Lilian Greenwood MP
Minister for the Future of Roads
(by email to [redacted])

11 July 2025

Dear Ms Greenwood

Queensbury Tunnel

Thank you for your letter of 9 July 2025, the contents of which are noted.

At your earliest convenience, could you please confirm the date on which your decision was made. We also request a copy of the formal written advice received from National Highways (NH) in relation to this matter and an estimate of costs for the proposed tunnel abandonment scheme. We believe that both should available for public scrutiny before any works that are prejudicial to community aspirations are allowed to begin.

We note that NH's contractor is already seeking to establish rental agreements with landowners for compound space, which appears to suggest that NH regards the granting of planning permission to be pre-determined. We regard this as wholly inappropriate.

The Queensbury Tunnel Society (QTS) recognises that construction of an ambitious active travel scheme with multiple associated uncertainties is difficult to advocate given current financial constraints, despite the clear economic and social benefits it would bring, as evidenced by Sustrans. We also agree that public expenditure must deliver best value for money. We observe, however, the government's willingness to invest huge sums on road schemes with very low BCRs.

In terms of your letter, we fundamentally disagree with much of its content. In our view, it does not reflect the current risk profile of the tunnel, does not fully set out the available asset management options, does not take account of the tunnel's broader strategic value, fails to recognise the safety and user-experience implications of the cheaper 'Alpine' active travel option, misrepresents the comparative benefits of the two potential active travel routes, and fails to explain how further expenditure on Queensbury Tunnel would deliver any value to the taxpayer given the prevailing circumstances.

[redacted]
[redacted]@queensburytunnel.org.uk
[redacted]

Public safety

Every legacy structure "continues to deteriorate" and National Highways' asset management regime for the Historical Railways Estate (HRE) is built around an acceptance of that reality. It is neither necessary nor financially viable to intervene and 'reset' a structure's condition unless that deterioration is approaching a point that can no longer be tolerated. Network Rail and local authorities typically set that threshold at a higher level than National Highways due to budget constraints and their less risk-averse approach.

NH and QTS disagree about the level of risk presented by the shafts at Queensbury Tunnel. In 2018, cross sections produced by AECOM from point cloud modelling[1] found no significant deformation at any of the shafts except in the sidewall below No.2 Shaft, which is now infilled. The condition of the shafts' support structures remained Fair.

Now however, as a result of the works programme carried out by NH between 2018 and 2021, Nos. 8, 6 and 4 Shafts[2] already benefit from *additional* support (sprayed concrete and Ramarch) which effectively renders the original lining redundant; No.3 Shaft benefits from an additional (albeit suboptimal) mass support structure beneath it; No.2 Shaft was infilled unlawfully in 2019 under misapplied emergency permitted development rights; No.1 Shaft remains unsupported, but is sited in a remote hillside location, 50m from an industrial building and 250m from the nearest dwelling. Therefore, the residual public risk presented by the shafts is very low.

Some repairs were carried out to the lining as part of the same works programme and the section that was historically in the worst condition now benefits from limited protective support by Ramarch. Away from the shafts and entrances, the tunnel is so far below ground (300-420 feet (91-128 metres) through its central section) that any collapse of the lining could not migrate to the surface[3]. This is demonstrated by the two small partial collapses that occurred in 2013 and 2014 which only migrated a few feet before largely stabilising. Therefore, the residual public risk presented by the lining between Nos. 1 & 8 Shafts (90% of the tunnel) is now also very low.

[1] Queensbury Tunnel Phase 2: Examination Survey Report (AECOM for CBMDC)

[2] Work was never started on No.7 Shaft and both Nos.5 & 6 Shafts were abandoned before they had been sunk to their intended depth. No.6 Shaft represents slightly greater risk as NH has been unable to establish its depth.

[3] Accepted mining convention states that collapses migrate towards the surface, over time, by a maximum of 10x the height of the seam, i.e. 10x21 feet=210 feet, in the case of Queensbury Tunnel.

The lining between the south portal and No.1 Shaft, and the north portal and No.8 Shaft, remains in generally Fair condition. The land above the north section is remote and steeply graded, with no public access. The geological conditions around the south section - which is steeply graded and remote from habitation - are such that any lining collapse is unlikely to migrate to any extent, as demonstrated by a small existing failure close to the portal.

The south portal is under water - and therefore inaccessible - due to the shutting-down of a pumping station after NH failed to pay the associated rent for three consecutive years. The north portal is secured by a substantial steel barrier. Therefore, the residual public risk presented by the sections of lining closest to the portals is now also very low, even if an unauthorised person was to gain entry at the north end.

When NH completed its works programme in 2021, Richard Marshall, NH's former HRE Director stated that "Our work strengthened the tunnel to prevent further uncontrolled collapses, ensuring that any future plans for the re-use of the structure can be realised."[4]

As you observe, the tunnel will inevitably have deteriorated over the intervening four years, but - even if perceptible - that deterioration has no meaningful public safety impact, such is the nature of masonry structures and Queensbury Tunnel's current risk profile. There is therefore no legitimate basis for a further intervention at this time.

We do not accept your assertion that "[the tunnel] cannot be left to deteriorate any further". We cannot identify any plausible failure that would result in heightened public safety risk. So, on the contrary, the tunnel *can and should* be left to slowly deteriorate, for the sake of public finances.

If NH convinces you that a further investment of taxpayer funds is needed at Queensbury Tunnel despite its current low risk profile, you must understand the precedent you are setting. For example, CLG/36 Great Western Road Tunnel is a near-surface structure of ~711 yards in length that runs directly beneath a major arterial road (A82) and some buildings close to the centre of Glasgow. SVB/43 Bridgnorth Tunnel, 559 yards long, passes less than 55 feet below multiple buildings in the town centre and has a hidden construction shaft of unknown condition just outside the Town Hall, in the middle of the High Street.

The risk levels presented by these tunnels, and others, are arguably greater than those now associated with Queensbury Tunnel. Is the government going to fund multi-million pound abandonment schemes at these structures too?

[4] https://www.newcivilengineer.com/latest/queensbury-tunnel-national-highways-completes-problematic-repair-of-disused-yorkshire-tunnel-06-10-2021/

Project risk

When NH started its works programme in Queensbury Tunnel in October 2018, the intention was to spend four months installing Ramarch below each shaft for the purposes of future safe access. The contracted cost of those works was £550K. But they actually ended three *years* later after £7.2M had been spent on the structure. The cost and schedule spiralled out of control as a result of serious project management failings by NH/Jacobs and a lack of appropriate oversight from the Department for Transport.

The abandonment scheme that would have followed the preparatory works described above was costed at £3M in 2018, since when inflation has pushed up prices by around 30%. Given the uncertainties and challenges associated with delivery of the abandonment scheme at several sites throughout Queensbury, there can be little confidence that those same failings will not again result in a heavy additional burden being placed on the taxpayer, beyond whatever price estimate NH has given you.

Strategic transport asset

You suggest that there are other "less costly greenway options which do not use the tunnel that can be delivered, and that these options would provide the same or similar active travel benefits to the local community". We do not recognise any validity in this assessment.

Sustrans describes the so-called Alpine (surface) route developed as part of its Bradford-Halifax Greenway study as "valuable for the purposes of comparison", but offers a "highly compromised solution" with a poor user experience and no heritage benefits.

The 3.7-mile path would feature four sections of sustained ascent/descent which rise/fall 335 feet (102 metres), 170 feet (52 metres), 213 feet (65 metres) and 308 feet (94 metres). Some short sections would not comply with the best-practice guidance set out in LTN 1/20[5]. It would involve several road interfaces (at least one requiring congestion-creating traffic control) including an on-road section of 310 yards (283 metres) along the busy A644 and A647, through their intersection. This raises obvious safety concerns, rendering the route inappropriate for family use. Unrecorded mine workings at its southern end present considerable uncertainties around delivery.

On the other hand, a route through the tunnel would measure 1.9 miles in length and involve an ascent/descent of just 75 feet (23 metres), at a gentle gradient of 1 in 100.

[5] Guidance for local authorities on designing high-quality, safe cycle infrastructure.

Whilst it is likely - but not certain - that the cost of a surface route would be cheaper than one through the tunnel, it is undesirable in almost every other respect. We note you do not mention the word "quality". Whilst such a route would provide a difficult active travel option for those living in the west part of Queensbury, it would categorically not deliver "the same or similar active travel benefits" for Bradford-Halifax commuters or those seeking to travel between other communities either side of the topographical divide that is circumvented by the tunnel; neither would it attract any meaningful leisure or tourist use.

According to the Sustrans study, a route through the tunnel would generate £3.01 in social, economic and tourism benefits for every £1 spent on it. If the refurbishment cost for the tunnel had been based on an updated, inflation-adjusted version of AECOM's proportionate 2018 study for CBMDC, those benefits would be around £4 for every £1 spent.

It should be noted that Jacobs' tunnel study included £1.6M for an unnecessary investigation of the overbreak, £195K for an unnecessary forced ventilation system and £11.2M to unnecessarily spray 2,050 yards of the tunnel lining with concrete, thus destroying its heritage value. The company's remediation figure of £26.4M reflected a disproportionate, gold-plated approach to remediation and complete misunderstanding of the broader requirements.

Beyond active travel, we note that your letter fails to make any reference to the West Yorkshire Mass Transit System, outline proposals for which identify Queensbury Tunnel as the potential route for a future extension of the network to Halifax/Calderdale[6]. We trust you consulted with Tracy Brabin, the Mayor, and officers from West Yorkshire Combined Authority prior to making your decision.

We note also that NH has not consulted its Stakeholder Advisory Forum over Queensbury Tunnel's abandonment, in clear breach of the policy agreed with the previous government which halted NH's infilling and demolition programme pending the establishment of "a formalised framework and engagement process for [HRE] structures to understand, in each case, whether there is a realistic prospect of it being used for active travel or other transport purposes in future; *and to ensure that the views of local stakeholders, including active travel groups* and the local authority, *are fully taken into account.*"[7]

[6] West Yorkshire Mass Transit Vision 2040, published in August 2023, states that "Options will be considered for Mass Transit to use the disused Queensbury railway tunnel, although the initial priority is that it is retained and becomes a walking and cycling route."

[7] Gear Change: One Year On (DfT, 2021)

Indeed, NH has specifically refused to engage with QTS despite your colleague Simon Lightwood MP, Minister for Local Transport, instructing the company "to meet with [us] to address matters relating to the technical and engineering aspects of the tunnel".[8]

In March 2020, the Secretary of State for Transport "specifically prevented"[9] the abandonment of Queensbury Tunnel, recognising it as a transport asset for future active travel, tram or light rail use. Given this potential and your government's commitment to invest in infrastructure improvements across the North, we are unclear as to why you have decided to support abandonment now when the risks presented by the tunnel are lower as a result of the 2018-21 works programme.

Queensbury Tunnel is a substantial and complex legacy structure, presenting both challenges and opportunities. Your proposed course of action is a complete and pointless waste of public funding - throwing good money after bad - and would prevent the region from benefiting from those opportunities when fortunes upturn.

Thousands of people recognise the tunnel's importance as a social, historic, economic and transport asset, and support its repurposing. Many will see this destructive act - using *their* money - as another example of perverse, out-of-touch decision-making from a government perceived as having nothing positive to offer. It plays into the hands of those seeking to create tension within deprived communities and the socially disenfranchised - of which there are many locally - who feel they are always overlooked.

We urge you to reconsider your decision based on a balanced appraisal of the current circumstances by a suitable independent body and look forward to meeting you on 21 July to discuss the matter further.

Yours sincerely

[redacted]

Graeme Bickerdike

Engineering Coordinator, Queensbury Tunnel Society

cc

Tracy Brabin: Mayor of West Yorkshire
Robin Tuddenham: Chief Executive, Calderdale Council
Judith Cummins MP, Naz Shah MP, Kate Dearden MP
Ruth Cadbury MP: Chair, Transport Select Committee
[redacted]

Lorraine O'Donnell: Chief Executive, Bradford Council
Relevant Bradford Council officers
Cllr Alex Mitchell, Cllr Hazel Johnson, Cllr Alex Ross-Shaw
Helene Rossiter: Head of HRE, National Highways
[redacted]

[8] Instruction set out in Ministerial letter to QTS on 3 February 2025.

[9] https://www.thetelegraphandargus.co.uk/news/18275434.transport-secretary-backs-plan-reopen-queensbury-tunnel---stating-used-light-rail/