



Submission from East Mayo Greenway Group to Mayo County Council (hereafter MCC) in regard to the Material Amendments Draft Mayo County Development Plan 2021-2027

April 20th 2022

This submission is being made on behalf of the 1706 members of the East Mayo Greenway Group (hereafter EMGG). We would remind the council of the obligation to address all the key arguments contained in this submission in detail.

East Mayo Greenway Group. The East Mayo Greenway Group made a comprehensive submission on behalf of its members in March 2021 on the first draft county plan, details about the group membership are contained in the original submission. Since that submission EMGG registered as a formal community group with Mayo County Council as part of the Public Participation Network, being part of the PPN places the group on a level of recognized community status with MCC.

EMGG is highly representative of public opinion in East Mayo with over 1700 members. Membership of the group is primarily Mayo residents or diaspora who have a close association with East Mayo living in Ireland and overseas.

Summary of this submission.

This submission makes the following key arguments which are expanded in detail in section 4.0:

- Mayo county council the Ox Mountain Greenway proposal and need for full co-operation of Sligo County Council for MTO6
- MTO6 displays little to no acknowledgement or integrated thinking in regard to the Sligo Greenway plans from Sligo County Council
- MTO6 and the public consultation process and how submissions were dealt with.
- MTO6: Blocking a greenway on the closed railway route from being considered in a feasibility study goes beyond the limits of the authority of MCC
- New All island strategic rail review: All options have to be left open. MTO6 does not leave all options open and has to wait for the outcome of rail review before any decisions on closed railway can be made
- MTO6 contravenes Government guidelines on drafting county plans
- MTO6 presents a prejudiced view based on the factual evidence of how MCC has acted on other community based projects to utilise the closed railway north of Claremorris for recreational purposes until such time as a railway is possible Case Citation: Velorail and Greenway proving prejudice by MCC in MTO6

Each of these points above is examined in detail in this submission in regard to MT06

2 Material Amendments Draft Mayo County Development Plan 2021-2027

The East Mayo Greenway Group is making this submission on the material changes to the county plan and the manner in which the group has been treated by the council members and executive in regard to the submissions made on the county plan advocating a greenway on the closed railway.

Amendment MTO 6 is totally unacceptable to EMGG and will not be accepted as it stands.

3. MTO 6 and why it must change.

EMGG does not accept the recommendations of MTO 6. MTO6 shows an extreme level of prejudice against the East Mayo Greenway campaign which is not acceptable

MTO6 displays a systematic, institutionalized bias against the Community led East Mayo Greenway Campaign to grow the tourism economy in East Mayo with the creation of the East Mayo Greenway.

EMGG does not accept the dismissal of the arguments put forward for a greenway on the closed railway by MCC through MTO6.

3.1 What MTO 6 states:

MTO 6: To support the establishment of a network of interlinked cycle ways and walk ways in the county and the adjoining counties and specifically to support the development of a link between the Great Northern Greenway and the Great Western Greenway, having regard to best practice standards including the Design Manual for Urban Roads and Streets and the NTA Cycle Manual and the TII Standard DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads or any amending/superseding national guidance or manuals. To specifically conduct a feasibility study for the development of a Greenway linking the Great Northern Greenway at Collooney to the Great Western Greenway via the high amenity areas of the Ox mountains, with a link point to the Ballina - Castlebar - Westport interurban Greenway at Foxford, Co. Mayo. That the Western Rail Corridor (WRC) is protected and preserved for the delivery of Rail Infrastructure to develop the region and is excluded from any feasibility study for the WRC.

By writing into the county plan that the closed railway will not even be considered as part of any Sligo to Mayo greenway feasibility study, MTO6 effectively writes off the agenda in the county plan. This is totally unacceptable. It represents prejudiced decision making which displays poor governance it fails to grasp the realities of the situation for the following reasons:

4.0 Arguments for the amendment or total dismissal of MTO6

4.1 Mayo county council the Ox Mountain Greenway proposal and need for full co-operation of Sligo County Council for MTO6

Key points for discussion

1. MTO6 proposes that a greenway should be considered to connect Collooney county Sligo with East Mayo (Ballina) via a greenway across the high amenity area of the Ox mountains and is proposing a feasibility study for this project.
2. EMGG note that there is no mention of Sligo County Council (SCC) in MTO6. EMGG question why MTO6 does not mention SCC as the proposed greenway route will start in County Sligo and cross the Sligo/Mayo border somewhere on the high amenity area of the Ox Mountains.

3. MTO6 will require co-operation and agreement of SCC, as it will need a joint application for funding and planning between SCC and MCC for the proposed greenway across the Ox Mountains

Argument for change: If MCC do not have the approval and full co-operation of SCC in writing and full agreement prior to the county plan being finalised there is no point placing such an idea in the county plan. It is a pointless exercise to write into the county plan without prior agreement with SCC.

MCC does not have the authority to make a decision on the matter of a greenway that will start in county Sligo. MCC is going beyond the limits of its authority on this matter as it stands is MTO6 invalid.

To validate MTO6 and to retain the idea for a greenway starting in Collooney and crossing the high amenity land of the Ox Mountains, MTO6 needs changing to say *“Mayo county council will seek to co-operate with Sligo County council to undertake a feasibility study for a greenway from Collooney to the Great Western Greenway via the high amenity areas of the Ox Mountains”*

Other parts of the wording of MTO6 need changing as well.

4.2 MTO6 displays little to no acknowledgement or integrated thinking in regard to the Sligo Greenway plans from Sligo County Council

1. MCC is hereby notified by EMGG that SCC is in the advanced stages of planning a greenway on the route of the closed railway from Collooney in county Sligo to Bellaghy Charlestown on the Sligo/Mayo county border. MCC will we are sure be familiar with this fact.
2. MTO6 has been written as if MCC is unaware of what is going on in the next county.
3. EMGG is placing MCC on notice that MTO6 has taken no consideration of the work by SCC to create the Sligo Greenway from Collooney to Charlestown. The intent of SCC to create the Sligo Greenway must be acknowledged in MTO6.
4. MCC is placed on notice that the Sligo Greenway project has the full support of both Irish Rail and The Department and Minister of Transport.

Argument for change On this basis it has to be assumed that it is highly unlikely that SCC will engage in the idea of creating a greenway from Collooney to County Mayo across the high amenity area of the Ox Mountains. The Sligo Greenway will deliver a greenway connecting Sligo and Mayo utilising the closed railway route from Collooney to Charlestown at a far more efficient cost.

The proposal for a greenway across the top of the Ox Mountains may be well meaning, however MCC does not have the authority to propose infrastructure projects that will start in another county and to embed that idea in a policy objective is meaningless.

The proposal for a greenway across the Ox Mountains has not been well thought through and takes no consideration of the fact that SCC is fully committed to the Sligo Greenway. It is reasonable to assume that SCC is unlikely to support an alternative Sligo/Mayo Greenway over the Ox Mountains at a much higher cost than utilizing the closed railway which SCC is fully committed to.

4.3 MTO6 and the public consultation process and how submissions were dealt with.

Key points for discussion

1. Revisions to the county plan should reflect the public consultation that took place in 2021. As far as we can ascertain there was not a single submission from the public that suggested a greenway across the Ox Mountains to connecting the two counties.
2. MCC received 994 submissions suggesting a greenway on the closed railway north of Claremorris, this accounted for almost 80% of all submissions received. MCC has given this

idea no real consideration. MCC received submissions from the landowner, Irish Rail and The Department of Transport endorsing a greenway on the closed railway north of Claremorris.

3. MTO6 wilfully seeks to block the idea of a greenway on the closed railway, the option supported by Irish Rail and the Department of Transport by stating that any feasibility study on a greenway connecting the two counties, Sligo and Mayo, should not even consider the closed railway route.

Argument for change: It is clear and obvious the precedent to build a greenway on the so called Western Rail Corridor has been set by SCC. SCC actually wrote this idea into the Sligo County plan.

Sligo county plan: O-CW-5 Seek the development of a footway and cycleway (greenway) on or alongside the closed railway line from Collooney to Bellaghy (Sligo/Mayo county boundary) insofar as such route does not compromise the reopening of the Western Rail Corridor, if reopening the railway line is deemed feasible

Despite all the clear evidence about the merits of utilising the closed railway north of Claremorris as a greenway until such time as a railway is possible, an idea adopted by SCC in the Sligo county plan (see above), and supported in submissions MCC received from both Irish Rail and the Department of Transport and 994 submissions on the county plan; MTO6 actually writes into the county plan that the closed railway known as the Western Rail Corridor is to be omitted from even been considered as a greenway in any feasibility study. This is totally unacceptable.

The idea contained in MTO6 takes no cognisance of 80% of the submissions on the county plan, in fact, it seeks to oppose the position taken by 80% of submissions received on the county plan and what the general public appear to want. In the opinion of EMGG MCC with MTO6 has placed itself in direct conflict with the consultation process with the general public and public opinion in East Mayo.

A pattern is emerging based on the previous county plan and submissions received asking for a greenway on the closed railway on that plan. MCC is taking an extreme stance on this matter acting in a prejudicial manner against the idea that a greenway is a plausible and an acceptable use of the closed railway until such time as a railway is possible.

There is no rational reason for a public authority to act in such an extreme manner, against the thinking and wishes of the general public and **deliberately refuse any semblance of compromise**. MCC has chosen in MTO6 to offend the views of 80% of those members of the public which made submissions on the county plan.

The owner of the closed railway Irish Rail, and The Department of Transport made submissions endorsing the idea of greenway on the closed railway north of Claremorris but under the auspices of MTO6 MCC has taken an extreme stance to oppose both Irish Rail and the Department of Transport submissions.

Jim Meade the CEO of Irish Rail said this at an OIR Transport committee meeting in February 2021: *“We always support greenways and there is a caveat on any greenway license we have out there that if there is a requirement there from the department.”* Mr Meade continued *“the greenway is a win win I think for both because it keeps the asset in state ownership, it keeps the asset utilized and then if there is a decision at some time in the future that it has to go back into public transport mode, the licensing arrangement is such that it can do so.”*

All of the evidence, including Mr. Meades comments in February 2021 have been presented to MCC under countless submissions from many parties. Despite all of this evidence, MCC has continued to show a diehard view on this matter of extreme intransigence that defies any logical explanation apart from an inbuilt irrational institutional prejudice against a greenway on the closed railway

which has materialised in MTO6. It appears MCC will try and stop a greenway on the closed railway at all costs and without any justifiable reason or explanation to the public it serves

4.4 **MTO6: Blocking a greenway on the closed railway route from being considered in a feasibility study goes beyond the limits of the authority of MCC**

Key points for discussion

1. The recommendation of MTO6 that states a greenway cannot even be considered on the closed railway **goes beyond the limits of the authority of MCC.**
2. MCC has continually denied the opportunity for the people of East Mayo to benefit from a long distance greenway on the closed railway from Charlestown to Claremorris and the economic benefits it will bring East Mayo. The previous county plan had contained the in-built prejudice of MCC against the greenway idea into the county plan 2013 – 2020 on the premise that the Western Rail Corridor was going to be opened.
3. During the period 2013 – 2020 the railway north of Athenry in County Galway was not re-opened and obviously the railway north of Claremorris has not been re-opened. EMGG predicts with confidence that during the course of this plan under review the railway north of Claremorris will not be re-opened before 2027. During the period of two county plans which both received overwhelming public support for a greenway on the closed railway north of Claremorris nothing will have happened apart from the denial to the people of East Mayo to benefit from the untold economic benefits a greenway would bring to the East Mayo area.

Argument for change: MCC has blocked the idea of a greenway being placed on this route based on a mis-interpretation of the National Development Plan and the Regional Spatial Economic Strategies and new policies that have emerged since the county plan was drafted. MTO6 is seeking to embed blocking the consideration of a greenway on the closed railway north of Claremorris as a matter of extreme prejudice against the East Mayo Greenway Group.

Understanding what these two policy documents actually say about the so called Western Rail Corridor is pivotal to try and understand the institutional prejudice contained in the county plan against the EMGG as proposed in MTO6.

At no point in the current National Development Plan Ireland 2040 is there any commitment to re-open the Western Rail Corridor. There was a commitment to undertake an economic review of the railway viability but only from Athenry to Claremorris.

The first regional planning objective for railways in the RSES is RPO 6.11 refers to the economic review that needed to be undertaken as part of the NDP.

RPO 6.11: To seek commencement and completion of the review of the Western Rail Corridor project as a priority for passenger and freight transport.

The deliverable of RPO 6.11 was completed with the delivery of reports by EY Consulting and JASPERS (European Central Bank) in January 2021. The findings of these reports, as deliverables of both the National Development plan and the Regional Spatial Economic Strategies need to be accepted by the county councils covered by the North West Regional Assembly area.

The independent reviews were also a deliverable of the National Development Plan Ireland 2040 which stated on page 42 of the National Development Plan (with reference to the closed railway from Athenry to Tuam and Tuam to Claremorris) the following statement: *“Programme for*

Government, an independent review will be undertaken immediately. If the findings of the review are approved by Government, the project will be prioritised during this plan.”

The conclusions of both the EY Report and the JASPERS report delivered under RSES RPO 6.11 and the NDP are both unequivocal. The conclusions of these reports now have to be accepted as part of both the Regional plans and the county plans in the NWRA region. The reports did not even consider nor examine the route north of Claremorris towards Charlestown.

MCC have failed to understand the meaning of RSES RPO 6.11 which only committed to delivery of the review of the Western Rail Corridor project which was completed and delivered, the delivery of those reports was not a promise to rebuild the railway. This argument will be expanded in 4.5 below.

4.5 New All island strategic rail review: All options have to be left open. MTO6 does not leave all options open and has to wait for the outcome of rail review before any decisions on closed railway can be made.

Key points for discussion

1. Since the delivery of the Western Rail Corridor Review, an additional issue has been raised, which in effect supersedes the NDP and the RSES. Everything now hinges on the national rail review and this has been recognised and fully accepted by MCC.
2. The Government along with the NI administration has appointed ARUP consulting to conduct an “All Island” Rail Review. The MCC CE report on submissions on the new county plan refers to this report on page 165 of said report, Item 1. 2 in which the following is stated.
3. *“However, a further all-island study as part of DoT Dfi(NI) is proposed to formulate an all-island strategy for the future of rail on the island and Irish Rail state that they will support the outcomes of the study when completed.”*
4. The CE report concludes in this paragraph *“Definition of use remains undermined until such time as the All-Island Rail Review has been completed and accepted by Government”*
5. The Chief Executive of MCC has clearly stated that the definition of use of the closed railway remains undermined until the all island rail review is completed.
6. MTO6 contradicts the statement made by the CE of MCC by stating the following in reference to any greenway feasibility study.
7. *MTO 6 “That the Western Rail Corridor (WRC) is protected and preserved for the delivery of Rail Infrastructure to develop the region and is excluded from any feasibility study for the WRC.”*

Argument for change: MTO6 in effect is presuming the outcome of the “all island” national rail review currently underway by assuming the closed railway will get the go ahead. It may do. It may not. The national rail review may say an alternative route needs to be found or it may say north of Claremorris needs to be preserved in public ownership and a greenway is a good option. None of us know the outcome of the all island rail review.

It is not within the remit of MCC to decide on the outcome of the Rail Review, all options must remain open, MTO6 does not leave all options open and therefore has to be amended.

MCC cannot make the decision that the closed railway is preserved for the delivery of rail infrastructure only; That will be the decision of the rail review, to decide otherwise is a prejudiced decision against other strategic options which MCC is not allowed to do under the guidelines MCC has to follow in drafting the county plan, see next point of argument 4.6.

4.6 MTO6 contravenes Government guidelines on drafting county plans

Key point of discussion

1. Here is a direct quote from page 73 of the above guidelines *“It is recommended that the following stages be completed to inform the pre-draft consultation process: • Survey and analysis, • Identification of issues, • Preliminary identification of options and • Preliminary scoping of the environmental report. However, none of this preparatory work should be carried to such a level as to prejudice (or appear to prejudice) the initial consultation phase; **strategic options must remain open.**”*

Argument for change: The above quote from the government guidelines on producing county plans is relevant to MTO6. The phrase *“**strategic options must remain open**”* is critical even though this quote equates to the pre-planning stages. During this planning process MCC has never given any credence to the idea of a greenway on the closed railway north of Claremorris. The strategic option for the closed railway to be a greenway until such time as a railway is possible has never been considered in the Mayo County Plan, however it must remain open in order to comply with guidelines for drafting county plans.

It is an option proposed by Irish Rail and the Department of Transport, it is an option which the Sligo Greenway will de-facto present MCC with and it is an option upon which MCC received almost one thousand submissions on in the county plan.

MCC with MTO6 now seeks to formally remove the strategic option of a greenway on the closed railway, probably under the assumption the all island rail review will commit to the closed railway north of Claremorris re-opening anytime soon.

MCC does not have the authority to assume the outcome of the rail review and under the guidelines on drafting county plans MCC must leave all strategic options, including a greenway until such time as a railway is possible open.

On this basis MTO6 clearly contravenes the guidelines for drafting county plans as MCC is legally obliged to leave all strategic options open, including a greenway. MTO6 must be amended for this reason or it will render the county plan invalid.

4.7 MTO6 presents a prejudiced view based on the factual evidence of how MCC has acted on other community based projects to utilise the closed railway north of Claremorris for recreational purposes until such time as a railway is possible

Case Citation: Velorail and Greenway proving prejudice by MCC in MTO6:

Key points of discussion

1. The Department of Rural and Community Affairs has given significant support to a community project promoted by Mayo County Council to develop a Velorail on the closed railway at Kiltimagh for 13 km. The funding for this project was applied for by MCC and so far amounts

to circa half a million Euro received in three different tranches of grants. Supporting the Velorail and taking a prejudicial stance against the concept of a greenway on the remaining parts of the closed railway displays an extreme case of prejudice in favour of one community sponsored idea to use the closed railway for leisure purposes against another with a different idea. This prejudice has no rational reason apart from an in-built institutional bias against the greenway idea by MCC.

2. The velorail using the redundant railway tracks will protect the alignment of the closed railway in the same way as a greenway would, this is an accepted fact.
3. MCC are fully aware the closed old railway tracks the velorail will run on, are not fit for purpose as a modern railway and would have to be ripped up and replaced as new should a railway ever be rebuilt on the route. This is a well-documented fact which should be accepted by MCC at this stage. The velorail does no more to protect the route in public ownership than a greenway would this is an accepted fact at least it is by the owners of the route, Irish Rail, denying this fact is no longer an option for MCC.
4. There is no valid argument that the Velorail is running on tracks that might be used again for a modern railway they are only fit for scrap in terms of a modern railway again a fact known to MCC and within the public domain.

Argument for change: The velorail and a greenway serve the same function as far as Irish Rail is concerned, protecting the route in public ownership should a railway ever be re-built. Irish Rail provided a similar license arrangement for the Velorail in 2015 as they have for greenway projects on closed railway routes, to protect alignments for potential future rail use. Irish Rail have stated as a matter of public record that greenways protect closed railway routes. MCC are well aware of these facts and are well aware of the public position of Irish Rail on the use of greenways to protect closed railway routes in public ownership.

The two ideas have to be treated with equal merit; **no prejudice should be shown in favour of one idea over the other they both protect the closed railway route for the benefit of their communities until such time as railway is possible, this is a fact.**

The prejudice that is so apparent in MTO6 against a greenway on the closed railway even been considered in a feasibility study would leave the county plan open to challenges, either legal, referral to the Department of Local Government or the Ombudsman.

In MTO6 MCC have taken an extreme stance and shown extreme prejudice against the idea of a greenway using the route at any time. On the other hand, MCC accept that a velorail can use the route for leisure purposes until such time as a railway is possible.

By supporting the Velorail, MCC has established a legal precedent that MCC is prepared to release the route or sections of it for leisure purposes. This stance has the support of Irish Rail which granted the license for the Velorail on 13 km of the closed railway in 2015 for a period of 12 years. Equally Irish Rail have accepted a Greenway achieves the same objective and made this abundantly clear in a submission on the county plan and in public statements referred to beforehand.

In the original application for funding for the velorail project submitted by MCC to the Department of Rural and community affairs in 2015 item 2.10 of the submission document authored by Padraic Philbin senior executive engineer with MCC stated this:

2.10: A licence to operate a velorail on a section of the Western Rail Corridor was signed by Mayo County Council, Irish Rail, Coras Iompair Eireann on 1 April 2015 and covers a period of 12 years. The Velorail is a partnership between Kiltimagh Tourism Association and Mayo County Council. It is accepted by Kiltimagh Tourism Association and Mayo County Council that the Velorail Project is being undertaken on a temporary basis and will terminate should Irish Rail reinstate train operations.

There are clear issues contained in this original submission made for Velorail funding by MCC that are pertinent to the argument that Velorail and Greenway need to be treated equally and if they are not MCC is acting in a prejudiced.

The velorail licence will run until 2027 and will coincide with the term of this county plan. If a velorail licence can coincide with this county plan in terms of timing, then so can a greenway licence from say Charlestown to Swinford. The fact that a licence was agreed until 2027 clearly shows there is no short term plan on the part of Irish rail to reinstate train operations on that stretch of railway.

It is fully accepted by all parties, MCC, EMGG, Kiltimagh Tourism Association and Kiltimagh IRD that if the route is being licensed on a temporary basis and a railway on the route is required in the future, the railway will take precedence. It is a well-established fact if train operations were to be reinstated an entirely new track would have to be laid down, so the velorail protects the route in public ownership in the same way as a greenway does.

The exact same argument and modus operandi would apply to a greenway license.

MCC cannot support one community initiative and idea, like the velorail, and deliberately and wilfully oppose another such as the greenway, that is prejudicial. A greenway on other parts of the closed railway, for example from Charlestown to Swinford cannot be opposed by MCC as MCC has supported the Velorail on another part of the closed railway.

MCC cannot act in a systemic prejudiced manner against one community group and work in co-operation with another to protect the route until such time as a railway might be possible.

EMGG will no longer accept such a situation.

Allowing part of the closed railway route (13km) near Kiltimagh to be used for a velorail but prohibiting use of the closed railway for example from Charlestown to Swinford as a greenway is prejudicial, unfair, and shows clear bias and prejudice against community led projects and groups that support the greenway option for the closed railway on other parts of the closed railway.

MTO6 is prejudiced in this regard, this is totally unacceptable

As a community group advocating a greenway EMGG will have a legitimate claim that the county plan because of what MTO6 states about blocking a greenway from being considered in a feasibility study, **is a biased and prejudiced document.** EMGG will continue to challenge it accordingly. Is that what MCC really wants to see happen? Is that what the Department of Local Government wants? Is this modus operandi good governance on the part of MCC? With local community groups crying foul?

For this reason, under this submission MCC are hereby formally put on notice by EMGG that MTO6 is considered prejudicial against the people of Mayo that want a greenway on the closed railway north of Claremorris.

MCC is put on notice by EMGG that MCC are building this prejudice into the county plan via MTO6 in an attempt to block a greenway from even being considered even as part of a feasibility study.

Continuing to block the idea of a greenway on the closed railway route mentioned herein is removing people's right to be treated fairly, equally and with due respect by the public administrators, officers and members of MCC.

MCC is failing in its public obligation to treat those who argue for a greenway on the closed railway to be treated equally with those who advocated a velorail on the closed railway.

Both projects achieve exactly the same objective of Irish Rail and the Department of Transport; to protect the route in public ownership, should the route ever be required for railway in the future.

Equality is the essence of our democracy. EMGG is not being treated equally due to prejudice from MCC.

5.0 How to resolve the prejudicial situation in the county plan in MTO6

Key points for discussion

1. EMGG does not want conflict with MCC.
2. EMGG is a community group with considerable public support. EMGG wants to be treated fairly and equally.
3. There is clear evidence which shows the majority of people in the communities of East Mayo support the greenway option now on the closed railway.
4. A compromise is possible. It is incumbent on MCC to achieve a compromise with the communities involved and not take up a position of conflict.
5. MTO6 as it stands places MCC in conflict with the communities of East Mayo.

Argument for change: The hostile and prejudicial attitude shown in MTO6 by MCC to stop the greenway at all costs, is not the way to go, and is simply going to lead to more animosity towards the council from the majority of people who support the East Mayo Greenway. Is that what MCC want, a hostile public which sees a council which does not respect their views?

What can MCC do to resolve this situation in the interests of good, fair and unbiased governance?

There are plenty of kilometres of closed railway route between Charlestown and Claremorris to accommodate both sets of opinion, at present in MTO6, MCC is making a prejudicial choice to only allow one point of view to be heard and given proper consideration in the county plan, this biased and prejudicial attitude should not be accepted by the public, the members and the management of MCC. **It is no longer acceptable**

There is little doubt that the extreme stance MCC is taking in MTO6 shows prejudice on the part of MCC in this matter and leaves the county plan open to the challenge of being prejudicial and unfair and being referred to the Department of Local Government and other parties as a hostile and prejudicial policy document. **EMGG will take this matter further if MTO6 is not amended.**

The following amendment to the county plan is recommended for MTO6:

“A feasibility study considering connecting Collooney (county Sligo) with the Great western greenway will include consideration of the use of the closed railway route from Charlestown to Swinford as a potential Greenway route. Such a route would connect with the Sligo Greenway at Charlestown and provide a potential link for a greenway from Enniskillen to connect with the Great Western Greenway. In addition, a feasibility study will be undertaken to consider using the closed railway route as a greenway from Swinford to Claremorris south of the N5 with due consideration given to a parallel greenway to run alongside the Velorail project which has been funded by the Department of Rural and Community affairs. Both the Velorail and any greenway that may be placed on the closed railway route will be contingent on strict licensing conditions from Irish Rail that if the route is needed for railway in the future a railway will be given precedence over the Velorail and any Greenway on the route north of Claremorris to Charlestown”

In relation to 4.1 above in regard to the proposal for a greenway across the high amenity area of the Ox mountains, if MCC wish to continue with this idea the amendment to that part of MTO6 should read:

“Mayo county council will also seek to co-operate with Sligo County council to undertake a feasibility study for a greenway from Collooney to the Great Western Greenway via the high amenity areas of the Ox Mountains”

The county plan needs to be amended accordingly to avoid future conflict on this matter and to deliver fairness in governance to all parties:

- Those that want a greenway on the closed railway until a railway is possible
- Those that want a velorail for 13 km on the closed railway until a railway is possible
- Those that want to protect the route in public ownership until such time as a railway is possible

MTO6 fails to represent all community views as it stands and must be changed accordingly to avoid further conflict with communities in East May

Many thanks.

East Mayo Greenway Committee on behalf of Group members

25th April 2021

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