

The Hague, 2 July 2013

Mr. Ioannis Maniatis  
Minister of Environment, Energy and Climate Change  
119 Mesogeion Street  
GR-115 27 Athens

Re: Review of Greek Tourism Planning Scheme

Dear Mr. Maniatis,

As we learned from Elliniki Etairia, our country representation, during our recent 50<sup>th</sup> Anniversary Conference in Athens, the danger today is even greater than in 2008 with much worse proposals currently under public discussion in Greece until 22 July. These grant the favourable zoning regulations that have hitherto applied only for hotels to projects which are mainly oriented towards the construction of tourist housing and which thus open large areas of the coast to speculative building that will not require the level of capital investment involved in the construction of high-class tourism facilities. Here are some comments:

1. Europa Nostra objects in principle to sectoral scheme plans taking precedence over regional plans. In all countries, but particularly in countries as geographically diverse as Greece, it is essential regional land use planning should take priority. Regulations on the mainland and the islands may need to be very different in order to obtain the best economic, environment and social consequences for Greece as a whole.
2. Tourist houses in general contribute considerably less to the economy per visitor per day than do hotels. Therefore tourist houses should not be encouraged wherever the general level of costs is higher than the average in the country as a whole since the activity is then economically marginal. If any area has increased costs compared to others it can compete only through a higher level of prices or alternatively longer periods of visitor stay. This is the situation of the inhabited islands of Greece whose transport costs, compared to others, have been impacted dramatically over the last few years by the increased cost of fuel. If the Greek Government is genuinely interested in the future prosperity of the islands, which we are confident the Greek Government is, it should discourage the development of tourist houses/apartments but instead encourage quality/higher price tourism in hotels and activities that will give an incentive to visitors to stay for a longer period (examples are the conservation of traditional houses, signposting of footpaths for walking on the shoulder months, improvement of facilities for sailing and boating etc).

In our view, the 2009 Tourism Planning Scheme has already done damage through setting too low a minimum (of 90 square kilometers island area) above which theoretically mixed but in practice largely tourist housing projects are permitted, on a quite inadequate area of 15 hectares-inadequate, that is, for high quality development. Quite arbitrarily, and, we dare say irresponsibly, it is now proposed to reduce the 90 square kilometers to 70 square kilometers. Merely the mention of the six islands

affected, Aigina, Mykonos, Santorini, Serifos, Sifnos and Syros, should be sufficient to alert you to the unsuitable development which regrettably is likely to ensue.

In view of the totally different conditions prevailing on the islands and the mainland we urge you to consider increasing the 90 square kilometers minimum where allegedly “mixed” but in fact largely tourist home/apartment development would be permitted. We suggest the minimum should be 130 square kilometers, thus protecting from economically and environmentally inappropriate development the islands of Skopelos, Ithaki, Astypalaia, Kythnos, Ios, Kalymnos and Amorgos. Water availability and other infrastructure considerations also need to be taken into account.

3. It is in the long-term economically damaging to press for investment that is environmentally unsustainable since such investment reduces Greece’s most fundamental comparative advantage, namely its stunningly beautiful but also for geological and biological reasons incomparably varied nature, unique in Europe and the world. Various forms of mild development are rightly permitted in Natura 2000 areas but we cannot agree that tourist house/apartment projects of the type envisaged constitute “mild development”. A trip around the coast of Turkey will easily persuade an impartial observer that such forms of development drastically alter the environment and should therefore not even be considered in any protected area. Turkey also has a cost advantage that Greece does not enjoy: it is therefore vital that Greece maintain its comparative advantage in the quality of visitors’ experience, of nature and cultural heritage.
4. The rationale with which tourist house/apartment projects is insistently being promoted, namely that Greece’s current need is for a higher rate of investment and economic activity, is misleading and indeed already economically discredited. We can appreciate the rationale for Keynesian policies in the large urban conglomerations, where unemployment is currently concentrated. There is no such rationale for encouraging any temporary investment boom in areas where unemployment is much lower, and which, if successful, would damage Greece’s foremost comparative advantage, while, if unsuccessful, might lead to a collapse of any construction boom and possibly of the banking system, as has already occurred both in Ireland and Spain.

We attach our Irish member organisation’s (An Taisce) report on the Irish building boom that led to the bankruptcy of Irish banks and the severe economic problems of Ireland as a country. Regrettably we have no similar document from Spain that is available in English, but it is common knowledge that land and house/apartment prices there are still falling after Spanish developers, supported by regional politicians, overbuilt tourist house/apartment accommodation, thus at one stroke destroying both their environment and their economy, resulting in unemployment rates higher even than those in Greece.

The above make clear that it is not wise to set economic against environmental considerations on this issue. Both argue against such proposals as are contained in the current Tourism and Tourism Planning Scheme regulation proposals. Also it is from this point of view irrelevant whether Spanish developers built upwards while Greeks may build sideways. The ultimate economic and environmental consequences will be very much the same.

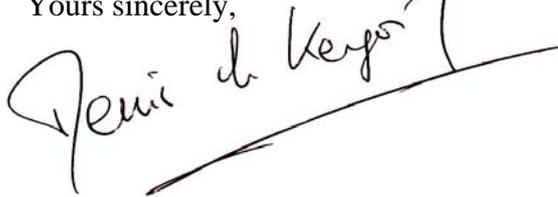
5. Sustainability also has a significant social element. The disturbance to comparatively concentrated, comparatively egalitarian and comparatively viable island communities,

very different from major conurbations, argues that the current proposals are particularly inappropriate for most of the Greek islands not only because of economic and environmental conditions but because they will bring undesirable social disturbance.

6. There remains more than adequate scope for the development of tourist homes –first through the restoration of old houses in traditional villages, including those abandoned or otherwise dilapidated; second, in major resorts where the existence of massive tourist investment and infrastructure makes the purchase of a tourist home attractive to wealthy foreigners; and finally, connected with healthcare facilities for retired people, the creation of which requires considerable infrastructure. None of this however supports anything like the measures currently being proposed.

We would therefore urge you to intervene in order to achieve substantial amendments to the Tourism Law and Tourism Land-Use Regulations currently under consideration, with particular emphasis on the Greek islands and island communities. We believe this would represent a major benefit for Greece’s economic, environmental and social development, and also an admirable major achievement for your Ministry and yourself.

On behalf of the Europa Nostra Board,  
Yours sincerely,

A handwritten signature in black ink, reading "Denis de Kergorlay". The signature is written in a cursive style and is positioned above a long, thin horizontal line that extends to the right.

Denis de Kergorlay  
Executive President