



Daniel Greenberg CB
Office of the Parliamentary Commissioner for Standards
House of Commons
London SW1A 0AA

(by email to [REDACTED])

27 April 2026

Dear Mr Greenberg

Concerns regarding MPs' conduct

We note from the 'Meet the Commissioner' page on your website that you "greatly welcome communications from members of the public on general or specific matters" and "believe strongly in the importance of outreach and public engagement as a method of building trust and confidence between the Members and staff of the House of Commons and the public whom we serve". It is in this context that we are writing to you.

It is a matter of disappointment that the Commissioner cannot investigate complaints against Ministers and members of the public cannot lodge a complaint through the Ministerial Code. We are also concerned that although both Codes are 'inspired and informed' by the Seven Principles of Public Life, not all the principles are specifically reflected in the rules to which Members are obliged to adhere.

For example, none of the 17 rules in the House of Commons Code of Conduct seeks to enforce the imperatives of objectivity and honesty. Given the public's longstanding unease around politicians and truth-telling, this seems to be an inexplicable gap in the regulatory regime. Objectivity and honesty are the foundations upon which trust is built.

For the avoidance of doubt, we would be submitting a formal complaint against Rt Hon Heidi Alexander MP, Lilian Greenwood MP and Simon Lightwood MP if it was possible for us to do so. Even recognising the perceived issues identified above, we take the view that there would be a case to be made under Rule 2, requiring Members to "base their conduct on a consideration of the public interest".

For your reference, we've set out detailed grounds in the appended pages, but we will briefly summarise them for the purposes of convenience, in seeking your view.

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For the past 13 years, we have been campaigning to repurpose a 1.4-mile long disused railway tunnel that passes under our village. This outstanding Victorian feat is embedded in our community's social history and could play an inspiring role in its future.

A recent feasibility study found that the tunnel could form the centrepiece of "an iconic and nationally significant" network of active travel routes linking two large population centres that are otherwise separated by a substantial topographical barrier. Considerable value-for-money would be delivered through social, economic and tourism benefits, quantified as £3 for every £1 invested.

However, Ministers have instead allocated £7.5M to progress an abandonment scheme which would involve infilling around 6% of the tunnel and its associated ventilation shafts, leaving the remaining 94% to collapse below the village. It should be noted that, between 2018 and 2021, National Highways - as the structure's custodian - spent £7.3M of public money on strengthening and stabilisation works to secure the tunnel for future reuse.

We believe the Government's decision is a function of logistical and access constraints caused by flooding of the tunnel which arose as a consequence of National Highways' failure to pay three years' rent - totalling £150 - on a pumping station it installed in 2016. But the public case for abandonment - promoted by the cited Ministers - is based on a distortion involving safety (the perceived 'trump card'), ongoing maintenance costs and the availability of alternative routes.

Given our deep understanding of the issues, it is clear to us that multiple letters written by Ministers both to our Society and 219 MPs - and hence to more than 500 of their constituents - perpetuate a catalogue of untruths and misrepresentations. We are not alleging that this is deliberate; rather that the Ministers have been 'played' by civil servants who have skewed the evidence to secure their favoured outcome. However, this has no bearing on the impact: hundreds of people have been misled and that is unacceptable.

You can infer that attempts to have our concerns considered meaningfully through 'normal' channels have proved futile. So we are seeking your guidance: how should we challenge Ministers who are not acting in the public interest, not being honest and not making decisions "impartially, fairly and on merit, using the best evidence and without discrimination or bias"?

We look forward to hearing from you in due course.

Yours sincerely

A solid black rectangular box redacting the signature of Dr Norah McWilliam.

Dr Norah McWilliam

Leader, Queensbury Tunnel Society



Background

Queensbury Tunnel in West Yorkshire is a disused railway structure dating from the Victorian era that forms part of the Department for Transport's (DfT) Historical Railways Estate (HRE). It is owned by the Secretary of State for Transport and managed on the DfT's behalf by National Highways (NH).

The tunnel is an existing infrastructure asset of considerable scale (1.4 miles in length) and strategic value, connecting the large population centres of Bradford District and Calderdale which are otherwise separated by a substantial topographical barrier.

The railway through the tunnel closed in the 1950s and the withdrawal of its substantive maintenance regime has resulted in a general decline of the structure. Around 15% of it is recorded as being in Poor/Bad condition, with the remainder still Fair.

Floodwater currently extends towards the tunnel's midpoint due to NH's failure to pay three years' rent - totalling £150 - on a pumping station commissioned in 2016 and the landowner's consequential forfeiting of the associated lease. This constraint renders half the tunnel inaccessible and thus impossible to inspect or maintain, but could be resolved through dialogue with the landowner.

NH and the DfT have a longstanding aspiration to abandon (partially infill) the tunnel and its associated ventilation/construction shafts to reduce future liabilities. The testimony of a whistle-blower - formerly a manager within the company contracted to deliver the works - suggests that the perception of risk associated with the shafts was deliberately exaggerated by the contractor with the intention of securing commercial gain and empowered by the weakness of NH and its consultants in their understanding of legacy railway tunnels.

Since 2013, members of the local community have, through the Queensbury Tunnel Society (QTS), promoted their vision of the structure being repurposed as the centrepiece of an ambitious active travel network linking Bradford, Keighley and Halifax. The proposal is supported by multiple stakeholders, although it is recognised that delivery would be costly (although likely cheaper than abandonment) and challenging.

If implemented as currently drafted, Bradford Council's next Local Plan will protect the tunnel for active travel use under policy TR1.A.5. The tunnel is not listed, but is recorded by the Panel for Historical Engineering Works within the Institution for Civil Engineers - the relevant professional body - as having "regional significance". More than 16K people have signed a petition entitled "Securing a beneficial future for Queensbury Tunnel".

Four tunnel remediation plans have been developed since 2016, with varying levels of affordability. The most proportionate and sympathetic of these has an inflation-adjusted cost of around £8.7M, with a further £1.9M needed for the active travel infrastructure. There is no contention that the structure is beyond repair.

A planning application for abandonment was submitted in 2019, but Grants Shapps MP - then the Secretary of State - intervened in 2020, allocating funding for a feasibility study to determine the viability of constructing the active travel network. Published in 2024, the study concluded that high value-for-money would be accrued, with £3 returned in social, economic and tourism benefits for every £1 invested.

Largely for comparison purposes, the study also developed an alternative surface alignment for the active travel route, bypassing the tunnel. However, this option involved several interfaces with busy roads and 640 feet of climbing, and is thus considered to be highly compromised; it would be neither safe nor attractive for most users.

Reflecting the position of Mr Shapps, in 2020/21, NH undertook works to provide additional support for the shafts and stabilise failing brickwork, thus establishing safe access through sections of the tunnel in the poorest condition. This intervention cost the taxpayer £7.3M and secured the structure's availability for future use, improving its risk profile.

Notwithstanding the above, in July 2025, Ms Greenwood, then Minister for the Future of Roads, announced that she was allocating a further £7.5M of taxpayer funding to progress the tunnel's abandonment, subject to planning permission being obtained. The scheme detailed in the 2019 planning application - to which more than 8,100 people have objected - would cost an estimated £12.6M.

The decision was communicated to QTS in a letter sent by Ms Greenwood on 9 July 2025.

Our concerns

Ministers Greenwood and Lightwood have written five letters to QTS, including the one referred to above. They are repetitive and generally characterised by bold statements which often do not reasonably summarise relevant evidence on the particular issue. As an invested stakeholder with deep knowledge of the prevailing issues, QTS has provided a detailed and evidenced response on each occasion which has addressed individual points, in an attempt to properly inform and correct inaccuracies.

Of particular concern has been a reliance on figures which inflate the likely cost of repairing the tunnel and developing a route through it, and hide the likely cost of safely abandoning the structure. Assertions have been made about ongoing maintenance costs without any supporting figures being provided.

Ministers have also claimed that the surface route developed for the feasibility study would deliver “the same or similar active travel benefits” as a route through the tunnel. However, any reasonable analysis of the study demonstrates this to be unsustainable.

Neither Ms Greenwood nor Mr Lightwood has been willing to engage on matters of detail, including a letter from our solicitor relating to NH’s interpretation of a historic property conveyance. Whilst their positions have shifted subtly over time - presumably recognising that aspects of their case have no basis - there has been no change in the ultimate direction of travel. We are left to conclude that no amount of compelling evidence will satisfy them and prompt a review of their position.

We believe that abandonment is now being pursued primarily because the tunnel has become impossible to maintain effectively due to the loss of the pumping station, but civil servants have instead promoted the deception of abandonment being essential by playing the ‘trump card’ of public safety. However, as no such case can reasonably be made, supporting evidence has had to be embellished and contrary evidence played down.

As part of our campaign, supporters have been asked to contact their MPs if they oppose the decision to abandon Queensbury Tunnel. This engagement has occurred in two phases, with 58 MPs contacted in August 2025 and 219 MPs in February/March 2026. These numbers include some overlap. Ministers have responded by sending generic letters to the relevant MPs which have then been forwarded to more than 500 constituents.

We have only sourced a small number of these letters; however, it is reasonable to presume that their content is representative of the others. They are generally bolder in tone and feature multiple misrepresentations and some untruths.

The following table provides a summary.

Date/Sender/Recipient	Contested statement	QTS position
9/7/26 Greenwood to QTS	“there are less costly greenway options which do not use the tunnel that can be delivered”	<p>Untrue.</p> <p>Only one option was developed that does not use the tunnel - a surface route through Queensbury village. This has an estimated delivery cost of £3.8M. The greenway infrastructure for the tunnel route (path, lighting etc) is costed at £1.9M.</p> <p>The surface route would only be pursued in the event of the tunnel being unavailable through abandonment, which has estimated cost of £7.5M-£12.6M, thus a total of £11.3M-£16.4M.</p> <p>The tunnel route would require structural repairs. The most proportionate/sympathetic repair scheme is estimated at £8.7M, thus a total of £10.6M.</p> <p>We therefore contend that the tunnel option is cheaper.</p>

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9/7/26 Greenwood to QTS	“these options would provide the same or similar <u>active travel benefits</u> to the local community”	<p>Untrue.</p> <p>In its feasibility study, Sustrans describes the surface option as “a highly compromised solution” presenting “numerous design challenges”, “constrained highway conditions”, “steep or extended gradients” and would be “extremely challenging to deliver”.</p> <p>Specifically, several interfaces with busy roads and 640 feet of climbing would result in this option being unsafe and undesirable for most users. It would also be almost double the length of the tunnel route (3.7 miles against 1.9 miles).</p> <p>The relative benefits of the tunnel and surface route options are <i>not</i> similar.</p>
10/10/25 Greenwood to Lightwood (as constituency MP)	“Following National Highways’ assessment of the tunnel using qualified inspectors, it was concluded that it is no longer safe to enter the tunnel given the flooding, and current condition.”	<p>Untrue.</p> <p>Members of NH’s supply chain (Jacobs & AmcoGiffen) entered the tunnel for four days in early March, surveying the full extent of the tunnel’s accessible section. According to the H&S supervisor on site, this meant “working 90 tabs in”, one tab being 50 feet, hence 0.85 miles in from the north portal.</p> <p>Safe access is possible with appropriate safeguards.</p>
10/10/25 Greenwood to Simon Lightwood (as constituency MP)	“it is too dangerous for inspectors to enter the tunnel because of the single point of entry/exit, build-up of noxious gases and risk of falling debris”	<p>Untrue.</p> <p>Multiple disused railway tunnels only have a single point of entry/exit and are still inspected. However, emergency egress from Queensbury Tunnel is available via No.4 Shaft. Note that the emergency means of escape from Rhondda Tunnel, which is entered monthly, is also via a ventilation shaft.</p> <p>In response to an FoI request, NH said it had no evidence regarding ‘noxious gases’ since the major works were completed in 2021.</p> <p>The likelihood of debris falling whilst anyone is in the tunnel is low. The likelihood of debris falling whilst anyone is directly beneath the affected brick/stonework is inconceivable.</p>
10/10/25 Greenwood to Simon Lightwood (as constituency MP)	“National Highways has estimated that costs to make the tunnel safe for a greenway would be in the region of £30m”	<p>Misrepresentation.</p> <p>In 2016, NH estimated the cost of repairing the tunnel to be £35.4M. An independent review for the DfT by London & Continental Railways described this figure to be “simply too high to be credible” and suggested that it had been contrived to make the case for abandonment.</p> <p>In 2020, NH was asked again to develop a tunnel repair costing. The feasibility study identifies this figure at £22,259,087. The figure of £30M is assumed to reflect optimism bias.</p> <p>Both schemes adopted a disproportionate approach to repair involving the use of sprayed concrete throughout much of the tunnel’s length. This would substantially destroy its heritage value.</p> <p>In 2018, AECOM, commissioned by Bradford Council,</p>

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		<p>costed repair of the tunnel at £6.9M based on two weeks of on-site investigations during which every defect was recorded. Adjusted for inflation and other factors, this is now ~£8.7M.</p> <p>This figure is never mentioned by the Ministers.</p>
<p>10/10/25 Greenwood to Lightwood (as constituency MP)</p>	<p>“with further costs required to develop the rest of the route bringing the total to circa £66m (plus ongoing maintenance costs.)”</p>	<p>Misrepresentation.</p> <p>The further cost of £36M relates to the construction of a 28-mile network of paths (plus optimism bias), including two through north Halifax, two through west Bradford and one to Keighley, none of which involve Queensbury Tunnel.</p> <p>The Sustrans study specifically costs ‘the rest of the <i>tunnel</i> route’ at £1.9M.</p> <p>Ongoing maintenance costs are specified at a modest £24K annually which would be more than covered by social, economic and tourism benefits.</p>
<p>10/10/25 Greenwood to Lightwood (as constituency MP)</p>	<p>“This is compared to the cost of £7.5m to carry out the essential safety works which involves stabilising the shafts.”</p>	<p>Misrepresentation.</p> <p>The abandonment scheme for which planning permission has been applied has an estimated cost of £12.6M.</p> <p>The cutback scheme for which £7.5M has been allocated fails to address risks at the south end of the tunnel where “there is the potential to cause substantial settlement in the ground at surface level”, according to NH’s Planning Statement.</p> <p>The shafts were stabilised as part of the 2020/21 works using methods which have a minimum design life of 60 years. The risk level presented by the shafts is low and no “essential safety works” are currently necessary.</p>
<p>10/10/25 Greenwood to Simon Lightwood MP (in a constituency context)</p>	<p>“It was a difficult decision but one that was necessary to ensure public safety.”</p>	<p>Misrepresentation.</p> <p>There is no evidence to suggest that the tunnel currently presents any meaningful public safety risk. NH has described the risks currently presented by the shafts - the only part of the structure which interfaces with the public - as low. Enhanced security arrangements have been installed at the north end to prevent unauthorised access.</p> <p>The south end is inaccessible due to the flooding.</p> <p>There is no evidence setting out any viable mechanism whereby public safety could be affected in the future, given the strengthening works undertaken to the shafts.</p>
<p>10/10/25 Lightwood to Naz Shah MP</p>	<p>“This was significantly constraining National Highways’ ability to identify and resolve defects that could lead to a partial collapse which could severely damage properties above the tunnel shafts.”</p>	<p>Misrepresentation.</p> <p>NH has chosen not to inspect the tunnel on the basis of an implausible observation by an examiner which has not been investigated. As is demonstrated by the four-day incursion in March, safe entry into the tunnel can be achieved through the implementation of appropriate safeguards.</p> <p>The only mechanism which could result in damage to surface properties is through a collapse of one of the four shafts located in populated parts of</p>

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		<p>Queensbury. If any partial collapse occurred away from the shafts, it could not affect surface properties due to the depth of overburden.</p> <p>No.3 Shaft is supported at its base by a RamWall and grout plug which, although removable, effectively has an indefinite design life.</p> <p>No.4 Shaft is supported at its base by RamArch encapsulated in sprayed concrete. NH asserts this has a design life is around 60 years. Its contractor and Network Rail regard the design life to be 120 years.</p> <p>Nos.5 & 6 Shafts were not sunk to full depth and are therefore held up by undisturbed rock below them. When they were last fully inspected in 2015, Nos.3 & 4 Shafts were recorded as being in Fair condition. Nos.5 & 6 Shafts have not been fully inspected. They could be infilled without prejudicing the proposed active travel route.</p> <p>Jacobs 2016 Queensbury Tunnel Options Report reaches conflicting views about the possibility of damage to surface properties. It states that “The shafts are believed to be surrounded by competent rock and in the event of a lining failure surface subsidence could be minimal to non-existent.”</p> <p>In 200 years of railway history, there has been no recorded case of a ventilation shaft collapsing.</p> <p>The 1953 collapse of a shaft at Clifton Hall Tunnel, Salford involved a hidden, backfilled construction shaft about which there were no records or knowledge. The risks associated with this shaft had therefore never been managed. NH often cites this event as justification for the abandonment of Queensbury Tunnel, but it has no relevance as the circumstances are entirely different.</p>
24/11/25 Greenwood to QTS	<p>“both safety and value for taxpayer money are our priorities.”</p> <p>“in the absence of both Bradford and the West Yorkshire Combined Authority committing funding to develop the Queensbury Tunnel, and the fact that it remains closed to the general public, it would not have been fiscally responsible to continue to maintain the tunnel as a potential greenway.”</p>	<p>Misrepresentation.</p> <p>There is considerable uncertainty as to the cost of safely and appropriately abandoning the tunnel. The value-for-money from abandonment has not been quantified as there has been no estimate of likely future tunnel maintenance requirements and costs as a disused asset, noting that £7.5M has already been spent on long-term strengthening and stabilisation works to the shafts and sections in the poorest condition.</p> <p>If it was decided to undertake a £250K programme of routine maintenance works to the tunnel every ten years, it would take 300 years to spend the £7.5M allocated to abandonment or 500 years to spend the £12.6M which the scheme submitted for planning permission would likely cost (disregarding inflation).</p> <p>Abandonment will deliver no measurable public benefit.</p> <p>In contrast, repurposing the tunnel would deliver</p>

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		<p>high value-for-money, as quantified in the Sustrans study. If the AECOM repair scheme was implemented, the associated benefits would likely reach £4 for every £1 spent.</p> <p>For this claim to be sustainable, value-for-money assessments of both abandonment and repurposing would have to be undertaken.</p>
<p>24/11/25 Greenwood to QTS</p>	<p>“National Highways’ lawyers have reviewed the conveyancing agreement which you kindly provided, and their legal opinion is that Clause 5 clearly transfers that responsibility to the landowner and it is therefore not, National Highways’ responsibility.”</p>	<p>Disputed.</p> <p>The conveyance does not transfer responsibility of any part of the tunnel to anybody. It specifically excludes the tunnel and shafts from the sale. Clause 5 <i>does</i> release the Secretary of State, as the tunnel’s current owner, from the responsibility of undertaking any works in order to ensure that there is no interference of the surface landowner’s ability to enjoy their property. However, this does <i>not</i> release the Secretary of State from their duty-of-care obligations to members of the public using the rights of way which run across and alongside the tunnel at its south end.</p> <p>Responsibility to maintain the tunnel rests solely with the Secretary of State through NH.</p>
<p>24/11/25 Greenwood to QTS</p>	<p>“the government does not have funding available to keep it open”</p>	<p>Untrue.</p> <p>The Government clearly does have the money to keep the tunnel open, but it has chosen not to allocate funding for that purpose.</p> <p>QTS is not directly campaigning for the tunnel to be reopened at this time, only for the option of doing so in the future to be retained.</p>
<p>30/3/26 Lightwood to Daniel Zeichner MP</p>	<p>“the relative benefits of routes utilising the tunnel against those using non-tunnel routes were very similar and there was no compelling case to use the tunnel.”</p>	<p>Untrue.</p> <p>This is a similar claim to the one made by Ms Greenwood in her letter to QTS on 9 July 2025. Only one option was developed that does not use the tunnel. In its feasibility study, Sustrans describes it as “a highly compromised solution” presenting “numerous design challenges”, “constrained highway conditions”, “steep or extended gradients” and would be “extremely challenging to deliver”.</p> <p>Specifically, several interfaces with busy roads and 640 feet to climbing would result in this option being unsafe and undesirable for most users. It would also be almost double the length of the tunnel route (3.7 miles against 1.9 miles).</p> <p>Sustrans’ study <i>did</i> make a compelling case to use the tunnel as no other viable option could be developed. The relative benefits of the tunnel and surface route options are <i>not</i> similar.</p>

Where a contested statement features in more than one letter (as is the case with many), it is only included once in the above summary.

We have excluded from this analysis the presentation given by Ms Greenwood to multiple stakeholders at a meeting held in Westminster on 22 July 2025 which exhibited significant bias in favour of abandonment and multiple misrepresentations.

Basis of the complaint

It might reasonably be asserted that these three Members have been ‘played’ by civil servants. We concede that their letters likely reflect what they have been told; it cannot be expected that they would otherwise have a detailed knowledge of the issues around Queensbury Tunnel which is a matter of little significance to central Government.

However, notwithstanding this, the Code of Conduct for Members of Parliament takes into account the Seven Principles of Public Life, including Objectivity and Honesty. It is clear to us that the decision to abandon Queensbury Tunnel has *not* been made “impartially, fairly and on merit, using the best evidence and without discrimination or bias”. Some of the statements made in the Members’ letters are demonstrably untrue.

There are also concerns around Openness and Accountability, including Mr Lightwood’s refusal to allow us to attend a meeting he held with two local MPs to discuss the tunnel. We were told to remain in a room nearby.

We assert that these matters constitute a failure on the Members’ part to “base their conduct on a consideration of the public interest”, as set out in Rule 2 of the Code. From both economic and social perspectives, abandonment is not in the public interest: no value will be derived from it and it will prevent a positive high-value alternative being pursued in the future which would improve people’s lives in tangible ways.

For the avoidance of doubt, we are not seeking to raise with you a one-off occurrence which might reasonably be attributed to error or misunderstanding. Neither are we alleging that the relevant Members have deliberately lied. However, this has no bearing on the impact: hundreds of people have been misled through the sustained perpetuation of untruths and misrepresentations by these Members.

It is also worth confirming that we are not taking this action simply because we do not like the decision. There are reasonable grounds to believe that it has been made on the basis of a biased presentation of selectively chosen evidence, with the intention of securing the outcome preferred by civil servants. This has only become fully apparent over time, after the deadline to seek a Judicial Review had passed. We are not suggesting that the decision resulted from arguable errors of law or would meet the high threshold of Wednesbury irrationality, but we do believe the Members’ conduct in making it and communicating it has been inappropriate and warrants investigation.

Our concerns also have broader significance in the context of the public's expectation that important decisions will always be made and communicated carefully, objectively, holistically and truthfully. It is reasonable to presume that Queensbury Tunnel will not be the first difficulty that a Government has sought to resolve through unjustified action, masked by misinformation.

Whilst recognising that campaigns can be a source of political frustration, they are also vital cornerstones of our democratic system and a legitimate means by which communities can stand up for themselves. If they are to be shut down, it should be only on appropriate grounds - that their position is unsustainable or aspirations unachievable. Neither is true in our case.

We are under no illusions as to the burden of responsibility borne by Members. This is not a course of action we would have chosen but, at some point, a line has to be drawn and Members reminded of their obligation for objectivity and honesty. They are appointed by the electorate and their duty is to act in the public's best interests, not that of civil servants.

The issues outlined herein speak to the public's diminishing respect for politicians and the sense that many are dishonest, cannot be trusted and are out of touch. This manifests itself in poor turnout at elections and the rise of parties that use conflict and division to gain headway. As Commissioner, we presume this reality is a cause of concern.

These three Members should have been more robust and proactive in challenging what they were being told, knowing the extent to which their stated position was being challenged and undermined by the available evidence which, when considered in the whole, does not support abandonment. Their failure has the potential to deny communities an inspiring resource which would deliver social and economic benefits for generations to come.