



## UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT

Former Kempston Hardwick Brickworks  
and adjoining land, Bedford

### Chapter 13 – Socio-Economics

Report reference: 2.13.0

Revision number: 00

Date: June 2025





# CONTENTS

---

<b>13.</b>	<b>SOCIO-ECONOMICS</b>	<b>1</b>
13.1.	INTRODUCTION	1
13.2.	ASSUMPTION USED TO INFORM THE ASSESSMENT	1
13.3.	ENGAGEMENT, STUDY AREA AND SCOPE	1
13.4.	METHODOLOGY	15
13.5.	BASELINE CONDITIONS	19
13.6.	ASSESSMENT OF POTENTIAL EFFECTS, MITIGATION AND RESIDUAL EFFECTS	61
13.7.	ASSESSMENT SUMMARY	93
13.8.	REFERENCES	102

---

## TABLES

Table 13-1 – Summary of engagement undertaken	2
Table 13-2 – Study areas considered	4
Table 13-3 – Elements scoped in to the assessment during the Construction Phase	8
Table 13-4 – Elements scoped into the assessment during the Operational Phase	10
Table 13-5 – Elements scoped out of the assessment	13
Table 13-6 – Sensitivity criteria	16
Table 13-7 – Magnitude of impact	17
Table 13-8 – Significance of effect for Socio-Economics	18
Table 13-9 – Working age residents employed in construction, 2021	19
Table 13-10 – Average distance travelled to work by construction workers, 2022	20
Table 13-11 – Economic activity and employment rate of working age residents across geographies, October 2023 to September 2024	20
Table 13-12 – Proportion of the economically inactive population that want a job across comparator study areas, September 2023 to October 2024	21
Table 13-13 – NEET statistics by study area, 2023	21

---

Table 13-14 – Yearly requirement of construction workers between 2024 and 2028	22
Table 13-15 – Highest level of qualification achieved across geographies (2021)	23
Table 13-16 – Highest level of qualification for construction workers compared to remainder of the population across study areas, 2021	24
Table 13-17 – CSA average wages, 2023	25
Table 13-18 – Provision of construction apprenticeships 2021/22 academic year	26
Table 13-19 – Estimated available accommodation stock by numbers of bedrooms	28
Table 13-20 – Available PRS dwellings and bedrooms by study area	28
Table 13-21 – Rental values per month by property size across study areas, 2022/23	29
Table 13-22 – Percentage difference in CSA rental values by property size compared to comparators (2022/2023)	29
Table 13-23 – Percentage difference in SRCA rental values by property size compared to comparators (2022/2023)	29
Table 13-24 – Businesses in the Local Area of the Site	31
Table 13-25 – Provision of officers and proportion of officers in front line roles by LAD and police force, 2024	35
Table 13-26 – Attendance at the top 25 global theme parks in 2019, 2022 and 2023	37
Table 13-27 – Global top 25 theme park provision per million population and tourism arrivals, 2023	39
Table 13-28 – Merlin attraction attendance figures 2019, 2023	40
Table 13-29 – Total visits, nights and spend in the UK by international visitors, 2019 and 2023	42
Table 13-30 – Total trips, nights and spend in Great Britain by domestic overnight visitors, 2019 and 2023	42
Table 13-31 – Total GVA output across specific sectors and across the economy (England) (2018, 2022)	44
Table 13-32 – Retail vacancy rates	45
Table 13-33 – Retail employment as a proportion of overall employment across study areas (2022)	46
Table 13-34 – Largest visitor attractions in the SRCA by annual visitors (2023 unless stated)	47
Table 13-35 – Estimated total retail and F&B turnover across the CSA and SRCA (in £s), 2031 and 2051	49
Table 13-36 – Population percentage growth, 2014-2023	49

Table 13-37 – Median annual gross pay, residence based, 2023	50
Table 13-38 – Working age residents employed in retail and tourism sectors, 2021	50
Table 13-39 – Employment growth across study areas between 2015 and 2023	51
Table 13-40 – Projected population growth across areas in the absence of the Proposed Development	52
Table 13-41 – Economically active population projections across the CSA and SRCA by 2031 and 2051	53
Table 13-42 – Residential employment projections across local authorities that comprise the SRCA by 2031 and 2051	53
Table 13-43 – Employment projections across study areas	54
Table 13-44 – GCSE standard pass attainment in English and Maths by FSM status, 2021/22 academic year	56
Table 13-45 – Percentage of schools rated good or outstanding by Ofsted (2024)	56
Table 13-46 – Sensitivity of receptors for each effect	60
Table 13-47 – Assessment of potential effects, additional mitigation, residual effects and monitoring during construction	61
Table 13-48 – Assessment of potential effects, additional mitigation, residual effects and monitoring during operation	72
Table 13-49 – Net additional GVA across various geographies, 2031	75
Table 13-50 – Net additional GVA across various geographies, 2051	75
Table 13-51 – Disneyland Paris trip purpose breakdown by visitor group	78
Table 13-52 – Visitor expenditure by visitor type	78
Table 13-53 – Net visitor expenditure by study area	79
Table 13-54 – Net visitor expenditure, excluding hotels, by study area	80
Table 13-55 – Net additional employment, 2031	84
Table 13-56 – Net additional employment, 2051	84
Table 13-57 – Hotel bedrooms demand (in addition to on-Site provision) across the CSA and SRCA	87
Table 13-58 – One effect changes significance as a result of the cumulative assessment	92
Table 13-59 – Summary of socio-economic effects	95

---

## FIGURES

---

Figure 13.1 – Map of study areas	6
Figure 13.2 – Unemployment rate and economic inactivity rate by highest qualifications achieved, CSA	24



## 13. SOCIO-ECONOMICS

---

### 13.1. INTRODUCTION

- 13.1.1. This chapter has been prepared in support of the planning proposal for the Proposed Development as described in **Chapter 2: Description of the Proposed Development (Volume 1)** of the Environmental Statement. This reports the outcomes of likely significant effects arising from the Proposed Development upon Socio-Economics during construction and operation.

#### SUPPORTING DOCUMENTATION

- 13.1.2. This chapter is intended to be read in conjunction with the following supporting appendices and documents:
- **Chapter 0: Table of Contents (Volume 1);**
  - **Appendix 0.1 Glossary and Acronyms (Volume 3)**
  - **Appendix 2.1: Environmental Statement Basis of Assessment (Volume 3);**
  - **Appendix 3.1: Legislation, Policy and Guidance for all ES Technical Topics (Volume 3);**
  - **Appendix 3.2: Significance Criteria for all ES Technical Topics (Volume 3);**
  - **Appendix 3.3: Assessment of Dwellings within the Site Boundary (Volume 3);**
  - **Appendix 13.1: Temporary Workforce Accommodation Strategy (Volume 3);**
  - **Equalities Information Report (Document Reference 6.6.0); and**
  - **Employment and Skills Plan (Document Reference 6.12.0).**

#### LEGISLATIVE FRAMEWORK, POLICY AND GUIDANCE

- 13.1.3. The legislation, policy and guidance relevant to the assessment of Socio-Economic effects associated with the Proposed Development is detailed in **Appendix 3.1: Legislation, Policy and Guidance for all ES Technical Topics (Volume 3)**.

### 13.2. ASSUMPTIONS USED TO INFORM THE ASSESSMENT

- 13.2.1. The assessment presented in this chapter has been based on the Proposed Development as described in **Chapter 2: Description of the Proposed Development (Volume 1)**. This chapter has also used the assumptions presented in **Appendix 2.1: Environmental Statement Basis of Assessment (Volume 3)** to build on the information in **Chapter 2: Description of the Proposed Development (Volume 1)**, to support undertaking an assessment of a cautious worst case (where the phrase “cautious worst case” is used it means “*a cautious worst case that provides a robust assessment of likely significant effects*”).

#### ENGAGEMENT, SCOPE AND STUDY AREA

##### ENGAGEMENT

- 13.2.2. **Table 13-1** provides a summary of the engagement activities undertaken in support of the preparation of this assessment.



**Table 13-1 – Summary of engagement undertaken**

Meeting subject	Body/organisation	Meeting dates and other forms of engagement	Summary of outcome of discussions
Healthcare, policing and fire	<ul style="list-style-type: none"> <li>NHS Bedfordshire, Luton and Milton Keynes (BLMK) Integrated Care Board (ICB) and Integrated Care</li> <li>NHS Bedfordshire Hospitals Foundation Trust</li> <li>Bedfordshire Constabulary</li> <li>Bedfordshire Fire &amp; Rescue Service</li> </ul>	<p>8 April 2024</p> <p>In person meeting</p>	<p>The project is generally supported, particularly praised for its job creation potential. There are concerns about the project increasing demand for health services and the ability to meet increased housing demands in a timely manner. The NHS has reservations about an on-Site healthcare facility, preferring to manage services to prevent staff attrition to the private sector. The fire service raised concerns over safety issues related to an increase in temporary housing during construction. Stakeholders were encouraged to continue contributing feedback and engage with Bedford Borough Council (Bedford BC) to address these concerns effectively.</p> <p>The factors raised have been taken into consideration in determining the impacts on the emergency services during both construction and operation. This is also explicitly factored into the proposed mitigation.</p>
Business groups	<ul style="list-style-type: none"> <li>Bedford Business Improvement District (BID)</li> <li>Bedfordshire Employment and Skills Academy</li> <li>South East Midlands Careers Hub</li> </ul>	<p>9 April 2024</p> <p>In person meeting</p>	<p>Business groups expressed strong enthusiasm and support for the proposals, emphasising its transformative potential for Bedford businesses and its people. Attendees encouraged participation from school groups and meetings with career leads. Business groups stated they would respond positively with their views to the engagement survey and distribute it more widely (for example to school groups and careers leads) where possible. Their support for this project mirrors their ongoing involvement with the East West Rail (EWR) project.</p> <p>These business viewpoints have been taken into consideration when considering any effects which impact businesses (including trade, economic output, expenditure, employment and skills effects).</p>

Meeting subject	Body/organisation	Meeting dates and other forms of engagement	Summary of outcome of discussions
Tourism and destination groups	<ul style="list-style-type: none"> <li>Woburn Safari Park</li> <li>Centre Parcs Woburn Forest</li> <li>London &amp; Whipsnade Zoo</li> <li>Experience Bedfordshire</li> <li>Visit England</li> </ul>	15 April 2024	<p>The response to the project from tourism businesses and groups is overwhelmingly positive, with some concerns about the adequacy of existing infrastructure to handle increased traffic and environmental impacts. Public sentiment is emphasised as crucial for garnering government support for necessary infrastructure improvements. The group reported that a recognised need exists for more hotel accommodation and larger conference facilities in the area in order to support growth. The project is viewed as a catalyst for further development and collaboration between Universal Destination &amp; Experiences (UDX) and local attractions to enhance infrastructure and visitor management. These viewpoints have been taken into consideration when considering potential effects on visitor accommodation, additional expenditure, trade creation, and conference and exhibition provision.</p>
Summary of Agreed Positions	<ul style="list-style-type: none"> <li>Bedford BC</li> </ul>	April – May 2025	<p>A series of agreed positions have been developed through ongoing discussions with statutory bodies and key stakeholders. These positions reflect a collaborative process aimed at aligning the project with regulatory expectations, addressing stakeholder priorities and ensuring a shared understanding of key issues. Key to socio-economics is the agreed position with Bedford BC, who agree to the roles and responsibilities of the Parties in the <b>Employment and Skills Plan (Document Reference 6.12.0)</b> and the monitoring measures set out in <b>Appendix 13.1: Temporary Workforce Accommodation Strategy (Volume 3)</b>.</p>

## EXTENT OF THE STUDY AREA

- 13.2.3. The geographical extent of potential Socio-Economic effects from the Proposed Development may vary widely, dependent on the nature of the effect. A proportionate approach is taken in applying judgment to decide upon appropriate study areas for different effects. It is impossible to identify every possible exact geographical area over which effects could be felt, and so the most appropriate geographies over which each effect is likely to be felt are utilised. Office for National Statistics (ONS)

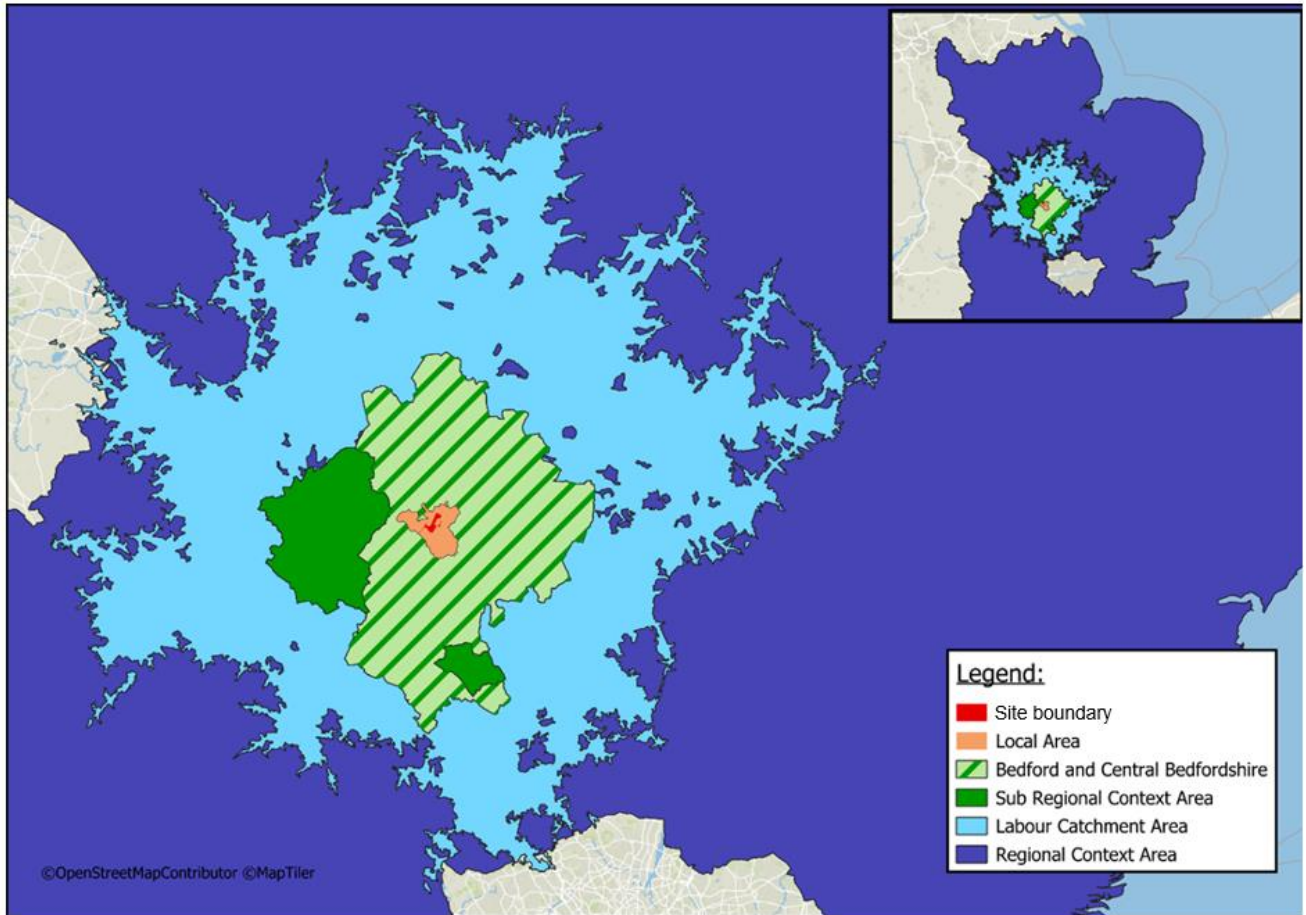
statistical geographies have been used to define the various study areas. When defining study areas, the likelihood of significant effects must also be taken into consideration when applying this proportionate approach. One example is the labour catchment area (LCA), which is the area from which the majority of workers will likely be drawn. Whilst some people might commute further than this, the numbers are likely to be low and thus in the context of those wider areas and their labour markets, such effects will not be significant.

- 13.2.4. The study area does not necessarily capture where the receptor originates, rather it indicates where the socio-economic effect is expected to occur. For example, were any businesses expected to be displaced as a result of the Proposed Development they would be within the Site (the Site as listed in **Table 13-2**), but the people who work at these businesses would be unlikely to live within this immediate study area as there are few residential properties. Where receptors are workplace based rather than residence based this is explicitly stated. The study areas are described in **Table 13-2** and shown visually in **Figure 13.1**.

**Table 13-2 – Study areas considered**

Geographical study area	Definition
Site	Red line boundary
Local Area	Lower layer super output areas (LSOAs) that intersect with a 500m boundary around the Site. There are 33,755 LSOAs in England, which comprise of between 400 and 1,200 households and have a usually resident population between 1,000 and 3,000 persons. The Local Area is made up of 12 of these LSOAs – 10 in Bedford and two in Central Bedfordshire. These LSOAs are: Bedford 018E; Bedford 018G; Bedford 018H; Bedford 020B; Bedford 020C; Bedford 020D; Bedford 020E; Bedford 020F; Bedford 022B; Bedford 022C; Central Bedfordshire 008F; and Central Bedfordshire 008G.
Core Study Area (CSA)	The Site is located within the local authority of Bedford, but it is located at the south of the local authority. As described above, the 500m radius around the Site goes into the district south of Bedford – Central Bedfordshire. For this reason, the CSA is defined as the combined local authority boundaries of Bedford and Central Bedfordshire local authorities. Where the effect significance could change if considered at an individual local authority level this is considered and discussed.
Sub Regional Context Area (SRCA)	The local authority boundaries of Bedford, Central Bedfordshire, Milton Keynes and Luton. Where effects can be disaggregated at an individual local authority level within the SRCA, this is provided and discussed.
Labour Catchment Area (LCA)	Defined as a 60-minute travel time by car or public transport to the Site. It has been assumed that workers will commute from within this distance. This boundary has been introduced to make sure that labour supply analysis is based on a realistic and practical commuting area. Other large infrastructure projects have also used a 60-minute catchment area. The LCA is defined as the current 60-minute travel time by car or public transport to the Site, not including transport infrastructure to be delivered by the Proposed Development. The LCA will increase in size with the infrastructure delivered by the Proposed Development which will potentially expand the LCA of the Site. Any future

Geographical study area	Definition
	<p>increase in the LCA will result in more labour available thus reducing pressure on the labour market.</p> <p>Where possible, data is collected in this area utilising Middle layer super output areas (MSOAs) that are at least half inside the boundary. There are 6,856 MSOAs in England, they comprise between 2,000 and 6,000 households and usually have a resident population between 5,000 and 15,000 persons. For 377 MSOAs, at least half their area overlaps with the 60-minute travel time boundary. MSOA data is used as recognised data sources typically provide demographic and socio-economic data at this level, which covers a sufficiently large population size to be meaningful while still providing insights at a granular level. The 50% MSOA boundary has been introduced to make sure that the data collected accurately reflects the demographics and socioeconomic characteristics of the LCA. Including MSOAs with at least 50% of their geography within the LCA prevents data from areas largely outside of the LCA influencing conclusions on demographics and socioeconomic characteristics of the LCA.</p> <p>Where it is not possible to collate data at the MSOA level, local authorities that are at least half within the 60-minute travel time distance are used as a proxy for the LCA. There are 309 local authorities in England, of which 22 overlap by at least half their area with the 60-minute travel time boundary.</p>
Regional Context Area (RCA)	Bedford is located within the East of England, but it borders the East Midlands to the north and the South East to the west. The Regional Context Area is therefore made up of these three regions – East of England, East Midlands and the South East.
National Area	UK and England (UK preferable where data allows).



**Figure 13.1: Map of study areas**

## SCOPE OF THE ASSESSMENT

- 13.2.5. A formal Environmental Impact Assessment (EIA) scoping process has not been undertaken in support of the preparation of this assessment. However, this assessment has been undertaken in line with best practice guidance, engagement with statutory bodies and using professional judgement.
- 13.2.6. The assessment considers the potential for the Construction and Operational Phases of the Proposed Development to result in likely significant effects.

## Receptors

- 13.2.7. Receptors are people who could experience potentially significant effects as a result of the construction and operation of the Proposed Development. These are classed as follows:
- **Businesses:** owners of businesses, property, and visitor accommodation, both within and surrounding the Site, who experience changes in the environment, including the activity and employment (workers) supported by these businesses;
  - **Residents:** residents who experience changes in their living environment, access to employment opportunities and a new leisure attraction;

- Visitors: visitors who experience changes to the places they visit (including tourist destinations); and
- Providers of emergency services: ambulance, fire and police services.

13.2.8. The following sensitive receptors (which could be present within any of the above broader categories) have been identified and considered in determining the sensitivity of receptors to potential effects and/or proposed mitigation:

- Children eligible for free school meals (FSMs) – Across Central Bedfordshire, the gap in GCSE attainment between students that are eligible for FSMs and those that are not eligible for FSMs is wider than geographical comparators.<sup>1</sup> This has been considered in the assessment of sensitivity;
- Traveller community – Kempston Hardwick caravan site is located immediately east of the Site. As traveller groups represent a protected group, this has been considered in the assessment of sensitivity;
- Retired community – Wixams retirement village is located approximately 2km from the Site. As the retirement village is catered for over 55 year-olds, this has been considered in the assessment of sensitivity;
- Younger people – **Equalities Information Report (Document Reference 6.6.0)** demonstrates that younger people aged 0-9 are disproportionately represented at the Local Area level. This has been considered in the assessment of receptor sensitivity where relevant;
- Religious groups – in factoring in the sensitivity of community assets, where appropriate a higher presence of the relevant protected religious groups has been assumed which is therefore conservative in the assessment of sensitivity; and
- Those with long-term health issues or disabilities – Woburn Court Community Health Centre is located 270m north-west of the Site. Residents with long-term health issues or disabilities that require access to this facility have therefore been considered in the assessment of sensitivity.

### Temporal scope

13.2.9. Temporal scope refers to the years the effects have been assessed in. The assessment years are 2029 (peak construction year), 2026 to 2031 (Primary Phase construction period), 2031 (Primary Opening Year) and 2051 (Full Buildout Phase). The Full Buildout (2051) reflects the year that the Proposed Development is expected to reach peak visitor numbers that will continue indefinitely thereafter.

### Construction Phase

13.2.10. For the purpose of construction effects, it is judged that the workforce potentially required for future construction will be lower than the peak construction of the Primary Phase. Due to infrastructure improvements delivered as part of the Primary Phase, any future impact will also be experienced on

---

<sup>1</sup> Note: Children are eligible for FSMs if their parents are entitled to any of the following types of support which are typically associated with low income: Income support; Income-based Jobseeker's Allowance; Income-related Employment and support allowance; Support under Part VI of the Immigration and Asylum Act 1999; The guaranteed element of Pension Credit; Child Tax Credit; Working Tax Credit; and Universal Credit.



an improved baseline. Whilst receptor sensitivities could change over time, the relative magnitude of construction in the future will be sufficiently lower than the peak such that any changes in sensitivity of receptors would not change conclusions on the significance of effects. Effects are therefore not assessed at another temporal scope as the assessment already covers a cautious worst case. The precise details of what will be built are unknown at this stage, although it is anticipated that it will include further visitor accommodation, a conferencing facility and sports facilities. Any other commercial uses (retail, leisure food and beverage) are assumed to be proportionate to the scale of visitor increase, and so the effects of these uses are already implicitly captured within the 2051 assessments which are based around future visitor numbers, and associated expenditure and patterns of behaviour.

### Operational Phase

- 13.2.11. Effects in the Operational Phase are assessed in 2031 (Primary Opening year) and 2051 (Full Buildout Phase). The assessment of effects in 2031 consists of the activity at the Theme Park (and 500 visitor accommodation rooms). The full build out in 2051 is assumed to consist of the Theme Park, visitor accommodation and Convention Centre.

### **Identification of effects**

- 13.2.12. The elements shown in **Table 13-3** and **Table 13-4** are considered to have the potential to give rise to likely significant effects during construction and/or operation of the Proposed Development and have therefore been considered within this assessment.
- 13.2.13. The effects to be considered have been identified through professional judgment. Some are standard for all developments (such as construction employment), others are included due to the scale of the development (such as temporary impact on accommodation during construction) and others are bespoke to the specifics of the Proposed Development (such as the effect for the visitor accommodation, additional expenditure and trade creation).
- 13.2.14. The list of potential effects has been collated, in part, through a review of other major infrastructure projects, including specifically the list of effects considered within the proposed London Resort development (**Ref. 13.1**), which is the only other proposal of a similar sector and scale to the Proposed Development. A proportionate approach has been taken aligned with standard Environmental Impact Assessment (EIA) guidance, excluding those effects unlikely to be significant, and focusing on those effects most likely to either be considered sensitive or significant.

**Table 13-3 – Elements scoped in to the assessment during the Construction Phase**

Potential effect	Receptor	Study areas and justification	Temporal scope
<b>Construction employment</b> – potential temporary employment generation effects (including indirect and induced effects)	Residents	<b>LCA</b> – the LCA is used as this represents the population that will reasonably be expected to travel to and benefit from the construction employment opportunities at the Proposed Development. Similar-sized planned developments, such as Hinkley Point C and the London Resort, have utilised a comparable catchment area when assessing construction labour supply. Given the similar labour requirements of these projects, they serve as	2029

Potential effect	Receptor	Study areas and justification	Temporal scope
		reasonable benchmarks for methodological comparison.	
<b>Construction skills and training</b> – potential temporary effect of employment on the labour market, skills and training	Residents	<b>CSA</b> – Skills and training initiatives from major construction projects are generally aimed at residents of the local authority district, and aspirations and initiatives are agreed with local government. As the Proposed Development lies within Bedford but close to the boundary of the Central Bedfordshire Local Authority District, skills and training impacts are assessed with both of them in mind, and so the effect is assessed at the CSA level.	2026-2031
<b>Temporary effects on accommodation</b> – potential temporary effect of employment generation on the accommodation market (including private rented and short-term accommodation)	Residents, businesses	<b>CSA, SRCA</b> – It is likely that construction workers seeking accommodation will locate to an area around the Proposed Development that falls into the three defined geographic areas; the CSA, the SRCA, and the LCA.  While some would likely locate in the Local Area, Given the scale and nature of the workforce, it is anticipated that any requirement for overnight stays will be dispersed more broadly across the wider borough or neighbouring boroughs, where a greater supply of suitable and competitively priced temporary accommodation is available. This pattern is consistent with typical construction logistics, which often see transient workers based near major road networks or transport nodes offering better access to multiple sites.  For those workers choosing to relocate, they are doing so for the sole purpose of their place of work being the Site. It is therefore reasonable to assume they will want to be relatively close by. Whilst it is plausible that some workers will choose temporary accommodation in the LCA or potentially outside of it, the concern over accommodation stock and capacity is likely to be small given the larger geography compared to the CSA and SRCA. Only the CSA and SRCA are therefore considered.	2029



Potential effect	Receptor	Study areas and justification	Temporal scope
<b>Disruption to local business</b> – potential temporary disruption to local businesses in terms of their operations and accessibility	Business	<b>Local Area</b> – As the element refers to disruption of local businesses the analysis of this element focuses on the Local Area, where disruption from construction will most likely be experienced.	2026-2031
<b>Emergency services</b> – potential temporary effect of the increased demand for emergency services on service providers	Service providers	<b>CSA, SRCA</b> – Construction workers will place some demand on emergency services. The assessment is carried out at the CSA and SRCA levels where any emergency services utilised during construction will be felt. Who provides each type of emergency service, and over what geography it is provided, is considered and explained within the assessment.	2026-2031

**Table 13-4 – Elements scoped into the assessment during the Operational Phase**

Potential effect	Receptor	Study area	Temporal scope
<b>Trade creation</b> – potential effects of trade creation (and diversion) relating to theme parks	Businesses	<b>National</b> – The Proposed Development will provide a tourist attraction unlike any that currently exists in the UK – creating trade for a type of leisure destination which does not currently exist. While it may attract some trade away from other attractions, it is anticipated that the overall impact will be net positive as it is expected to contribute to an increase in total UK leisure visitation and enhance the UK's overall tourism offering, strengthening its position as an international visitor destination. As such, demand dynamics are assessed at the National Area level, where competition for leisure destinations of this scale and quality typically takes place.	2031, 2051
<b>Economic output</b> – potential effects of economic output on the national economy	Businesses	<b>National</b> – The Proposed Development will provide a tourist attraction unlike any that currently exists in the UK. It will attract international visitors who would not otherwise have come to the UK.  It is expected to contribute to economic output through direct activity on-Site and activity supported indirectly through visitor expenditure. Knock on visitor activity may be felt by tourism businesses across the country, given the potential for international guests to link trips both locally and/or further afield. This will provide new opportunities for businesses across the supply chain and relevant sectors.	2031, 2051

Potential effect	Receptor	Study area	Temporal scope
		This economic output effect is therefore assessed at the National Area.	
<b>Additional spending</b> – potential effect of increased visitor spending on businesses	Businesses	<b>CSA, SRCA</b> – 8.5 million people are expected to visit the Proposed Development in 2031, rising to 12 million people in 2051. The length and purpose of each visitor trip will vary, but many visitors will spend money outside of the Site as well as inside it as part of their trip. Whilst this spending would extend across the country, the impact of such spending is expected to be felt most by tourism businesses operating in the CSA and SRCA.	2031, 2051
<b>Employment</b> – potential employment generation effects (including indirect and induced effects, and characteristics of jobs generated by the project)	Residents	<p><b>CSA, SRCA, LCA, National</b> – The effect of employment generation once operational is assessed at several geographies.</p> <p>Given the location of the Proposed Development and likely commuting patterns, a large portion of the workforce will be drawn from residents near the Site (and so the CSA is considered).</p> <p>However, given the scale of employment generation, employees will be drawn from a wider area than these two districts. For this reason, the effect of the Proposed Development on direct employment generation in the Operational Phase is also assessed at the SRCA study area as this represents the area from which the majority of workers will reasonably be expected to travel to and benefit from the operational employment opportunities at the Proposed Development.</p> <p>The Proposed Development will also support indirect employment both locally and across the country through the supply chain, and induced employment through visitor expenditure. The LCA and National Areas are considered here because the largest contributor to indirect and induced jobs is the induced employment through visitor expenditure. The geographical location of visitor expenditure is driven by two factors – where visitors want to stay on the day of their visit to the Proposed Development, and where any linked trips that they make are likely to occur. Visitors are likely to want to stay either locally (CSA or the SRCA), within an hour's drive (LCA) or further afield (national, with London the largest draw). Linked trips are most likely to be at the National Area for international visitors (given London has the</p>	2031, 2051

Potential effect	Receptor	Study area	Temporal scope
		current largest draw for tourists) and more locally for domestic overnight visitors.	
<b>Skills and training</b> – potential effect of employment on the labour market, skills and training	Residents	<b>CSA</b> – It is estimated that around two thirds of the operational jobs will be taken by residents in the CSA in both 2031 and 2051. Skills and training initiatives from major employers are generally aimed at residents of the local authority district, and aspirations and initiatives are agreed with local government. As the Proposed Development lies within Bedford but close to the boundary of the Central Bedfordshire, skills and training impacts are assessed with both in mind, and so the effect is assessed at the CSA level.	2031, 2051
<b>Visitor accommodation</b> – potential effect of new visitors on the accommodation, retail, leisure and tourism market	Businesses	<b>CSA, SRCA</b> – The Proposed Development is expected to attract a large number of visitors, many of whom will stay overnight and utilise accommodation facilities. There will be 500 visitor accommodation rooms in 2031, and 6,070 across the full build out of the Proposed Development by 2051. However, the scale of visitors at the Theme Park is likely to drive further demand for visitor accommodation off-Site. It is most likely visitors who come to the Theme Park would stay in the surrounding local authorities. Therefore, this effect is assessed at CSA, SRCA levels.	2031, 2051
<b>Convention centre provision</b> – potential contribution to conference and exhibition provision	Businesses	<b>CSA, National</b> – The full build out of the Proposed Development is assumed to include the provision of a convention centre for the basis of this assessment. This is not the primary focus of the Proposed Development, and therefore relative to the national provision of conference and exhibition space, is not likely to have a significant effect. For this reason, the effect is focused on the more localised geography (the CSA) to make sure fair consideration of the existing provision within that area.  While the convention centre forming part of the Proposed Development is somewhat smaller in scale than major UK venues such as the NEC (e.g. c.55,000sqm vs larger comparators), its role and contribution are still considered appropriately at the national level.	2051
<b>Disruption of businesses</b> – potential disruption to local businesses in terms of	Businesses	<b>Local Area</b> – This element focuses on the Local Area, where some disruption will most likely be experienced.	2031, 2051

Potential effect	Receptor	Study area	Temporal scope
their operations and accessibility			
<b>Emergency services</b> – potential effect of the increased demand for emergency services on service providers	Service providers	<b>CSA, SRCA</b> – Operational workers and visitors will place some demand on emergency services. The assessment is carried out at the CSA and SRCA where any demand is likely to take place.	2031, 2051

### Elements Scoped out of the Assessment

13.2.15. The elements shown in **Table 13-5** are not considered to give rise to likely significant effects on identified receptors as a result of the Proposed Development and have therefore been scoped out of this assessment. Justification for their exclusion is provided.

**Table 13-5 – Elements scoped out of the assessment**

Element scoped out	Phase	Justification
Displacement of residential dwellings	Construction and operational	There are two residential dwellings located within the Site that will be demolished as part of this Proposed Development. These dwellings have been purchased by UDX on the open market and through mutually beneficial terms, in preparation for the construction of the Proposed Development. The small number of homes and the fact that they are now under UDX ownership result in it being considered appropriate to not assess the impacts of residential displacement, and any effect is negligible. The implications should the other 17 residential dwellings contained in the Site experience of a change of use is considered in <b>Appendix 3.3 – Assessment of Likely Significant Effects Resulting from Removal of Residential Dwellings within the Site Boundary</b> .
Potential temporary effect of the construction workforce on crime levels	Construction	<p>Although residents are often concerned by the potential for crime associated with large construction sites, there is very limited evidence to suggest this occurs in practice. A study by the Metropolitan Police found that only 0.3% of crimes took place on building sites (<b>Ref. 13.3</b>). The Metropolitan Police designing out crime team stated that 80% of these crimes could have been avoided by measures such as:</p> <ul style="list-style-type: none"> <li>Improving access control, correctly identifying who should be on-Site, having measures to challenge at the Site boundary those who do not have authority to be on-Site, reducing access points to a minimum, ensuring the quality of gating and the securing of gates themselves;</li> <li>Improving boundaries and hoardings, which should be of a suitable height and construction to withstand attack and climbing. Where hoardings obscure footpaths or create blind-spots, there should be countermeasures installed to overcome this. Climbing points should be taken into account when constructing the hoarding. Heras fencing in particular is unsuitable as a secure boundary fence.</li> <li>The locking, securing and identification of plant and construction material.</li> </ul>

Element scoped out	Phase	Justification
		All workers will be required to adhere to the Worker Code of Conduct detailed in <b>Appendix 2.3: Outline Construction Environmental Management Plan (OCEMP) (Volume 3)</b> , which details the behavioural standards expected of them, as well as of all workers for contractors throughout the supply chain. The code is enforced to ensure that the entire workforce have no impact on the local community in terms of antisocial behaviour, vandalism, property destruction or other types of social crime.
Potential effect of the operation on crime levels	Operational	Although residents are often concerned by the potential for crime associated with large employment sites or places which attract large volumes of visitors, there is limited evidence to suggest this occurs in practice. Where crime does occur, it is typically crime associated with visitors and large groups of people (such as theft from the person). UDX is experienced in minimising crime at their theme parks across the globe. It is in their interests to minimise crime so as to maximise guest experience. High levels of security will be on Site at the Proposed Development to minimise any crime. Please refer to the <b>Security and Emergency Management Plan (Document Reference 6.4.2.0)</b>
Potential effect on the housing market	Operational	<p>The increase in job opportunities is likely to make the area more attractive in general terms and specifically increase demand for housing linked to the employment supported. This is an indirect effect which would occur through increased migration into the area resulting from it being a more attractive place to live.</p> <p>This may increase house purchase and rental prices in the CSA and SRCA, which would be positive for existing homeowners but negative for existing renters and potential renters and buyers.</p> <p>Should the Proposed Development result in an increase in demand for housing in the area, this would be due to the area being a more attractive place to live which would also be a positive for existing and future residents.</p> <p>The relevant local authorities (Bedford BC, Central Bedfordshire, Luton BC, Milton Keynes City Council, North Northamptonshire and West Northamptonshire) have written to central Government in a public letter confirming their unequivocal support in ensuring the investment is secured for the benefits of residents, visitors and the whole community and to work proactively with UDX to maximise benefits to their local communities. Bedford BC has currently put on hold the preparation of its Local Plan in anticipation of the Proposed Development coming forward.</p> <p>The planning proposal is accompanied by a <b>Planning Statement (Document Reference 6.1.0)</b> which considers compliance with local policy. This confirms that it is the role of the Local Plan process to consider housing and employment growth in the wider area if planning consent is granted for the Proposed Development, and an investment decision made to proceed.</p> <p>Due to significant limitations in the available data and the inherent uncertainties surrounding the potential impact of the Proposed Development on local housing markets, it is judged that it is not possible and beyond the scope of this assessment to accurately predict the level of increased demand for housing that would occur.</p>

Element scoped out	Phase	Justification
Demand for schools	Operational	<p>An increase in residents in a school catchment area would typically lead to an increase in demand for school places. As it is not possible to accurately predict the increased level of housing and associated demand in the CSA and SRCA (as explained above), it is judged to be inappropriate to attempt to evidence the impact of the Proposed Development on the demand for social infrastructure. As explained above, if the development proceeds, then updated local plans would be expected to plan for increased housing requirements, along with the social infrastructure required to support them.</p> <p>It is not possible to assess this effect accurately at the time of the planning proposal, due to the long term nature in which it will arise and the indirect nature of this effect; stemming from various other indirect effects of the Proposed Development. The significance of this effect would depend on the updated local plans' holistic view of demand, which is not known at this stage. However, the letter of support provided by nearby local authorities suggests that they would be supportive of the Proposed Development and this would be reflected in future plans.</p> <p>If planning consent is granted for the Proposed Development, and an investment decision made to proceed, it is expected that the Local Plan process would consider the implications of the project on the future growth of the area, including school capacity needs.</p>
Potential decommissioning of the Theme Park	Post-Operational	<p>After 2051 it is expected that further investment will keep the Theme Park viable and continuously evolving to meet the changing needs of the consumer market and as such there are no plans to decommission.</p>

### 13.3. METHODOLOGY

- 13.3.1. **Chapter 3: Approach to EIA (Volume 1)** outlines the general assessment approach adopted for this ES. A summary of the assessment methodology is provided below.

#### METHOD OF BASELINE DATA COLLECTION

##### BASELINE APPROACH

- 13.3.2. A variety of data sources are used to determine baseline conditions. These range from government sources (ONS, MHCLG, NHS) which have a high degree of confidence, through to industry sources (Construction Industry Training Board, VisitBritain, AECOM theme park index, International Association of Amusement Parks and Attractions) which have medium degree of confidence, and other sources (Local government planning and forecasting documents, news reports, agency publications) which mostly have medium confidence, but some of which are lower confidence. Where baseline information is provided, it is fully referenced. Where some manipulation or interpretation of information is required, this is explained and justified.

##### FUTURE BASELINE APPROACH

- 13.3.3. Information on the future baseline is presented where available, based upon economic, social or community infrastructure plans or projections. This involves relying upon projections from relevant Local Plans, which set out how population, housing, employment and retail expenditure are expected to change in the future. Where these are used, their source and basis is explained. Where



these are not available, the receptor population affected in the future assessment years are assumed to have the same sensitivity as the population in the current baseline.

- 13.3.4. The future baseline also considers when other relevant economic, social or community trends might influence the assessment. For example, the future baseline considers trends in leisure expenditure, investment from other theme parks, growth in conferencing, international and domestic tourism trends and performance of retail. Trends and sources for statements made about the future baseline with respect to these indicators are presented throughout but are inherently uncertain.

## ASSESSMENT METHODOLOGY

- 13.3.5. There is no specific guidance available which establishes a methodology for assessing the socio-economic effects of an Entertainment Resort Complex (ERC). Where possible, impacts have been appraised using relevant national standards. However, for the most part, there exists no industry standard criteria for determining the sensitivity of receptors, the magnitude of impact, or the study area for assessment of socio-economic effects. Therefore, the impact of each effect is assessed on a case-by-case basis, using professional judgement, previous experience and best practice. Where professional judgement is applied it is stated, and a discussion is provided.

## SIGNIFICANCE CRITERIA

### DEFINITIONS OF RECEPTOR SENSITIVITIES

- 13.3.6. From a socio-economic perspective, sensitivity refers to the ability of a receptor to deal with or respond to change.
- 13.3.7. In the context of socio-economics, the level of sensitivity depends upon the baseline conditions (e.g. the extent to which unemployment is an issue in an area and thus how many jobs are needed in that area). This may vary depending upon the study area and year of assessment.
- 13.3.8. The sensitivity of receptors considered in this assessment have been defined as high, medium, low or negligible.
- 13.3.9. Broad definitions of the receptor sensitivities are given below in **Table 13-6**.

**Table 13-6 – Sensitivity criteria**

Sensitivity	Evidence for sensitivity assessment
High	High responsiveness of a receptor to changes in baseline conditions, characterised by low capacity or high scarcity of a socio-economic indicator when compared to targets or compared to other geographies. The receptor is very sensitive to most temporary or permanent changes. For example, if all residents in an area were unemployed and looking for a job, then they would be highly sensitive to a change in the provision of new employment opportunities.
Medium	Moderate responsiveness of a receptor to changes in baseline conditions. For example, if slightly more residents in an area were unemployed and looking for a job compared to comparator geographies, then residents in that area would have a medium sensitivity to a change in the provision of new employment opportunities.
Low	Limited responsiveness of a receptor to changes in baseline conditions. For example, if slightly the same proportion of residents in an area were unemployed and looking for

Sensitivity	Evidence for sensitivity assessment
	a job as in comparator geographies (and such geographies were performing well relative to historic trends), then residents in that area would have a low sensitivity to a change in the provision of new employment opportunities.
Negligible	The study area is performing well and/or does not represent a socio-economic problem for the receptor. For example, if all residents in an area were employed in well paid, good quality jobs then they would not be sensitive to a change in the provision of new employment opportunities.

## MAGNITUDE OF IMPACT

13.3.10. The assessment of magnitude of impact is undertaken based on expert judgment as there are no industry standard criteria. In the context of socio-economics, the magnitude of impact depends upon the change the Proposed Development will have upon the baseline conditions (e.g. the extent to which the Proposed Development will provide employment opportunities in an area and thus how this will change total employment in that area). The classification of magnitude of impact on socio-economic receptors takes account of such factors as:

- The spatial scale at which the effect is assessed;
- The frequency of the effect;
- The degree of change relative to existing environmental conditions;
- The reversibility of the effect; and
- The duration over which the effect occurs.

13.3.11. Magnitude of impacts are classified as high, medium, low, or negligible, provided in **Table 13-7**.

**Table 13-7 – Magnitude of impact**

Magnitude of impact	Description
High	Total loss or major/substantial alteration to key elements/features of the baseline (pre-development) conditions such that the post-development character/composition/attributes will be fundamentally changed.
Medium	Loss or alteration to one or more key elements/features of the baseline conditions such that post-development character/composition/attributes of the baseline will be materially changed.
Low	A minor shift away from baseline conditions. Change arising from the loss or alteration will be discernible/detectable but not material. The underlying character/composition/attributes of the baseline condition will be similar to the pre-development circumstances/situation.
Negligible	Very little change from baseline conditions. Change barely distinguishable, approximating to a 'no change' situation.



## SIGNIFICANCE OF EFFECTS

- 13.3.12. Socio-economic effects reflect the relationship between the sensitivity of the affected receptor and the magnitude of the impact. **Table 13-8** shows how the assessment of the significance of effects has been determined.
- 13.3.13. Effects classified as major, major/moderate, or moderate are significant. Significant effects are highlighted in bold. Effects can be either beneficial or adverse; temporary or permanent; and, direct or indirect.

**Table 13-8 – Significance of effect for Socio-Economics**

Sensitivity of receptor	Magnitude of impact			
	High	Medium	Low	Negligible
High	<b>Major</b>	<b>Major/moderate</b>	Moderate/minor	Minor/negligible
Medium	<b>Major/moderate</b>	<b>Moderate</b>	Minor	Minor/negligible
Low	Moderate/minor	Minor	Minor	Negligible
Negligible	Minor/negligible	Minor/egligible	Negligible	Negligible

- 13.3.14. Embedded mitigation refers to measures built into the project design from the start to prevent or reduce adverse environmental impacts. Additional mitigation involves additional actions taken after the project design is finalised to further reduce or offset impacts not fully addressed by embedded measures. Embedded mitigation is referred to and included in the assessment of effects. If the effect does not require additional mitigation (or none is possible), the residual effect will remain the same. If, however, additional mitigation is required, an assessment of the post mitigation residual effect is provided. Embedded and additional mitigation measures can also represent enhancements of positive effects where actions are taken to improve or amplify the beneficial outcomes of the Proposed Development what would naturally occur.

## ASSESSMENT LIMITATIONS

- 13.3.15. The assessment of the existing environment is naturally limited by the availability of baseline data. Existing baseline economic conditions have been established through interpretation of nationally recognised research, data and survey information. The most recent data published for the given study areas are used throughout this assessment, with a preference for using the most up to date data (2024, 2023, 2022 or 2021) where possible. Where data from these years is not available, the next best alternative has been used (i.e. the most up-to-date).
- 13.3.16. In some cases, it is difficult to get accurate data at small geographical areas. Where appropriate, a proxy for relevant geographies (e.g. the Local Area) is used in order to draw meaningful conclusions. Where this is done, it is clearly stated and explained.
- 13.3.17. For some data, the 2011 Census is the most recent source which, due to its outdated nature, could be considered to have limitations with regards to its representativeness of today's population.

13.3.18. Wherever future baseline information is available (for example projections for growth in employment), this is used to update the position from the current to the estimated future baseline year for a given effect.

13.3.19. Whilst some information gaps have been identified, it is considered that there is sufficient information to enable an informed decision to be taken in relation to the identification and assessment of likely significant environmental impacts on socio-economics.

## 13.4. BASELINE CONDITIONS

### CONSTRUCTION PHASE

#### CONSTRUCTION EMPLOYMENT

##### Baseline

##### Number and proportion of construction workers

13.4.1. The LCA has a working age resident population of 1.6 million as of 2021, with 141,100 working in the construction industry (**Ref. 13.4**). This is 8.8% of the total residential workforce in the LCA, a marginally higher percentage than the national average (8.7%) but lower than other comparator geographies. For instance, 10.5% of the residential population of the CSA work in the construction sector, indicating a high local presence of construction workforce near to the Proposed Development. This high presence is likely to reflect the scale of construction activity that has taken place in these areas (or areas accessible to them) historically, resulting in a larger requirement for a construction workforce, and making the construction sector more attractive to residents.

**Table 13-9 – Working age residents employed in construction, 2021**

Geographical study area	Working age residents employed in construction	Total workforce	% of employed residents in construction
CSA	25,300	242,000	10.5%
SRCA	44,200	484,000	9.1%
LCA	141,100	1.6m	8.8%
RCA	906,000	9.8m	9.3%
England	2.3m	26.4m	8.7%

Source: ONS, 2021. Available at: <https://www.nomisweb.co.uk/>. Accessed May 2025

##### Mobility of construction workers

13.4.2. The construction workforce is known for being highly mobile compared to other industries. In 2022, CITB reported that construction workers in the RCA<sup>2</sup> travelled between 16 and 20 miles on average

<sup>2</sup> The RCA is used as data is unavailable at the LCA level.

to get to work on par with UK construction workers who travelled an average of 17 miles (**Ref. 13.5**). This is larger than the distances travelled by all industry workers in the LCA, RCA, and England and Wales, which were 8.2 miles, 7.9 miles, and 7.1 miles respectively according to the Census (**Ref. 13.4**). This indicates that on average, construction workers travel further than the average worker to work.

**Table 13-10 – Average distance travelled to work by construction workers, 2022**

Region	Average distance travelled to work	Average furthest distance to work in past 12 months	Work in same region as residence
East of England	20 miles	46 miles	71%
East Midlands	18 miles	49 miles	76%
South East	16 miles	43 miles	76%
UK	17 miles	46 miles	85%

Source: CITB, 2023. Workforce Mobility and Skills in the UK Construction Sector 2022. Regional breakdowns are available. Available at: <https://www.citb.co.uk/>. Accessed May 2025

- 13.4.3. It is quite common for construction workers to travel further than the distances shown in **Table 13-10** if they are required to do so for work. Approximately 35% of construction workers in the East travelled at least 50 miles to work in 2022. For the East Midlands the figure was 32%, and 26% in the South East. The UK wide figure was 32%. (**Ref. 13.5**)
- 13.4.4. A major construction project could therefore reasonably draw from a wide construction workforce if necessary.

#### Workforce availability

- 13.4.5. From October 2023 to September 2024, the economic activity rate of working age residents across the LCA was 81%, higher than the SRCA (79%), and the National Area (79%) (**Ref. 13.6**). Additionally, 79% of working age residents in the LCA were employed, higher than all geographies apart from the CSA (81%). The unemployment rate is lower in the CSA (2.7%) compared to other geographies.

**Table 13-11 – Economic activity and employment rate of working age residents across geographies, October 2023 to September 2024**

Geographical study area	Economic activity rate (16 - 64)	Employment Rate (16 - 64)	Unemployment rate (16 - 64)
CSA	83%	81%	2.7%
SRCA	79%	77%	3.4%
LCA	81%	79%	3.4%

Geographical study area	Economic activity rate (16 - 64)	Employment Rate (16 - 64)	Unemployment rate (16 - 64)
RCA	81%	78%	3.6%
National Area	79%	76%	3.9%

Source: ONS, 2025. Annual Population Survey. Available at: <https://www.nomisweb.co.uk/>. Accessed March 2025

- 13.4.6. Across the LCA 17.0% of the economically inactive population are seeking employment. This is in line with the RCA, and close to other comparators (refer to **Table 13-12**).

**Table 13-12 – Proportion of the economically inactive population that want a job across comparator study areas, September 2023 to October 2024**

Area	Number of economically inactive population who want a job	Proportion of economically inactive population who want a job
CSA	7,500	15.6%
SRCA	19,100	15.1%
LCA	54,100	17.0%
RCA	419,000	17.3%
National Area	1.4m	18.5%

Source: ONS, 2025. Annual Population Survey. Available at: <https://www.nomisweb.co.uk/>. Accessed March 2025; Note that four local authorities in the LCA did not have data on the percentage of the economically inactive population who want a job. It has therefore been assumed that these local authorities have the same percentage of economically inactive population who want a job as the National Area, and then the full weighted average for the LCA is calculated.

- 13.4.7. One potential source of construction labour is young people who are not in education, employment, or training (NEET). These individuals have potential to be recruited and will therefore gain disproportionately from any skills training provided over the course of their employment. **Table 13-13** presents the number and concentration of such individuals across the LCA and comparator geographies. The LCA has a far lower percentage of its 16-17 year old population as NEETs than the RCA or National Areas.

**Table 13-13 – NEET statistics by study area, 2023**

Study area	NEETs (aged 16-17)	NEETS (As a proportion of 16-17 year olds)	Of which known to be NEET	Of which activity not known
CSA	350	2.9%	230	120
SRCA	800	3.4%	53	270

Study area	NEETs (aged 16-17)	NEETS (As a proportion of 16-17 year olds)	Of which known to be NEET	Of which activity not known
LCA	1,840	3.0%	1,340	500
RCA	24,400	5.6%	11,700	12,600
National Area	64,900	5.2%	34,800	30,100

Source: Department for Education, 2023. Participation in education, training and NEET age 16 to 17 by local authority. Available at: <https://explore-education-statistics.service.gov.uk/>. Accessed February 2025

### Future baseline

- 13.4.8. The construction industry in the UK has faced a number of challenges in recent times. Rising costs, wavering demand, and an uncertain policy environment have left businesses struggling and placed doubts regarding the long-term growth of the sector.
- 13.4.9. Growth for the construction sector is expected to be modest in 2024, and expected to pick up further from 2025 onwards with opportunities in new housebuilding, infrastructure, and repair and maintenance work (**Ref. 13.7**).
- 13.4.10. Despite these factors, the industry will still require significant inflows of labour to replace those leaving the sector and to facilitate the modest expected growth over the next five years. Accordingly, the CITB estimates that the UK construction industry will need to employ 50,300 people over and above normal recruitment levels between 2024 and 2028 to meet future demand and to replace workers leaving the sector. **Table 13-14** breaks down this requirement by region, displaying the gross number of workers required as well as the percentage of the workforce this represents.

**Table 13-14 – Yearly requirement of construction workers between 2024 and 2028**

Study area	Yearly Requirement (Workers)	Total Construction Jobs (2022)	Yearly Requirement (%)
East of England	3,950	249,000	1.6%
East Midlands	3,500	191,000	1.8%
South East	2,080	380,000	0.5%
RCA	9,530	820,000	1.2%
UK	50,300	2.7m	0.6%

Source: CITB, 2024. CSN Industry Outlook 2024-2028. Available at: <https://www.citb.co.uk/>. Accessed May 2025

- 13.4.11. The RCA yearly requirement of 1.2% is higher than the expected growth of the working-age population between 2024 and 2028, which is expected to average 0.22% a year (**Ref. 13.8**). The construction industry therefore faces a recruitment challenge over and above the level that demographic changes might cause.

13.4.12. The growth in the gross size of the construction workforce is expected to be low, with an average expected annual growth rate of 0.13%. This is lower than the historic growth rate of the total workforce across the RCA, which averaged 0.7% per annum between 2015 and 2023 (**Ref. 13.9**). The gross size of the construction workforce in the RCA is thus expected to remain relatively constant in the near future.

13.4.13. The dual factors of a stable workforce size and high recruitment requirement highlights the high attrition of workers within the industry. This attrition, combined with the relatively modest growth in the number of working age adults in the near future, will pose challenges for the industry going forward.

### Receptor sensitivity

13.4.14. The LCA's prevalence of construction workforce is very similar to the national average and mobility of the construction workforce is very similar to the national average. Unemployment rates are slightly lower than national rates and the rate of economically inactive residents looking for work is slightly lower but more or less in line with the national average. The future baseline identifies potential challenges in recruiting construction workforce in future years. **Residents of the LCA are judged to have a medium sensitivity to construction employment impacts.**

## CONSTRUCTION SKILLS FOR LOCAL PEOPLE

### Baseline

#### Resident qualifications

13.4.15. Residents of the CSA on average perform in line with national rates when it comes to qualifications. The largest divergence from what is recorded nationally in the CSA is that a slightly lower proportion of residents from the CSA (16%) achieve no qualifications compared to 18% nationally.

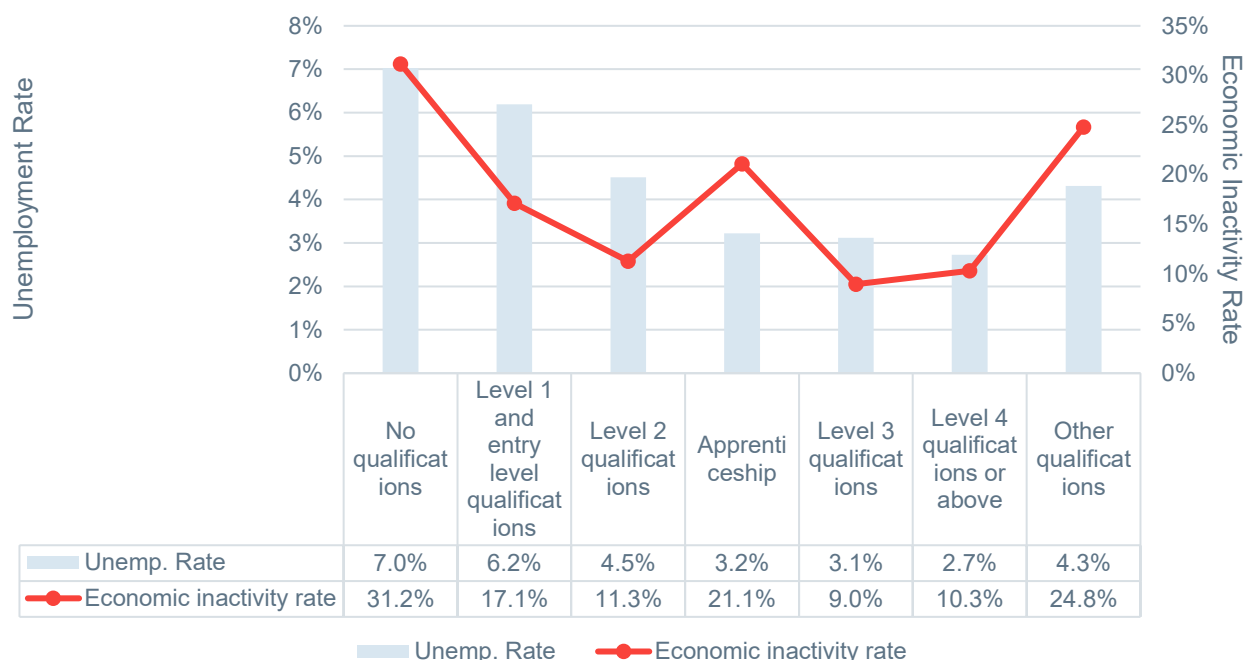
**Table 13-15 – Highest level of qualification achieved across geographies (2021)**

Study area	No qualifications	Level 1 and entry level	Level 2	Apprenticeship	Level 3	Level 4 qualification	Apprenticeship	Other qualifications
CSA	16%	10%	14%	5.8%	17%	34%	5.8%	2.6%
SRCA	17%	11%	14%	5.3%	16%	34%	5.3%	3.0%
LCA	16%	10%	13%	5.1%	16%	36%	5.1%	2.8%
RCA	17%	10%	14%	5.4%	17%	33%	5.4%	2.8%
National	18%	10%	13%	5.3%	17%	34%	5.3%	2.8%

Source: ONS, 2021. Census 2021 TS067 – Highest level of qualification. Available at: <https://www.nomisweb.co.uk/>. Accessed May 2025

13.4.16. Residents with no qualifications have both a high unemployment rate and a high economic inactivity rate. This is evident in the CSA where people with no qualifications have an employment rate of

7.0% compared to the average of 3.7%, and an economic inactivity rate of 31.2% compared to the average of 23.7% (Ref. 13.6). Refer to **Figure 13.2**.



**Figure 13.2: Unemployment rate and economic inactivity rate by highest qualifications achieved, CSA**

#### Construction qualifications

13.4.17. **Table 13-16** displays the proportion of workers who have achieved each qualification in the construction industry as well as across all industries in the CSA and comparators. In general, workers in the construction industry have achieved the highest qualification levels at a lower rate than the average for all industries. This is partially balanced by an increased prevalence of apprentice-based and other forms of qualification. The distribution of qualifications for the CSA, the RCA and National Areas are all broadly aligned with no notable differences.

**Table 13-16 – Highest level of qualification for construction workers compared to remainder of the population across study areas, 2021**

Qualification	CSA		RCA		National Area	
	All industries	Construction	All industries	Construction	All industries	Construction
All categories: Highest level of qualification	100%	100%	100%	100%	100%	100%
No qualifications	15.7%	10.4%	17.2%	11.6%	18.2%	12.1%

Qualification	CSA		RCA		National Area	
	All industries	Construction	All industries	Construction	All industries	Construction
Level 1 qualifications	10.4%	11.4%	10.2%	11.4%	9.6%	10.4%
Level 2 qualifications	14.3%	15.2%	14.0%	15.3%	13.4%	14.3%
Level 3 qualifications	17.4%	23.7%	17.4%	23.7%	16.9%	23.5%
Level 4 qualifications and above	33.8%	24.7%	32.9%	23.1%	33.8%	24.5%
Apprenticeships and other qualifications	8.4%	14.7%	8.2%	14.9%	8.1%	15.2%

Source: ONS, 2021. Census 2021 : Upper tier local authorities, Highest level of qualification (7 categories) and Industry (current) (9 categories)

### Construction worker incomes

- 13.4.18. Construction income data is not available at the local authority district geographical level. For this reason, the average wages of construction workers in the CSA are estimated by finding the differential between construction and average wages at the National Area, then applying this multiplier to the average wages at the local authority district level. Average wages at the local authority district level can be estimated for workers who live in the district, or who work in the district. These two approaches provide different estimates and so both are used throughout this section.
- 13.4.19. The results of this process are shown in **Table 13-17**. It is estimated that construction workers earn an above average wage in both estimation methods, with their wage ranging from £38,400 to £44,800.

**Table 13-17 – CSA average wages, 2023**

Industry	Average Wage (Resident Based)	Average Wage (Workplace Based)
Construction	£44,800	£38,400
All workers	£41,200	£35,300

Source: Annual Survey of Hours and Earnings, 2024. Business Register and Employment Survey, 2024. ONS,2025. EARN03: Average Weekly Earnings by Industry



### Construction apprenticeship achievements

13.4.20. Relative to comparator study areas the CSA delivers a significant proportion of construction apprenticeships. Construction apprenticeships made up 24.6% of all apprenticeships across the CSA in 2021/22, comparing to 9.8% of apprenticeships across the RCA and 8.0% of apprenticeships across the National Area. The significant provision of construction apprenticeships is particularly clear in the context of per 100,000 of the population, whereby across the CSA there are 57.3 construction apprenticeships per 100,000 population, compared to 22.2 across the RCA and 20.6 across the National Area (refer to **Table 13-18**).

**Table 13-18 – Provision of construction apprenticeships 2021/22 academic year**

Study Area	Construction apprenticeships	% of total apprenticeships	Construction apprenticeships per 100,000 population	Construction apprenticeships per 100,000 construction workers
CSA	280	24.6%	57.3	1,105
RCA	4,600	9.8%	22.2	508
National Area	11,800	8.0%	20.6	515

Source: DfE, 2024. Explore education statistics

### **Future baseline**

13.4.21. UK construction output rose by 2% in 2023, the third consecutive year of growth. From 2024 to 2028 output is expected to rise by an average of 2.4% a year, with little or no growth in 2024. An increase in output will require an increase in workforce.

13.4.22. CITB find that professional occupations have been rising as a proportion of the construction workforce and are likely to keep rising across the near future. These occupations, which include roles such as architects and civil engineers, are likely to require Level 4 qualifications or above, and so the distribution is likely to shift over time. CITB further find that there is expected to be a stronger requirement for skilled trades and operatives (**Ref. 13.7**).

### **Receptor sensitivity**

13.4.23. The CSA residents have qualification levels across all industries and construction specifically which are in line with national levels. However, the qualifications of construction workers are generally lower than the average across all industries, and this is set in the context of a sector with rising requirements for higher skilled roles. The CSA performs noticeably well on apprenticeships in construction, and workers in construction earn more than the average. **Residents of the CSA are judged to have a medium sensitivity to construction skills impacts.**

## TEMPORARY EFFECT ON ACCOMMODATION

### Baseline

#### Service and non-serviced accommodation

- 13.4.24. **Table 13-19** displays the number and price of available bedrooms in the CSA, the SRCA, and the LCA, split between serviced and non-serviced accommodation.
- 13.4.25. In 2024, the average occupancy rates for serviced accommodation in England stood at 79%, with peak occupancy reaching 85% in July 2024. The occupancy for July 2024 varied from 73% up to 88% across the different regions (**Ref. 13.10**). The figures for the RCA are stated below (**Ref. 13.11**). Combined, they broadly fall in line with the national average:
- East of England: 83%
  - East Midlands: 83%
  - South East: 86%
- 13.4.26. The majority of serviced accommodation bedrooms are in hotels. There are considerably fewer hotel bedrooms in the CSA than the SRCA. Within the CSA, there are approximately 87 hotels with a total of approximately 2,840 serviced bedrooms (**Ref. 13.12, 13.90**). CoStar finds that the average occupancy for rooms in the CSA in February 2025 year to date was 66.7%, peaking at 81.1% in July 2024 (**Ref. 13.90**). Assuming the peak vacancy as a cautious worst case, it is assumed that at any point in time approximately 535 hotel bedrooms are available across the CSA.
- 13.4.27. Similarly, there are 257 hotels located within the SRCA with a total of approximately 9,225 serviced bedrooms. CoStar finds that the average occupancy for rooms in the SRCA in February 2025 year to date was 69.7%, peaking at 82.2% in July 2024. Assuming the peak vacancy as a cautious worst case, it is assumed that at any point in time approximately 1,640 hotel bedrooms are available across the CSA (**Ref. 13.90**). In the CSA, serviced bedrooms cost £73 a night on average, with £68 in the SRCA (**Ref. 13.90**).
- 13.4.28. Non-serviced accommodation, typically comprising holiday lets, self-catering units, and short-term rentals, is far less prevalent across all geographies. Non-serviced stock remains limited and is more commonly used in rural or leisure-driven destinations. In the CSA, only 40 non-serviced bedrooms are recorded, with 30 likely to be available during peak occupancy (**Ref 13.12**). In the SRCA, 570 non-serviced bedrooms are recorded, with 390 estimated to be available at peak. These figures reflect the more limited and sporadic nature of non-serviced accommodation in the area. Additionally, non-serviced rooms tend to be more expensive, with average nightly rates of £138 in the CSA and £141 in the SRCA. Nationally, non-serviced accommodation recorded an average occupancy rate of just 32% in 2022, highlighting its limited role in meeting general visitor accommodation demand (**Ref. 13.13**).

**Table 13-19 – Estimated available accommodation stock by numbers of bedrooms**

Qualification	Serviced			Non-serviced		
	Total stock of bedrooms	Number of bedrooms available at peak occupancy	Average cost per bedroom	Total stock of bedrooms	Number of bedrooms available at peak occupancy	Average cost per bedroom
CSA	2,840	535	£73	40	30	£138
SRCA	9,225	1,640	£68	570	390	£141

Source: CoStar, 2025. CoStar Analysis. VisitBritain, 2016. England Accommodation stock audit. Sykes, 2023. Holiday Let Occupancy Rates.

#### Private rented sector

13.4.29. The PRS category covers the provision of accommodation in self-contained spaces that are made available through private landlords. The vacancy rate for PRS dwellings in 2023, less the flow rate (a measure of the number of houses needed to facilitate the smooth running of the housing market), was 9.6%, indicating spare capacity (**Ref. 13.14**). The CSA contains 32,495 PRS properties, of which 3,130 properties are available at any given time (**Ref. 13.15**).<sup>3</sup> The number of available properties rises from 3,130 (in the CSA) to 7,425 in the SRCA and 27,165 in the LCA (refer to **Table 13-20**).

**Table 13-20 – Available PRS dwellings and bedrooms by study area**

PRS availability	CSA	SRCA	LCA
Dwellings	3,130	7,425	27,165
Rooms	8,075	19,120	70,840

Source: ONS, 2023. Subnational estimates of dwellings by tenure, England. ONS, 2021. Census 2021: TS019 – Migrant Indicator.

13.4.30. **Table 13-21** outlines the rental values, as of September 2023, associated with PRS properties within each study area for all property sizes. Rental values for most property sizes except ‘studio’ and ‘One Bed’ properties are more expensive across the CSA than is recorded across the RCA and National Area, but cheaper than the SRCA.

<sup>3</sup> Available dwellings are the product of the total number of dwellings and the net vacancy rate for PRS properties. The number of available rooms has been calculated using the average household bedroom size associated with each Local Authority District considered within each geography: ONS, 2021. TS050 - Number of bedrooms

**Table 13-21 – Rental values per month by property size across study areas, 2022/23**

Study Area	All properties	Room	Studio	One bed	Two bed	Three bed	Four or more bed
CSA	£900	£590	£580	£730	£890	£1,150	£1,580
SRCA	£940	£590	£630	£770	£950	£1,210	£1,590
RCA	£890	£520	£610	£730	£880	£1,070	£1,510
National Area	£850	£500	£670	£750	£830	£930	£1,550

Source: ONS, 2023. Private rental market summary statistics in England

13.4.31. **Table 13-22** compares the rental values in the CSA to other geographies, and **Table 13-23** does the same for rental values of the SRCA. Notably, the rental value for three-bed properties in the CSA are 24% higher than the national rate, and the figure for the SRCA is 30%. Additionally, rental values for ‘room’ properties are 18% more expensive than the national rate at both the CSA and SRCA level. However, rental values for ‘studio’ properties are 13% lower than the national rate for the CSA, and 6% lower than the national rate for the SRCA.

**Table 13-22 – Percentage difference in CSA rental values by property size compared to comparators (2022/2023)**

Study Area	All properties	Room	Studio	One bed	Two bed	Three bed	Four or more bed
SRCA	-4%	0%	-8%	-5%	-6%	-5%	-1%
RCA	1%	13%	-5%	0%	1%	7%	5%
National Area	6%	18%	-13%	-3%	7%	24%	2%

Source: ONS, 2023. Private rental market summary statistics in England

**Table 13-23 – Percentage difference in SRCA rental values by property size compared to comparators (2022/2023)**

Study Area	All properties	Room	Studio	One bed	Two bed	Three bed	Four or more bed
CSA	4%	0%	9%	5%	7%	5%	1%
RCA	6%	13%	3%	5%	8%	13%	5%
National Area	11%	18%	-6%	3%	14%	30%	3%

Source: ONS, 2023. Private rental market summary statistics in England

## Future baseline

- 13.4.32. In recent years, a combination of coronavirus pandemic related factors and inflationary pressures have squeezed real incomes and placed pressure on household's budgets. As such, leisure industries have faced strains as household spending moves from luxuries to necessities. According to GfK's long running Consumer Confidence Index, consumer confidence in the UK began to recover in 2023, and while this trend slowed in 2024, the index shows a higher consumer confidence in March 2025 than March 2024 (**Ref. 13.16**).
- 13.4.33. This tentative recovery is particularly strong in the leisure travel industry, which performed well in 2024 as consumers prioritise travel and the experiential over other leisure goods. Indeed, the number of leisure trips globally in 2024 is expected to pass the 2019 level, with spending 24% higher than that year. (**Ref. 13.17**).
- 13.4.34. Compounding the recovery of trips in the sector is the strong RevPAR (Revenue per Available Room) performance across hotels in the UK, which were 24.1% higher in May 2023 than they were in May 2019 (**Ref. 13.18**). These figures represent a substantial boost to the revenues of the sector, indicating a strong level of domestic demand. However, it is important to consider that high inflation rates during these years have contributed to this increase in revenue.
- 13.4.35. There is a relatively low stock of hotel bedrooms currently in the CSA and the outlook for the sector is positive. Specifically, recent trends suggest that hotels across the UK have recovered well from the pandemic and are in a strong position going forward. There is not sufficient information to translate these trends into a quantitative forecast for increased hotel provision in the future baseline but, given these trends, it is concluded that hotel provision in the Study Areas is unlikely to significantly decrease. For this reason, the assessment is made against the current baseline of hotel stock, which is a conservative approach as it may realistically grow which would create more available stock in the future.
- 13.4.36. Regarding future PRS properties, historic population growth compared with historic accommodation stock growth between 2012 and 2021 shows that PRS housing stock at all geographies grew at a faster rate (**Ref, 13.6, 13.19, 13.20**). This implies that the future available PRS stock is also likely to increase at a faster rate, resulting in more available properties. In the CSA, the PRS stock grew by 23% compared to population which saw a 15% increase. At the SRCA geography, PRS stock grew by 18% while population grew by 13%. Although the growth in PRS stock and population was somewhat lower at 18% and 10% respectively in the LCA, the disparity between PRS stock growth and population growth has been widening more rapidly. This suggests that future available PRS stock is likely to increase at a faster rate than other geographies. However, it is important to bear in mind the labour availability challenges discussed in Paragraph **13.4.11** which may have implications on the ability of all areas across the RCA to meet the level of homes demanded going forward as set out in the NPPF to respond to the national housing crisis (**Ref 13.21**). As trends suggest that the stock and availability of PRS could increase in the future, the future baseline is not likely to get more sensitive than the current baseline.

## Receptor sensitivity

- 13.4.37. **Businesses (specifically hotel stock) of the CSA are judged to have a high sensitivity to temporary accommodation demand impacts.** This is due to the fact there are relatively low levels of stock with lower prices than comparator geographies and, with strong future baseline trends for demand in the sector, it is possible that availability and affordability will heighten. **Businesses**

(specifically hotel stock) of the SRCA are judged to have a medium sensitivity to temporary accommodation demand impacts on the basis that there are higher levels of stock in the SRCA than the CSA, but the future baseline trends are similar.

- 13.4.38. There is a high level of PRS stock in the CSA and it has historically grown at a faster rate compared to population. However, to be conservative given the context of a national housing crisis and the relatively higher rental values compared to National Areas, **residents of the CSA and SRCA are judged to have a medium sensitivity to temporary accommodation demand impacts.**

## DISRUPTION TO LOCAL BUSINESS

- 13.4.39. There are several businesses located within the Local Area (but outside the Site). In some instances where potentially sensitive assets have been identified or there are properties just outside the 500m radius, they are included in order to make sure the assessment is both fair and thorough. **Table 13-24** details these businesses. There are no formal guidelines for assessing sensitivity of each business to disruption, and so professional judgment is used. Justification and explanation for the conclusions reached is provided.

**Table 13-24 – Businesses in the Local Area of the Site**

Area	Description	Receptor sensitivity
Kempston Hardwick	<p><b>Industrial and logistics</b></p> <p>Specialist Power Systems, Manor Road – immediately east of the Site.</p> <p>Paul Riches Skips, Manor Road – immediately east of the Site.</p> <p>G.Moore Haulage, Manor Road – immediately east of the Site.</p> <p>Gemmix, Manor Road – immediately east of the Site.</p> <p>CEMEX Bedford Concrete Plant, Manor Road – immediately east of the Site.</p> <p>Pristine Clean Solutions – 250m east of the Site.</p> <p><b>Retail</b></p> <p>The Marquee, Manor Road – immediately east of the Site.</p> <p>AVG Windscreens, Manor Road – immediately east of the Site.</p> <p>Carszo, B530 Ampthill Road – immediately east of the Site.</p> <p>Major Cars, B530 Ampthill Road – immediately east of the Site.</p> <p>British Car Auctions, Kiln Road – immediately east of the Site.</p>	<p><b>Industrial and logistics: High</b> – the majority of businesses in Kempston Hardwick are centred in logistics and manufacturing. Such businesses have a high reliance upon good access. Therefore, they are likely to be very sensitive to changes in traffic or access which would directly impact their business operations.</p> <p><b>Retail: High</b> – some of the retail establishments located within the hamlet of Kempston Hardwick are the types of businesses which serve their local communities. They are likely to serve local clientele who are therefore potentially accessing on foot as well as some customers accessing via vehicles. These businesses will also rely on vehicle access for their suppliers. Furthermore, there are car based businesses that would presumably require vehicle access for customers. For these reasons, it is conservatively judged that retail businesses have a high sensitivity to disruption.</p>



Area	Description	Receptor sensitivity
	<p>Japanese Car Breakers, B530 Ampthill Road – immediately east of the Site.</p> <p>Glory and Fire Ministries International, B530 Ampthill Road – 50m south of the Site.</p> <p>KK Lashes – 250m east of the Site</p> <p>CR Beauty and Makeup – 250m east of the Site</p> <p>A Quiet Place for Reflexology – 300m east of the Site</p> <p>Happier Days for Dogs – 300m east of the Site</p>	
Wootton	<p><b>Industrial and logistics</b></p> <p>D&amp;G Noble, Woburn Road – 105m east of the Site.</p> <p>Bedford Commercial Park, Fields Road – immediately west of the Site. There are approximately 11 warehouses, including: Amazon, Expeditors International, Red Occasions, Ingredient Batching Systems, Stone Cookers, eControl System, Visual Displays Limited, 360 Graffix, Exa-flo, EpciTech Media and Bromoco International. These businesses are immediately adjacent to the Site and up to 200m west of the Site.</p> <p><b>Retail</b></p> <p>Sainsbury's Local, Folkes Road – 305m west of the Site.</p> <p>Dave's Snax, Woburn Road – adjacent to site boundary</p>	<p><b>Industrial and logistics: High</b> – D&amp;G Noble is a haulage contractor located nearby the Site. The business is reliant on the road network in the Local Area being accessible and efficient. Any disruption to this network could significantly impact business operations. Bedford Commercial park is an industrial and logistics space which is similarly expected to be highly sensitive to any traffic and noise disruption.</p> <p><b>Retail: Medium</b> – The Sainsburys local located on Folkes Road is small in scale and does not have car parking facilities. It is intended to serve the community of Wootton and will be predominantly accessed by foot. It is therefore less susceptible to traffic disruption.</p> <p>Dave's Snax is a food truck on Woburn Road, reliant on traffic and accessibility. It is intended to serve the local community and people passing the area.</p>
Stewartby	<p><b>Business parks and offices</b></p> <p>The Bedford Group of Drainage Boards, Broadmead Road – 325m south of the Site.</p> <p>Stewartby Business Park is located on Broadmead Road, 325m south of the Site. There are approximately eight units on the site, designed for warehouse, light manufacturing and office use. It currently host five businesses, including two electric vehicle charging point companies, an education centre, a furniture</p>	<p><b>Business parks: High</b> – Stewartby Business Park is predominantly characterised by warehousing and industrial operations, although there is a small office presence at. Similarly, the Bedford Group of Drainage Boards hosts office-based functions. For these office users, maintaining a quiet working environment is important, particularly during standard working hours. Any disruption from increased</p>

Area	Description	Receptor sensitivity
	<p>shop and a warehouse. These businesses are located between 335m-500m south of the Site.</p> <p><b>Retail/F&amp;B</b></p> <p>The Bronzing Shop, Clay Avenue – 475m south of the Site.</p> <p>Dominos, Clay Avenue – 475m south of the Site.</p> <p>Coop, Clay Avenue – 480m south of the Site.</p>	<p>traffic or construction-related noise could adversely affect day-to-day business operations. These factors contribute to a high sensitivity to disruption for both locations.</p> <p><b>Retail/F&amp;B: Medium</b> – Local shops and F&amp;B outlets are intended to serve the local residential community. These locations are predominantly accessed by foot, however F&amp;B outlets will be more reliant on the road network for delivery services.</p>
Wixams	<p><b>Industrial and logistics</b></p> <p>B&amp;M Distribution Centre – 400m east of Site</p> <p>Major Cars – 100m east of Site</p> <p>AR Cars Limited – 100m east of Site</p> <p>Tarmac Elstow Concrete Plant – 250m east of Site</p> <p>Ibstock Concrete, B530 Ampthill Road – immediately east of the Site.</p>	<p><b>Industrial and logistics: High</b> – B&amp;M Distribution Centre and Tarmac Elstow Concrete Plant are heavily reliant on access to the local road network for business operations and therefore have a high sensitivity to traffic disruption. Although Major Cars is a car dealership its business operations are still heavily reliant on the road network.</p>
Kempston	<p><b>Marsh Leys Business Park including:</b></p> <p><b>Industrial and logistics</b></p> <p>Asda Chilled Distribution Centre, Woburn Road – 65m west of the Site;</p> <p>Sainsburys Tu Distribution Centre, Woburn Road – 75m west of the Site;</p> <p>Argos Distribution Centre, Woburn Road – 305m west of the Site;</p> <p>DHL Warehouse, Woburn Road – 305m west of the Site; <b>and</b></p> <p>Sapphire Vehicle Services, Woburn Road – 500m west of Site.</p> <p>DHL Warehouse, Woburn Road – 305m west of the Site.</p>	<p><b>Industrial and logistics: High</b> – The majority of businesses in Kempston are centred in logistics and manufacturing and heavily reliant on the local road network. As such, they are highly sensitive to disruption from a change in traffic.</p>
Bedford	<p><b>Retail</b></p> <p>Interchange Retail Park is located off the B530 Ampthill Road, north of the Site. There are approximately five retailers including Next, TK Maxx, Home Bargains, McDonalds, Boots, Sports Direct. These businesses are located between 320m and 480m north of the Site.</p>	<p><b>Retail: High</b> – Interchange Retail Park is located to the north of the Site. It is assumed that the majority of customers to the retail park originate from Bedford and rely on the local road network for access, supported by the provision of large-scale car parking. Any disruption to road access,</p>



Area	Description	Receptor sensitivity
	<p><b>Mixed use</b></p> <p>Woburn Road Industrial Estate is located along Wolseley Road, north and northwest of the Site. There are approximately 129 businesses of sectors including (Ref: industrial, manufacturing, warehouse, hardware stores, car repair garages, fitness studios, car dealerships, engineering consultants, plumbers' merchants, various suppliers, an accounting firm, and a dental laboratory. These businesses are located between 160m-500m north and northwest of the Site.</p>	<p>particularly during peak retail hours, could negatively impact footfall and trading performance. Given the reliance on convenient vehicular access for customer and delivery movements, the retail park is assessed as having high sensitivity to disruption.</p> <p><b>Mixed use: High</b> – Woburn Road Industrial Estate is a substantial mixed-use complex comprising a variety of business premises, including warehousing, light industrial units, and office spaces. As with the above assessments, access will be important to the ongoing activities of these businesses, particularly for logistics and employee commuting. In addition, the presence of office-based functions means that a relatively quiet working environment is important during standard business hours. Prolonged or unpredictable noise could disrupt these operations. Taking both access and noise factors into account, the estate is assessed as having high sensitivity to disruption.</p>

### Future baseline

13.4.40. It is difficult to project the future development of local private property, businesses, and community assets. Given there is no known development of business uses within the Local Area, it is assumed that the current baseline reflects the most appropriate and likely position of the future baseline as well.

### Receptor sensitivity

13.4.41. **Businesses in the Local Area are deemed to be of high sensitivity to disruption**, as vehicular access forms a key requirement for the effective functioning of their activities. This sensitivity varies by business type: logistics and industrial businesses rely heavily on vehicle access for the movement of goods, suppliers, and customers, whereas some retail businesses may depend more on footfall. However, the presence of car-related retail businesses and other uses that are dependent on vehicle access reinforces the overall vulnerability to access disruption. Additionally, a number of businesses in the area include office-based functions, for whom a relatively quiet working environment is necessary during standard business hours. Prolonged or unpredictable noise could impact productivity and business continuity. Taking all these factors into account, and adopting a conservative approach, businesses in the Local Area are assessed as having high sensitivity to disruption.

## EMERGENCY SERVICES

### Baseline

### Emergency health services

13.4.42. According to the most recently available data (**Ref. 13.81**), accident and emergency performance across Bedfordshire has followed national trends. Bedfordshire Hospitals NHS Foundation Trust (incorporating Bedford Hospital and Luton & Dunstable University Hospital, and as such is representative of the CSA and SRCA) saw 72.6% of accident and emergency patients within 4 hours, compared to a national rate of 73.4%.

### Fire services

13.4.43. Bedfordshire Fire and Rescue Services is comprised of 14 fire stations across Bedfordshire<sup>4</sup>, with the area experiencing 2.1 fire incidents per 1000 population, less than the 2.4 national average. Across all fire incident types (e.g. dwellings, road vehicles, outdoors etc), response times to fires in Bedfordshire have been comparable with national response times; the average incident response time in 2024 was 9 minutes and 7 seconds in Bedfordshire, only slightly higher than the 9 minutes and 4 seconds national response time (**Ref 13.95**).

### Police services

13.4.44. The SRCA faces a number of challenges with regard to policing. As shown in **Table 13-25**, both police forces that cover the SRCA have a lower number of officers relative to the population they cover than the national average. Whilst this challenge is present across the whole region, it does indicate a relative under-provision. Likewise, Bedfordshire Police Force, which covers three of the four local authorities that make up the SRCA, has a notably lower proportion of officers in front line roles than the regional and national averages. This low proportion could, therefore, act to exacerbate the impacts of an already low provision of officers.

**Table 13-25 – Provision of officers and proportion of officers in front line roles by LAD and police force, 2024**

Study area	Police force	Officers per 250,000 population	Proportion of officers in front line roles
Bedford	Bedfordshire Police	204	80.5%
Central Bedfordshire	Bedfordshire Police	204	80.5%
Luton	Bedfordshire Police	204	80.5%
Milton Keynes	Thames Valley Police	198	88.1%
East of England	Multiple	198	90.5%
England	Multiple	245	90.5%

<sup>4</sup> This area comprised of Bedford, Central Bedfordshire and parts of Luton and Milton Keynes. It is used to reflect the SRCA as it is the closest available in geography.

Source: Home Office, 2024. Police Workforce, England and Wales: 31 March 2024. Available at: <https://www.gov.uk/government/statistics/>. Accessed February 2025

- 13.4.45. Bedfordshire Police Force also faces challenges in terms of outcomes. Less than eight percent of victim-based crimes were brought to justice in the year ending 31 March 2023, a figure that places it in the bottom 10% of all police forces in England. Thames Valley Police, meanwhile, performs relatively better in this regard, placing 23<sup>rd</sup> out of 43 (**Ref. 13.23**).
- 13.4.46. The yearly performance review by His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) is positive for Bedfordshire Police Force, which receives a ranking of 'Good' or above for six out of nine categories, and 'Requires improvement' or below for just two categories. Thames Valley Police Force, meanwhile, performs relatively poorly with just one 'Good' ranking and five rankings of 'Requires improvement' or below (**Ref. 13.24**).
- 13.4.47. Altogether the picture is mixed. Both police forces in the SRCA face issues with staffing, having relatively fewer police officers per 250,000 population than the national average. Bedfordshire Police Force scores relatively better in some qualitative metrics but faces worse outcomes than Thames Valley Police.

#### Future baseline

- 13.4.48. Projections for public service provision and performance are unavailable. The demand for such services is linked to the level of population and (to a lesser extent) employment in the areas they serve, both of which are forecast to grow in the future across all study areas (refer to **Table 13-40** and **Table 13-43**). It is the responsibility of public service providers and local planning authorities to plan for such growth. Developments across the CSA and SRCA are generally expected to mitigate their effects on local infrastructure, for example through the provision of services or contributions secured via the planning system. However, during engagement with health bodies, concerns were raised that such mitigation is not always delivered in practice, and that new residential developments are placing increasing pressure on existing health provision.

#### Receptor sensitivity

- 13.4.49. **Service providers in the CSA and SRCA are judged to have a medium sensitivity to changes in demand for local emergency services.** Both the CSA and SRCA have reported issues with regards to the performance and staffing of the police force. Fire accidents occur at a lower rate than the National Area, but the response time is marginally higher in the CSA and SRCA. The response time for ambulances is in line with the national rate.

## OPERATIONAL PHASE

### TRADE CREATION

#### Baseline

- 13.4.50. The AECOM Theme Index is an annual publication providing attendance numbers for a wide variety of theme parks and other global attractions (**Ref. 13.25**). It contains data for amusement/theme park operators worldwide, including UDX. The AECOM Theme Index is a widely accepted benchmark of performance across the industry. It disaggregates annual attendance at theme parks, depending on their geographical locations.

13.4.51. The following two sections report the relevant information from this for global and UK provision. This demonstrates that the UK does not have a global/top 25 theme park, but it does have several in the second category which is the Europe, the Middle East and Africa (EMEA) top 20. Merlin Entertainments (Merlin) operates all such theme parks in the UK market.

13.4.52. The attendance at these parks is reported and discussed here and is also compared against some smaller relevant UK theme parks or leisure destinations. The AECOM Theme Index does not report attendance for any UK theme parks other than those operated by Merlin and so the sources for attendance are different and are stated where relevant.

#### Global theme park provision

13.4.53. **Table 13-26** compares the attendee numbers of the top 25 global amusement/theme parks by visitor numbers according to AECOM in 2023 (**Ref. 13.25**). Where available, 2019 attendance and rankings have been collated from previous iterations of the theme park index to assess how close 2023 figures are to a full recovery from the coronavirus pandemic. Across those parks where attendance figures are available for 2019 and 2023, total attendance in 2023 fell short of the 2019 level by only 4.5%, compared to 16.4% in 2022. Total attendance numbers in 2023 reached 226.1 million, compared to 198.0 million in 2022, an increase of 14.2%. Five of the top 25 global theme parks are Universal parks, all of which tend to follow the average recovery trend, with Universal Studios Japan performing the best, showing attendance figures of 16.0 million in 2023, 10.3% higher than 2019. Universal Beijing Resort only opened in 2021 (during the pandemic) so its inclusion in the top 25 by 2023 highlights UDX's ability to create new global destinations.

**Table 13-26 – Attendance at the top 25 global theme parks in 2019, 2022 and 2023**

Theme park	2019 attendance	2022 attendance	2023 attendance	2019 – 2023 % change	2022 – 2023 % changes
Magic Kingdom Theme Park At Walt Disney World Resort, Florida - US	21.0m	17.1m	17.7m	-15%	3%
Disneyland Park, Anaheim - US	18.7m	16.9m	17.3m	-8%	2%
Universal Studios Osaka - Japan	14.5m	12.4m	16.0m	10%	30%
Disneyland Tokyo - Japan	17.9m	12.0m	15.1m	-16%	26%
Shanghai Disneyland - China	11.2m	5.3m	14.0m	25%	164%
Chimelong Ocean Kingdom - China	11.7m	4.4m	12.5m	7%	185%
Tokyo DisneySea - Japan	14.7m	10.1m	12.4m	-15%	23%

Theme park	2019 attendance	2022 attendance	2023 attendance	2019 – 2023 % change	2022 – 2023 % changes
Epcot at Walt Disney World - US	12.4m	10.0m	12.0m	-4%	20%
Disneyland Park at Disneyland Paris - France	9.7m	9.9m	10.4m	7%	5%
Disney Hollywood Studios - US	11.5m	10.9m	10.3m	-10%	-6%
Universal Islands of Adventure at Universal Orlando - US	10.4m	11.0m	10.0m	-4%	-9%
Disney California Adventure Park - US	9.9m	9.0m	10.0m	1%	11%
Universal Studios Florida at Universal Orlando - US	10.9m	10.8m	9.8m	-11%	-9%
Universal Studios Hollywood, Universal City - US	9.1m	8.4m	9.7m	6%	15%
Universal Studios Beijing - China	N/A	4.3m	9.0m	N/A	109%
Disney Animal Kingdom at Walt Disney World, Florida - US	13.9m	9.0m	8.8m	-37%	-3%
Hong Kong Disneyland - Hong Kong	5.7m	3.4m	6.4m	12%	88%
Europa-Park, Rust - Germany	5.8m	5.4m	6.0m	4%	11%
Everland, Gyeonggi-Do, South Korea	6.6m	5.8m	5.9m	-11%	2%
Walt Disney Studios Park at Disneyland Paris, France	5.2m	5.3m	5.7m	9%	7%
Chimelong Paradise, Guangzhou - China	4.9m	2.3m	5.6m	14%	143%

Theme park	2019 attendance	2022 attendance	2023 attendance	2019 – 2023 % change	2022 – 2023 % changes
De Efteling, Kaatsheuvel - Netherlands	5.3m	5.4m	5.6m	6%	2%
Lotte World, Seoul - South Korea	6.0m	4.5m	5.2m	-13%	15%
Zigong Fantawild Dino Kingdom, Zigong - China	N/A	1.7m	4.9m	N/A	178%
Mianyang Fantawild Oriental Heritage, Mianyang - China	N/A	2.6m	4.6m	N/A	77%

Source: AECOM, 2024. Theme Index 2023. Available at: <https://aecom.com/theme-index/>. Accessed May 2025

- 13.4.54. **Table 13-27** provides a summary of the countries the top 25 global theme parks are found in. A comparison of provision in proportion to the residential population (all ages) can give an idea of provision for each country. It can be seen that Hong Kong has the highest rate of provision at 0.135, and China has the lowest at 0.004. The US, Japan, and France all have between 0.02 and 0.03 per million population.
- 13.4.55. A country's global park provision can also be compared to tourism international arrivals in the country to give an idea of the ability of the country to serve its tourist population within the parks. It can be seen that South Korea has the highest rate of provision at 0.181 parks per million tourist international arrivals, followed closely by Japan at 0.119. France has the lowest at 0.020. In reality, theme parks attract visitors from a variety of markets, and the penetration rates vary by theme park and by visitor category. These indicators are nevertheless indicative of the ranges of potential population and tourist numbers which can support theme parks of a global calibre.
- 13.4.56. Without one global park, the UK is considerably undersupplied on both metrics. The UK's population in 2024 stands at 69.1 million (**Ref. 13.26**) and its tourism arrivals in 2023 were 37.2 million (**Ref. 13.27**). If the UK's provision of theme parks were on par with the average provision across the countries containing the top 25 global theme parks, it would have 2 to 3 global theme parks.

**Table 13-27 – Global top 25 theme park provision per million population and tourism arrivals, 2023**

Country	Count of top 25 global theme parks	Attendance at relevant country top 25 global theme parks	Count per million pop	Count per million international arrivals
US	9	105.4m	0.026	0.135
China	6	50.6m	0.004	0.073
Japan	3	43.5m	0.024	0.119

Country	Count of top 25 global theme parks	Attendance at relevant country top 25 global theme parks	Count per million pop	Count per million international arrivals
France	2	16.1m	0.030	0.020
South Korea	2	11.1m	0.039	0.181
Hong Kong	1	6.4m	0.135	0.287
Germany	1	6.0m	0.012	0.058
Netherlands	1	5.6m	0.055	0.049

Source: AECOM, 2024. Theme Index 2023. Available at: <https://aecom.com/theme-index/>. Accessed May 2025

#### UK theme park provision

- 13.4.57. England's existing theme parks have more of a presence in the AECOM Theme Index EMEA category. According to AECOM, of the top 20 EMEA amusement/theme parks (by visitor number), three were in England, all of which were operated by Merlin (Legoland, Thorpe Park and Alton Towers). Chessington World of Adventures has previously been in the top 20 (and only narrowly missed inclusion in 2023). The AECOM Theme Index reports that Merlin attractions had total attendance of 62.1 million in 2023, of which around one-third occurred at their larger parks and two-thirds at mid- and small-size attractions (such as Madam Tussauds and Sea Life).
- 13.4.58. Out of the UK theme parks with known visitor numbers, Legoland resort attracted the highest number of visitors (2.4m) in 2023. The 'Merlin Annual Pass' enables visitors to visit any Merlin resorts (and indeed other Merlin attractions across the country) over the course of the membership, and therefore the visitor numbers are also likely to be inter-related by nature of this fact.
- 13.4.59. **Table 13-28** presents attendance figures for Merlin UK visitor attractions in both 2019 and latest available attendance figures (**Ref. 13.25, 13.28**). Across the four attractions, latest attendance figures are only 3% below what they were in 2019. It is likely this is a conservative estimation, as 2023 visitor numbers are not available for Chessington World of Adventures, and so 2022 figures are used instead. Alton Towers has experienced the greatest recovery, with visitor numbers 10% higher in 2023 than 2019.

**Table 13-28 – Merlin attraction attendance figures 2019, 2023**

Attraction	2019	2023	% pandemic recovery
Legoland, Windsor	2.43m	2.42m	100%
Alton Towers, Staffordshire	2.13m	2.35m	110%
Thorpe Park	1.90m	1.62m	85%



Attraction	2019	2023	% pandemic recovery
Chessington World of Adventures	1.66m	1.50m	90%
Total	8.12m	7.89m	97%

Sources: AECOM, 2024. Theme Index 2023. Available at: <https://aecom.com/theme-index/>. Accessed May 2025

- 13.4.60. Gulliver's Land in Milton Keynes is the theme park located in the closest proximity to the Proposed Development – approximately a 20-minute drive. The most recent annual attendance that can be found for Gulliver's Land is approximately 400,000 in 2019.
- 13.4.61. Gulliver's Land is one of the many UK theme parks operated by Gulliver's Theme Park and Resorts. The theme parks are specially catered for young families and cater to family budgets with tickets costing around £20. It is difficult to ascertain how these theme parks are performing in terms of business viability. However, ongoing investment in new attractions such as a planned new theme park located in Rother Valley Country Park costing £37m suggests strong performance.
- 13.4.62. Also located near to the Proposed Development (approximately a 1 hour drive) is Warner Bros. Studios – The Making of Harry Potter tour, which opened in 2012 (and has been the subject of three expansions since in 2015, 2017 and 2019). Booking must be made online in advance, and it is frequently booked up months in advance, reflecting high demand. There is no evidence that the opening or multiple expansions of the Harry Potter studio tour had an adverse impact on the visitor numbers at the Merlin Entertainments' resorts.
- 13.4.63. A look at comparable launches shows that new, large-scale parks expand, rather than cannibalise, the visitor pool. When LEGOLAND Windsor opened, its first full season drew 1.47 million guests, yet Alton Towers remained stable at approximately 2.89 million and Thorpe Park held around 0.94 million; together, the three parks were hosting over one million more visits than in 1995, proving net market growth rather than substitution (**Ref 13.92, 13.93 and 13.94**). This shows that when a well themed attraction is opened, it can create a new visitor market.

#### Tourism in the UK

- 13.4.64. The Tourism Sector Deal, published in 2019, states that in 2018 the UK attracted 38 million international visitors, who added £23 billion to the economy, making tourism one of the country's most important industries and the third largest service export. While more recent data from 2019 is used elsewhere in this report, the 2018 figures are cited here as they form the official baseline referenced in the Deal (**Ref. 13.29**).
- 13.4.65. The tourism industry plays a big part in the UK economy. The Tourism Recovery Plan, published in 2021 to set out the Government's policy to enable the UK's world class tourism sector to recover following the pandemic, demonstrated this, noting that (**Ref. 13.30**):
- 13.4.66. *"The tourism industry is one of the UK's great success stories. There were 41 million inbound visits in 2019 and domestic overnight trips in England looked set in 2020 to hit 100 million. Travel was the UK's third largest service export, a catalyst for trade, an engine for growth, a creator of jobs across the length and breadth of the country and a key component of Britain's enviable soft power ranking."*

13.4.67. Visitor numbers in 2023 show that international visits to the UK almost fully recovered by 2023, reaching just shy of 38 million (**Ref. 13.31**). Despite this, international visitors spent more nights in the UK in 2023 than 2019 and spent more money (refer to **Table 13-29**). The total spent by international visitors in the UK in 2023 was equal to over 1% of UK GDP in that year (**Ref. 13.32**).

**Table 13-29 – Total visits, nights and spend in the UK by international visitors, 2019 and 2023**

Metric	2019	2023	2023 % of 2019 total
Visits (million)	40.9	38.0	93%
Nights (million)	290	293	101%
Spend (£million)	28,400	31,100	109%

Source: ONS 2024, International Passenger Survey 2019-2023. Available at: <https://www.visitbritain.org/research-insights/about-international-passenger-survey>. Accessed February 2024

13.4.68. Domestic tourists in the UK play an even larger part in the contribution of the tourism economy. In 2023 there were 117 million overnight trips from domestic tourists, with an average of 2.89 nights spent per trip. This shows a 96% recovery in terms of trips compared to 2019.<sup>5</sup>

**Table 13-30 –Total trips, nights and spend in Great Britain by domestic overnight visitors, 2019 and 2023**

Metric	2019	2023	2023 % of 2019 total
Trips (million)	122	117	96%
Nights (million)	371	339	91%
Spend (£million)	24,650	30,940	126%

Source: Visit England, 2024. Great Britain Tourism Survey. Available at: <https://www.visitbritain.org/research-insights/great-britain-domestic-day-visits-latest-results>. Accessed April 2025

13.4.69. In addition to this there were 3.0 million leisure day visits (of 3 hours or more) with a total expenditure of £109.1bn, of which almost 1.2bn can be classified as full day visits (with £50.8bn associated expenditure).

13.4.70. Adding the international visitor expenditure in the UK (£31.1bn) to both the domestic overnight expenditure (£30.9bn) and domestic full day visitor expenditure (£50.8bn) in Great Britain, this gives a total tourist related expenditure of £110.2bn. This is equivalent to 4.1% of UK GDP for 2023.

---

<sup>5</sup> It should be noted that there was a methodological change in the data collection that means the 2019 and 2023 figures aren't directly comparable. However, both figures are presented here to provide an indication of the scale of post pandemic recovery

### Growing demand for entertainment/leisure

- 13.4.71. There is evidence that people in the UK are now more likely to spend on experiences than previously. Research from Barclaycard found that more than half of its users (52%) would rather pay for a good experience than material possessions (**Ref. 13.33**). The same cohort would also choose to tell their friends and peers about an enjoyable experience rather than a purchase they've made. The desire for experiences is even greater for the younger generation: more than three in four millennials (78%) would choose to spend money on an experience or event over buying something, and 55% of millennials say they're spending more on events and live experiences than ever before (**Ref. 13.34**).
- 13.4.72. Recent evidence also shows an improvement in consumer confidence as pressures surrounding the cost of living crisis began to ease in 2024. Deloitte find that UK consumer confidence rose above the long-term average for the first time since Q3 2021 in Q2 2024 (**Ref. 13.36**), and that consumer confidence remains close to its highest level in five years in Q2 2024 (**Ref. 13.87**). Deloitte report that leisure spending rose year on year (Q1 2024 to Q1 2025), and that consumers continue to prioritise spending on services over goods (**Ref. 13.87**).

### **Future baseline**

- 13.4.73. The International Association of Amusement Parks and Attractions (IAAPA) 2022 – 2026 Global Theme and Amusement Park Outlook Report forecasts a seven percent boost in attendance for theme parks in North America (**Ref. 13.35**). This suggests that there is growing demand to visit major theme parks as the industry continues to recover from the impacts of the pandemic. The report also forecasts that consumer spending would rise by 15% in 2023, which aligns with the 2023 AECOM Theme Index which shows that the theme park and attractions sector has broadly recovered its pandemic-related losses (**Ref. 13.25**).
- 13.4.74. A recent report by Interpark showed that the global amusement park market is expected to grow from \$51bn to \$54bn from 2023 to 2024 and reach up to \$84bn in 2030 (**Ref. 13.37**). This indicates there will be opportunities in the sector going forward.
- 13.4.75. Merlin Entertainments has recently invested over \$2bn US dollars in the construction of three new LEGOLAND parks in China (**Ref. 13.38**). Additionally, in Saudi Arabia, a \$1bn US dollar contract was awarded for the development of the Six Flags Qiddiya Park as part of Saudi's Vision 2030 mega-projects.
- 13.4.76. Major theme park operators like Disney are planning substantial investments to enable long-term growth. In 2023, Disney announced a \$60bn investment plan over the next decade for its parks and experiences (**Ref. 13.38**).
- 13.4.77. UDX have just opened a new theme park, Universal Epic Universe, their fourth theme park in Orlando as of May 2025 (**Ref. 18.82**). This is a \$1bn US dollar project (**Ref. 18.83**). They are also building a Universal Kids Resort in Texas, due to open in June 2026 (**Ref. 18.84**).
- 13.4.78. The UK's population is projected to grow from 67.6m in 2022 to 72.2m in 2031 according to ONS population projections, and the global population is expected to rise from 8.2bn in 2025 to 8.5bn by 2030 and 9.7bn in 2050 (**Ref. 13.39, 13.40**).
- 13.4.79. In terms of domestic tourism trends, recent research by Barclays suggests that there is a growing interest in the 'staycation' in Britain. They report that 55% of tourism businesses reported an increase in domestic tourism from 2017 to 2019 (**Ref. 13.41**). According to holidaymakers, the

attraction of the staycation is driven 34% by convenience, 21% by desire to visit places they haven't before and 19% by the affordability. The increase in staycations since the pandemic shows no sign of slowing down. On average, there are 10,000 monthly Google searches for staycations, and 91% of survey respondents in 2023 stated that they are looking to go on a staycation next year (**Ref. 13.42**). A similar percentage of respondents (88%) in 2024 confirmed they were looking to go on a staycation in 2025 (**Ref. 13.88**). Despite ongoing cost-of-living concerns, the number of UK residents looking into the option of staycations remains high.

### Receptor sensitivity

- 13.4.80. **Businesses across the national study area are deemed to have a high sensitivity to changes in trade creation relating to theme parks.** The expenditure created by, and jobs supported through, the tourism industry play a large part in the performance of the national economy. Currently, the UK has an underrepresentation in the global top 25 for theme park provision. This is a clear gap in the offer of UK tourism. Evidence suggests that residents in the UK are looking to spend more on leisure, specifically experiences, and that consumer confidence is improving.

## ECONOMIC OUTPUT

### Baseline

- 13.4.81. GVA across England sits at £1.9 trillion as of 2022, increasing by over £170 billion from 2021 after a period of slow growth from 2018. GVA in sectors relevant for the tourism economy have grown at varying rates. Official ONS data for 2023 is not yet published but indications suggest that GVA saw further strong growth in 2023 at the National Area (**Ref. 13.43**). Data provided by DCMS indicated that the tourism economy across the UK was worth £74.5bn in 2019, which is broadly equivalent to the combined GVA for the Accommodation and Arts, entertainment and recreation sectors reported by the ONS for 2018 (**Ref. 13.44**). No data is available for post pandemic figures from DCMS as of the time of writing this report.

**Table 13-31 – Total GVA output across specific sectors and across the economy (England) (2018, 2022)**

Sector	2018	2022	Growth across full period
Accommodation	£49 billion	£61 billion	24%
Retail (not including wholesale)	£81 billion	£97 billion	20%
Arts, entertainment, recreation	£25 billion	£28 billion	11%
Total economy	£1.77 trillion	£1.94 trillion	18%

Source: ONS, 2024. Gross Value Added 2022. Available at: <https://www.ons.gov.uk/economy/grossvalueaddedgva>. Accessed March 2025

- 13.4.82. In terms of GDP, the UK experienced its fastest growth in two years in Q1 2024, growing by 0.6%. Despite recent good performance relative to previous years there remains uncertainty whether this will continue (**Ref. 13.45**). In Q4 2023 the UK entered a technical recession given it was the second consecutive quarter of negative economic growth. This uncertainty indicates that businesses across

the UK are sensitive to changes in economic activity. This data indicates that in recent years, GDP growth has been stagnant and flat.

#### Future baseline

- 13.4.83. EY project steady growth in UK GVA from 2024 to 2027 of 1.9% each year (**Ref. 13.46**). Prior to being elected, Sir Keir Starmer had stated that he would target to achieve an annual growth rate of 2.5%. Whilst this is not official Government policy, it is clear that economic growth forms a key part of the new Government's mandate and that measures will be taken to try and bolster growth (**Ref. 13.47**). This ambition has been made clear with the revisions to the *National Planning Policy Framework* (**Ref. 13.21**).

#### Receptor sensitivity

- 13.4.84. **Businesses across the national study area are deemed to have a medium sensitivity to changes in economic output.** The UK has achieved growth post coronavirus pandemic in terms of GVA, with steady growth projected going forward. However, there is some uncertainty as the UK has recently experienced a short recession and achieving stronger growth in the future is key to the new government's aims.

### ADDITIONAL SPENDING

#### Baseline

- 13.4.85. The Theme Park will attract new visitors who will spend time and money in various geographical areas. This section focuses on retail and other leisure and tourism destinations in the area which may benefit from linked trips.

#### Retail

- 13.4.86. The retail industry has evolved considerably over the past decade. The rise of online spending has led to a fundamental shift in how the sector operates, and the coronavirus pandemic further accelerated some of these trends.
- 13.4.87. The trajectory and evolutionary characteristics of online retail, particularly in consumer behaviour, has driven profound shifts in spending. These behavioural shifts have resulted in online retail spend increasing more than four-fold from 2008 to 2019 to over £70bn, from just £13.8bn in 2008 (**Ref. 13.48**). More than one in every four retail sales from textile, clothing, and footwear stores are made from online channels. This has had a large impact on the makeup of high streets, resulting in rising vacancy rates (refer to **Table 13-32**) for retail units.

**Table 13-32 – Retail vacancy rates**

Sector	H1 2013	H1 2018	H1 2023
Shopping centre	15.8%	13.1%	17.8%
High street	12.5%	11.2%	13.9%
Retail parks	9.7%	5.6%	8.1%

Source: Retrieved from : <https://www.localdatacompany.com/>. Accessed March 2025

- 13.4.88. Bedford Town Centre serves as the primary retail and leisure destination within the local authority, offering a diverse array of shops and dining options (**Ref. 13.49**). The proportion of vacant floorspace has recently been growing, attributed partly to recent closures of larger stores.
- 13.4.89. Bedford's retail vacancy rate was 12.9% in 2022, with most visible empty units having been vacated by nationwide chain stores (**Ref. 13.50**). This is lower than the 13.8% retail vacancy rate seen at the National Area across the same period. The Harpur Centre, which is the main shopping centre in Bedford Town Centre had a vacancy rate of 9.6%, which is half the national rate for shopping centres.
- 13.4.90. The retail market across Central Bedfordshire displays varying strengths across different town centres (**Ref. 13.51**). Leighton Buzzard is reported to perform well overall, despite a slight rise in vacancy rates, though still below the national average. However, there is potential for improvement in the food and drink sector to drive footfall and increase dwell times. Dunstable faces challenges with a weak comparison offer and higher than national average vacancy levels, particularly concentrated in the Quadrant Centre. Despite this, the planned reconfiguration of White Lion Retail Park could enhance the comparison retail offer in Dunstable, albeit not in the town centre. Biggleswade shows consistent performance without significant deficiencies, while Ampthill, Flitwick, and Sandy continue to fulfil their roles adequately. Houghton Regis has seen investment with the opening of a new Morrison's supermarket, yet there is room for improvement in the rest of the centre to cater to the needs of visitors.
- 13.4.91. Overall, while some areas show promise, (aligned with national trends) many retail areas are struggling and are in need of improvements to vitality and viability.

#### Economic importance of retail

- 13.4.92. Spending in the retail sector supports retail jobs, so a comparison of retail employment as a proportion of overall employment can give an indication of the importance of retail to local economies. Retail employment as a proportion of overall employment in the CSA and the SRCA is in line with national proportions of retail employment.

**Table 13-33 – Retail employment as a proportion of overall employment across study areas (2022)**

Study area	Retail employment	Retail employment share
CSA	15,500	7.9%
SRCA	36,000	7.2%
England	2.3m	8.2%

Source: ONS, 2024. Business Register and Employment Survey 2023. Available at: <https://www.nomisweb.co.uk/>. Accessed May 2025

#### Local tourism assets

- 13.4.93. There are few major leisure and retail outlets located near the site of the Proposed Development. The few that are located nearby include: The Interchange Retail Park, Alban Retail Park, St. Johns Retail Park and Harpur Shopping Centre.



- 13.4.94. There are two large cinemas located in Bedford. Vue Cinema Bedford has seven screens and can sit over 930 people. Previously, Bedford also had a Cineworld cinema with six screens, but it has since closed.
- 13.4.95. The Proposed Development will draw in significant amounts of trade from both domestic and international visitors. There is potential for visitors to make 'linked trips'; they could visit the Proposed Development one day and visit local attractions another day or attractions in the SRCA. As such, it is important to baseline them in here.
- 13.4.96. **Table 13-34** outlines the various tourist attractions and cultural assets in the SRCA. It is clear from the number of visitors attending these visitor destinations in 2023 that these attractions are smaller scale.
- 13.4.97. The most popular tourist attractions in the SRCA with a significant number of annual visitors are Whipsnade Zoo and Woburn Safari Park. As noted in the previous section, Center Parcs Woburn Forest is also very popular.

**Table 13-34 – Largest visitor attractions in the SRCA by annual visitors (2023 unless stated)**

Attraction	Category	Visitors 2023
Whipsnade Zoo	Zoo	830,000
Bletchley Park	Heritage/Visitor Centre	199,000
Wrest Park	Historic House/ House and Garden/Palace	195,000
Woburn Safari Park	Zoo/Activity Park	490,000 (2015)
Woburn abbey	Historic House/House and Garden	56,000 (2014)
Upside Down House Milton Keynes	Leisure/Theme Park	45,000 (2022)
Milton Keynes Museum	Museum and/or Art Gallery	43,000 (2022)
Ridgmont Station Heritage Centre	Heritage/Visitor Centre	2,000 (2022)
Chicksands Priory	Other Historic Property	<100 (2022)
GoApe Woburn	Activity park	N/A

Source: VisitBritain, 2024. Annual Attractions Full Listings 2023. Available at: <https://www.visitbritain.org/research-insights/england-visitor-attractions-latest>. Accessed May 2025; AVLA, 2023. Visits made in 2023 to visitor attractions in membership with AVLA. Available at: <https://www.alva.org.uk/details.cfm?p=423>. Accessed May 2025.

### Future baseline

- 13.4.98. Each local authority in the SRCA has produced a recent retail capacity study that outlines spend patterns in the relevant geography. The future baseline estimates the expected total turnover across



study areas by 2031 and 2051, against which the impact of the Proposed Development can be assessed. These figures are presented in **Table 13-35** and are calculated through the following steps:

- The following documents have been downloaded: Nexus Planning, 2020. Bedford Town Centre Study (**Ref. 13.49**); Central Bedfordshire, 2017. Central Bedfordshire Retail Study (**Ref. 13.51**); Carter Jonas, 2018. Milton Keynes Retail Capacity & Leisure Study (**Ref. 13.52**); WYG Planning & Environment, 2015. Luton Borough Council Retail Study Update (**Ref. 13.53**);
- The document for each local authority reports total comparison and convenience retail spend capacity by their survey area residents. In order to reflect the spend occurring in town centres in the local authority, adjustments are made to factor in special forms of trading (sft) (such as online spend, telemarketing spend etc.) and spend retained within the local authority (the retention rate). For example, in Central Bedfordshire only 45.9% of total convenience spend capacity of survey area residents is retained within Central Bedfordshire. It is the total retained amount that is carried over for the purposes of this report.
- The relevant locations in each report where convenience and comparison goods spending figures are taken from is as follows:
  - Nexus Planning, 2020. Bedford Town Centre Study: Figures 6.15 and 6.22;
  - Central Bedfordshire, 2017. Central Bedfordshire Retail Study: Table 8 and 12;
  - Carter Jonas, 2018. Milton Keynes Retail Capacity & Leisure Study: Table 3;
  - WYG Planning & Environment, 2015. Luton Borough Council Retail Study Update: Table 3.0 and 3.3;
  - Bedford, Central Bedfordshire and Milton Keynes report a small amount of inflow of spend coming from visitors outside of the local authority. This is not included for Luton;
  - Bedford and Central Bedfordshire further report spend on the food and beverage sector (Figure 6.36 and Table 14 in the respective reports). Combined, food and beverage turnover makes up 14% of comparison, convenience and F&B turnover in these local authorities in 2031 and 13% in 2051. This figure is applied to Luton and Milton Keynes' retail turnover as a proxy to estimate the level of food and beverage turnover in these locations; and
  - Bedford and Central Bedfordshire report a small amount of inflow of spend coming from visitors outside of the local authority. This is included for the relevant geographies, however no proxy is assumed to include for Milton Keynes and Luton.
- A compound annual growth rate (CAGR) is used to estimate 2031 and 2051 values for each of these geographies. The CAGR used reflects the forecast spend patterns nearest to 2051, e.g. Milton Keynes report is uplifted by the CAGR of forecast spend growth from 2027-2031; and
- Price base varies across the different reports. All are uplifted to 2024 prices using the Bank of England inflation calculator (**Ref. 13.54**).

**Table 13-35 – Estimated total retail and F&B turnover across the CSA and SRCA (in £s), 2031 and 2051**

Study area	2031	2051
CSA	£3.93bn	£6.29bn
SRCA	£10.66bn	£20.05bn

Sources: Volterra calculations

### Receptor sensitivity

- 13.4.99. **Businesses at the CSA and the SRCA are both deemed to have a medium sensitivity to changes in visitor expenditure.** Attractions such as Whipsnade Zoo, Woburn Safari Park and Center Parcs Woburn Forest are high performing and draw a considerable amount of annual visitors however town centres are on par with national trends. Retail employment aligns with National Areas. Engagement has highlighted that an increase in footfall will strengthen the retail, tourism, and leisure market across the CSA.

### EMPLOYMENT

#### Baseline

- 13.4.100. The baseline for operational employment generation is split by residential and workplace-based employment data.

#### Residents based

- 13.4.101. In 2023, the CSA had a total population of approximately 498,000, increasing by 15% since 2014, higher than any comparators (refer to **Table 13-36**).

**Table 13-36 – Population percentage growth, 2014-2023**

Sector	2014	2023	% growth across full period
CSA	434,000	498,000	15%
SRCA	913,000	1.0m	13%
LCA	2.6m	2.9m	10%
RCA	19.6m	20.9m	7%
National	54.4m	57.7m	6%

Source: ONS, 2024. Population estimates for the UK, England, Wales, Scotland, and Northern Ireland: mid-2022. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/>. Accessed February 2025.

- 13.4.102. Annual gross pay across residents of the CSA is higher than what is recorded across geographical comparators (**Ref. 13.6**), and 10% higher than the National Area for both full time workers and all workers (refer to **Table 13-37**).

**Table 13-37 – Median annual gross pay, residence based, 2023**

Area	Annual Pay Gross (all workers)	Annual Pay Gross (full time workers)
CSA	£38,800	£41,500
SRCA	£36,900	£39,600
LCA	£38,700	£40,400
RCA	£36,000	£38,700
National	£35,100	£37,600

Source: ONS, 2024. Annual Population Survey. Available at: <https://www.nomisweb.co.uk/>. Accessed March 2025

- 13.4.103. The relevant baseline for the availability of the workforce is provided in the **Construction Phase** section. This covers baseline findings relevant to economic activity, unemployment, and NEETs. In summary, the CSA and SRCA have high economic activity rates and employment rates relative to the National Area. The CSA and SRCA also have lower unemployment rates relative to the National Area.
- 13.4.104. The 2021 Census provides data on the number of working age residents employed in retail and tourism sectors. The CSA and SRCA largely fall in line with national averages in terms the proportion of residents employed in these sectors. Residents in the SRCA have a slightly higher representation in distribution, hotels and restaurants relative to the National Area (21.7% vs 19.9%), and in contrast the opposite is true for arts, entertainment, recreation and other services (4.0% vs 4.6%).

**Table 13-38 – Working age residents employed in retail and tourism sectors, 2021**

Area	Total workforce	Distribution, hotels and restaurants	Arts, entertainment, recreation and other services
CSA	242,000	48,900 (20.2%)	10,900 (4.5%)
SRCA	484,000	105,200 (21.7%)	19,400 (4.0%)
LCA	1.4m <sup>6</sup>	284,000 (20.4%)	59,600 (4.3%)
RCA	9.8m	1.9m (19.5%)	443,000 (4.5%)
National	26.4m	5.3m (19.9%)	1.2m (4.6%)

Source: ONS, 2021. Census. Available at: <https://www.nomisweb.co.uk/>. Accessed March 2025

<sup>6</sup> Data collected using local authority definitions rather than MSOAs. This explains the discrepancy with total workforce as reported in Table 13-9.

### Workplace based

- 13.4.105. The Site where the Proposed Development will be located is currently vacant. Historically, the Site had been a large scale employer, being the location of the former Kempston Hardwick brickworks site. For over 100 years, this area was one of the principal suppliers of bricks to the British construction industry. The industry shaped the growth of Kempston Hardwick, Stewartby and other local villages, and whilst the Site's brickworks were closed and demolished many decades ago, they still form an important part of this area's rich history.
- 13.4.106. In 2023, overall employment in the CSA was approximately 197,000. Employment in the CSA has grown by 14% since 2015, faster than the national rate of 9%. Employment growth has also been strong in both the LCA (13%) and the SRCA (15%).

**Table 13-39 – Employment growth across study areas between 2015 and 2023**

Area	Employment 2015	Employment 2023	Employment growth 2015-2023
CSA	174,000	197,000	14%
SRCA	437,000	501,000	15%
LCA	1.6m	1.78m	13%
RCA	9.0m	9.6m	6%
National Area	25.9m	28.2m	9%

Source: ONS, 2024. Business Register and Employment Survey 2015-2023. Available at: <https://www.nomisweb.co.uk/>. Accessed May 2025

### **Future baseline**

#### Residents based

- 13.4.107. Forecasts for expected resident population, working age population, and employment in 2031 and 2051 are presented for the CSA and SRCA (**Table 13-40**). These are collated from the relevant Local Plans. The current population and employment forecasts from Local Plans do not extend to 2051. For this point in time the annual growth rate from the current plan is assumed to continue and is projected forward. This presents a known limitation, as it is expected that population and employment targets could be adjusted in the future to explicitly reflect both the Proposed Development, as well as wider economic trends.
- 13.4.108. In projecting the future population in each local authority, strategic housing market assessments have been utilised. The population growth based on 10-year migration trends has been used. This is because population forecasts taking into account 10-year migration trends provide the most robust and reliable basis for projecting the future population.
- 13.4.109. The Bedford Strategic Housing Market Assessment Update 2016 (**Ref. 13.59**) outlines that population growth between 2015 and 2035 is expected to be approximately 33,100 over the plan period (pg.iii). This equates to a population growth of approximately 2,200 per annum.

- 13.4.110. The Central Bedfordshire and Luton Strategic Housing Market Assessment (**Ref. 13.58**) outlines an annual projected population growth for Central Bedfordshire of 2,680 (pg.50) and 1,830 for Luton (pg.49).
- 13.4.111. The Milton Keynes Strategic Housing Market Assessment 2016-2031 outlines a total population growth over the period of approximately 47,000 (pg.25). This equates to an annual population growth of approximately 3,100.
- 13.4.112. Therefore, the assumed annualised population growth for the CSA is approximately 4,900 (2,200 + 2,680). The annualised target for the SRCA is 9,900 (2,200 + 2,680 + 3,100 + 1,830).
- 13.4.113. These annual population growth projections based on relevant Strategic Housing Market Assessments are then added to the latest 2023 population estimates from the ONS for the CSA (498,000) and the SRCA (1.03m) annually until 2031 (8 times) and 2051 (28 times) to achieve future baseline population projections.
- 13.4.114. In the period up until 2031, the resident population of the CSA is projected to increase to 537,000. This represents an 8% increase compared to the 2023 population (**Ref. 13.76**). By 2051, the population of the CSA is projected to increase to 635,000, representing a 27% increase relative to the 2023 population.

**Table 13-40 – Projected population growth across areas in the absence of the Proposed Development**

Area	Population 2023	Projected population 2031	Projected population growth 2023 to 2031	Projected population 2051	Projected population growth 2023 to 2051
CSA	498,000	537,000	8%	635,000	27%
SRCA	1.03m	1.11m	8%	1.30m	27%

Source: ONS, 2024. Population estimates for the UK, England, Wales, Scotland, and Northern Ireland: mid-2022. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/>. Accessed February 2025.

- 13.4.115. Based on Local Plan population increase projections, it is projected that the economically active population across the CSA will increase by approximately 12% in the period up until 2031. By 2051, the number of economically active residents in the CSA is projected to increase by 32% relative to 2023 figures. This summarised in **Table 13-41** and is calculated in the following way:
- To achieve the future baseline for residential employment, the average economic activity rate of the last 10 years (2013 – 2023) and the latest information regarding the proportion of the population aged 16 to 65 is applied to the future baseline population projections for 2031 and 2051. The average economic activity rate over the last 10-years across the CSA is 82.5% and across the SRCA is 79.9%. The proportion of the population aged 16 to 65 in 2021 across the CSA was 63% and across the SCRA was approximately 64%.
  - For the CSA, when the average economic activity rate and proportion of the population aged 16 to 65 is applied to the projected population in 2031 (537,000), it is assumed that the 2031 economically active population across the CSA will be approximately 278,200. When the same

figures are applied to the 2051 projected population (635,000), it is assumed that the 2051 economically active population will be approximately 328,800.

- For the SRCA, when the average economic activity rate and proportion of the population aged 16 to 65 is applied to the projected population in 2031 (1.1m), it is assumed that the 2031 economically active population across the SRCA will be approximately 564,700. When the same figures are applied to the 2051 projected population (1.3m), it is assumed that the 2051 economically active population will be approximately 664,300.

**Table 13-41 – Economically active population projections across the CSA and SRCA by 2031 and 2051**

Area	2023 Economically active population	Projected 2031 economically active population	% Change 2023 to 2031	Projected 2051 economically active population	% Change 2023 to 2051
CSA	248,600	278,200	12%	328,800	32%
SRCA	490,300	564,700	15%	664,300	35%

Source: ONS, 2024. Population estimates for the UK, England, Wales, Scotland, and Northern Ireland: mid-2022. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/>. Accessed February 2025.

13.4.116. **Table 13-42** illustrates the projected resident-based employment growth expected in the CSA and SRCA, from the latest available data until each of the assessment years. To achieve this, the same methodology as outlined in Paragraph 13.4.115 is utilised.

**Table 13-42 – Residential employment projections across local authorities that comprise the SRCA by 2031 and 2051**

Local Authority	Overall resident employment 2023	Resident employment 2031	Resident employment growth 2023 to 2031	Resident employment 2051	Resident employment growth 2023 to 2051
CSA	239,300	268,400	13%	318,200	33%
SRCA	471,100	540,400	15%	636,700	35%

Source: ONS, 2023. Annual Population Survey. Luton Borough Council, 2017. Local Plan 2011 – 2031. Bedford Borough Council, 2020. Local Plan 2030. Milton Keynes Council, 2019. Plan: MK 2016 – 2031.

13.4.117. For wider geographies, the process of collating forecasts from Local Plans for all areas would be very time-consuming. It is deemed that this exercise would be disproportionate to the requirements for this assessment. For this reason, at wider geographies the current baseline is relied upon. Where broad trends are known, they are described and their impact upon potential sensitivity discussed.

### Workplace based

13.4.118. Employment is expected to grow significantly across all study areas. Overall employment in the CSA is expected to increase by approximately 13,300 by the opening year of the Proposed Development, representing a 7% increase.

13.4.119. This is calculated in the following way:

- The Bedford Local Plan 2030 (**Ref. 13.56**) covers the period 2015-2030. It has an overall employment target of 6,900 net additional jobs over this period. This equates to an annual target of 460 net additional jobs.
- The Central Bedfordshire Local Plan (**Ref. 13.61**) covers the period between 2015 and 2035. This plan includes a net additional employment target over that period of 24,000, equating to 1,200 net additional jobs annually.
- Plan MK by Milton Keynes Council (**Ref. 13.57**) covers the period 2016 to 2031. It includes a net additional jobs target of 28,000 jobs over the period. This equates to an annual figure of 1,200 jobs.
- Luton Local Plan (**Ref. 13.55**) covers the period 2011 to 2031. It includes an overall employment growth target of 18,000 net additional jobs over this period. This equates to an annual target of 900 net additional jobs.
- Therefore, the annualised target for the CSA is 1,660 (460 + 1,200). The annualised target for the SRCA is 3,960 (460 + 1,200 + 1,400 + 900).
- These annual employment growth projections based on Local Plans are then added to the latest 2023 employment figures from the Business Register and Employment Survey for the CSA (197,000) and the SRCA (501,000) annually until 2031 (8 times) and 2051 (28 times) to achieve future baseline employment projections.

13.4.120. This effect is also assessed at the Proposed Developments year of maturity (2051). By 2051, overall employment across the CSA is expected to increase by approximately 50,800, resulting in a 24% increase.

13.4.121. **Table 13-43** illustrates the projected employment increases across study areas by the opening year of the Proposed Development (2031) and the year of maturity (2051). It is acknowledged that these future projections are subject to uncertainty, but this reflects the most appropriate and available proxy for anticipated growth in the future to the assessment years, in the absence of the Proposed Development.

**Table 13-43 – Employment projections across study areas**

Area	Employment increase 2023 to 2031	% Employment increase 2023 to 2031	Employment increase 2023 to 2051	% Employment increase 2023 to 2051
CSA	13,300	7%	50,800	24%
SRCA	39,100	7%	137,000	25%

Source: ONS, 2024. Business Register and Employment Survey 2023. Available at: <https://www.nomisweb.co.uk/>. Accessed May 2025; Nexus Planning, 2020. Bedford Town Centre Study. Available at: <https://www.bedford.gov.uk/>.



Accessed May 2025; Central Bedfordshire, 2017. Central Bedfordshire Retail Study, Available at: <https://centralbedfordshire.oc2.uk/>. Accessed May 2025; Carter Jonas, 2018. Milton Keynes Retail Capacity & Leisure Study. Available at: <https://www.milton-keynes.gov.uk/>. Accessed April 2025; WYG Planning & Environment, 2015. Luton Borough Council Retail Study Update

## Receptor sensitivity

13.4.122. Residents are the receptors for changes in employment generation. The sensitivities of the respective study areas are deemed to be as follows:

- The CSA – high sensitivity: the CSA has experienced rapid population growth over the last decade, faster than all comparator study areas. This population growth is projected to continue with faster population growth than comparator study areas up until both 2031 and 2051. Additionally, the economic activity rate is the highest of all study areas. Although the unemployment rate across CSA is lower than the national rate, there is a high proportion of the population seeking employment relative to comparator study areas, indicating a dynamic economy which can be sensitive to changes in employment generation.
- SRCA – high sensitivity: population growth across the SRCA is the second fastest of all study areas. Whilst the economic activity rate across the SRCA is stronger than the national rate, it does have a higher unemployment rate than national.
- LCA – medium sensitivity: this study area has had a significant population increase over the last decade and has the highest businesses density per 100,000 population. Compared to the national rate, the LCA has a higher economic activity rate and a lower unemployment rate.
- National – medium sensitivity: this study area is stable and unlikely to be significantly impacted by changes in employment generation. However, given wage stagnation over a long period of time (**Ref 13.77**), it is judged that residents across the national area would respond to a change in the quality and quantity of employment offerings.

## SKILLS FOR LOCAL PEOPLE

### Baseline

#### School performance

- 13.4.123. Across the CSA there is an identified shortfall in KS2 educational attainment relative to geographical comparators. In the CSA 26.2% of KS2 students do not meet their expected level of attainment compared to 22.8% across the East of England and 21.8% nationally (**Ref. 13.62**). There is a requirement for educational outcomes at KS2 level to improve across the CSA to catch up with regional and National Areas to make sure that no generation is left behind.
- 13.4.124. GCSE English and Maths attainment rates in the CSA are lower than across the National Area for all children (**Table 13-44**). This is true across both students eligible and not eligible for free school meals in the CSA.
- 13.4.125. The level of income has an influence on attainment at all geographies. Students eligible for free school meals (FSMs) have considerably lower attainment rates in GCSE English and Maths than

students not eligible for FSMs. This is true across all geographies but the gap is particularly evident in Central Bedfordshire.<sup>7</sup>

- 13.4.126. The gap in the pass rate of those who are eligible for FSMs and those that are not, is larger in both Bedford and Central Bedfordshire than across the National Area, as shown in **Table 13-44**. Across Central Bedfordshire this gap is particularly significant, with only 46% of children that are eligible for FSMs passing GCSE English and only 42% passing GCSE Maths, compared to pass rates of 77% and 76% for children that are not eligible for FSMs. This creates a 30 percentage point gap in GCSE attainment and a 34 percentage point gap in GCSE Maths attainment in Central Bedfordshire between children that are eligible for FSMs and children that are not eligible for FSMs. This compares poorly to a national attainment gap of 25 percentage points for GCSE English and a 27 percentage point gap for GCSE Maths (**Ref. 13.63**).

**Table 13-44 – GCSE standard pass attainment in English and Maths by FSM status, 2021/22 academic year**

Area	English		Maths		Percentage point attainment gap : English	Percentage point attainment gap : Maths
	Eligible for FSM (%)	Not eligible for FSM (%)	Eligible for FSM (%)	Not eligible for FSM (%)		
Bedford	57	80	46	77	26	30
Central Bedfordshire	40	74	42	76	30	34
National Area	56	81	50	77	25	27

Source: DfE, 2024. Explore Education Statistics. Note: figures may not sum due to rounding

- 13.4.127. Across the CSA, there is a lower proportion of schools that are rated as good or outstanding by Ofsted than there is across geographical comparators. The proportion of schools in Bedford that are rated good or outstanding is 7 percentage points lower than the proportion across the East of England, and 8 percentage points lower than the national rate. Across Central Bedfordshire, this gap is 4 percentage points compared to the East of England and 5 percentage points compared to the national rate (**Table 13-45**).

**Table 13-45 – Percentage of schools rated good or outstanding by Ofsted (2024)**

Area	Percentage of schools good or outstanding (%)
Bedford	82

<sup>7</sup> Note: Children are eligible for FSMs if their parents are entitled to any of the following types of support which are typically associated with low income: Income support; Income-based Jobseeker's Allowance; Income-related Employment and support allowance; Support under Part VI of the Immigration and Asylum Act 1999; The guaranteed element of Pension Credit; Child Tax Credit; Working Tax Credit; and Universal Credit.

Area	Percentage of schools good or outstanding (%)
Central Bedfordshire	85
East of England	89
National Area	90

Source: ONS, 2024. School Performance Tables. Available at: <https://www.gov.uk/school-performance-tables>. Accessed December 2024

### Future baseline

- 13.4.128. No forecasts for resident qualifications, attendance or performance or educational institutions, worker incomes and apprenticeship starts and completions are available and so the effect is assessed against the current baseline.

### Receptor sensitivity

- 13.4.129. **Residents in the CSA are deemed to have a medium sensitivity to changes in employment and skills opportunities.** The CSA aligns with national rates in terms of qualifications and has a lower proportion of residents with no qualifications. There is also strong performance in apprenticeship engagement and achievements in the CSA relative to comparator study areas. However, there is evidence to suggest that school children have lower attainment in the CSA than national averages, and there exists a great disparity between achievement between children eligible and ineligible for FSMs.

## VISITOR ACCOMMODATION

### Baseline

- 13.4.130. A full baseline of visitor accommodation in the CSA and SRCA is presented from Paragraph **13.4.24**.
- 13.4.131. Experience Bedfordshire outlines the key things to do in Bedfordshire (**Ref. 13.64**). Key things to do include visiting family-friendly zoos and partaking in outdoor activities. There are several historic landmarks and museums, and an array of market towns to visit. In the engagement process for the Proposed Development, Experience Bedfordshire reported that their research concluded that the current hotel accommodation in Bedfordshire wasn't sufficient to support the tourist attractions it has on offer. Experience Bedfordshire noted the need for another 'destination' to appeal to a wider audience and act as a catalyst for further hotel development. Their research concluded that enhanced hotel provision will support the rest of the tourism and cultural asset offering in Bedfordshire, but that it needed something to catalyse the hotel provision to increase.

### Future baseline

- 13.4.132. A full future baseline of visitor accommodation in the CSA and SRCA relative to comparators is presented from Paragraph **13.4.32**.

### Receptor sensitivity

- 13.4.133. **Businesses in the CSA is deemed to have a high sensitivity to change in the demand for visitor accommodation, whilst the businesses in the SRCA are deemed to have a medium**

**sensitivity to change.** Engagement has highlighted that an increase in footfall will strengthen the retail, tourism, and leisure market across the CSA. However, the area needs something to catalyse the delivery of more visitor accommodation.

## CONVENTION/CONFERENCE CENTRE PROVISION

### Baseline

- 13.4.134. The closest conference facility to the Proposed Development is at Center Parcs Woburn Forest, located approximately a 10-minute drive from the Proposed Development. Center Parcs Woburn Forest Conference and Events facility has capacity for a 400 person reception and a 250 person seated dinner.
- 13.4.135. The King's House Conference Centre in Bedford is also located near to the Proposed Development, approximately a 15-minute drive. This facility has the capacity to accommodate up to 550 people in one of its rooms at any one time.
- 13.4.136. There are several other smaller events facilities located near the Proposed Development, however considering the offering of the Proposed Development, these will not be impacted by the proposed conference facility due to their smaller scale and the fact that they are more specialised in providing workspaces. These facilities include: Bedford Heights and Wyboston Lakes.
- 13.4.137. Prime Minister Keir Starmer has highlighted the importance of the events industry as a catalyst for economic growth in the UK. In October 2024, his administration hosted the International Investment Summit at London's Guildhall, convening approximately 300 industry leaders. This event was designed to showcase the UK as a stable and attractive destination for business, emphasizing the government's commitment to fostering economic growth through strategic partnerships and investments (**Ref 13.89**).
- 13.4.138. The UK International Business Events Action Plan 2019 – 2025, which seeks to promote the UK as a leading European country for hosting business events and conferences, aims to make sure that the existing UK international events are grown in scale and new events are attracted to UK venues (**Ref 13.65**). Whilst this plan has not yet been renewed by the current government, it does show evidence of a recent acknowledgement of the role the events sector can play in growth.
- 13.4.139. The UK has several major conference facilities. The largest of which, is the National Exhibition Centre in Birmingham, with total space of 182,000 sqm, followed by ExCeL London which has 100,000 sqm of space (**Ref. 13.86**).
- 13.4.140. ExCeL London hosts approximately 1.35m sqft of space, and can host up to 68,750 visitors at one time across its various halls and spaces (**Ref. 13.85 and 13.96**). It is likely that the NEC can accommodate even more visitors given its size of approximately 2m sqft (**Ref 13.97**). One of the facilities there can hold up to 15,685 people.
- 13.4.141. In the UK, the growing demand for conference facilities is being significantly driven by businesses' increasing preference for in-person events (**Ref. 13.66**). This trend is fuelled by the recognition of the unique value that face-to-face interactions bring to business engagements and networking.

### Future baseline

- 13.4.142. The conference and exhibition facilities market in the UK has recorded a strong recovering trajectory. From a drastic drop to 195,000 events in 2020, the sector climbed to an estimated 1.02

million events in 2022, with direct expenditures rising from £4.9 billion in 2021 to close to £17.6 billion in 2022, nearly reaching pre coronavirus pandemic levels (**Ref. 13.67**).

- 13.4.143. Investment in conference facilities has shown an upward trend, indicating a positive outlook and greater optimism about the future. Although still below pre-pandemic levels, the increased investment (over 70% of venues developing their product) reflects confidence in the sustained growth of the sector (**Ref. 13.67**).

#### **Receptor sensitivity**

- 13.4.144. **The CSA is deemed to have a medium sensitivity to changes in the provision of convention and conference facilities.** Local facilities like Center Parcs Woburn Forest and King's House Conference Centre currently cater to events with a requirement for less than 400 people. National policies are pushing for the growth of the conference sector and market trends favour in-person business events. The area has no conferencing facilities capable of attracting larger events.
- 13.4.145. **The National Area is deemed to have a medium sensitivity to changes in the provision of convention and conference facilities.** The outlook for the sector appears positive following uncertainty surrounding the coronavirus pandemic. However, time will be required to fully understand the outlook of the sector following the uncertainty of the pandemic. There is a pipeline of future space in the sector, with the Olympia development set to come forward in 2025. Given this, a medium sensitivity is appropriate as opposed to high.

### **DISRUPTION OF BUSINESSES**

#### **Baseline**

- 13.4.146. A full baseline analysis of local business assets has been undertaken earlier in this chapter. This can be seen in **Table 13-24**.

#### **Future baseline**

- 13.4.147. A discussion of the future baseline for local business assets has been undertaken earlier in this chapter. This can be seen from Paragraph **13.4.40**.

#### **Receptor sensitivity**

- 13.4.148. **Businesses in the Local Area are deemed to be of high sensitivity to disruption**, as vehicular access forms a key requirement for the effective functioning of their activities. This differs across the different types of businesses, logistics and industrial businesses who require vehicle access for customers and suppliers have a higher sensitivity than retail businesses who are likely to rely on customers accessing via foot rather than vehicle. However, the location of some retail businesses in the car industry alongside presence of businesses who rely on vehicle access, it is conservatively assumed that businesses in the Local Area have a high sensitivity to disruption.

### **EMERGENCY SERVICES**

#### **Baseline**

- 13.4.149. A full baseline analysis of local emergency services has been undertaken earlier in this chapter. This can be seen from Paragraph **13.4.42**.

## Future baseline

13.4.150. A discussion of the future baseline for service providers has been undertaken earlier in this chapter. This can be seen from Paragraph **13.4.48**.

## Receptor sensitivity

13.4.151. **Service providers in the CSA and SRCA are judged to have a medium sensitivity to changes in demand for local emergency services.** Both the CSA and SRCA have reported issues with regards to the performance and staffing of the police force. Fire accidents occur lower than the national rate, but the response time is marginally higher in the CSA and SRCA. The response time for ambulances is in line with the national rate.

## RECEPTOR SENSITIVITY SUMMARY

**Table 13-46 – Sensitivity of receptors for each effect**

Effect	Receptor, study area: sensitivity
<b>Construction Phase</b>	
Construction employment	Residents, LCA: Medium
Construction skills and training	Residents, CSA: Medium
Temporary effects on accommodation	Businesses, CSA: High Businesses, SRCA: Medium Residents, CSA: Medium Residents, SRCA: Medium
Disruption to local business	Businesses, Local Area: High
Emergency services	Service providers, CSA: Medium Service providers, SRCA: Medium
<b>Operational Phase</b>	
Trade creation	Businesses, National: High
Economic output	Businesses, National: Medium
Additional spending	Businesses, CSA: Medium Businesses, SRCA: Medium
Employment	Residents, CSA: High Residents, SRCA: High Residents, LCA: Medium Residents, National: Medium

Effect	Receptor, study area: sensitivity
Skills and training	Residents, CSA: Medium
Visitor accommodation	Businesses, CSA: High Businesses, SRCA: Medium
Convention centre provision	Businesses, CSA: Medium Businesses, National: Medium
Disruption to local businesses	Businesses, Local Area: High
Emergency services	Service providers, CSA: Medium Service providers, SRCA: Medium

## 13.5. ASSESSMENT OF POTENTIAL EFFECTS, MITIGATION AND RESIDUAL EFFECTS

### CONSTRUCTION PHASE

**Table 13-47 – Assessment of potential effects, additional mitigation, residual effects and monitoring during construction**

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
Construction employment		
Residents (LCA)	Potential Effects	<p><u>Direct employment</u></p> <p>The Proposed Development will support 5,380 direct construction jobs at its peak of the Primary Phase in winter 2029. The estimate for this direct employment is provided by UDX based on their industry experience of constructing recent similar sized developments in Beijing and Orlando.</p> <p>Of the 5,380 workers at the peak, it is anticipated 4,525 will be hired from the UK, and the remaining 855 would be hired from abroad. The 855 foreign workers are workers employed by UDX who would move to the UK during construction from abroad, as well as the estimated number of ride and show construction workers from abroad they expect to hire, again based on recent experience from other global operations.</p> <p>At its peak employment, the Proposed Development's domestic construction workforce will require the equivalent of 3.2% of the number of residents in the LCA who work in the construction sector (<b>Ref. 13.4</b>). This peak is expected to occur in winter 2029.</p> <p><u>Indirect and induced employment</u></p> <p>It is important to consider the net additional impacts of the workers. The HCA Additionality Guide (<b>Ref. 13.68</b>) provides a framework for estimating this based on displacement and multiplier factors.</p>



Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring
	<p>The MHCLG appraisal guidance (2025) (<b>Ref. 13.69</b>) has superseded the HCA Additionality Guide, which has now been withdrawn. The MHCLG guide reflects the revised Green Book (2020) and Levelling Up White Paper (2022), providing additional advice on how to rigorously assess value for money and a greater focus on spatial and distributional impacts. However, in the context of additionality, the guidance is not as detailed in terms of specific assumptions around additionality. Therefore, the HCA Additionality Guide remains the most applicable and robust guidance and it is deemed appropriate to utilise it to assess additionality.</p> <p>Net additional employment establishes how many additional jobs are created elsewhere in the economy due to the activities at the Primary Phase of construction. The two factors considered are the displacement and multiplier effect. These factors are applied across the LCA.</p> <ul style="list-style-type: none"> <li>• Displacement – this measures the extent to which jobs supported are offset by reductions in employment elsewhere. In other words, the extent to which jobs would have been supported elsewhere in the LCA in the absence of the Project. The construction workforce is highly mobile, moving to where there is work or between construction projects as demand requires. A displacement of 25% is applied at the LCA level. This reflects a “low” displacement as per the industry standard reported in the HCA additionality guide. A low displacement is appropriate at this geography given the size and scale of the Primary Phase of construction. Whilst there would be other construction opportunities in the LCA, it is not likely there would be many opportunities with the scale and complexity of the Proposed Development. Applying this to the 4,525 direct jobs in the peak that would be taken up by UK residents gives 3,395 direct jobs.</li> <li>• Multiplier – The multiplier impact is the indirect and induced benefit of other sectors supported by the construction project, generated through supply chain and worker expenditure. The scale of multiplier effects vary by intervention, industry and geography. The HCA Additionality Guide provides ‘ready reckoner’ composite multipliers for different geographical scales. It also reports multiplier effects by industry from estimates produced by Oxford Economics. However, the latter (industry specific) are only available at a National Area. The analysis here focuses on the indirect and induced impacts at the LCA level. To calculate a construction multiplier at the LCA geography, the ‘ready reckoner’ medium multiplier of 1.5 at a regional level is taken. This is then adjusted by the relative difference between the national construction multiplier (2.7) and the all-industry average multiplier (2.2), resulting in an uplifted regional construction multiplier of 1.8. The construction industry relies heavily on its supply chain compared to other industries, leading to a higher-than-average indirect and induced effect. A multiplier of 1.8 is therefore reasonable to account for the impact of the construction supply chain. Applying this multiplier to the 3,395 net direct jobs created in the peak gives a total of 6,110 net additional jobs in the LCA.</li> </ul> <p>The provision of 4,525 direct construction jobs for UK residents in the peak of the Primary Phase is equivalent to 3.2% of the residential construction workforce in the LCA.</p>

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
		<p>To be conservative, it is assumed that 71% of these jobs would be LCA residents. This is based on the percentage of construction workers in the East of England who reported they were residents of that region in a CITB survey (<b>Table 13-10</b>). This is conservative as this was the lowest percentage out of regions in the RCA but is judged to be a reasonably proxy given the mobility of the sector.</p> <p>Applying the 71% figure results in an estimated 3,215 jobs being taken by LCA residents in the peak (2.3% of LCA residents working in construction).</p> <p>The <b>direct employment opportunities would have a medium magnitude impact on residents in the LCA</b>. This effect is bolstered when taking into account the indirect and induced employment provided through the multiplier effect.</p> <p>The sensitivity of residents across the LCA is medium. The magnitude of impact is medium in 2029. This results in a <b>direct/indirect, temporary, short term, moderate beneficial effect (significant)</b> in 2029.</p>
	Additional Mitigation	None.
	Residual Effects	<p>As there is no additional mitigation the residual effects are the same as the potential effects outlined above. This is repeated below for clarity:</p> <p>The sensitivity of residents across the LCA is medium. The magnitude of impact is medium in 2029. This results in a <b>direct/indirect, temporary, short term, moderate beneficial residual effect (significant)</b> in 2029.</p>
Construction skills and training		
Residents (CSA)	Potential Effects	<p>The Proposed Development provides a number of opportunities for meaningful employment and the development of local skills and training. As previously stated, 5,380 construction workers will be employed at the peak of the construction process. An estimated 4,525 will be sourced from the UK and 855 will be sourced from abroad. The domestic sourced workforce (at peak) will require the equivalent of 3.2% of the residential construction workforce in the LCA. Construction workers in the CSA have an estimated average income of either £38,400 (workplace based) or £44,800 (residential based), which is 9% higher than the average income of £35,300 or £41,200 for all workers in the area. Work in the construction industry is thus a valuable path towards prosperity in the area, one which is boosted by the Proposed Development.</p> <p>The employment opportunities in the peak of the Primary Phase are expected to be wide ranging and consist of land trades, ride and show vendors, staging and layout and operations and technical staff. The sheer volume of employment that will be supported during the Primary Phase provides the opportunity to support high numbers of apprenticeships in general construction roles. Such roles generally have low barriers to entry, providing valuable opportunities for individuals with fewer qualifications or from disadvantaged backgrounds to access high quality training and employment. For more information regarding types of jobs supported during construction refer to <b>Employment and Skills Plan (Document Reference 6.12.0)</b>.</p> <p>Based on the scale of construction opportunities, the commitments within the <b>Employment and Skills Plan (Document Reference 6.12.0)</b>, and the</p>

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
		<p>commitment to continued collaboration with the host local authorities and education providers, <b>the magnitude of this effect is assumed to be Low for residents at the CSA</b>. It is unlikely residents in the CSA would benefit from a construction project of this size and scale in the absence of the Proposed Development.</p> <p>The sensitivity of residents across the CSA is medium. The magnitude of impact is low. This results in a <b>Direct, Temporary, Medium Term, Minor Beneficial Effect (Not Significant) from 2026-2031</b>.</p>
	Additional Mitigation	<p>UDX has a long track record of providing valuable training and skills initiatives, having completed a number of initiatives that work with local schools and provide training from their sites, including in Orlando and Japan. <b>Employment and Skills Plan (Document Reference 6.12.0)</b> provides initiatives designed to maximise the employment and skills benefits for residents in the CSA (as well as other nearby local authorities). The responsibility of implementing these initiatives will be that of the Principal Contractor(s) during construction.</p> <p>Employment and skills related measures are outlined in <b>Employment and Skills Plan (Document 6.12)</b>, and secured through the <b>Proposed Operative and Controlling Documents (Document Reference 1.16.0)</b>.</p> <p>Specific measures are summarised below:</p> <ul style="list-style-type: none"> <li>UDX will make sure that Principal Contractor(s) actively engage with local students within Bedford and Central Bedfordshire and give priority access to qualified local students in the hiring process.</li> <li>UDX will require that the Principal Contractor(s) for Theme Park construction will have 'The 5% Club' accreditation (or equivalent at the time of contracting services). This will make sure that the Principal Contractor(s) of the proposed Theme Park is committed to providing 5% of positions in 'earn and learn' positions, including apprenticeships, sponsored students, and graduates on formalised training schemes. Members of 'The 5% Club' across the UK collectively employ more than 1.8m employees, 79,000 apprentices, 18,000 people on graduate programmes, and 9,000 sponsored students. This means that more than 106,000 people have been given skills based training opportunities by 'The 5% Club' members.</li> <li>UDX commits to ensuring that local skilled workers within Bedford and Central Bedfordshire receive priority access to employment opportunities. Principal Contractor(s) will be required to actively promote these opportunities, emphasising the importance of hiring qualified people locally within Bedford and Central Bedfordshire;</li> <li>UDX will require the Principal Contractor(s) and any relevant sub-contractors to pay at least the National Living Wage. A fair and liveable wage enables employees to lead a dignified life, with access to the opportunities and choices needed to fully participate in society.</li> </ul>
	Residual Effects	<p>Based on the scale of construction opportunities, the commitments within the <b>Employment and Skills Plan (Document Reference 6.12.0)</b>, and the commitment to continued collaboration with the host local authorities and education providers, <b>the magnitude of this effect is assumed to be Medium for residents at the CSA</b>. It is unlikely residents in the CSA would benefit from</p>

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
		<p>a construction project of this size and scale in the absence of the Proposed Development.</p> <p>The sensitivity of residents across the CSA is medium. The magnitude of impact is medium. This results in a <b>Direct, Temporary, Medium Term Moderate Beneficial Residual effect (Significant) from 2026-2031.</b></p>
Temporary effect on accommodation market		
<p>Businesses (CSA, SRCA)</p> <p>Residents (CSA, SRCA)</p>	<p><b>Potential Effects</b></p>	<p>Owing to the scale of construction in the Primary Phase and the location of the Proposed Development, some workers will likely need to be sourced from outside of a reasonable commutable distance and may require accommodation. Additionally, a number of roles require skills and experience that cannot be sourced from the UK, and so workers will be sourced from abroad who will definitely require accommodation.</p> <p>As described in <b>Appendix 13.1: Temporary Workforce Accommodation Strategy (Volume 3)</b>, there are a range of accommodation options that can be drawn upon to meet this need, with certain workers requiring different options depending on their income, length of stay, and number of dependents who are likely to be brought with them.</p> <p>It is assumed, based on past experience of UDX, that longer-term workers from abroad will likely prefer to utilise Private Rented Sector (PRS) accommodation, other workers sourced from abroad might utilise PRS or serviced accommodation (largely consisting of hotels), and domestic workers brought in from outside of the one-hour commuting area are also likely use serviced accommodation (hotels).</p> <p><u>Proportion of domestic workers that might require temporary accommodation</u></p> <p><b>Appendix 13.1: Temporary Workforce Accommodation Strategy (Volume 3)</b> details the assessment of likely impact of construction workers on temporary accommodation at the peak period (expected to be in Q4 2029). It tests a range of 5% - 15% for domestic workers requiring temporary accommodation.</p> <p>CITB research finds that in the East of England, the South East and the East Midlands, on average approximately 4% - 7% of construction workers required temporary accommodation in 2022. The East of England had the lowest (4%) percentage of construction workers who required temporary accommodation in 2022 (<b>Ref. 13.5</b>). Further research shows that between 24% - 29% of construction workers in these regions have a permanent residence outside of the region, most of whom are in neighbouring regions and so can commute.</p> <p>Approximately 77% of the local authorities within the LCA boundary are situated in the East of England. Consequently, a lower bound estimate for workers requiring accommodation of 5% is used (based on the CITB finding for the East region of 4%) is used.</p> <p>A conservative approach for the upper bound estimate assumes that up to 15% of the domestic workforce will come from outside the LCA and these workers will require accommodation.</p> <p><u>Absolute numbers of workers who may require temporary accommodation</u></p> <p>The following absolute numbers of different types of workers are used in determining likely demand:</p>

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring
	<ul style="list-style-type: none"> <li>- 165 longer-term international workers who would likely bring their families, therefore likely opting for more longer-term rentals (predominantly in the PRS).</li> <li>- 695 other non-UK based employees are likely to require shorter-term accommodation, therefore most likely making use of either shorter-term PRS rentals or the local hotel stock.</li> <li>- 225 to 680 (derived from the 5% - 15% assumptions described above) domestic workers who might require accommodation. These are most likely to utilise local hotel stock.</li> </ul> <p><u>Demand for serviced and non-serviced accommodation stock</u></p> <p><b>Appendix 13.1: Temporary Workforce Accommodation Strategy (Volume 3)</b> presents a full analysis on what this would mean for the accommodation stock. Key conclusions to inform this ES chapter are summarised below. Between 225 - 1,375 workers in the peak period are expected to demand serviced accommodation rooms. The 225 is based on the lower bound of domestic demand, and assumes all foreign workers use the PRS. The 1,375 is based on the upper bound of domestic demand, and assumes all shorter-term, foreign workers also use hotels.</p> <p>There are 2,840 hotel bedrooms in the CSA, rising to 9,225 across the SRCA. Applying peak occupancy statistics to these results in an estimate of 535 available bedrooms in the CSA, or 1,640 across the SRCA.</p> <p>The demand from temporary workers would therefore equate to between 42% - &gt;100% of available stock (based on occupancy stats) in the CSA and between 14%-84% of available stock in SRCA.</p> <p>In a cautious worst case scenario, it is therefore possible that the construction workforce utilise all of the available serviced and non-serviced accommodation stock in the CSA, and almost all in the SRCA. This would have a positive impact on visitor accommodation businesses by providing demand.</p> <p><u>Demand for private rented sector</u></p> <p>Between 165 - 855 workers would require private rented sector properties. The 165 is based on all longer-term international workers who are deemed very likely to utilise the PRS. The 855 takes these workers, plus all (695) shorter-term foreign workers, who are also fairly likely to prefer to use the PRS.</p> <p>There were 3,130 - 7,425 PRS properties available the CSA and SRCA. Between 2-28% of stock would be taken by workers. This assumes that one worker would take one property. This analysis shows that even in a cautious worst case scenario there would be sufficient stock available to house those workers who require PRS accommodation. This would have a negative impact on pushing up rental prices in the CSA and SRCA through increased demand. However, both study areas are deemed to have sufficient stock to cope with this effect, even in a cautious worst case scenario.</p> <p><u>Conclusion</u></p> <p>There is expected to be an increase in demand for serviced and non-serviced accommodation and the PRS stock in the CSA and SRCA as a result of the Primary Phase construction temporary workers.</p>



Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring
	<p>A cautious worst case scenario expects the PRS stock to be able to cope with this demand. As a result, the impact on residents of the CSA and SRCA is judged to be of negligible magnitude.</p> <p>There is potential for construction workers to require a significant proportion of available visitor accommodation capacity within the CSA which would be beneficial for visitor accommodation businesses. Taking into consideration the short period of time this demand would take place, this is judged to be of low magnitude across the CSA and negligible across the SRCA.</p> <p>Should demand exceed that available and constraints start to be identified, the mitigation measures put in place (outlined in <b>Appendix 13.1: Temporary Workforce Accommodation Strategy (Volume 3)</b>) and secured by <b>Condition</b> will make sure that should capacity not be able to meet the demand, temporary workforce accommodations will be provided.</p> <p><u>Conclusions</u></p> <p>The sensitivity of businesses across the CSA is high. The magnitude of impact is negligible. This results in a direct, temporary, <b>minor/negligible beneficial effect (not significant)</b> in 2029.</p> <p>The sensitivity of businesses across the SRCA is medium. The magnitude of impact is negligible. This results in a direct, temporary, <b>minor/negligible beneficial effect (not significant)</b> in 2029.</p> <p>The sensitivity of residents across both the CSA and SRCA is medium. The magnitude of impact is low. This results in a direct, temporary, <b>Minor Adverse Effect (Not Significant)</b> in 2029.</p>
Additional Mitigation	<p>Whilst the above analysis indicates that provision of temporary workforce accommodation would not be necessary, UDX are aware that there is great flexibility as to where labour might come from depending on the Principal Contractor(s).</p> <p>Given this, UDX are prepared to instruct the Principal Contractor(s) to provide temporary accommodation if a problem with the supply of accommodation is identified by key stakeholders during construction.</p> <p>The monitoring of whether any temporary workforce accommodation is required and the delivery of such temporary workforce accommodation would be secured through a condition attached to any planning permission for the Proposed Development requiring:</p> <ul style="list-style-type: none"> <li>■ The monitoring of workforce accommodation patterns starting upon the conclusion of the earthworks and grading phase of construction (estimated to be Autumn 2027).</li> <li>■ A quarterly monitoring report to be produced for discussion at the next socio-economic taskforce meeting to take place after production of the report.</li> <li>■ That if the quarterly monitoring report determines that more than 535 serviced accommodation rooms within the core study area (Bedford and Central Bedfordshire) are being used by the construction workers for the Proposed Development (the "Threshold"), implementation of the following mitigation measures:</li> <li>■ Upon the Threshold being hit for the first time, an action plan would be prepared detailing how any temporary workforce accommodation facility</li> </ul>

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
		<p>would be provided and the action plan would be submitted and presented to the socio-economic taskforce; and</p> <ul style="list-style-type: none"> <li>■ If the next two subsequent consecutive quarterly monitoring reports demonstrate that the Threshold is still being exceeded, the provision of a temporary workforce accommodation facility (which may be on-Site or off-Site) but if both Bedford BC and Central Bedfordshire BC confirm in writing that the exceedance of the Threshold in a given quarter is not an issue then this quarter would not be counted towards determining whether a temporary workforce accommodation facility is required.</li> <li>■ Should it be determined that the accommodation facility is not required, in the event that the Threshold is breached again, a further action plan should be produced and presented to the socio-economic taskforce and the process in the above bullet repeats.</li> <li>■ The Monitoring Reporting shall continue until Grand Opening. Such monitoring would restart should future construction works include above 2,500 construction workers at any one time. At which point, it will continue until the Secretary of State determines at his or her discretion that the monitoring is no longer required or where the number of construction falls to 2,500 or below (whichever occurs first).</li> <li>■ To the extent that any temporary workforce accommodation facility constitutes two or more dwellings to be temporarily provided in a building with 18 or more metres in height or which contains 7 or more storeys then a fire statement would be prepared before such building is occupied.</li> </ul> <p>This approach and details of what would be included in the monitoring reports are detailed in <b>Appendix 13.1: Temporary Workforce Accommodation Strategy (Volume 3)</b> which will be secured through a proposed condition.</p>
	<b>Residual Effects</b>	<p>The sensitivity of businesses across the CSA is high. The magnitude of impact is low. This results in a direct, temporary, <b>moderate/minor residual beneficial effect (not significant)</b> in 2026-2031.</p> <p>The sensitivity of businesses across the SRCA is medium. The magnitude of impact is low. This results in a direct, temporary, <b>minor residual beneficial effect (not significant)</b> in 2026-2031.</p> <p>The sensitivity of residents across both the CSA and SRCA is medium. The magnitude of impact is negligible. This results in a direct, temporary, <b>Minor/Negligible Adverse Residual Effect (Not Significant)</b> in 2029.</p>
<b>Disruption to business</b>		
Businesses (Local Area)	<b>Potential Effects</b>	<p>Construction activities will be limited as set out in <b>Appendix 2.3: Outline Construction Environmental Management Plan (OCEMP) (Volume 3)</b>.</p> <p><b>Appendix 5.1: Transport Assessment (Volume 3)</b> finds that there are some noticeable construction related traffic effects. However, this is not expected to have a detrimental effect on the operations of businesses in the Local Area due to the below reasoning.</p> <p><b>Chapter 5: Traffic and Transport (Volume 1)</b> identifies very few significant effects related to traffic and transport in the Construction Phase. The significant negative effects on traffic in the Local Area during construction are limited to:</p>



Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
		<ul style="list-style-type: none"> <li>Wootton – NMU amenity, increase in HGVs; and</li> <li>Woburn Road – NMU amenity, increase in HGVs.</li> </ul> <p>The chapter states that there is unlikely to be pedestrians on the link between Wootton and Woburn Road, and therefore it should not impact any pedestrians accessing the businesses in the area. The access to the Sainsbury's Local on Folkes Road should be unaffected.</p> <p>While Manor Road may be closed off to through traffic at times during the Peak Construction Year in a worst case scenario, there is an expectation that Network Rail will be constructing a new bridge to replace the existing level crossing during this period, as a cautious worst case. As such, general traffic between Wixams and Wootton during the construction of this bridge has to use alternative routes.</p> <p><b>Chapter 9: Noise and Vibration (Volume 1)</b> determines there will be very receptors significantly affected by noise and vibration in the Construction Phase during the day time where office workers are likely to be working. Where significant noise effects do occur, they are located at receptors where noise concern would have less impact (for instance, NSR05 is located near to D&amp;G Nobel in Wootton, and industrial and logistics company).</p> <p><u>Conclusion</u></p> <p>Given that significant noise impacts are not expected to affect businesses that rely on quiet working environments, and that vehicle access for businesses will be maintained throughout construction, the potential for disruption to local businesses is considered limited. The primary adverse effect relates to increased traffic during construction. As such, the overall magnitude of disruption for businesses in the Local Area is assessed to be low.</p> <p>The sensitivity of businesses across the Local Area is high. The magnitude of impact is negligible. This results in a direct, temporary, <b>Minor Adverse Residual Effect (Not Significant)</b> from 2026 to 2031.</p>
	<b>Additional Mitigation</b>	N/A
	<b>Residual Effects</b>	<p>As there is no additional mitigation the residual effects are the same as the potential effects outlined above. This is repeated below for clarity.</p> <p>The sensitivity of businesses across the Local Area is high. The magnitude of impact is low. This results in a <b>Direct, Temporary, Medium Term Minor Adverse Residual Effect (Not Significant)</b> from 2026 to 2031.</p>
<b>Emergency services</b>		
Service providers (CSA, SRCA)	<b>Potential Effects</b>	<p><u>Access for emergency services</u></p> <p>Throughout the construction period access for emergency vehicles will be maintained to and around the Site. Any closure to any such routes shall be controlled and managed to maintain access and suitable through routes for emergency vehicles at all times. These mitigation measures are secured in <b>ES Appendix 2.3: Outline Construction Environmental Management Plan (OCEMP) (Volume 3)</b>,</p>

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring
	<p><b>ES Chapter 16: Major Accidents and Disasters (Volume 1)</b> outlines measures UDX has committed to with regards to constructing and managing the operations of the proposed Theme Park that would limit the impact on the demand for emergency services.</p> <p><u><i>Demand for emergency services</i></u></p> <p>Any additional workers of any kind could increase demand for emergency services within the CSA and SRCA through injuries and work related illness. There are around 2.6 million working days lost annually in the construction sector across Great Britain due to workplace injury and work-related illness. This is higher than the average across all industries. Specifically, data shows that on average 2.6% of the construction workforce per year suffer injuries per year at work, compared to 1.5% across all industries. This means that, at peak, 140 injuries might arise during the third year of construction. This evidence-based estimate differs from that of East of England Ambulance Service NHS Trust (EEAST), who reported a potential injury figure of 304 in a letter to UDX during the peak. 304 annual incidents equates to approximately 25 incidents per month. In March 2024 Bedfordshire Hospitals NHS Foundation Trust had 25,400 monthly attendances. Bedfordshire Hospitals NHS Foundation Trust includes Bedford Hospital and Luton and Dunstable University Hospital, covering an area more relevant to Site.<sup>8</sup> Even in line with the EEAST incident figures and covering a smaller impact area than is covered by EEAST, the impact of construction incidents at the proposed Theme Park in the year of peak construction would only represent approximately 0.1% of current monthly accident and emergency attendance. The impact on accident and emergency services across the area serviced by EEAST will be even more minimal.</p> <p>All workers will be required to adhere to the Worker Code of Conduct detailed in <b>Appendix 2.3: Outline Construction Environmental Management Plan (OCEMP) (Volume 3)</b>, which details the behavioural standards expected of them, as well as of all workers for contractors throughout the supply chain. It will be the responsibility of the Principal Contractor(s) to make sure its workers adhere to the code of conduct. This will be made clear in the tender process by UDX for the Principal Contractor (s). The code contains enforcement provisions designed to ensure that the entire workforce have no impact on the local community in terms of antisocial behaviour, vandalism, property destruction or other types of social crime. This embedded mitigation is expected to limit any pressures on policing to minimal.</p> <p>Fires on major construction projects in the UK are extremely rare due to stringent safety regulations and protocols enforced in the UK, including those outlined by the Health and Safety Executive (HSE) and building regulations that emphasize fire safety (<b>Ref. 13.78</b>). UDX will ensure the Principal Contractor(s) implements best practice measures in order to prevent major fire related accidents.</p>

<sup>8</sup> This is a much smaller area than is covered by EEAST, which comprises Bedfordshire, Cambridgeshire, Hertfordshire, Essex, Suffolk, and Norfolk. EEAST responded to the consultation, expressing concern about increased demand and providing their own estimates. Their estimates were higher, but no basis for them was given. EEAST covers a wider geographical area and so the assessment presented here is more conservative as set against a smaller baseline.

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
		<p><u>Conclusion</u></p> <p>Following mitigation, there is expected to be a very minimal increase in demand for emergency services relative to the existing provision, and access for emergency services will be retained throughout, leading to no noticeable or adverse impacts upon access. As such, the impact on service providers is judged to be of <b>low magnitude across both the CSA and SRCA</b>.</p> <p>The sensitivity of service providers across the CSA and SRCA is low. The magnitude of impact is medium. <b>This results in an Indirect/Direct, Temporary, Minor Adverse Effect (Not Significant)</b> from 2026 to 2031.</p>
	Additional Mitigation	<p>In the Construction Phase, UDX will ensure that the Principal Contractor(s) will implement initial first aid treatment support services designed to provide timely response to a variety of commonly seen urgent/emergent injuries and illnesses presented by team members and contractors. Initial treatment will include basic first aid up to and including the application of basic life support. Basic life support means non-invasive emergency procedures applied to assist in the immediate survival of the patient including cardiopulmonary resuscitation (CPR), application of an automatic external defibrillator (AED), bleeding control, fracture stabilisation, and spinal immobilisation. Patients will be referred to definitive health care when:</p> <ul style="list-style-type: none"> <li>■ A life threatening medical emergency is present or presented.</li> <li>■ The injury or illness episode cannot be fully assessed or treated within the scope of first-aid;</li> <li>■ The illness presents a health risk to others (i.e. communicable disease other than flu/cold);</li> <li>■ The condition is chronic or needs ongoing regular health care; and</li> <li>■ Where required under public health law, NHS standard of care or when requested by the injured or ill party.</li> </ul> <p>UDX will further ensure that the Principal Contractor(s) will provide first aid support for workers, including basic life support such as CPR, AED use, bleeding control, and fracture stabilisation. Serious cases, including life-threatening emergencies or illnesses requiring ongoing care, will be referred to healthcare providers. The Principal Contractor(s) will collaborate with local health services and emergency responders to ensure efficient incident response, sharing protocols and offering joint training and onsite drills. Emergency vehicle access will be maintained at all times, with key routes managed to ensure they remain open and accessible during construction.</p> <p>UDX will liaise with the local health care system providers to validate shared understanding of available resources and support opportunities, share knowledge of operations and protocols for occupational incidents and return to work availabilities, and patient communications and information. The Principal Contractor(s) will also liaise with emergency responders related to site response locations, protocols, operational risks, and site familiarity to facilitate efficient and effective incident response. The Principal Contractor(s) will communicate and gain mutual understanding of onsite rescue/response resources and identification of agency support and equipment needs. UDX will offer and provide onsite emergency drills and training opportunities for responder agencies.</p>

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
		Throughout the construction period access for emergency vehicles will be maintained to and around the Site. Any closure to any such routes shall be controlled and managed to maintain access and suitable through routes for emergency vehicles at all times. These mitigation measures are detailed in <b>ES Appendix 2.3 – Outline Construction Environmental Management Plan (Volume 3)</b> and it is envisaged that this will be secured by a planning condition.
	<b>Residual Effects</b>	Following mitigation, there is expected to be a very minimal increase in demand for emergency services relative to the existing provision, and access for emergency services will be retained throughout, leading to no noticeable or adverse impacts upon access. As such, the impact on service providers is judged to be of <b>negligible magnitude across both the CSA and SRCA</b> .  The sensitivity of service providers across the CSA and SRCA is medium. The magnitude of impact is negligible. <b>This results in an Indirect/Direct, Temporary, Medium Term, Minor/Negligible Adverse Residual Effect (Not Significant)</b> from 2026 to 2031.

## OPERATIONAL PHASE

**Table 13-48 – Assessment of potential effects, additional mitigation, residual effects and monitoring during operation**

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
Trade creation		
Businesses (National)	Potential Effects	<p>The Entertainment Resort Complex will be a tourist attraction unlike any that currently exists in the UK.</p> <p><u>Data provided by UDX</u></p> <p>Total visitor numbers to the Theme Park are anticipated to be 8.5 million in 2031 and 12 million in 2051.<sup>9</sup> These estimates have been provided by UDX based on their similar sized operations elsewhere. This annual visitor figure is approximately three to five times higher than the next largest theme park in the UK, highlighting the fact that it is in no way a direct comparator to the existing UK provision.</p> <p><u>Data benchmarked against industry leading report</u></p> <p>Volterra has verified these numbers via two routes – firstly by comparison to the AECOM Theme Index for global attractions and secondly by applying penetration rates to available visitor catchment.</p> <p>The pandemic had a significant impact upon theme park attendance in 2020 and 2021. For this reason, these years have been removed from the analysis. Volterra has reviewed the AECOM Theme Index for the last five years excluding</p>

<sup>9</sup> We note that the Transport Assessment assumes 12.5 million visitors in 2051. This is a conservative estimate for the purposes of that report.

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring
	<p>pandemic-impacted numbers (2017, 2018, 2019, 2022 and 2023). Universal operated 4-5 parks within the top 25 during each of these years, which attracted the following ranges of attendees (<b>Ref. 13.25</b>).</p> <ul style="list-style-type: none"> <li>▪ 9m – 16m (2023);</li> <li>▪ 8.4m – 12.4m (2022);</li> <li>▪ 9.1m – 14.5m (2019);</li> <li>▪ 9.1m – 14.3m (2018); and</li> <li>▪ 9.1m – 14.9m (2017).</li> </ul> <p>Of the top 25 global theme parks Disneyland Paris is the most comparable in terms of scale and geographical location. Over this period, it attracted a fairly steady attendance ranging from 9.7m (in 2017) to 9.9m (in 2022). It is judged from this that an attendance of between 8.5m and 12m is a reasonable estimate for the Theme Park.</p> <p><u>Data further verified by Volterra primary research</u></p> <p>Volterra has estimated likely attendance based on applying penetration rates to different visitor catchments. Potential visitors are split into the following different visitor catchments: residents within 1hr (primary residents), residents within 1-2hrs (secondary residents), domestic tourists and international tourists. A penetration rate is the proportion from each group that would attend the theme park in one year. The penetration rates are sourced from LDP (<b>Ref. 13.70</b>) who collated them based on their industry experience. This method results in estimates of 7.1m attendees in 2031 and 11.6m in 2051.<sup>10</sup></p> <p>The anticipated attendance numbers (8.5m in 2031 and 12m in 2051) are therefore within the ranges identified via the benchmarking and verification exercises and are thus concluded to be robust.</p> <p>The anticipated attendance would place the Proposed Development in the top tier of global theme parks, delivering a destination resort unlike anything the UK currently has.</p> <p><u>Evidence of additionality</u></p> <p>The trade created through the Theme Park is expected to be largely additional at the National Area for several key reasons.</p> <ul style="list-style-type: none"> <li>▪ The baseline found that the theme park sector is a growing sector: This provides evidence that the new provision will not have a material impact on economic activity elsewhere in the sector and displacement is likely to be fairly low;</li> <li>▪ The UK's theme park offering has not fundamentally changed for a long time: as shown in the baseline, LEGOLAND Windsor is the most visited theme park in the UK. It was also the most recent addition, and it opened in 1996. Merlin has continued to invest in and improve its theme parks over the years, adding new attractions and visitor accommodation to its existing parks but no new parks have been built. Despite significant investment planned to re-energise many existing entertainment facilities across the country, there is</li> </ul>

<sup>10</sup> Given the uncertainty of projecting forward to 2051, a scenario is also tested with no growth from 2031 to 2051, which results in estimated visitors in 2051 reducing to 10.9m which still falls within the ranges reported from other methods.

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
		<p>no other major global theme park planned and there has not been a new major theme park for decades, despite the significant growth in the general population as well as their propensity for leisure and the theme park sector;</p> <ul style="list-style-type: none"> <li>Consumer confidence and leisure spending has been rising. The leisure travel industry performed well in 2023 as consumers prioritise travel and the experiential over other leisure goods; and</li> <li>The resident population of, and tourism arrivals to, the UK are both growing, which are the primary markets for theme park attendance.</li> </ul> <p>A look at comparable launches shows that new, large-scale parks expand, rather than cannibalise, the visitor pool. When LEGOLAND Windsor opened, its first full season drew 1.47 million guests, yet Alton Towers remained stable at approximately 2.89 million and Thorpe Park held around 0.94 million; together, the three parks were hosting over one million more visits than in 1995, proving net market growth rather than substitution (<b>Ref 13.92, 13.93 and 13.94</b>).</p> <p>The narrative in this section has demonstrated that there is (i) significant growth in and demand for theme parks globally as well as tourism and entertainment in the UK specifically, and (ii) likely to be very little trade diversion from existing theme parks. The Theme Park is therefore expected to result in overall market growth and ultimately help to grow the UK's share of the global theme park market, benefitting all theme park operators.</p> <p><u>Conclusion</u></p> <p>The magnitude of impact felt nationally, through creating a new global calibre entertainment resort is expected to be of high magnitude.</p> <p>This combines with a high sensitivity receptor to result in a <b>Direct, Permanent, Long Term Effect That Is Major Beneficial (Significant) at the National Area across both 2031 and 2051.</b></p>
	<b>Additional Mitigation</b>	None.
	<b>Residual Effects</b>	<p>As there is no additional mitigation the residual effects are the same as the potential effects outlined above. This conclusion is repeated below for clarity:</p> <p>The magnitude of impact felt nationally, through creating a new global calibre entertainment resort is expected to be of high magnitude.</p> <p>This combines with a high sensitivity receptor to result in a <b>Direct, Permanent, Long Term Residual Effect That Is Major Beneficial (Significant) at the National Area across both 2031 and 2051.</b></p>
<b>Economic output</b>		
Businesses (National)	<b>Potential Effects</b>	<p>The net direct employment is converted into GVA using GVA per worker in tourism related sectors in the relevant geographies (<b>Ref. 13.9, 13.80</b>).<sup>11</sup> The indirect and worker induced employment is converted into GVA using average GVA per worker in the relevant geographies.</p>

<sup>11</sup> GVA per worker in a sector is calculated by dividing ONS reported GVA figures by ONS reported employment figures in the relevant sector



Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring																																																		
	<p>The visitor induced employment, given it will predominantly be felt in tourism related sectors, is converted using GVA per worker in tourism related sectors in the relevant geographies. This results in total net additional GVA at the CSA level of £450m in 2031, rising to £1.3bn in net additional GVA generated in 2031 at the National Area. This rises to £680m and £2.1bn by 2051.</p> <p><b>Table 13-49 – Net additional GVA across various geographies, 2031</b></p> <table><tr><th></th><th>CSA</th><th>SRCA</th><th>LCA</th><th>National</th></tr><tr><td>Net direct</td><td>£300m</td><td>£385m</td><td>£295m</td><td>£260m</td></tr><tr><td>Indirect and worker induced</td><td>£45m</td><td>£75m</td><td>£220m</td><td>£505m</td></tr><tr><td>Net visitor induced</td><td>£105m</td><td>£175m</td><td>£230m</td><td>£515m</td></tr><tr><td>Total net additional</td><td>£450m</td><td>£640m</td><td>£745m</td><td>£1.3bn</td></tr></table> <p>Source: ONS, 2024. Gross Value Added 2022; Volterra modelling</p> <p><b>Table 13-50 – Net additional GVA across various geographies, 2051</b></p> <table><tr><th></th><th>CSA</th><th>SRCA</th><th>LCA</th><th>National</th></tr><tr><td>Net direct</td><td>£465m</td><td>£600m</td><td>£460m</td><td>£405m</td></tr><tr><td>Indirect and worker induced</td><td>£70m</td><td>£115m</td><td>£345m</td><td>£780m</td></tr><tr><td>Net visitor induced</td><td>£145m</td><td>£260m</td><td>£355m</td><td>£950m</td></tr><tr><td>Total net additional</td><td>£680m</td><td>£975m</td><td>£1.2bn</td><td>£2.1bn</td></tr></table> <p>ONS, 2024. Gross Value Added 2022; Volterra modelling</p> <p>The total net additional GVA at the National Area of £1.3bn in 2031 is equivalent to 0.7% of the existing GVA across accommodation, retail, arts, entertainment and recreation sectors in England as report in <b>Table 13-31</b>. This rises to 1.2% for the £2.1bn GVA supported in 2051.</p> <p>As discussed in <b>Paragraph 13.4.81</b>, DCMS find that UK tourism economy is worth £74.5bn. The output provided through the Theme Park in 2031 would therefore constitute a 1.7% increase on this value through its net additional economic output. The Full Buildout would contribute to a 2.9% increase on this value in 2051. This would be a boost on the scale of no other project in the pipeline for tourism across the country.</p>		CSA	SRCA	LCA	National	Net direct	£300m	£385m	£295m	£260m	Indirect and worker induced	£45m	£75m	£220m	£505m	Net visitor induced	£105m	£175m	£230m	£515m	Total net additional	£450m	£640m	£745m	£1.3bn		CSA	SRCA	LCA	National	Net direct	£465m	£600m	£460m	£405m	Indirect and worker induced	£70m	£115m	£345m	£780m	Net visitor induced	£145m	£260m	£355m	£950m	Total net additional	£680m	£975m	£1.2bn	£2.1bn
	CSA	SRCA	LCA	National																																															
Net direct	£300m	£385m	£295m	£260m																																															
Indirect and worker induced	£45m	£75m	£220m	£505m																																															
Net visitor induced	£105m	£175m	£230m	£515m																																															
Total net additional	£450m	£640m	£745m	£1.3bn																																															
	CSA	SRCA	LCA	National																																															
Net direct	£465m	£600m	£460m	£405m																																															
Indirect and worker induced	£70m	£115m	£345m	£780m																																															
Net visitor induced	£145m	£260m	£355m	£950m																																															
Total net additional	£680m	£975m	£1.2bn	£2.1bn																																															



Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
		<p><u>Conclusion</u></p> <p>The magnitude of impact felt nationally, through the creation of additional economic output, is expected to be of medium magnitude.</p> <p>This combines with a medium sensitivity receptor to result in a <b>Direct/Indirect, Permanent, Long Term Effect That Is Moderate Beneficial (Significant) at the National Area across both 2031 and 2051.</b></p>
	Additional Mitigation	None.
	Residual Effects	<p>As there is no additional mitigation the residual effects are the same as the potential effects outlined above. This conclusion is repeated below for clarity.</p> <p>The magnitude of impact felt nationally, through the creation of additional economic output, is expected to be of medium magnitude.</p> <p>This combines with a medium sensitivity receptor to result in a <b>Direct/Indirect, Permanent, Long Term Effect That Is Moderate Beneficial (Significant) at the National Area across both 2031 and 2051.</b></p>
Additional spending		
Businesses (CSA, SRCA)	Potential Effects	<p>In order to estimate the additional visitor spending that guests to the Proposed Development would generate, it is important to understand the following factors:</p> <ul style="list-style-type: none"> <li>▪ Different types of visitors;</li> <li>▪ Likelihood of visitors' staying overnight;</li> <li>▪ Length of trip (both in total and at the Entertainment Resort Complex);</li> <li>▪ Spend per night of trip;</li> <li>▪ Distribution of expenditure between accommodation and other;</li> <li>▪ Motivation of trip (the extent it can be attributed to the Proposed Development); and</li> <li>▪ Geographical location of induced activity.</li> </ul> <p>The following sections describe the basis for assumptions around the above factors which are then used to produce an estimate of visitor expenditure.</p> <p><u>Visitor types</u></p> <p>As detailed previously in the effects section covering <b>trade creation</b>, visitor numbers are anticipated to be 8.5 million in 2031 and 12 million in 2051 at the Full Buildout. As well as spending time and money at the Proposed Development, visitors will also spend time and money elsewhere during their trip. For the purposes of estimating visitor expenditure, visitors are disaggregated into day trippers and overnight visitors, across the previously described visitor catchment types (primary residents, secondary residents, domestic tourists and international tourists). The largest contributor to expenditure is international tourists. As detailed in <b>Appendix 2.1: Environmental Statement Basis of Assessment (Volume 3)</b>, 30% of the 8.5m visitors in 2031 are expected to be international guests, rising to 48% of the 12m visitors in 2051.</p>

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring
	<p><u><i>Likelihood of staying overnight</i></u></p> <p>There are no available data sources which reliably report the likelihood of visitors from different catchments to stay overnight. For the purposes of assessment, none of the primary residents are assumed to stay overnight and all of the international tourists are assumed to stay overnight. 25% of secondary residents and 75% of domestic tourists are assumed to stay overnight. The sensitivity of the analysis to these assumptions is explained where relevant.</p> <p><u><i>Average length of trip and spend per night</i></u></p> <p>UDX has provided an average theme park trip length of 1.5 days for overnight visitors to inform the basis of assessment. This is used to convert day visitor numbers to individual visitors for the purposes of their trips and associated expenditure. Respected sources are available for understanding average expenditure for different types of visitors within the UK. These are detailed below.</p> <ul style="list-style-type: none"> <li>• Domestic day visits within England (<b>Ref. 13.72</b>) – Visit Britain reported that in 2023 there were 371 million tourism day visitors in England contributing a total spend of £15.6 billion. This gives an average spend per tourism day visitor of £42. This daily expenditure is used for secondary residents and domestic tourists making day trips.</li> <li>• Domestic overnight trips in England (<b>Ref. 13.73</b>) – Visit Britain reported that in 2023 there were 99.2 million domestic overnight tourism trips in England contributing a total spend of £25.7 billion. The source reports that the average number of nights per trip for this group was 2.8, and the average spend per night was £92. This length of stay and spend per night is used for secondary residents and domestic tourists making overnight trips.</li> <li>• International visitors (<b>Ref. 13.31</b>) – Visit Britain reports statistics from the International Passenger Survey for international visitors. These show that international tourists on holiday to the UK stay an average of 6.1 nights per trip and spend an average £153 per night. This length of stay and spend per night is used for international tourists.</li> </ul> <p><b>Split of expenditure between accommodation and other items</b></p> <p>The sources detailed above do not disaggregate spending by overnight accommodation and other items. Barclaycard's tourism report provides this information which demonstrates that on average international and domestic visitors spend 19% and 32% of their expenditure respectively on accommodation (<b>Ref. 13.33</b>). This is used to disaggregate expenditure into two categories: expenditure on accommodation, and all other types of visitor expenditure.</p> <p><b>Motivation of trip</b></p> <p>Disneyland Paris reported the below trip motivations for different visitor groups. UDX has also provided their own information which finds that 40% of international guests' trips are primarily driven by Universal. Given the alignment of Universal's own information with the overseas trip purpose from Disneyland Paris, the more detailed insight into trip purpose available from Disneyland Paris is used for tourist groups. The 'local area' trip motivations are applied to primary residents, 'domestic tourist' is applied to secondary residents and domestic tourists, and 'overseas' is applied to international tourists.</p>

**Table 13-51 – Disneyland Paris trip purpose breakdown by visitor group**

Trip Purpose	Local area	Domestic tourist	Overseas
Theme park sole motivation	99%	77%	41%
Linked trip with Paris	1%	17%	34%
Linked trip other	0%	6%	25%

Source: DisneyLand Paris, 2012. Economic and Social Impact Study

In terms of additionality, where the theme park was the primary motivation for the trip, the visitors' expenditure during their entire trip is assumed to be additional and is claimed as a benefit resulting from the delivery of the Proposed Development. Where the trip is linked with another destination, only half of the visitors' expenditure during their trip is assumed to be additional and resulting from the delivery of the Proposed Development. In both instances, expenditure on-Site is excluded and only expenditure off-Site, which could accrue to other businesses, is estimated here.

#### Estimated visitor expenditure

These assumptions are used to build a model which estimates visitor expenditure off-Site. This results in estimates of gross expenditure by theme park visitors of £1.7bn in 2031 and £3.2bn in 2051. This expenditure excludes any spending on-Site, which is assumed to be captured by the theme park and supports the activity generated on-Site and only estimates the expenditure generated off-Site which would support activity at other businesses. Of this total spending, an estimated £1.3bn (2031) and £2.3bn (2051) is additional as a result of the Proposed Development. The total amount of expenditure rises between 2031 and 2051, but the proportion of this which accrues outside of the resort reduces as a result of the increased provision of visitor accommodation on-Site which would capture some of the activity. This is why the 2051 net additional expenditure estimate is similar in magnitude to the 2031 estimate. The distribution of spending by visitor type of show below. As the table shows, the vast majority (76-88%) of the expenditure is generated by international guests.

**Table 13-52 – Visitor expenditure by visitor type**

Trip type	2031	2051
Primary residents – all day trippers	£5.0m	£5.5m
Secondary residents – day trippers	£105m	£110m
Secondary residents – overnight visitors	£85m	£80m
Domestic tourists – day trippers	£25m	£25m
Domestic tourists – overnight visitors	£175m	£150m
International tourists – all overnight visitors	£1.3bn	£2.8bn
Total gross expenditure	£1.7bn	£3.2bn

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring																	
		<table><tr><td>(of which international)</td><td>76%</td><td>88%</td></tr><tr><td>Total additional expenditure</td><td>£1.3bn</td><td>£2.3bn</td></tr><tr><td>(of which international)</td><td>71%</td><td>85%</td></tr></table>	(of which international)	76%	88%	Total additional expenditure	£1.3bn	£2.3bn	(of which international)	71%	85%							
(of which international)	76%	88%																
Total additional expenditure	£1.3bn	£2.3bn																
(of which international)	71%	85%																
	<p><u>Location of expenditure</u></p> <p>Given the unique nature of the resort, no industry sources are available for understanding the preferences for where visitors would choose to stay. We have made the following assumptions:</p> <ul style="list-style-type: none"><li>On-Site visitor accommodation is taken proportionally in line with overnight demand from secondary resident, domestic and international visitors.</li><li>For the remainder of the visitor accommodation demand, which is off-Site:<ul style="list-style-type: none"><li>Secondary residents overnight visitors will all want to stay within the CSA or SRCA. This is because if they live within a 2hr travel from the Site, it is assumed that they would only make the decision to stay overnight if they could do so very near to the Site.</li><li>Domestic tourist overnight visitors: 40% CSA, 60% SRCA and 75% LCA (with each being inclusive of the smaller study area), with the remaining 25% further afield. As domestic tourists will be travelling from elsewhere in the country, they are expected to have more local preferences than international tourists but less local than secondary residents.</li><li>Given the longer length of trip of international visitors and increased likelihood of them linking their trip with another destination, the following assumptions are made: 10% CSA, 20% SRCA, 30% LCA, remaining 70% further afield (mostly London).</li></ul></li></ul> <p>These assumptions result in the following distribution of visitor expenditure. Only net expenditure is presented, as this is what the effect conclusion is based upon.</p> <p><b>Table 13-53 – Net visitor expenditure by study area<sup>12</sup></b></p> <table><tr><th>Study area</th><th>2031</th><th>2051</th></tr><tr><td>CSA</td><td>£255m</td><td>£350m</td></tr><tr><td>SRCA</td><td>£430m</td><td>£635m</td></tr><tr><td>LCA</td><td>£560m</td><td>£865m</td></tr><tr><td>National</td><td>£1.3bn</td><td>£2.3bn</td></tr></table>			Study area	2031	2051	CSA	£255m	£350m	SRCA	£430m	£635m	LCA	£560m	£865m	National	£1.3bn	£2.3bn
Study area	2031	2051																
CSA	£255m	£350m																
SRCA	£430m	£635m																
LCA	£560m	£865m																
National	£1.3bn	£2.3bn																

<sup>12</sup> Each larger geography is inclusive of smaller areas.

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring															
	<p>The impacts upon demand for visitor accommodation is assessed separately, and the receptor for this effect is baseline retail and leisure expenditure within the CSA. Therefore, the table below disaggregates this further to only focus on expenditure outside of visitor accommodation. Again, only net expenditure is reported.</p> <p><b>Table 13-54 – Net visitor expenditure, excluding visitor accommodation, by study area</b></p> <table><tr><th>Study area</th><th>2031</th><th>2051</th></tr><tr><td>CSA</td><td>£175m</td><td>£265m</td></tr><tr><td>SRCA</td><td>£305m</td><td>£485m</td></tr><tr><td>LCA</td><td>£400m</td><td>£665m</td></tr><tr><td>National</td><td>£930m</td><td>£1.8bn</td></tr></table> <p>This level of visitor expenditure in the CSA is equivalent to 4.4% and 4.2% of the 2031 and 2051 future baseline values, and for the SRCA it is equivalent to 2.9% and 2.4%.</p> <p><u>Diversion of trade</u></p> <p>Primary residents (residents within a one hour commute of the Theme Park) are expected to spend £71m on-Site in the opening year. As a cautious worst case scenario, if it was assumed that all of this spend may otherwise have gone to locations in Bedford and Central Bedfordshire town centres, and future baseline spending in these town centres was otherwise unchanged, this would equate to a reduction of 1.8% in town centre spending. This assumption is unrealistic and very conservative, given that the one-hour catchment for primary residents extends beyond these local authorities. Furthermore, total expected spend in Bedford and Central Bedfordshire (from all types of visitors) is expected to reach almost £175m in the opening year, over twice as much as the spending by primary residents on-Site. The numbers are very similar in magnitude in 2051 but set against a larger future baseline of expenditure in the CSA and so the relative impact would be lower. This would also be the case for the SRCA. This shows that even in the cautious worst case scenario, businesses in the CSA can expect to benefit from the additional spending associated with the proposed Theme Park, even if there may exist some trade diversion for primary residents, as this will be more than offset by expenditure in the area from new visitors.</p> <p><u>Conclusion</u></p> <p>Overall, the impact on additional spending across the CSA is expected to be of high magnitude in 2031 and 2051. The impact at the SRCA level is judged to be of medium magnitude in both assessment years.</p> <p>The visitors attracted to the Proposed Development would provide a new source of expenditure for local businesses, increasing existing retail turnover by 4.4% in the CSA compared to the 2031 baseline and 2.9% in the SRCA after excluding spend on visitor accommodation. This uplift drops to 4.2% and 2.4% for the CSA and SRCA in the 2051 baseline turnover. This additional spending is far greater than any potential trade diversion effects.</p> <p>Combining with a medium sensitivity receptor, this results in an <b>Indirect, Permanent, Long Term Moderate/Major Effect (Significant) in at the CSA in</b></p>	Study area	2031	2051	CSA	£175m	£265m	SRCA	£305m	£485m	LCA	£400m	£665m	National	£930m	£1.8bn
Study area	2031	2051														
CSA	£175m	£265m														
SRCA	£305m	£485m														
LCA	£400m	£665m														
National	£930m	£1.8bn														

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
		<b>2031 and 2051, and an indirect, permanent, long term, moderate effect (significant) in the SRCA in 2031 and 2051.</b>
	<b>Additional Mitigation</b>	None.
	<b>Residual Effects</b>	<p>As there is no additional mitigation the residual effects are the same as the potential effects outlined above. This conclusion is repeated below for clarity.</p> <p><b>An indirect, permanent, long term moderate/major beneficial residual effect (significant) in at the CSA in 2031 and 2051.</b></p> <p><b>And an Indirect, Permanent, Long Term, Moderate Beneficial Effect (Significant) in the SRCA in 2031 and 2051.</b></p>
Employment		
Residents (CSA, SRCA, LCA, National)	<b>Potential Effects</b>	<p><u><i>Direct employment on-Site</i></u></p> <p>Estimates of direct employment have been provided by UDX based on their considerable experience of operating theme parks worldwide. It is estimated that the Theme Park will directly support 8,050 people in 2031 (equivalent to 5,950 FTEs) in the year of opening (2031). The Full Buildout Phase of the Proposed Development is expected to support employment of 12,465 people (9,195 FTEs) by the year of maturity (2051). Specifically, the employment supported at the Full Buildout Phase consists of the following:</p> <ul style="list-style-type: none"> <li>■ 10,000 jobs (7,395 FTEs) on the Theme Park;</li> <li>■ 2,415 jobs (1,765 FTEs) across the visitor accommodation (excluding the jobs at the 500 visitor accommodation rooms provided by 2031); and</li> <li>■ 50 jobs (35 FTEs) supported at the convention centre (there would be more temporary employment opportunities when large events are held, however these are excluded from this assessment in order to assess a cautious worst case scenario of employment).</li> </ul> <p>Job estimates have been verified by Volterra based on international and European theme park benchmarks of attendees per employee. Visitor accommodation and convention jobs have been verified by Volterra based on HCA guidance around hotel bedrooms per job and floorspace density metrics (<b>Ref. 13.71</b>).</p> <p>The jobs provided in both assessment years will include full-time and part-time jobs, including roles in entertainment, park and resort operations, technical services, revenue operations, resort development and entertainment and visitor accommodation. Further detail on the types and ranges of direct jobs can be found in <b>Employment and Skills Plan (Document Reference 6.12.0)</b>.</p> <p><u><i>Net additional employment – model assumptions</i></u></p> <p>Further jobs will be supported indirectly through the supply chain and induced as a result of worker and visitor expenditure. The key factors relevant here are: displacement, standard composite multiplier and visitor expenditure induced activity.</p> <p><b>Displacement</b> is the proportion of jobs that will otherwise have been supported elsewhere. The Additionality Guide (<b>Ref. 13.68</b>) notes that ‘displacement arises where the intervention takes market share... from existing local firms or</p>



Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring
	<p>organisations'. The guidance advises that as there are likely to be a greater number of enterprises providing the same product or service at a larger geographical area then displacement at a larger area is likely to be greater than at a smaller area. Most schemes are not assessed at the National Area as displacement will be very high once considered at this geographical level. However, in a scheme of this kind where by its very nature there are no other direct comparators within the UK, it is reasonable to assume that displacement will be significantly lower than other schemes.</p> <p>In order to estimate likely displacement in an evidence-based manner, it is important to consider market share, alternative options and market growth across different geographies.</p> <p>The baseline shows that attendance in 2023 at many of the top attractions, including those operated by UDX, had almost fully recovered from the pandemic. The future baseline reports expected growth in theme park attendance as the industry continues to recover from the impacts of the pandemic. The report also forecasts consumer spending will rise, population will grow, and desire to spend on leisure and experiences is increasing. Prior to the pandemic, AECOM reported that the attendance at themed attractions had grown from capturing 5% to 7% of the global population. The future baseline further indicates that the national and global populations are expected to grow (refer to Paragraph <b>13.4.78</b>). By 2031, the UK population is expected to reach 72.2m, and the global population is expected to above 8.5bn.</p> <p>With no theme parks of this calibre present here, the UK is currently unable to capture any of this growth in the market. Adding a destination attraction of this nature in the UK is deemed to be nationally significant and it is therefore likely that it will capture future growth in the market, rather than cannibalising existing activity. A project of this scale will realise the growth in the theme park and other linked markets that will not otherwise be met in the UK. On the basis of these trends and evidence base, it is therefore judged that the Proposed Development will likely result in much lower displacement than other developments.</p> <p>As well as displacement from like for like destinations, it is important to consider the extent to which market share is captured from alternative options. For example, if one family has a certain budget to spend on holidays or leisure activities, their attendance at a theme park will be instead of an alternative use of their leisure pound. In the context of a destination attraction like the Proposed Development, this could of course be capturing holidays that will otherwise have occurred outside of the UK (the most obvious alternative might be Disneyland Paris or a weekend city break elsewhere), which will not result in any displacement at the UK level. It is likely however that some proportion of the visits and expenditure to the Proposed Development will be made instead of visits and expenditure to other UK tourist destinations. The larger the geographical area, the more likely this becomes as the greater the options available for the same leisure pound.</p> <p>In Volterra's professional opinion, displacement is likely to be low at the National Area (because whilst there is no direct competitor, there are some alternative tourism destinations which activity could be displaced from) and even lower at more local levels (because there is very low competition for market share). Given this, the following displacement factors are applied:</p> <ul style="list-style-type: none"> <li>■ 5% at the CSA level, increasing to 25% at the National Area (reflecting low displacement as reported in the HCA Additionality Guide). For geographical levels between these (the SRCA and LCA) the displacement grows between</li> </ul>



Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring
	<p>the two levels as the area gets larger (10% and 15% are used at the two intermediate geographies reflecting their relative sizes).</p> <p>A <b>standard composite multiplier</b> captures indirect and worker-induced impacts resulting from the direct creation of new economic activity. The scale of impacts induced by worker expenditure depends on the incomes of the workers relative to the average and the extent of supply chain linkages depends on the extent of supply chain to service the activity.</p> <p>Just as displacement typically rises the larger the geographical area, so too does the multiplier. The Additionality Guide notes that ‘the size of the multiplier is likely to be greater the larger the area over which the benefits of an intervention are being assessed’.</p> <p>The guidance provides a series of ‘ready reckoners’ at the neighbourhood and regional geographic levels, depending on whether the development has low, medium or high supply linkages. A development with strong linkages is expected to have a multiplier of 1.15 at the neighbourhood level and 1.7 at the regional level. The neighbourhood effects are contained within the regional effects but provide a helpful way of disaggregating across different geographies. The HCA’s ready reckoners are provided below:</p> <ul style="list-style-type: none"> <li>■ Low: neighbourhood 1.05; regional 1.3;</li> <li>■ Medium: neighbourhood 1.1; regional 1.5; and</li> <li>■ High: neighbourhood 1.15; regional 1.7.</li> </ul> <p>Most developments are not assessed at the National Area, as they are typically smaller in scale. The guidance does not provide composite ready reckoners at the National Area and also does not provide sub-regional ones. According to Visit Britain, a study by Deloitte estimated an economy wide multiplier of 2.2 for tourism. Using the available evidence to cover our four study areas, we apply the following composite multipliers:</p> <ul style="list-style-type: none"> <li>■ Neighbourhood (CSA) 1.1; sub-regional (SRCA) 1.15; regional (LCA) 1.5; national 2.2 (where national is based on the Visit Britain Deloitte study).</li> </ul> <p>These standard composite multipliers take into account the indirect and induced effects described above but do not take into account the induced impacts resulting from visitor expenditure. This is because for most sectors this is not relevant. However, this is clearly a fundamental and potentially very large further impact of tourism.</p> <p>The <b>visitor induced activity</b> supported in addition to this is estimated from the visitor expenditure (<b>Ref. 13.79</b>). The results of this bottom up modelling exercise are then benchmarked top-down against the only available economy wide multiplier for a similar destination – Disneyland Paris. A study found that one job at Disneyland Paris resulted in three jobs elsewhere in France, which equates to an economy wide (including everything) multiplier of 4. Given the similarities with Disneyland Paris in terms of scale, accessibility, location and destination appeal, it is judged that a multiplier of this scale is reasonable.</p> <p><u>Net additional employment – resulting estimates</u></p> <p>Estimates of this net additional activity are provided below, differentiated for 2031 and 2051 assessment years</p>

2031

**Table 13-55 – Net additional employment, 2031**

	CSA	SRCA	LCA	National
Gross direct jobs	8,050	8,050	8,050	8,050
Displacement	5%	10%	15%	25%
Net direct jobs	7,650	7,245	6,845	6,040
Multiplier	1.1	1.15	1.5	2.2
Indirect and worker induced	765	1,085	3,420	7,245
Net Visitor induced	2,635	3,320	5,280	11,910
Total net additional	11,045	11,650	15,545	25,195
Economy wide multiplier	1.4	1.4	1.9	3.1

Related to baseline employment, the Proposed Development would have the following impact in 2031:

- CSA: The 11,045 net additional jobs supported in the CSA constitutes 3.9% of estimated residential employment in the area in 2031, and 5.3% of the workplace based employment;
- SRCA: The 11,650 jobs supported in the SRCA constitutes 2.1% of the estimated residential employment in the area in 2031, and 2.2% of the workplace based employment; and
- LCA and National: Whilst the number of jobs supported in the LCA and National Areas would be much lower as a proportion of total 2031 employment (less than 1%) than in the SRCA and CSA, these jobs would contribute a large percentage of expected annual employment growth in a given year. From 2015 to 2023, employment across England increased by an average of 289,300 each year. The 25,195 jobs constitute 8.7% of this uplift. Given this, it is still judged that the employment created in 2031 would be felt at larger geographical areas.

2051

**Table 13-56 – Net additional employment, 2051**

	CSA	SRCA	LCA	National
Gross direct jobs	12,465	12,465	12,465	12,465
Displacement	5%	10%	15%	25%
Net direct jobs	11,840	11,220	10,595	9,350

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring					
		Multiplier	1.1	1.15	1.5	2.2
		Indirect and worker induced	1,185	1,685	5,295	11,220
		Net Visitor induced	3,660	4,880	8,200	21,920
		Total net additional	16,685	17,780	24,095	42,485
		Economy wide multiplier	1.3	1.4	1.9	3.4
	<p>Related to baseline employment, the Proposed Development would have the following impact in 2031:</p> <ul style="list-style-type: none"><li>- CSA: The 16,685 net additional jobs supported in the CSA constitutes 5.1% of estimated residential employment in the area in 2051, and between 6.9% of the workplace based employment.</li><li>- SRCA: The 17,780 jobs supported in the SRCA constitutes 2.7% of the estimated residential employment in the area in 2051 and 2.9% of the workplace based employment.</li><li>- LCA and National: Whilst the number of jobs supported in the LCA and National Areas would be much lower as a proportion of total 2031 employment (less than 1%) than in the SRCA and CSA, these jobs would contribute a large percentage of expected annual employment growth in a given year. From 2015 to 2023, employment across England increased by an average of 289,300 each year. The 42,485 jobs constitutes 14.7% of this uplift. Given this, it is still judged that the employment created through the Full Buildout in 2051 would be felt at larger geographical areas.</li></ul> <p><u>Summary</u></p> <p>The contribution of the Proposed Development on employment is expected to be of high magnitude to residents in the CSA and SRCA in 2031 and 2051. This combines with a <b>high sensitivity receptor to result in a direct/indirect, permanent, long term, major beneficial effect (significant) at the CSA and SRCA level across both 2031 and 2051.</b></p> <p>The contribution of the Proposed Development on employment is expected to be of medium magnitude to residents in the LCA and National Areas in 2031 and 2051. This combines with a <b>medium sensitivity receptor to result in a Direct/Indirect, Permanent, Long Term Moderate Beneficial Effect (Significant) at the LCA and National Area across both 2031 and 2051.</b></p>					
	Additional Mitigation	None.				
	Residual Effects	As there is no additional mitigation the residual effects are the same as the potential effects outlined above. This conclusion is repeated below for clarity.				

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
		<p>The contribution of the Proposed Development on employment is expected to be of high magnitude to residents in the CSA and SRCA in 2031 and 2051. This combines with a <b>high sensitivity receptor to result in a direct/indirect, permanent, long term, major beneficial residual effect (significant) at the CSA and SRCA level across both 2031 and 2051.</b></p> <p>The contribution of the Proposed Development on employment is expected to be of medium magnitude to residents in the LCA and National Areas in 2031 and 2051. This combines with a <b>medium sensitivity receptor to result in a Direct/Indirect, Permanent, Long Term Moderate Beneficial Residual Effect (Significant) at the LCA and National Area across both 2031 and 2051.</b></p>
Skills and training		
Residents (CSA)	Potential Effects	<p>The 8,050 jobs created in 2031 and the 12,465 jobs in 2051 will support local people through providing new skills and training opportunities.</p> <p><b>Employment and Skills Plan (Document Reference 6.12.0)</b> details the specific skills requirements needed by local residents and how the Theme Park will contribute to local residents. The main skills requirements for residents of the CSA are broken down into three main themes: educational attainment for younger people, facilitating the future workforce with skills in growth sectors, and pathways for those in need.</p> <p>The staff profile in 2031 will contribute to alleviating these outlined needs in the following ways.</p> <ul style="list-style-type: none"> <li>■ A large share of the jobs on offer will have low entry requirements, providing accessible opportunities for those with low/intermediate qualifications. Key for success will be raising awareness amongst locals of the job opportunities on offer at the Proposed Development, especially amongst priority groups such as younger unemployed residents;</li> <li>■ The diversity of jobs on offer will help transform the local economy. Opportunities will be available in distinct and diverse roles, such as finance, entertainment, food and beverage (F&amp;B) roles, and others. Local residents will have a wider selection of jobs to choose from, and a broad range of career paths available for them to build their futures on;</li> <li>■ Significant progression opportunities will be available. It is envisaged that promotion to team leader in areas as diverse as F&amp;B, attractions supervision and security will often be dependent on leadership skills, performance in entry-level roles, and the experience gained there. The lack of degree-level qualifications might not be a barrier; and</li> <li>■ A large proportion of jobs will be in the knowledge economy. The operation and general management of the Entertainment Resort Complex will require the work of diverse professionals, from accountants, IT workers, legal professionals, engineers and marketing specialists. This will help increase productivity and create high-skill clusters across the CSA.</li> </ul> <p><u>Conclusions</u></p> <p>The contribution of the Proposed Development on employment is expected to be of <b>medium magnitude</b> to residents in the CSA in 2031 and 2051 following the implementation of measures included in <b>Employment and Skills Plan (Document Reference 6.12.0)</b>. This combines with a medium sensitivity</p>

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring										
		receptor to result in a <b>Direct, Permanent, Long Term Moderate Beneficial Effect (Significant) in the CSA across both 2031 and 2051.</b>									
	<b>Additional Mitigation</b>	<p>UDX has a long track record of providing such training and skills initiatives, having completed a number of initiatives that work with local schools and provide training from their sites, including in Orlando and Japan. The <b>Employment and Skills Plan (Document Reference 6.12.0)</b> provides initiatives designed to maximise the employment and skills benefits for residents in the CSA (as well as other nearby local authorities). The responsibility of implementing these initiatives will be that of the UDX during the Operational Phase.</p> <p>Specific measures are summarised below:</p> <ul style="list-style-type: none"> <li>■ UDX will commit to providing 55 apprenticeships annually by the second full year of operation, rising to 70 apprenticeships annually from the fifth full year of operation;</li> <li>■ UDX will commit to providing 15 internships annually by the second full year of operation, rising to 35 from the fifth full year of operation;</li> <li>■ By the second full year of operation the Theme Park will provide support for high risk or socio-economically disadvantaged populations. Support will be delivered for 40 eligible students. This could include programming such as Mentorship Programmes, Career Guidance, Job Readiness Upskilling, and other Support for Educational Resources as needed; and</li> <li>■ UDX will commit to working with local organisations that provide opportunities for those with varying abilities. UDX will commit to providing support, training, and accommodations to help local people with varying abilities secure meaningful employment within the Theme Park.</li> </ul> <p>Employment and skills related measures are outlined in <b>Employment and Skills Plan (Document 6.12)</b>, and secured through the <b>Proposed Operative and Controlling Documents (Document Reference 1.16.0)</b>.</p>									
	<b>Residual Effects</b>	The contribution of the Proposed Development on employment is expected to be of <b>high magnitude</b> to residents in the CSA in 2031 and 2051 following the implementation of measures included in <b>Employment and Skills Plan (Document Reference 6.12.0)</b> . This combines with a medium sensitivity receptor to result in a <b>Direct, Permanent, Long Term Moderate/Major Beneficial Effect (Significant) in the CSA across both 2031 and 2051.</b>									
<b>Visitor accommodation</b>											
Businesses (CSA, SRCA)	<b>Potential Effects</b>	<p>The <b>Additional Spending</b> effects section explains the methodology for estimating visitor expenditure. Another output from the same model described is the estimated demand for visitor accommodation across different geographies.</p> <p><b>Table 13-57 – Visitor accommodation rooms demand (in addition to on-Site provision) across the CSA and SRCA</b></p> <table border="1"> <thead> <tr> <th></th><th>2031</th><th>2051</th></tr> </thead> <tbody> <tr> <td>CSA</td><td>2,140</td><td>2,345</td></tr> <tr> <td>SRCA</td><td>3,370</td><td>3,980</td></tr> </tbody> </table>		2031	2051	CSA	2,140	2,345	SRCA	3,370	3,980
	2031	2051									
CSA	2,140	2,345									
SRCA	3,370	3,980									

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
		<p>The Proposed Development will have 500 bedrooms in 2031 and 4,720 for theme park attendees in the Full Buildout Phase in 2051. Volterra's modelling suggests there will be an additional demand in excess of this for a further 2,140 visitor accommodation rooms in the CSA in 2031 and 2,345 in 2051.</p> <p>Widening the area to the SRCA this rises to 3,370 (in 2031) and 3,980 (in 2051) these figures include the demand in the CSA.</p> <p>The extent to which this effect materialises in practice will be dependent upon the planning for the local area and the extent to which such development is permitted. As detailed in <b>Table 13-5</b>, the local authorities are unequivocally in favour of the proposals and intend to plan proactively to maximise benefits. Set in this context it is likely that this future growth could reasonably be delivered.</p> <p>It is again useful to verify these estimates by considering appropriate global benchmarks. By way of comparison, Disneyland Paris has 8 hotels (with 5,700 bedrooms) on-Site and a further 8 partner hotels. Universal Orlando has 11,000 bedrooms in on-Site hotels and yet still has 23 partner hotels. These examples demonstrate that if sufficient accommodation exists, many guests will choose to stay either on-Site or locally.</p> <p><u>Conclusion</u></p> <p>The contribution of the Proposed Development on employment is expected to be of high magnitude to businesses in the CSA in 2031. This combines with a high sensitivity receptor to result in an <b>indirect, permanent, long term major beneficial effect (significant) in the CSA across both 2031 and 2051</b>.</p> <p>The contribution of the Proposed Development on employment is expected to be of high magnitude to businesses in the SRCA in 2031. This combines with a medium sensitivity receptor to result in an <b>indirect, permanent, long term Moderate/Major Beneficial Effect (Significant) in the SRCA across both 2031 and 2051</b>.</p>
	Additional Mitigation	None.
	Residual Effects	<p>As there is no additional mitigation, the residual effects remain what is outlined above in potential effects. This conclusion is repeated below for clarity.</p> <p>The contribution of the Proposed Development on employment is expected to be of high magnitude to businesses in the CSA in 2031. This combines with a high sensitivity receptor to result in an <b>indirect, permanent, long term major beneficial effect (significant) in the CSA across both 2031 and 2051</b>.</p> <p>The contribution of the Proposed Development on employment is expected to be of high magnitude to businesses in the SRCA in 2031. This combines with a medium sensitivity receptor to result in an <b>Indirect, Permanent, Long Term Moderate/Major Beneficial Effect (Significant) in the SRCA across both 2031 and 2051</b>.</p>
Convention centre provision		
Businesses (CSA, National Area)	Potential Effects	As part of the Proposed Development there is potential that a 55,000sqm (GEA) convention centre will be built. This will not be built for 2031, and the year of delivery is uncertain. For the purposes of assessment, it is assumed it is delivered by 2051.



Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
		<p>The convention centre would operate as an associated use within the ERC. It would create a synergistic relationship with the Theme Park, creating a work and play offering of a type not currently available in the UK.</p> <p>This is expected to attract additional convention-centric tourism to the UK and has the potential to benefit the convention industry within the CSA, as well as other visitor attraction businesses in the area.</p> <p>Conference facilities within the CSA are smaller and serve well-established markets, such as board meetings, local association gatherings and training workshops where intimate ambience and pricing are important considerations. This is not anticipated to be negatively impacted by the ERC facility.</p> <p>Other large conference centres typically exist closer to urban centres, such as the ExCeL London or the National Exhibition Centre. These facilities serve a differentiated market where town-centre access and existing client relationships are paramount. Accordingly, the conference centre at the ERC will generate demand for a new market segment and grow overall convention industry demand without eroding existing businesses</p> <p><u>Conclusions</u></p> <p>The potential effect on the contribution to conference and exhibition provision across the CSA and National Area is only assessed in the Proposed Developments year of maturity (2051).</p> <p>Overall, the impact on the conference and exhibition facilities across both the CSA and National Area is expected to be of negligible magnitude in 2051. This combines with a <b>medium sensitivity receptor to result in a Direct, Permanent, Long Term Minor/Negligible Beneficial Effect (Not Significant).</b></p>
	Additional Mitigation	None.
	Residual Effects	<p>As there is no additional mitigation, the residual effects remain what is outlined above in potential effects. This conclusion is repeated below for clarity.</p> <p>The potential effect on the contribution to conference and exhibition provision across the CSA and National Area is only assessed in the Proposed Developments year of maturity (2051).</p> <p>Overall, the impact on the conference and exhibition facilities across both the CSA and National Area is expected to be of negligible magnitude in 2051. This combines with a <b>medium sensitivity receptor to result in a Direct, Permanent, Long Term Minor/Negligible Beneficial Residual Effect (Not Significant).</b></p>
Disruption of businesses		
Businesses (Local Ara)	Potential Effects	<p><b>Chapter 5: Traffic and Transport (Volume 1)</b> finds very little significant impacts on traffic in the Operational Phase.</p> <p>Once the Theme Park is operational in 2031 it is estimated that there would an uplift on both total and HDV trips over a 24 hour period.</p> <p>There is expected to be some driver delay on Fisherwood Road in 2031, and a heightened risk of accidents for users of Broadmead Road.</p>



Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
		<p>Whilst the high presence of visitors can cause disruption to road network and increase noise levels, any disruption occurring down to this is expected to be outweighed by increased visitors spending in retail outlets, or industrial and logistics businesses benefitting through increased demand in the supply chain.</p> <p><b>Chapter 5: Traffic and Transport (Volume 1)</b> further finds significant beneficial effects with regards to severance in Manor Road.</p> <p>The Proposed Development is expected to include two F&amp;B units within its Entry Plaza venue, which does not require a ticket. Whilst it is possible that these restaurants attract visitors that may have otherwise visited another restaurant in the Local Area, this effect is expected to be more than balanced out by the increase in demand for restaurants in the Local Area through the 8.5 million and 12 million visitors attracted to the Theme Park.</p> <p><u>Conclusions</u></p> <p>Whilst some disruption may occur for businesses through increased traffic and presence of new competitors, any effect is expected to be outweighed by benefits associated with increased footfall and business opportunities associated with the scale of the Proposed Development.</p> <p>Overall, it is conservatively assumed that the impact of disruption on businesses across the Local Area is expected to be of negligible magnitude in 2031 and 2051.</p> <p>This combines with a <b>high sensitivity receptor to result in a Permanent, Indirect, Long Term, Minor/Negligible Beneficial effect (Not Significant).</b></p>
	<b>Additional Mitigation</b>	N/A.
	<b>Residual Effects</b>	<p>As there is no additional mitigation, the residual effects remain what is outlined above in potential effects. This conclusion is repeated below for clarity.</p> <p>Whilst some disruption may occur for businesses through increased traffic and presence of new competitors, any effect is expected to be outweighed by benefits associated with increased footfall and business opportunities associated with the scale of the Proposed Development.</p> <p>Overall, it is conservatively assumed that the impact of disruption on businesses across the Local Area is expected to be of negligible magnitude in 2031 and 2051.</p> <p>This combines with a <b>high sensitivity receptor to result in a Permanent, Indirect, Long Term, Minor/Negligible Beneficial Residual Effect (Not Significant).</b></p>
<b>Emergency services</b>		
Service providers (CSA, SRCA)	<b>Potential Effects</b>	<p>The Entertainment Resort Complex will be managed in line with best practice. As outlined in <b>Chapter 16: Major Accidents and Disasters (Volume 1)</b>, UDX has committed to managing the operations of the proposed Theme Park.</p> <p>In the Operational Phase, the impacts on demand for emergency health services will largely be felt through two routes – more visitors (and workers) being temporarily in the area who may (infrequently) make use of services and workers who move permanently into the area who place increased demand for</p>

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
		<p>housing which in turn places pressure on services. The former is an indirect effect of the development, and the latter is the indirect effect resulting from another indirect effect.</p> <p>The International Association of Amusement Parks and Attractions (IAAPA) surveyed 179 parks in North America and found that there were 1,281 ride related injuries in 2021. This equated to 3.7 injuries per million theme park attendances. Factored by the estimated attendance at the Proposed Development, it is estimated that there could be 30 ride related injuries in 2031 and 45 in 2051 which might require services.</p> <p>Workplace accidents also occur. Applying the national accident rate at work across all industries (1.5%) to all gross additional workers, it is estimated that there would be 120 injuries in 2031 and 190 in 2051. However, this is an overall injury rate, rather than an estimate of injuries requiring A&amp;E.</p> <p>Even in a cautious worst case scenario where all 235 injuries expected annually from workers and visitors attended accident and emergency services, this would equate to 0.9% of accident and emergency attendances across Bedfordshire Hospitals NHS Foundation Trust in March 2024.</p> <p>The increase in demand for police and fire emergency services is further expected to be minimal.</p> <p>It is rare for a fire to occur at an Entertainment Resort Complex. UDX is experienced in managing theme parks of the size and scale of the Proposed Development and have standard measures to prevent fires occurring. This includes regular inspections, fire drills, and close coordination with local fire departments. Based on the experience of UDX it is expected that the increase in demands placed on the fire services during operation would be negligible.</p> <p>UDX is experienced in minimising crime at their theme parks across the globe. It is in their interests to minimise crime so as to maximise guest experience. High levels of security will be on-Site at the Theme Park to minimise any crime. Please refer to the <b>Security and Emergency Management Plan (Document Reference 6.4.2.0)</b>. Based on the above this will not lead to a significant effect.</p> <p><u>Conclusion</u></p> <p>The effect of the Proposed Development on the demand for emergency services is expected to be of low magnitude in the CSA and SRCA in both 2031 and 2051. This combines with a medium sensitivity receptor to result in a <b>Permanent, Indirect, Long Term, Minor Adverse Effect (Not Significant) in the CSA and SRCA across both 2031 and 2051.</b></p>
	Additional Mitigation	<p>As per the <b>Security and Emergency Management Plan (Document Reference 6.4.2.0)</b>, UDX will provide first aid services to respond to urgent injuries and illnesses for guests, team members, contractors, and vendors, including basic life support like CPR, AED use, bleeding control, and fracture stabilisation. Patients needing further care, such as those with life-threatening emergencies or communicable diseases, will be referred to healthcare providers. UDX will also offer wellness support, reducing workplace risks and implementing health screening programs. UDX will collaborate with local healthcare providers and emergency responders, ensuring shared protocols, familiarisation with site risks, and conducting emergency drills to enhance incident response.</p>

Sensitive Receptor	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
		<p>UDX will liaise with the local health care system providers to validate shared understanding of available resources and support opportunities, share knowledge of operations and protocols for occupational incidents and return to work availabilities, and patient communications and information.</p> <p>UDX will also liaise with emergency responders related to site response locations, protocols, operational risks, and site familiarity to facilitate efficient and effective incident response. UDX will communicate and gain mutual understanding of onsite rescue/response resources and identification of agency support and equipment needs. UDX will offer and provide onsite emergency drills and training opportunities for responder agencies.</p>
	<b>Residual Effects</b>	<p>Following the mitigation, the effect of the Proposed Development on the demand for emergency services is expected to be of negligible magnitude in the CSA and SRCA in both 2031 and 2051. This combines with a medium sensitivity receptor to result in a <b>Permanent, Indirect, Long Term, Minor/Negligible Adverse Residual Effect (Not Significant) in the CSA and SRCA across both 2031 and 2051.</b></p>

## CUMULATIVE EFFECTS

- 13.5.2. The approach to assessment of socio-economic effects is inherently cumulative for most effects. The majority of the committed developments are commercial or residential developments within the CSA or SRCA. As described in the approach to future baseline, where relevant to the effects, the future baseline sets out expected trends in resident population, working age population, housing stock and employment from Local Plans. As the committed developments are all planned or within the pipeline, they are inherently factored into the forecasts which underpin those plans. A further cumulative assessment of effects would therefore be double counting.
- 13.5.3. The exception to this relates to the construction workforce required to build the committed developments. Due to the lack of detailed construction workforce forecasts within Local Plans, and the number of large infrastructure projects within the area, it is considered proportionate to carry out a more detailed assessment of potential construction workforce required for committed developments and the extent to which this overlaps with the construction period of the Proposed Development. This potential effect was also raised during engagement, and so the approach taken here is more detailed in this area to make sure stakeholder concerns are considered appropriately. This cumulative effect is summarised in **Table 13-58**.

**Table 13-58 – Cumulative assessment of construction employment**

Effect	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
Potential temporary employment generation effects (including indirect and induced effects)	<b>Potential Effects – Proposed Development</b>	The construction of the Proposed Development will directly support an estimated 9,850 construction job years, which in turn would support an estimated further 10,680 job years indirectly through supply chain activity and construction worker expenditure. The peak on-Site workforce is estimated to be 5,380 and is expected to occur in 2029. Of the peak on-Site workforce estimated, 4,525 workers would be sourced from the UK and 855 from outside the UK. The construction

Effect	Potential Effects/Additional Mitigation/Residual Effects and Monitoring	
		workforce is highly mobile and even at its peak the domestic workforce requirement only equates to 3% of the construction workforce across the LCA.
	<b>Cumulative assessment</b>	<p>An assessment of the construction workforce required for committed developments within the Proposed Development's Zone of Influence has been undertaken, with a specific focus on the Committed Developments where their construction timelines overlap with the peak construction of the Proposed Development. It is estimated that between 3,985 to 4,495 construction jobs would be required to deliver works associated with these committed developments.</p> <p>The Proposed Development's peak domestic construction workforce combined with the workforce requirements of these cumulative schemes would require between 6% of the LCA's construction workforce.</p>
	<b>Residual Effects and Monitoring</b>	The sensitivity of residents is medium across the LCA, and the magnitude of change is medium. Therefore, there is likely to be a direct, temporary, short-term <b>moderate beneficial</b> residual effect in 2029 ( <b>significant</b> ) after the cumulative assessment. The effect remains significant at the National Area.

## 13.6. DIFFICULTIES AND UNCERTAINTIES

- 13.6.1. Assessing the effects of the Proposed Development up to 2051 inherently introduces significant uncertainty around various influential factors, including shifts in leisure consumption patterns, evolving visitor preferences, demographic changes, and broader economic conditions. Additionally, the exact specifics of the Entertainment Resort Complex – including precise attractions, scale of facilities, operational practices, and associated infrastructure – are not yet fully determined at this stage. This lack of detailed information further complicates the socio-economic impact assessment, making it necessary to rely on broad assumptions and comparable case studies to inform initial evaluations. Leisure trends, in particular, are influenced by unpredictable elements such as technological advancements, changes in disposable income, and cultural shifts in recreational activities.
- 13.6.2. Moreover, accurately predicting demographic changes and regional growth over such a lengthy horizon adds complexity to the socio-economic assessment. Factors such as migration patterns, population ageing, employment dynamics, and housing market fluctuations can significantly alter baseline scenarios and impact projections. Consequently, socio-economic forecasts for long-term developments require cautious interpretation, with flexibility built into planning and mitigation strategies to accommodate future uncertainties and shifts in socio-economic conditions.

## 13.7. SUMMARY OF LIKELY SIGNIFICANT EFFECTS AND PROPOSED MITIGATION

- 13.7.1. **Table 13-59** below presents a summary of the likely significant effects relating to socio-economics as a result of the Proposed Development, and the mitigation measures proposed to avoid, prevent, reduce, or offset (if possible and required) any identified significant adverse effects. The table

summarises those effects that were identified within the assessment as likely to be significant prior to the consideration of mitigation. Significant effects are identified as major or moderate. Effects that are identified as negligible or minor are not considered to be significant, and therefore, are not listed in the summary table below.

**Table 13-59 – Summary of Likely Significant Socio-Economic Effects and Proposed Mitigation**

Table key: P/T = Permanent or Temporary, D/I = Direct or Indirect, ST/MT/LT = Short Term, Medium Term or Long Term, N/A = Not Applicable

Receptor	Description of the Effect	Significance of Effect with Embedded Mitigation	Additional Design, Mitigation or Enhancement Measure	Residual Effects	Classification of Cumulative Effect (blank if cumulative schemes not considered)	Significance
<b>Construction Phase</b>						
Residents	<b>Construction employment</b> – potential temporary employment generation effects (including indirect and induced effects)	<b>Moderate Beneficial</b> (LCA, 2029) T/D & I/ST	N/A	<b>Moderate Beneficial</b> (LCA, 2029) T/D & I/ST	<b>Moderate Beneficial</b> (LCA, 2029) T/D & I/ST	<b>Significant</b>
Residents	<b>Construction skills and training</b> – potential temporary effect of employment on the labour market, skills and training	<b>Minor Beneficial</b> (CSA, 2026-2031) T/D/MT	<b>Employment and Skills Plan (Document Reference 6.12.0)</b> provides initiatives designed to maximise the employment and skills benefits for residents in the CSA (as well as other nearby local authorities) during construction. The responsibility of implementing these initiatives will be that	<b>Moderate Beneficial</b> (CSA, 2026-2031) T/D/MT		<b>Significant</b>

Receptor	Description of the Effect	Significance of Effect with Embedded Mitigation	Additional Design, Mitigation or Enhancement Measure	Residual Effects	Classification of Cumulative Effect (blank if cumulative schemes not considered)	Significance
			<p>of the Principal Contractor(s) during construction.</p> <p>Specific measures are summarised below:</p> <ul style="list-style-type: none"> <li>UDX will make sure that Principal Contractor(s) actively engage with local students within Bedford and Central Bedfordshire and give priority access to qualified local students in the hiring process.</li> <li>UDX will require that the Principal Contractor(s) for construction will have 'The 5% Club' accreditation (or equivalent at the time of contracting services). This will make sure that the Principal Contractor(s) of the proposed Theme Park is committed to providing 5% of positions in 'earn and learn' positions, including apprenticeships, sponsored students, and graduates on formalised training schemes. Members of 'The 5% Club' across the UK collectively employ more than 1.8m employees, 79,000 apprentices, 18,000 people on graduate programmes, and 9,000 sponsored students. This means that</li> </ul>			



Receptor	Description of the Effect	Significance of Effect with Embedded Mitigation	Additional Design, Mitigation or Enhancement Measure	Residual Effects	Classification of Cumulative Effect (blank if cumulative schemes not considered)	Significance
			<p>more than 106,000 people have been given skills based training opportunities by 'The 5% Club' members.</p> <ul style="list-style-type: none"> <li>UDX commits to ensuring that local skilled workers within Bedford and Central Bedfordshire receive priority access to employment opportunities. Principal Contractor(s) will be required to actively promote these opportunities, emphasising the importance of hiring qualified people locally within Bedford and Central Bedfordshire;</li> <li>UDX will require the Principal Contractor(s) and any relevant sub-contractors to pay at least the National Living Wage. A fair and liveable wage enables employees to lead a dignified life, with access to the opportunities and choices needed to fully participate in society.</li> </ul>			
Operational Phase						

Receptor	Description of the Effect	Significance of Effect with Embedded Mitigation	Additional Design, Mitigation or Enhancement Measure	Residual Effects	Classification of Cumulative Effect (blank if cumulative schemes not considered)	Significance
Businesses	<b>Trade creation</b> – potential effects of trade creation (and diversion) relating to theme parks	<b>Major Beneficial</b> (National Area, 2031, 2051) P/D/LT	N/A	<b>Major Beneficial</b> (National Area, 2031, 2051) P/D/LT		<b>Significant</b>
Businesses	<b>Economic output</b> – potential effects of economic output on the national economy	<b>Moderate Beneficial</b> (National Area, 2031, 2051) P/I & D/LT	The <b>Employment and Skills Plan (Document Reference: 6.12.0)</b> provides initiatives designed to maximise the benefits for local businesses in the supply chain.	<b>Moderate beneficial</b> (National Area, 2031, 2051) P/I & D/LT		<b>Significant</b>
Businesses	<b>Additional spending</b> – potential effect of increased visitor spending on businesses	<b>Moderate/Major Beneficial</b> (CSA, 2031, 2051)  <b>Moderate Beneficial</b> (SRCA 2031, 2051) P//LT	N/A	<b>Moderate/major beneficial</b> (CSA, 2031, 2051)  <b>Moderate beneficial</b> (SRCA 2031, 2051) P//LT		<b>Significant</b>

Receptor	Description of the Effect	Significance of Effect with Embedded Mitigation	Additional Design, Mitigation or Enhancement Measure	Residual Effects	Classification of Cumulative Effect (blank if cumulative schemes not considered)	Significance
Residents	<b>Employment</b> – potential employment generation effects (including indirect and induced effects, and characteristics of jobs generated by the project)	<b>Major beneficial</b> (CSA, SRCA, 2031, 2051) <b>Moderate beneficial</b> (LCA, National area, 2031, 2051) P/I & D/LT	N/A	<b>Major beneficial</b> (CSA, SRCA, 2031, 2051) <b>Moderate beneficial</b> (LCA, National area, 2031, 2051) P/I & D/LT		<b>Significant</b>
Residents	<b>Skills and training</b> – potential effect of employment on the labour market, skills and training	<b>Moderate beneficial</b> (CSA, 2031, 2051) P/D/LT	UDX has a long track record of providing such training and skills initiatives, having completed a number of initiatives that work with local schools and provide training from their sites, including in Orlando and Japan. <b>Employment and Skills Plan (Document Reference 6.12.0)</b> provides initiatives designed to maximise the employment and skills benefits for residents in the CSA (as well as other nearby local authorities). The responsibility of implementing these initiatives will be that of the UDX during the Operational Phase.	<b>Moderate/major beneficial</b> (CSA, 2031, 2051) P/D/LT		<b>Significant</b>

Receptor	Description of the Effect	Significance of Effect with Embedded Mitigation	Additional Design, Mitigation or Enhancement Measure	Residual Effects	Classification of Cumulative Effect (blank if cumulative schemes not considered)	Significance
			<p>Specific measures are summarised below:</p> <ul style="list-style-type: none"> <li>UDX will commit to providing 55 apprenticeships annually by the second full year of operation, rising to 70 apprenticeships annually from the fifth full year of operation;</li> <li>UDX will commit to providing 15 internships annually by the second full year of operation, rising to 35 from the fifth full year of operation;</li> <li>By the second full year of operation the Theme Park will provide support for high risk or socio-economically disadvantaged populations. Support will be delivered for 40 eligible students. This could include programming such as Mentorship Programmes, Career Guidance, Job Readiness Upskilling, and other Support for Educational Resources as needed; and</li> <li>UDX will commit to working with local organisations that provide opportunities for those with varying abilities. UDX will commit to providing</li> </ul>			

Receptor	Description of the Effect	Significance of Effect with Embedded Mitigation	Additional Design, Mitigation or Enhancement Measure	Residual Effects	Classification of Cumulative Effect (blank if cumulative schemes not considered)	Significance
			support, training, and accommodations to help local people with varying abilities secure meaningful employment within the Theme Park.			
Businesses	<b>Visitor accommodation</b> – potential effect of new visitors on the accommodation market	<b>Major Beneficial</b> (CSA, 2031, 2051) <b>Moderate/Major Beneficial</b> (SRCA, 2031, 2051) P//LT	N/A	<b>Major beneficial (CSA, 2031, 2051)</b> <b>Moderate/major beneficial (SRCA, 2031, 2051)</b> P//LT		<b>Significant</b>

## 13.8. REFERENCES

- **Ref. 13.1:** The London Resort, 2020. Environmental Statement, Volume 1: Main Statement. Chapter 7 – Land use and socio-economic effects. Available at: <https://nsip-documents.planninginspectorate.gov.uk/>. Accessed May 2025
- **Ref. 13.2:** IEMA, 2017. Delivering Proportionate EIA. Available at: <https://www.iema.net/media/lb0d3ten/delivering-proportionate-eia-july-2017.pdf>. Accessed May 2025
- **Ref. 13.3:** Considerate Constructors Scheme Best Practice Hub, 2019. Reducing the Opportunity for Crime at Construction Sites. Available at: <https://ccsbestpractice.org.uk/entries/reducing-the-opportunity-for-crime-at-construction-sites/>. Accessed May 2025
- **Ref. 13.4:** ONS, 2021. Census. Available at: <https://www.nomisweb.co.uk/>. Accessed March 2025
- **Ref. 13.5:** CITB, 2023. Workforce Mobility and Skills in the UK Construction Sector 2022. Regional breakdowns are available. Available at: <https://www.citb.co.uk/>. Accessed May 2025
- **Ref 13.6:** ONS, 2024. Annual Population Survey. Available at: <https://www.nomisweb.co.uk/>. Accessed March 2025
- **Ref. 13.7:** CITB, 2024. CSN Industry Outlook 2024-2028. Available at: <https://www.citb.co.uk/>. Accessed May 2025
- **Ref. 13.8:** ONS, 2020. Subnational population projections for England: 2018-based. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/>. Accessed March 2025
- **Ref. 13.9:** ONS, 2024. Business Register and Employment Survey 2023. Available at: <https://www.nomisweb.co.uk/>. Accessed March 2025
- **Ref. 13.10:** VisitEngland, 2025. England Occupancy Survey – December 2024 Results. Available at: <https://www.visitbritain.org/>. Accessed March 2025
- **Ref. 13.11:** VisitEngland, 2024. England Occupancy Survey – July 2024 results. Available at: <https://www.visitbritain.org/>. Accessed March 2025
- **Ref. 13.12:** VisitBritain, 2016. England Accommodation stock audit. Available at: <https://www.visitbritain.org/research-insights/england-accommodation-stock-audit>. Accessed March 2025
- **Ref. 13.13:** Sykes, 2023. Holiday Let Occupancy Rates. Available at: [Holiday Let Occupancy Rates | Sykes Holiday Cottages \(sykescottages.co.uk\)](https://sykescottages.co.uk/). Accessed August 2024
- **Ref. 13.14:** MHCLG, 2024. English Housing Survey 2023 to 2024: headline report. Available at: <https://www.gov.uk/government/collections/>. Accessed May 2025
- **Ref. 13.15:** ONS, 2023. Subnational estimates of dwellings by tenure, England. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/>. Accessed May 2025
- **Ref. 13.16:** GfK Consumer Confidence Index, 2025. <https://tradingeconomics.com/united-kingdom/consumer-confidence>. Accessed April 2025
- **Ref. 13.17:** WTM, 2024. WTM Global Travel Report 2024. Available at: <https://tourismanalytics.com/>. Accessed April 2025

- **Ref. 13.18:** Savills, 2023. Spotlight: UK Hotels 2023. Available at: [https://www.savills.co.uk/research\\_articles/229130/349434-0](https://www.savills.co.uk/research_articles/229130/349434-0). Accessed May 2025
- **Ref. 13.19:** ONS, 2024. Live tables of dwelling stock. Available at: <https://www.gov.uk/government/collections/dwelling-stock-including-vacants>. Accessed February 2025
- **Ref. 13.20:** MHCLG, 2024. English Housing Survey. Available at: <https://www.gov.uk/government/collections/english-housing-survey>. Accessed March 2025
- **Ref. 13.21:** MHCLG, 2024. National Planning Policy Framework. Available at: <https://www.gov.uk/>. Accessed April 2025
- **Ref. 13.22:** Retrieved from: <https://www.forbes.com/uk/advisor/business/remote-work-statistics/>. Accessed May 2025
- **Ref. 13.23:** His Majesty's Chief Inspector of Constabulary, 2023. State of Policing: The Annual Assessment of Policing in England and Wales. Available at: <https://www.gov.uk/government/publications/state-of-policing-2023>. Accessed March 2025
- **Ref. 13.24:** His Majesty's Inspectorate of Constabulary and Fire & Rescue Services, 2023. PEEL Assessment. Available at: <https://hmicfrs.justiceinspectorates.gov.uk/peel-reports-year/2023-25/>. Accessed March 2026
- **Ref. 13.25:** AECOM, 2024. Theme Index 2023. Available at: <https://aecom.com/theme-index/>. Accessed May 2025
- **Ref. 13.26:** Retrieved from: [https://www.worldometers.info/world-population/population-by-country/#google\\_vignette](https://www.worldometers.info/world-population/population-by-country/#google_vignette). Accessed August 2024
- **Ref. 13.27:** Retrieved from: [World Tourism Ranking by Country 2024 - WP Travel](#). Accessed May 2025
- **Ref. 13.28:** Retrieved from: <https://queue-times.com/parks/3/attendances>. Accessed May 2025
- **Ref. 13.29:** UK Government, 2019. Tourism Sector Deal. Available at: [Tourism: Sector Deal - GOV.UK](#). Accessed May 2025
- **Ref. 13.30:** UK Government, 2021. Tourism Recovery Plan. Available at: [Tourism Recovery Plan - GOV.UK](#)
- **Ref. 13.31:** ONS 2024, International Passenger Survey 2019-2023. Available at: <https://www.visitbritain.org/research-insights/about-international-passenger-survey>. Accessed February 2024
- **Ref. 13.32:** ONS, 2024. GDP at current prices – real-time database (YBHA). Available at: <https://www.ons.gov.uk/economy/>. Accessed March 2025
- **Ref. 13.33:** Retrieved from: <https://home.barclaycard/press-releases>. Accessed August 2024
- **Ref. 13.34:** Eventbrite, 2017. Fuelling the Experience Economy. Available at: [Eventbrite Research: Millennials Fuel the Experience Economy](#). Accessed May 2025
- **Ref. 13.35:** Blooloo, 2023. IAAPA releases 2022-2026 Global Theme and Amusement Park Outlook Report. Available at: [IAAPA 2022-2026 Global Theme Park Outlook Report | blooloo](#). Accessed May 2025



- **Ref. 13.36:** Deloitte, 2025. The Deloitte Consumer Tracker. Available at: <https://www.deloitte.com/>. Accessed May 2025
- **Ref. 13.37:** Interpark, 2024. Global Amusements Park Market. Available at: <https://interpark.co.uk/>. Accessed May 2025
- **Ref. 13.38:** Blooloo, 2024. Theme park investment stories. Available at: <https://blooloo.com/theme-park/>. Accessed December 2024
- **Ref. 13.39:** ONS, 2025. National population projections: 2022-based interim. Available at: <https://www.ons.gov.uk/>. Accessed May 2025
- **Ref. 13.40:** United Nations, 2030. Population Estimates. Available at: <https://www.un.org/>. Accessed May 2025
- **Ref. 13.41:** Barclays, 2019. Great British Staycation. Available at: <https://home.barclays/news/press-releases>. Accessed May 2025
- **Ref. 13.42:** Verdant Leisure, 2023. 2024 Travel Trend Report. Available at: <https://www.verdantleisure.co.uk/>. Accessed May 2025
- **Ref. 13.43:** DCMS, 2024. Using annual estimates from summed monthly GVA data. Available at: <https://www.gov.uk/government/statistics/dcms>. Accessed March 2025
- **Ref. 13.44:** DCMS, 2024. DCMS and digital sector GVA 2022 (provisional). Available at: <https://www.gov.uk/government/statistics/dcms>. Accessed March 2025
- **Ref. 13.45:** ONS, 2024. GDP first quarterly estimate, UK: April to June 2024. Available at: <https://www.ons.gov.uk/>. Accessed May 2025
- **Ref. 13.46:** EY, 2024. Regional UK economic growth gap to widen, with Southern England ahead. Available at: <https://www.ey.com/>. Accessed December 2024
- **Ref. 13.47:** Retrieved from: <https://www.thenationalnews.com/business/economy/2024/08/15/will-the-uk-economy-support-keir-starmers-ambitions/> Accessed August 2024
- **Ref. 13.48:** Retrieved from: [https://www.womblebond dickinson.com/sites/default/files/2019-07/WBD\\_Retail-Report\\_0.pdf](https://www.womblebond dickinson.com/sites/default/files/2019-07/WBD_Retail-Report_0.pdf). Accessed August 2024
- **Ref. 13.49:** Nexus Planning, 2020. Bedford Town Centre Study. Available at: <https://www.bedford.gov.uk/>. Accessed May 2025
- **Ref. 13.50:** Bedford Independent, 2023. Christmas footfall up by 18% as town centre vacancy rates remain below national average. Available at: <https://www.bedfordindependent.co.uk/>. Accessed May 2025
- **Ref. 13.51:** Central Bedfordshire, 2017. Central Bedfordshire Retail Study, Available at: <https://centralbedfordshire.oc2.uk/>. Accessed May 2025
- **Ref. 13.52:** Carter Jonas, 2018. Milton Keynes Retail Capacity & Leisure Study. Available at: <https://www.milton-keynes.gov.uk/>. Accessed April 2025
- **Ref. 13.53:** WYG Planning & Environment, 2015. Luton Borough Council Retail Study Update
- **Ref. 13.54:** Retrieved from: <https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator>. Accessed August 2024

- **Ref. 13.55:** Luton Borough Council, 2017. Local Plan 2011-2031. Available at: <https://m.luton.gov.uk/>. Accessed May 2025
- **Ref. 13.56:** Bedford BC, 2020. Local Plan 2030. Available at: <https://www.bedford.gov.uk/>. Accessed May 2025
- **Ref. 13.57:** Milton Keynes Council, 2019. Plan MK 2016-2031. Available at: <https://www.milton-keynes.gov.uk/planning-and-building/developingmk/planmk>. Accessed May 2025
- **Ref. 13.58:** Luton and Central Bedfordshire Council, 2015. Central Bedfordshire and Luton Strategic Housing Market Assessment. Available at: <https://www.centralbedfordshire.gov.uk/>. Accessed May 2025
- **Ref. 13.59:** Bedford BC, 2016. Bedford Strategic Housing Market Assessment Update. Available at: <https://www.bedford.gov.uk/housing/housing-strategies>. Accessed May 2025
- **Ref. 13.60:** Milton Keynes Council, 2017. Milton Keynes Strategic Housing Market Assessment 2016-2031. Available at: <https://www.milton-keynes.gov.uk/>. Accessed May 2025
- **Ref. 13.61:** Central Bedfordshire Council, 2021. Central Bedfordshire Local Plan 2015-2035. Available at: <https://www.centralbedfordshire.gov.uk/>. Accessed May 2025
- **Ref. 13.62:** DfE, 2023. Key stage 2 attainment. Available at: <https://www.gov.uk/government/statistics/key-stage-2-attainment-2023>. Accessed December 2024
- **Ref. 13.63:** DfE, 2024. Explore Education Statistics. Available at: <https://explore-education-statistics.service.gov.uk/>. Accessed March 2025
- **Ref. 13.64:** Experience Bedfordshire, 2025. Things to Do in Bedfordshire. Available at: <https://www.experiencebedfordshire.co.uk/things-to-do>. Accessed May 2025
- **Ref. 13.65:** DCMS, 2019, International Business Events Action Plan. Available at: <https://www.gov.uk/government/publications/international-business-events-action-plan>. Accessed May 2025
- **Ref. 13.66:** Cvent, 2024. 10 Event Industry Trends You Must Know in 2024. Available at: <https://www.cvent.com/en/resource/platform/meeting-and-event-trends-you-need-know-2024>. Accessed May 2025
- **Ref. 13.67:** UKCAMS, 2025. Launch of new research. Available at: <https://ukcams.org.uk/news%20about%20ukcams.html>. Accessed May 2025
- **Ref. 13.68:** Homes & Communities Agency, 2014. Additionality Guide. Available at: <https://assets.publishing.service.gov.uk/>. Accessed May 2025
- **Ref. 13.69:** MHCLG, 2025. The MHCLG Appraisal Guide: Third Edition. Available at: <https://www.gov.uk/government/publications/the-mhclg-appraisal-guide>. Accessed May 2025
- **Ref. 13.70:** LDP, 2020. London Resort DCO, Environmental Statement Volume 2: Appendices, Appendix 7.6 Attendance Technical Note. Available at: <https://nsip-documents.planninginspectorate.gov.uk/>. Accessed May 2025
- **Ref. 13.71:** Homes & Communities Agency, 2015. Employment Density Guide. Available at: <https://www.kirklees.gov.uk/>. Accessed May 2025

- **Ref. 13.72:** VisitEngland, 2024. Domestic day visits: Q4 2023 and 2023 overall. Available at: <https://www.visitbritain.org/>. Accessed March 2025
- **Ref. 13.73:** VisitEngland, 2024. Domestic overnight trips: GB and England. Available at: <https://www.visitbritain.org/>. Accessed March 2025
- **Ref. 13.74:** Barclays, 2017. Destination UK. Available at: <https://home.barclays/>. Accessed May 2025
- **Ref. 13.75:** Retrieved from: <https://open.endole.co.uk/>. Accessed May 2025
- **Ref. 13.76:** ONS, 2024. Population estimates for the UK, England, Wales, Scotland, and Northern Ireland: mid-2022. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/>. Accessed February 2025.
- **Ref. 13.77:** Resolution Foundation, 2024. Assessing the labour market since 2010 and the challenges for the next government. Available at: <https://www.resolutionfoundation.org/>. Accessed May 2025
- **Ref. 13.78:** HSE, 2015. The Construction (Design and Management) Regulations 2015. Available at: <https://www.hse.gov.uk/construction/cdm/2015/index.htm>. Accessed May 2025
- **Ref. 13.79:** DLP, 2012. Economic and social impact of Disneyland Paris 1992-2012. Available at: <https://www.johnreganassociates.com/>. Accessed May 2025
- **Ref. 13.80:** ONS, 2024. Gross Value Added 2022. Available at: <https://www.ons.gov.uk/economy/grossvalueaddedgva>. Accessed March 2025
- **Ref. 13.81:** NHS Digital, 2025. A&E Attendances & Emergency Admission monthly statistics, NHS and independent sector organisations in England. Available at: <https://www.england.nhs.uk/>. Accessed March 2025
- **Ref. 13.82:** Universal Orlando Resort: <https://www.universalorlando.com/web/en/gb/theme-parks/epic-universe>. Accessed May 2025
- **Ref. 13.83:** Yahoo Finance: <https://finance.yahoo.com/news/universal-orlando>. Accessed March 2025
- **Ref. 13.84:** Universal Kids Resort: <https://universalkidsresort.com/landing/en/us/universal-kids-resort>. Accessed May 2025
- **Ref. 13.85:** ExCeL London: <https://www.excel.london/organiser/venue-spaces/event-halls>. Accessed May 2025
- **Ref. 13.86:** Exhibition news: <https://exhibitionnews.uk/the-10-largest-exhibition-venues-in-the-uk-for-your-next-event/>. Accessed May 2025
- **Ref. 13.87:** Deloitte, 2025. The Deloitte Consumer Tracker Q4 2024. Available at: <https://www.deloitte.com/>. Accessed February 2025
- **Ref. 13.88:** Verdant Leisure, 2024. 2025 Travel Trend Report. Available at: <https://www.verdantleisure.co.uk/media/sianfbtr/verdant-leisure-travel-trends-2025.pdf>. Accessed May 2025
- **Ref. 13.89:** The Independent, 2025. <https://www.independent.co.uk/business/starmer-to-pitch-uk-as-stable-place-to-do-business-at-october-trade-summit-b2590765.html>

- **Ref. 13.90:** CoStar, 2025. CoStar Analysis
- **Ref. 13.91:** Department for Education, 2023. Participation in education, training and NEET age 16 to 17 by local authority. Available at: <https://explore-education-statistics.service.gov.uk/>. Accessed February 2025
- **Ref 13.92:** Retrieved from: <https://queue-times.com/parks/1/attendances>. Accessed May 2025
- **Ref 13.93:** Retrieved from: <https://queue-times.com/parks/2/attendances>. Accessed May 2025
- **Ref 13.94:** Retrieved from: <https://queue-times.com/parks/27/attendances>. Accessed May 2025
- **Ref 13.95:** MHCLG, 2025. Fire Statistics Data Tables. Retrieved from: <https://www.gov.uk/government/statistical-data-sets/fire-statistics-data-tables#response-times>. Accessed May 2025
- **Ref 13.96:** Retrieved from: <https://www.excel.london/visitor/expansion>. Accessed June 2025
- **Ref 13.97:** Retrieved from: <https://www.theguardian.com/business/2001/feb/19/5>. Accessed June 2025



8 First Street  
Manchester  
M15 4RP

**wsp.com**