.

The Ministry of Culture of the Russian Federation, the Ministry of Foreign Affairs of the Russian Federation and the Commission of the Russian Federation for UNESCO endeavour to fulfill given instructions by obliging the executive agencies of St. Petersburg represented by the Governor of St. Petersburg Georgy Poltavchenko and his subordinates to observe the provisions of Paragraph 172 of the Operational Guidelines for the Implementation of the Convention of 1972, in particular concerning the development projects in the proximity to the Chesma Palace with Annexes and to the Aleksandrino Country Estate. However, the Government of St. Petersburg is insistently reluctant to abide by the provisions of the Convention of 1972 and the Operational Guidelines for its implementation.

In the light of all of the above, we kindly request you to:

- Draw the attention of the Russian Federation to the inadmissibility of the disregard of the provisions of Paragraph 172 of the Operational Guidelines for the Implementation of the Convention of 1972 in the context of the approval of the Lakhta-Center construction, as well as of the construction in the proximity to the Chesma Palace, the Aleksandrino Country Estate, the Pulkovskaya Observatory and other components and elements of the World Heritage site;
- Consider appointing a UNESCO and ICOMOS monitoring mission to the World Heritage Site #540 'Historic Centre of St. Petersburg and Related Groups of Monuments' for the purpose of checking the facts of the violation of the Outstanding Universal Value of the object;
- Organise a meeting in St. Petersburg with the involvement of ICOMOS international experts to discuss the alarming situation with the World Heritage site "Historic Centre of St. Petersburg and Related Groups of Monuments";
- Prepare a Heritage Alert for the St. Petersburg World Heritage site.

We look forward to hearing from you at your earliest convenience.

With kind regards,

Academician A.P. Kudryavtsev
President of NC ICOMOS, Russia



