

OBJECTIONS IN THE CONSULTATION FRAMEWORK ON THE SEIS FOR THE SUP OF EKTER IN THE AREA OF KOLYMBITHRES ON PAROS

On July 29, 2022, the Department of Urban Planning of the Ministry of the Interior issued an invitation inviting the interested public to express in writing and sufficiently documented their opinions on the Strategic Environmental Impact Study (SEIS) and its accompanying material for the Special Urban Planning Plan (SUP), which has been prepared by the company EKTER SA. for the area of her property in Kolymbithres, community of Naoussa, Paros.

Responding to this invitation, the following signatories express in this text our views on the said SMPE and the corresponding PES.

General comments

The SMPE refers to the drawing up of the PES for the spatial development of the property owned by the EKTER company in the Kolymbithres area. Based on the PES, the construction of a tourist complex with a total built-up area of 12,046 sq.m. is planned for this property, in a total area of 327.84 acres. The main direction of the PES is

- a) that it is about organized soft tourism development of a supra-local scale and of strategic importance and
- b) that this development is fully compatible with the wider framework of sustainable development, as determined by the general guidelines established by the United Nations, the European Union, our country's National Policies for sustainable development and climate change, Regional Planning for sustainable development, etc.

The allegations made in the SMPE are hollow for the following reasons:

- The construction of a tourist complex with 440 beds and an area of more than 12,000 sq.m. in one of the few remaining unspoiled areas of Paros, which as is well known suffers from the consequences of uncontrolled overbuilding, can in no way be considered an example of mild tourist development. If one takes into account the interventions that accompany facilities of this type (road construction, swimming pools, outdoor spaces, etc.) but also the scale of Paros, one realizes that this is a major intervention in the space that cannot in any way be considered mild. It should be noted that the few examples of large units in Paros (e.g. Porto Paros hotel in the same area and Summer Senses hotel also owned by EKTER), which cannot be considered successful, as they have brought about a significant change in the physiognomy of the place, are significantly smaller than planned with the new PES.
- The strategic importance of development is controversial. It probably makes sense in the context of maximizing the country's private investment program at all costs. It would perhaps also make sense if the development took place on a down-to-earth tourist island or in a border area. But it has no meaning in the context of sustainable development in Paros, which is systematically invoked by the SMPE. In the case of Paros, it would only have strategic importance if it was organically linked to an overall plan to restructure the tourist product in a sustainable direction.
- Compatibility with the wider framework of sustainable development is false. It is obvious that this is a typical traditional type of tourism investment with no significant sustainability features, beyond some common sites and vague references to saving energy and water or connecting with the area's cultural environment and primary sector producers.

For all of the above, a more detailed comment is made in the continuation of the text.

Other major problems of SMBE are the following:

1. The obviously problematic claims regarding the feasibility and objectives of the investment, as presented in more detail later in the text. In the relevant chapter of the SEA, positions are formulated, such as that the project will preserve and highlight the natural environment of the area, will contribute to the diversification of the island's production base and reduce dependence on tourism and other similar activities, will lay the foundations for the development and networking of sustainable alternative tourism in the Aegean and others that are obviously not in any way related to the PES under consideration.

2. An approach to the issue of the bearing capacity of the development area is being attempted in the SMPE. This approach is piecemeal, as it ignores a number of indicators taken into account in relevant studies (e.g. a study by the Hellenic Society for the case of Santorini), such as natural resources and public infrastructure, while comparing the relevant indicators only with overdeveloped tourist islands (Mykonos, Santorini) that have obvious problems of bearing capacity. In this context, it does not touch on the issue of the carrying capacity of the beaches in the area, which is well known to have already exhausted its limits, as these are small beaches that have 100% occupancy for more than 2 months of the year.

3. The presentation of the development plan in chapter 4 has serious problems, such as:

- It states that based on the relevant circular of 2012 of the Ministry of the Environment, the only access road to the development area is defacto municipal (public), given that it serves the access to the Sewage Treatment Facility of Naoussa. This is not the case today, as the recognition of a street as municipal presupposes in any case the issuance of a relevant decision by the Region and this has not been done. Access to a public infrastructure, such as EEL Naoussa, is a condition that potentially allows the identification of the road, but this currently does not exist.
- It does not essentially refer to the issue of the traffic burden that will arise as a result of the significant increase in vehicle traffic to and from the development area on an already problematic road network serving the area in terms of characteristics and traffic load, nor does it make any quantitative estimates. If we take into account the vehicle movements of both the residents of the 440-bed complex and the auxiliary ones (supplies, etc.), it is estimated that in the July-August period, more than 1000 movements per day will be added to an already burdened network from the new development and only.
- In the last point, the expected reopening of Porto Paros as a very high-class hotel in the coming years should be taken into account. This reactivation will also cause a very heavy traffic load on the same network. The cumulative effect of the two large complexes is expected to create suffocating traffic conditions on the specific road network and increase the chances of accidents, which in the summer season are many in Paros.
- Refers to the request for the supply by DEYPAP of a quantity of water equal to 72,000 m³ annually. This quantity is obtained on the assumption of per capita consumption of 450 liters/day. This particularly high demand cannot convince that it is part of a framework of sustainable development. On the contrary, it is the basis on which the water supply in conventional luxury hotels is planned. Also, the request for a water supply from DEYAP, equivalent to 2.5% of its annual production (about 2.85 million square meters), a rate not negligible, is not compatible with the declaration on sustainable management of natural resources.

4. The presentation of the alternative solutions suffers from the following points:

- Presents as the first and zero alternative the application of the terms of the current GIS. However, it does not mention that, based on the current regime, the implementation of this solution is unfeasible, as there is not, nor is it planned to be, a recognized road network in the area, which is a condition for the division and subsequent construction of the area.
- Presents as a third alternative the application of ESHASE instead of EPS, which it rejects as unsustainable, as it implies a significantly larger building, with a total area of 46,395 sq.m. against 12,046 sq.m. of the proposed one. However, there is no documentation as to why one is sustainable and the other is not, an example of the general inability of the SMBE to provide a documentation of the sustainable nature of the proposed development.

5. The claim that the flora of the area will suffer a positive effect after the construction of the project is false and misleading.

The phrygianian ecosystem that has developed in the area has special characteristics, which are given to it by the recovery from overgrazing, the northern orientation, as well as by the proximity to the sea. Land-use change destroys the biology and microbiology of the soil, and with the earthworks envisaged, there is no chance for it to recover, even if gradual plantings are made along the way. And the recommendation of the researchers to irrigate the newly planted areas as well as the natural areas that will remain untouched by the works (a claim that is completely dubious for the area where construction is planned) shows ignorance of the functioning and needs of the phrygianian ecosystems. Also, the risk of erosion from earthworks has been underestimated: the area presents a high to very high risk of soil erosion mainly due to the geological background, and this is also explicitly mentioned in the study. Earthworks during the dry months are mentioned as a measure to deal with the problem. But in a project of this size, the earthworks will take at least 2-3 years, and it is impossible to avoid soil erosion when the expected excavation volume is 28,000 cubic meters on an area of more than 200 hectares.

6. The area in which the project is located is one (#GR153) of the Important Bird Areas according to the Hellenic Ornithological Society and Birdlife International. That is, it is an area that is of vital importance for the conservation of the birds of Greece, and specifically for the seabirds that nest on the steep rocky shores of the area. The unplanned construction, the disturbance from the intense human presence and the presence of rats and other domestic animals, which come to an area together with people, are serious threats of extinction to the birds. The claim that after the construction period the birds will return thanks to the vegetation that will be planted in the project is completely false: the seabirds make their nests on the steep rocks in the area and some of them mate and lay eggs during the summer months, when the human disturbance in the area will be the maximum.

7. Finally, the complete absence of reference to accessibility issues in a development that appears to be sustainable is highlighted.

DETAILED COMMENTS

1. The EIA refers in chapter 3.1 to the feasibility of the project. The following references are found there:

At the local level, the development prospects of the island of Paros will continue to be found in tourism, given that the sector has a great comparative advantage due to the tourist offer it has. In addition, the tourist resources and the hyperlocal transport infrastructures (airport, port of Parikia) allow the further development of tourism, as well as the orientation towards high quality tourism.

The claim for further development of tourism in Paros is controversial, as the island has reached a point of high saturation during the peak summer season. The broader goal set at the global, European, national and regional level is not further development but diversification and sustainability, goals that are served only rhetorically by the proposed PES.

However, the existing spatial organization and development of tourism activity on the island is characterized by small sizes and fragmentation with negative consequences both for the environment and the spatial organization of the island and for the development of the tourism sector.

The answer to the problems of spatial organization is not to build huge new units outside the scale of the island. The Summer Senses hotel owned by the same investor, although luxurious, is a bad example of a massive structure that distorts the landscape and alters its character. In addition, in the wider area of Kolympithra there are already some of the largest and most luxurious tourist units on the island.

Given the above, it is considered appropriate and absolutely necessary to strengthen tourism development and the shift towards a higher quality tourism on the island of Paros, as this will contribute to the positive population and economic development of the area in contrast to other areas of the island area which are declining and shrinking demographic and economic.

Extremely controversial claim that it is considered appropriate and absolutely necessary to strengthen tourism development in Paros.

In the SMP it is stated that the PES is linked to two objectives:

» *On an economic level, the investment will create new jobs, highlight a new tourism product and therefore a new emerging tourism market. The importance of these economic effects should not be underestimated especially in the current time of deep economic recession that the country is experiencing.*

What new tourism product and emerging market will the investment highlight? It does not appear anywhere in the sentence. The reference to a deep economic recession of the country is outdated.

» *The second objective refers to the closely linked relationship between environment and development. This proposal adopts and defends the principle that the protection of the natural and cultural environment is also achieved through its promotion. In addition, the promotion of new technologies to save natural resources, alternative forms of tourism and programs to raise public awareness of the value of the island's valuable natural and cultural resources will contribute to the protection, promotion and preservation of the natural and cultural environment of the region.*

Where does the relationship between a typical tourist investment and the protection and promotion of the natural and cultural environment come from? Where does the promotion of alternative forms of tourism and public awareness programs come from? There is no concrete reference and commitment beyond the declaration of some vague good intentions.

The following are mentioned in the specific objectives of the PES:

» *Maintains and highlights the special natural landscape of the area, as it involves mild interventions and small construction without significant interventions in the natural landscape of the area.*

Not valid. The construction of buildings with a total area of more than 12,000 sq.m cannot be characterized as small construction without interventions in the natural landscape. together with roads and the shaping of the surrounding area. On the contrary, it is a major intervention in a pristine landscape, one of the few remaining in Paros.

» *Contributes to diversifying the island's production base and reducing dependence on tourism.*

Not valid. It further intensifies the dependence on tourism. Possibly and incidentally it can secondarily strengthen the primary sector but this remains at the level of rhetoric without a concrete proposal.

» *It lays the foundations for the development and networking of sustainable alternative tourism in the Aegean.*

Not valid. There is no specific element of sustainable alternative tourism in the development. As is well known, sustainable tourism does not develop with announcements but with the implementation of specific programs, actions and synergies.

» *It connects the new model of soft tourism development with innovation and new environmental protection technologies (bioclimatic planning, water and energy saving, waste management, etc.) that is, with „smart tourism development“.*

Not valid. Beyond general references there is no specific perspective. On the contrary a) reference is made to water saving when a very high per capita water consumption is estimated (450 litres/day) and a request is submitted to DEYPAP to secure the entire quantity (about 200 km/day) from its network , b) Waste management refers to channeling it into the Municipality's management system, c) there is no quantitative assessment of energy consumption and its promised savings.

» *Finally, as a proposal based on the model of sustainable-alternative tourism, it contributes to the mitigation of seasonality and to the better distribution in time and space of tourist activity and consequently to the creation of non-seasonal but permanent jobs.*

No specific evidence or measure shows the credibility of this claim.

» *The present spatial development proposal will therefore make a catalytic contribution to our creation of a new tourist market that will act as a driver of development for the rest of the island's economy, especially the primary sector, resulting in a medium-long-term contribution to the removal of the monoculture of tourism and fostering multiple employment.*

A general statement. It is clearly a purely touristic investment that reinforces the monoculture of tourism.

2. The EIA is referred to in chapter 3.2 in the Environmental Legal Framework, specifically in the United Nations 2030 Agenda for Sustainable Development, in the EU Strategy for Sustainable Development, in the European environmental protection objectives, in the National Strategy for Sustainable Development, in National Climate Change Strategy, in the National Energy and Climate Plan. In chapter 3.3, it refers to the relationship of the Plan with other Plans and Programs, such as the PGHSAA, the EPHSAA, the South Aegean PGPSAA, the Review-Evaluation Study of the South Aegean PGPSAA and the Paros GIS.

In all of the above, and especially in chapter 3.2, an attempt is made to document the compatibility of the PES with the objectives of the respective actions.

This documentation is poor, general and unclear, as evidenced by the following references:

p. 3-30

The proposed PES satisfies the above individual objectives, offering high levels of economic productivity, decent jobs and promoting innovation through the promotion of alternative tourism.

p. 3-31

The proposed PES adopts at the core of its design policies that promote the development of a sustainable model of competitive quality tourism, against scattered low-level tourist development dominated by anarchic diffuse construction and the lack of planning and infrastructure for the management of natural resources and waste that arise from the activities that are developed.

p. 3-32

The proposed PES meets the objective, as it promotes environmental management policies that protect the marine ecosystem and promotes a model of sustainable tourism and interaction with nature.

p. 3-36

The implementing body of the investment will implement every possible measure to minimize the pressure on soil and water resources and will respect good water quality, in order to be a model of environmental management.

p. 3-41

During the preparation of the proposed PES, the requirements of the objectives of the EU and Greece regarding the exercise of environmental policy and the sustainable development of tourism were taken into account. More specifically, the principles of sustainability and environmental protection were incorporated such as: setting a low building factor, conditions for limiting and controlling building to protect the natural and cultural landscape of the intervention area (minimum distance of building line from small watercourses, continuous supervision of construction works by competent archaeological services, preservation and enhancement of the property's natural vegetation, utilization and preservation of the topography of the land, etc.), provision of high-standard environmental infrastructure to minimize the impact on the island's water supply, drainage and energy networks. The implementation of the proposed PES will allow the Intervention Area to function as a zone of organized soft tourism development of a supra-local scale and of strategic importance, which will primarily contribute to the transition towards a sustainable tourism development on the island of Paros, as well as to the strengthening of competitiveness and extroversion locally and nationally.

In the general report, only the application of a low building factor is specified, which is obviously negated by the building of more than 12,000 sq.m. and procedures that are completely self-explanatory, such as building away from small watercourses, supervision by the archaeological service, etc.

p. 3-44

The proposed PES takes into account the Actions proposed by the national strategy and will include in the environmental management program that will adopt the need to save energy which is also a compensation for the causes of Climate Change. Especially the planning of the PES with the achieved saving of water resources (irrigation with treated sewage and water supply mainly with desalination of sea water) contributes significantly to the reduction of the climate risk as it is foreseen in the ESPKA of the South Aegean.

One of the few specific reports, the one about water supply mainly with desalination, is negated by the facts and specifically by the investor's request to DEYAP for the drainage of all water supply water from the Municipal Enterprise.

p. 3-46

The proposed PES takes into account the Actions proposed by the said strategic plan and will include in the environmental management program that will adopt the need to save energy and improve the climate. Meanwhile, chapter 3.3 mentions the objectives of the Spatial Planning Frameworks directly or indirectly contrary to the PES and the planned investment. E.g.

p. 3-49

Preservation of local characteristics and „local color“ with priority in the regeneration of old settlements located near the coasts.

Avoiding siting close to the beach of facilities that do not require proximity to the sea as well as avoiding very large-scale facilities.

Protection, promotion and restoration of the natural, built and cultural environment of the islands.

p. 3-57

Tourism: The special geographical location and geomorphological composition of the area, combined with the mild climatic conditions, the cultural heritage and tradition of the islands and the high quality of the natural and man-made environment constitute the main endogenous factors that attract and will continue to attract the visitor interest. According to the emerging demand trends, the Greek islands of the Aegean have the potential and must be the main poles of attraction and destination for the new tourist flows and the offer of new tourist products. The strategy of exploiting the available tourist resources is obliged to take into account the negative effects on the natural environment, which entails the concentration of tourist activity in specific geographical areas and in a limited period of time.

The overconcentration of tourism on certain islands leads to the need for rational management of the already limited water resources and effective treatment of the negative effects on the natural and man-made environment.

p. 3-60

Based on employment and the „dynamism“ of tourist activity, the Prefecture of Cyclades includes most of the „saturated tourist areas (STAs)“ of Zone A: Quality Upgrade Areas of Intensive Tourist Activities of the South Aegean Region.

p. 3-65

Limiting the establishment of new hotel infrastructures and the increase of beds, by applying strict sustainability criteria for new businesses and controlling the way they are built and the degree of their development (size, scale, category, quality).

3. Reference to Bearing Capacity

In chapter 3.4, which refers to the carrying capacity of the study area, it was calculated using two different methods, in order to reach the conclusion that the planned development according to the PES does not bring substantial changes to the carrying capacity indicators in the Naoussa District, i.e. it does not worsen the situation, in terms of spatial and social indicators, and that the Naoussa DC will have a lower carrying capacity depletion compared to reference areas examined by the study.

At this point the following comments should be made:

- The carrying capacity indicators have been compared with areas with very intensive tourism development, such as Mykonos, Santorini, Rhodes and Kos, which are anything but examples of sustainable tourism development, with which the model is said to be compatible EPS development plan. Why is there no comparison with islands with milder development, such as Sifnos or Tinos, which are distinguished by the high level of tourist services and visitors, which we supposedly wish to attract?
- The assessment of carrying capacity based on certain indicators related to the number of accommodation beds, vacationers and buildings is fragmentary and distorting. It is known that much more sophisticated tools have been developed to estimate carrying capacity and its limits based on a much wider framework of parameters, which take into account among other things the very important issues of natural resources and public infrastructure of each place.

In short, the treatment of the carrying capacity issue in the context of the PES is considered partial and piecemeal and biased towards proving that the development of the PES will not burden the situation in the area of interest.

4. Comments on the Development Plan

Chapter 4 describes the development plan based on the PES. In this chapter:

- It is mentioned that *the protected known ancient immovable monuments (Mycenaean Acropolis of Koukounaria, Proto-Cycladic Cemetery in Plastira Bay, „Leivadera“ site, „Diakofto“ site, monastery of Agios Ioannis Detis) that exist within the boundaries of the declared archaeological site are not only outside of the boundaries of the intervention area, but outside the total property, at a significant distance from it (greater than 800m.) and without any visual contact.* The report is not true regarding its last part, since, as it appears from the negative opinion of the Ephorate of Antiquities of Cyclades, there is visual contact of part of the area with the most important archaeological element of the area, the Acropolis of Koukounaria. There is also no mention at all of the visual contact of the entire area with another important newer monument, the Lighthouse of Kavο-Korakas at the NW end of Paros.
- *On p. 4-84 it is stated that The spatial organization and development of the intervention area within the context of the PES under study is done in a documented manner based on the carrying capacity of the area without at the same time overturning the spatial planning function of the wider area.* The reference to the carrying capacity of the area has already been commented on above. The zoning function of the wider area will be greatly affected due to the expected significant traffic burden, as mentioned below, and the great pressure that will be exerted on the existing infrastructures (water supply, drainage, waste collection).
- *On pg. 4-85, the building conditions are described in XE 1. It mentions the possibility of building a second floor in the buildings of the development up to a percentage of 30% of the total built-up area. This choice is not compatible with the declarations of soft development and non-intervention in the landscape. After all, the GIS of Paros allows only one-story buildings in this area. It is also not clear whether the term built surface also means the basements which, as is known, are constructed beyond the building factors determined on a case-by-case basis. In this case, the construction of the second floor will be 60% of the surface of the ground floor parts of the buildings.*
- *On page 4-88 it is stated that the use of renewable energy sources (RES) is recommended to cover the energy needs of the units and their supporting infrastructure (eg desalination unit, heating-cooling of buildings, etc.).* The recommendation of SMPE for the use of renewable energy sources does not create a commitment for their use.
- *On p. 4-89 the annual water demand is calculated at approximately 72,000 m³. and this quantity has been requested to be drained from the DEYAP network. Today, the total annual production of drinking water by DEVAP is 2,850,000 m³. Therefore, the demand is about 2.5% of the annual production, a not inconsiderable percentage when it comes to a tourist facility.*
- *Chapter 4.4 assesses the effects of the PES. There it is estimated that the implementation of the PES will contribute positively, among others:*
 - » In the optimal application of the local regulations of the GIS of Paros, when it exceeds the conditions stipulated by it for the region.
 - » Limiting and discouraging arbitrary and scattered off-plan building, when based on the current conditions such building is not possible in the area.
 - » In the promotion of alternative forms of tourism, when this does not arise out of nowhere, while on the contrary it concerns a conventional tourist investment.
 - » In balanced development through the creation of new destinations outside the tourist saturated ones. This claim cannot apply to Paros and the area of Kolympithra.
 - » Ensuring the protection, promotion and sustainability of the natural resources of the area through the development of modern environmental protection and monitoring systems (low densities, reduced building factors, tertiary wastewater treatment, water and energy conservation, recyclable materials separation system, fire protection projects, etc.). The mentioned environmental protection and monitoring systems are necessary but in no case necessary conditions in order to refer to the development of sustainable tourism.

5. Comments on Alternative Solutions

The EIA presents three alternatives in chapter 5:

- *The first is the development of the area based on the existing status of the GIS.*
- *The second is the one proposed by the EPS, which is recommended for adoption.*
- *The third is the ESCHASE application-based one*

The following comments are made on the alternatives:

- The first of the alternatives is meaningless in terms of its applicability. The absence of a recognized road network in the area of the property, as well as any justification as to the possibility of developing one in the future, makes it impossible, due to the existing legislation, to divide the property and therefore its residential or tourist development based on the generally applicable conditions of GIS Paros. In practice the first alternative is identical to what should be considered in the EIA as a zero solution, which is the solution of doing absolutely nothing in the area, and is not even mentioned. Such a solution would only have advantages for the landscape, the environment, the carrying capacity, the infrastructure and absolutely no disadvantage, apart from of course the financial loss of the investors who bought the property.
- The third alternative solution is rejected due to the fact that its implementation leads to a maximum construction of 46,395 sq.m., compared to 12,046 sq.m. of the second and proposed. This development is assessed as short-lived and unsustainable. It is even stated that: *The viability of a plan, program, etc. it ceases to exist when the material basis on which it rests - in this case the primary tourist offer which is composed of the unique and valuable natural and cultural resources of the region - will have been largely altered.* Obviously the construction of 46,395 sq.m. is much more unfavorable for the environment and the resources of the area than the construction of 12,046 sq.m. But it is not documented in any way and no quantitative or qualitative evidence why one development is considered sustainable and the other unsustainable. It is even interesting to apply the large growth scenario to the carrying capacity indicators of chapter 3.4 to find that acceptable values are obtained for it as well, characteristic of the problematic reliability of the used carrying capacity analysis.

In addition to the aforementioned in chapter 5, some inaccurate references are made. Specifically:

p. 5-100

With the current urban planning regime in the intervention area (GPS of the Municipality of Paros) houses (part outside the ZOE) and campsites (part inside the ZOE) could be built. These interventions usually concern low-quality facilities.

This is inaccurate, it is even mentioned in several parts of the SMPE (eg 5-106). The truth is that in the area there are usually already high-quality hotel units (Porto Paros, Astir of Paros, Saint Andrea) and residences. Therefore, the area is anything but degraded and is considered one of the most attractive of Paros.

p. 5-101

In the framework of the PES, the spatial development of 2 distinct Spatial Units (SE) within the property is foreseen with specific land uses and conditions, building control restrictions per SE taking into account the applicable spatial and urban planning regulations, the special natural and cultural environment and the carrying capacity of the operation area.

The applicable zoning and town planning regulations are not taken into account in most of the property but special conditions are proposed based on the PES. The reference that the natural and cultural environment and carrying capacity are taken into account is not specified in a concrete way and is rhetorical.

p. 5-106

The implementation of Scenario B is expected to positively affect the protection of the population, social cohesion and human health, the attraction of the population to the area, will provide jobs, will significantly contribute to the rise of the educational and living standards as well as the environmental awareness of the residents Island's.

Apart from the possible creation of jobs, it is incomprehensible how the investment will positively affect all other dimensions.

Ultimately, Scenario B is an investment with great financial viability. It will have positive effects on GDP, employment, the reduction of intra-regional disparities and the balanced development of the region in general with a shift to milder alternative forms of tourism.

As above, general reports without any possibility of substantiation.