

HERITAGE IMPACT ASSESSMENT REPORT

IMPACT OF THE LÄNSIRANTA SHOPPING CENTRE PROJECT ON OLD RAUMA'S WORLD HERITAGE VALUE



Aerial photographs of western Old Rauma and the commercial area from 1940 and 2019.

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11 May 2020

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1. Summary

Old Rauma, located on the west coast of Finland, was inscribed onto the UNESCO World Heritage list in 1991 as an excellent example of a northern European wooden town and urbanism. The World Heritage site of Old Rauma is carefully defined by the boundaries of the old wooden town. It is surrounded by an extensive buffer zone containing buildings of various sizes and ages. The land use plans and the land protection in Old Rauma and its buffer zone are based on national legislation.

A new shopping centre has been zoned within the buffer zone, very close to the boundary of the World Heritage site of Old Rauma. This Heritage Impact Assessment discusses the shopping centre and its impact on Old Rauma's Outstanding Universal Value (OUV), which was retrospectively adopted in 2014. The shopping centre's local detailed plan was approved on 30 October 2018, and a building permit was granted in January 2020.

The Heritage Impact Assessment commenced in spring 2019 and was conducted using guidelines issued by ICOMOS. The World Heritage site of Visby was used as a point of reference, as multiple Heritage Impact Assessments had been carried out for various projects in the area, and it provided examples of useful aspects to consider. The Heritage Impact Assessment was based on the materials used to prepare the shopping centre's local detailed plan as well as the component master plan concerning Old Rauma and its buffer zone. In addition, a commercial survey was commissioned to evaluate how the construction of new shopping centres have impacted similar-sized cities in Finland.

An assessment was made of two alternative scenarios. The first represented a hypothetical scenario where the assessment was conducted before the shopping centre project commenced, and the second represented a scenario where the local detailed plan had already been approved before the assessment and the building permit was granted during the assessment process.

The Outstanding Universal Value of Old Rauma concerns the actual World Heritage site of Old Rauma, and the buffer zone is only mentioned in the integrity section; there is no clear description of the buffer zone's significance or value. According to our interpretation, the green areas are an important element of the buffer zone, situated right next to Old Rauma, so the way the environment next to the Kanal is used in the project plays a part in preserving the area's OUV.

With regard to authenticity, only the functional value "Old Rauma has preserved its function as a residential area and commercial centre" could be compromised by the shopping centre project if the shops in Old Rauma are unable to compete with the new shopping centre. The nature of the project's impact (positive or negative) depends on various aspects that the project and the related operators cannot solely be held responsible for. Another process took place in Old Rauma even before the shopping centre project, with the aim of turning more remote commercial premises into residential premises. With regard to integrity values, the town's landscape will be affected by the shopping centre, as the building will have the largest gross floor area in the buffer zone.

In the hypothetical scenario wherein the Heritage Impact Assessment was conducted before or in conjunction with the drafting of the land use plan, the shopping centre project could not have been considered to compromise the OUV of Old Rauma in such a way that would cause the cancellation of the project. When conducted simultaneously with the local detailed plan work, the assessment could have explored different options related to the appearance and design of the shopping centre more extensively, as well as the changes the project would make to the surrounding urban structure. The current shopping centre project has some impact on the Outstanding Universal Value of Old Rauma, particularly on the ratio between residential and commercial premises and on the town landscape within the buffer zone. However, the shopping centre project has not compromised Old Rauma's World Heritage value. It is important to keep developing Old Rauma and its services while the shopping centre is being built.

2. Introduction

The city of Rauma is located in southwestern Finland and was founded in 1442. The city has a land area of 495 square kilometres and 626 square kilometres of water area. The city has a population of approx. 40,000 people. Rauma is part of the region of Satakunta, which has a total population of 223,000. The largest city in the region is Pori (85,000 inhabitants), which is 50 kilometres north of Rauma.

Rauma has quite a dense urban structure. Most of the services are situated within approx. 3 kilometres from the city centre. The city's Prisma and K-Citymarket hypermarkets are located near the city centre. The nearest modern shopping centres are approx. 50 kilometres away in Pori, where the largest shopping centre is Puuvilla. Puuvilla offers 41,500m² of rentable space, which is currently occupied by 70 companies.

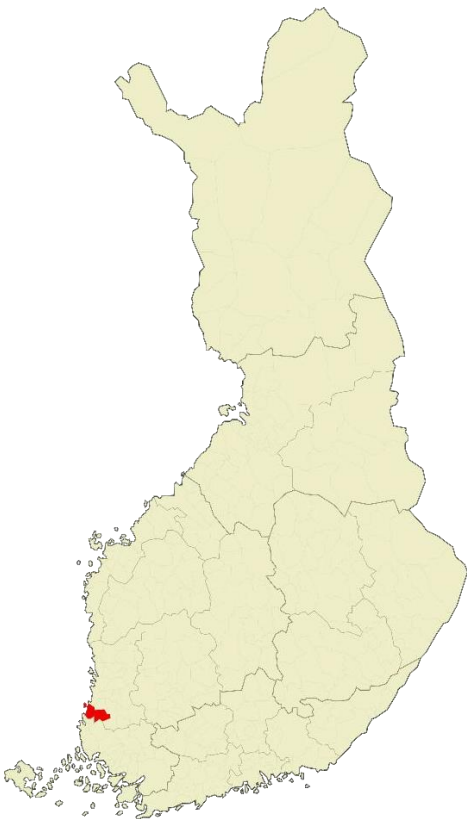


Image 1. Rauma's location in Finland

A planning reservation agreement¹ was made between the City of Rauma and Skanska Talonrakennus Oy in 2010, as well as an agreement concerning the upcoming amendment to Länsiranta's local detailed plan. A land use contract was made for the project together with the land use plan proposal.

Reference plans were drafted for the local detailed plan in the years 2012–2014. The local detailed plan's process 01-097 was approved on 23 November 2015 by the city council. Due to a formal error found in the decision-making process, the local detailed plan was referred back to preparation (01-100).

¹ A planning reservation agreement is a cooperation agreement between the city and a private entity. The planning reservation agreement concerning the area of Kanalin Länsiranta, the western bank of the canal, was made between the landowners of the area and approved by the city board. The planning reservation area covers land areas owned both by the city and the construction company Skanska.

The amendment to the local detailed plan 01-100 was approved on 31 October 2016 by the city council. Appeals about the local detailed plan were submitted to the administrative court, which overruled them on 24 November 2017. Appeals were then submitted to the Supreme Administrative Court of Finland, which overruled them on 30 October 2018, and the local detailed plan came into effect.

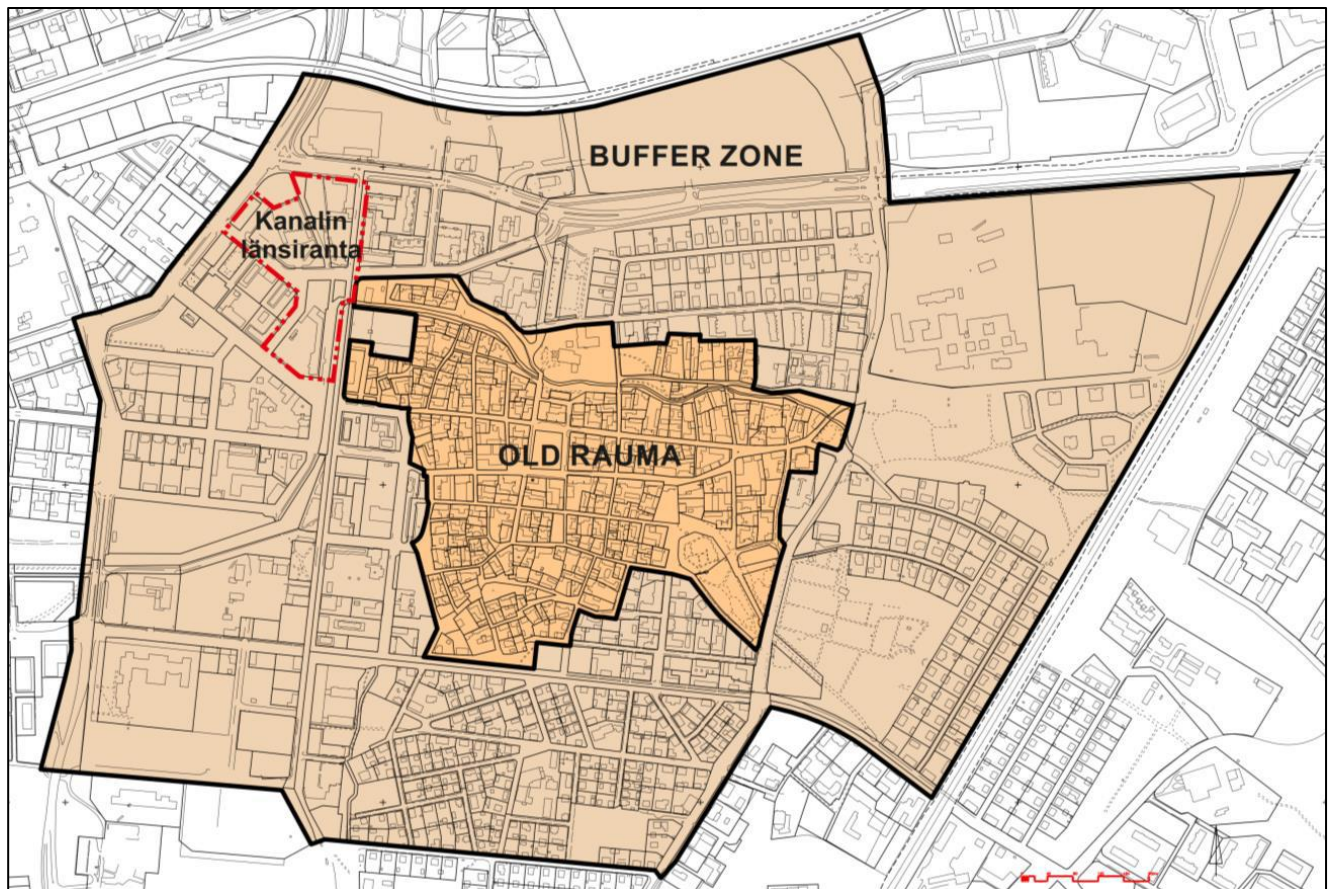


Image 2. The World Heritage site of Old Rauma, the buffer zone, and the land use plan area of Kanalin Länsiranta

The UNESCO World Heritage Centre approached the government of Finland on 8 December 2016 with a letter, asking Finnish authorities to comment on Old Rauma's shopping centre project and its impact on the site's Outstanding Universal Value. The Ministry of Education and Culture responded with a simple depiction of the situation.

The UNESCO World Heritage Centre replied to the ministry's letter on 15 March 2017. They asked for further information on the Kanalin Länsiranta shopping centre project, either from the project developer or from the municipality so that ICOMOS could perform an assessment. In addition, their letter stated that a Heritage Impact Assessment report might be requested at a later stage.

The Ministry of Education and Culture sent them a decision by the Administrative Court of Turku (24 November 2017) and a later decision by the Supreme Administrative Court (30 November 2018) which informed the World Heritage Centre that all appeals concerning the shopping centre project had been overruled. In return, the UNESCO World Heritage Centre sent the Finnish government a letter on 14 December 2018, requesting a Heritage Impact Assessment report on the Länsiranta shopping centre project. According to their letter, the HIA should follow the ICOMOS guidelines from 2011. The city board of Rauma decided on 4 February 2019 to draw up a Heritage Impact Assessment.

3. Old Rauma, a UNESCO World Heritage site

The convention concerning the Protection of the World Cultural and Natural Heritage was approved at the seventeenth session of the General Conference of the United Nations Educational, Scientific and Cultural Organization meeting in Paris in 1972, and it was ratified by Finland in 1987. The UNESCO World Heritage list is an integral part of the convention, with 1,121 sites listed in 2019.

The World Heritage Committee inscribed Old Rauma onto the UNESCO World Heritage list in 1991 as a unique example of a vibrant and well-preserved old Nordic wooden town. Rauma was the 582nd site listed on the World Heritage list. The World Heritage site of Old Rauma covers an area of 29 hectares and comprises some 600 buildings. There are approx. 800 residents living in the area.

Old Rauma's Outstanding Universal Value

To be accepted onto the World Heritage List, the nominated sites should be of Outstanding Universal Value. In addition, the sites should meet with at least one of the criteria for World Heritage sites.² There are six criteria (I-VI) for Cultural Heritage Sites. Old Rauma was accepted based on criteria IV and V.

According to criterion IV, *The town of Old Rauma constitutes one of the best preserved and most expansive examples of northern European architecture and urbanism.* According to the criterion V, *Old Rauma is an outstanding example of a Nordic city constructed in wood, and acts as a witness to the history of traditional settlements in northern Europe.*

In addition to the OUV and the criteria mentioned above, World Heritage sites should meet the requirements of integrity and authenticity. To meet the requirement of integrity, the site should be large enough and include all the necessary properties related to Outstanding Universal Value. The Nara Document on Authenticity, drafted in 1994, defines the site's authenticity as a culture-specific value. The World Heritage sites should also be properly protected and managed in order to ensure that the site continues to be preserved. The requirements Old Rauma must meet in order to fulfil the criteria of integrity and authenticity are defined in the retrospective³ Statement of Outstanding Universal Value, which was adopted in a World Heritage Committee session in 2014.

A synthesis of Old Rauma's Outstanding Universal Value:

"Situated on the Gulf of Bothnia, Rauma is one of few medieval towns in Finland. The core of the town is Old Rauma, which is composed of some 600 buildings constructed of wood, most of which are privately owned. Old Rauma covers an area of 29 ha. Originally situated at the seashore, the Old Town is located some 1.5 km inland from the present coastline due to land uplift. Old Rauma is both a commercial and a residential area comprising the town area within the toll boundaries of Rauma in the 19th century. The town plan structure of Rauma has been maintained since the medieval period, including the irregular street network, city blocks, plots of land and courtyards.

The buildings are mainly one storey tall, and date back to between the 18th and 19th centuries, while some cellars remain from earlier houses. The residential houses are placed along the street, and outbuildings such as former animal sheds and granaries are built around narrow courtyards."

² IV: The site is an outstanding example of a type of building, architectural ensemble or cultural landscape. V: The site is an outstanding example of a traditional human settlement typical to at least one culture; land-use, or sea-use; or human interaction with the environment.

³ Retrospective refers to the review of things that have already happened. At the time when Old Rauma was named as a World Heritage site, contemporary Outstanding Universal Value statements were not required.



Image 3. Kuninkaankatu street in summer. Central Old Rauma is partly closed to vehicle traffic in summer.

“The present appearance of the buildings is a result of phases of gradual changes and enlargements between the 18th and the late 19th centuries. At the end of this period, the increased wealth of the town due to ship trading resulted in the extension and modernisation of residential buildings. This can be seen as decorative exterior panels with Neo-Renaissance details, and the characteristic, highly decorative gates of the courtyards.”

“The commercial area is located along two main streets stretching through the Old Town, while the Market Square, in the middle of the Old Town, forms the main meeting point and commercial place for local people and producers. The medieval church, built around a Franciscan monastery, and the former Town Hall built in 1775-76 in the Market Square are landmarks in the harmonious townscape of one-storey residential and commercial buildings. The architecturally homogenous urban area of Old Rauma is a well preserved and representative example of traditional Nordic wooden town building techniques and traditions.”

Every World Heritage site should have a defined *buffer zone*. The purpose of the buffer zone is to safeguard the site’s Outstanding Universal Value. Old Rauma’s buffer zone was defined in the city centre’s component master plan that was approved on 25 August 2003 by the city council as well as by the UNESCO World Heritage Committee in June 2009. The buffer zone that includes the core of the city centre covers an area of 142 hectares and reaches a distance of between 150 and 850 metres from the boundary lines of Old Rauma. The buffer zone is a part of Rauma’s city centre and central zone. There are various different functionalities in the buffer zone: areas of detached houses, apartment blocks and large retail units, among others.

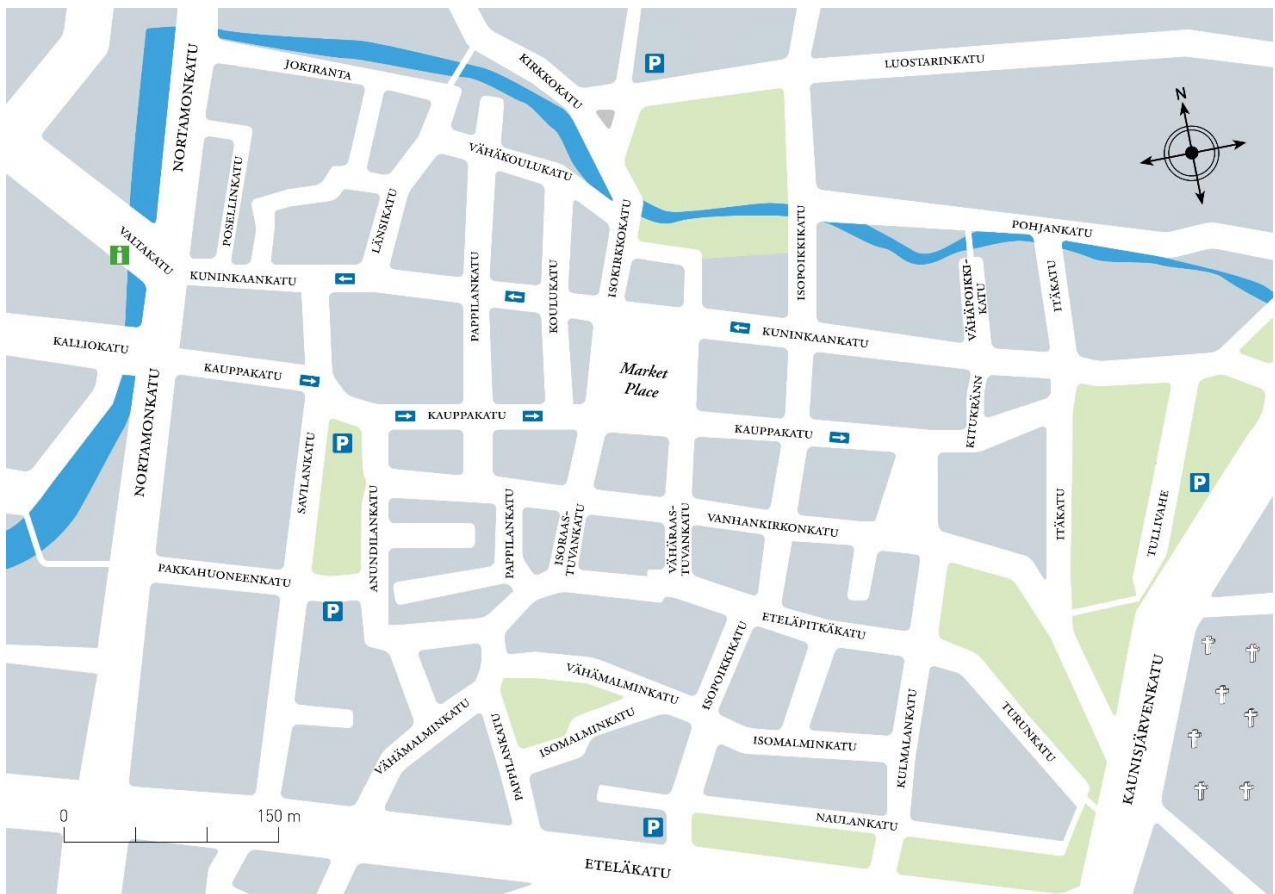


Image 4. Tourist map of Old Rauma.



Image 5. Rauma's market square in summer.

The land use planning in Old Rauma

The land use plans and the land protection in Old Rauma are based on national legislation.

The most important laws are the Land Use and Building Act (132/1999), the Land Use and Building Decree (895/1999) that specified the Act's regulations even further, the Act on the Protection of Built Heritage (498/2020, no English translation available), the Antiquities Act (295/1963, no English translation available) and the Church Act (1054/1993, no English translation available).

The local detailed plans are the primary tool for protecting the built environment. The Act on the Protection of Built Heritage is used especially when the site is nationally significant, its preservation and protection cannot be ensured with land use and building laws and their regulations (for example, land use protection cannot be targeted to indoor spaces), or if there are particular reasons for the protection pursuant to the Act on the Protection of Built Heritage due to the land use plan situation.

Verla, one of Finland's World Heritage sites, is protected by the Act on the Protection of Built Heritage (previously the Act on the Protection of Buildings), and the area's component master plan acts as complementary protection. A decision was given recently by the Centre for Economic Development, Transport and the Environment regarding the protection of Suomenlinna's buildings (pending confirmation of the decision by the Ministry of the Environment). In addition, Suomenlinna is a protected area by default due to its status as an archaeological site. Suomenlinna's local detailed plan is currently pending. The Petäjävesi Old Church is automatically protected by the Church Act.

The Finnish land use planning system is a three-tier system wherein the master plan directs the more detailed plans. Regional plans are the most generic but the most fine-scaled land use plans. The regional council is responsible for drafting regional plans, so in the region of Satakunta the responsibility lies with the Regional Council of Satakunta. The regional plan has been approved by Satakunta's Regional Assembly and ratified by the Ministry of the Environment.

The local master plan is more specific than the regional plan, but it is also a general land use plan. It is drafted by the municipality, in this case the City of Rauma. In addition, the local master plan can be drawn up based on just one part of the municipality's area, in which case the plan is called a component master plan. The master plan is approved by the municipal council. The local detailed plan is the most specific plan in the land use system. It is drafted by the municipality and approved by the municipal council. The land use planning is directed by the Land Use and Building Act, and by building ordinance in the case of municipal plans.

In the regional plan (2011), Old Rauma has been marked as an area of central functions, as a UNESCO World Heritage site (un), and as a nationally significant built cultural environment. The Ruins of the Church of the Holy Trinity have been marked as a protected area pursuant to the Antiquities Act. The inhabited centre of Rauma and the broader environment have been proven to be significant target zones for cultural environment and landscape tourism. According to the protection regulation concerning Old Rauma, *"The site must be managed in a way that preserves its value as a World Heritage site. The Finnish Heritage Agency must have the opportunity to issue a statement regarding all building plans and projects in the area."* Old Rauma and the buffer zone's Onnela and Nummi residential areas are also defined as *nationally significant built environments* (RKY 2009).⁴

⁴ RKY (Built Cultural Environments) is an inventory of built cultural environments and their national land use guidelines, prepared by the Finnish Heritage Agency and entered into force with the decision of the Finnish government in 2009. The

In the regional plan, the kh marking indicates the nationally significant built cultural environments, and the kh2 marking indicates regionally significant cultural environments.

The kh and kh2 markings have the following meaning as planning regulations:

“The region’s entity, specific characteristics and features must be taken into consideration in the more detailed planning of the area in a way that the preservation and development of their value is promoted. This includes open farming areas. The Finnish Heritage Agency must have an opportunity to review all plans or projects concerning the area or site that will affect the current circumstances in that area in a substantial way. When planning the site and its immediate surroundings, values relating to culture, the landscape, nature and the environment must be taken into consideration, and it shall be ensured that no action or project will compromise or weaken the preservation of those values.”

The SV-3 marking signifies the buffer zone of the UNESCO World Heritage site. According to the planning order, the buffer zone must be maintained in a way that ensures its values as a World Heritage site are preserved. The Finnish Heritage Agency must have an opportunity to issue a statement regarding all building plans and projects in the area.

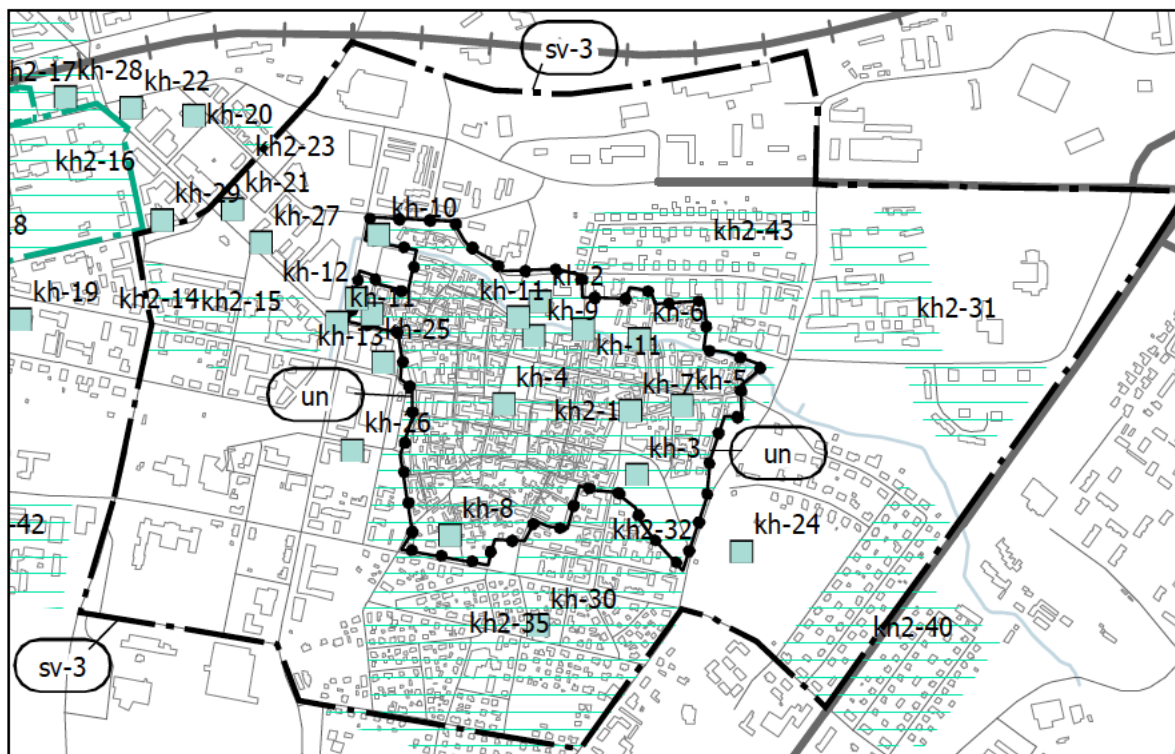


Image 6. Old Rauma (un) and its buffer zone (sv-3) outlined on a regional plan of Satakunta.

The city centre’s component master plan from 2003 was still in force at the time when the local detailed plan for Kanalin Länsiranta was approved. The city centre’s component master plan has since been revised and the new plan entered into force in 2018.

The fundamental choice behind Rauma city centre’s component master plan from 2003 was to densify the urban structure. Different functionalities – such as living, commercial, administrative, cultural and tourism services – are located within walking distance from each other. The central

sites chosen in the national inventory provide a diverse overall picture of Finland’s built environment, and its history and development, regionally, temporally and by site types. (The Finnish Heritage Agency 2009. Nationally significant built environments. Available in Finnish at www.rky.fi)

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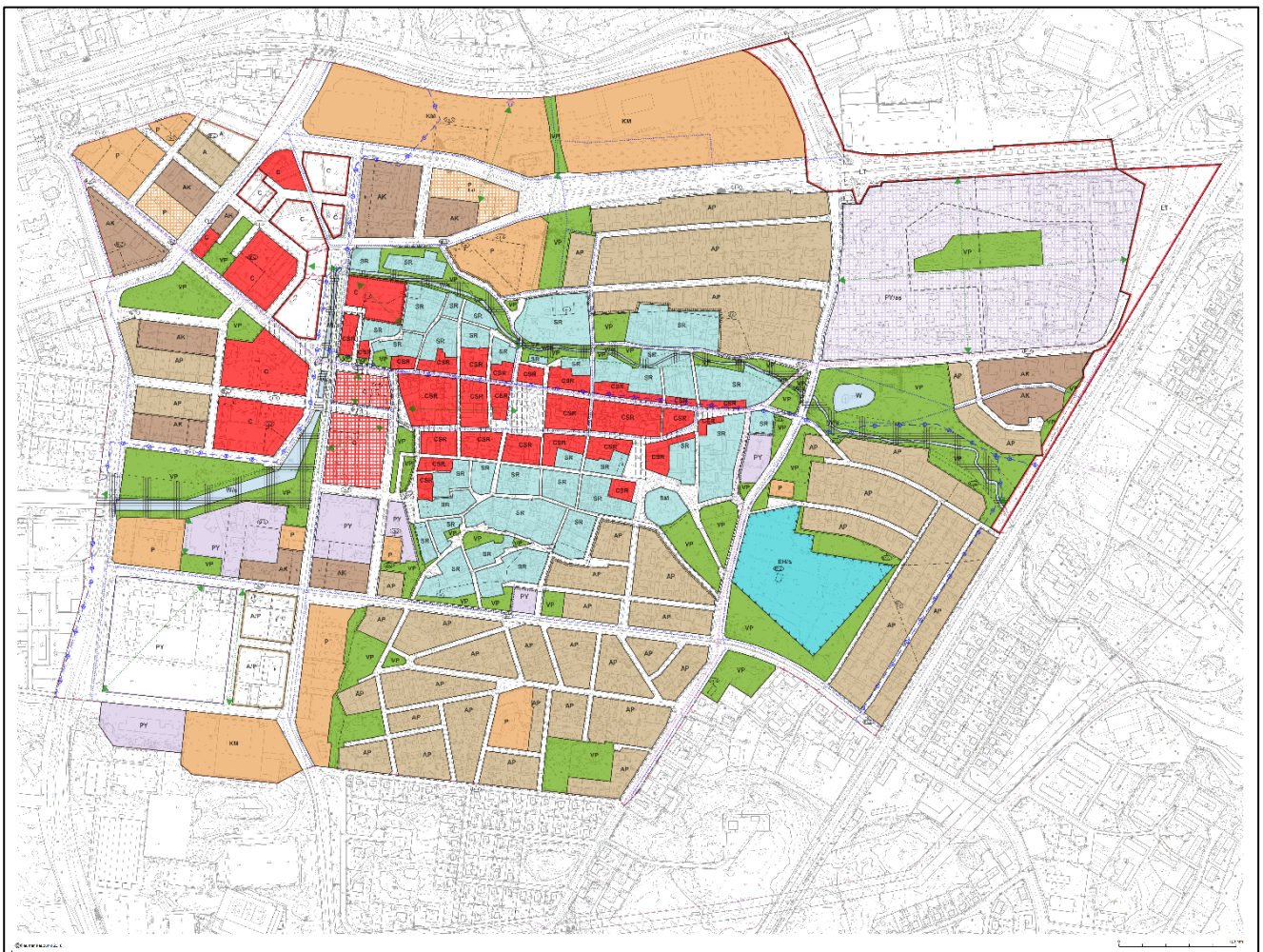


Image 8. The current component master plan of the city centre.

Old Rauma has been marked as a protected area pursuant to Finnish building legislation as well as a UNESCO World Heritage site in **the master plan 2030** (approved in 2019) and in **the city centre's component master plan** (approved in 2018). Old Rauma's areas are protected either with a CSR or SR marking in the city centre's component master plan. The land use plan covers the entire Old Rauma World Heritage site area and its buffer zone.

The local detailed plan regulates the protection of Old Rauma in detail. The local detailed plan, ratified in 1981, is still in force to a large extent in Old Rauma. The land use plan concerning Pohjankatu street on the northeast side of Old Rauma was ratified in 1983. A few plan amendments regarding one or two plots have since been made, 11 in total. The latest amendment that enabled the building of market stalls was ratified in 2006. There are 40 different local detailed plans in force in the Old Rauma buffer zone. The current local detailed plan of Old Rauma is outdated, so a new plan is pending. Since the detailed plan is currently under revision, a building prohibition is in force that covers all of Old Rauma.⁵ This means that all projects that require a building permit must apply for exceptional planning permission. The local master plans direct the new local detailed plan.

⁵ The prohibition of construction in the Old Rauma area due to upcoming amendments to the local detailed plan entered into force on 13 July 2016. The building prohibition is restricted to new builds, demolition of buildings or their parts, building extensions, anything more than minor changes to the appearance of a building, and changes in the purpose of a building. While the building prohibition is in force, such projects must apply for exceptional planning permission. Regarding these projects, contact must be made early on with the architect who prepares exceptional planning permission. The application for exceptional planning permission is submitted to building supervision authorities. Statements regarding the application will be requested from the Finnish Heritage Agency and the Centre for Economic Development, Transport and the Environment. Exceptional planning permission is decided by the Planning and Land Use Division of the City Board of Rauma.

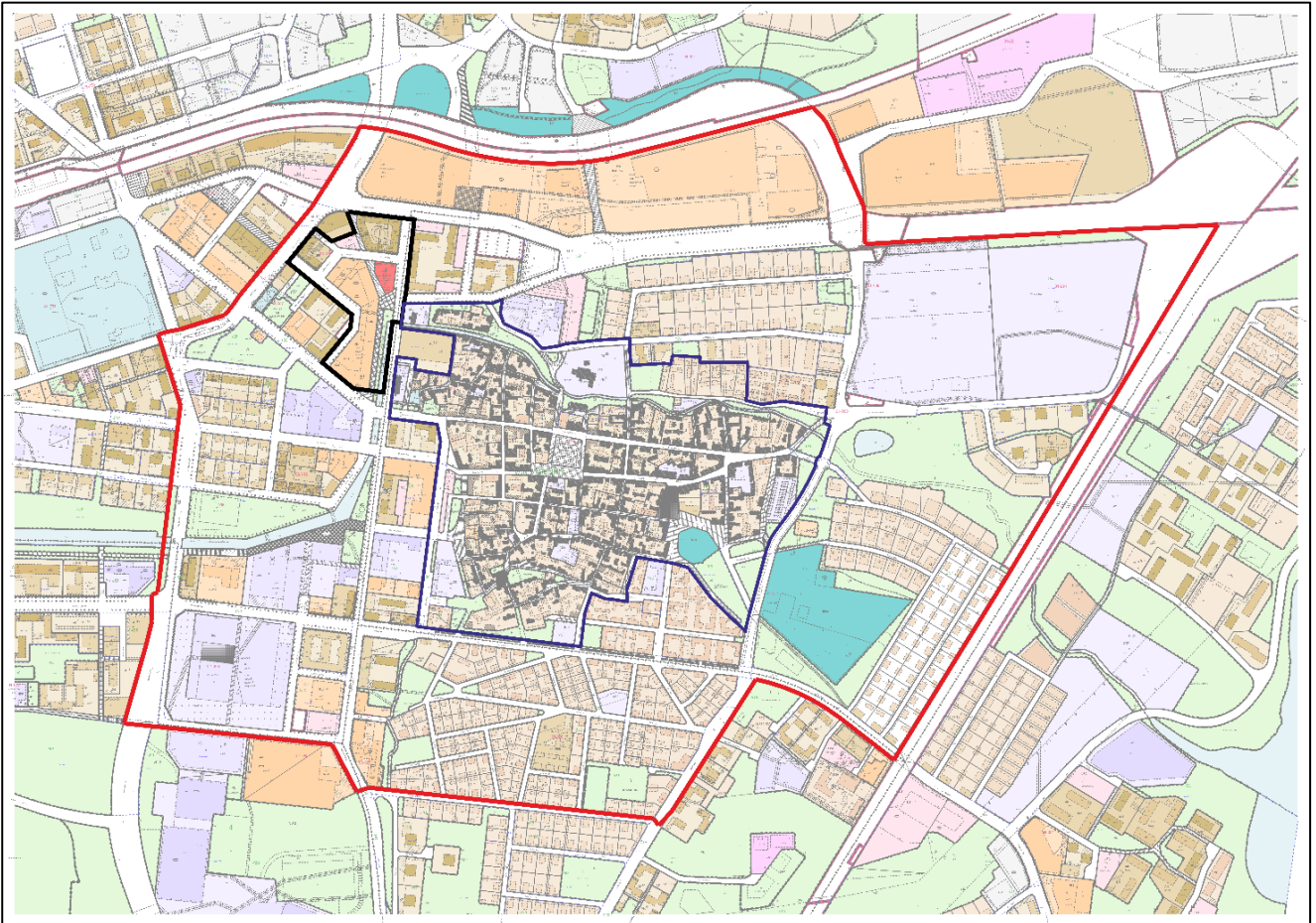


Image 9. The Old Rauma buffer zone (in red) and its local detailed plan (in blue), as well as the local detailed plan for Kanalin Länsiranta (in black) on the map.

Since 1982, the implementation of Old Rauma's local detailed plan has been supervised by a **specific Old Rauma steering group** which is appointed by the City Board of Rauma. This steering group does not usually handle any matters related to the buffer zone, except in the case of this shopping centre project (due to a regulation in the local detailed plan). The Old Rauma committee includes representatives appointed by the city administration, as well as several experts. The Finnish Heritage Agency has appointed a representative to the committee, and thus, a statement about the building project does not have to be requested from the Finnish Heritage Agency pursuant to the special regulation in the local detailed plan.

The **building ordinance** of the City of Rauma entered into force on 3 April 2009. It is divided into construction procedures and geographical aspects. The regulations of the building ordinance must be complied with, unless otherwise stated in the Finnish Building Code or in legally binding master plan or local detailed plan.

Archaeology and ancient relics

The archaeological strata of our oldest towns in Finland are protected. The Antiquities Act concerns primarily those towns that were founded before the 1700s, and their cultural strata that are located in the areas that were built before The Great Wrath⁶ (1713–1721) and have been preserved from the time the town was founded to the 1800s. The sites listed in the ancient relics register are Rauma's former town church, the Church of the Holy Cross (church of the Rauma Franciscan Friary) and Old Rauma.

The Finnish Heritage Agency drafted an inventory of urban archaeology for the City of Rauma in 1983 as part of the Medieval Towns project. The inventory was supplemented further in 2012. Rauma's only remaining medieval buildings, the Church of the Holy Cross and the Ruins of the Church of the Holy Trinity are also categorised as ancient relics.

The city's oldest strata are included in the World Heritage site's cultural environment, and they are an important source of information that can be studied with archaeological excavations. Digging is subject to authorisation in Old Rauma, and the Finnish Heritage Agency must be contacted early on in the planning stage regarding all land use plans. There have not been any discoveries of ancient relics at the location of the shopping centre, and there are no indications of ancient relics in the local detailed plan.

Old Rauma site management plan

The site management plan for Old Rauma has set many objectives for the buffer zone. *“Old Rauma is taken into account in every significant land use project in the buffer zone, pursuant to the land use plan's symbols. In order to secure Old Rauma's vitality, the different functions must be well-balanced both in Old Rauma and outside the area's perimeter. The city and its entrepreneurs are monitoring changes in business life and setting limit values for acceptable levels of change, for example the minimum number of businesses in Old Rauma.” “Ideally, the buffer zone's functions will complement Old Rauma's services. The city has the responsibility to make accessibility between the buffer zone's commercial functions and Old Rauma smooth and functional.”*

⁶ The Great Wrath was a Russian military occupation of Finland that took place between 1713 and 1721, during the Great Northern War (1700–1721).

4. The amendment to the local detailed plan for Kanalin Länsiranta

The amendment to the local detailed plan for Kanalin Länsiranta (AK 01-100) enables the building of two-storey shopping centre, with the possibility of attaching a bus station and a platform area. The shopping centre's car park is placed on the building's roof level. Commercial, office, residential or service premises can be placed in the quarter next to the shopping centre (CKP). The land use plan enables the building of seven blocks of apartments in the northern city blocks of the area. These blocks of apartments would have 5, 6 or 7 floors. Parking for these apartment blocks is located half a level beneath the buildings. A hotel can also be established into one of the residential city blocks. The land use plan has separate regulations concerning the type of construction that must be followed pursuant to land use plan regulations. The amendment to the land use plan assigns building rights for 58,990 floor square metres in total. Up to 27,885 floor square metres of the whole land use plan's area can be used for commercial premises.

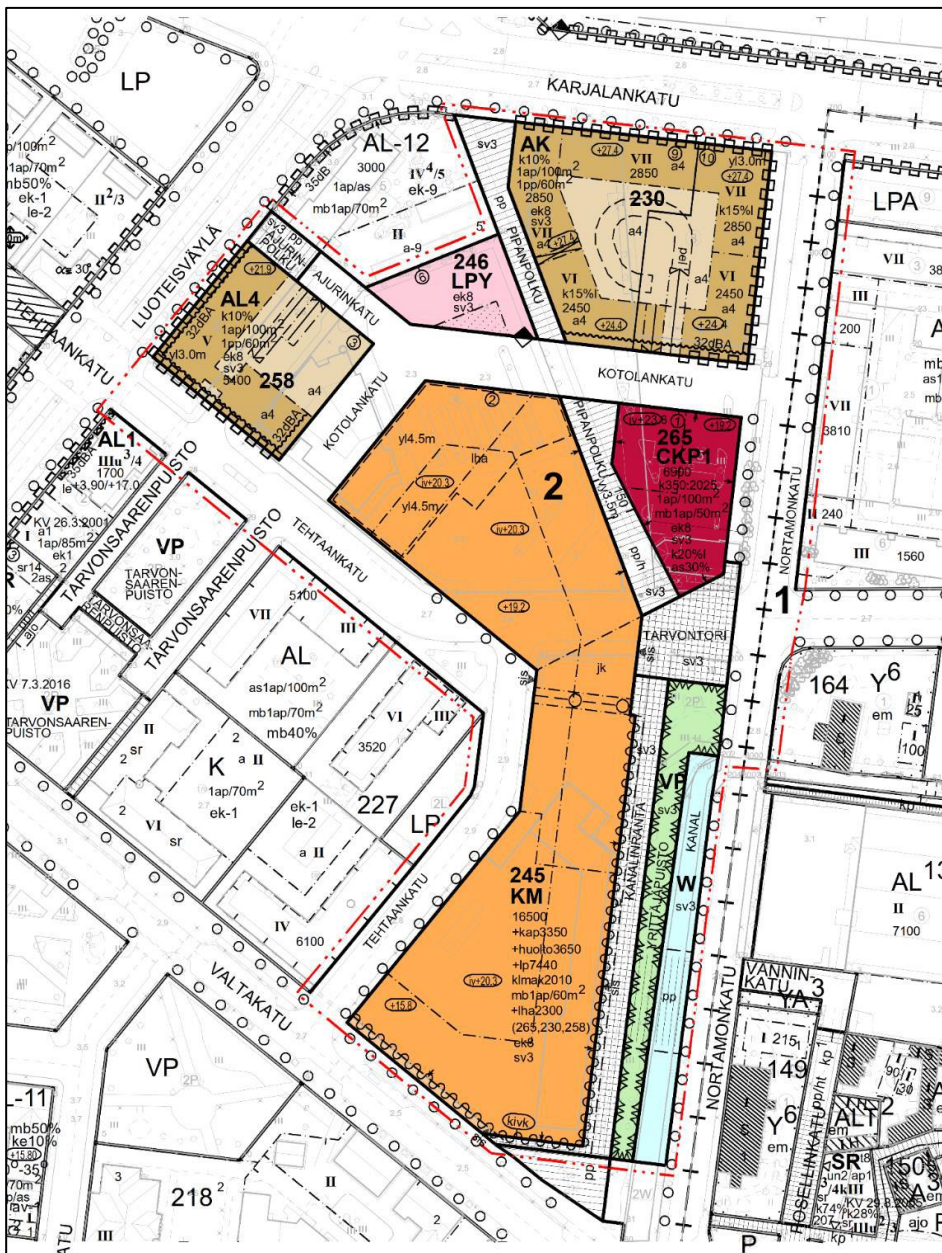


Image 10. Kanalin Länsiranta's local detailed plan. The shopping centre and the bus station are marked in orange.

Current status of the land use plan area

The buildings in the plan area's environment are of various ages and sizes. The area has been a part of organised urban structure since the end of the 1800s. The planning area is located in the World Heritage site's buffer zone. The buildings in the area have versatile purposes of use. There are residential buildings, commercial premises, supermarkets and public buildings.

The following buildings are located in the plan area:

- Bus station, 1963
- Tarvontori shopping centre, 1973
- Sokos department store, 1983
- Hesburger restaurant, 1994

The bus station was demolished in November 2019 and Tarvontori shopping centre will be taken down in 2020 to make way for the new shopping centre. The amendment to the local detailed plan of Kanalin Länsiranta will enable the demolition of the Sokos department store and Hesburger restaurant to make way for the CKP and residential quarters.

Here are some excerpts from the description dated 24 August 2016 concerning the shopping centre's local detailed plan:

"The city centre of Rauma needs a shopping centre in order to densify the city centre's quarters and tie the specialty stores of Old Rauma and Valtakatu street together with the market area. A shopping centre situated in the city centre would offer international and national chains desirable premises that are close to each other. Typical chain stores can usually be found in shopping centres while independent entrepreneurs choose to stay away from the shopping centres. This setting fits Rauma's intentions as well, because then Old Rauma's appeal would remain the same and its commercial structure would not be significantly altered."

"Because of this, it should be taken into account when choosing companies for the shopping centre that interior design shops, for instance, should not be heavily encouraged to seek premises in the new shopping centre. There is an attractive concentration of such stores in Old Rauma, and they should be cherished. The shopping centre will primarily house chain stores such as fashion, sports, electronics and other special stores and cafe and restaurant businesses that typically seek premises in city centres. In addition, entertainment services, such as a cinema, bowling alley and fitness centre, can be placed in a section of the shopping centre. In the shopping centre, chain stores will need premises of approximately 500 to 1,000m² that can be divided onto two levels. The premises must be large enough to allow chain concepts. In addition, there should be enough space reserved for a convenience store (2,000m²). Other commercial premises will be smaller and placed on the street level."

"The purpose of Kanalin Länsiranta's amended local detailed plan is to enable the formation of an urban and functionally versatile city centre, which will have a cohesive city landscape that will complement the current urban landscape. The new buildings and the street construction must be designed and constructed as high-quality examples of the architecture of our time. High levels of skill are required from the designer and the builder in the planning stage of construction. The area is located in the immediate vicinity of the World Heritage site of Old Rauma and its buffer zone, which must be taken into consideration in all planning regarding the area."

"The plan's impacts on the Old Rauma World Heritage site are complex and partly difficult to foresee. The impacts can be functional and relate to the city landscape. The objective is to create a cohesive

city landscape that complements the current urban landscape and gathers its functions together so that it will clearly stand out from its environment as modern architecture of a new era. The plan area's buildings are significantly larger in scale than the buildings of Old Rauma. The area's buildings will clearly indicate the transition from Old Rauma to new city centre. This new shopping centre will be the most important interface with Old Rauma in the plan area. High-quality construction planning that carefully considers the design, planning and characteristics of the location plays a significant role in considering how new buildings fit into the UNESCO World Heritage site's buffer zone, and in cherishing Old Rauma's special position in regard to cultural heritage and the city landscape. The local detailed plan alone cannot guarantee a successful outcome in regard to city landscape."

The shopping centre project

The shopping centre will be located in an area which has 33,240m² of building rights assigned in the local detailed plan. Of this amount, commercial premises cover 16,500m², the hallway, lobby and staircase premises 3,350m², technical facilities for maintenance 3,650m², parking facilities 7,440m², and bus station terminal and platform areas 2,300m². According to the plan regulation, the maximum space allowed for all commercial premises under 200m² in total is 2,010m². The building height has been regulated in the land use plan by defining the elevation of the building roof's highest point. In the southern section of the building, the height is +15.8m, whereas elsewhere it is +19.2m. In addition, in some sections of the covered area the ventilation rooms are allowed a maximum elevation of +20.3m. The building's volume will be 132,000m³. The Tarvontori shopping centre that will be demolished from the plot has the height of approx. +10m and a volume of 36,000m³.

According to the building permit application's drawings, the shopping centre will have 21 shops and 7 restaurants on the 1st floor, and 22 shops and 2 office premises on the 2nd floor.

Corten steel sheets will primarily be used for the building's façade. Glass will mainly be used in the joint section between Tarvontori square and Tehtaankatu street, and at the street level facing Valtakatu street and the canal. The height of the first floor's southern and eastern shopping windows will be approximately 2 metres. Brown-toned steel sheets, wire mesh and cement bonded fibreboards will be used as complementary façade materials. The external walls of the bus station will have light-coloured cement bonded fibreboards. The project's Principal designer is architect Pekka Mäki from Sigge Arkkitechdit Oy.

5. Heritage Impact Assessment – method and application

We have applied ICOMOS's HIA guidelines to our assessment work. The City of Rauma compiled all the materials related to this project (the index can be found at the end of this report) for our use. To begin, we visited Rauma to see the location and the project's materials. In addition, the person who conducted the surveys presented the commercial surveys to us. At the end of the presentation, we agreed that one more commercial survey should be conducted: how the building of shopping centres in city centres affected similar-sized cities, their shops, and the number of available commercial premises.

We began this Heritage Impact Assessment by discussing the thoughts raised by the project materials. Because the assessed site, i.e., the shopping centre project, will be located in the buffer zone, it was important to us to familiarise ourselves with the significance of the buffer zone. At first, it was our objective to identify and concretise the Outstanding Universal Value of Old Rauma as outlined in the OUV document. We then gathered the objectives of the buffer zone from its land use plans. Both the Outstanding Universal Value and the buffer zone's objectives are described in the documents in a very broad manner. After recognising the OUV of the site, it was our aim to define the shopping centre project's impacts on that value (positive and negative), and to think of ways to reduce the negative impacts.

Visby had already been chosen as the benchmark and reference site at invitation to tender stage of the project; Heritage Impact Assessment had just been completed there in regard to multiple projects. We visited Visby and heard the Swedes' experiences and views of their projects and the subsequent impacts, which we found very useful. A Heritage Impact Assessment was carried out in Visby, because they wanted to test the assessment's effect. They were satisfied with the results.

Because the local detailed plan of the Länsiranta shopping centre had been ratified before the Heritage Impact Assessment was completed, we were unable to try to influence the content of the plan based on our observations. We were given the chance to discuss the project with the people who were designing the building and tell them about the observations that were made during the Heritage Impact Assessment work, which might have had a positive impact on the development of the designs.

The focus of this assessment is a shopping centre that will be located in Kanalin Länsiranta (the area around the west bank of the canal), right next to Old Rauma. Its local detailed plan was ratified in 2018. The same local detailed plan enables the building of high residential buildings (with 6 or 7 floors, which is high compared to Rauma's other buildings) north-east and north of the shopping centre. The assessment of these building projects is not included in this Heritage Impact Assessment report, because the scope of this assessment was limited to the shopping centre project in a meeting between the City of Rauma and The Finnish Heritage Agency held on 18 January 2019.

Pursuant to ICOMOS guidelines for Heritage Impact Assessments, the assessment should be carried out when the land use plan is being prepared, and the assessment should be attached to the plan when it is finished. The work should be carried out so that the possible negative impacts are recognised during the Heritage Impact Assessment as early on in the plan's preparation process as possible, and that preventative measures can be taken instead of reacting to the impacts afterwards.⁷

⁷ Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, ICOMOS 2011, section 2-1-7, 2-2-2

During the Heritage Impact Assessment work, the assessors had the opportunity to present their observations to the designer when the shopping centre building and its architectural appearance were being designed. However, this report will present some things that, in hindsight, should have been taken into consideration when the land use plan was being drafted. Our purpose is to show that carrying out a Heritage Impact Assessment simultaneously and interactively with the preparation of the land use plan is truly useful, and we recommend that assessments are simultaneously carried out for any future significant projects concerning Old Rauma or its buffer zone.

It was found in Visby that it is most productive to carry out Heritage Impact Assessment in the drafting stage of the land use plan, because then the observed negative impacts can be addressed, or the project can be abandoned if it is found to overly compromise the Outstanding Universal Value. We recommend that a cultural heritage impact assessment of some sort should also be carried out when an application for a building permit is submitted. We will also recommend this to the City of Rauma.

This Heritage Impact Assessment can affect the project only by providing guidelines for the architectural and functional solutions of the shopping centre, and by providing guidelines for the design of the shopping centre's environment.

The project will be located in the buffer zone, but it will be very close to the boundary of the Old Rauma World Heritage site. Impacts should therefore be assessed in relation to the buffer zone and Old Rauma. When assessing the shopping centre project's impact on Old Rauma's Outstanding Universal Value, it is also partly an assessment of Old Rauma's adaptability. It is an assessment of how Old Rauma will be able to adjust to the change to the buffer zone and how it can respond to the competition between commercial operators, for example. The city has a significant role to play, because it can influence Old Rauma's development to some extent. For instance, signposting and services in the Old Rauma area can be systematically improved.

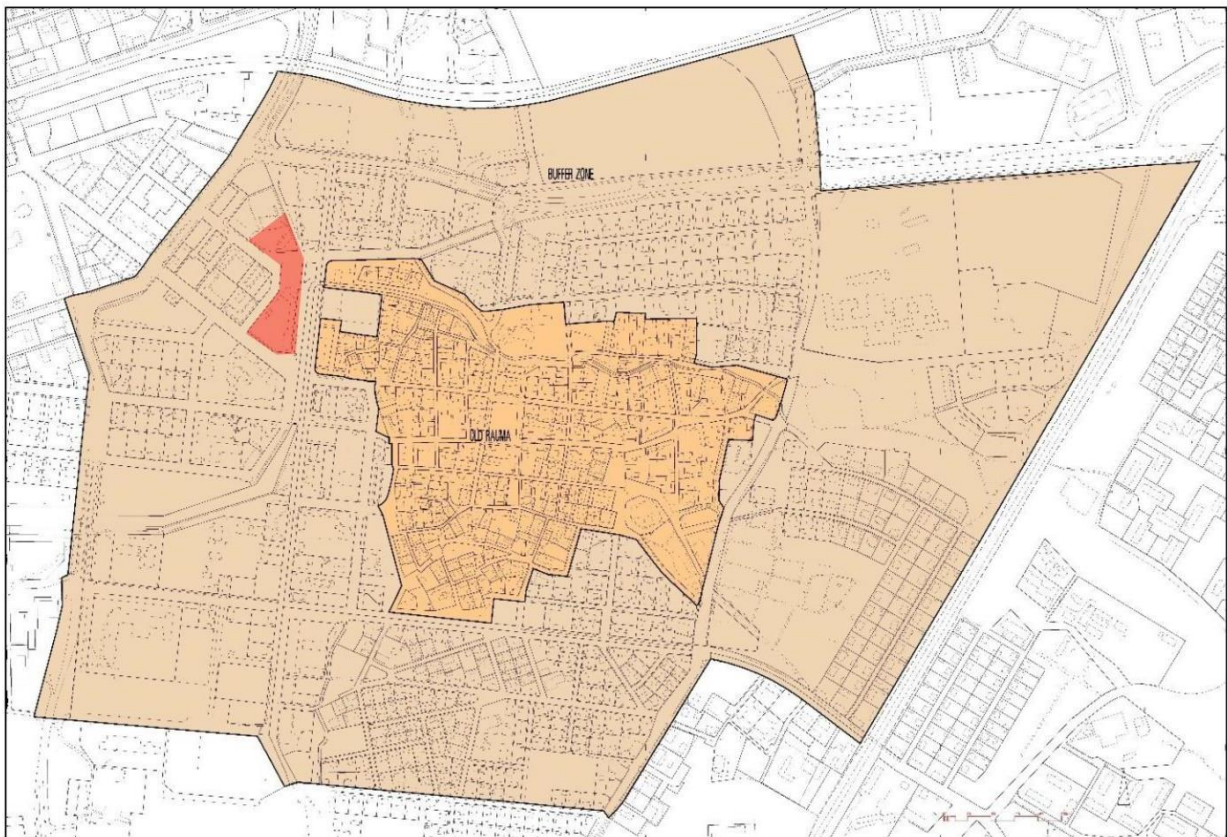


Image 11. Old Rauma World Heritage site boundaries and buffer zone. The shopping centre's location is marked in red.

6. HIA for the Länsiranta shopping centre, premise

Old Rauma's Outstanding Universal Value

Old Rauma was chosen as a World Heritage site in 1991 based on the following criteria:

Criterion (iv): The town of Old Rauma constitutes one of the best preserved and most expansive examples of northern European architecture and urbanism.

Criterion (v): Old Rauma is an outstanding example of a Nordic city constructed in wood, and acts as a witness to the history of traditional settlements in northern Europe.

Old Rauma's updated Outstanding Universal Value document was ratified in 2014. The document defines the site's Outstanding Universal Value and its features and characteristics better than before. However, they are still very generally described, and the document does not mention the buffer zone's objectives. The Outstanding Universal Value document that was ratified in 2014 can be found in the annexes of this assessment.

The Outstanding Universal Value is divided into integrity and authenticity. Among other things, the ratified Outstanding Universal Value document states in regard to integrity that *"The historic houses, courtyards, fences and gates, as well as the traditional street pavements, form a homogenous urban entity."* In addition, it is stated that the buffer zone of Old Rauma is based on local topography and its scale allows for the inclusion of all visual and historic elements in the vicinity of the site.

With regard to authenticity, the document states that Old Rauma has preserved its function as a residential area and commercial centre with its market square and a variety of shops along the main streets.

Integrity:

"The town includes all elements that contribute to its integrity: the street network, city blocks, plots of land, as well as the buildings themselves. The historic fabric of the city has been built over centuries, forming different historic layers. The historic houses, courtyards, fences and gates, as well as the traditional street pavements, form a homogenous urban entity."

The buffer zone of Old Rauma is based on local topography and its scale allows to include all visual and historic elements in the vicinity of the property."

Authenticity:

"The authenticity of Old Rauma is based on the well-preserved historic urban fabric, including different historic layers and building traditions. The urban morphology, including street networks, plots of land and historical buildings, such as houses for commercial and residential use, is exceptionally well preserved. [...] Old Rauma has preserved its function as a residential area and commercial centre with its Market Square and a variety of shops along the main streets."

According to Old Rauma's Outstanding Universal Value, in terms of the shopping centre project, integrity stands for the integrity of the urban structure, meaning that it includes the street network, city blocks, plots of land, the buildings themselves, and that the scale of construction and the green zone on the border between the buffer zone and Old Rauma is taken into consideration in planning. The green zone was originally created to protect Old Rauma, and it has been marked in all land use plans since the local detailed plan drafted by Lars Sonck and ratified in 1915.

In Old Rauma's case, integrity is also a relevant term from a functional perspective, not just in terms of buildings' structural and visual characteristics. Old Rauma has the same characteristics related to integrity as other larger cities: the area offers a well-rounded range of central city functions, from residential to commercial services.

In the shopping centre's case, authenticity stands ensuring that the new construction suits its surroundings, and the preservation of Old Rauma's vitality and urban characteristics, the preservation of the balance between residential and commercial functions. It is about controlling the scale of new construction, the sustainability and functionality of used materials, structures and architecture, and maintaining accessibility.

The buffer zone

The purpose of the buffer zone is to provide guidelines for any changes in the World Heritage site's environment. *"Buffer zone 'enhances and protects' the world heritage sites"*⁸

The publication on buffer zones states: *"....an area surrounding the nominated property which has complementary legal and/or customary restrictions placed on its use and development to give an added layer of protection to the property. This should include the immediate set-ting of the nominated property, important views and other areas or attributes that are functionally important as a support to the property and its protection."*⁹

According to UNESCO, buffer zones should be given clearly defined and concrete objectives, and any possible aspects that should be taken into account regarding the area's development, such as views, should be stated.

The buffer zone should be, true to its name, an area that protects the World Heritage site and prevents any developments that would detach Old Rauma from its surroundings and transform it into "a living museum" or an area that draws its vitality from tourism alone.¹⁰ In other words, all developments in the buffer zone should support Old Rauma's preservation as a part of a normal city. There should be mutually developmental interaction between the World Heritage site and its buffer zone.

The buffer zone should not be regarded as a target area for all Old Rauma's and its surroundings' development. Instead, ways to develop the areas together should be explored, so that the buffer zone's more sustainable changes also support the preservation of Old Rauma's vitality.

The component master plan that was in force while the local detailed plan was prepared has a regulation concerning the buffer zone which states: "The area's building and traffic plans and functions must always consider Old Rauma's special position in terms of cultural history and city landscape." In addition, the regulation states that "significant projects must be negotiated with the National Board of Antiquities". The buffer zone has been better identified in the newer component master plan and related regulations.

No "boundaries of sustainable change" have been defined for the part of the buffer zone related to the shopping centre project or other areas located right on the border of Old Rauma, for example, in terms of the functions, size or number of buildings to be built on these areas. The boundaries of sustainable change based

⁸ UNESCO World Heritage papers 25, World Heritage and Buffer Zones, for example "On buffs and buffers" by Michael Turner p. 15-18

⁹ UNESCO World Heritage papers 25, World Heritage and Buffer Zones (p. 61)

¹⁰ UNESCO World Heritage papers 25, World Heritage and Buffer Zones (p.17)

on environmental analysis should be defined, for example, in future zoning changes concerning the buffer zone. Sustainable boundaries should be defined, for example, for the maximum size of buildings, the length of façades, the height of buildings, and the functions and number of buildings that can be placed in the buffer zone. Likewise, the boundaries of sustainable change for green areas in the buffer zone should be analysed and defined: to what extent they need to be preserved and what kind of features are considered significant.

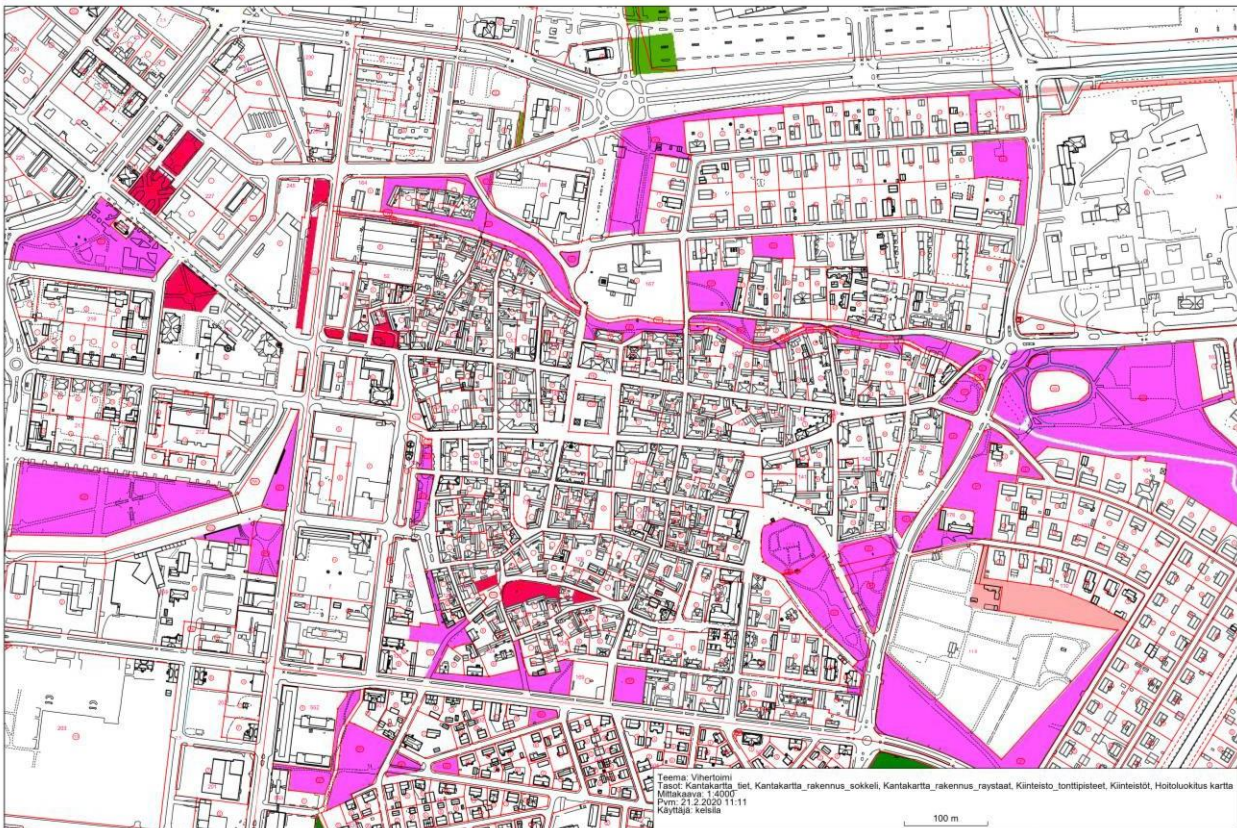


Image 12. A maintenance classification map for green areas in the city of Rauma. The map shows how Old Rauma is surrounded by a narrow green zone.

The buffer zone shows remnants of old, partially implemented zoning and other plans that are more or less directly related to Old Rauma and ideas about how Old Rauma connects to the surrounding city. The buffer zone is thus in itself a stratified historical area that must be valued, treated and designed as such. The location of the shopping centre belongs to the city's area of 19th century expansion. The area was developed throughout the post-war period and has even undergone some major changes. However, the area and construction in the area have remained on a reasonably moderate scale, and the street network from the oldest town plan (1896) has been preserved to the present day. The shopping centre's zoning will increase the efficiency and scale of the area and change the existing street network and the ways of moving in the area .

The description of the buffer zone in all documents concerning the zone is quite vague compared to the documents concerning Old Rauma. The mere expression of intent is not enough to guide the planning of construction, as the current debate on the shopping centre has shown. As the establishment of the buffer zone in its current scope and form was approved by UNESCO in 2009, the International Council on Monuments and Sites (ICOMOS) has suggested that the main view axes should be defined for the zone and these must be taken into account in the development of the buffer zone, with special consideration of the Kanali area in particular. This has not yet been done. However, green zones that should be kept open and unbuilt have been marked on the new component master plan. On the other hand, there are no special, long view axes in Old Rauma.

The boundaries of Old Rauma follow the constructed area of Old Rauma. The public green areas that have long surrounded Old Rauma, and which organically belong to Old Rauma, are located inside the buffer zone. They served as a kind of green buffer zone of Old Rauma even before gaining World Heritage status. The Kanali area is considered a public green area, and the new shopping centre will be located on the banks of Kanali.



Image 13. View of the old Tarvontori shopping centre from Kanali.



Image 14. View of the old Tarvontori shopping centre Kanali looking towards the town hall.



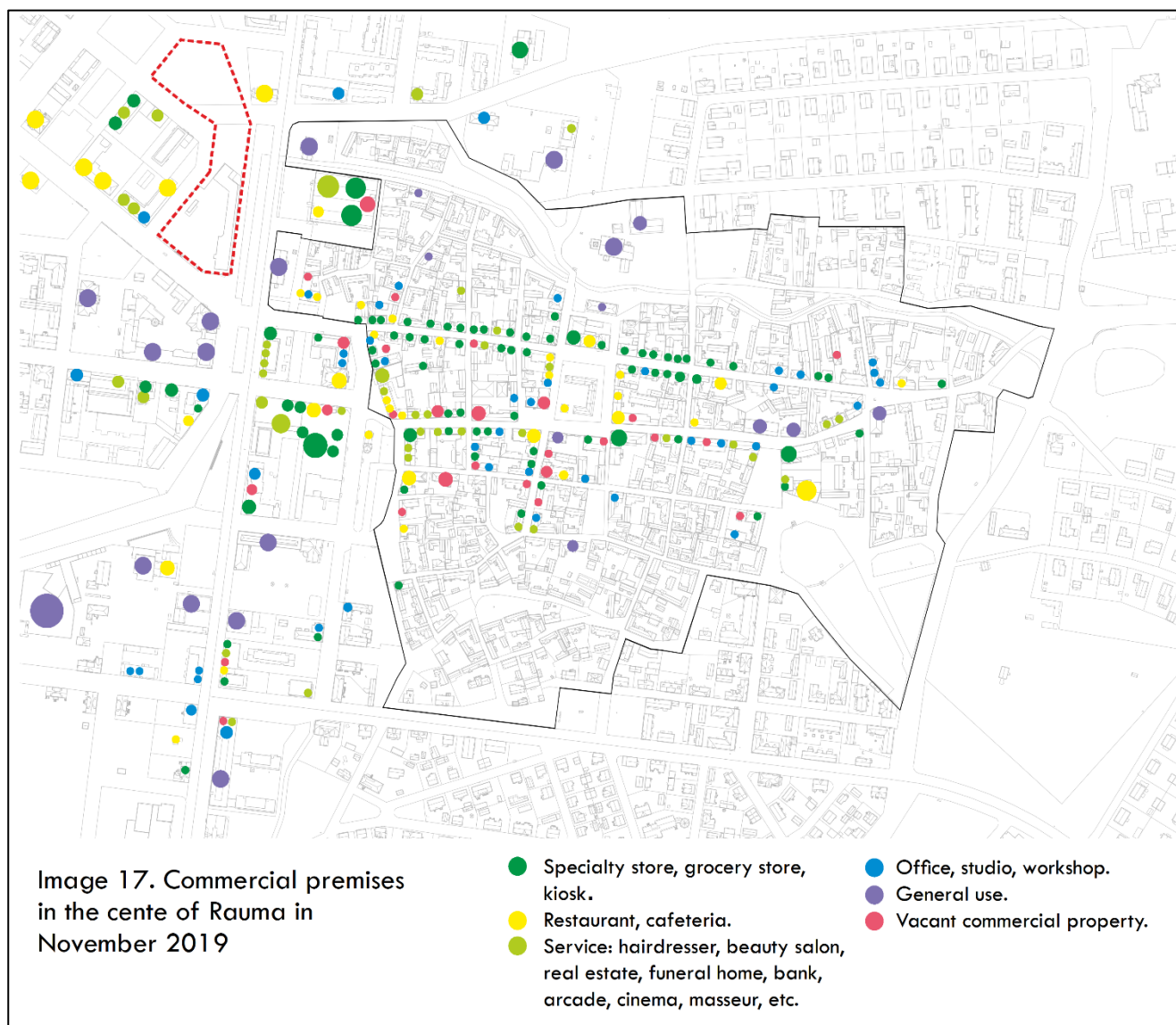
Image 15. View of the new shopping centre from Kanali.



Image 16. View of the new shopping centre from the town hall.

State of commerce based on commercial surveys conducted for the local detailed plan

This data is based on commercial surveys conducted for the zoning project in 2011–2015 and a comparative survey on the impact of shopping centres in other similarly sized cities conducted for the Heritage Impact Assessment.



The shops in Old Rauma are mainly specialty shops, and there is a high number of interior design shops in particular. In addition, there are several cafeterias and restaurants, but very few chain stores. There are no grocery stores. Some of the businesses own their commercial space, which “attaches” them to Old Rauma, and some spaces are rented. In some shops, the owners are rather elderly and if there are no successors, they will close down when the owners retire. This development is already under way, regardless of the building of the new shopping centre. (p. 8 Santasalo, Summary of Commercial Reports, 2 May 2016.)

Another development that has already begun with regard to business premises in Old Rauma is the conversion of commercial premises into apartments. The number of inquiries concerning such conversions has been constantly growing, but permits have only been issued to some. (Information on city zoning.)

As for other modern shopping centres, the point of departure will be a centre based on chain business. In this case, primarily chain stores that are currently successful in the Finnish market will apply for retail space. The new shopping centre will also be of interest to players who are not yet present in the Rauma market. As in Porvoo and Pietarsaari, new leading chain stores are likely seeking to fill the market void that currently prevails in Rauma. If the market situation allows, chain companies are likely to set up shop in the new shopping centre. (Source: Santasalo’s survey for the Heritage Impact Assessment.)

The relocation of business will, of course, leave the old space empty and available to rent. The aim should be to find new uses for the vacated business premises. The example of Hämeenlinna shows what follows when vacant business premises are not actively marketed for new uses. The attractiveness and credibility of the city centre as a place of commerce will decrease and are not easily restored. In Rauma, the closure of the Tarvontori shopping centre and the Anttila department store has weakened the city centre's credibility, and the new shopping centre that will replace them can restore the city centre's strong commercial character. (Source: Santasalo's survey for the Heritage Impact Assessment.)

Leaving key business premises vacant in the city centre fuels the closure of businesses, as vacant premises weaken the operating opportunities of the neighbouring companies and drive existing companies out of the market. (Source: Santasalo's survey for the Heritage Impact Assessment.)

In Visby, shopping centres built a few kilometres away had a negative impact on the vitality of the shops in Visby's old town. This was probably due to the fact that more remote shopping centres are easily accessible by car and they do not have a direct and clear connection to the old part of Visby, which does not increase the customer flow to the old town.

The commercial surveys concerning Old Rauma have been conducted on the assumption that business will continue as usual and grow more or less in the same way as up until now. The surveys do not specify how much the growth of e-commerce and the change in people's consumption habits will have on businesses' need for retail space. The growth of e-commerce and changes in consumption are currently affecting the need for retail space in specialty stores, with the growth in the need for retail space decreasing by 1.5 to 2.5% per year. The decline in the store base is more evident outside city centres, leading to a concentration of specialty stores. Urban centres in particular benefit from this type of development. (Santasalo, comment on the HIA draft, 4 October 2019.)

In addition to the shopping centre, the master plan enables the construction of other retail space in the buffer zone.

In the shopping centre's local detailed plan, an area of 27,885 floor square metres is reserved for commercial construction. Commercial building rights will be removed for an area of 15,470 floor square metres, so the increase to the current building area is 12,415 floor square metres, which also includes the shopping centre's foyer, corridor and stairwell facilities and maintenance facilities. According to the building permit application, there will be 15,500 floor square metres of actual retail space in the shopping centre, and at the same time 8,500 square metres of floor space will be demolished, which means that the increase in retail space alone will be 7,000 floor square metres.

Some other commercial surveys of urban centres have identified common factors that affect the operation and success of a commercial centre: *"Distance is perceived as the sum of physical distance and mental, travel-slowness or travel-hindering factors. In a commercial centre of a city, minimising this overall distance is paramount: the services must be located in close proximity to each other, so that the distances between them are short and so that the shops are perceived as easily accessible."*¹¹

¹¹ Ramboll Oy: Service network survey of Hämeenlinna city centre, 29 May 2019

7. The negative and positive impacts of the shopping centre project on universal value

Hypothetical assessment, if the Heritage Impact Assessment had been conducted before or in connection with the drafting of the local detailed plan

It is assumed that the shopping centre would have been proposed in the place where it is now being constructed and its floor area would be in the same range as the one currently planned, but no actual plans would yet be available for the building.

Criterion (iv): The town of Old Rauma constitutes one of the best preserved and most expansive examples of northern European architecture and urbanism.

Criterion (v): Old Rauma is an outstanding example of a Nordic city constructed in wood, and acts as a witness to the history of traditional settlements in northern Europe.

The impact on the selection criteria for universal value (IV and V) would have been reasonably small, as the project is implemented in a buffer zone that already has a larger commercial building. In addition, there are also other large buildings in the area. The shopping centre would not change the urban landscape of Old Rauma and it would be hardly visible from Old Rauma. The concept of *urbanism* has been mentioned in the criteria. Urbanism means, among other things, the diversity of environmental functions and demographics, as well as an abundance of alternatives. The shopping centre could be considered part of modern urbanism, in which case its construction would not conflict with the criteria.

Integrity:

- “the entire urban area dating back to between the 17th and 19th centuries”
- “the street network, city blocks, plots of land, as well as the buildings themselves”
- “different historic layers”
- “a homogenous urban entity”

In the Outstanding Universal Value of Old Rauma, the criteria describing integrity relate especially to Old Rauma’s internal urban structure and buildings, as well as to the built environment with its streets and plots. Old Rauma’s relationship to the surrounding buffer zone or green areas has not been specifically defined in the Outstanding Universal Value, and no targets have been set for it. The impact on the values describing the integrity of Old Rauma would not be compromised by the shopping centre project as the project would not require changes in the Old Rauma area. Old Rauma itself is a cohesive urban entity, outside of which, in the current buffer zone, major changes have taken place in different eras in the past, for example, in the form of the construction of commercial premises specific to each era. For example, a high-rise leather factory building that stood out from the surrounding landscape was once located on the site of the current Vänni commercial building.

The site of the future shopping centre also already has a larger commercial building, which represents the architecture of its time (1970s). The shopping centre would be larger than the old commercial building; in fact, it would have the largest floor area in the buffer zone. However, its design could be guided by means of zoning, for example, by controlling volume of the building and façade design.

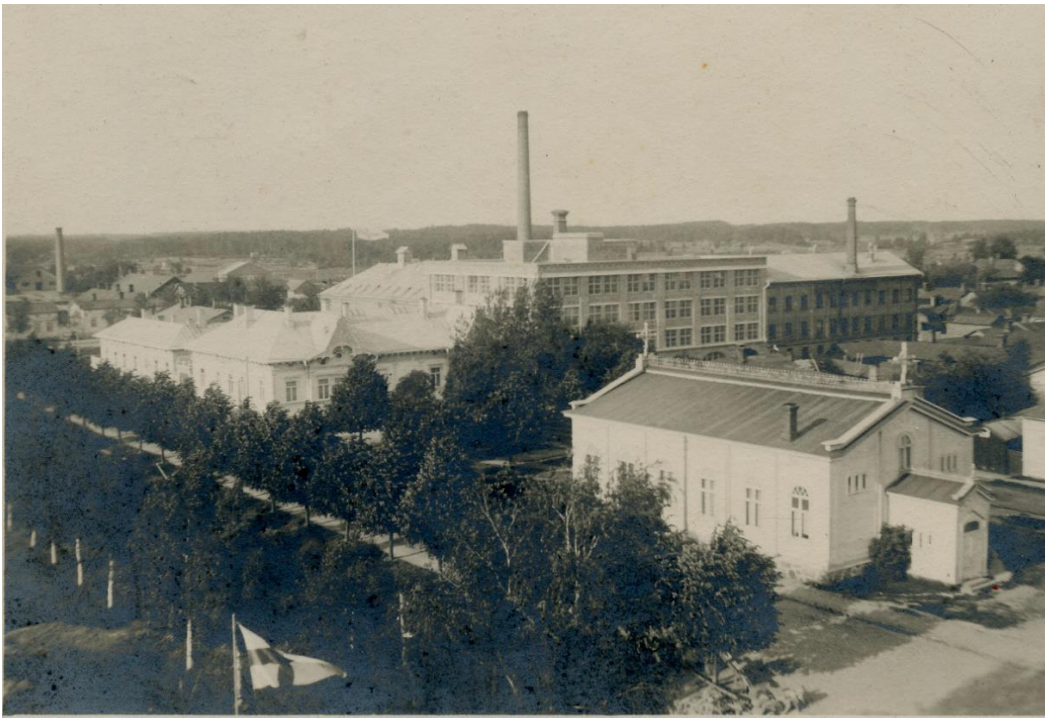


Image 18. Leather factory. The picture was taken after 1925, after the factory had already been expanded. In the foreground is Kanali, along which the new shopping centre will be built.

Authenticity:

- “the well-preserved historic urban fabric, including different historic layers and building traditions” -“the urban morphology, including street networks, plots of land and historical buildings, such as houses for commercial and residential use, is exceptionally well preserved”
- “the individual houses are well preserved and have been renovated and restored over time, taking into consideration their historic value”
- “the town has maintained a genuine local spirit, as well as a characteristic local dialect”
- “Old Rauma has preserved its function as a residential area and commercial centre with its Market Square and a variety of shops along the main streets”
- “the use of traditional building techniques, skills and materials in maintenance and repairs”

The values describing the authenticity of Old Rauma are very similar to the values describing its integrity. They mainly deal with the structure and buildings of Old Rauma and their repair, but not the buffer zone. The street network has been mentioned as one of the values, and the area reserved for the shopping centre would “cut off” one of the streets, which, however, is located in the buffer zone. Only the value related to functionality, according to which “Old Rauma has preserved its function as a residential area and commercial centre”, could be compromised by the shopping centre project. The danger would be that the stores in Old Rauma would not be able to compete with the new shopping centre, which would reduce the number of commercial activities in Old Rauma. However, this development has already been going on for some time; for example, there has been a desire to convert commercial premises in less central locations into apartments. This development is accelerating and would continue despite the new shopping centre. One major reason for this has been higher rental income from residential real estate.

Protection and management requirements:

- “Old Rauma is protected under the national legislation”
- “the site is managed by a steering group”

- “local site manager has been appointed”
- “the centre [...] has a bank of traditional building materials and organizes workshops”
- “city development is guided by detailed land use plans and cooperation between state authorities and the city, in order to overcome the challenges arising from development pressures”

Values related to protection and management would not be affected by the shopping centre project. The drafting of the local detailed plan should involve open and active cooperation between the state and municipal authorities, so that the shopping centre’s zoning would guide the construction in the best possible way, taking into account the values of Old Rauma.

“The buffer zone of Old Rauma is based on local topography and its scale allows to include all visual and historic elements in the vicinity of the property.”

The only mention of the buffer zone in the Outstanding Universal Value is in the section “Integrity”, according to which the buffer zone is based on the local topography and its extent allows all visual and historical elements related to Old Rauma to be taken into account. However, the section does not describe what these historical or visual elements are. What is meant by topography and the visual and historical elements in the vicinity of the site remain unclear. According to our interpretation, one important element in the buffer zone is the green areas right next to Old Rauma. Of these, the Kanali area would be related to the shopping centre project, so the treatment of the Kanali environment is important for the preservation of the universal value of Old Rauma.

If the Heritage Impact Assessment had been carried out before or in connection with the drafting of the local detailed plan, the shopping centre project could not have been considered to compromise the universal value of Old Rauma to such an extent that the project should have been cancelled. However, the recommendation would have been to first examine whether the necessary amount of retail space could be created by developing the existing commercial buildings. If it had been established that the old premises could not have met the commercial needs, the Heritage Impact Assessment would have been used to steer the zoning in such a way that the new building would have been designed as if it were a complex consisting of several small buildings, in which case it would not have seemed so large. In addition, zoning could have been used to control material choices as well as the use of the Kanali area.

A Heritage Impact Assessment of the current local detailed plan and building plans

Criterion (iv): The town of Old Rauma constitutes one of the best preserved and most expansive examples of northern European architecture and urbanism.

Criterion (v): Old Rauma is an outstanding example of a Nordic city constructed in wood, and acts as a witness to the history of traditional settlements in northern Europe.

The impact on the selection criteria for universal value (IV and V) are reasonably small, as the criteria refer to features and values within the Old Rauma World Heritage Site. As the construction project is implemented in the buffer zone, it does not affect the values mentioned in the criteria. The site where the shopping centre is being built already has a large commercial building. The shopping centre would not change the urban landscape of Old Rauma and it would be hardly visible from Old Rauma. The concept of *urbanism* has been mentioned in the criteria. Urbanism means, among other things, the diversity of environmental functions and demographics, as well as an abundance of alternatives. The shopping centre can be considered part of modern urbanism, in which case its construction does not conflict with the criteria.

Integrity:

- “the entire urban area dating back to between the 17th and 19th centuries”
- “the street network, city blocks, plots of land, as well as the buildings themselves”
- “different historic layers”
- “a homogenous urban entity”

Authenticity:

- “the well-preserved historic urban fabric, including different historic layers and building traditions”
- “the urban morphology, including street networks, plots of land and historical buildings, such as houses for commercial and residential use, is exceptionally well preserved”
- “the individual houses are well preserved and have been renovated and restored over time, taking into consideration their historic value”
- “the town has maintained a genuine local spirit, as well as a characteristic local dialect”
- “Old Rauma has preserved its function as a residential area and commercial centre with its Market Square and a variety of shops along the main streets”
- “the use of traditional building techniques, skills and materials in maintenance and repairs”

The shopping centre project will have an impact on Old Rauma's values in terms of integrity and authenticity by bringing a new scale of construction to the buffer zone, right on the Old Rauma border. In addition, there will be a lot of new commercial activity in the vicinity of Old Rauma, which may, directly or indirectly, have an impact on the vitality and operational opportunities of businesses in Old Rauma. The impacts can be negative or positive. The location of the new shopping centre in itself is good because it is located in the city centre, close to existing shops. In addition to the scale, the material impression of new construction also clearly differs from both Old Rauma and the buffer zone.

The impact on Old Rauma's commercial premises and commercial operations

Although the commercial surveys suggest that the stores that will be established in the shopping centre are unlikely to compete with the shops in Old Rauma, as they are chain stores and different in nature from the shops in Old Rauma, there are certain factors that can cause problems for the shops in Old Rauma:

- The development opportunities for business premises in Old Rauma are limited.
- The effect of seasons: the shopping centre becomes attractive in the winter, when you can walk and do all the shopping indoors and leave your coat in the car. In the summer, the shops in Old Rauma are on a more equal footing, at least when the weather is good.

Although there are only a few chain stores in Old Rauma, the new stores in the shopping centre will still compete for the same customers, for example, with the cafés and restaurants of Old Rauma.

The strength of Old Rauma lies in its environmental value, which in some situations can benefit the shops in the area.

The shopping centre can improve Rauma's commercial offering so that local residents do not need to go

to other cities to do their shopping. At the same time, the shopping centre can bring more customers to Old Rauma if the connection between them is functional and if there are shops in Old Rauma that are aimed at both locals and tourists. The shops in Old Rauma should not compete with the shopping centre's chain stores. Instead, they should try to find their own niche and utilise their environmental advantage.

A process to convert more remote commercial premises (along the streets on the sides of the main shopping streets) into apartments was under way in Old Rauma even before the shopping centre project. There is a risk that this process will accelerate and that commercial premises in central locations will also be converted into apartments if no commercial operators can be found to occupy them. The new shopping centre may accelerate this process. This will change the balance between housing and commerce and, on the other hand, weaken the operating conditions of the remaining shops. The reasons for this change are the better rent level obtained from apartments and the uncertainty about the city centre's future development. There is a reluctance to invest in the development of commercial premises when commercial operators are less likely to be long-term tenants than residents.

Old Rauma is connected to the commercial areas and services of the buffer zone and the city centre via Kuninkaankatu and Kauppakatu. The shopping centre will change this balance by emphasising the importance of Kuninkaankatu as a commercial axis. The fact that shopping centre Potkur and its nearby commercial premises remain on the side of this axis may weaken the position of these premises and, at the same time, weaken the position of Kauppakatu as the second main commercial street in Old Rauma, which is detrimental to the operational balance and continuity of Old Rauma.

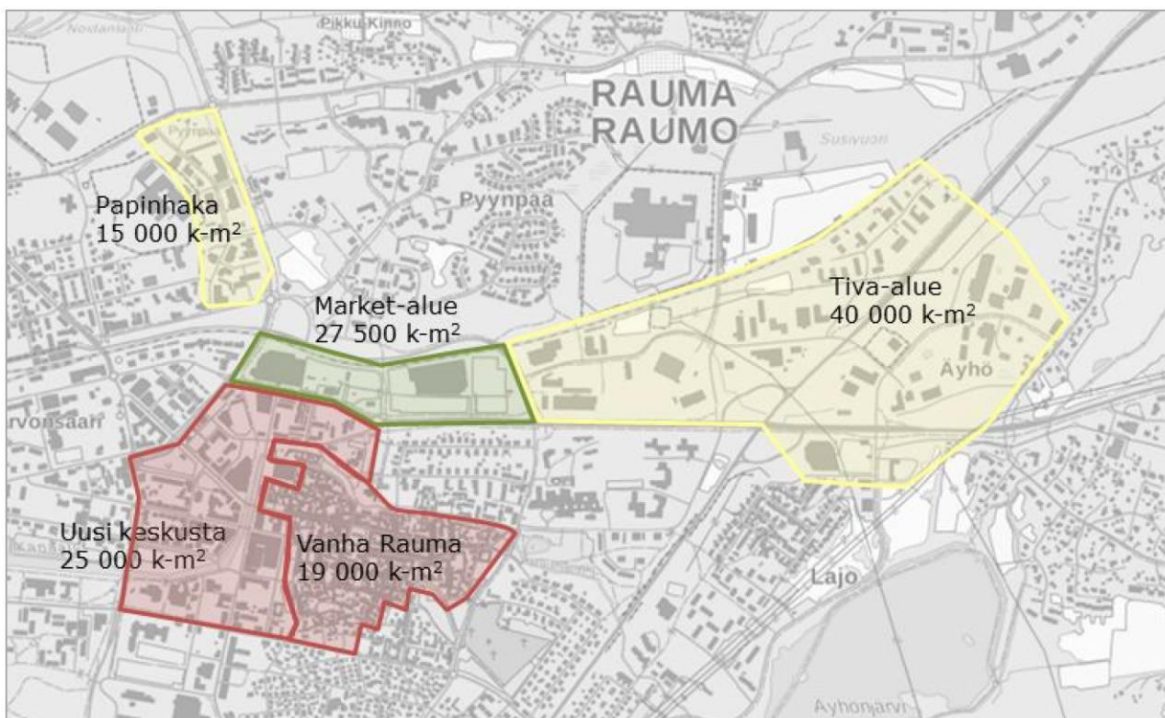


Image 19. Distribution of Rauma's commercial premises by region in 2016 and the relationship between the locations of Old Rauma and the new city centre.

(Image: Commercial survey, FCG Suunnittelu ja tekniikka Oy, 26 May 2016), Areas: Papinhaka, Market area, Tiva area, New city centre and Old Rauma. Tiva = area of large retail units.

According to the commercial surveys, the current pattern of trade is very similar between Old Rauma and the new city centre. Due to this, the shopping centre may cause a chain reaction, in which the shopping centre will empty the business premises in the new city centre, and stores from Old Rauma will then move to these slightly technically better, but still affordable premises. Due to its nature and

location, the building stock of Old Rauma cannot be radically renewed, and it will probably remain largely unchanged. At the same time, in order to remain viable, the commercial building stock of the buffer zone must be renewed as competition increases. This puts more pressure on Old Rauma's commercial services. Old Rauma's ability to respond to such ongoing dynamic changes is limited.

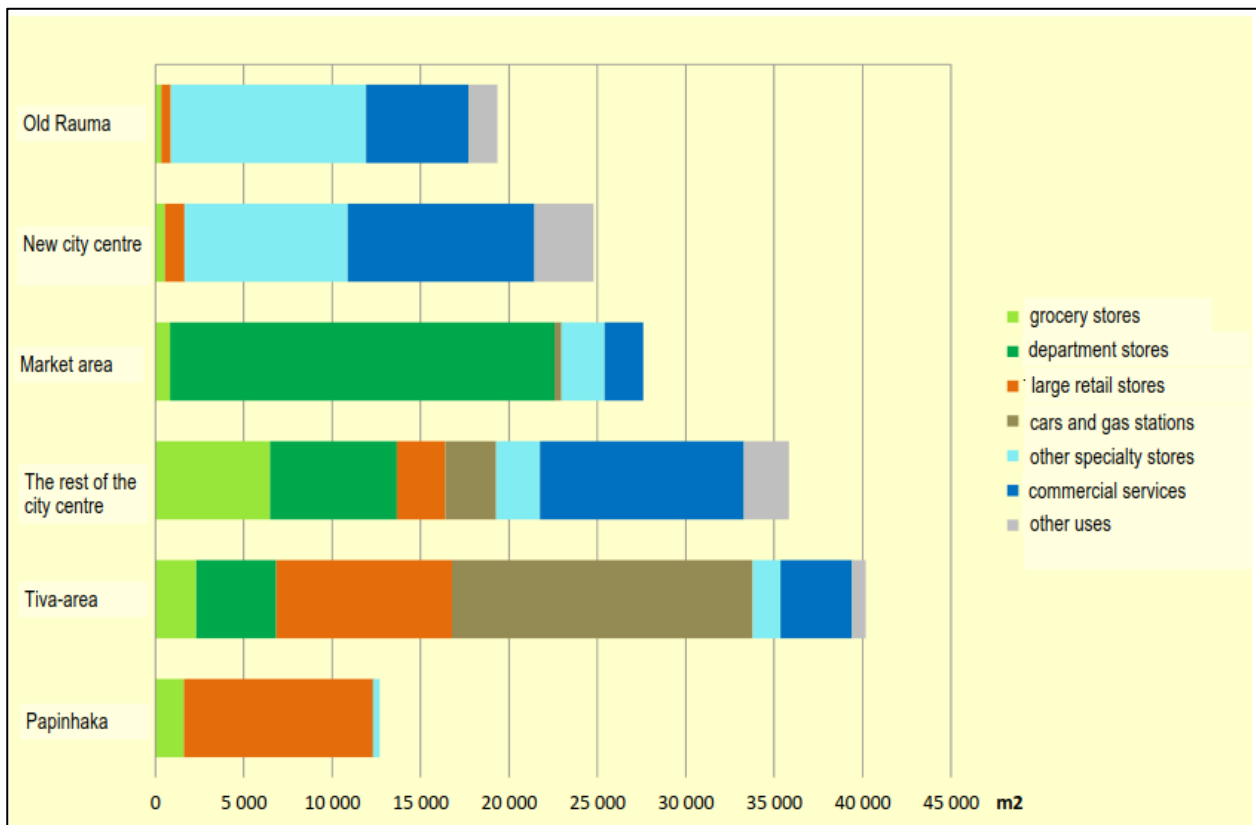


Image 20. According to the commercial surveys, trade patterns are very similar between Old Rauma and the new city centre.

(Sources: Santasalo Ky's surveys from 2010, 2012, and updates from the City of Rauma from 2015 and 2016)

The shopping centre's commercial premises have been planned close to the maximum needs of the coming years identified by the commercial surveys. But will purchasing power really increase in the future when, according to a recently published study, only three urban areas in Finland are growing, and one of them is Turku - which may also attract customers from Rauma in the future. The change in consumption is reflected in the fact that people purchase more services instead of goods, which has slowed down the growth of the retail market. According to a study conducted by the Finnish Commerce Federation, the number of specialty stores will decrease by 20–40% by 2030, as consumers obtain goods through different sales channels. However, businesses' sales value is expected to increase, although the store base will decrease. The realisation of these forecasts may lead to the vacation of commercial premises in Old Rauma and their conversion into apartments at an accelerating pace, while at the same time, there will not be enough actors in the shopping centre, and premises will remain partially unoccupied. On the other hand, the Finnish Commerce Federation announced on 27 August 2019 that according to the sales statistics compiled by the Finnish Council of Shopping Centers and KTI Property Information Ltd, shopping centres in small cities, such as Rauma, have increased their sales more than large city centres.

According to the commercial surveys, the shopping centre will bring in new specialty stores that Rauma currently lacks, and once they are established in the shopping centre, the residents of Rauma will not go shopping elsewhere. This will strengthen the local economy, which may improve the situation of commercial services in Old Rauma. According to the commercial surveys, placing a grocery store in the shopping centre will improve the services in Old Rauma. Especially from the point of view of tourism, Old Rauma will benefit from the shorter distance to a bus station.

The impact of the shopping centre on the cityscape

According to architect Jukka Jokilehto (Ph.D.), nowadays, new buildings are too often “universal”, which means that they no longer form part of the area's identity.¹² A publication on the buffer zone states that the role of architecture today is often only to promote commercialism and not to create an urban space.¹³ This “universality” can be seen in the new shopping centre in Old Rauma. The shopping centre will bring a new, larger-scale building to the buffer zone, just outside Old Rauma. The integration of parking and a bus station into the shopping centre will increase the size of the building.



Image 21. Current situation according to the floor area of buildings and the granularity of the urban structure.



Image 22. Floor areas and granularity made possible by the shopping centre's local detailed plans and other valid land use plans.

¹² p. 55, Unesco Managing Historic Cities, World Heritage Papers 27

¹³ p. 11, Unesco Managing Historic Cities, World Heritage Papers 27



Image 23. A photo of the town hall and the old Tarvontori shopping centre from 2014.



Image 24. The new Kanal shopping centre. A 3D illustration from Kuninkaankatu.

The façade of the shopping centre facing Old Rauma is very long and taller than the current (Tarvontori) building. The façade is also very expressionless, which makes it seem like a barrier and, at worst, an overly clear boundary between the old and the new part of the city. The way the Kanali area and its surroundings will be designed will have an impact on whether the surroundings of the new shopping centre will become a harsh border or a transition zone between the old and the new part of the city. At present, the edges of Kanali are green and trees grow on the banks, which softens the border between the current (Tarvontori) commercial building and Old Rauma. Kanali and its banks are part of the green area surrounding Old Rauma. Currently, the end of Kuninkaankatu towards the shopping centre is an unstructured space that does not attract people to walk from Kanali towards Old Rauma. The design of this urban space is essential for the shopping centre and the commercial services of Old Rauma to be interconnected and mutually supportive. The logic of movement will change in the urban space between Old Rauma and the shopping centre, at the end of Kuninkaankatu.

The shopping centre will bring parking spaces close to Old Rauma, which is positive. On the other hand, the shopping centre may also increase the utilisation rate of the existing parking spaces in Old Rauma if not all customers want to park their car in the shopping centre's car park. Bringing the bus station a little closer to Old Rauma is also a positive thing. Although the bus station will not physically be much closer to Old Rauma than the current one, there will be a more direct connection to Old Rauma in the future. In order to realise and take advantage of these positive opportunities, it is particularly important to provide guidance and directions from the shopping centre and bus station towards Old Rauma.

Protection and management requirements:

- “Old Rauma is protected under the national legislation”
- “the site is managed by a steering group”
- “local site manager has been appointed”
- “the centre [...] has a bank of traditional building materials and organizes workshops”
- “city development is guided by detailed land use plans and cooperation between state authorities and the city, in order to overcome the challenges arising from development pressures”

Values related to the protection and management of properties will not be affected by the shopping centre project. The steering of urban development through town planning mentioned in the last section and the cooperation between state and municipal authorities have not been as successful as possible in this shopping centre project.

“The buffer zone of Old Rauma is based on local topography and its scale allows to include all visual and historic elements in the vicinity of the property.”

The shopping centre will be larger than any other building located in the buffer zone or on the border of Old Rauma. In addition, the new shopping centre will have an impact on the view from the buffer zone, for example, at the corner of Jokiranta and Nortamonkatu or along Tallikedonkatu towards Tehtaankatu, which will be closed by the new shopping centre. The shopping centre may become a precedent for subsequent projects in the buffer zone. In this case, the question is whether it will give too much leeway and lead to overly large-scale projects.

A table of the shopping centre project's estimated impacts and their significance. In the middle, there is a "neutral" line with negative and positive impacts on both sides. The more colour, the greater the impact.

Table 1. A table of the shopping centre project's estimated impacts and their significance.

<i>Value</i>	<i>Negative</i>			<i>Positive</i>			<i>Justification</i>
Criteria IV and V							
A well-preserved example of Nordic wooden city architecture and urbanism.							The shopping centre represents a modern urban lifestyle.
Integrity							
Building scale							Larger scale than in any other building bordering Old Rauma in the buffer zone.
City landscape							Not enough architectural efforts have been made to adapt the building to the area.
Authenticity							
Commercial premises and commercial activities, the relationship between commercial premises and residential apartments.							The impact depends on so many variables that the impact can be very positive ¹ , very negative ² , or something in between.
Street network, views.							The new barrier-like façade will cut off the views and one street in the buffer zone.

¹—The shopping centre can improve Rauma's commercial offering so that local residents do not need to go to other cities to do their shopping. At the same time, the shopping centre can bring more customers to Old Rauma if the connection between them is functional and if there are shops in Old Rauma aimed at both locals and tourists. The shops in Old Rauma should not compete with the shopping centre's chain stores. Instead, they should try to find their own niche and utilise their environmental advantage. The shopping centre will bring new parking spaces close to Old Rauma, which is positive. Bringing the bus station a little closer to Old Rauma is also a positive thing. Although the bus station will not physically be much closer to Old Rauma than the current one, there will be a more direct connection to Old Rauma in the future. In order to realise and take advantage of these positive opportunities, it is particularly important to provide guidance and directions from the shopping centre and bus station towards Old Rauma.

²—Although there are only a few chain stores in Old Rauma, the new stores in the shopping centre will still compete for the same customers, for example, with the cafés and restaurants of Old Rauma. According to the commercial surveys, the current pattern of trade is very similar between Old Rauma and the new city centre. Due to this, the shopping centre may cause a chain reaction, in which the shopping centre will empty the business premises in the new city centre, and stores from Old Rauma will then move to these slightly technically better, but still affordable premises. A process to convert more remote commercial premises (along the streets on the sides of the main shopping streets) into apartments was under way in Old Rauma even before the shopping centre project. There is a risk that this process will accelerate and that commercial premises in central locations will also be converted into apartments if no commercial operators can be found to occupy them. The new shopping centre may accelerate this process.

Proposals to minimise the negative impacts

The shopping centre

The approved local detailed plan includes construction guidelines. They contain important points that guide the building design of the shopping centre in relation to Old Rauma:

- The façade of the shopping centre should not be passive in the direction of Old Rauma or Valtakatu. The shopping centre's operations should open up along Kanali. The façade on the side of Kanali and Valtakatu should not only consist of a decorative window, but, for example, foyer areas, cafés and restaurants should open out into the landscape. The surrounding city centre should be perceptible from inside the shopping centre.
- The street level should intensively interact with Old Rauma and the rest of the city centre. It is important to create a natural connection between the shopping centre and Old Rauma.
- Display windows must not be sealed. A visual connection between outdoor and indoor areas should be maintained.

The visual impression of the size of the building should be managed by architectural means. Even a large building can be adapted to the city landscape, for example, by dividing the construction into phases, in which case the different parts can be made slightly different, or by dividing the mass into smaller parts, even visually. (Phasing was not possible due to the nature of the project.) For example, Hotel Clarion in Visby consisted of several old buildings that were linked, for example, with modern glass parts. Visby also had a block called Kvarteret Östertull, which was completely new but built as though it consisted of several separate buildings. In this way, the block sat naturally in its surroundings and did not emerge as an anomalous and overly large monolithic structure.

The materials of the façades are important in the vicinity of Old Rauma. They should be genuine and durable, and age beautifully by patination, not degradation. The shopping centre should not bring new elements to the buffer zone, but should instead connect to the architecture of both Old Rauma and the buffer zone in terms of its materials, shapes and other factors that are important for complementary construction, consolidating and strengthening the existing architecture. The shopping centre should not seem more temporary than the buildings around it. However, such a risk is obvious if the building has a façade made of short-lived and trendy materials. When choosing materials, attention should be paid to how they age.

The views from inside the shopping centre towards Old Rauma and Kanali must be carefully planned so that you can see that you are next to Old Rauma. The façade should also have windows or a balcony with a view of Old Rauma.

The shopping centre must also have signs with directions to Old Rauma. Those arriving at the bus station (tourists) must immediately see which direction to head in if they want to go to Old Rauma. Setting up an Old Rauma information desk or information centre in the shopping centre or the urban space between the shopping centre and Kuninkaankatu is recommended.

The location of the entrance from Old Rauma in relation to the end of Kuninkaankatu is relevant to whether it directs customers to Old Rauma. Naming the entrance, for example, the “Old Rauma entrance” could be one guiding factor. There should be a clear and inviting route from the door towards Old Rauma, and the door should be as close as possible to the end of Kuninkaankatu.

Environmental planning

The buffer zone should be defined more precisely in terms of content, values and functions. The new master plan contains a number of good design principles, but, for example, the absence or excessive generality of the regulations on the dimensions, scale and material of the buildings is not enough to guide new construction, but these issues must be specified in the zoning plan. The green recreational area surrounding Old Rauma, which is part of the buffer zone, requires much greater planning guidance and protection due to the unnecessarily narrow demarcation of the Old Rauma World Heritage site.

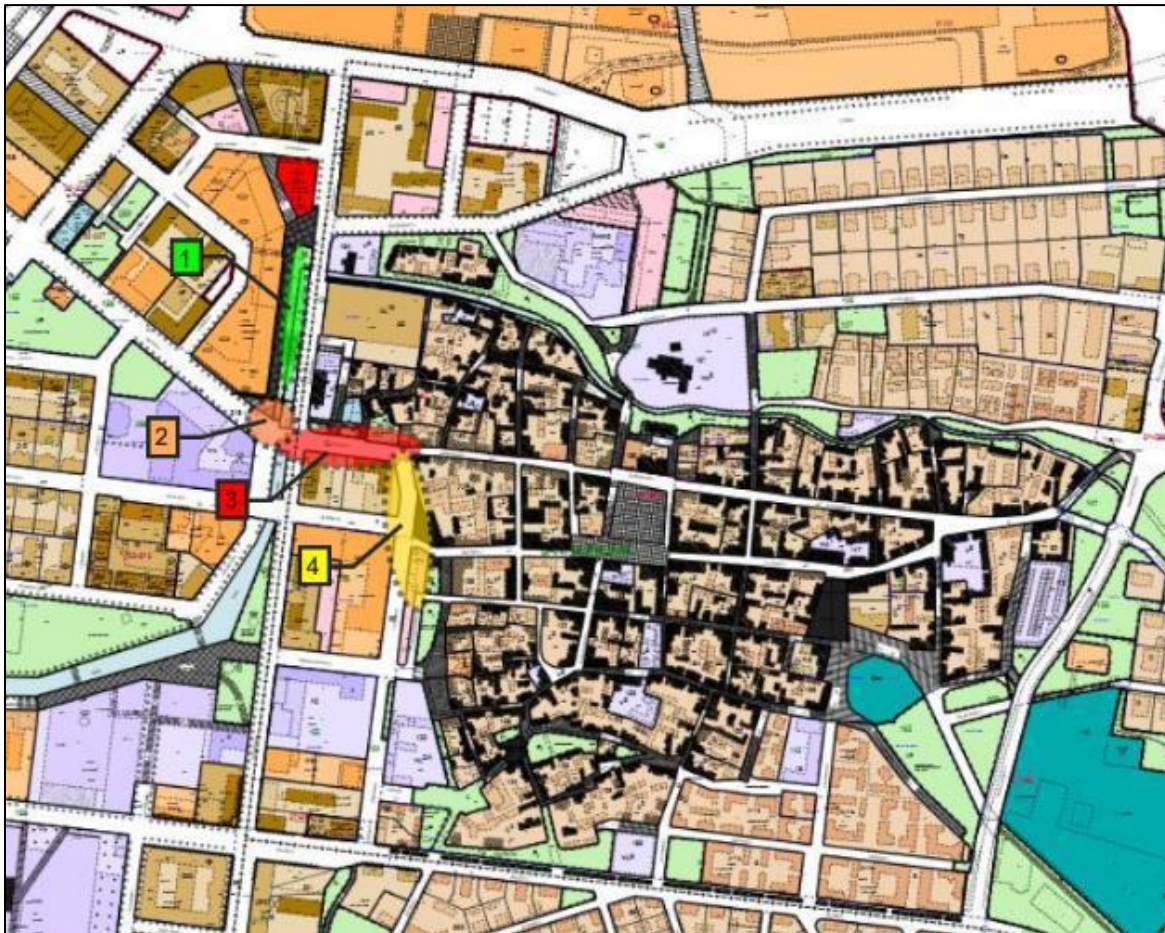


Image 25. Areas to be developed in the vicinity of the shopping centre.

1. The environment and surroundings of Kanali should be kept green.
2. The market square should guide passers-by towards Old Rauma.
3. The street level should have a “draw” that would lead passers-by towards Old Rauma.
4. Customers should also be directed to Old Rauma's Kauppakatu.

The end of Kuninkaankatu between Old Rauma and the shopping centre should be developed in such a way that it leads people from the shopping centre to Old Rauma and that the scale of the space improves, and the space is better utilised. When planning the space, it should be borne in mind that: *“The critical distance for retail has been found to be only about 10–25 metres. This means that when the distance between shops is more than 25 metres, there is already a clear obstacle to go to the next,*

perceivably distant destination and thus continue on in the urban structure. In Finland, the critical distance is often exceeded by crossing the street alone. [...] Similarly, large empty market squares reduce movement in the urban structure. When there is life, people and market vendors in a market square, a sense of distance cannot be created, but when the square is empty or filled with parked cars, crossing it is perceived as too long a journey.”¹⁴

The Kanali area is part of the green area surrounding Old Rauma and should be developed as such. It would be advisable to investigate the historical stages of the Kanali area in different eras as a basis for planning. It is recommended to keep the banks of Kanali green and to keep the amount of paving moderate. Maintaining the Kanali area as a green area will soften the connection between the shopping centre and Old Rauma.

Old Rauma must be developed at the same time as the shopping centre construction project. Clear signs must be provided from all directions, for example, for services such as public toilets, and, for example, in the market square, you must immediately see which building is a museum (Old Town Hall). At the same time, it is necessary to consider how the shops in Old Rauma could be developed, how the attractiveness of business premises could be improved or how to bring new activities to Old Rauma that would enliven the city. These issues should be examined in connection with the drafting of the local detailed plan of Old Rauma. The local detailed plan can be used to create opportunities for the development of business premises. The local detailed plan of Old Rauma should define the boundaries of the area within which no commercial premises may be converted into apartments.

Factors that should have been considered in the drafting of the local detailed plan

When drafting the local detailed plan, issues stated in the site management plan for Old Rauma concerning the buffer zone should have been taken into account. *“Old Rauma is taken into account in every significant land use project in the buffer zone, pursuant to the land use plan’s symbols. In order to secure Old Rauma’s vitality, the different functions must be well-balanced both in Old Rauma and outside the area’s perimeter. The city and its entrepreneurs are monitoring changes in business life and setting parameters for acceptable levels of change, for example the minimum number of businesses in Old Rauma.” “Ideally, the buffer zone’s functions complement Old Rauma’s services. The city has the responsibility to make accessibility between the buffer zone’s commercial functions and Old Rauma smooth and functional.”*

In the shopping centre project, the local detailed plan should have sought to steer the design even more so that the large building would have appeared smaller than it was.

¹⁴ Ramboll Oy: Hämeenlinna city centre’s commercial survey 2019

8. Conclusion of Heritage Impact Assessment

Through the assessment, we found that the shopping centre project has some impact on the universal value of Old Rauma. However, even if the Heritage Impact Assessment had been conducted before or in connection with the drafting of the local detailed plan, we would not have concluded that the project should have been cancelled. Shopping centres are part of the modern urban lifestyle and if a shopping centre is built in Rauma, the proposed location will enable Old Rauma to benefit from new customer flows.

The new shopping centre will be built in the buffer zone of the World Heritage Site, and the values of Old Rauma mainly concern and describe the urban structure, features of the buildings and maintenance within the boundaries of the Old Rauma World Heritage Site. Only one manifestation of authenticity described in the Outstanding Universal Value of Old Rauma, i.e. the balance between housing and business premises, is something on which the shopping centre may have a great impact. The nature of the project's impact (positive or negative) depends on various aspects that the project and the related operators cannot solely be held responsible for. The shopping centre will either increase the customer flows of Old Rauma if, for example, the connection between them is functional, or reduce customer flows if, for example, the stores start to compete with each other and the shops in Old Rauma are unable to take advantage of their environmental setting.

The city landscape is the integrity value that the shopping centre will have an impact on, because the building will have the largest gross floor area in the buffer zone. The large size of the building could have been masked and adapted to the environment in the design of the mass and façade, but now a single mass and a uniform treatment of the façade have been chosen as the solution. However, the planning of the surroundings of the Kanali area and Kuninkaankatu can still affect the city landscape and the views from Old Rauma towards the shopping centre. The Kanali area is part of the green area surrounding Old Rauma and should be maintained as such to soften the connection to Old Rauma. The end of Kuninkaankatu, on the other hand, should be made interesting so that it invites you to walk towards Old Rauma when coming from the direction of the shopping centre.

As a whole, we came to the conclusion that despite the changes in the city landscape and the commercial operating environment of Old Rauma caused by the shopping centre project, the World Heritage values of Old Rauma are not threatened by the shopping centre project.

In the future, we recommend conducting a Heritage Impact Assessment at the earliest possible stage for all projects other than minor projects carried out in Old Rauma or in the buffer zone, be it a zoning or construction project. A Heritage Impact Assessment is a good tool for identifying development needs and for guiding design in a direction that genuinely takes into account the cultural and historical values of the environment.

9. Literature and links to online sources

General instructions and guidelines

- Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, ICOMOS 2011 Operational Guidelines for the Implementation of the World Heritage Convention, UNESCO World Heritage Centre 2017
- World Heritage and Buffer Zones, UNESCO WH Papers 25
- Managing Historic Cities, UNESCO WH Papers 27 Tools for the development of World Heritage Site management, ICOMOS Finland, 2013

Others

- Världsarvet Hansestaden Visby HIA för Östcentrum, Aktivitetspark Murgrönan, Kvarteret Järnvägen, Södertorg
- Hämeenlinna city centre's service network survey, final report, 29 May 2019, Ramboll Oy

Materials concerning Rauma and the shopping centre

- Old Rauma's site management plan 2016–2019 and Old Rauma's Outstanding Universal Value
- World Heritage Convention 33rd ordinary session 2009 (*minor modifications to the boundaries; buffer zone of Old Rauma*)
- Component master plan for the city centre, 2003
- Component master plan 2018 and its attachments
- Länsiranta's local detailed plan (the shopping centre's local detailed plan) and its attachments
- Different versions of the shopping centre building plan
- Rauma's commercial survey, Updated compilation of commercial surveys 2011–2015, WSP Tuomas Santasalo, 2 May 2016
- Commercial survey final report, FCG Suunnittelu ja tekniikka Oy, 26 May 2016
- A survey on the impact of the construction of the shopping centre on the city centre's commercial structure and operating conditions (a survey conducted for the Heritage Impact Assessment on the impact of the construction of a shopping centre in other small towns), WSP Finland Oy, 5 July 2019

10. Annexes

- Retrospective Statement of Outstanding Universal Value
- The existing local detailed plans of the World Heritage Site and the buffer zone (zoning index map)

Old Rauma Outstanding Universal Value Statement

Adoption of retrospective Statements of Outstanding Universal Value

State Party Property: Finland: Old Rauma

Id.N°: 582bis

Date of inscription: 1991

Brief synthesis

Situated on the Gulf of Bothnia, Rauma is one of few medieval towns in Finland. The core of the town is Old Rauma, which is composed of some 600 buildings constructed of wood, most of which are privately owned, and covers an area of 29 ha. Originally situated at the seashore, the Old Town is located some 1.5 km inland from the present coastline due to land uplift. Old Rauma is both a commercial and a residential area comprising the town area within the toll boundaries of Rauma in the 19th century. The town plan structure of Rauma has been maintained since the medieval period, including the irregular street network, city blocks, plots of land and courtyards. The buildings are mainly one storey tall, and date back between the 18th and 19th centuries, while some cellars remain from earlier houses. The residential houses are placed along the street, and outbuildings such as former animal sheds and granaries are built around narrow courtyards.

The present appearance of the buildings is a result of phases of gradual changes and enlargements between the 18th and the late 19th centuries. At the end of this period, the increased wealth of the town due to ship trading resulted in the extension and modernisation of residential buildings with decorative exterior panels with Neo-Renaissance details, and the characteristic, highly decorative gates of the courtyards.

The commercial area is located along two main streets stretching through the Old Town, while the Market Square, in the middle of the Old Town, forms the main meeting point and commercial place for local people and producers. The medieval church, built around a Franciscan monastery, and the former Town Hall built in 1775-76 in the Market Square are landmarks in the harmonious townscape of one-storey residential and commercial buildings. The architecturally homogenous urban area of Old Rauma is a well preserved and representative example of traditional Nordic wooden town building techniques and traditions.

Criterion (iv): The town of Old Rauma constitutes one of the best preserved and most expansive examples of northern European architecture and urbanism.

Criterion (v): Old Rauma is an outstanding example of a Nordic city constructed in wood, and acts as a witness to the history of traditional settlements in northern Europe.

Integrity

Old Rauma includes all elements necessary to express its Outstanding Universal Value, namely the entire urban area dating back to between the 17th and 19th centuries, when the town expanded to the west. The town includes all elements that contribute to its integrity: the street network, city blocks, plots of land, as well as the buildings themselves. The historic fabric of the city has been built over centuries, forming different historic layers. The historic houses, courtyards, fences and gates, as well as the traditional street pavements, form a homogenous urban entity.

The buffer zone of Old Rauma is based on local topography and its scale allows to include all visual and historic elements in the vicinity of the property.

Climate change might cause a threat to the integrity of the World Heritage property.

Authenticity

The authenticity of Old Rauma is based on the well-preserved historic urban fabric, including different historic layers and building traditions. The urban morphology, including street networks, plots of land and historical buildings, such as houses for commercial and residential use, is exceptionally well preserved. The individual houses are well preserved and have been renovated and restored over time, taking into consideration their historic value. The town has maintained a genuine local spirit, as well as a characteristic local dialect. Old Rauma has preserved its function as a residential area and commercial centre with its Market Square and a variety of shops along the main streets. The use of traditional building techniques, skills and materials in maintenance and repairs helps preserve the cultural historic spirit of Old Rauma.

Protection and management requirements

Old Rauma is protected under the national legislation. The site is managed by a steering group with members of the national and local authorities and a local stakeholder. A local site manager has been appointed by the municipality and works from the Tammela renovation centre, providing services and technical assistance in repairs and renovation to homeowners. This service is free of charge to Old Town citizens. The centre also has a bank of traditional building materials and organizes workshops for local inhabitants to build architectural details.

City development is guided by detailed land use plans and cooperation between state authorities and the city, in order to overcome the challenges arising from development pressures.

Climate change may threaten individual buildings of Old Rauma, due to increasingly humid and warm winters that lead to a proliferation of harmful insects in wooden structures. The overall management system foresees appropriate follow-up for this issue.

(OUV approved in meeting WHC-14/38.COM/16, Doha, 7 July 2014.)

Annex II: The existing local detailed plans of the World Heritage Site and the buffer zone

