

Lilian Greenwood MP

Minister for Local Transport
(by email to @dft.gov.uk)

2 December 2025

Dear Ms Greenwood

Queensbury Tunnel

Thank you for your letter of 24 November 2025, the contents of which are noted.

Unfortunately, once again, we find ourselves having to respond to a number of errors and omissions which we will address later in this letter.

You put forward two key drivers for your decision the fund the abandonment of Queensbury Tunnel: safety and value for money. These are considered separately below.

Safety

Between 2018 and 2021, stabilisation work was undertaken to sections of the tunnel through which severe lining defects had developed, and additional support/strengthening was provided at the shafts. You assert, based on advice from National Highways (NH), that the work on the shaft eyes was carried out "to reduce risks in the short to medium term".

A former employee of AmcoGiffen, NH's Queensbury Tunnel contractor, who has project-managed similar schemes in Network Rail tunnels, is clear that exposed RamArch (used for the brickwork stabilisation) has an expected lifespan of around 50 years, whilst RamArch encapsulated in sprayed concrete (used to strengthen Nos. 4, 6 & 8 Shafts) has a design life of 120 years. The interventions at Nos. 2 & 3 Shafts, whilst temporary in design, will effectively provide permanent support. The *intention* might have been to reduce risks "in the short to medium term"; however, in practice, the works have reduced risks at the shafts in the long term.

It should be noted that whilst Jacobs' *Queensbury Tunnel Options Report* (2016) identifies the possibility of a shaft collapse and consequential opening of a surface sinkhole, it asserts that "If, however, the surrounding rock/soil is competent, then the development of a sinkhole is unlikely and the shaft will be able to support itself without the lining in place."



It goes on, "It is Jacobs opinion that the strata surrounding the shafts is mostly self-supporting and that the shaft linings are connected into the surrounding strata. Collapse of the shaft linings is therefore seen as a lower risk than collapse of sections of the tunnel." The report further recognises that "in the event of a [shaft] lining failure surface subsidence could be minimal to non-existent".

NH's continued citing of the fatal 1953 collapse at Clifton Hall Tunnel as an indicator of the risk associated with shafts generally is nothing short of a deliberate attempt to mislead decision-makers, in full knowledge that the circumstances were entirely different to those at Queensbury and have no relevance.

In this regard, we remind you of our request - which you failed to acknowledge - to play you a recording of an AmcoGiffen whistle-blower whose testimony helps to explain why NH misrepresents the risks associated with Queensbury Tunnel's shafts. It is clearly a matter of public interest that the concerns raised are subject to appropriate scrutiny.

At the stakeholder meeting you hosted on 22 July 2025, the engineer from NH accepted that the risks currently presented by the shafts are low.

Inspections of Queensbury Tunnel completed since 2021 identify a small number of newly-recorded minor defects, some of which are demonstrably *not* new. In any case, they are typical of those found in dozens of other disused railway tunnels which are safely inspected through the implementation of appropriate safeguards.

You assert, based on advice from NH, that "Chartered Civil Engineers within NH's Historical Railways Estate team" have subsequently reviewed the inspection reports. We note that one of those engineers has previously told us that "We're weak when it comes to tunnels". You also assert, based on advice from NH, that "A detailed risk assessment will take place before any [future] works begin, ensuring the safety of contractors on site."

However, you fail to explain on what basis the HRE engineers have validated the examiner's unusual and unlikely conclusion that a collapse could occur at Tab 46 due to the possible development of a void behind the lining through which "a heavy dripping water noise" was perceived. Where is the evidence - in the form of an investigation report - that informed that review? If this issue can be overcome through "detailed risk assessment", why hasn't that already been done, allowing the resumption of inspections?

You boldly assert that the abandonment of Queensbury Tunnel is necessary on the grounds of safety. However, the evidence clearly demonstrates that both public and workforce safety risks are low, unlikely to meaningfully increase and can be controlled through risk assessment and associated routine interventions.



Value for money

With the exception of No.1 Shaft, the 2018-21 tunnel works delivered additional long-term support/strengthening to Nos. 2, 3, 4, 6 & 8 Shafts, addressing the major perceived public safety risks. Lining stabilisation works were undertaken to facilitate safe access as far south as No.3 Shaft. Abandonment would ensure that absolutely no value for money is derived from that £7.3M taxpayer investment.

You go on to assert that "it would not [be] fiscally responsible to continue to maintain the tunnel as a potential greenway." However, we note that you provide no estimate as to what maintenance might cost in the context of a structure with no public access and little/no workforce access. Where is the supporting evidence? For comparison purposes, what costs have been accrued over the past 30 years maintaining the 1.2-mile long Drewton Tunnel, which is also deemed 'too dangerous to enter'?

Any future maintenance liabilities would be focussed on emerging defects. Experience with masonry structures suggests that these are likely to be few in number and minor in nature, although further partial collapses are possible at areas of recorded distress.

We believe there should be no requirement to fund any maintenance work in the short term and the tunnel could be left to slowly deteriorate in the medium term without any public safety implications. If, however, it was deemed prudent to carry out periodic repair programmes - perhaps on a ten-yearly basis - a reasonable cost estimate might be £200K. Disregarding inflation, it would therefore take 375 years before the taxpayer made any financial gain from the £7.5M you have committed to abandonment.

You assert, based on advice from NH, that "there are no *current* plans for re-use". This is true of most of the 3,100 legacy railway structures owned by the Department for Transport, partly as a result of the DfT's own obstructive policies. At July's stakeholder meeting, you identified a handful of HRE structures which are the subject of ongoing discussions about possible reuse. You seemed to regard this as a demonstration of success, despite representing just 0.2% of the Estate. How many structures have been publicly repurposed since DfT assumed ownership in 2013? In reality, it is not a record to be proud of and has failed to ensure that value is derived from the taxpayers' investment in maintenance.

The previous Conservative government intervened to halt the unjustified and destructive infilling and demolition programme previously pursued by NH which would have resulted in more than a hundred legacy bridges and tunnels being lost, scuppering plans for multiple active travel and heritage railway schemes. Would you support a return to that type of reckless, short-sighted asset management whereby structures with identified potential for future repurposing are put beyond use?



At this time, there are viable proposals for an ambitious and beneficial greenway network connecting Bradford, Keighley and Halifax, sections of which are currently being progressed. Contrary to your previous assertions, based on advice from civil servants, there is no realistic alternative to the use of Queensbury Tunnel for the cross-district link between west Bradford and Calderdale as the so-called 'Alpine route' involves severe constraints in terms of safety, gradients, on-road sections, user desirability and deliverability.

Bradford Council (BC) and West Yorkshire Combined Authority (WYCA) might *currently* have no funding to repurpose the tunnel, but BC has stated recently that it remains "supportive of restoring the tunnel in principle" and one of its attendees at the stakeholder meeting made clear that they wished the tunnel to remain available for future use.

It is entirely within your Government's gift to award BC/WYCA £9M to complete the proportionate repair of Queensbury Tunnel and a further £2M to reopen it by installing lighting and a path. This would connect Holmfield to existing sections of the Great Northern Railway Trail and allow the "Most Attractive and Advantageous" option for a greenway network - as developed by Sustrans - to be delivered in stages over time.

We note that your Government continues to fund HS2 (BCR 1.1-1.8), the Lower Thames Crossing (BCR 1.46) and the dualling of the A66 (BCR 0.9) which offer substantially lower value for money than the Queensbury Tunnel Greenway (BCR 3.0), even allowing for NH's gold-plated repair costing (BCR ~4.0 otherwise).

Any reasonable person must recognise that it is fiscally *irresponsible* to spend £7.5M putting a structure beyond use unnecessarily just four years after spending £7.3M to make it safe for future use, given that it currently presents low levels of risk and minimal maintenance liabilities. The alternative option - its incorporation within an active travel network - would deliver social, economic, tourism and heritage benefits, as well as considerable value for taxpayers' money.

It should also be recognised, on the basis of past experience, that there is a high likelihood that abandonment will cost far in excess of the estimated £7.5M.

Other matters

You assert, based on advice from NH, that "maintenance of the tunnel from the south portal, including Shaft 1, remains the responsibility of the landowner."

¹ See BBC News article from 16 July 2025: https://www.bbc.co.uk/news/articles/cly2xr8kg2po



Appended to this letter is the Conveyance dated 8 March 1965, made between BRB and for the strip of land over the tunnel extending from the south portal to No.2 Shaft. It states in Clause 1 that the sale "EXCEPT[S] AND RESERV[ES] unto the Board the sub-soil or under-surface of the property below a depth of thirty feet from ground level *and the tunnel* retaining walls girders stanchions foundations sewers drains and works of the Board situate under the property *and air shafts* connected with the said tunnel...".

If the sale included an obligation on the purchaser to repair a tunnel they did not own or have access rights to, this would need to be imposed expressly, but was not. On the basis of this evidence, we reject your analysis of the maintenance responsibilities at the south end.

You assert, based on advice from NH, that "Shaft 2 was not infilled under emergency development rights".

Appended to this letter is NH's response to an FoI request, dated 19 November 2019, which explicitly states that, for the infilling of No.2 Shaft, "the Secretary of State for Transport was reliant upon powers provided to him as the owner pursuant to Class Q of (Part 19) of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015."

These permitted development rights apply only in emergency situations and, at the time, required the developer to restore the site to its pre-existing state within six months unless permission for retention was granted in writing by the relevant Local Planning Authority, in this case BC. However, BC issued a Planning Contravention Notice (appended) asking for the works to be halted, which NH ignored. No such consent was granted. The infilling of No.2 Shaft is therefore unauthorised development. We presume you believe that public bodies should uphold the law and will therefore instruct NH to remove this infill.

You assert, based on advice from NH, that "ongoing issues with air quality" have been noted. The 2025 inspection report records the atmospheric pressure inside the tunnel to be identical to that outside it, specifically 992 mbar. However, no inspection report since 2021 includes any reference to air quality or 'toxic gases', so where is the supporting evidence?

In 2021, National Highways infilled a bridge at Great Musgrave in Cumbria, claiming it was necessary "to prevent the failure of the bridge and avert a collapse". There was no consultation with the local community and the longstanding aspirations of two heritage railways to relay the track under the bridge were thus thwarted. The scheme was forced through under misapplied emergency permitted development rights after the Local Planning Authority asked NH not to start the works, as per the appended email chain.



But there was no emergency: the structure was in Fair condition, presented no threat to public safety and is now assessed as having a capacity of around 137 tonnes. In that case, the planning regime caught up with NH and it was forced to remove the infill. It is a matter of regret that you have chosen to repeat many of the mistakes by consigning Queensbury Tunnel to abandonment without safety justification, ignoring the arguments for retention.

NH routinely plays 'the safety card' - exaggerating risk and misrepresenting engineering evidence - in order to get its own way. That said, we understand why you would believe the skewed, partial submissions of civil servants who want to rid themselves of Queensbury Tunnel once and for all. To that end, they have repeated a trick from 2016 when their first disproportionate repair scheme - costed at £50M² (inflation-adjusted) - pushed the direction of travel firmly towards abandonment until AECOM's detailed £6.9M proposal - based on extensive surveys - brought stakeholders back to the table.

We urge you to reject this ploy and instead reflect on the positive vision for the structure advocated by the local community who have worked tirelessly for 12 years, presenting detailed evidence in support of their ambition and now vindicated by the Sustrans study which describes the potential for an "iconic and nationally significant" addition to our cycle network, delivering substantial benefits and a high BCR.

Your decision to fund abandonment fails against your stated imperatives of safety and value for money. Changing your mind is not a sign of weakness if the evidence upon which a decision was originally made turns out to be flawed; it demonstrates courage and an understanding of what is right. The taxpayer's £7.5M could largely transform Queensbury Tunnel into a greenway-ready asset and, if you are determined to spend more money on the structure, is the only option that offers the potential for public benefit.

Yours sincerely



Graeme Bickerdike

Engineering Coordinator, Queensbury Tunnel Society

СС

Tracy Brabin: Mayor of West Yorkshire Robin Tuddenham: Chief Executive, Calderdale Council Judith Cummins MP, Naz Shah MP, Kate Dearden MP Cllr Alex Mitchell, Cllr Hazel Johnson Lorraine O'Donnell: Chief Executive, Bradford Council Simon Lightwood MP: Minister for Roads and Buses Relevant Bradford Council officers Cllr Alex Ross-Shaw, Cllr Matt Edwards

² London & Continental Railways described this costing as "simply too high to be credible" in an independent review carried out for the DfT.



This is to certify that this is a true copy of the original document

Dated this 16 day of 05 2012

Signed_COBBETTS LLP Cobbetts LLP







E is made the day of

One thousand nine hundred and sixty five B E T W E E N BRITISH RAILWAYS BOARD (hereinafter called "the Board") of the one part and

at Ambler Thorn



in the County of York (hereinafter called "the Purchaser") of the other part

WHEREAS the Board are seised in unincumbered fee simple in possession of (inter alia) the property hereinafter described and have agreed with the Purchaser for the sale to it of the said property for the like estate in possession free from incumbrances at the price of TWENTY FIVE POUNDS

NOW THIS DEED WITNESSETH as follows:-

- IN pursuance of the said agreement and in consideration of the sum of TWENTY FIVE POUNDS paid to the Board by the Purchaser (the receipt whereof the Board hereby acknowledge) the Board as Beneficial Owners hereby convey unto the Purchaser A L L T H A T piece or parcel of land containing an area of One decimal three nine acres or thereabouts situate at Ambler Thorn aforesaid as the same is more particularly delineated on the plan hereunto annexed and thereon coloured blue All such premises being hereinafter called "the property" EXCEPTING AND RESERVING unto the Board the sub-soil or under-surface of the property below a depth of thirty feet from ground level and the tunnel retaining walls girders stanchions foundations sewers drains and works of the Board situate under the property and sir shafts connected with the said tunnel delineated on the said plan and thereon marked "air shafts" T 0 H O L D the same U N T O the Purchaser in fee simple SUBJECT to and with the benefit of an Agreement dated the twenty first day of April One thousand nine hundred and fifty nine and made between The British Transport Commission of the one part and The Yorkshire Electricity Board of the other part and SUBJECT ALSO to three accommodation roadways and a public footpath running over the property
- 2. THERE are excluded from the conveyance hereby made (i) any mines or minerals under the property except in so far as the same were expressly conveyed to the Great Northern Railway Company on the acquisition of the property for the purposes of a railway and are not now vested in the National Coal Board and (ii) any easement or right of light air or support or other easement of right which would restrict or interfere with the free use by the Board or any person deriving title under them for





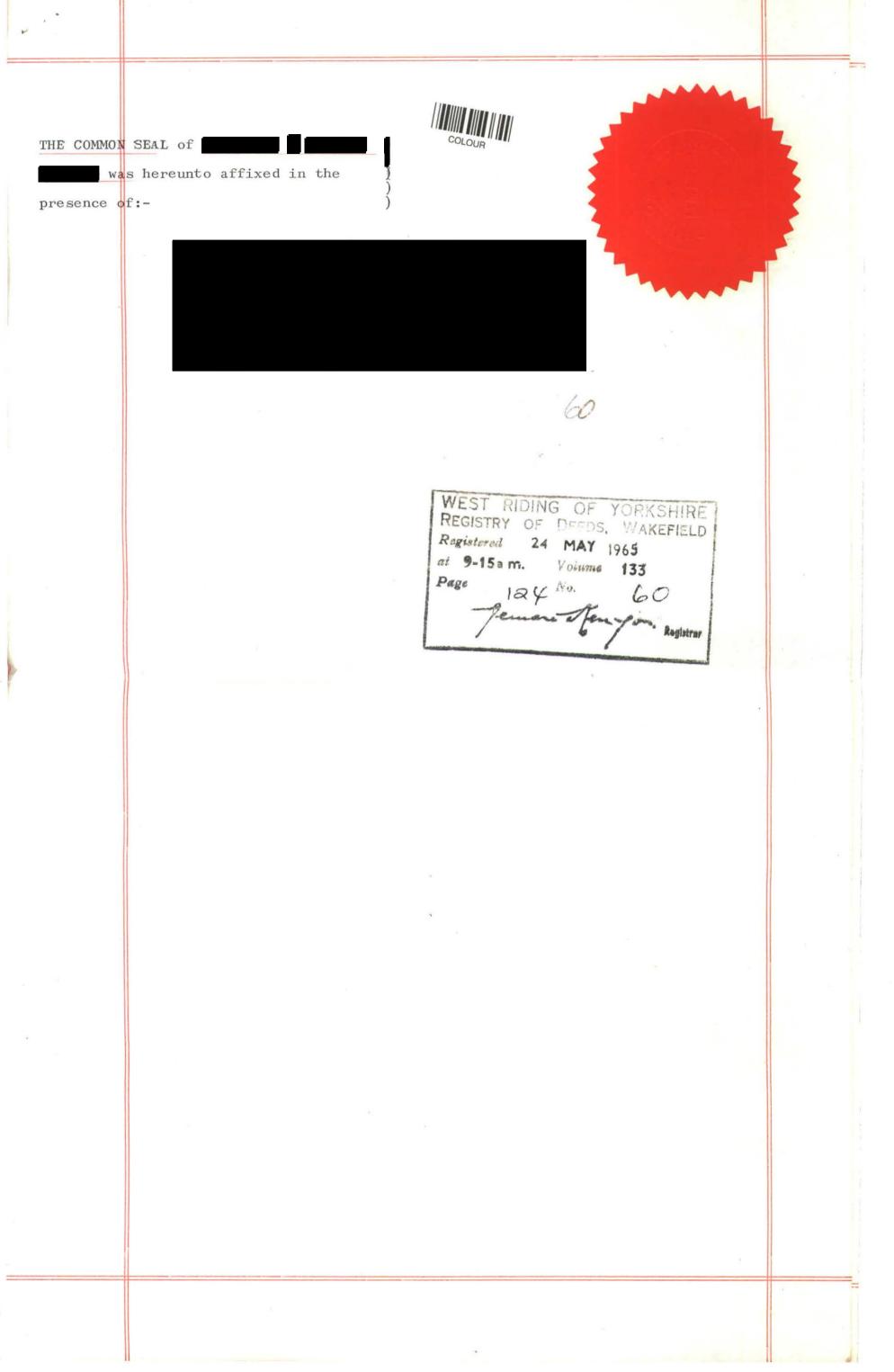
building or any other purpose of any adjoining or neighbouring land of the Board (whether intended to be retained or to be sold by them 3. THE Board hereby reserve to themselves the right at any time to erect or suffer to be erected any buildings or other erections and to alter any building or other erection now standing or hereafter to be erected on any part of their adjoining or neighbouring land in such a manner as to obstruct or interfere with the passage of light or air to any such building which is or may be erected upon the property and any access of light and air over the adjoining land of the Board shall be deemed to be enjoyed by the licence or consent of the Board and not as of right

- 4. THE Purchaser hereby grants to the Board a right of way in perpetuit free of all charge to the Board to pass and repass at any time with or without workmen plant and machinery over the Purchaser's private roadway between the points "A" and "B" on the said plan and over the Purchaser's adjoining land between the said roadway and the Board's railway
- 5. THE Purchaser hereby releases the Board from all obligations (if any to maintain the said tunnel and air shafts and any works connected therewith and any fences walls water courses road crossings footpaths or other works made for the accommodation of the lands adjoining the property and will indemnify the Board from and against any claims whatso ever arising out of such obligations as aforesaid and also out of any subsidence occurring on any part of the property
- 6. THE Board hereby acknowledge the right of the Purchaser to production and delivery of copies of an Indenture of Conveyance dated the twenty seventh day of October One thousand eight hundred and seventy five and made between Michael Stocks of the one part and the Great Northern Rails Company of the other part and hereby undertake for the safe custody thereof
- 7. IT IS HEREBY CERTIFIED that the transaction hereby effected does no form part of a larger transaction or of a series of transactions in respect of which the amount or value or the aggregate amount or value of the consideration exceeds Four thousand five hundred pounds
- IN WITNESS whereof the Board and the Purchaser have caused their respective Common Seals to be hereunto affixed the day and year first hereinbefore written

Member

THE COMMON SEAL of BRITISH RAILWAYS BOARD) was hereunto affixed in the presence of:-)

. .





Our ref:Fol 100438 Your ref:

Sent via Email

Historical Railways Estate 3rd Floor 37 Tanner Row YORK YO1 6WP

Direct Line: 19th November 2019

Dear

Freedom of Information Request – Queensbury Tunnel – Emergency Powers

I am writing to confirm that we have now completed our search for the information, which you requested on 23rd October 2019.

A copy of the information is below.

In agreeing to the infilling of shaft two at Queensbury Tunnel, the Secretary of State for Transport was reliant upon powers provided to him as the owner pursuant to Class Q of (Part 19) of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015.

If you are unhappy with the way we have handled your request you may ask for an internal review within 2 months of the date of this response for Freedom of Information requests and within 40 days for Environmental Information Regulations requests.

Our internal review process is available at: https://www.gov.uk/government/organisations/highways-england/about/complaints-procedure

If you require a print copy, please phone the Information Line on 0300 123 5000; or e-mail info@highwaysengland.co.uk. You should contact me if you wish to complain.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF





If you have any queries about this letter, please contact me. Please remember to quote reference number FoI 100438 in any future communications.

Yours sincerely



Historical Railways Estate

Email: @highwaysengland.co.uk

IMPORTANT - THIS COMMUNICATION AFFECTS YOUR PROPERTY PLANNING CONTRAVENTION NOTICE

CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990 (as amended by the PLANNING AND COMPENSATION ACT 1991)

- To: Head of Estate, Group Property, Corporate Finance, Department for Transport, Great Minster House, 33 Horseferry Road, London, SW1P 4DR.
- 1. It appears to City of Bradford Metropolitan District Council ("the Council"), being the local planning authority for the purposes of Section 171C of the Town and Country Planning Act 1990 ("the Act"), that there may have been a breach of planning control in respect of the land described in Schedule 1 below ("the land").
- 2. The breach of planning control which may have occurred is specified in Schedule 2 below.
- This notice is served on you as a person who -
 - (1) is the owner or occupier of the land or has any interest in it; or
 - (2) is carrying out operations in, on, over or under the land or is using it for any purpose.
- 4. In exercise of their powers under Section 171C(2) and (3) of the Act the Council require you, so far as you are able, to give them the following information in writing within twenty-one days, beginning with the day on which this notice is served on you:
 - A. Full details of the operations currently being undertaken on the land.
 - B. Copies of all engineering and environmental consultants' reports concerning the operations being undertaken.
 - C. Copies of all assessments of flood risk relating to the operations being undertaken.
 - D. Copies of all legal advice received in relation to the works being undertaken including the counsel's advice referred to in the attached letters from the Department for Transport dated 21 October 2019 and from Hollingworth Bissell dated 25 October 2019.
 - E. Your undertaking that no further operations will be carried out until the Council has considered the above information.
- 5. If you wish to make -

- (a) an offer to apply for planning permission, or to refrain from carrying out any operations or activities, or to undertake remedial works; or
- (b) any representations about this notice,

Please	contact my instructing	officer	on telephone number	
	to arrange a mutually	convenient appoint	tment to discuss any su	ich offer
ог герге	esentation.			

Dated 25th October 2019



City Solicitor
Legal and Democratic Services
City of Bradford Metropolitan District Council
City Hall
Bradford
BD1 1HY

SCHEDULE 1

Land to which this notice relates

Shaft Number 2, Queensbury Tunnel, Queensbury, Bradford, West Yorkshire.

SCHEDULE 2

The breach of Planning Control which may have occurred

Unauthorised infilling works at Shaft Number 2, Queensbury Tunnel.

WARNING

- 1. It is an offence to fail, without reasonable excuse, to comply with any requirement of this notice within twenty-one days beginning with the day on which it was served on you. The maximum penalty on conviction of this offence is a fine of £1,000. Continuing failure to comply following a conviction will constitute a further offence.
- 2. It is also an offence knowingly or recklessly to give information, in response to this notice, which is false or misleading in a material particular. The maximum penalty on conviction of this offence is an unlimited fine.

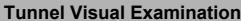
ADDITIONAL INFORMATION

- 3. If you fail to respond to this notice, the Council may take further action in respect of the suspected breach of planning control. In particular, they may issue an enforcement notice, under Section 172 of the 1990 Act, requiring the breach, or any injury to amenity caused by it, to be remedied.
- 4. If the Council serve a stop notice, under Section 183 of the 1990 Act, Section 186(5)(b) of the Act provides that should you otherwise become entitled (under Section 186) to compensation for loss or damage attributable to that notice, no such compensation will be payable in respect of any loss or damage which could have been avoided had you given the Council the information required by this notice, or had you otherwise co-operated with the Council when responding to it.



BRIDGE & STRUCTURE EXAMINATION REPORT

Highways England





ELR: HQU

Contract Mileage: 197m 00.00chs

Struc. Ref: 3D



Photo No 43 - HQU - 197mls - 0000yds - 00.00ch - Structure No - 3D - $\,$ - 19/03/2025 General Photo - Atmospheric pressure outside tunnel



Photo No 44 - HQU - 197mls - 0000yds - 00.00ch - Structure No - 3D - $\,$ - 19/03/2025 General Photo - Atmospheric pressure inside tunnel

To: @eden.gov.uk

@nationalhighways.co.uk Cc:

Sent: 28/05/2021

Re: HRE – EDE/25 Great Musgrave railway Bridge

Hi **T**,

The bridge failed a structural assessment in 1998 and the local highway authority refuses to apply a weight restriction. The works that we have planned remove the risk of failure of this bridge and are reversible. We consider the works to be permitted development as they will prevent a future collapse and preserve public safety (under class Q). On this basis I am not going to ask the contractor to stop works.

Regards,



Historical Railways Estate (on behalf of Department for Transport)

Highways England | 37 Tanner Row | York | Y01 6WP

General Office: +44 (0) 1904 621924

Mobile: I

Web: http://www.highwaysengland.co.uk

If you would like to make a request under the Freedom of information Act, please contact info@highwaysengland.co.uk

Mondays – I am not in the office and do not have access to emails

From: @eden.gov.uk]

Sent: 28 May 2021 15:43

@highwaysengland.co.uk>

Subject: RE: Historic Railways Estate (HRE) Team - EDE/25 Great Musgrave railway bridge

Hi 💮

Thanks for the additional information.

I have discussed your response with a colleague and whilst you have provided some details as to the works being undertaken could you please advise why these works are being undertaken and what assessment has been undertaken in terms of the need for the works?

It would be helpful if as much information was provided as possible as we are looking to make an assessment as to whether these works constitute Permitted Development or whether planning permission should be sought. As such we would ask that you do not commence with the works until such time as we have made this assessment.

Any additional information as to your own views as to why you consider that these works constitute Permitted Development would be useful to receive.

Kind Regards

Planning Technician
Planting Services Team

Eden District Council Mansion House Friargate Penrith Cumbria CA11 7YG

Tel -

www.eden.gov.uk www.twitter.com/EdenCouncil www.facebook.com/EdenDistrictCouncil

From: @highwaysengland.co.uk

Sent: 28 May 2021 14:51

To: @eden.gov.uk>

Subject: RE: Historic Railways Estate (HRE) Team - EDE/25 Great Musgrave railway bridge

We are filling the area under the bridge with imported stone. The works should take 4 weeks to complete.

Regards,

Historical Railways Estate (on behalf of Department for Transport)

Highways England | 37 Tanner Row | York | Y01 6WP

General Office: +44 (0) 1904 621924

Mobile:

Web: http://www.highwaysengland.co.uk

If you would like to make a request under the Freedom of information Act, please contact

info@highwaysengland.co.uk

Mondays – I am not in the office and do not have access to emails

From: @eden.gov.uk]

Sent: 28 May 2021 14:37

@highwaysengland.co.uk>

Subject: RE: Historic Railways Estate (HRE) Team - EDE/25 Great Musgrave railway bridge