ELLINIKI ETAIRIA
Society for the Environment and Cultural Heritage

PRESS RELEASE

ELLET on the Special Spatial Planning Framework for Tourism

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The promotion of the new Draft Special Spatial Planning Framework for Tourism in Greece (hereinafter referred to as SSPF-T), which is put to a consultation process, is a positive, albeit highly delayed, step to put an end to the current disorder and, ultimately, the unregulated investment policy that damages rather than upgrades Greek destinations. However, the draft Joint Ministerial Decision (JMD) that has been made public does not serve the purposes it sets out for itself, particularly the primary goal of changing the tourism model that prevails in our country, a model that has already been exhausted. Therefore, the JMD must be swiftly amended, incorporating at least the following observations. We note that ELLET has prepared a detailed commentary on the SSPF-T draft, which has been submitted to the Ministry of Environment and Energy (MEE) and posted on its website. Consequently, the points mentioned below are necessarily a limited summary of that commentary.

The repetition of the current model:

The draft JMD promotes almost exclusively large investments in out-of-plan areas throughout the country, including protected areas and (a novelty) uninhabited islands over 300 stremmas[1] .These forms of investment have been institutionalized since the 2010s and all include furnished tourist residences – in other words, residences built under the construction terms of tourist facilities. These large investments are located almost everywhere, including on small and medium-sized islands, whose identity they irreparably alter.

The distinction of areas:

Although the draft JMD provides for three categories of area distinctions based on different criteria (the concentration of hotel beds as a common denominator for tourism development, their geographical form, and their potential for developing thematical forms of tourism), there is no significant differentiation regarding the type and size of investments allowed. Organized Tourist Development Areas (OTDA), which are by definition large-scale investments, are promoted everywhere. In an effort not to completely exclude small-scale tourist development in out-of-plan areas, the SSPF-T sets a minimum plot size for hotel construction at 16 stremmas in Area A (Area of Control of tourist Development) and 12 stremmas in Area B (Developed Areas). Consequently, there is no differentiation in how SSPF-T approaches tourism development: it focuses on the expansion of the tourism sector through accommodation and increases the dependence of areas of the country on tourism.

For diagnosing the development size of areas, short-term rental properties that have long altered the composition of accommodations were not taken into account by the framework. As of July 2023, these short-term rental units exceeded hotels in terms of bed capacity and have changed the characteristics of demand. Any planning that does not consider the catalytic

[1] a stremma is 1000 square meters

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changes brought about by short-term rentals, including their environmental and social consequences (such as housing issues), is inherently inadequate and outdated.
Additionally, the territorial unit used for area distinction, based on the number of hotel beds, is the municipal unit. However, islands are geographically defined destinations with brand names that appeal to specific markets, and tourism pressures affect the whole territory of these destinations. SSPF-T should have assessed the size of tourism development per island destination (with the possible exception of Crete and Evia) and provided corresponding directions. The very small parts of certain islands designated as Area A (Control) do not protect these islands from over-tourism, which is already present and spreading across their entire territory.

The JMD does not recognize saturated areas, i.e., areas that have exhausted their capacity for tourism growth, risking gradual abandonment by demand or attracting low-return tourism. The strictest category of areas, Control Areas, which are very few and far fewer than those actually showing signs of degradation, will continue to accommodate 4- and 5-star hotels! The only concession in the JMD pertains to protected areas and uninhabited islands, where the planned hotel and real estate investments are permitted to use half the current building coefficient.

Wishful thinking regarding special forms of tourism:
The distinction of areas based on their potential for developing special or thematical forms of tourism, which could gradually diversify the country's overall tourism offer, remains largely theoretical and impractical. Emphasis should be placed on the forms for which the country or its individual regions have comparative advantages. However, the draft JMD accepts all forms of tourism, including the most controversial under current conditions, such as golf, ski resorts, and cruises. A genuine shift towards special forms of tourism requires choices based on comparative advantages, special specifications, incentives, and the involvement of the public sector (e.g., local authorities, destination management and promotion organizations) in promoting forms of tourism that need to be developed outside private land.

Insufficient reference to the climate crisis:
The SSPF-T's reference to the climate crisis is utterly inadequate, as it continues to promote investments and provide growth directions for the tourism sector without considering the consequences of the already present crisis. The draft JMD contains no binding guidelines regarding the climate crisis and the vulnerability of areas. Moreover, issues of water supply, wastewater, and solid waste management, as well as energy – for which there are already severe problems and conflicts in tourist destinations – are addressed theoretically, as wishful thinking, while they risk tarnishing the image of numerous tourist regions, not just islands. The possibility of curbing the growth in demand until these issues are resolved as far as possible does not concern the SSPF-T. In general, adding new infrastructure (e.g., roads, desalination plants etc) on small and medium-sized islands for seasonal use only should be avoided, even for the protection of their tourism product. No one seeks a tourist destination where the landscape is constrained and "swallowed" by public works (and, of course, uncontrolled construction).

Destinations already in a state of degradation:
Some destinations, particularly islands, are already showing serious signs of degradation in their natural and cultural resources (in other words, the very tourist resources that attract visitors) and excessive concentrations of people, traffic, and construction. Addressing this phenomenon would require immediate regulatory measures, as it cannot wait for the adjustment of underlying planning to the directions of the SSPF-Tor the implementation of SSPF-T, even if it were to be amended by the time first-level planning comes into effect.

In conclusion, the SSPF-T has not adequately evaluated:

- The serious social impacts of the pursued growth (and certainly not sustainable development) on local communities.
- The irreversible consequences on the natural and cultural landscape of destinations.
- The serious risk of gradually abandoning overburdened destinations by demand.

Our summary opinion is that it should be promoted swiftly to halt the current state of lawlessness, after the necessary additions and amendments, such as:

- Binding guidelines for addressing the climate crisis and the vulnerability of tourist areas.
- Categorization of areas based on current, updated statistical data (including short-term rentals).
- The use of islands as the minimum spatial unit (including those with more than one local authority, as they constitute destinations), except for Crete and Evia.
- Suspension of the creation of new beds of any form and category in Areas A and B.
- Prohibition of strategic investments in the same areas.
- Drastic reduction of out-of-plan tourist construction across the country.
- Prohibition of the construction of new beds of any form and category in Organized Tourist Development Areas (OTDA) in protected areas and a complete ban on tourism investments on uninhabited islands.

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