Administrative Law Briefing: Special Edition

The New Special Spatial Planning Framework for Tourism: Key Takeaways for Investors and Businesses

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On 11 May 2026, the new draft Special Spatial Planning Framework for Tourism (**EChP-T**), in the form of a Joint Ministerial Decision (*KYA*), has been placed on public consultation until 25 May 2026.

Greece lacked an operative spatial planning framework for tourism for many years since the Council of State annulled the previous 2009 framework on procedural grounds. The new EChP-T fills this institutional gap during a period in which tourism receipts reached a record €23.63bn in 2025.

According to the relevant announcement of the Ministry of Environment and Energy, the aim of the EChP-T is to ensure that tourism development takes place in a more organized and sustainable manner, while protecting the natural environment, local communities and the unique character of each region.

The provisions of the EChP-T do not apply to licensing procedures for tourist facilities that are already underway as of the date of its publication, once officially issued, provided that the relevant necessary documents have been duly submitted to the competent authority by that date (eg a complete Environmental Impact Assessment (EIA/MPE) file for the issuance of an Environmental Terms Approval (AEPO)).

A. Five-Zone Classification of the National Territory

The EChP-T classifies the national territory (1.035 municipal units) into 5 categories based on tourism intensity (beds per area and permanent population), the characteristics of each region and their specific protection status, as follows:

1. Category A Controlled Development Areas: Areas of very high tourism saturation (including parts of Mykonos, Santorini, Rhodes, Zakynthos and Crete):
    a. priority is given to the upgrade and modernization of existing accommodation;
    b. stricter terms are provided for the creation of new tourist units;
    c. until land uses are determined through first-level urban planning tools in the land outside the approved town plan (outside-plan areas), the minimum area required for new outside-plan hotels is set at 16 acres;
    d. construction of only 3-, 4- and 5-star/keys new tourist accommodation or extension of such existing accommodation is permitted;
    e. for the islands in this category, a cap of 100 beds for new tourist accommodation is provided.
2. Category B Developed Areas: Emphasis is placed on quality improvement but with milder restrictions:
    a. until land uses are determined through first-level urban planning tools in the outside-plan areas, the minimum area required for new outside-plan hotels is set at 12 acres;
    b. construction of only 3-, 4- and 5-star/keys new tourist accommodation or extension of such existing accommodation is permitted;
    c. for the islands in this category, a cap of 350 beds for new tourist accommodation is provided.
3. Category C Developing Areas: Greater scope for the development of new tourist activities and accommodation for the gradual enhancement of the tourism product:
    a. until land uses are determined through first-level urban planning tools in the outside-plan areas, the minimum area required for new outside-plan hotels is set at 8 acres;
    b. construction of only 3-, 4- and 5-star/keys new tourist accommodation or extension of such existing accommodation is permitted.
4. Category D Early Development Areas: Emphasis on moderate development of new destinations and exploitation of the special characteristics of each region:

a. until land uses are determined through first-level urban planning tools in the outside-plan areas, the minimum area required for new outside-plan hotels is set at 8 acres;

b. construction of only 2-, 3-, 4- and 5-star/keys new tourist accommodation or extension of such existing accommodation is permitted.

5. **Category E Special Development Enhancement Areas**: These mainly concern special forms of tourism, such as mountain, spa, marine or diving tourism. Until land uses are determined through first-level urban planning tools in the outside-plan areas, the minimum area required for new outside-plan hotels is set at 8 acres.

Regional Spatial Plans (**RSP**s) may amend the classification level of a municipal unit by no more than one grade, provided that this is justified by the findings of the RSP analysis.

B. Island-Specific Regime

The islands (excluding Crete and Evia) are further classified into three groups by area:

1. **Group I**: Islands larger than 250 km² (eg Rhodes, Corfu, Kos, Lesvos): where there is an Organised Receptor of Tourist Activities (**OYTD**), only mild development is permitted, except for Rhodes and Corfu.
2. **Group II:** Islands between 20 and 250 km² (eg Mykonos, Santorini, Paros): construction of only 3-, 4- and 5-star new accommodation, with a cap of 100 beds; only mild development OYTDs are permitted.
3. **Group III:** Islands below 20 km²: construction of only 3-, 4- and 5-star new accommodation, with a cap of 100 beds; only mild development OYTDs are permitted; on islands under 1,000 acres further limitations apply.

In the event of any conflict between the directions and regulations of the EChP-T for a certain area, the provisions that are more restrictive on development and more supportive of the environment and the landscape shall prevail.

C. Coastal Zone Protection

A full prohibition on construction and ground-shaping works applies between 0 to 25 meters from the coastline, with exceptions only for disability access, ambulance routes and works under the Greek Law on the seashore and the beaches[1]. It is also recommended that establishment in the coastal zone of new facilities/uses classified as A1 and A2 in terms of environmental impact, which are incompatible with tourism, are restricted, except for specified derogations.

[1] Law 2971/2001 as in force.

D. Short-Term Leases

The EChP-T empowers future legislative and regulatory measures on short-term leases, including geographic prohibition or restriction zones, annual duration limits, conditions linked to primary residence use and restrictions on the development of new short-term rental properties, particularly in areas experiencing high demand or with specific geographical characteristics, including newly constructed residential properties. These provisions do not have immediate effect but will require implementing legislation or regulations.

E. Renewable Energy Sources (RES)

Within Category A and Category B areas and the Group II islands, or those designated by level A urban planning as priority areas for tourism, RES development is permitted exclusively for self-consumption, subject to the provisions of the Special Spatial Planning Framework for RES (SSPF RES).

In all areas with tourism priority, and in particular within the areas and islands referred to above, a controlled concentration of renewable energy sources is recommended, without precluding their combination with the development of tourist facilities, under the conditions set forth in the SSPF RES. In addition, the use of RES should be promoted for meeting the energy needs of tourism facilities and their supporting infrastructure (eg desalination plants).

F. Other Provisions

As a direction requiring implementing legislation, a dedicated green levy in favor of the Green Fund is envisaged for tourism activities (including short-term leases) in Categories A, B and C, to finance urban regeneration and tourism infrastructure. Carrying Capacity Assessments (EkEFI) are required for individual tourism units:

1. exceeding 50 beds in municipalities with fewer than 3k inhabitants and in municipalities falling under Categories A, B and C; or
2. exceeding 150 beds in larger municipalities and in municipalities falling under all Categories.

In cases where spatial planning takes place in a municipal unit with an already approved urban plan that incorporates EkEFI, it must be demonstrated either that the new facility does not exceed the specified critical indicators, or it must be justified, based on scientific criteria, that the additional impact does not substantially alter the basic parameters of the existing EkEFI.

For Categories A and B, another direction is introduced. Until land uses are determined through first-level urban planning tools in the outside-plan areas[2], the establishment of new activities and

[2] as they are defined under art. 32 (1) of Law 4759/2020.

uses with a significant environmental impact[3] is limited, where such activities are not compatible with tourism activity.

G. Relation to Other Plans

The regulations of the EChP-T are binding on RSPs and Maritime Spatial Plans, which should also be in line with the EChP-T's directions. A revision or amendment of the RSPs may be required to repeal or restate provisions that conflict with the EChP-T and until such amendments are made, the guidelines/regulations of the EChP-T supersede any contrary provision of the RSPs.

Local Urban Plans and Special Urban Plans should also align with the directions of the EChP-T. In general, the subordinate planning instruments are bound by the EChP-T.

Regulations established by first-level urban planning instruments or special decrees that impose stricter building conditions or use restrictions prevail over the EChP-T provisions.

The EChP-T provisions do not apply to projects and activities within approved OYTDs, Tourist Complexes (STK), Special Urban Plans (EPS) that are not prepared at the municipal or municipal unit level, Integrated Development Plans and plans under Article 8(7) of the Greek law on spatial planning and sustainable development[4], which concerns plans such as POTA, ESXADA and ESXASE.

[3] falling within Category A of the environmental licensing/classification system.
[4] Law 4447/2016.



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