



Samenwerkende Groeperingen Leefbaar Amersfoort

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CEF Coordination Committee/CINEA
INEA-AdvisoryGroup@ec.europa.eu

Concerning: ProRail application for 2020 CEF Transport MAP, project Amersfoort (The Netherlands)

Dear members of the CEF Coordination Committee/CINEA

We kindly request your special attention for the 2020 CEF Transport MAP application of ProRail in cooperation with the municipality of Amersfoort, dated 17 March 2021. We conclude that this application does not meet the requirements of the CEF Transport MAP as published on 15 December 2020. Therefore we request you to reject this application.

To introduce ourselves shortly : "we" are SGLA en Groen in Amersfoort, two citizen organisations aiming for a green, sustainable, pleasant Amersfoort as place to live. (More information in Dutch: <https://www.sgla.nl/> and <https://www.groeninamersfoort.nl/>)

The ProRail application

Before explaining and underpinning our request, we would like to say a few words about the ProRail application itself.

Despite the fact that government task organisation ProRail is a public body, ProRail has classified the CEF Transport MAP application. The application is declared secret. We reject this lack of transparency. We believe that EU citizens should know everything about (possible) EU subsidies.

However, from information from our city council, we know what the application entails: the 'Westelijke Ontsluiting' project, and more specifically replacing the level crossing in Amersfoort west (section Utrecht- Amersfoort) by a car tunnel plus a bridge for pedestrians and cyclists.

ProRail is leading the ongoing tendering process for this Westelijke Ontsluiting, but is not the project owner. According to answers from the state secretary Mrs. S. van Veldhoven to the Dutch parliament on the role of ProRail in this project, it is so-called 'work for third parties'.

The Westelijke Ontsluiting is a project of the municipality of Amersfoort. The account and risks of the project therefore lie with this party. According to state secretary Van Veldhoven ProRail is only involved in the underpass and the cycle

path across the tracks and not in the entire project. This makes the recent application fundamentally different from the earlier CEF application for renewal of railroad switches in Amersfoort east that was granted with around EUR 7 million from CEF in July 2020.

Our arguments

Whilst the railway section Utrecht-Amersfoort is part of the North Sea - Baltic Corridor of the TEN-T Core Network, we have a series of arguments on the basis of which we believe you should reject the application:

Removal of the railroad crossing in Amersfoort west does not serve the objective of the CEF Transport MAP

Removal of the level crossing in Amersfoort west (Barchman Wuytierslaan) does not serve the objective of the CEF Transport MAP, stated as: "removing bottlenecks, enhancing rail interoperability, bridging missing links and, in particular, improving cross-border sections".

The Utrecht-Amersfoort section, and more specifically the Barchman Wuytierslaan level crossing, is not a Pre-Identified Section/Project" set out in Regulation 1316/2013 Annex I part I, nor a bottleneck in the Trans-European Core Network.

On the contrary, the Utrecht-Amersfoort section already meets the EU requirements for the Core Network. As you can see, on the interactive EU map, the Utrecht-Amersfoort railway section - as part of the North Sea Baltic Corridor - is listed as "Core Conventional Completed"

<https://ec.europa.eu/transport/infrastructure/tentec/tentec-portal/map/maps.html> (See screenshot and page 2 of Annex I, attached to this email)

Furthermore:

- Replacement of the Barchman Wuytierslaan level crossing with a tunnel/bridge does not increase the capacity of the Utrecht-Amersfoort railway section. It does not allow more trains to run, nor does it make trains faster.
- The relevant future plans *Toekomstbeeld OV 2040* and *Programma Hoogfrequent Spoorvervoer* of the Dutch Ministry of Infrastructure and Water Management do not foresee extra passenger trains between Utrecht and Amersfoort. In *Toekomstbeeld OV 2040* the Ministry lays out criteria for the prioritization of level crossing removal. The Barchman Wuytierslaan crossing does not meet these criteria.
- The level crossing involved is not a source of disruptions to train services. Over a long period of years only a few incidents have been reported. The railway crossing is not considered unsafe. ProRail is obliged by Dutch budget regulations to prioritize level crossing removal based on a (classified) risk-based ranking. In a public hearing with the Amersfoort city council ProRail admitted that based on this ranking they have no plans for adjustments of this crossing in the foreseeable future.

In short, there are no public documents available that identify the Barchman Wuytierslaan crossing as a bottleneck for needed rail capacity.

The railroad crossing is being misused to get additional funding for a regional/local road project

Replacement of the level crossing is part of a long-running regional/local project Westelijke Ontsluiting to increase the road capacity for car traffic (2.5 km road). This is not a project of common interest of EU countries as identified in TEN-T guidelines.

The controversial project Westelijke Ontsluiting has been underway for many years and was tendered November 2019. However, in the summer of 2020, none of the contractors appeared willing to build the road for the available budget. Therefore, the tender has been put on hold to find additional budget. In that search for money, the eye fell on CEF.

Furthermore, we would like to point out that the municipality itself is not willing to spend money on this project. It is funded out of a regional mobility program to which the municipality contributed no more than 4.5%. It is not an exaggeration to say that the project only has support in the city council if external parties are willing to foot the bill.

No preparation for the implementation of a TEN-T core network project

As described above, there are no preparatory activities. The situation is a project with a tender on hold, and a municipality looking for additional money. The history of the project goes back decades. Studies, actions to define and develop the project and decide on its financing, technical design, permitting procedures and preparation of the tendering process have already been taken in the past years. Even initial preparatory work in the field has been carried out, such as cable and pipeline work.

Therefore we see a conflict with the financial provisions in the CEF-regulation as the studies and preparations for the project Westelijke Ontsluiting have all been delivered prior to the submission of the application under the call (17 March 2021). The tendering process Westelijke Ontsluiting has started 11 November 2019 by the publication on TenderNed: <https://www.tenderned.nl/tenderned-tap/aankondigingen/180143>

The project is controversial and public support is crumbling

As mentioned before the Westelijke Ontsluiting project

(<https://www.youtube.com/watch?v=LiidcrKGe1Y>) is controversial. For many reasons. By now it is becoming increasingly clear that the project is a solution to a non-existent problem (there are no traffic jams). And this solution not only requires 68.3 million EUR of public money (plus the now wanted additional EU budget of around 15 million EUR), but also costs around 4,000 trees and threatens the habitat of endangered species such as the badger and sand lizard, all this against the background of the climate crisis and the Green Deal. More than 10,000 citizens signed our petition 'save the tree, axe the road'

(<https://www.petities.com/nee-tegen-westelijke-ontsluiting>). Public support for the project is further crumbling, and more and more voices in our council are raised in favor of stopping the project all together, or replacing it with a less costly, better project that does not require felling a large amount of trees.

In addition, residents near the railroad fear that the CEF application will lead to extra freight trains passing right through the city, threatening their sleep, health and safety. The Dutch rail industry has come out in support of a dedicated freight route for eastbound freight, which relieves a large number of cities in the eastern part of the Netherlands from nightly freight trains. In a petition, 1,000+ citizens have now opposed the CEF application for Amersfoort west. They believe, as we

do, that European financial support is better spent on this dedicated alternative. (<https://petities.nl/petitions/stop-extra-goederentreinen-door-amersfoort>)

Future application CEF 2.0

ProRail and the municipality of Amersfoort have announced to also apply for CEF 2.0 running from 2021 to 2027 once the call is open. Considering the press release of the European Council dated 11 March 2021 ("priority will be given to further development of the trans-European transport networks (TEN-T), focusing on missing links and cross-border projects with an EU added value") we a priori see no reason whatsoever why Amersfoort west should be eligible for CEF 2.0 funding. In advance, we reiterate our objections.

We regret the fact that ProRail has declared its CEF-application secret. This forces us to go 'by the outside', and approach your committee directly. Using legitimate means we oppose the waste of green and community money, in our municipality, province, the Netherlands and the EU. We always act transparent, fair and come out into the open. For that reason we send a CC of this mail to the city council of Amersfoort and the government/council of the Province of Utrecht.

We hope that our information will further enable your Committee to make a good decision about the ProRail CEF-application regarding Amersfoort west. We are looking forward to hearing from you. If you require more information, please let us know. We would be very pleased if we would have the opportunity to provide further information on our request in person.

Kind regards,



Peter de Langen
chairman of the board
Samenwerkende Groeperingen Leefbaar Amersfoort (SGLA)



Christian van Barneveld
chairman of the board
Stichting Groen in Amersfoort