UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT

Former Kempston Hardwick Brickworks and adjoining land, Bedford

Design and Access Statement

Report reference: 6.2.0

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UNIVERSAL DESTINATIONS & EXPERIENCES

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GLOSSARY

Table 1: Acronyms

Acronym	Description
AIL	Abnormal Indivisible Loads
Bedford BC	Bedford Borough Council
CWS	County Wildlife Site
DAS	Design and Access Statement
DfT	Department for Transport
EA	Environment Agency
EIA	Environmental Impact Assessment
ERC	Entertainment Resort Complex
ES	Environmental Statement
EWR	East West Rail
GVA	Gross Value Added
ha	Hectare
HE	Historic England
HGV	Heavy Goods Vehicle (>3.5 tonnes gross vehicle weight)
HSE	Health and Safety Executive
IDB	Internal Drainage Board
LGV	Light Goods Vehicle (<3.5 tonnes gross vehicle weight)
MHCLG	Ministry for Housing, Communities and Local Government
NE	Natural England
NH	National Highways
NPV	Net Present Value
NR	Network Rail
NMU	Non-Motorised User
UDX	Universal Destination & Experiences
TWAO	Transport and Works Act Order

Capitalised terms that are not defined within this document shall have the same meaning as set out in Appendix 0.1 of the Environmental Statement Glossary and Acronyms **(Document Reference 4.0.1.0)**. Those terms used in this document that are not defined in Appendix 0.1 are defined in Table 2.

Table 2: Defined Terms Used in this DAS

Term	Description
Controlling Document	Documents which place controls on the development which could come forward under any planning permission granted and which must be complied with.
Design and Access Statement (DAS)	A report that provides a framework to explain the design approach to a proposed development and how that proposed development is a suitable response to the site and its setting and demonstrate that it can be adequately accessed by prospective users.
Operative Document	Operative documents are limited to the Site Location Plan **(Document Reference 1.6.0**) and Primary Access Plan **(Document Reference 1.7.0)** and control the Site to which any planning permission granted would relate and the primary access points to the existing road network.
Grade seperated crossings	Where two or more surface transport routes cross each other at different heights (grades) so that they will not disrupt the traffic flow on other transit routes when they cross each other. This could include a road and a pedestrian bridge, or two roads, or a road and a railway, for example.
TCPA 1990	The Town and Country Planning Act 1990 (as amended).

FOREWORD

At Universal Destinations & Experiences we welcome all, to experience that one-of-a-kind Universal thrill of being fully alive! From our global destinations with luxury suites, world-class amenities, and serene garden paths to our universally acclaimed lands and attractions that have changed the industry forever, we create immersive worlds – once only dreamed – that thrill, surprise and ultimately delight our global guests.

Imagine a place unlike anywhere else in the world, where friends and family come together to laugh, explore, and create memories to last a lifetime.

It all starts with a blank page. With each new project we create, we ask big questions. What's going to make our guests' dreams come true? How do we top what we've already done? How do we make this not just a destination, but an experience? How will this appeal to the local market? How will this change it for the better?

We bring the most talented designers, artists, storytellers, and engineers in the world together to take those answers – those ideas – and turn them into reality. We've changed the industry with groundbreaking new attractions. We changed the industry again with immersive lands like never before. We've changed it again with the grand opening of Epic Universe in 2025. We'll continue to change the face of the industry when the gates of this resort open for the first time.

We change more than cities and skylines. We change lives by creating new industry and meaningful work. We change an ordinary parcel of land into something extraordinary – into a place where people aspire to visit, and where people are proud to work. If we can do that in the hearts of Orlando, Hollywood, Singapore, Beijing, and Japan, just imagine what we can do here. Imagine the memories we can make.

The families we can bring closer together. The epic stories we can tell.

This destination will be the home to not only a theme park, but also hotels, restaurants, a conference centre, verdant public spaces, and additional development for the thousands of opportunities this project brings. This means a mix of urban and suburban areas that include new roadways, new infrastructure, and new transportation networks. It means a substantial and continued commitment to the Bedford community and to the economic prosperity of the United Kingdom.

This is the future of Universal, but it's only the beginning.

As this destination evolves, we plan to implement new innovations in technology, entertainment, and hospitality. What we will be able to offer the Bedford community will continue to expand, and our partnerships with the local communities will become deeper and stronger. This growth and development will always respond to our guests' needs and fulfil their wishes, providing the world-class services and experiences that define us across recreation, lodging, dining, entertainment, and themed environments alike.

The resort will offer the internationally celebrated Universal experience.

Whether our guests come by car, bus, or train, from the moment they step on to the property they'll feel the promise of excitement and thrill. They'll be surrounded by a place that will evoke the spirit of the Hollywood dream before they step through the iconic Universal Arch into a new vision of our Studio Parks.

Throughout their day, our guests will experience blockbuster attractions, adrenaline-pumping coasters, and mind-blowing spectaculars. They'll come face-to-face with incredible creatures, heroes, and villains. They'll discover great food,

new laughs, new ways to play, and step into immersive worlds they've only ever dreamed of.

Our goal with this project is to inspire a new generation to be creative. To unleash their talents. To live their dream of being the stars they know themselves to be in our universe – now, their universe. This place will be a playground of imagination that brings together everything Universal has for their guests – iconic characters, iconic places, iconic experiences, and fan-favourites that span generations of fans.

To those that come to this resort we say, live the impossible. Dare to go on new, unbelievable adventures. Come face-to-face with thrill. Laugh until your sides hurt. Become the heroes and heroines of your own incredible journeys. To them we say, come one, come all, come together, and...

Welcome to Universal Studios.

1.0 INTRODUCTION

Introduction

1.1 This DAS has been prepared on behalf of Universal Destinations & Experiences (UDX) ("the Promoter") which is seeking planning permission for the construction and operation of a Universal Entertainment Resort Complex (ERC), and associated development, in Bedford. The proposal is sponsored by the Department for Culture Media and Sport ("DCMS"). The Department for Transport ("DfT") and its associated arm's-length bodies have assisted in the development of the highways and rail related elements of the proposal with Bedford Borough Council ("Bedford BC"). The proposal intends to provide sufficient information to enable the Secretary of State for Housing, Communities and Local Government ("MHCLG") to consult on and consider making a planning decision.

1.2 The Site is located south-west of Bedford, Bedfordshire and is broadly to the east of the A421 and west of the Midland Main Line and is on the former Kempston Hardwick brickworks and agricultural land. The Site is divided into four main land areas referred to in the planning proposal as the Core Zone, Lake Zone, West Gateway Zone, and East Gateway Zone. The proposed ERC lying within these zones would allow a theme park and associated uses including retail, dining, entertainment; visitor accommodation; sport, recreation, leisure and spa facilities; venues with conference and convention spaces; associated services and uses for any operational or administrative functions; utilities generation, storage, collection, treatment and processing facilities associated with the ERC; vehicle and cycle parking, maintenance and servicing, and transportation hubs; access routes and circulation spaces; landscaping; utility infrastructure; and use of land necessary to support construction.

1.3 The planning proposal also includes road and rail-related development including:

- a new A421 junction;
- an expanded railway station on the Thameslink/Midland Main Line at Wixams Rail Station;
- improvements to Manor Road; and
- improvements to certain other local roads.

1.4 It also safeguards land for a potential new railway station on the proposed EWR Bletchley to Bedford line, should this come forward in the future.

Purpose of Report

1.5 The purpose of this DAS is to provide a summary of the site context and design process undertaken to date and to explain the process which will be followed to ensure that the development of the detailed design follows the principles of good design and delivers the mitigation relied upon in the Environmental Impact Assessment (EIA). It also helps bring to life UDX's proposals in an easily accessible way and explains how issues relating to access to the Proposed Development have been dealt with.

1.6 While a DAS is not a requirement of the planning proposal, UDX recognises the importance of explaining the design process undertaken and of delivering good design in its developments and so has chosen to include this DAS. Accordingly, this DAS has been prepared using the legislative framework set out at Part 3, Article 9, paragraph 3 of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

1.7 This DAS focuses heavily on the design and access elements of the ERC, as this forms the bulk of the Proposed Development and generates the need for the other works. However, the design process relating to the road and rail-related works are also considered, where relevant.

Design Overview

1.8 UDX has decades of experience delivering ERCs with unique and special immersive environments around the globe. This starts with creating a sense of arrival through the use of unique landscaping and signage that is different from that outside the property, consistent with this philosophy of an immersive environment, where the public gets its initial exposure to the ERC. The arrival experience is a central part of how UDX plans its resorts. Providing a level of landscape design and creativity along roadways and perimeters consistent with the creativity elsewhere within the ERC is a fundamental part of the ability to create this sense of place for visitors. For those arriving by car, this would include tree-lined boulevards and layered landscaping with unique planting, for those arriving by train and bus, it would include a safe and positive experience of moving through the transport hub with ease, and for all it is a sense that you are arriving at a special place, enjoying the restaurants, shops and facilities of the Entry Plaza.

1.9 UDX also understands what it takes to run an ERC of this size and create a phenomenal guest experience. As well as the attractions and experiences that guests see on the outside, there is a huge amount of work behind the scenes, from creating meals from scratch on site, to employee catering and welfare, from ensuring the health and safety of everyone in the ERC to maintaining ride safety. This is a complex operation which UDX has the understanding and expertise to deliver.

1.10 These decades of knowledge and experience have all informed the design of the scheme to date and will continue to inform it going forward.

Structure

1.11 The rest of this DAS is structured as follows:

- **2.0 Background and context** – provides the background for UDX selecting the Site.
- **3.0 Benefits** – Provides an overview of the benefits of the Proposed Development.
- **4.0 Site Overview** – sets out an understanding of the Site's context, opportunities and constraints that have informed the design of the Proposed Development to date.
- **5.0 Vision and Design Approach** – explains UDX's vision for the Universal Destinations & Experiences UK Project and the approach to level of detail and parameters, having regard to the early stage of design of the Proposed Development.
- **6.0 Proposed Development** – provides a summary of the Proposed Development.
- **7.0 Public Engagement and Design Evolution** – explains the engagement carried out to date with residents and businesses living and working near the Site and with other consultees including Bedford BC, the Environment Agency, Natural England, Historic England and the Health and Safety Executive.
- **8.0 Design Components** – provides an explanation of the design development to date in relation to each main component of the Proposed Development including in relation to use, amount, layout, scale, appearance and landscape and biodiversity.
- **9.0 Access** – explains the approach to access to the Proposed Development by all and the principles which will be used to inform detailed design.
- **10.0 Next Steps**

Figure 1: Reference imagery of Garden Walk pathway at Universal Orlando Resort

2.0 BACKGROUND AND CONTEXT

2.1 UDX is a leader in operating the most innovative and immersive theme parks and resorts around the world. It is part of Comcast Corporation, a global media and technology company that also includes NBCUniversal International and Sky in the UK. UDX is proposing a major new ERC of which there is nothing comparable in the UK.

2.2 The Proposed Development as a theme park and international tourist destination in its own right fills a gap in both the UK and European market. The theme park market is vibrant and growing, however, with the exception of Disneyland Paris, the most successful destinations are located outside of Europe. The potential for a new world-class destination in the UK is a generational opportunity to deliver jobs and growth but also to create a new strand to the UK's bow as a tourism destination. There is a need for private sector investment on a large scale to kick-start growth and enable a strong UK economy. Furthermore, the Proposed Development is delivering investment which facilitates jobs and growth while simultaneously providing a unique offering to the tourism industry.

2.3 UDX will use its industry-leading experience in building, owning and operating ERCs to deliver a world class tourism destination. Delivering such a place is about more than just a theme park and to be successful and fully capitalise on the economic benefit, it is important that the ERC delivers the range of complimentary uses that are seen in international ERCs across the globe. This includes hotels, retail, restaurant and conference facilities which together provide customers with the full range of entertainment facilities and places to stay that will contribute towards making this a successful project. UDX's intention is for this ERC to be the most successful in Europe and this was the starting point in identifying a suitable site and deciding the mix of uses necessary to include in the proposals.

2.4 Last year, UDX confirmed the purchase of the land just south of Bedford town centre with the goal of exploring a potential new ERC at the Site. The proposals then developed further as a result of engagement with DfT, Network Rail, National Highways and EWR and the Site now encompasses the area necessary to deliver the whole ERC.

2.5 UDX currently has five branded resorts across the globe: Universal Orlando Resort, Universal Studios Hollywood, Universal Studios Japan, Universal Beijing Resort, and Universal Studios Singapore. Each of these world-class resorts features thrilling, immersive attractions, exceptional hotel and resort options, unique merchandise, and culinary experiences as well as live and virtual entertainment. UDX design, build and construct attractions and experiences that lead to memorable, and emotionally fulfilling moments for people of all ages. UDX's resorts feature beautifully designed and landscaped areas. These resorts create thousands of jobs, generating significant positive economic impact, both locally and further afield, and are a positive contributor to their local communities. The vision for UDX's UK Project is to deliver these benefits to Bedford and the UK, whilst seeking to minimise impact on the environment and be a good neighbour.

2.6 The Proposed Development would deliver transformative economic benefits to the local area and region. This includes the creation of 8,050 jobs in the first full year of operation, 81% of which are anticipated to be taken by people living in Bedford, Central Bedfordshire, Luton and Milton Keynes. The Proposed Development would support 5,380 direct construction jobs at its peak of the Primary Phase in winter 2029, with many more total construction jobs supported overall.

2.7 The jobs created at the ERC will be wide ranging and varied and will support local people through providing new skills and training opportunities.

2.8 A large share of the jobs on offer at the Proposed Development will have low entry requirements, providing accessible opportunities for those with low/intermediate qualifications. The diversity of jobs on offer will help transform the local economy. Opportunities will be available in distinct and diverse roles, such as lifeguarding, entertainment, food and beverage (F&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.

2.9 The operation and general management of the Proposed Development 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 local area.

2.10 Significant progression opportunities will be available. It is envisaged that promotion to team leader in areas as diverse as F&B, attractions supervision and security would often be dependent on leadership skills, performance in entry-level roles, and the experience gained there. There will not be a barrier in accessing employment opportunities for residents not having a degree-level qualification. UDX has established a reputation for implementing successful employment and training initiatives and intends to collaborate with local government and education and skills providers to launch similar programmes that cater specifically to the local employment and skill needs.

2.11 UDX has a track record of delivering in-work training, apprenticeships, and internships, which will also be delivered at the ERC. These training initiatives to ensure local people can benefit from the opportunities created by the Proposed Development will be delivered by the Employment and Skills Plan **(Document Reference 6.12.0)** submitted with this planning

Case study - Creating a UDX show

The jobs created by a UDX ERC are across a wide range of specialities, with every team member playing their part. This can be illustrated by looking at what goes into making a UDX show happen.

A Universal Studios theme park show - like *The Bourne Stuntacular* - is a highly coordinated production that blends storytelling, cutting-edge technology, and live performance. The creative process begins with writers, directors, and designers developing a concept that aligns with Universal's intellectual properties. Designers then craft physical sets, media content, costumes, and makeup to support the story. Stunt coordinators and performers bring the action to life through choreographed combat, wire work, and precision timing, often synchronized with dynamic stage elements.

Behind the scenes, a range of technical experts contribute to the show's execution. Sound engineers, lighting designers, and projection specialists ensure audio and visual elements are immersive and perfectly timed. Sophisticated control systems automate lighting, sound, animatronics, drones, and special effects - like pyrotechnics and fog. Teams of engineers and technicians maintain these systems daily, while operators and stage managers oversee show flow and safety. The result is a seamless, high-impact experience that merges live performance with advanced entertainment technology.

proposal.

2.12 Evidence from UDX's other theme parks suggests that for every job supported within the parks, at least 1.5 further jobs may be supported regionally in the supply chain and across all areas of the economy. If visitor induced spending is also included, this equates to a multiplier of 3 jobs nationally for every job created. Further information on the socio-economic benefits of the Proposed Development is provided in Chapter 13 of the ES – Socio-Economics **(Document Reference 2.13.0).**

Why the UK?

2.13 UDX's incredible experiences resonate with people of all ages and millions of UK residents travel to their theme parks and resorts around the world every year. UDX is excited by this potential opportunity to bring this world-class experience here for people to enjoy in the UK.

2.14 The UK is a very attractive market for a new theme park experience with its large population, creative industries, strong tourism, transportation infrastructure, and links to the rest of Europe. In 2023, the UK welcomed 38 million tourists, and this number is growing. These visitors are expected to spend approximately £34 billion annually, supporting a wide range of valuable employment opportunities across several sectors.

Why Bedford?

2.15 The Site is located to the south of Bedford town centre, near Kempston Hardwick, and located between the villages of Wixams, Stewartby and Wootton. It includes the former Kempston Hardwick brickworks site, a brownfield site, the redevelopment of which is strongly supported by government policy, as well as some agricultural fields to the south and west. The Site is also in an ideal location with the opportunity for convenient, fast rail links on the Midland Main Railway Line to London and London Luton Airport (see Figure 2). The EWR project also plans to deliver additional local transport improvements to the existing Marston Vale Railway Line. The Site has the size and flat topography that is important for a large-scale destination as well as sufficient space for

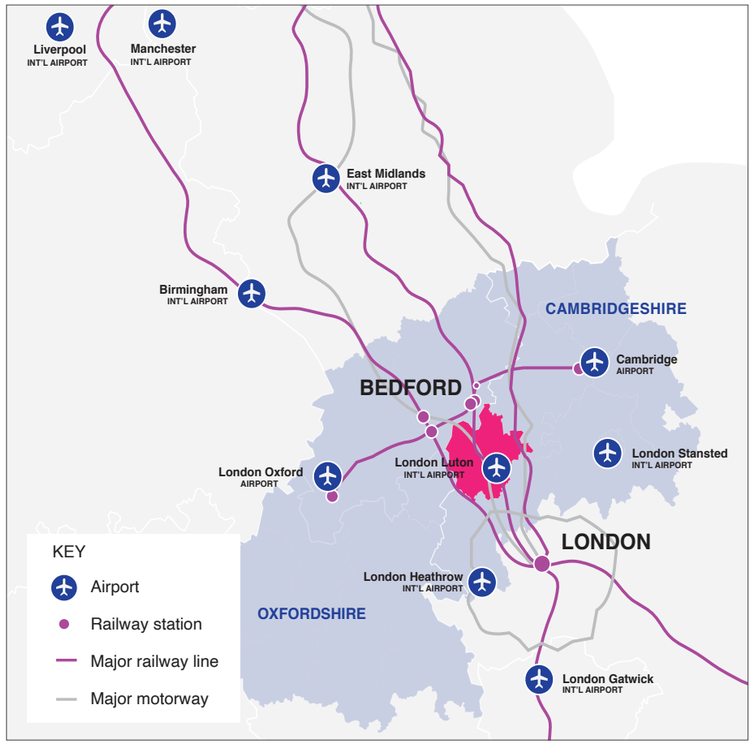


Figure 2: Rail and air connections

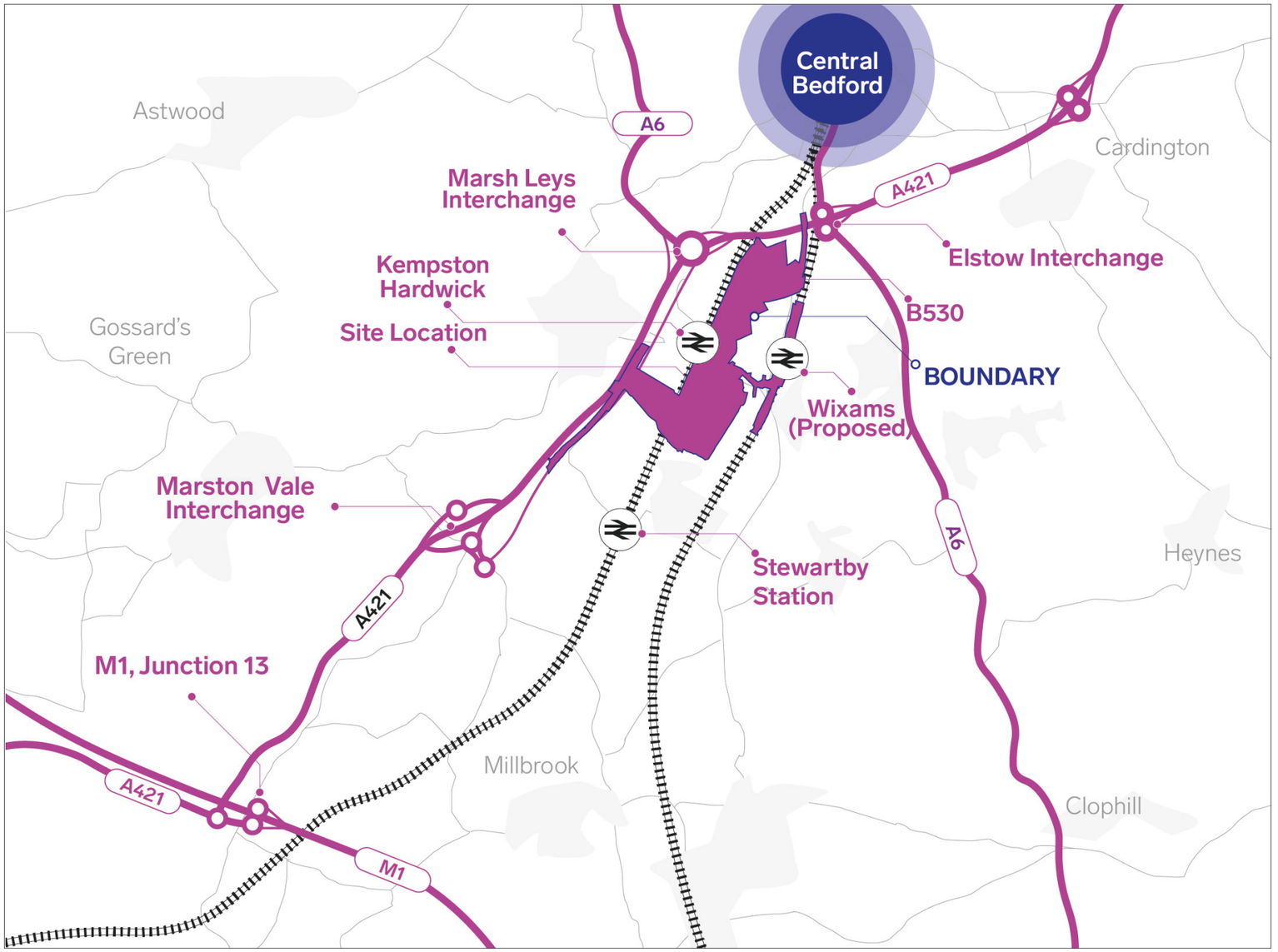


Figure 3: Local context – road and rail connections

support uses. Both the Site and Bedford are well connected for travel from all parts of the UK and beyond.

2.16 Figure 3 illustrates the Site in its local context in relation to transport connections.

3.0 BENEFITS

3.1 The Proposed Development will generate significant socio-economic and environmental benefits for the Bedford area and nationally.

Socio-economic Benefits

3.2 The Tourism Recovery Plan (2021) and Tourism Recovery Plan: Update on Delivery (2023), prepared in response to the COVID-19 pandemic, acknowledge that:

"Tourism is a significant economic, cultural and social asset to the UK. The sector is a powerful engine for economic growth and job creation throughout every nation and region."

3.3 Economic growth within the UK is a key focus at all levels of Government. The Proposed Development will contribute to economic growth through the delivery of significant employment opportunities and infrastructure provision, including:

- 5,380 direct construction jobs created at peak construction.
- 8,050 jobs created in the first full year of operation in 2031.
- A further 1.5 jobs created for every direct job in the first year of operation as a result of the increased local spending and investment in the supply chain.

3.4 The Proposed Development has the potential to support an overall contribution of £35billion net additional GVA (NPV) to the UK economy over a 30-year appraisal period (comprising both construction and the first 25-years of operation) which would inject substantial additional spending into Bedford and the surrounding area's economy, together with a significant boost to the tourism industry of Bedford, the region and the UK as a whole. It is projected that the Proposed Development would generate £14 billion (NPV) in net additional tax returns to HM treasury over the 30-year period.

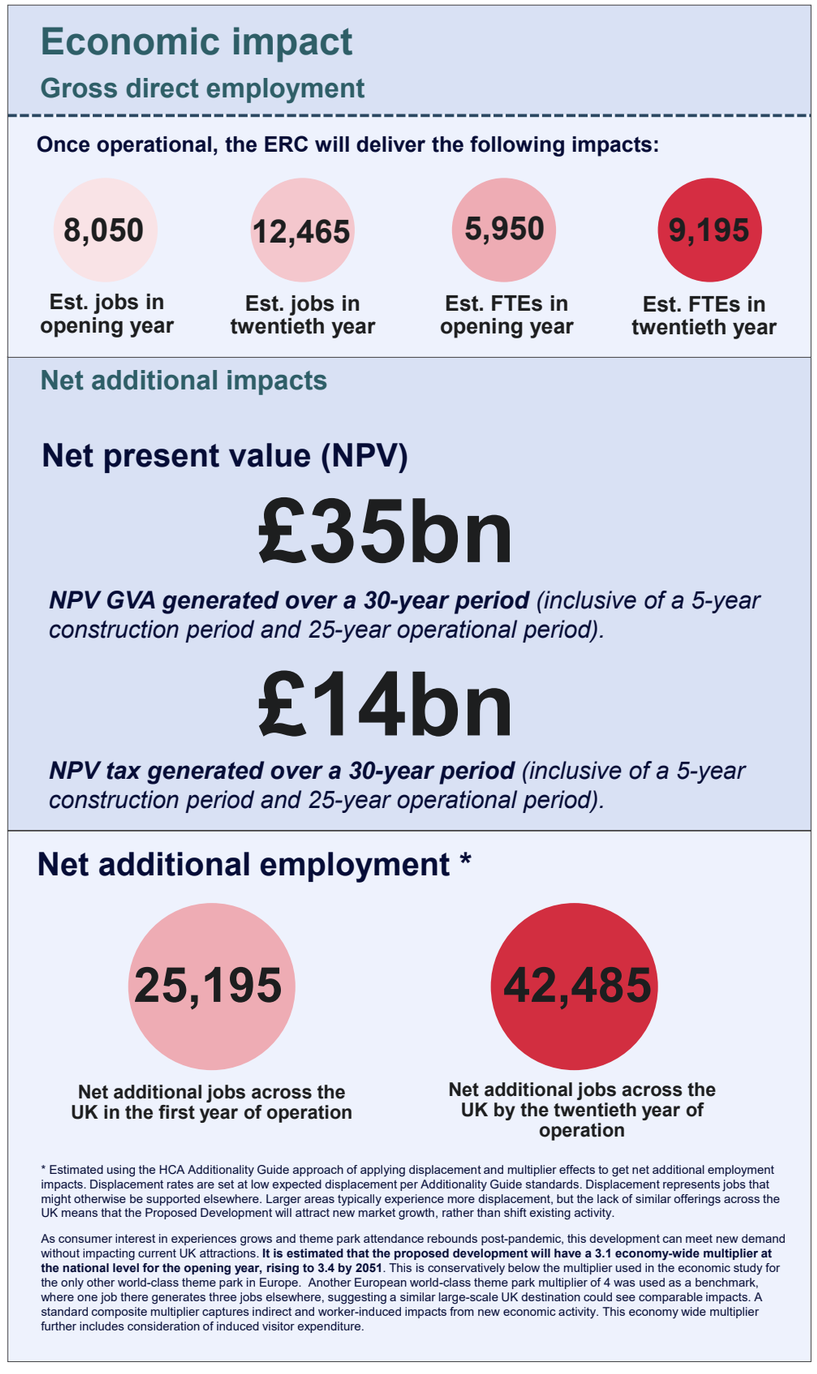


Figure 4: Economic impact

3.5 The Proposed Development will also provide other local benefits including facilitating infrastructure improvements which will deliver local benefits as well as connectivity to the Site:

- The construction of an expanded Wixams Railway Station.
- A new A421 junction.
- An upgraded Manor Road, designed with the ability to tie into whichever solution Network Rail pursue to replace the Manor Road level crossing, with UDX's preferred option being the closure of Manor Road (eliminating the level crossing) and the addition of a new active travel bridge.

3.6 The Proposed Development also safeguards a site for a new station on the EWR line, in close proximity to the ERC, although this is not a central component of the transport vision and the planning proposal includes a fall back option for the area proposed for the station to be a mix of uses if EWR decide not to proceed with a station on the safeguarded part of the Site.

3.7 In addition, the development of the Site provides the opportunity to improve active travel connectivity in the local area, and to connect the Site with Bedford and Wixams. New movement corridors are to be provided within the Proposed Development and will include facilities for active travel users. These will connect with routes beyond the Site where possible. It is envisaged that active travel improvements to enable connections to the villages around the Site including Stewartby and Wootton would be delivered by Bedford BC, but the Proposed Development provides the on-Site infrastructure necessary to enable these connections into the Site.

Environmental Benefits

3.8 The Proposed Development includes the remediation of contaminated land on the northern part of the Site; and significant surface water improvements and diverse habitat enhancement, secured through the Environmental Controls Document **(Document Reference 6.16.0)**.

3.9 Landscaping and greening play an important part in how UDX designs and creates its ERCs. UDX plants thousands of trees and creates green, natural perimeters around its sites to both enhance biodiversity and visually shield local communities. As part of the engagement on the Proposed Development, UDX has engaged with the Forest of Marston Vale about how the proposal might contribute to their policy goals, including environmentally-led regeneration of the Forest of Marston Vale and increasing tree coverage across the Site.

3.10 An example of how UDX delivers significant green infrastructure in its resorts can be seen in the garden walk, which connects Universal Studios in Orlando with the adjoining hotels and provides a beautiful, landscaped walk through shady trees, along a canal (see Figure 1 on page 7).

3.11 There are a number of water bodies within the Site, including part of the former Kempston Hardwick Clay Pits and Elstow Brook. The Proposed Development includes sustainable drainage plans that restrict run off rates to existing levels to minimise flood risk. Further information is provided in the Drainage Strategy **(Document Reference 4.12.3.0)** and Flood Risk Assessment **(Document Reference 4.12.1.0)**.

4.0 SITE OVERVIEW

Site Location and Context

4.1 A plan of the land which the planning proposal relates to is shown in Figure 5 (see Zonal Plan **(Document reference 1.8.0)**). The Site comprises 268ha of land located within the administrative area of Bedford BC**.**

4.2 The residential settlement of Wixams lies to the east of the Site, Wootton to the west, Kempston to the north and Stewartby to the south. The A421 runs along the west of the Site, with Manor Road running through the centre of the Site in an east west direction.

4.3 The area surrounding the Site, in addition to the more residential areas mentioned above, is characterised by the adjacent very large distribution warehouses which benefit from the excellent road transport connections provided by the A421 to the M1. To the east of the Site, on Manor Road, there is an employment area including a large car auction and Cemex cement plant and further north on Ampthill Road there is a concrete factory.

4.4 For the purposes of explaining the Site and its context, the Site has been broken down into four distinct land parcels – the Core Zone, Lake Zone, East Gateway Zone and West Gateway Zone (see Figure 5).

Core Zone – the central portion of the Site comprising primarily agricultural fields bounded to the north by Manor Road, to the west by the existing Marston Vale Railway Line (including the existing Kempston Hardwick rail station), to the south by Broadmead Road and the east by the former Coronation Pits and the Kempston Court industrial area.

Lake Zone – the northernmost portion of the Site comprising the former Kempston Hardwick Brickworks and partially flooded clay pits which is bounded to the west by the existing Marston Vale Railway Line and an area of large warehousing, to the east by the former Kempston Hardwick Clay Pits, an existing employment area including a cement plant, and the B530 (Ampthill Road), to the south by Manor Road and to

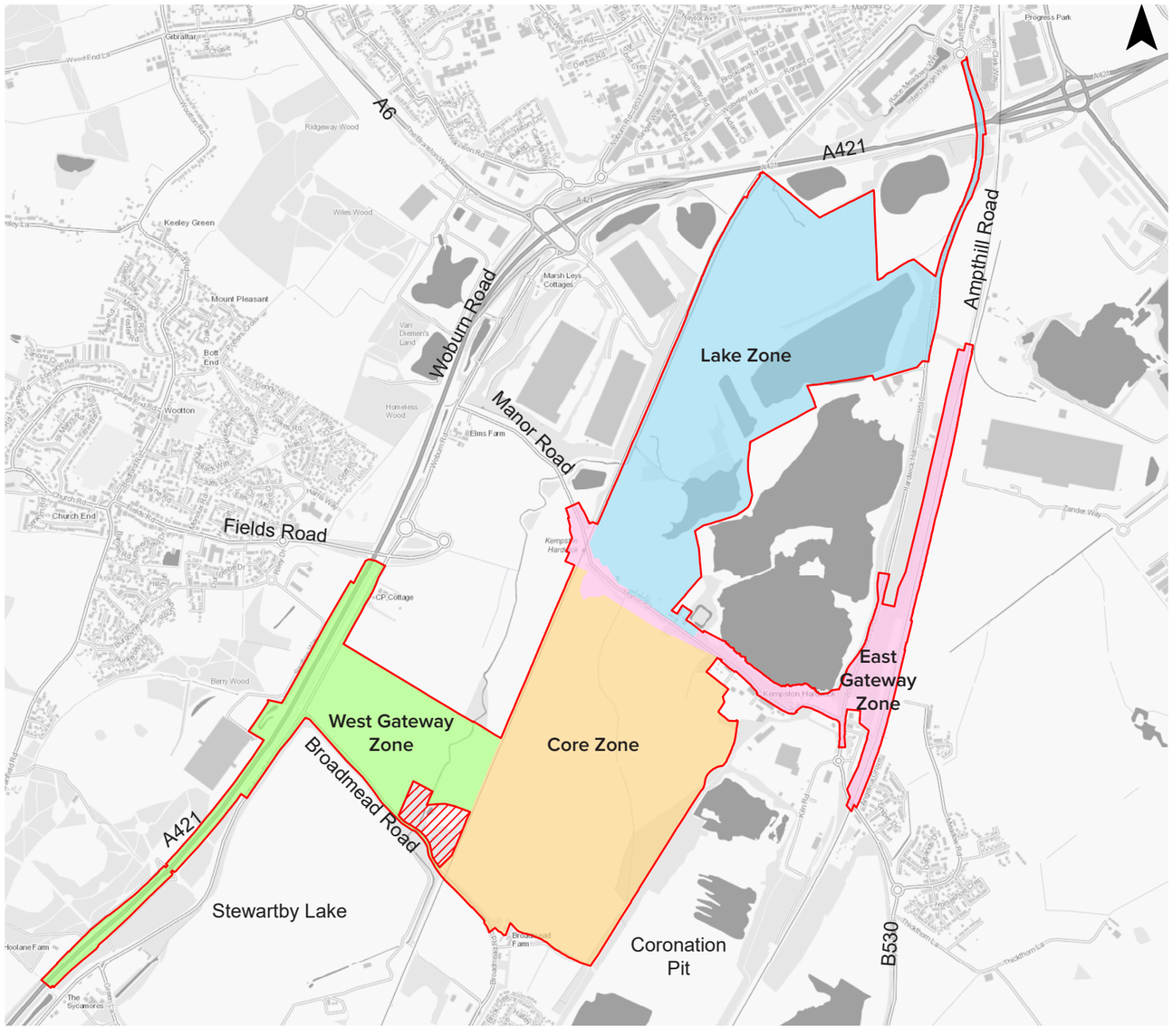


Figure 5: Zonal plan of site (not to scale)

the north by drainage ponds adjacent to the A421.

East Gateway Zone – the easternmost area of the Site comprising an existing wooded area and a partially developed parcel bounded on the west by the B530 (Ampthill Road) and the east by the village of Wixams, with the Midland Main Railway Line serving as the eastern edge of the zone, together with the existing Manor Road right of way and an existing wooded area to the north of the right of way.

West Gateway Zone – the westernmost area of the Site within which the principal access to the ERC via the A421 would be provided comprising an existing agricultural field and bounded to the north by open agricultural fields, to the south by Broadmead Road, and the east by the Core Zone and the Marston Vale Railway Line, with the A421 forming its westernmost extent.

4.5 The following images are some of the areas around the Site which have informed the understanding of the context for the Proposed Development. In some cases, Google images have been used, where it was not possible to take photographs, for example due to safety or privacy concerns.

[1] *Localised surface water in foreground due to very wet weather before site visit.*

Image 1: Core Zone – view looking north from Public Right of Way onto southern boundary[1]

Image 2: Lake Zone – view looking north across former Kempston Hardwick Brickworks

Image 3: Lake Zone – view looking west across former Kempston Hardwick brickworks

Image 4: Manor Road – view from south side of Manor Road looking north to Lake Zone with adjacent cottages in the distance

Image 5: Kempston Court Industrial Estate to north-east of Core Zone

Image 6: Housing and play area at Meadow Road, Wixams (approximately 530m from boundary of East Gateway Zone)

Image 7: Goodman Bedford Commercial Park warehousing to west of West Gateway Zone (image copyright of Google, June 2023)

Image 8: BCA car auctions, Kiln Road, north-east of Core Zone

Image 9: Brick Crescent, Stewartby beyond fields to south of Core Zone (image copyright of Google, June 2023)

Image 10: Individual residential property to south of Core Zone, Broadmead Road

Figure 6: Approximate location of site photos taken (not to scale)

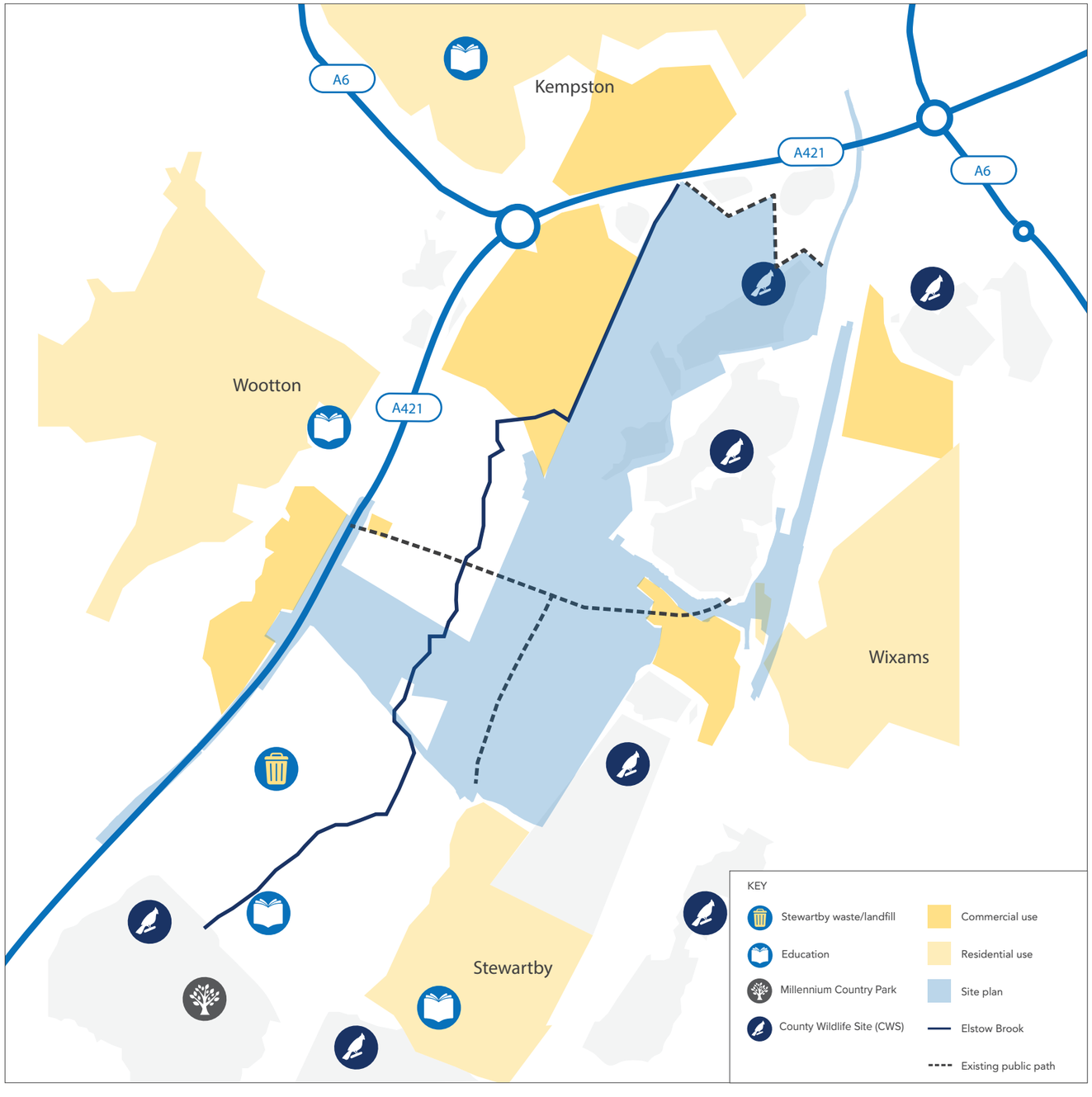


Figure 7: Context analysis (not to scale)

4.6 A review of the Site and its surroundings, and the undertaking of numerous site visits, have informed the Promoters' overall understanding of the location, which has in turn informed the design development to date and will continue to inform the development of detailed design. This contextual analysis is described and shown graphically on Figure 7. Further detail, including precise boundaries for allocations, can be found in the relevant topic chapters in the ES.

4.7 Environmental considerations which have informed the Promoters' understanding of the Site and its surroundings are described in more detail in the ES and summarised below.

Land Use

4.8 The Site lies within the Marston Vale which was formerly home to numerous brickworks and associated former claypits. The land use in the immediate area is heavily influenced by this history, with a number of the former clay pits now identified as County Wildlife Sites (CWS), adjacent to the Site boundary, and others now being used for landfill. Stewartby, to the south of the Site was originally a model village, built for workers of the London Brick Company, and has been extended to the north in recent years. Other residential areas within the wider area include the new settlement of Wixams, focused on the proposed new train station site to its west, Kempston to the north and Wootton to the west. The A421 forms a key arterial route cutting through the area, with large warehousing developments, and other industrial uses, located adjacent to it, to take advantage of the access it provides to the A1 and M1, and beyond.

Transport and Access

4.9 The Site and its surroundings would benefit from easy connection to the strategic road network via the proposed new A421 junction. The Site is also located between two railway lines (the Midland Main Railway Line to the east and Marston Vale Railway Line to the west) providing opportunities for connection into the railway network.

4.10 The design of the Proposed Development has therefore carefully considered how to optimise the accessibility

presented by these transport links whilst responding to the constraints and sensitivities of the Site and the need for an efficient layout.

4.11 There are currently four bus services operating within the vicinity of the Site – the 68, 42, 2 and C10/C11 (see Table 3).

4.12 According to the Bedford BC Rights of Way Map, there are two Public Rights of Way (footpaths number 1 and 2) crossing the Core Zone, and two linked Public Rights of Way (A1 and 8) to the north of the Lake Zone. The constraints posed by these PRoW and the need to preserve connectivity across the southern parcel of the Core Zone have been an important consideration in the formulation of the Proposed Development.

Ecology

4.13 Neither the Site nor its close surroundings are subject to any international or national ecological designations. As noted above, the principal ecological features in proximity to the Site are the CWS, with the Kempston Hardwick CWS located partly within the Lake Zone boundary, which provide opportunities for providing ecological enhancement as well as providing a potential constraint to development. The Elstow Pit CWS lies outside of the Site to the east, above Wixams, and Coronation Pit CWS lies to the east and partly within the Core Zone. Beyond this to the south are Quest Pit, Rookery Clay Pit and Stewartby Lake CWS.

4.14 The closest SSSI lies 2.3km to the southeast of the Site. Further information on the ecological context is provided in Chapter 6 of the ES – Ecology and Nature Conservation **(Document Reference 2.6.0).**

Landscape

4.15 The Site is located within the wider Forest of Marston Vale allocation in the adopted Bedford Local Plan 2030, which covers 21 square miles between Bedford and Milton Keynes, with the wider aim to achieve environmentally-led regeneration – using extensive tree planting to transform the landscape, and in turn transforming perceptions of the area, and transforming social and economic prospects.

4.16 The topography of the Site is influenced by its location in the basin of the River Great Ouse, with an elevation around 30-35m Above Ordnance Datum (AOD), and gently rising towards the south of the Site. Former clay pits (most of which are flooded, or partially flooded) within and immediately adjacent to the Site form some extensive bodies of water in the north of the Site. Elstow Brook and an unnamed stream flow north to south across the southern part of the Site.

4.17 To the north of Manor Road are linear blocks of woodland surrounding the distribution warehouses in the Marsh Leys industrial estate. There is a mosaic of woodland, scrub and larger areas of open water formed by the flooded clay pits. Immediately adjacent to Manor Road and the Marston Vale Line are the remnants of a former industrial site, the only remaining built form being a single red brick building and areas of hardstanding, whose former use was associated with the Kempston Hardwick Brickworks, which are slowly being colonised by scrub. There are linear belts of trees close to the eastern boundary of the Site along the B530 Ampthill Road and sizeable areas of vegetation around the flooded clay pits.

4.18 To the south of Manor Road, there is a belt of trees along the south side of the road, and south and west of Kempston Court and the BCA Bedford site. The southern portion of the Site is characterised by agricultural use comprising small to medium-sized fields, scattered pockets of woodland and field boundary hedgerows. More substantial woodland exists on the eastern edge of the Site and forms a strong landscape feature, east of which is open water and wet woodland to the north of Stewartby. Further information on the landscape context can be found in Chapter 7 of the ES - Landscape and Visual **(Document Reference 2.7.0).**

Table 3: Existing Bus Routes

Number	Route	Frequency
68	Runs along the C94 Woburn Road from Bedford and then carries on along Broadmead Road and Stewartby Way to serve Stewartby, before joining the B530 south to Ampthill.	Services run hourly Monday to Saturday. In the peak hours, services stop and depart from Stewartby only.
42	Runs between Bedford and Toddington, down the B530 via Houghton Conquest, Ampthill and Flitwick.	It provides an hourly service Monday to Saturday. Monday to Friday only a few services link to Dunstable.
2	Runs between Bedford and Flitwick along the B530	The service runs at an hourly frequency Monday to Saturday, with Sunday services running hourly between Bedford town centre and the Interchange Retail Park.
C10/C11	Runs along Bedford Road between Bedford, Cranfield University and Milton Keynes.	Runs at an hourly frequency during Monday-Friday, and 2 hourly Saturday and Sunday.

Cultural Heritage

4.19 The Site does not contain any nationally or locally designated (protected) heritage assets, such as scheduled monuments or listed buildings, nor does it fall within a Conservation Area. However, there are above ground heritage assets in the environs, outside of the Site, that are potentially impacted through changes to their setting. There are numerous heritage assets identified within a 5km study area from the Site and these are detailed in Chapter 10 of the ES – Cultural Heritage **(Document Reference 2.10.0)**. The closest designated heritage asset to the Site is the Kempston Hardwick moated site which is a medieval moated enclosure and scheduled monument. This lies outside of the Site boundary immediately to the east of the Lake Zone on Manor Road. Further afield, there are longer distance views of the Site from Houghton House a Grade I listed building approximately 3.5km to the south-east of the Site, and other heritage assets on the Greensand Ridge to the east.

5.0 DESIGN VISION AND APPROACH

Vision

5.1 Developing a world-renowned Universal ERC takes years of creative ideation, rigorous planning, and committed partnerships with governments and local communities. UDX's government partners around the globe recognise that achieving a world-class destination is a joint endeavour. This starts with an efficient planning process that can adapt to new technologies, methods and scales of investment. It also involves infrastructure investment to accommodate the enhanced levels of tourism generated by these transformative projects.

5.2 Whether they choose to arrive via roadway, rail or cycle, guests will be welcomed to the resort through an environment that has been carefully curated to include scenic landscaping, lighting, signage, and intuitive wayfinding that seeks to quickly transition them from their mode of arrival and into the pedestrian realm.

5.3 Once there, guests are surrounded by a cohesive design consisting of layered landscaping, gardens and promenades, as well as plazas and fountains that create areas of respite along the way to the entrance of the Theme Park, while at the end of the day they serve as a means to decompress within a calm and serene environment.

5.4 This space also serves as the connective tissue between all modes of arrival and the security hub—through which all guests must pass. An important component to the safety of UDX guests and team members, the security hub becomes the portal that transitions from the serene and natural environment of arrival into a much more festive and exciting area rich with food and drink, retail, and entertainment offerings. Lights, music, and a heightened level of energy prepare visitors for the theme park experience in the morning and extend their stay into the evening with specialty restaurants, live entertainment and retail experiences.

5.5 The entrance to the gated portion of the ERC is accessed through ticketing and turnstiles adjacent to this space. This portal will be celebrated as a special entry experience through distinctive thematic elements which express the Universal image. From there, guests fully experience the immersive environments and diverse spaces that they have come to expect from a Universal destination.

5.6 The Theme Park will comprise different lands that are made up of a distinctive blend of landscape, hardscape and architectural character seamlessly woven together to tell a story and transport guests to imaginative worlds. These lands once again focus on the pedestrian scale to create the emotional connection to each story but also include occasional long-range vistas across the park and attraction components that punctuate the skyline. These elements serve as intuitive guideposts leading guests around the Theme Park with a sense of discovery and exploration.

5.7 Unique and exciting destination experiences are dynamic in nature, constantly evolving to provide new and exciting offerings to drive continued interest and repeat visitation. As visitation grows and diversifies, the resort will flexibly adapt and expand by implementing new amenities or refreshing experiences through new technologies and creative design solutions. UDX looks to increase its resort offerings beyond the core components of its theme park and entertainment experiences as part of its operating model in order to extend guest stays. These may include additional overnight accommodation and retail, dining and entertainment, event, and community spaces, or other interactive experiences across the remainder of the Site, which develop organically over time. The planning proposal contemplates this long-term growth; and the design of the infrastructure, including roadways, utilities, and environmental components ensure that this vision can be realised safely and competently.

5.8 UDX has developed this vision into a single statement which will guide the design of the ERC:

"To provide a world-class Entertainment Resort Complex which creates immersive, memorable and emotionally thrilling moments for people of all ages that are accessible through a range of transport modes, including road and rail, that generates significant economic benefits, both locally and further afield and seeks opportunities for local environmental enhancements."

Design Approach

5.9 To reflect the evolving nature of the ERC and that many design decisions have not yet been taken, a flexible approach to design is proposed and supported by the EIA which assesses a cautious worst case scenario, as detailed in Chapter 3 - Approach to EIA **(Document Reference 2.3.0)** of the accompanying ES.

5.10 On this basis, detailed design approval is not included in these materials for any element of the Proposed Development.

5.11 The Proposed Development will be controlled by Operative and Controlling documents, including the Design Standards, all of which are for approval as part of any planning permission granted (see Section 10.0 of this DAS). Together with the proposed Description of Development **(Document Reference 1.9.0)**, these control the development which could come forward under any planning permission granted.

5.12 This DAS sets out the proposed post-decision approval process at Section 10.0. This process would ensure that the decision-maker has the appropriate level of control over the final appearance of the Proposed Development, whilst enabling sufficient flexibility. The proposed post-decision approval process envisages that Zonal Masterplans and Zonal Design Standards would be approved for relevant parts of the Site (other than the Inner Core Zone), to ensure good design.

5.13 Approval is not sought at this stage for design in relation

to external appearance, with the exception of parameters for height and the articulated skyline, but the approval of Zonal Design Standards (for all areas other than the Inner Core Zone), submission of Compliance Plans and/or detailed design approval will enable sufficient control over appearance.

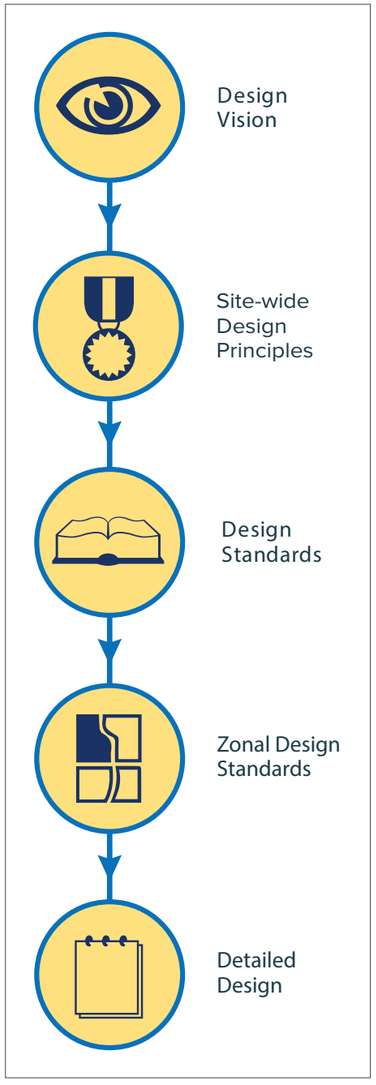


Figure 8: Design process

5.14 UDX has developed the following Site-wide design principles (Figure 9), which will be used to guide the development of Zonal Design Standards, and has also informed the approach to Green Infrastructure:

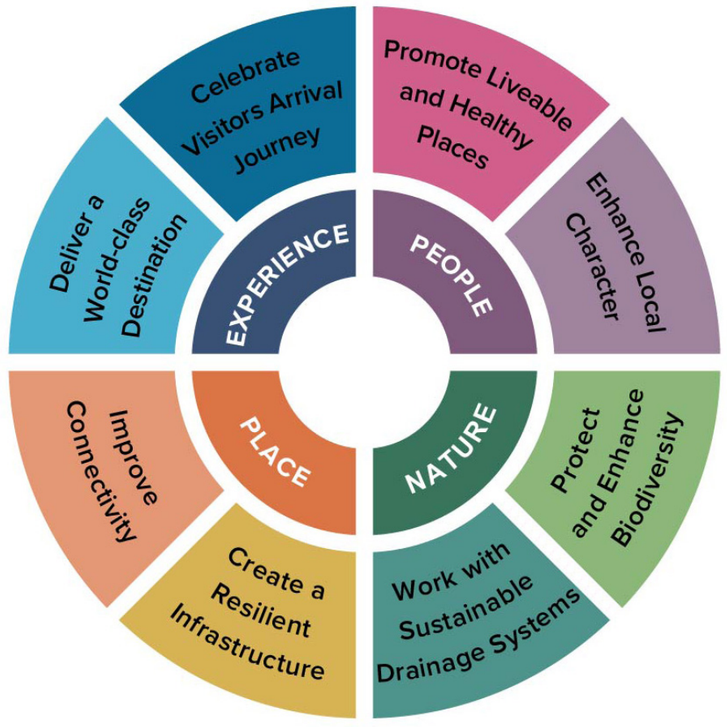


Figure 9: Site Wide Design Principles

Deliver a World-class Destination

5.15 The Proposed Development will create a world-class destination that seamlessly integrates diverse experiences for local, regional, and international guests. By offering a dynamic blend of cultural, recreational, and hospitality spaces, the development will enhance visitor engagement while fostering social and economic vibrancy.

5.16 Thoughtful design and high-quality placemaking will ensure a destination that is accessible, inclusive, and globally recognised for its unique character and appeal.

Celebrate Visitors' Arrival Journey

5.17 The Proposed Development will prioritise a seamless and intuitive arrival experience, creating a welcoming and memorable journey for all visitors. By integrating clear wayfinding, engaging landscapes, and a thoughtfully designed circulation network, the arrival sequence will enhance guest comfort and connectivity.

5.18 This approach will establish a sense of place from the moment of arrival, ensuring a cohesive and immersive experience throughout the destination.

Promote Liveable and Healthy Places

5.19 The Proposed Development aims to support active lifestyles and enhance community cohesion, providing accessible & inclusive places for people that are legible and well-connected. Encouraging greater visitor numbers from all sectors of the wider community will improve passive surveillance.

5.20 The Proposed Development envisions creating dynamic spaces for people while also incorporating nature, ensuring a balance between urban development and green infrastructure.

Enhance Local Character

5.21 The Proposed Development will celebrate the local character by revealing and conveying the diverse and unique qualities of the area through interpretation, materials and colour for example. This will help to foster pride for local

communities and enhance visitor experience.

5.22 The design will establish clear and distinctive characteristics that help to establish engagement and connection; referencing natural and cultural heritage for example will create a richer and more meaningful experience for all.

Protect and Enhance Biodiversity

5.23 The Proposed Development will protect and enhance biodiversity by improving the natural environment as a whole within the Site, delivering multiple benefits where possible. These include creating new habitats and ecological networks, supporting climate adaptation with resilient planting and vegetation, improving air quality and reducing pollution with tree canopy cover, and promoting healthier lifestyles through active travel networks.

5.24 Integrating an ecologically informed design principle will ensure that urban greening initiatives offer sustainable and thriving habitats for biodiversity throughout the Proposed Development.

Work with Sustainable Drainage Systems

5.25 The Proposed Development will incorporate sustainable drainage systems to effectively manage stormwater runoff and mitigate flood risk while reducing economic impacts by managing surface water at its source, in turn reducing dependency on large scale drainage infrastructure. Designed to respond to climate change, the Proposed Development will dynamically absorb and adapt to environmental changes.

5.26 This approach will not only improve water quality but also provide a cost-effective and environmentally sustainable solution.

Create a Resilient Infrastructure

5.27 The Proposed Development aims to create a sustainable and resilient infrastructure that responds to environmental challenges while supporting thriving communities. The design will contribute to the UK's trajectory towards net zero by reducing energy emissions, capturing carbon, and integrating circular economy practices to minimise environmental impact.

5.28 Additionally, enhancing seamless and sustainable mobility options will contribute to a more adaptable and future-ready infrastructure.

Improve Connectivity

5.29 The Proposed Development will provide for enhanced connections within the Site. This will benefit both people and wildlife by promoting active travel, improving quality of life, and supporting physical and mental well-being for visitors and local communities.

5.30 Additionally, the Proposed Development will strengthen ecological connectors, preserving and enhancing vital natural connections to support biodiversity and maintain a healthy ecosystem.

5.31 These Site-wide design principles are intended to ensure that the Proposed Development achieves good design, respects its neighbours and the environment and, where possible, delivers local and regional benefits whilst creating a positive legacy for the future. The Zonal Design Standards will be cognisant of these principles.

6.0 PROPOSED DEVELOPMENT

6.1 This section of the DAS explains the Proposed Development at a high level. For a full description of the Proposed Development, reference should be made to Chapter 2 of the ES – Project Description **(Document Reference 2.2.0).**

6.2 Any planning permission granted would permit a range of uses to happen within the ERC together with utilities, roads and rail-related development, as well as the use of land necessary to support construction. The permitted uses are set out in Description of Development **(Document Reference 1.9.0)** and replicated in Table 4 on the following page.

6.3 The planning proposal is also accompanied by a series of plans which control the geographical extent and location of certain components of the Proposed Development as follows:

- Primary Access Plan – shows the location of the primary access points for the Proposed Development in relation to the existing highway network.
- Zonal Plan – shows the geographical extent of the Core Zone, Lake Zone, West Gateway Zone, and East Gateway Zone.
- Parameter Plans – set the physical envelope for development:
  - Entertainment Resort Complex Land Use
  - Access and Roadways
  - Active Travel
  - Core Zone Transport Hub
  - Utility Compound
  - East West Rail Safeguarded Land

6.4 Furthermore, the Proposed Development is also proposed to be subject to controls in the following Controlling Documents and proposed conditions:

- Travel Plan
- Design Standards
- Security and Emergency Management Plan
- Environmental Controls Document
- Land Use Limitations Table
- Dependencies Table

Table 4: Summary of Proposed Development

Development Component	Description of Development
Entertainment Resort Complex	• Theme Park(s), amusement park(s) and/or water park(s), including indoor and outdoor: o Rides, attractions, games and pools. o Events spaces. o Parades, shows and displays. • Visitor accommodation, including hotels, camping and caravaning. • Vehicle hire facilities. • Indoor and outdoor entertainment venues, including: o Theatres. o Cinemas. • Indoor and outdoor sport, recreation, leisure and spa facilities. • Venues with conference and/or convention spaces. • Retail, dining, and entertainment, including music and dance venues, nightclubs, hot food takeaways, restaurants, drinking establishments, shops, cafes and tattoo parlours. • Indoor and outdoor cultural facilities, including exhibition spaces, art galleries, museums and prayer rooms. • Vehicle showrooms. Associated services and uses for any operational or administrative functions Entertainment Resort Complex support, including: • Offices, including call centres. • Warehousing and storage, including refrigerated areas, logistics delivery facilities, loading docks, and parade float storage. • Light industrial and research and development. • Media and film production facilities and uses. • Workshops and maintenance facilities. • Estate management and maintenance, including servers, laboratories and a horticultural nursery. • Changing facilities. • Entertainment rehearsal facilities. • Mail facilities. • Staff welfare facilities including training and education, and financial services facilities. • Training and education outreach facilities. • Food preparation and catering use. • Medical facilities. • Driver welfare facilities. • Laundry facilities.

Entertainment Resort Complex	• Facilities for the care of cats and dogs for visitors, staff and security purposes. • Hazardous substance storage, including fuel, pyrotechnics, fireworks, and chemicals. • Emergency services and security facilities and infrastructure. • Support facilities, including service yards, loading bays, and waste storage and collection facilities. • Communications infrastructure including towers, antennas, small wireless facilities, two-way radio, distributed antenna system and other similar communications facilities. Utility generation, storage, collection, treatment and processing facilities associated with the Entertainment Resort Complex, including: • Electricity generation and storage apparatus, including renewable generation (including solar panels and battery storage) and back-up generation. • Water collection, processing facilities and storage. • On-site energy centres providing source of networked heat and cooling including heat pumps, electric gas boilers, thermal storage and electric chillers. • Associated buildings, structures, equipment, and metering. Vehicle parking, maintenance and servicing and transportation hubs, including: • Covered and uncovered vehicle parking areas including multi storey car parks. • Vehicle pick up and drop off, including parking and associated infrastructure for buses, coaches, taxis, ride shares and service vehicles. • Facilities for servicing, maintaining, valeting, testing and fuelling vehicles, including electric and other charging facilities. Access routes and circulation spaces, including: • Internal roads. • Vehicular bridges. • Pedestrian and cycle access and infrastructure, including footpaths, footways, cycleways, walkways (including covered, uncovered and moving), stairs, ramps, lifts, escalators, bridges and underpasses. • Traffic signals. Landscaping, including: • Structures associated with signage including gantries. • Lighting including floodlighting. • Noise attenuation. • Gates, fences, walls, retaining walls, and other means of enclosure. • Traffic control devices. • Security infrastructure. • Public art. • Visitor facilities including seating, kiosks, ticketing points, ticket machines, ticket barriers, turnstile structures, booths, stalls, canopies and other ancillary infrastructure. • Street furniture.

Entertainment Resort Complex	• Wildlife crossing structures. • Trees, shrubs, grassland, hedge planting and verges. • Ecological mitigation, habitat, and biodiversity enhancement. • Drainage and attenuation works, including swales, channels, fountains, lakes, lagoons, ponds, and watercourses.
Utilities	Utility infrastructure provided in connection with the Entertainment Resort Complex, Roads and/or Rail-related development, including: • Electricity distribution infrastructure, including substations, transformers and cables. • Water (potable and non-potable) and wastewater (surface and foul) conveyance infrastructure, including pipes, pumping stations, culverts and stormwater ponds. • Natural gas conveyance apparatus, including pipelines and above ground installations. • Communications infrastructure, including cables and above ground installations. • Associated buildings, structures, equipment and metering. • Support facilities associated with the provision of such utility infrastructure, including service yards, maintenance facilities, welfare facilities, water storage, and waste storage, sorting and collection facilities.
Roads	Roads, routes and associated infrastructure, including: • Roads. • Bridges. • Pedestrian and cycle routes including stairs, ramps and underpasses. • Realignment, reconstruction, alteration and improvement of existing roads, junctions, footways and cycleways. • Signalisation works. Landscaping, including: • Structures associated with signage, including gantries. • Lighting including floodlighting. • Noise attenuation. • Gates, fences, walls, retaining walls, and other means of enclosure. • Traffic control devices. • Security infrastructure. • Street furniture. • Wildlife crossing structures. • Trees, shrubs, grassland, hedge planting and verges. • Ecological mitigation, habitat, and biodiversity enhancement. • Drainage works including swales, channels, fountains, lakes, lagoons, ponds, and watercourses.

Rail-related development	Railway station, railway crossings and transportation hubs with associated services and infrastructure including: • Station buildings on the Midland Main Railway Line. • Four railway platforms on the Midland Main Railway Line. • Track, gantries and other operational and supporting rail infrastructure, including communications infrastructure, electric multiple unit power infrastructure, and signalling. • Retail and dining, including hot food takeaways, restaurants, shops and cafes. • Offices. • Driver and staff welfare facilities. • Vehicle parking, maintenance and servicing, including: o Covered and uncovered vehicle parking areas including multi storey car parks. o Vehicle drop off and pick up, including parking for buses, coaches, taxis, ride shares and service vehicles. o Facilities for servicing, maintaining, valeting, testing and fuelling vehicles, including electric and other charging facilities. • Roads and vehicular bridges. • Pedestrian and cycle access and infrastructure, including bridges, underpasses and lifts. • Traffic signals. Landscaping, including: • Structures associated with signage including gantries. • Information boards and associated structures. • Lighting including floodlighting. • Noise attenuation. • Gates, fences, walls, retaining walls, and other means of enclosure. • Traffic control devices. • Security infrastructure. • Public Art. • Visitor and passenger facilities and infrastructure, including seating, kiosks, ticketing points, ticket machines, ticket barriers, turnstile structures, booths, stalls, canopies, platform enclosures and other ancillary infrastructure. • Street furniture. • Wildlife crossing structures. • Trees, shrubs, grassland, hedge planting and verges. • Ecological mitigation, habitat, and biodiversity enhancement. • Drainage works including swales, channels, fountains, lakes, lagoons, ponds, and watercourses.
Construction	Use of land necessary to support construction, including: • Soil and spoil storage. • Construction compounds and storage. • Construction related buildings and structures, including offices, welfare facilities, medical facilities and temporary worker accommodation. • Storage of cement and other materials for use in construction, including mixing equipment, silos, above ground storage tanks, sand and aggregate storage.

Construction	• Concrete, rock, limestone and brick crushing and grinding facilities. • Vehicle parking. • Secure plant and equipment storage areas. • Hoardings, fencing, screening, gates, and other means of enclosure. • Site security and access control, including turnstile structures, gates and other ancillary infrastructure. • Waste storage, reclaim and reuse collection facilities. • Bunds, embankments, and earthworks retaining structures. • Lighting. • Structures for signage and information boards. • Vehicle staging area. Building engineering or other operations, including: • Soil and spoil removal. • Preparation of concrete and other materials for use in construction. • Erection, installation, provision, extension and alteration, including of buildings, facilities, structures, plant, equipment and machinery. • Demolition and removal, including of buildings, facilities, structures, plant, equipment and machinery. • Vegetation clearance. • Site investigation, including site surveys, monitoring, ground investigation and soil investigation works, bore holes, and trenching. • Archaeological investigation, trenching, preservation, excavation, and removal. • Remediation, decontamination and stabilisation works, including removal of hazardous substances. • Reinstatement works. • Land raising and lowering. • Laying down of construction access roads and tracks, ramps, means of access, footpaths, crossings of watercourses, and roads. • Improvements to existing roads. • Works to place, alter, divert, relocate, protect, remove or maintain the position of apparatus, services, plant and other equipment in, on or under the land, including mains, sewers, drains, pipes, conduits, pumps, lights, cables, fencing and other boundary treatments and apparatus. • Noise attenuation. • Horizontal directional drilling and earthworks. • Site contouring. • Permanent and temporary stopping up of footpaths. • Ecological management and mitigation, including habitat protection and species relocation. • Water supply works, drainage provision, and foul water and surface water management systems, including sustainable drainage systems, attenuation, culverting, outfalls, and irrigation and water quality infrastructure. • Alteration of watercourses and drainage features.

7.0 PUBLIC ENGAGEMENT AND DESIGN EVOLUTION

7.1 UDX carried out a period of public engagement for 28 days starting 11th April 2024 and ending on 3rd May 2024, which invited views on the Proposed Development as a whole, including the proposed transport infrastructure. The results of this engagement are provided in the Public Engagement Report **(Document Reference 6.5.0)**. In summary, 92% of people who responded supported a Universal theme park and resort on this Site.

7.2 For the main public engagement, around 7,700 local addresses were sent a promotional flyer, and two public events were held which welcomed 1,478 attendees. 5,979 individuals have signed up for regular updates as part of a dedicated project mailing list moving forward.

7.3 UDX also launched and has kept updated a bespoke project website to provide an online resource for people to access the latest information about the project, which was visited by over 18,000 people during the engagement period in April – May 2024. The website includes contact details (a freephone number and email address) for general queries from the public, and 145 calls and emails were received during the engagement period.

7.4 Feedback was collected thorough a range of different methods, including 6,111 surveys that were completed during the public engagement period between April and May 2024, and the 115 meetings that have been held with key stakeholders since September 2022.

7.5 There was also a freeform questionnaire to enable people to share other feedback. This feedback is summarised, analysed and presented in the Public Engagement Report **(Document Reference 6.5.0)** submitted with this proposal.

Engagement with Statutory Consultees and Key Stakeholders

7.6 UDX has been working closely with Bedford BC, to inform the EIA, and to develop the Employment and Skills Plan **(Document Reference 6.12.0)**, to ensure that the local population are well placed to benefit from the opportunities created by the Proposed Development. This has included several topic-specific meetings, which included attendance from representatives of education and employment groups, voluntary and religious organisations and the blue light services. UDX will continue to work closely with Bedford BC as the detailed proposals are developed. Further information is provided in the Public Engagement Report **(Document Reference 6.5.0)** and Environmental Statement.

7.7 UDX has also been working closely with the relevant organisations and stakeholders, including the DfT, National Highways, Bedford BC and EWR, to understand the potential impact on local transport infrastructure. This engagement has informed the design approach to, and the design of, the project.

7.8 The road and rail elements of the Proposed Development have been developed in conjunction with National Highways, Network Rail and EWR. UDX has been working collaboratively with DfT and National Highways to develop the transport model, to ensure that the traffic effects of the Proposed Development are properly understood and appropriately mitigated. Further information is provided in the Public Engagement Report **(Document Reference 6.5.0)** and Environmental Statement.

7.9 Since the announcement in April 2025 that UDX intends to build and operate the company's first-ever theme park and resort in the United Kingdom, located in Bedford, pending planning consent approvals, UDX has re-engaged with key statutory consultees to agree Summaries of Agreed Position (SoAPs). Copies are provided at Appendix 4 of the Planning Statement **(Document Reference 6.1.0)**.

Engagement on Access Issues

7.10 The public engagement included information on UDX's approach to accessibility and inclusion. A copy of the board from the exhibition is provided at Figure 10 (overleaf).

7.11 The public engagement exercise included a survey that sought input from the public on questions relating to design and access including seeking views on:

- What the most important considerations were for people including environmental considerations and improving public walkways and cycle paths;
- Local infrastructure upgrades; and
- Planting new trees, creating new habitats for wildlife and providing natural screening.

Design Changes Following Engagement

7.12 Section 6 of the Public Engagement Report provides responses to key feedback themes from the engagement. The following principal changes were made as a result of feedback from the public engagement and ongoing engagement with bodies such as the Internal Drainage Board ("IDB"):

- Developing a comprehensive approach to Green Infrastructure in collaboration with Natural England and the IDB.
- Surface water management strategy developed in close engagement with the IDB.
- Incorporation of further areas of ecological enhancement to allow for habitat creation and enhancement.
- Provisions in the Construction Traffic Management Plan to respond to concerns raised regarding potential disruption during construction.
- Controlled opening hours to the public for the Theme Park/Water Park/Amusement Park ticketed area, other than for certain periods whilst enabling the park to deliver its key offerings, e.g. Halloween Horror Nights, to

respond to concerns regarding potential operational noise.

- Increased landscaping to south of the Site to provide further screening to residents of Stewartby and increased perimeter planting.
- Commitment to achieve LEED Gold (rather than just an aspiration) for the design and operation of the Theme Park, in response to comments that the project should be as sustainable as possible.
- Addition of a signalised junction at Broadmead Road and Woburn Road.

Figure 10: Public information board on UDX approach to access and inclusion

8.0 DESIGN COMPONENTS

8.1 This section of the DAS describes the components of the Proposed Development, in relation to use, amount of development, layout, scale of buildings and structures, appearance and approach to landscaping and biodiversity.

Use

8.2 Any planning permission granted would permit a range of uses to happen within the ERC together with utilities, roads and rail-related development, as well as the use of land necessary to support construction. These uses are listed in Table 4 in Section 6.0 of this DAS.

Multi-functional spaces

8.3 As explained in the Planning Statement, the ERC is a single composite mixed use and forms a single planning unit.

8.4 It is important to the success of the ERC that flexibility is maintained to deliver any or all of the uses authorised within the ERC throughout the lifetime of the Proposed Development and to maintain flexibility to deliver a number of different uses within each building, as well as changing the use of buildings within the ERC from one use to another, as long as they fall within the uses to be permitted as part of the ERC by the planning permission that may be granted. This is important to UDX's operating concept, where, for instance a building may be used as a sound stage, film studio, event space or hosting a UDX show or even a mixture of these uses, depending on demand at a particular point in time.

8.5 Multi-functional spaces are built for efficient utilisation between a variety of uses such as Theme Park, operations, and future development testing which typically occur at different times of the day or year (nightly / temporary / seasonal durations).

8.6 UDX has implemented multi-functional spaces at its ERCs through the development of sound stage facilities. These structures are designed for versatility due to the large interior spaces and the ability to control thematic environments (lighting, sound, set structures). The Theme Park may utilise these spaces for private parties, special ticketed events (such as Halloween Horror Nights or Fan Fest Nights) or shows. The resort operations may use these facilities for training, classes, or office spaces. Additionally, these large areas may be used for mock-up demonstrations for future development testing and typically include a variety of support areas (such as dressing rooms, production offices, and kitchens) to accommodate the variety of programmatic uses.

Business as Usual

8.7 As the ERC evolves over time, development will take place to support growth and maintain and increase visitor numbers. One of the ways that UDX ensures that its Theme Parks continue to attract and delight guests is to ensure that they continue to offer the very latest intellectual property brands. To make the best use of its land and to reuse buildings and materials where possible, this is often done through the repurposing of existing rides and attractions, which can be right in the middle of the Theme Park.

8.8 An example of how UDX has practiced this business as usual growth in its resorts was the redevelopment of Amity Island land (JAWS) into Diagon Alley at Universal Studios Florida. The redevelopment transformed the thematic appearance while increasing programmatic offerings (additional attractions, food and beverage locations, retail stores, restrooms, etc.) to increase visitation and resort growth.

8.9 Expansion of the Theme Park may also occur within the ERC, but outside of existing or planned guest areas. These developments may require adjustments to, or reallocation of, existing service areas or operations in order to create an expanded guest experience. An example of UDX expanding a Theme Park in this way was the transformation of surface parking to structured parking at Universal Studios Japan to enhance the park with the addition of two new lands.

8.10 As the design is still evolving for several components of the Proposed Development, and the ERC will continue to evolve over a 20–30-year period, the precise amount of development will not be fixed at the outset. However, the amount will be controlled by the Design Standards which will shape and restrict the way in which the detailed design comes forward and the amount of development that can be built, within the approved parameters. The open-sky concept will control the amount of development that can be built to the maximum permissible heights relevant to each area across the whole Site.

8.11 The intention of UDX's business as usual practices is to strengthen visitation to the resort through incremental growth of newly expanded content and programmatic offerings.

Alternative Development Scenario - Manor Road properties

8.12 UDX has acquired several residential properties in the vicinity of the ERC. UDX's central position and the basis on which the ES is carried out is that the residential properties within the Site boundary remain in residential use. However, an alternative scenario has also been considered which is presented in Appendix 3.3 of the ES whereby the 17 residential properties (along Manor Road and one property on Broadmead Road) in the Site are repurposed for non-residential use. Appendix 3.3 considers the change to the ES if these were used for ERC uses, which generally results in a lessening of significant adverse effects for these properties and no change for the effects reported on other receptors. These areas are shown as the ERC Expansion Areas on the Parameter Plan – Entertainment Resort Complex Land Use **(Document Reference 1.10.0).**

Amount

8.13 As the ES has assessed the maximum parameters, it is not proposed to limit the overall floorspace that can be provided in any zone, although this will be limited by what can be physically accommodated on the Site, and achieve the concepts set out in relation to maximum heights and the open sky concept and articulated skyline principles, in accordance with the Design Standards.

8.14 However, it is proposed that there would be limits on development of certain uses in the Lake Zone and West Gateway Zone, and the overall amount of retail, as this is not UDX's operating concept for the ERC, and venues for conference and/or convention spaces. These maximum amounts limits are provided in Table 5.

8.15 It is also proposed that there would be a maximum individual retail unit size (proposed to be 1,100sqm GEA) in the Lake Zone and West Gateway Zone to ensure that the Proposed Development could not be occupied by large format retail stores, which is not UDX's operating concept.

8.16 In addition to the ERC, the Proposed Development includes:

- An expanded railway station on the Thameslink/Midland Main Railway Line at Wixams.
- A new A421 junction.
- Realignment of Manor Road.
- Certain other local road improvements.
- It also safeguards land for a potential new railway station on the proposed EWR Bletchley to Bedford line, should this come forward in the future.

Layout

Site-wide

8.17 The layout of the Site has been principally led by the location of the Theme Park itself, ensuring appropriate access by road and rail, and was then informed by the approach to a sustainable drainage strategy and ecological mitigation plan, to provide relocated and enhanced habitat and appropriate drainage for the Site. This was developed following

Table 5: Maximum Amounts

Zone	Use	Maximum Amount
Lake	Retail within Class E(a) of the Town and Country Planning (Use Classes) Order 1987 (as amended) (excluding concessions in visitor accommodation, indoor and outdoor entertainment venues, indoor and outdoor sport and recreation, leisure and spa facilities, venues with conference and/or convention spaces and indoor and outdoor cultural facilities)	11,000 sqm (GEA)
	Venues with conference and/or convention spaces (not located in any visitor accommodation)	55,000 sqm (GEA)
	Individual retail unit size within Class E(a) of the Town and Country Planning (Use Classes) Order 1987 (as amended) to be no more than:	1,100 sqm (GEA)
West Gateway	Retail within Class E(a) of the Town and Country Planning (Use Classes) Order 1987 (as amended) (excluding concessions in visitor accommodation, indoor and outdoor entertainment venues, indoor and outdoor sport and recreation, leisure and spa facilities, venues with conference and/or convention spaces and indoor and outdoor cultural facilities, and highway service area)	7,700 sqm (GEA)
	Highway Service Area	16 petrol and/or diesel pumps with associated retail Hydrogen refuelling: below 2 tonnes LPG storage: below 25 tonnes Trips associated with any EV charging stations to be controlled through the Monitor and Manage Plan.
	Individual retail unit Size within Class E(a) of the Town and Country Planning (Use Classes) Order 1987 (as amended) to be no more than:	1,100 sqm (GEA)

engagement with the IDB.

8.18 It is proposed that the areas within which certain uses would be allowed is controlled by land use limitations as set out in Land Use Limitations Table **(Document Reference 1.17.0)** which describes in words where certain components of development can be located, with reference to plans, as necessary. For example, Theme Park(s), amusement(s) and water park(s) can only be located in the Core Zone and rail-related development can only be located in the East Gateway Zone. Further, Parameter Plans have been prepared for the location of the ERC Core Zone Transport Hub and Utility Compound, and rail-related development can only be located in the East Gateway Zone and the Core Zone Transport Hub.

Wixams Rail Station

8.19 Wixams Rail Station benefits from existing planning permissions for a station building, forecourt and parking on the east side of the tracks and amendments to the existing railway line (planning permission references 23/02629/MDC3 (the S73 full permission) and 23/02136/M73 (the S73 Outline Permission). Further details are provided in the Planning Statement **(Document Reference 6.1.0)**. The transport vision for the Proposed Development envisages a four-platform, four-track station at Wixams, to provide appropriate comfort and journey times to the local community, including the Proposed Development. Accordingly, the Proposed Development includes a new station building, four platforms and track modifications. It is intended that the permission authorising the Proposed Development will replace in its entirety the S73 Full Permission. No works are proposed to the land bound by the S73 Outline Permission and the related reserved matters, meaning those existing consents for the station building and eastern plaza element remain unaffected. Should planning permission be granted for the Proposed Development, it is intended that Network Rail will construct the new Wixams Rail Station pursuant to that new permission, together with the S73 Outline Permission and the related reserved matters. For full details of matters relating to Wixams planning permissions refer to the Planning Statement.

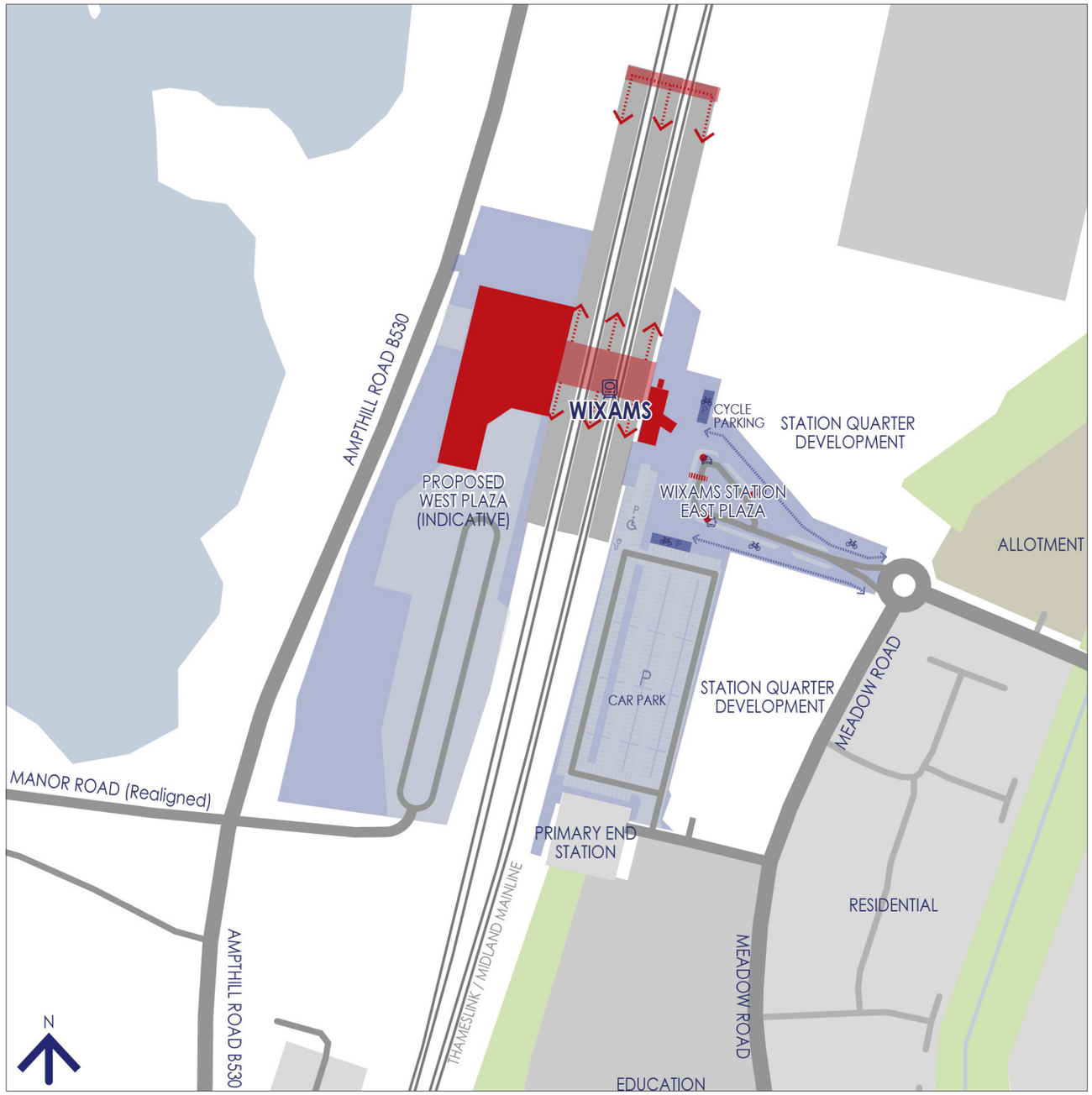


Figure 11: Wixams Rail Station indicative layout (not to scale)

8.20 Beyond the station the fast lines would follow a right hand curve before reversing and passing through the western redundant span of overbridge SPC1/178 (Hardwick) and rejoining the existing fast lines to the north of the overbridge. The slow lines follow flatter reversing geometry, passing through the main span of overbridge SPC1/178 and rejoining the existing alignment.

8.21 The layout is dictated by the following key site constraints:

- Existing railway line
- Proposed station buildings, forecourt, and car parking to the east of the railway line, which will remain as previously approved.

8.22 The layout of the platforms, footbridge, and ramps will be designed in response to and dictated by the railway engineering and operating requirements as well as the integration of multi-modal connectivity.

8.23 An indicative layout for the Full Wixams Rail Station (including those elements being consented outside of the Proposed Development) is provided in Figure 11 above, although the layout and design are still being developed by Network Rail.

EWR Station

8.24 The planning proposal safeguards land for a potential new EWR station should this proceed, however, planning permission is not sought for it at this stage. If the EWR station does not proceed, the Proposed Development includes the fall back of certain other uses in the West Gateway which would be subject to the relevant controls and parameters set out in the planning proposal.

A421 and other local roadway works

8.25 The Promoter has engaged with DfT, National Highways and Bedford BC regarding the design for a new A421 junction. The highway works are proposed to be controlled through the

Table 6: Maximum Height Parameters for Buildings and Structures

Masterplan Component	Maximum Height AGL (m)	Location	Maximum Height AOD (m)
ERC (unless otherwise defined below)	75	Core Zone	117
		Lake Zone	110.5
		West Gateway Zone	111
Associated services and uses for any operational or administrative functions (Entertainment Resort Complex support)	25	Core Zone	67
		Lake Zone	60.5
		West Gateway Zone	61
Utility Compound	20	Lake Zone	55.5
Rail- related development (other than Transport Hubs)	22	East Gateway Zone	59.5
Transport Hubs	30	Core Zone	66.3
		East Gateway Zone	67.5
Carpark (surface)	10	Core Zone	46.3
		Lake Zone	45.5
		West Gateway Zone	47.5
		East Gateway Zone	47.5
Carpark (multi-storey)	30	Core Zone	66.3
		Lake Zone	65.5
		West Gateway Zone	67.5
		East Gateway Zone	67.5
Roadways (other than Eastbound off-slip of A421 junction)	15	Core Zone	59.6
		Lake Zone	54
		West Gateway Zone	59.4
		East Gateway Zone	50.3
Ecological Enhancement Area	10	Core Zone	45.7
		Lake Zone	39.5
		West Gateway Zone	43.7
Eastbound off-slip of the A421 junction	25	West Gateway Zone	68
Fences and any integral gates	5.4	Core Zone	59.5
		Lake Zone	54
		West Gateway Zone	59.4
		East Gateway Zone	50.3

Maximum Height: The height of any building or structure shall be the vertical distance, in metres, measured from the finished grade to the highest point of the building or structure or roof structure or parapet wall, whichever is highest. For the purposes of measuring height, roof structures shall include rooftop equipment, architectural elements and thematic elements, but not communications equipment.

Table 7: Maximum Height by Land Area

Rule No.	Zone or 'Rule'	Location	Maximum Height AGL (m)	Maximum Height AOD (m)
1	ERC Expansion Areas	Core Zone	10	45.7
		Lake Zone	10	39.5
2	EEA	Core Zone	10	45.7
		Lake Zone	10	39.5
		West Gateway Zone	10	43.7
3	Within 20m of the boundary of the EEA except for where adjacent to Roadways where this rule shall apply within 7m of the EEA. This rule does not apply for grade separated crossings (see defined terms) or where adjacent to watercourses (although other limitations may apply).	Lake Zone	10	44
4	Within 20m of both sides of the proposed adopted boundary of all Roadways (including the northern edge of the proposed adopted boundary of Manor Road) except where adjacent to the EEA where this rule will apply within 7m of a Roadway. This rule does not apply to grade separated crossings (see defined terms) and along Broadmead Road.	Lake Zone	10	39.5
		West Gateway Zone	10	43.7
		East Gateway Zone	10	47.5
5	Within 20m of both sides of the proposed adopted boundary of Roadways in the Core Zone, except along Railway undertakers' operational land and grade separated crossings (see defined terms) where MH01 only applies, and the southern edge of the proposed adopted boundary of Manor Road where rule 6 applies.	Core Zone	10	45.7
6	Within 30m of the southern edge of the proposed adopted boundary of Manor Road along the northern edge of the Core Zone, unless the residential properties within the Site on Manor Road are no longer occupied for residential use and have either been demolished or planning permission has been granted and implemented for a change to a non-residential use.	Core Zone	10	45.7
7	Within 20m of all edges of the ERC, excluding Roadways and Railway undertaker's operational land	Core Zone	10	45.7
		Lake Zone	10	39.5
		West Gateway Zone	10	43.7
		East Gateway Zone	10	47.5
8	Within 100m from the southernmost edge of the ERC	Core Zone	10	45.7
9	Development land area located south of the EEA and east of Roadway at the southern part of the Lake Zone	Lake Zone	20m	55.3
10	Within 45m of the height zones established by rules 4, 5 and 6	Core Zone	30m	66.3
		Lake Zone	30m	65.5
		West Gateway Zone	30m	67.5
11	East West Rail Safeguarded Land	West Gateway Zone	30m	67.5
12	Attraction Overlay Zone - +40m in height in areas subject to a 75m height limit in the Core Zone pursuant to Table MH01	Core Zone	115	157
13	Attraction Overlay Zone Limit of Deviation Manor Road – +40m in height in the area 45m north of the area subject to a 75m height limit in the Core Zone pursuant to Table MH01, unless the residential properties in ERC expansion areas A-C are no longer occupied for residential use and have either been demolished or planning permission has been granted and implemented for a change to a non-residential use. The area 45m north to which this rule applies is within the area covered by the 30m height limit in the Core Zone pursuant to rule 10 in this Table MH02.	Core Zone	70	106.3
14	Attraction Overlay Zone Limit of Deviation Broadmead Road – +40m in height in areas 45m south of those areas subject to a 75m height limit in the Core Zone pursuant to Table MH01, unless the residential property in ERC expansion area D is no longer occupied for residential use and has been demolished, or planning permission has been granted and implemented for a change to a non-residential use. The area 45m south to which this rule applies is within the area covered by the 30m height limit in the Core Zone pursuant to rule 10 in this Table MH02.	Core Zone	70	106.3

Attraction Overlay Zone – In the Attraction Overlay Zone, the overall height of a structure may exceed the base height by up to 40m for any non-occupiable or non-habitable features where the destination is difficult to access or inaccessible, such as architectural features of buildings (i.e. cornices, eaves, gutters, towers, spires, monuments, skylights, flagpoles, domes and cupolas), cranes temporarily mounted on buildings during construction, fire or parapet walls, roof structures for housing elevators, stairways, tanks, ventilating fans, solar energy collectors or similar equipment to operate and maintain the building, or in the case of an amusement ride, tracks or other structural components.

Access and Roadways Parameter Plan **(Document Reference 1.11.0).** The preliminary roadway designs discussed with the statutory consultees fit within these parameters, however the limits of deviation allow scope for change, if necessary, during detailed design, and also fix the parameters for other roadways within the Site.

8.26 As explained in the Transport Assessment (Appendix 5.1 of the ES **(Document Reference 4.5.1.0)**), it is not yet definite that the grade separated crossing at Manor Road (i.e. a road bridge over the railway) authorised under the TWAO will be delivered and therefore the Proposed Development includes three options to retain flexibility to adapt to Network Rail's proposals:

- Option A includes elevated highways east of the Marston Vale Railway Line to tie into the new grade separated crossing to be delivered by Network Rail;
- Option B recognises that Network Rail may close the level crossing and Manor Road, and instead provide a pedestrian and cycle bridge to connect the platforms at Kempston Hardwick Station. The Proposed Development would therefore provide active travel connections to the new pedestrian and cycle bridge, while the highways to east of the Marston Vale Railway Line would be delivered at grade; and;
- Option C recognises that the level crossing may be retained. This option therefore retains the at grade highway connection to the level crossing and provides a new pedestrian/cyclist bridge over the Marston Vale Railway Line.

Scale

8.27 The scale of the development will vary across the Site, depending on the proposed use. Design Standards (Standards MH01, MH02 and OSC01) have been developed to reflect the maximum permissible heights as shown in Tables 6 and 7 (Note that these tables are replicated here for information only – the control is provided within the Design Standards). The approach sets a maximum permissible base height for buildings and structures, with an 'attraction overlay zone' which allows the overall height of a structure to exceed the base height by up to 40m for any non-occupiable or non-habitable features where the destination is difficult to access or inaccessible, such as architectural features of buildings (i.e. cornices, eaves, gutters, towers, spires, monuments, skylights, flagpoles, domes and cupolas), cranes temporarily mounted on buildings during construction, fire or parapet walls, roof structures for housing elevators, stairways, tanks, ventilating fans, solar energy collectors or similar equipment to operate and maintain the building, or in the case of an amusement ride, tracks or other structural components. This is to allow for the signature and feature elements of the Theme Park, as well as infrastructure such as communications equipment.

8.28 Within the Theme Park, the maximum height of any component will be 115m, whilst the maximum height of an occupiable floor (i.e. flat surface that a person can occupy, including a roof top) would be 75m. The reason for proposing structures up to this maximum height is to allow the proposed Theme Park to compete with other attractions in Europe. Although the Universal Orlando Resort does not currently have attractions up to this height, taller attractions are more common in Europe, where rides need to be taller to create the experience, as space is more constrained (See Figure 14 on page 39). Building attractions that are higher rather than over greater areas also makes the best use of land which is in line with planning policy.

8.29 The approach to the maximum height strategy is shown within Figures 12 and 13 for indicative purposes to show two ways in which the height limits could apply. The maximum allowable height by Land Area is however controlled by table MH02 in the Design Standards **(Document Reference 6.3.0)**.

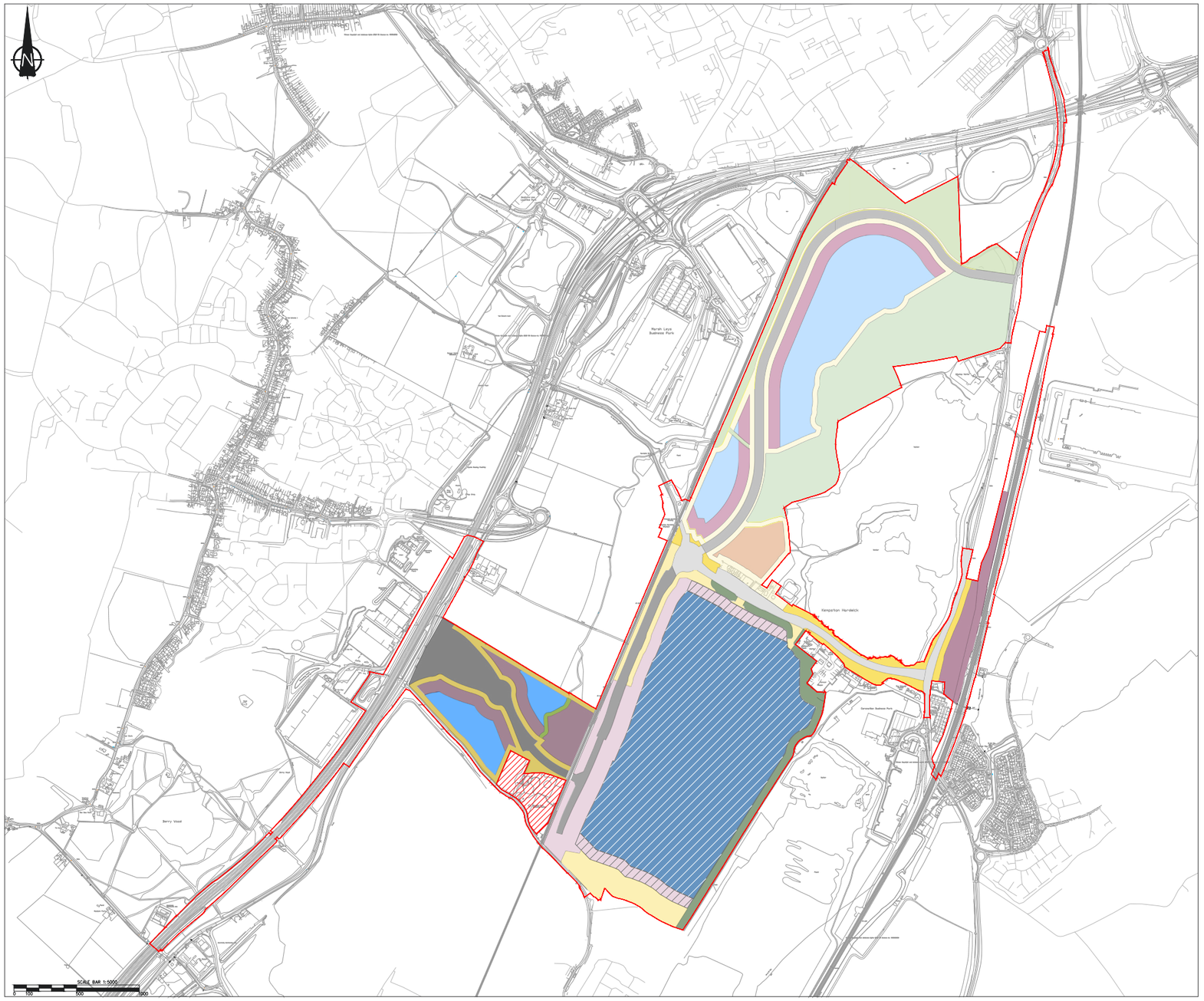
8.30 The maximum height parameters are proposed in combination with the "Open Sky Concept Articulated Skyline" Design Standard (Standard OSC01) which requires the Proposed Development to incorporate variegated skylines with extensive open sky views, to add visual interest and to help reduce landscape and visual impact. Further detail is provided in the Design Standards **(Document Reference 6.3.0)** and summarised below.

8.31 An ariculated skyline is achieved by incorporating components of varying heights. Most buildings of the Proposed Development will not reach the maximum height limits and will typically range in height from 20m to 30m, while a few may rise to a higher level to create visual interest and orientation within the theme park, located in the Core Zone, and development in neighbouring Zones.

8.32 An articulated skyline will be achieved by implementing the key design principles set out in OSC01 in the Design Standards. The land areas in Table OSC02 of the Design Standards will be used for the purposes of calculating the percentages in OSC01 and implementing the Open Sky Concept although the final applicable land areas will be approved at the time of approval of the applicable Zonal Masterplan or Core Zone Perimeter Masterplan..

8.33 An example of how the height and articulated skyline controls in the Design Standards would work in practice is set out below.

8.34 A hotel located in the Lake Zone would have a maximum height of 75m (110.5m AOD) pursuant to MH01. However, if that hotel is located outside, but within 20m of the EEA, that portion of the hotel would have a maximum height of 10m pursuant to rule 3 in MH02, unless it is also adjacent to a Roadway, in which case that portion would only be subject to the maximum height of 10m if it was within 7m of the EEA. Furthermore, it would be subject to a 30m height limit pursuant to rule 10 for the portion that was within 45m of the Roadway. This approach is intended to create a tiered wedding cake style approach to height moving away from the EEA and Roadways, to create an attractive streetscape. Once this is established, the "Open Sky Concept Articulated Skyline" standard in OSC01 would be applied in the context of the total development then existing



Key

Site Boundary

Excluded from Site Boundary

AOD = Above Ordnance Datum

AGL = Above Ground Level

Core Zone

Road Right-of-Way
+15m Maximum Height AGL
Highest Level 59.6mAOD

Ecological Enhancement Area
+10m Maximum Height AGL
Highest Level 45.7mAOD

+10m Maximum Height AGL
Highest Level 44mAOD

+30m Maximum Height AGL
Highest Level 66.3mAOD

Attraction Overlay Limit of Deviation
+40m Maximum Height AGL
Highest Level 106.3mAOD

+75m Maximum Height AGL
Highest Level 117mAOD

Attraction Overlay Area
+40m Maximum Height AGL
Highest Level 157mAOD

Lake Zone

Road Right-of-Way
+15m Maximum Height AGL
Highest Level 59.6mAOD

Ecological Enhancement Area
+10m Maximum Height AGL
Highest Level 39.5mAOD

+10m Maximum Height AGL
Highest Level 44mAOD

+20m Maximum Height AGL
Highest Level 55.5mAOD

+30m Maximum Height AGL
Highest Level 65.5mAOD

+75m Maximum Height AGL
Highest Level 110.5mAOD

East Gateway Zone

Road Right-of-Way
+15m Maximum Height AGL
Highest Level 50.3mAOD

+10m Maximum Height AGL
Highest Level 47.5mAOD

+30m Maximum Height AGL
Highest Level 67.5mAOD

West Gateway Zone

Road Right-of-Way
+25m Maximum Height AGL
(A421 Junction)
Highest Level 59.4mAOD

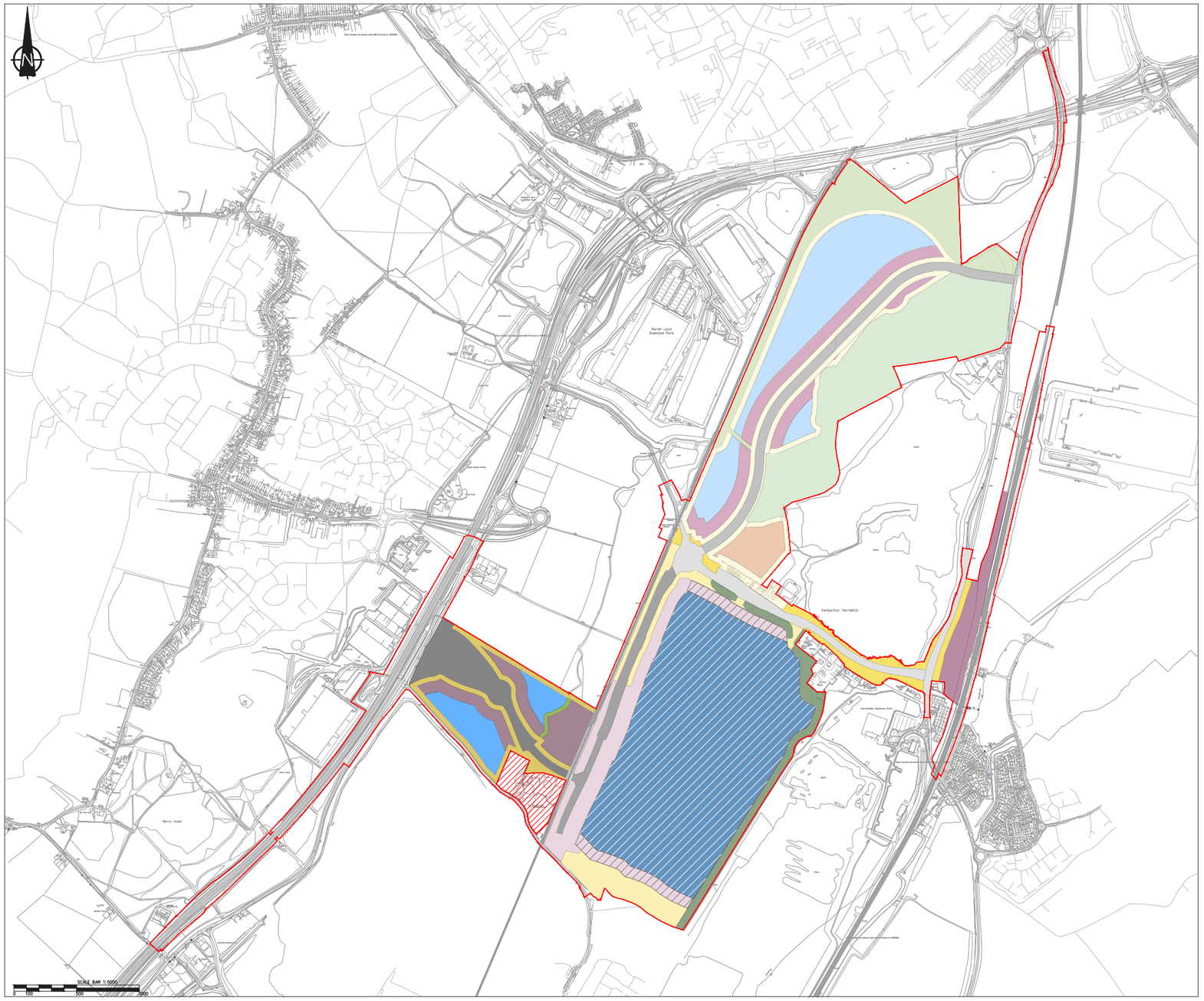
Ecological Enhancement Area
+10m Maximum Height AGL
Highest Level 43.7mAOD

+10m Maximum Height AGL
Highest Level 47.5mAOD

+30m Maximum Height AGL
Highest Level 67.5mAOD

+75m Maximum Height AGL
Highest Level 111mAOD

Figure 12: Indicative maximum height strategy primary scenario (not to scale; shown for illustrative purposes only)



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+30m Maximum Height AGL
Highest Level 66.3mAOD

Attraction Overlay Limit of Deviation
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Highest Level 117mAOD

Attraction Overlay Zone
+40m Maximum Height AGL
Highest Level 157mAOD

Lake Zone

Road Right-of-Way
+15m Maximum Height AGL
Highest Level 59.6mAOD

Ecological Enhancement Area
+10m Maximum Height AGL
Highest Level 39.5mAOD

+10m Maximum Height AGL
Highest Level 44mAOD

+20m Maximum Height AGL
Highest Level 55.5mAOD

+30m Maximum Height AGL
Highest Level 65.5mAOD

+75m Maximum Height AGL
Highest Level 110.5mAOD

East Gateway Zone

Road Right-of-Way
+15m Maximum Height AGL
Highest Level 50.3mAOD

+10m Maximum Height AGL
Highest Level 47.5mAOD

+30m Maximum Height AGL
Highest Level 67.5mAOD

West Gateway Zone

Road Right-of-Way
+25m Maximum Height AGL
(A421 Junction)
Highest Level 59.4mAOD

Ecological Enhancement Area
+10m Maximum Height AGL
Highest Level 43.7mAOD

+10m Maximum Height AGL
Highest Level 47.5mAOD

+30m Maximum Height AGL
Highest Level 67.5mAOD

+75m Maximum Height AGL
Highest Level 111mAOD

Figure 13: Indicative maximum height strategy alternative scenario (not to scale; shown for illustrative purposes only)

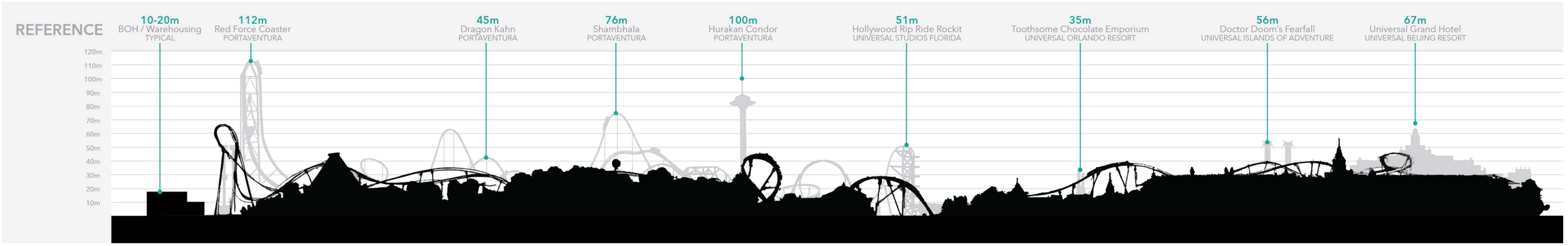


Figure 14: Articulated skyline concept and comparative heights

in the Lake Zone to determine what percentage would be allowed to be Medium or Tall Components.

Landscaping

8.35 Boundary landscape and greenery are key to mitigating and softening articulated skyline impacts by providing a degree of masking of the development. The site will make use of this approach and will include a combination of landscape, bunding and planting as part of the boundary edge treatment.

8.36 An example of how the Articulated Skyline standard may work is illustrated in Figure 14. Other existing worldwide attractions are included for context.

Appearance

8.37 The appearance of the Proposed Development is not yet defined. For the Inner Core Zone, the detailed design will be in accordance with the Design Standards relating to height and Articulated Skyline, but otherwise UDX needs the flexibility to deliver the high quality, themed, immersive environment that they specialise in. It is envisaged that a Zonal Masterplan and Zonal Design Standards will be approved for the Core Zone Perimeter (defined as a 10m strip around the edge of the Core Zone) and all other Zones. The proposed post-decision approval process is set out in section 10.0. The final appearance of buildings and structures will be determined in accordance with this process and UDX is considering opportunities for the re-use of remaining bricks from the former brickworks as part of this detailed design.

Theme Park

8.38 The appearance of the Theme Park itself will be generally consistent with UDX's other destinations, which are based around a series of immersive worlds. The theme of each immersive world will be the primary determinant of the physical appearance.

8.39 For other uses in the ERC, including retail, dining and entertainment uses, the post-decision approval process will ensure that the development achieves a design which is appropriate for its use and context.

Wixams Rail Station

8.40 The Transport Vision for the Proposed Development includes a four-platform station at Wixams, to provide appropriate comfort and journey times to the local community, as well as serving the proposed ERC.

8.41 The external appearance of the station buildings and western plaza will be subject to the post-decision approval process and will be informed by functional requirements as well as ensuring development that is appropriate to its context.

EWR Railway Station

8.42 The Proposed Development safeguards the land for a new station on the proposed EWR service, directly serving the Proposed Development, should EWR decide to deliver this

Figure 15: Reference imagery Universal Studios Hollywood Arch

Figure 16: Reference imagery Universal Studios Legacy Store

in the future. However, the planning proposal also includes an alternative scenario if the EWR Railway Station is not developed. This station, if delivered, would open up to both the east and west side of the railway line. The east side of the railway line will be 'Resort' facing and deliver visitors to the location of the local transport hub for the Theme Park.

8.43 In the event that the EWR Railway Station does not proceed, this area will be developed for certain mixed uses, specified in the Description of Development **(Document Reference 1.9.0)**.

A421 works

8.44 As noted above, the design of the A421 works is being developed in accordance with the Design Manual for Roads and Bridges, in collaboration with National Highways. This design can be accommodated within the parameters set out in the Access and Roadways Parameter Plan, including the limits of deviation, and would be subject to detailed design approval, in accordance with the post-decision approval process. The appearance will be primarily dictated by safety and engineering requirements.

Landscape and Biodiversity

8.45 The detailed location and design of landscaping is not yet established; however, it will be in accordance with the Design Standards **(Document Reference 6.3.0)** and Environmental Controls Document **(Document Reference 6.16.0)**. Landscaping and greening play an important part in how UDX designs and creates its theme parks. UDX plants thousands of trees and creates green, natural areas around its sites to both enhance biodiversity and provide perimeter screening.

8.46 The creation of a new Ecological Enhancement Area will be a core component of UDX's proposals for the Lake Zone. A large area of new habitat will be created, both to provide replacement habitat and to enable existing protected species on the Site to be relocated. It will also provide an essential role in greening the Site and providing a home for nature in an area that was primarily the clay pits associated with the brick works.

8.47 The Outline Landscape and Ecology Management Plan **(OLEMP, document 4.6.5.0)** and the Outline Habitat Creation and Enhancement Plan (OHCEP) within the Environmental Controls Document **(Document Reference 6.16.0)** controls the overall landscape strategy for the Site. The landscaping scheme for the Site (other than the Inner Core Zone) would be controlled through the approval of Zonal Design Standards relating to landscaping and submission of Compliance Plans which will include landscaping details.

Outline Habitat Creation and Enhancement Plan

8.48 The Outline Landscape and Ecology Management Plan **(OLEMP, Document Reference 4.6.5.0)** and the Outline Habitat Creation and Enhancement Plan **(OHCEP, Document Reference 4.6.4.0)** set out the details for habitat creation and management within the Site and these measures are controlled via the Environmental Controls Document **(Document Reference 6.16.0)**. The landscaping scheme for the Site (other than the Inner Core Zone) would be controlled through the approval of Zonal Design Standards relating to landscaping and submission of Compliance Plans which will include landscaping details.

8.49 The newly created habitat areas will also act as receptor sites for species translocation. The following major habitat areas which will be created in several EEAs distributed across the Site.

- A new lake will be created in the Lake Zone where presently there are currently three partially disconnected former quarry/brick pit lakes. Water levels in the new combined lake will be deeper and more permanent than the current shallow and part ephemeral waterbodies. Water supply for these lakes will be attenuated via a new watercourse connection from the Core Zone during rainfall and storm events. The new lakes will partly act as a reservoir, providing treated water to the operational Core Zone, as required. However, they will be also designed as varied wildlife habitat and will serve a dual function.
- The new lake will support shallow, littoral banks with aquatic vegetation;
- Fringing marginal reedbeds and swamp habitat around approximately 60% of the new lake;
- Shallow areas with small islands which may support nesting/roosting wetland birds;
- Steep bank/cliff habitat which could support sand martin or kingfisher; and
- On the new lake southern shore, and open mosaic of grassland, scrub and ruderal vegetation will be created.

Green Infrastructure Statement

8.50 UDX has engaged with the IDB and Natural England to draw together an approach to Green infrastructure which is consistent with Natural England's GI Framework. It pulls together the information on delivery of blue and green infrastructure from various places in the planning proposal in one place to demonstrate a cohesive approach. The measures within it are not for approval and are secured by controlling documents as relevant. The GI Statement is appended to this DAS at Appendix 1.

Terms used in this section 8.51 but not defined herein, are as defined in the GI Statement.

Landscape cross-sections

8.51 Typical cross sections have been prepared which illustrate a few examples of ways in which the Design Standards and Environmental Controls can be applied to create an appropriate relationship between the ERC and its wider environment. See Figures 18 to 21 (overleaf).

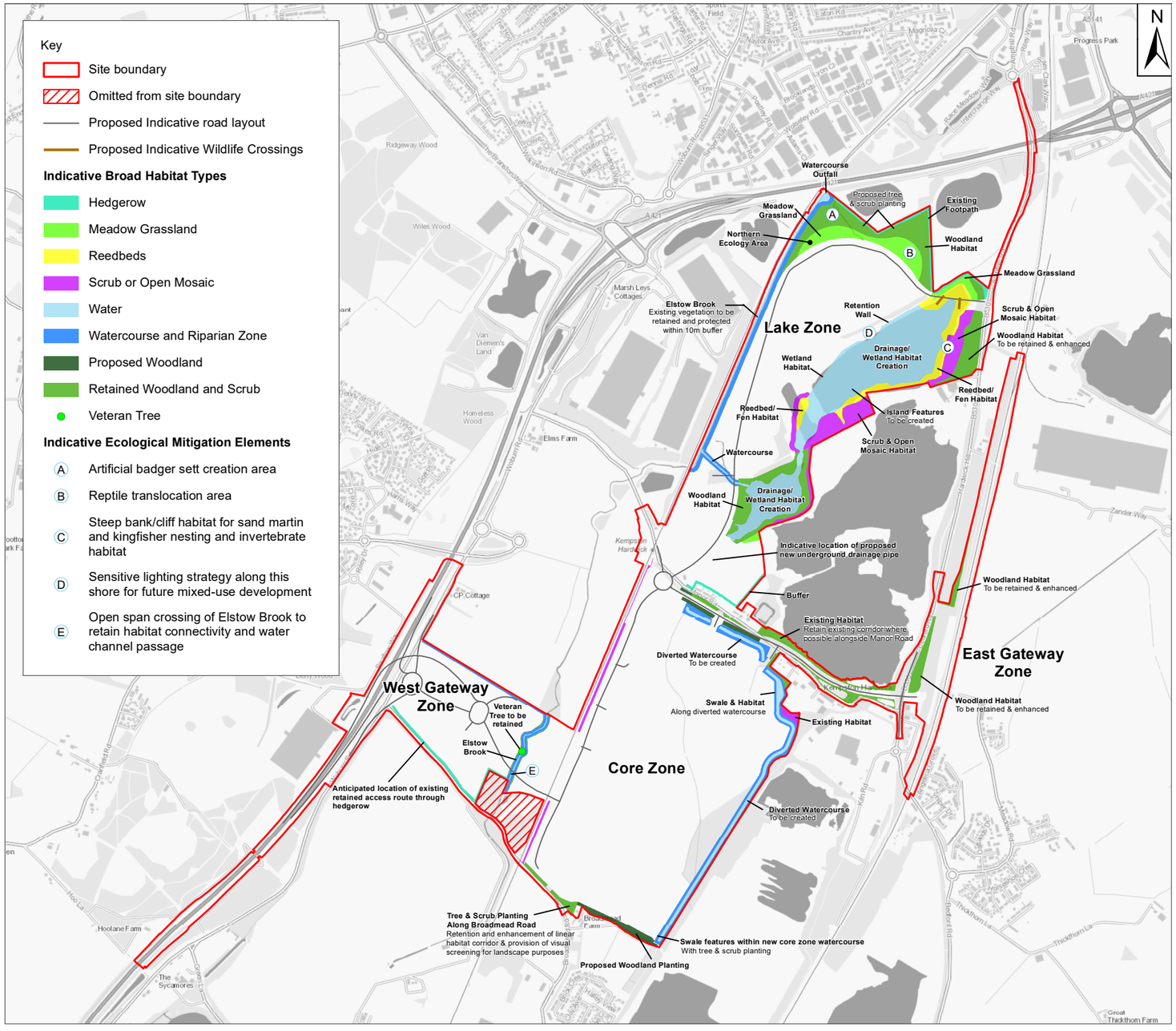
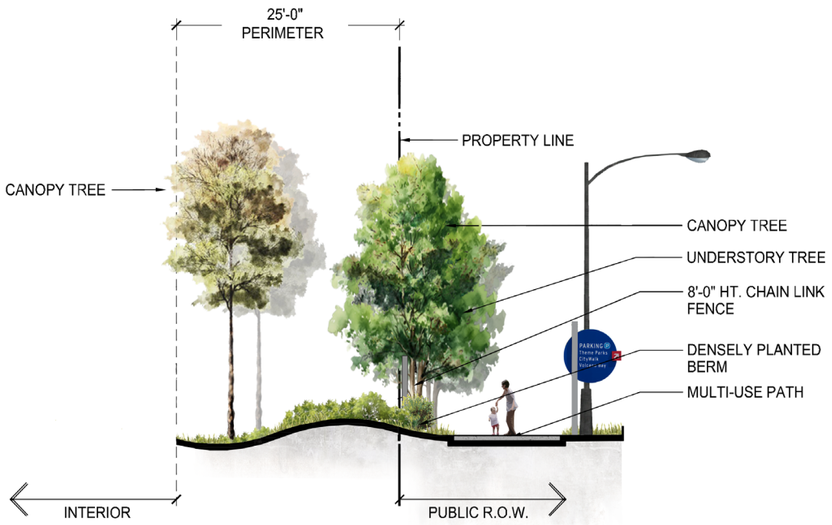
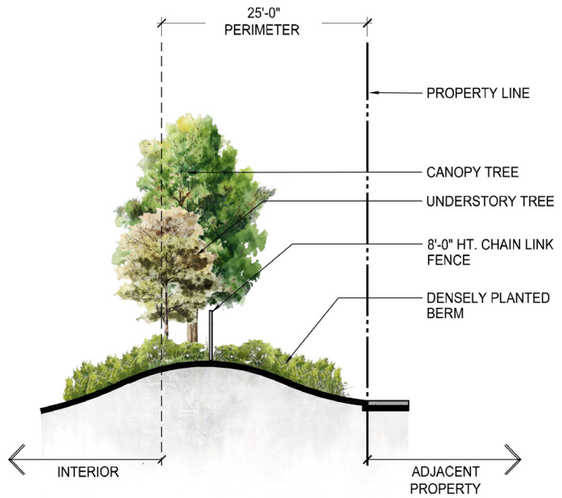


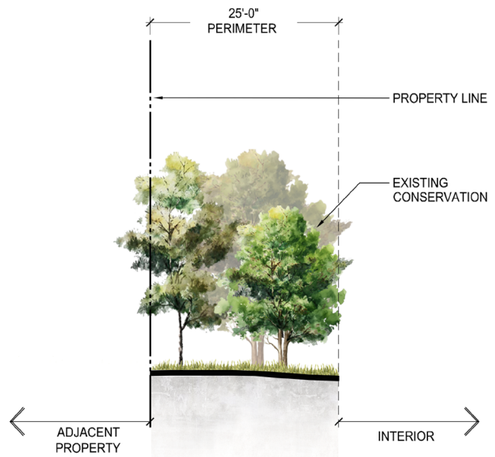
Figure 17: Outline Habitat Creation and Enhancement Plan (not to scale)



SECTION AT PUBLIC RIGHT-OF-WAY
N.T.S.



SECTION AT ADJACENT PROPERTY
N.T.S.



SECTION AT CONSERVATION
N.T.S.

Figure 18: Indicative cross sections (not to scale)

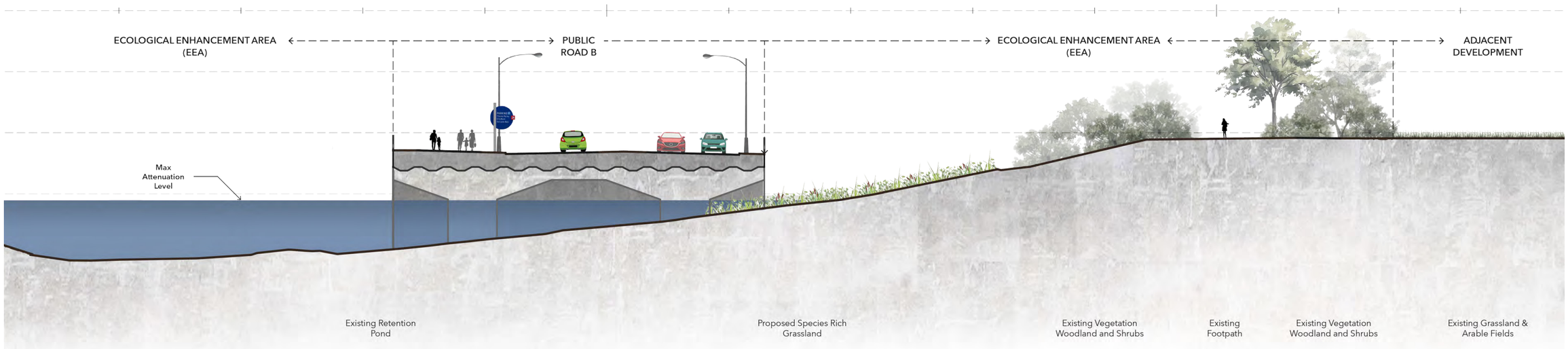


Figure 19: Indicative cross section through proposed public road and Ecological Enhancement Area (not to scale)

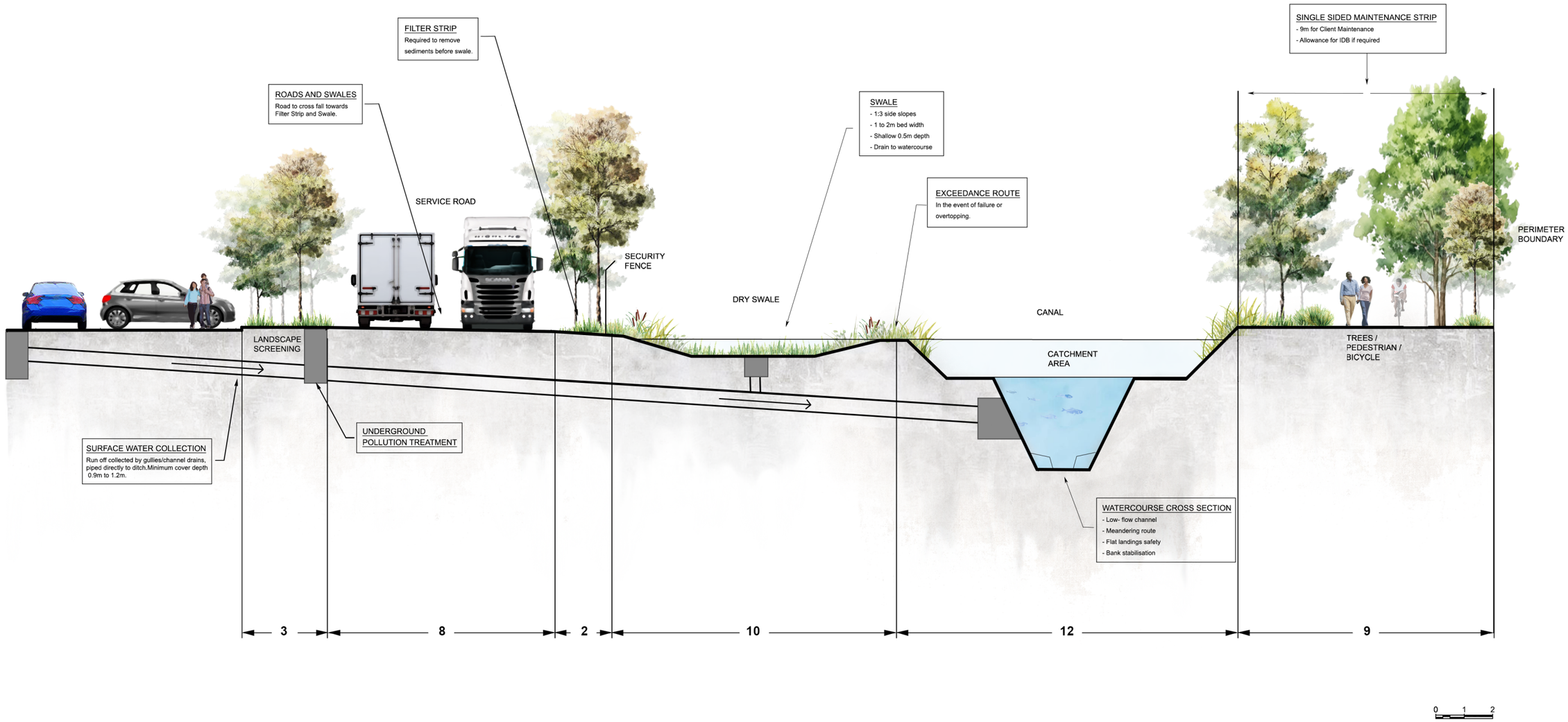


Figure 20: Indicative cross section showing car park screening, internal service road, security fencing, stormwater drainage swale, open watercourse and perimeter landscaping (not to scale)

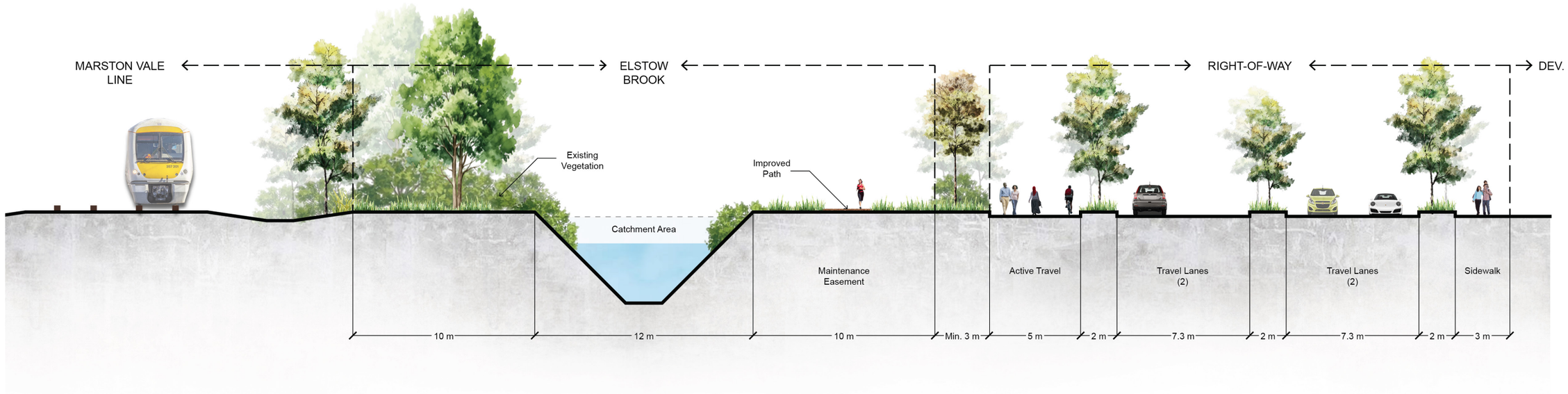


Figure 21: Indicative cross section through Marston Vale Line, Elstow Brook and public right of way (not to scale)

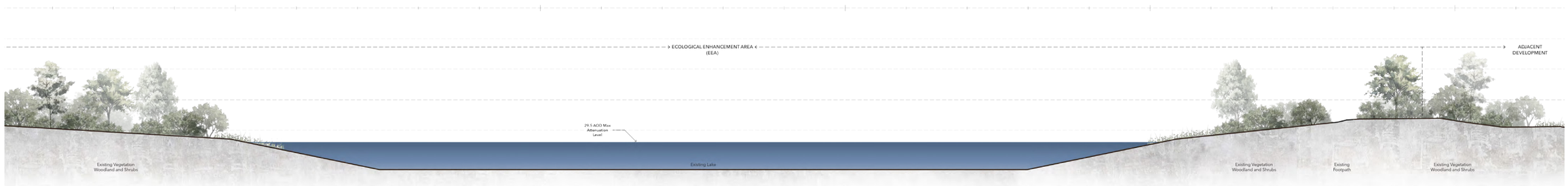


Figure 22: Indicative cross section through Ecological Enhancement Area (not to scale)

Examples of landscaped settings

8.52 Examples of the way in which UDX integrates landscape in its resort designs are provided in the following images. The intention would be to landscape this resort in a similar manner in accordance with the Environmental Controls and Zonal Design Standards (to be approved), taking into account local species, climate and landscaping compliance plans.

Signage

8.53 The Description of Development **(Document Reference 1.9.0)** allows for structural signage which forms a central part of UDX's design of its theme parks, to enable visitors to easily move around the site. This may include the iconic globe or some other similar feature at the entrance(s) to the ERC and/or Theme Park, monument signage and wayfinding signs, examples of which are shown in the images on the following pages.

8.54 Any advertisements which do not benefit from deemed consent will be required to gain express permission as set out in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Figure 23: Reference imagery from Citywalk promenade at Universal Orlando Resort reflecting a mixture of waterside landscaping, lighting and planters

Figure 24: Reference imagery of guest pathway reflecting mixture of landscape types, typically prioritising colourful groundcover closest to pathways

Figure 25: Reference imageryof guest pathway referencing use of shade trees and a variety of groundcover

Figure 26: Reference imagery showcasing landscaping used as transitional / visual buffer to non-guest areas

Figure 28: Reference imagery referencing a blend of mature trees. shrubbery and groundcover along guest pathway

Figure 27: Reference imagery from Universal Orlando Resort depicting pathway lighting, fixtures and a variety of planting along guest pathway

Figure 29: Reference imagery from Universal Orlando Resort along guest pathway from hotel to the Theme Park entrance

Figure 30: Reference imagery from Universal Orlando Resort depicting monumental signage at vehicular resort entrance

Figure 31: Reference imagery from Universal Orlando Resort that depicts native plant species integrated along waterways

Figure 32: Reference imagery depicting vehicular wayfinding signage and typical landscaping along resort roadways

Figure 33: Reference imagery from Universal Orlando Resort Hard Rock Hotel depicting ornamental landscaping within guest facing area

9.0 ACCESS

Construction Access

9.1 In the early stages of construction, the main point of access for HGVs and LGVs would be via Broadmead Road (for the ERC) and from the B530 Ampthill Road (for Wixams Rail Station), following the routes illustrated in the Construction Traffic Management Plan (CTMP) provided in the Outline Construction and Environmental Management Plan (OCEMP) **(Document Reference 4.2.30)**.

9.2 The CTMP proposes the routes shown in Figure 34 for HGVs and Abnormal Indivisible Loads (AILs) accessing the Site during construction.

Proposed Highway Access

9.3 The vehicular access to the ERC would be via a new junction on the A421, including a new eastbound off slip into the Site, a new westbound off slip into the Site and a new westbound on slip away from the Site once these new ramps are completed. Access to the new EWR Railway Station, if brought forward in the future by EWR, would be via this route as well, or alternatively local users could access the station via Manor Road and Public Road A. Private vehicle access to Wixams Rail Station would be via Meadow Road, through the Wixams settlement. It is proposed that there would be a plaza to the west of the station on Ampthill Road (B530) which would be for bus, cycle and pedestrian access.

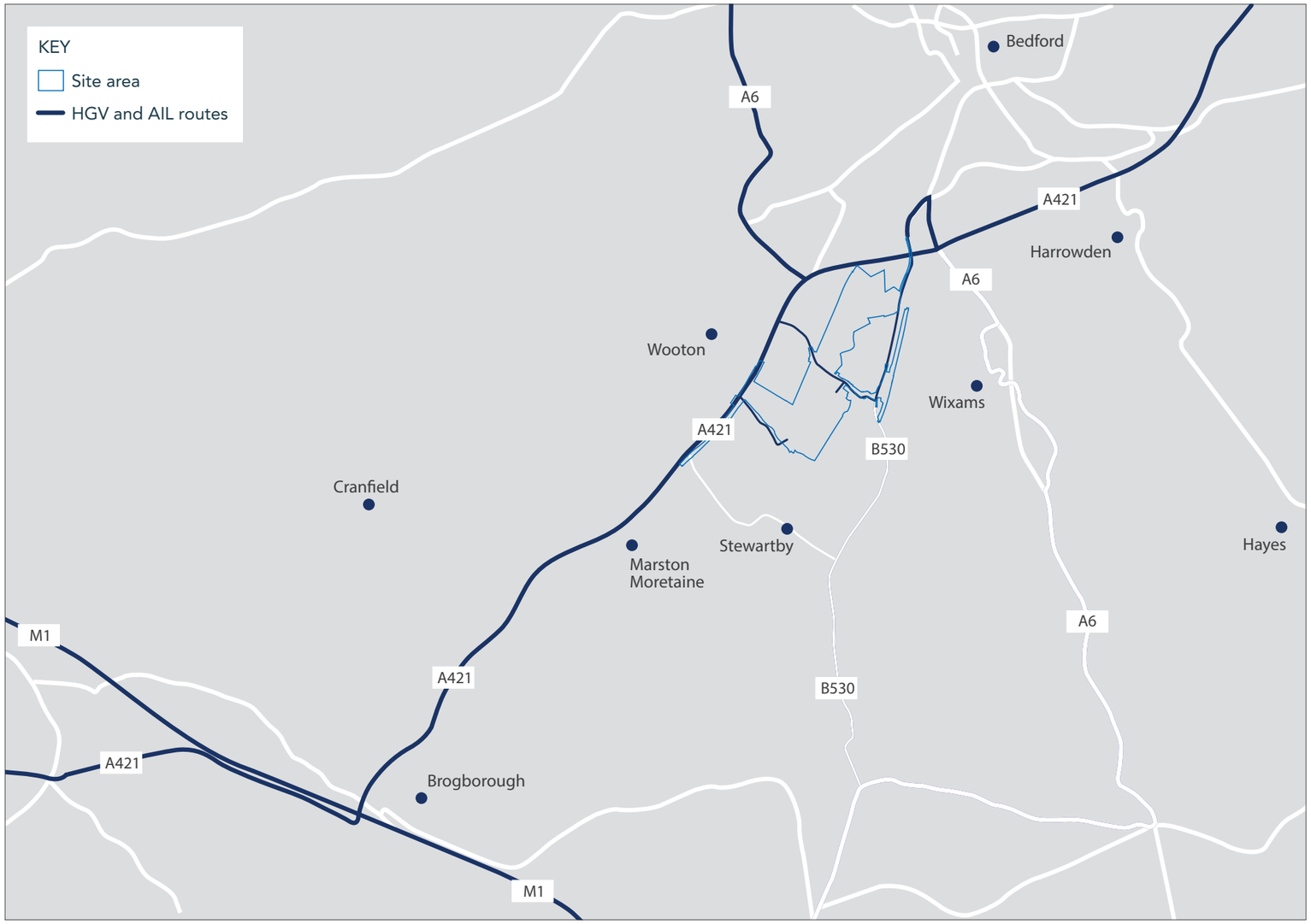


Figure 34: HGV and AIL routes during construction (not to scale; site boundary shown for indicative purposes)

9.4 A plan illustrating the overall access strategy is provided at Figure 35. The Access and Roadways Parameter Plan **(Document Reference 1.11.0)** and Active Travel Parameter Plan **(Document Reference 1.12.0, Figure 36)** set out the existing and proposed vehicular and pedestrian routes respectively, and are for approval pursuant to any planning permission granted.

Inclusive Access

Theme Park

9.5 UDX is committed to creating a theme park experience that's inclusive and accessible to everyone, ensuring that all guests can embark on unforgettable journeys regardless of their abilities. Accessibility is built into many aspects of the design of the Theme Park. Measures include:

- Pathways are wide and smooth, making it easy for guests using wheelchairs or mobility aids to navigate with ease.
- Ramps and elevators are strategically placed, to ensure that each corner of the park is accessible to all.
- Toilet blocks have accessible facilities and are placed in easy to navigate locations.
- UDX offers a variety of accommodations at their hotels and restaurants, to ensure that every guest feels comfortable and supported during their visit.
- Attractions are designed to accommodate a wide range of ages and abilities. Typically, an attraction or roller coaster would have one seat or row that can accommodate guests with walking impairments or wheelchair users.
- UDX provides state-of-the-art assistive technology to enhance the experience for guests with sensory, visual or hearing impairments. This includes captioning, audio description services for shows and attractions, as well as tactile maps and guides. The theme park would have

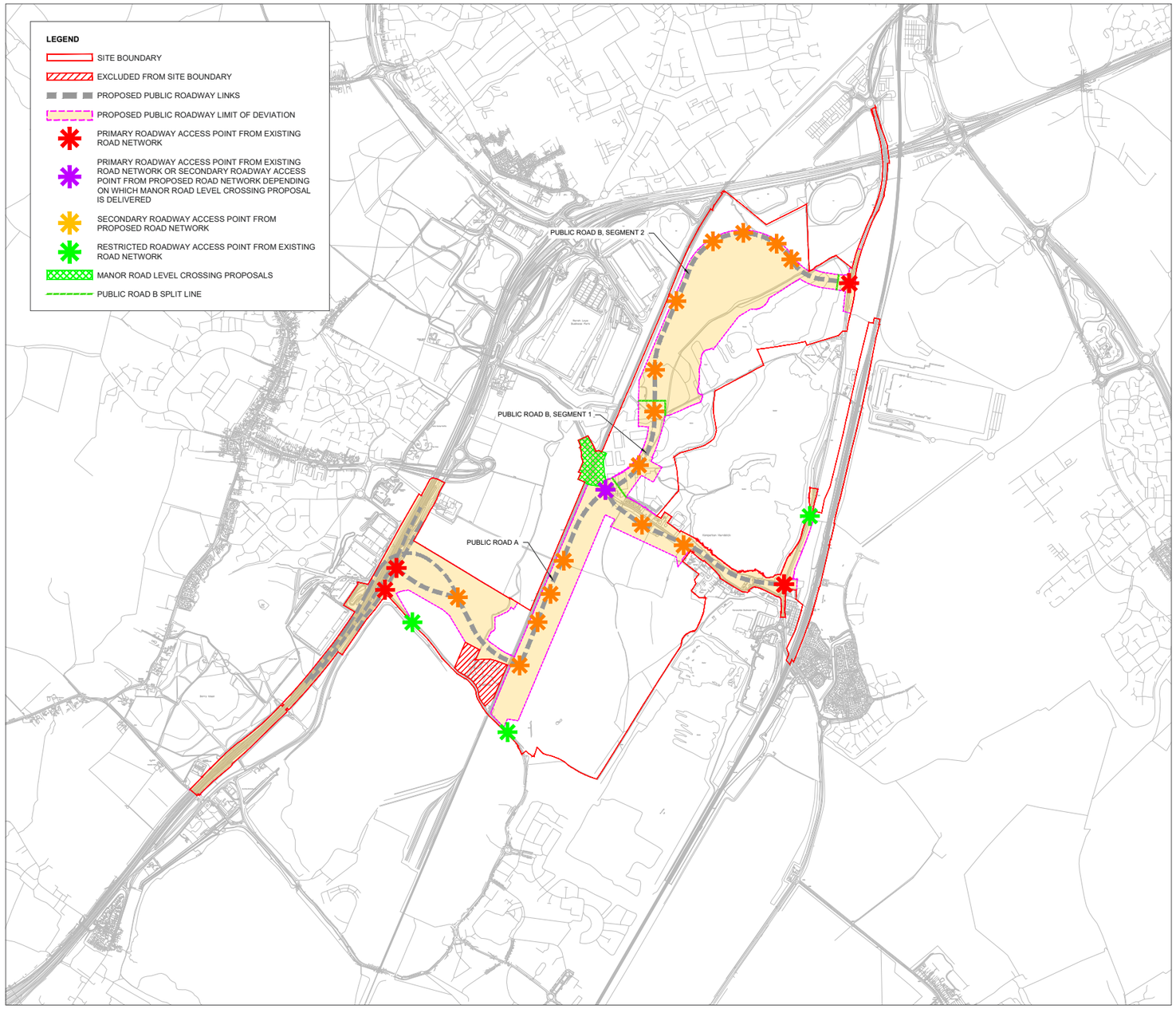


Figure 35: Parameter Plan - Access and roadways (not to scale)

a phone app in place to provide more accessibility information, including ride usability requirements, similar to the ones already in place for its other theme parks around the globe.

9.6 UDX also carries out team member training on accessibility issues. MyAbilities is a Team Member resource group that creates an environment that expands awareness, generates empathy and works for the betterment of its colleagues with varying abilities. In addition, it employs sign language interpreters at its parks who are available at various shows and performances.

Railway Stations

9.7 The station facilities will be designed to be fully accessible to all groups in accordance with Disability and Discrimination Act (DDA) requirements.

Non Motorised Users

9.8 The Proposed Development also includes access by NMUs (non-motorised users). The Proposed Development will deliver a new permeable network of active travel routes east to west and north to south within the Site, usable all year round. The transport corridors across the Proposed Development will be supplemented by new active travel routes providing this permeability across the Site. These new routes have the potential to connect with external routes, and the Proposed Development includes an onward active travel connection along Ampthill Road from the Lake Zone to Interchange Retail Park to connect the Site to Bedford.

9.9 These new routes within the Site offer significantly increased connectivity and ease of access by walking and cycling, compared to the existing footpaths across the Site which offer limited access and are not navigable through much of the year.

9.10 Key elements of connective active travel infrastructure proposed include:

- a new shared footway/cycleway on the B530 Ampthill Road north of a new access into the Lake Zone and linking to the B530/Interchange Way roundabout,

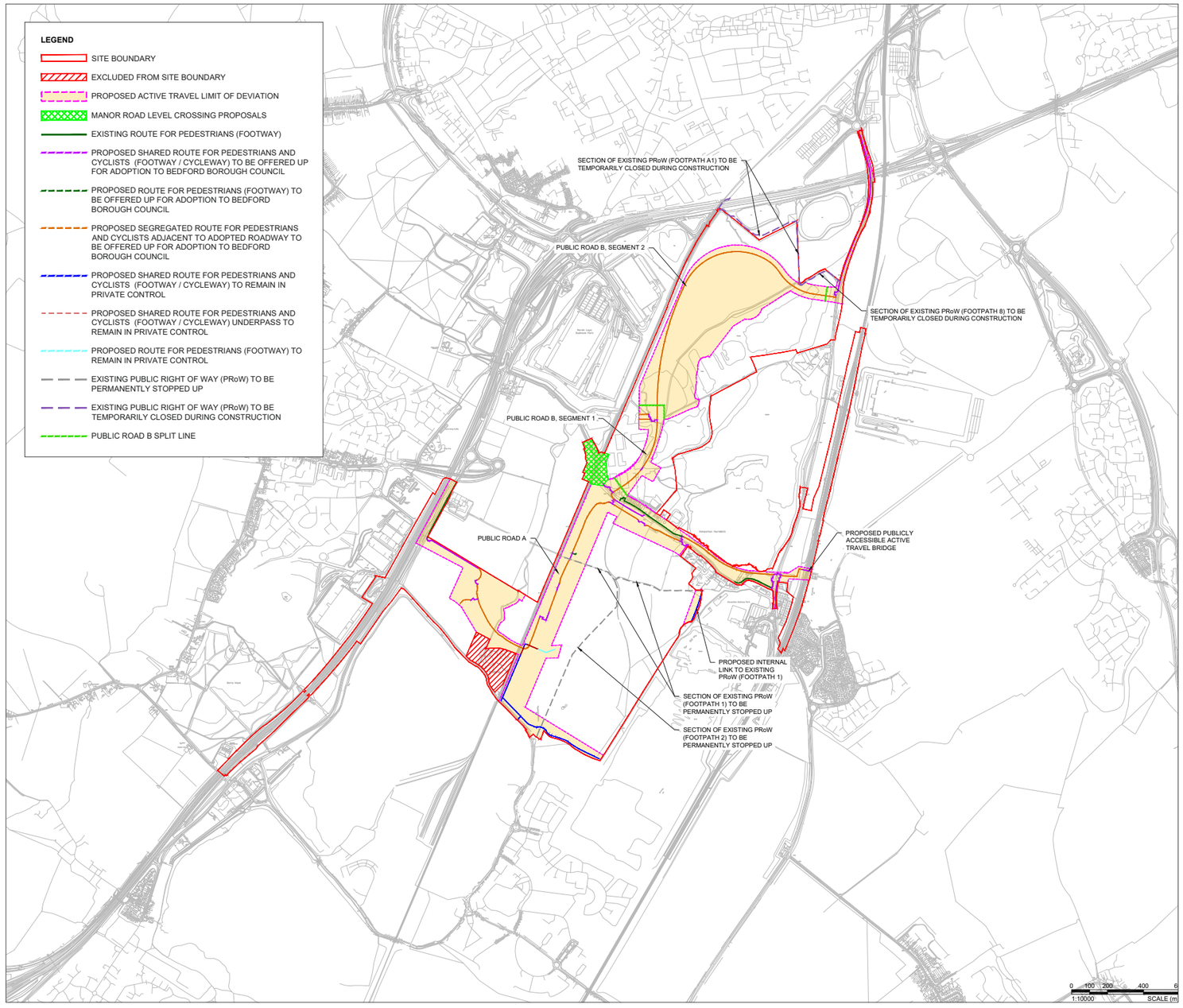


Figure 36: Parameter Plan - Active travel (not to scale)

creating a connection to the existing route into Bedford along the A5141.

- a footbridge over the Midland Main Railway Line at the expanded Wixams Rail Station delivering an important active travel connection across the railway and an alternative to using the underbridge along the B530.

9.11 Further detail is provided in Figure 36 and in the Transport Assessment and Chapter 5 of the ES **(Document Reference 2.5.0)**.

Engagement on Accessibility Issues

9.12 UDX received some excellent feedback from its public engagement exercise which included requests for a number of measures related to accessibility which will be taken into account as the detailed. A summary of the issues raised, and the project response is provided in Table 8.

Table 8: Engagement on Accessibility Issues

Response theme	Project response
Make rides available for those with a physical disability.	Attractions are designed to accommodate a wide range of ages and abilities. Typically, an attraction or roller coaster would have one seat or row that can accommodate guests with walking impairments or wheelchair users.
Ensure assistance dog accessibility.	UDX allows for assistance dog access to all of its sites, other than on certain rides where it would not be safe.
Ensure accessibility for those using wheelchairs.	UDX allows for wheelchair access to all of its sites. Many of its rides also provide for use by wheelchair users (see above).
Ensure accessibility for those with Special Educational Needs and Disabilities (SEND)	All public facing team members have training to enable them to engage with those with SEND needs.
Operate an accessibility scheme such as the sunflower lanyard.	Whilst it will be some time before the Theme Park is open, UDX operate accessibility schemes at their parks and intend to do so here as well.
Design parks from the beginning with accessibility in mind.	Accessibility is key to the design of all of UDX's parks and is integrated from concept design.
Step-free access to railway stations.	All station facilities will be designed to be fully accessible to all groups in accordance with the DDA requirements.
Build rides to accommodate larger people.	Attractions are designed to accommodate a wide range of ages and abilities.
Walkways should be wheelchair user compliant.	Pathways will be wide and smooth, making it easy for guests using wheelchairs or mobility aids to navigate with ease.

10.0 NEXT STEPS

10.1 This DAS has provided a summary of the site context and design process undertaken to date, and explains the process which will be followed to ensure that the development of the detailed design follows the principles of good design and delivers the mitigation relied upon in the EIA.

10.2 The design of the Proposed Development will follow the Design Principles set out in Section 5.0.

10.3 Any overarching planning permission granted pursuant to the planning proposal submission will require the detailed design (some of which may be delivered by further implementing decisions) to comply with the Design Standards and Zonal Design Standards (to be approved), which will ensure that the Proposed Development achieves good design, respects its neighbours and the environment and, where possible, delivers local and regional benefits whilst creating a positive legacy for the future.

10.4 This DAS is not itself a mechanism for securing the design of the Proposed Development. Figure 37 explains the relationship between the different controls that each component of the Proposed Development would comply with and the stage at which they are approved.

Post-Decision Approval Process

10.5 The proposed post-decision approval process is set out in conditions 7-10 of the Proposed Conditions **(Document Reference 1.5.0).** It is anticipated that this process would ensure that the decision-maker has the appropriate level of control over the final appearance of the Proposed Development, whilst enabling sufficient flexibility. This process varies depending on the type and location of development being delivered.

10.6 For the Inner Core Zone (ICZ) (which is principally the Theme Park, amusement park and/or water park), it is anticipated that any planning permission granted would allow UDX to bring forward development provided that it complied with the approved Design Standards (and any other relevant controls), including those relating to height and the open sky concept. It is proposed that approval would be obtained for a Core Zone Perimeter Masterplan which would cover a 10m strip around the perimeter of the Core Zone where there are key interfaces with adjoining areas (see **Proposed Conditions**).

10.7 Prior to commencing all or any portion of the development in the ICZ (save for Permitted Preliminary Works and Site Preparatory Works), the Promoter will submit a verification check confirming how it complies with the Design Standards and any other relevant controls.

10.8 Prior to commencing all or any portion of the development in the Core Zone Perimeter, Lake Zone, East Gateway and West Gateway Zone (save for Permitted Preliminary Works and Site Preparatory Works), the Promoter will submit a Zonal Masterplan and Zonal Design Standards for approval, together with a Compliance Package for verification (comprising Compliance Plans and a Written Statement confirming compliance with any relevant controls).

Table 9: Proposed Post-decision Approval Process

Part of Site/ Component[1]	Zonal / Sub-zonal Masterplan (Approval)	Zonal / Sub-zonal Design Standards (Approval)	Details of External Appearance (Approval)	Written Compliance Statement (Verification)	Compliance Plans (Verification)	Detailed Design Approval
Inner Core Zone (ICZ) [1]	✗	✗	✗	✓	✗	✗
Core Zone Perimeter [1]	✓ *	✓ *	✗	✓	✓ *	Optional
Non-Core Zone [1]	✓ *	✓ *	✗	✓	✓ *	Optional
Buildings and Structures Over 45m [1] (except in ICZ)	✓ *	✓ *	✓	✓	✓ *	Optional
Any Development (except ICZ)**	✗	✗	✗	✓	✗	✓

[1] Save for Permitted Preliminary Works and Site Preparatory Works.

** Unless going straight to detailed design approval.*

*** Only if going straight to detailed design approval*

10.9 In addition, details of external appearance are required for any building or structure over 45m outside of the ICZ.

10.10 There also remains the ability to submit a stand-alone package for detailed design approval for any element of the Proposed Development.

10.11 It is envisaged that where a Zonal Masterplan and Zonal Design Standards have been approved for a relevant zone or sub-zone, a Compliance Package would be submitted for verification, but detailed design approval would not be required. There remains the option however to move straight to detailed design for any development in the Core Zone Perimeter and Non-Core Zones. For this reason, Table 9 indicates that detailed design approval is only optional rather than required.

10.12 The proposed post-decision approval process will secure good design. Approval is not sought at this stage for design in relation to external appearance, with the exception of parameters for height and the articulated skyline, but the approval of Zonal Design Standards, submission of Compliance Plans and/or detailed design approval will enable sufficient control over this.

Consent Controls

10.13 Further, the Proposed Development will be controlled by Operative and Controlling documents, all of which are for approval as part of any planning permission granted, which together with the proposed Description of Development and Proposed Conditions are designed to control the development which could come forward under any planning permission granted. These are illustrated in Figure 37.

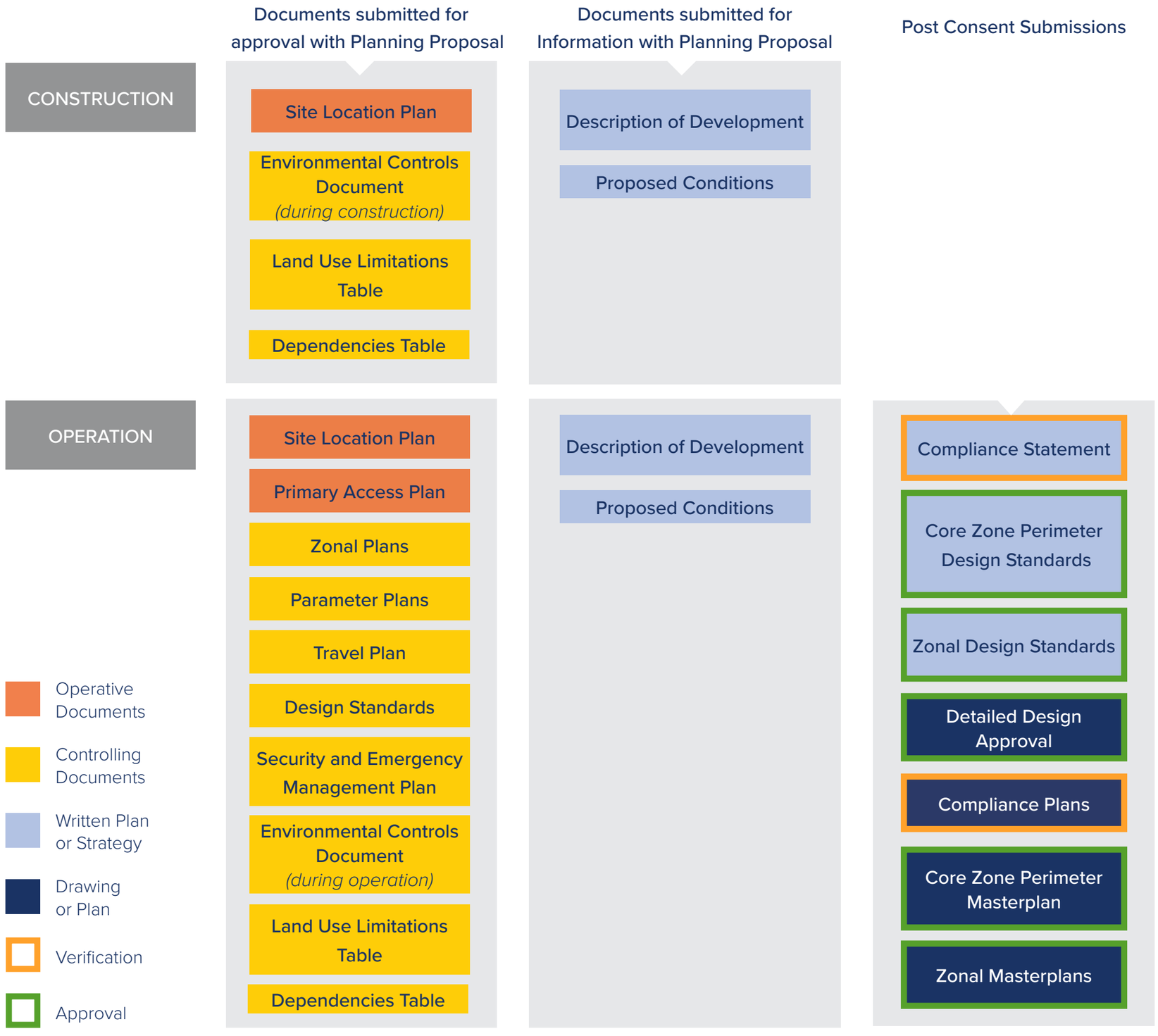


Figure 37: Consent controls diagram

UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT

Former Kempston Hardwick Brickworks and adjoining land, Bedford

Design and Access Statement Appendix 1 - Green Infrastructure Statement

Report reference: 6.2.1.0

Revision number: 00

Date: June 2025

Content

Figures and Tables

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1. Introduction

1.1 Purpose and Document Structure

1.1.1 This Green Infrastructure ("GI") Statement has been prepared on behalf of Universal Destinations & Experiences (UDX) ("the Promoter") which is seeking planning permission for the construction and operation of a Universal Entertainment Resort Complex (ERC), and associated development, in Bedford. The proposal is sponsored by the Department for Culture, Media and Sport ("DCMS"). The Department for Transport ("DfT") and its associated arm's-length bodies have assisted in the development of the highways and rail related elements of the proposal with Bedford Borough Council ("Bedford BC"). The proposal intends to provide sufficient information to enable the Secretary of State for Housing, Communities and Local Government ("MHCLG") to consult on and consider making a planning decision.

1.1.2 The purpose of this GI Statement is to support ecological, social, and economic benefits, ensuring a resilient and well-integrated approach to green infrastructure. It also pulls together the information on the delivery of green and blue infrastructure from various places within the planning proposal documents in one place to demonstrate the cohesive strategy being proposed. By referencing the principles established in Natural England's ("NE") GI Framework, this GI Statement demonstrates how the Proposed Development responds to the identified key benefits:

- **Protect and enhance natural capital:** Develop strategies that conserve and enhance the area's existing habitats and biodiversity, ensuring sustainable management of natural resources.
- **Deliver ecosystem services:** Create nature-rich environments that provide benefits such as enhanced air and water quality, flood risk management, and climate resilience.
- **Support local communities:** Provide accessible and well-designed green spaces that enhance community well-being, health, and recreational opportunities.
- **Foster sustainability:** Use the Urban Greening Factor (UGF) as a tool to inform design decision-making promoting sustainable development practices that balance environmental considerations with urban growth.
- **Align with broader strategies:** Support and align with the Local Nature Recovery Strategy (LNRS) and contribute to the Nature Recovery Network (NRN), advancing efforts to restore and connect wildlife-rich habitats.

1.1.3 This GI Statement demonstrates the Proposed Development's commitment to delivering a long-term, integrated approach that benefits people, places, and nature, setting an example for large-scale projects to follow.

Document Structure

1.1.4 This GI Statement is an Appendix to the Design and Access Statment following the step by step process of integrating GI in the design development. There is a supporting Annex 1 document for further details highlighted in this GI Statement.

1.1.5 This GI Statement is not in itself a controlling document to deliver mitigation, but the principles within it are delivered by other controlling and supporting documents, which include the following:

- Environmental Statement Appendix 10.3 : Archaeological Mitigation Strategy | Document Reference 4.10.3.0
- Environmental Statement Appendix 12.1 Section 6 and 7 : Flood Risk Assessment | Document Reference 4.12.1.0
- Environmental Statement Appendix 12.2 Section 4 and 7 : Water Strategy | Document Reference 4.12.2.0
- Environmental Statement Appendix 12.3 Section 5 and Annex 1, 2 and 3 : Drainage Strategy | Document Reference 4.12.3.0
- Environmental Statement Appendix 14.1 : Whole Life Carbon Management Strategy | Document Reference 4.14.1.0
- Arboricultural Impact Assessment Appendix C: Tree Removal and Protection Plan | Document reference 6.11.3.0
- Security and Emergency Management Plan | Document reference 6.4.2.0
- Employment and Skills Strategy | Document reference 6.12.0
- Design Standards | Document reference 6.3.0

The structure of this document is outlined as:

1. Introduction: Overview of the Proposed Development, the purpose and structure of the GI Statement, and outlines the approach to the GI Strategy and Evaluation.

2. Context: The context is an overview of the policy which has been used to support the development of the Site. Mapping of the area shows the landscape form and identity, access and connectivity, as well as how blue and green infrastructure connects with the site. In addition, it includes visual analysis of the site and its surroundings.

3. GI Strategy: Outline of the strategic approach for delivering high-quality, multifunctional green infrastructure within the Proposed Development. This section highlights the key spatial moves and the GI proposal.

4. Green Infrastructure Evaluation: Assessment of the Proposed Development using four key metrics to measure its effectiveness and contribution to the environment and community: Accessible Green Space, Urban Nature Recovery, Urban Greening Factor and Urban Tree Canopy Cover.

5. Conclusions: A summary of the GI Strategy, highlighting its benefits and the key findings from the GI Evaluation. Additionally, the conclusions address how the Proposed Development aligns with Natural England's 'What' Principles, which define the essential characteristics of high-quality GI under its GI Framework.

Figure 1: GI Statement 'Look and Feel' Composite

1.2 Project Overview

1.2.1 The Site is located south-west of Bedford, Bedfordshire and is broadly to the east of the A421 and west of the Midland Main Line and is on the former Kempston Hardwick brickworks and agricultural land. The Site is divided into four main land areas referred to as the Core Zone, Lake Zone, West Gateway Zone, and East Gateway Zone. The proposed ERC lying within these zones would allow a theme park and associated uses including retail, dining, entertainment; visitor accommodation; sport, recreation, leisure and spa facilities; venues with conference and convention spaces; associated services and uses for any operational or administrative functions; utilities generation, storage, collection, treatment, and processing facilities associated with the ERC; vehicle and cycle parking, maintenance and servicing, and transportation hubs; access routes and circulation spaces; landscaping; utility infrastructure; and use of land necessary to support construction.

1.2.2 **Core Zone** – this central portion of the Site is primarily comprised of agricultural fields. The north, Core Zone is bounded by Manor Road and to the west by the existing Marston Vale railway line (including the existing Kempston Hardwick rail station). To the south the Zone borders Broadmead Road and to the east the former Coronation Pits and the Kempston Court industrial area.

1.2.3 **Lake Zone** – the northernmost portion of the Zone is comprised of the former Kempston Hardwick Brickworks and partially flooded pits. To the west the Lake Zone extends to the existing Marston Vale railway line and an area of large warehouses. The eastern section borders the former Kempston Hardwick Pits, an existing employment area including cement plants, and the B530 (Ampthill Road). To the south the Lake Zone extends to Manor Road.

1.2.4 **East Gateway Zone** – the easternmost part of this Zone includes an existing wooded area, a partially developed parcel and number of industrial units ranging from a cement plant to a car auction site along Manor Road. It is bordered by the B530 (Ampthill Road) to the west and the village of Wixams to the east. The Midland Main Line railway runs along the eastern edge, alongside the existing Manor Road right of way and a wooded area to the north.

1.2.5 **West Gateway Zone** – the westernmost area of the West Gateway Zone is comprised of an agricultural field and bounded to the north by open agricultural fields. To the west this Zone extends to the A421 and Woburn Road and to the south to Broadmead Road. The eastern side of the Zone is bounded by the Core Zone, within which is the principal access to the ERC via the A421.

1.2.6 The Planning Proposal also includes a series of infrastructure improvements including:

- a new A421 junction;
- an expanded railway station on the Thameslink/ Midland Main Line at Wixams;
- improvements to Manor Road; and
- improvements to certain other local roads.

1.2.7 It also safeguards land for a potential new railway station on the proposed EWR Bletchley to Bedford line, should this come forward in the future.

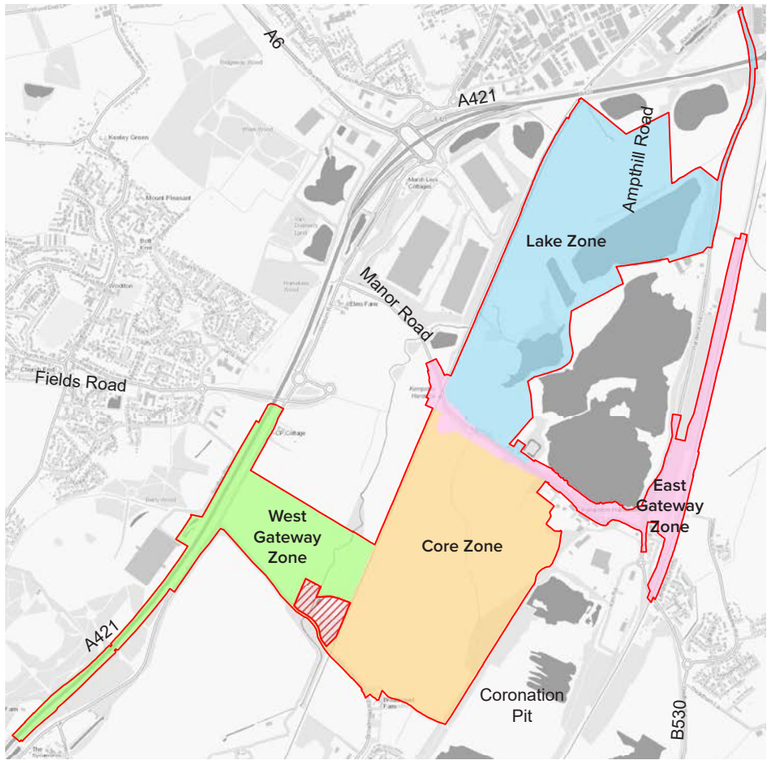


Figure 2: Zonal Plan of the Site

1.2 Project Overview

Now more than ever before, people are recognising the importance of nature and the value of public realm.

1.2.8 The importance of good design is widely acknowledged - the National Planning Policy Framework (December 2024) ("NPPF") states that *'the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve'*.

1.2.9 In infrastructure, 'Good design' refers to the process by which a Proposed Development is developed, as well as the final outcome which is delivered as a result. This involves multidisciplinary teams working collaboratively towards a common shared objective and thinking creatively to solve problems.

1.2.10 UDX is committed to delivering good design for the Site, ensuring that the Proposed Development responds to its setting, is long-lasting, and that wider benefits are realised beyond the Proposed Development's primary function. This commitment has been embedded in the development of the Site Wide Design Principles (Figure 4) and GI Strategy.

Key Principles of Good Design

1.2.11 The Proposed Development is guided by key design principles that enhance visitor experience while balancing the needs of both people and nature. The design promotes active travel and incorporates Nature-based Solutions (NbS) to support environmental resilience.

1.2.12 At UDX, creating a world-renowned Universal ERC is at the forefront. A unique and dynamic visitor experience is central to this vision, evolving continuously to drive interest and encourage repeat visits. Guests at the Proposed Development will be immersed in diverse, carefully designed spaces that reflect the high standards expected from a Universal destination.

1.2.13 By embracing placemaking principles, the Proposed Development strengthens the connection between people, both visitors and local residents, and the Site and its surroundings by promoting better landscape design and facilitating creative patterns of use.

1.2.14 UDX recognises the relevance of local context. The Proposed Development integrates sympathetic and appropriate design solutions. There is a focus on active mobility improving access by offering a variety of affordable, reliable and sustainable travel options in and around the Theme Park.

1.2.15 In the Proposed Development, NbS proposals are likely to have a positive impact on the local environment while also reducing climate change risk. For example, green infrastructure and landscape proposals will have a cooling effect on the Site which will help reduce the local temperature during heatwaves. Similarly, implementing a sitewide surface water drainage strategy that has been designed in accordance with the most recent Environment Agency (EA) Climate Change Guidance and providing enhancements to water bodies in alignment with the natural drainage of the Site will mitigate flood risk from extreme precipitation events.

Figure 3: Principles of 'Good Design'

1.2 Project Overview

SITE WIDE DESIGN PRINCIPLES

1.2.16 UDX will create a world-renowned Universal ERC in the UK through creative ideation, rigurous planning, and committed partnerships with governments and local communities.

1.2.17 The key principles of 'good design' for this project focus on creating a unique visitor experience that balances the needs of people and nature while promoting active travel and integrating of NbS.

1.2.18 By carefully evaluating these principles in conjunction with a deep understanding of the physical and policy context, UDX has developed Design Principles that reflect its aspirations and align with national and regional policies and guidance.

1.2.19 These Site Wide Design Principles support the overall vision and guide the ERC's design development, ensuring that opportunities to address key challenges are identified and integrated into the Proposed Development.

1.2.20 The Site Wide Design Principles are organised around the key principles of 'good design' - Experience, People, Nature and Place - as illustrated in Figure 4, and described overleaf.

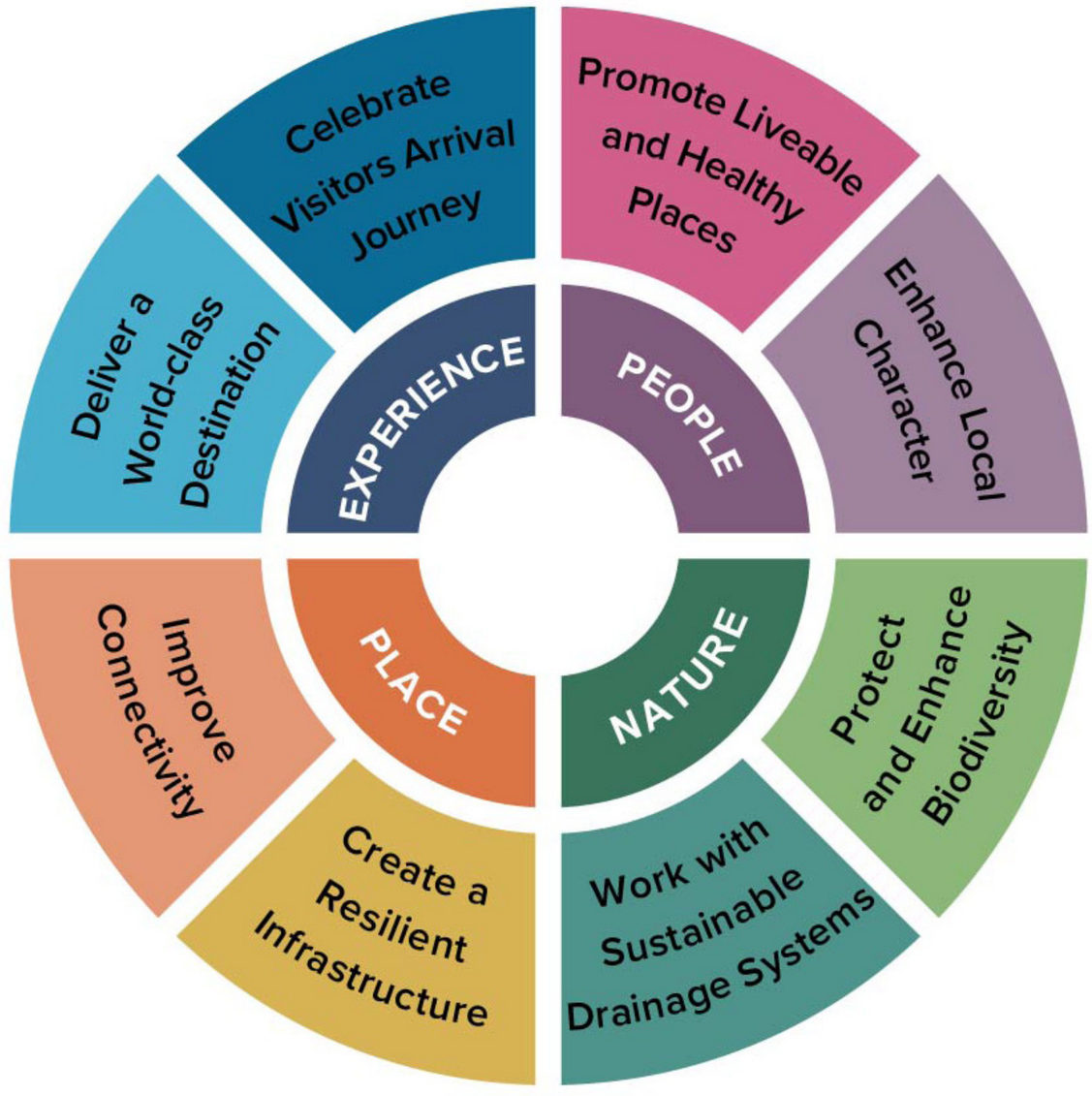


Figure 4: Site Wide Design Principles

1.2 Project Overview

SITE WIDE DESIGN PRINCIPLES

Deliver a World-class Destination

1.2.21 The Proposed Development will create a world-class destination that seamlessly integrates diverse experiences for local, regional, and international guests. By offering a dynamic blend of cultural, recreational, and hospitality spaces, the development will enhance visitor engagement while fostering social and economic vibrancy.

1.2.22 Thoughtful design and high-quality placemaking will ensure a destination that is accessible, inclusive, and globally recognised for its unique character and appeal.

Celebrate Visitors' Arrival Journey

1.2.23 The Proposed Development will prioritise a seamless and intuitive arrival experience, creating a welcoming and memorable journey for all visitors. By integrating clear wayfinding, engaging landscapes, and a thoughtfully designed circulation network, the arrival sequence will enhance guest comfort and connectivity.

1.2.24 This approach will establish a sense of place from the moment of arrival, ensuring a cohesive and immersive experience throughout the destination.

Promote Liveable and Healthy Places

1.2.25 The Proposed Development aims to support active lifestyles and enhance community cohesion, providing accessible & inclusive places for people that are legible and well-connected. Encouraging greater visitor numbers from all sectors of the wider community will improve passive surveillance.

1.2.26 The Proposed Development envisions creating dynamic spaces for people while also incorporating nature, ensuring a balance between urban development and green infrastructure.

Enhance Local Character

1.2.27 The Proposed Development will celebrate the local character by revealing and conveying the diverse and unique qualities of the area through interpretation, materials and colour for example. This will help to foster pride for local communities and enhance visitor experience.

1.2.28 The design will establish clear and distinctive characteristics that help to establish engagement and connection referencing natural and cultural heritage for example will create a richer and more meaningful experience for all.

Protect and Enhance Biodiversity

1.2.29 The Proposed Development will protect and enhance biodiversity by improving the natural environment as a whole within the Site, delivering multiple benefits where possible. These include creating new habitats and ecological networks, supporting climate adaptation with resilient planting and vegetation, improving air quality and reducing pollution with tree canopy cover, and promoting healthier lifestyles through active travel networks.

1.2.30 Integrating an ecologically informed design principle will ensure that urban greening initiatives offer sustainable and thriving habitats for biodiversity throughout the Proposed Development.

Work with Sustainable Drainage Systems

1.2.31 The Proposed Development will incorporate sustainable drainage systems to effectively manage stormwater runoff and mitigate flood risk while reducing economic impacts by managing surface water at its source, in turn reducing dependency on large scale drainage infrastructure. Designed to respond to climate change like a sponge, the Proposed Development will dynamically absorb and adapt to environmental changes.

1.2.32 This approach will not only improve water quality but also provide a cost-effective and environmentally sustainable solution.

Create a Resilient Infrastructure

1.2.33 The Proposed Development aims to create a sustainable and resilient infrastructure that responds to environmental challenges while supporting thriving communities. The design will prioritise carbon neutrality by reducing energy emissions, capturing carbon, and integrating circular economy practices to minimise environmental impact.

1.2.34 Additionally, enhancing seamless and sustainable mobility options will contribute to a more adaptable and future-ready infrastructure.

Improve Connectivity

1.2.35 The Proposed Development will enhance connectivity within the Proposed Development. This will benefit both people and wildlife by promoting active travel, improving quality of life, and supporting physical and mental well-being for visitors and local communities.

1.2.36 Additionally, the Proposed Development will strengthen ecological connectors, preserving and enhancing vital natural connections to support biodiversity and maintain a healthy ecosystem.

1.3 The Need for a Green Infrastructure Statement

Climate change, biodiversity loss, public health and social equity are important issues at present.

1.3.1 Humanity is facing complex global and social challenges, requiring us to think differently - the business as usual approach is no longer enough. Climate change is reshaping our cities, impacting environmental, cultural, social, and economic factors. Fortunately, regional initiatives are stepping up, implementing plans, actions, and projects to adapt to and mitigate the effects of climate change across various scenarios.

1.3.2 The Proposed Development presents an opportunity to rethink the way we design our public realm and build more resilient, greener and active communities.

What is Green Infrastructure?

1.3.3 The NPPF defines GI as:

'A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity'.

Similarly, Natural England (NE) expands on GI by highlighting:

'this network includes familiar features such as street trees, parks, gardens, wildlife areas, waterways and sustainable drainage systems which benefit our day-to-day life'.

1.3.4 GI encompasses a wide range of green spaces, from street trees, green roofs, and private gardens to parks, woodlands, wetlands, and sustainable drainage systems, functioning at both local and regional scales.

1.3.5 GI can also include linear features such as roadside verges, field margins, access routes, and waterways, all contributing to a connected and resilient ecosystem.

1.3.6 By integrating GI into urban and rural planning, particularly through new developments, upgrades, and retrofitting in areas with poor green space provision, it enhances biodiversity, supports climate resilience, and promotes healthier, more attractive places to live and work.

1.3.7 GI is closely linked to Natural Capital, as it represents a collection of natural assets that deliver ecosystem services, and it plays a crucial role in urban and rural sustainability.

1.3.8 NE's GI Framework helps optimise habitat functionality, ensuring that green spaces serve both nature and communities effectively, while standards like UGF guide urban developments to maximise environmental benefits.

1.3.9 Additionally, GI strategies align with Local Nature Recovery Strategies (LNRS) required pursuant to the Environment Act 2021, facilitating coordinated conservation efforts and contributing to a Nature Recovery Network (NRN) that enhances landscape character and connectivity.

1.3 The Need for a Green Infrastructure Statement

Good quality GI has an important role to play in our urban and rural environments for improving health and wellbeing, air quality, nature recovery and resilience to and mitigation of climate change, along with addressing issues of social inequality and environmental decline.

1.3.10 NE's GI Framework introduces 15 GI Principles outlining what constitutes good green infrastructure through the 'What' Principles, explaining its significance through the 'Why' Principles, and providing guidance on effective implementation through the 'How' Principles.

1.3.11 The 'What' Principles define the key characteristics of high-quality GI. Well-designed GI is multifunctional, diverse, interconnected, accessible, and reflective of local character. By integrating nature with active travel routes, enhancing biodiversity, and establishing a well-connected network of green and blue spaces, GI benefits both people and wildlife while maintaining the distinct identity of the landscape.

1.3.12 The 'What' Principles are summarised as follows:

- **Multifunctional**, GI should deliver a range of functions and benefits for people, nature and places, address specific issues and meet their needs. Multifunctionality (delivering multiple functions from the same area of GI) is especially important in areas where provision is poor quality or scarce.
- **Varied**, GI should comprise a variety of types and sizes of green and blue spaces, green routes and environmental features (as part of a network) that can provide a range of different functions, benefits and solutions to address specific issues and needs.
- **Connected**, GI should function and connect as a living network for people and nature at all scales (e.g. within sites, and across regions/at national scale). It should enhance ecological networks and support ecosystem, connecting provision of GI with those who need its benefits.
- **Accessible**, GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, green spaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all.
- **Responds to Local Character,** GI should respond to an area's character so that it contributes to the conservation, enhancement and/or restoration of landscapes; or, in degraded areas, creates new high-quality landscapes to which local people feel connected.

1.3.13 The 'Why' Principles are summarised as follows:

- **Nature-rich, beautiful places,** GI supports nature to recover and thrive everywhere, in towns, cities and countryside, conserving and enhancing natural beauty, wildlife and habitats, geology and soils, and our cultural and personal connections with nature.
- **Active and healthy places,** GI supports active lifestyles, community cohesion and nature connections that benefit physical health, mental health & wellbeing and quality of life. GI also helps to mitigate health risks such as urban heat stress, noise pollution, flooding and poor air quality.
- **Thriving and prospering communities,** GI helps to create and support prospering communities that benefit everyone. It adds value by creating quality environments that are attractive to businesses and investors, creates green jobs, supports retail and high streets, and helps support the local economy and regeneration.
- **Improved water management,** GI reduces flood risk, improves water quality and natural filtration. It helps maintain the natural water cycle and sustainable drainage at local and catchment scales, reducing pressures on the water environment and infrastructure, bringing amenity, biodiversity, economic and other benefits.
- **Resilient and climate positive places,** GI makes places more resilient and adaptive to climate change and helps to meet zero carbon and air quality targets. GI itself should be designed to adapt to climate change to ensure long term resilience.

1.3.14 The 'How' Principles are summarised as follows:

- **Partnership and vision,** Work in partnership, and collaborate with stakeholders from the outset to plan, develop and deliver a vision for GI in the area. Engage a diverse and inclusive range of people and organisations including citizens, local authorities, developers, communities, landowners, greenspace managers, environmental, health, climate, transport and business representatives,
- **Evidence,** Use scientific evidence, and good land use practices when planning and enhancing green and blue infrastructure. Understand the benefits of current green infrastructure assets; and the data on the environmental, social & economic challenges and needs of the area.
- **Plan strategically,** Plan strategically and secure GI as a key asset in local strategy and policy, at all scales. Fully integrate and mainstream GI into environmental, social, health and economic policy. Create and maintain sustainable places for current and future populations, and address inequalities in GI provision.
- **Design,** Understand an area's landscape/townscape, natural, historic and cultural character to create well-designed, beautiful and distinctive places.
- **Managed, valued, monitored and evaluated,** Plan good governance, funding, management, monitoring, and evaluation of GI as a key asset from the outset and secure it for the long-term. Make the business case for GI. Engage communities in stewardship where appropriate. Celebrate success and raise awareness of GI benefits.

1.3 The Need for a Green Infrastructure Statement

1.3.15 Furthermore, Natural England's GI Framework introduces five (5) Headline Standards to enhance both the quantity and quality of green infrastructure. These standards align with the GI Framework supporting the delivery of its 15 GI Principles:

S1. Green Infrastructure Strategy, emphasises the need for major developments to incorporate a GI Strategy that demonstrates how the project will deliver the 15 GI Principles and GI Standards, aligning with local green infrastructure policies, development plans, and design codes. This document will deliver a GI Strategy for the Proposed Development.

S2. Accessible Green Space, establishes criteria for ensuring that major developments provide accessible green spaces that meet community needs.

S3. Urban Nature Recovery, defines how developers should contribute to nature recovery through habitat creation, restoration, and biodiversity enhancements.

S4. Urban Greening Factor (UGF), specifies the minimum UGF score that major developments should achieve to promote urban greening and ecological resilience.

S5. Urban Tree Canopy Cover, sets expectations for tree canopy coverage in major developments.

1.3.16 These standards provide a clear framework to ensure that new developments actively contribute to sustainable, biodiverse, and resilient urban environments.

1.4 Approach

1.4.1 This GI Statement follows the principles set out in NE's GI Framework. The following steps outline the GI Assessment methodology:

1. Baseline

Policy Context:

1.4.2 This GI Statement has been prepared with regard to the national and local policies outlined below. The Planning Statement (Document Reference 6.1.0) provides an assessment of compliance of the Proposed Development with national and local planning policy.

GI Assets:

1.4.3 The baseline analysis incorporates GI Assets - mapping and context analysis to identify the areas that have the most pressing needs and those with potential to provide multiple benefits. This context analysis comprises the following mapping:

- *Landscape Form and Identity:* topography, setting, natural and cultural heritage, landscape types, demographics, and urban identity areas.
- *Access and Connectivity:* walking, cycling and equestrian routes, and sustainable transport along key destinations such as green open spaces, education and culture and businesses, and deprivation.
- *Nature-based Systems:* green network and key habitats, and blue network including flooding and surface water flooding risks, viewpoints analysis, and assessing the current masterplan.

Visual Analysis & Review of the LVIA:

1.4.4 A site walkover was undertaken (13th-15th March 2024) to analyse how the Proposed Development will have an impact on views of the Site.

2. Design Principles

1.4.5 This section incorporates a clear set of Design Principles to guide sustainable, context-sensitive GI planning and design, through incorporation of Natural England's 'What' principles and Principles of Good Design. The Design Principles will serve as a framework to define what success looks like for this development.

3. Spatial Strategy

1.4.6 The spatial strategy translates the Design Principles into a practical, site-specific approach by developing key Green Infrastructure spatial moves that are informed by the opportunities and constraints identified.

4. GI Evaluation

1.4.7 The evaluation is assessed using Natural England's four key standards: Accessible Green Space, Urban Nature Recovery, Urban Greening Factor, and Urban Tree Canopy Cover. This evaluation quantifies and qualifies the Proposed Development's environmental performance and alignment with GI objectives.

5. Conclusion

1.4.8 This section details the GI Strategy's application of key Design Principles to formulate site specific spatial interventions. An evaluation will be presented of this strategy against Natural England's GI Framework Standards (S2-S5), and a analysis of how the GI Strategy directly responds to NE's 'What' Principles.

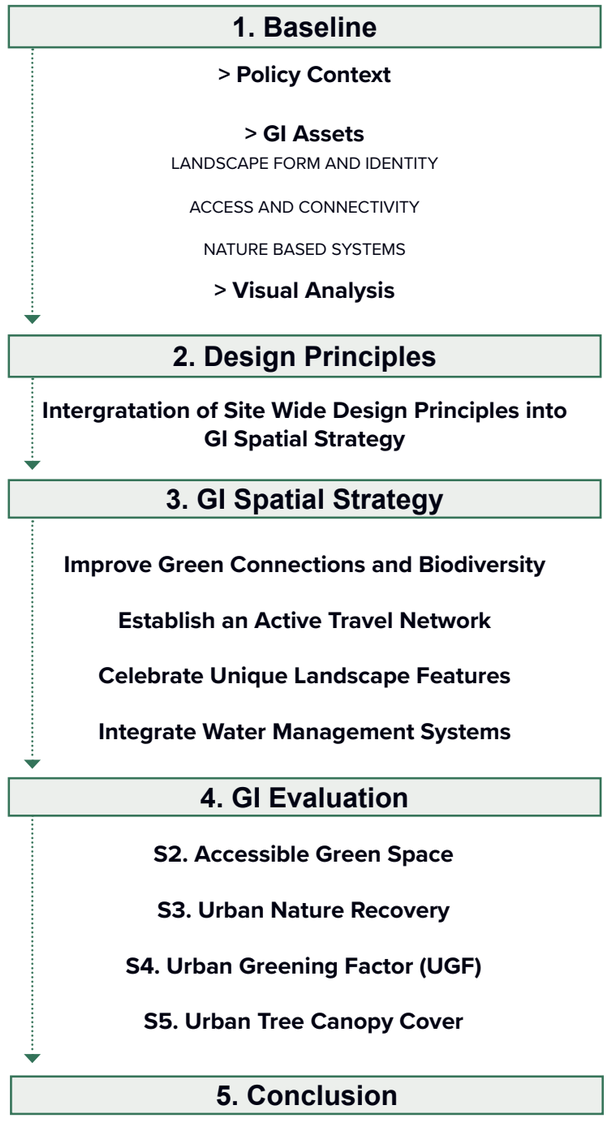


Figure 5: GI Statement Approach Diagram

1.5 Key Reference Documents

1.5.1 The GI Statement has been informed by the following documents:

- **30 By 30 |** The Wildlife Trusts 2020
- **A Green Future: Our 25 Year Plan to Improve the Environment**
- **Bedford Borough Local Transport Plan |** Bedford Borough Council 2021
- **Bedford Borough Health and Wellbeing Strategy |** Bedford Borough Council2018-2023
- **Bedford Borough the Place to Grow: Bedford Borough Corporate Plan |** Bedford Borough Council 2017-2021
- **Bedford Green Infrastructure Plan |** Bedford Borough Council 2009
- **Bedford Local Plan 2030 |** Bedford Borough Council 2020
- **Bedfordshire Local Nature Recovery Strategy (LNRS) |** Bedfordshire Council WIP
- **Cycle Infrastructure Design (LTN 1/20) |** Department of Transport
- **Forest of Marston Vale: Design Guidance Supplementary Planning Document (SPD)** | Central Bedfordshire 2022
- **National Planning Policy Framework** | Ministry of Housing Communities and Local Government 2024
- **National Design Guide** | Ministry of Housing Communities and Local Government 2021
- **Natural England Green Infrastructure Framework |** Natural England 2023
- **Sustainable Community Strategy |** Bedford Borough Council 2009 – 2021
- **The Greenbook: Central Government Guidance on Appriasal and Evaluation** | HM Treasury 2022

1.5.2 Furthermore, this document is intended to be read in conjunction with the following suite of documents which also accompany the Planning Proposal:

- **Environmental Statement Appendix 10.3 : Archaeological Mitigation Strategy |** Document Reference 4.10.3.0
- **Environmental Statement Appendix 12.1 Section 6 and 7 : Flood Risk Assessment |** Document Reference 4.12.1.0
- **Environmental Statement Appendix 12.2 Section 4 and 7 : Water Strategy |** Document Reference 4.12.2.0
- **Environmental Statement Appendix 12.3 Section 5 and Annex 1es 7 and 8 : Drainage Strategy |** Document Reference 4.12.3.0
- **Environmental Statement Appendix 14.1 : Whole Life Carbon Management Strategy** | Document Reference 4.14.1.0
- **Arboricultural Impact Assessment Appendix C: Tree Removal and Protection Plan |** Document reference 6.11.3.0
- **Security and Emergency Management Plan** | Document reference 6.4.2.0
- **Employmnet and Skills Strategy** | Document reference 6.12.0

Design Standards | Document reference 6.3.0

- **Environmental Statement Appendix 6.Badger Survey Report CONFIDENTIAL |** Document Reference 4.6.3.0
- **Environmental Statement Chapter 6 : Ecology and Nature Conservation |** Document Reference 6.6.0
- **Environmental Statement Appendix 6.4: Outline Habitat Creation and Enhancement Plan |** Document Reference 4.6.4.0
- **Environmental Statement Appendix 7.6: Detailed Visual Impact Assessment |** Document Reference 4.7.6.0
- **Environmental Statement Appendix 6.10 Interim Bat Roost Appraisal Report |** Document Reference 4.6.10.0
- **Landscape Strategy and UGF |** Landscape Strategy and UGF-320-1000-P-LV101- 112
- **Environmental Statement Appendix 6.5: Outline Landscape and Ecology Management Plan |** Document Reference 4.6.5.0
- **Environmental Statement Figure 7.10: Tree Removal Plan |** Document Reference 3.7.10.0
- **Active Travel Plan** | Proposed and Retained Active Travel Routes Plan P320-VEC-HGN-SW-SK-CH-0207

2. Context

2.1 Policy and Guidance

NATIONAL

2.1.1 This GI Statement aligns with national policies that promote sustainable development, environmental enhancement, and high-quality place-making. It supports a strategic approach to integrating GI, ensuring resilience, accessibility, and ecological improvement.

National Planning Policy Framework

2.1.2 The NPPF provides an approach to conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure.

2.1.3 Paragraph 135 indicates that planning policies and decisions should ensure that developments:

- (a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- (d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- (e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- (f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

2.1.4 As it has been adhered to in the scheme, Paragraph 135 has been embedded into the GI Statements design proposals and key spatial moves.

The Green Book: Central Government Guidance on Appraisal and Evaluation

2.1.5 The government Green Book provides guidance on appraising policies, programmes, and projects. Although this guidance concerns to the provision of objective advice by public servants to decision makers, UDX recognises the importance of the Green Book's recommendation for a natural capital approach to assess and value effects on the natural environment.

2.1.6 Natural capital refers to natural resources and ecosystems, both living and non-living, that provide valuable services to society, such as forests, rivers, and minerals. These resources generate ecosystem services over time, contributing to human well-being alongside other forms of capital (human, produced, social). These services support a range of benefits such as timber or water, non-market uses such as recreation or landscape amenity, and non-use values such as the value people place on the existence of particular habitats or species.

2.1.7 Protecting and enhancing natural capital is one of the key benefits identified by NE in their GI Framework, which has been utilised to guide the development of this GI Statement.

National Design Guide

2.1.8 The National Design Guide sets out the characteristics of well-designed places and demonstrates what good design means in practice. The National Design Guide is not a legally binding document but rather illustrates how well designed public spaces can be achieved which has been referenced for the GI Statement.

30 By 30

2.1.9 The Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire has adopted a 5-year strategy to designate 30% of the land in the region as a nature recovery network by 2030 in accordance with the High Ambition Coalition for Nature & People 30 x 30 mandate which the UK Government signed up to in 2020.

2.1.10 30 by 30 initiative is an ambitious objective to guide developers in nature recovery, and serves as a contextual document for the GI Statement.

2.1 Policy and Guidance

REGIONAL

2.1.11 The GI Statement also aligns with regional policies that emphasise landscape protection, biodiversity enhancement, and sustainable development. It supports strategic initiatives to improve connectivity, manage natural assets, and integrate environmental, social, and economic benefits. The statement will be considered alongside regional strategies to ensure a cohesive approach to green infrastructure planning and implementation.

Bedford to Milton Keynes (Marston Vale) Area

2.1.12 The Bedford to Milton Keynes (Marston Vale) area is shaped by its industrial heritage, including former brickworks and current brickpit landfill sites. Key green infrastructure features include:

- Forest of Marston Vale: A community forest with Millennium Country Park.
- Green Gateway: Woodland network between Wootton and Kempston.
- Recreational routes: National Cycle Route 51, Bunyan Trail, and Clay Way.
- Elstow Brook: A waterway with wetland sites linked to flooded brickpits.
- Ancient woodlands: Wootton, Kempston, Ramson's, Astey, Hanger, and Oxleys Woods.

2.1.13 There are a range of green infrastructure opportunities across the area, which will bring about significant change to its character.

- Forest of Marston Vale: Increase woodland cover to 30% by linking and expanding woodlands.
- Green Gateway: Extend woodlands to provide green spaces and buffer developments.
- Bedford to Milton Keynes Waterway: Connect Grand Union Canal to River Ouse with a multifunctional green corridor.
- Elstow Brook: Link wetlands, enhance biodiversity, and create a green corridor for flood control and recreation.
- Access improvements: Upgrade Bedford Green Wheel, Clay Way, Bunyan Trail, and National Cycle Route 51.
- Ancient woodlands: Expand and buffer existing woodlands.
- Highway impact mitigation: Create green corridors to reduce noise, improve tranquillity, and boost biodiversity.
- Sustainable transport: Develop green links between Wixams and Bedford.
- Brickpit and borrow pit lakes: Enhance landscape, access, and biodiversity.
- New habitats: Create ponds, hedgerows, and hedgerow trees.

Bedfordshire Local Nature Recovery Strategy (LNRS) - *WIP*

2.1.14 The Bedfordshire Local Nature Recovery Strategy (LNRS) is currently under development. This LNRS is a strategic plan aiming to identify and implement actions to restore, protect, and enhance the natural environment across Bedfordshire. The strategy focuses on mapping valuable existing areas for nature, agreeing on priorities for nature recovery, and proposing areas for creating or improving natural habitats.

Forest of Marston Vale: Design Guidance Supplementary Planning Document (SPD)

2.1.15 This Development Design Guidance, adopted as a Supplementary Planning Document (SPD), supports planning policies for the Forest of Marston Vale, spanning 61 square miles between Bedford and Milton Keynes. Jointly produced by the Forest of Marston Vale Trust, Central Bedfordshire Council, and Bedford Borough Council, it provides guidance on green infrastructure and design principles to ensure new developments enhance the Forest's growth, wooded landscapes, and unique character.

2.1 Policy and Guidance

LOCAL

2.1.16 While the Proposed Development is not required to align with local policy, proposals will integrate with the Local Plan to ensure a coordinated approach to sustainable growth and green infrastructure. The Local Plan provides a framework for enhancing biodiversity, improving connectivity, and delivering environmental benefits, which this development will support through its design and implementation.

Bedford Local Plan (2030)

2.1.17 The Bedford Local Plan (2030) aims to deliver sustainable, high-quality growth that meets the needs of urban and rural communities while addressing climate and economic challenges.

Key Objectives and Principles:

- Deliver high quality growth that will facilitate the development of more **sustainable** and **inclusive** places for local communities, which are equipped to respond to the **impacts of climate and economic change** and offer the opportunity to live more healthy lifestyles.Where it is viable and sustainable to do so, encourage the re-use of land that has been previously developed.
- Provide appropriate amounts and types of housing to meet the needs of the borough's **urban** and **rural** communities over the lifetime of the Plan.
- Support a **stronger local economy** delivering economic growth, broadening employment opportunities and attracting and enabling high value businesses to prosper for the benefit of the borough's existing and future residents.
- Create a **distinctive**, **attractive** and **multi-functional** town centre for the future with a particularly strong focus on leisure and visitor economy activities.
- Achieve a borough where everybody has appropriate access to **high quality health and social care** as well as everyday essential services and community facilities. Where **social** and **cultural wellbeing** are supported, enabling all residents to lead healthy and independent lives.
- Deliver **existing and future infrastructure** needs to support growth in both the urban and rural areas of the borough through the implementation of the Community Infrastructure Levy and other means.
- Improve the borough's transport infrastructure in order to support growth in the local economy and to make the borough more attractive as a place to live and do business. Reduce congestion in the borough, particularly into and around the town centre and by **making journeys by public transport, walking and cycling more attractive** to encourage an increase in more sustainable and healthy modes of transport.
- **Develop a strong and multifunctional urban and rural green infrastructure network through protecting, enhancing, extending and linking landscapes, woodland, biodiversity sites, heritage sites, green spaces and paths.**
- Support and create a high quality, inclusive and safe built environment which **values local landscape and settlement character and which conserves and enhances the historic environment and is enjoyed by all.**
- **Protect and enhance our natural resources including air, soil minerals and water to minimise the impacts of flooding, climate change and pollution.**

Bedford Green Infrastructure Plan (2009)

2.1.18 The Bedford Green Infrastructure Plan (2009) outlines a strategy to protect, enhance, and create a multi-functional network of green spaces, access, biodiversity, heritage, and landscapes. It aims to provide social, economic, and environmental benefits for Bedford Borough, complementing broader regional plans.

Key Objectives and Principles:

- To **protect** and where possible **enhance** the rich **landscape**, **biodiversity** and the **historic environment** of Bedford Borough.
- To provide **new green infrastructure assets** for both existing and new communities
- To **improve access** and **links** for **people** and **wildlife** between **existing and proposed green infrastructure** assets.
- To **manage** the green infrastructure network to **high standards** of **environmental quality** and **sustainability**.
- To deliver **integrated social, economic and environmental benefits** that contribute to the quality of life in Bedford Borough.
- To **minimise** and **mitigate** the impacts of **climate change**.

Note: Words in **bold** highlighted by WSP

2.2 Green Infrastructure Assets

LANDSCAPE FORM AND IDENTITY

2.2.1 Landscape Form and Identity defines the visual and cultural character of the area, shaped by natural landforms, historical context, and settlement patterns. It includes elements such as topography, local landscape character, cultural heritage, landscape types, and demographics, all of which influence the identity and sense of place of the site.

Topography

2.2.2 The Site and its immediate surroundings appear relatively flat, with more undulating terrain present further south. The elevation gradually increases towards the south and east.

Setting

2.2.3 The Proposed Development is positioned on the southern edge of the Bedford Borough local authority boundary, marking a transitional zone between the Bedford urban area and the surrounding rural landscape. Its location bridges the urban setting of Bedford/Kempston and the adjacent countryside, providing a mix of connectivity and proximity to agricultural and open land uses.

Local Landscape Character

2.2.4 The site is primarily located within the 5D North Marston Clay Vale and 5E East Marston Clay Vale landscape character areas, characterised by low-lying clay vales with agricultural fields and scattered settlements. Adjacent areas include the 4A Great Ouse Clay Valley and Bedford/Kempston Urban, which reflect the transition from rural to urban settings.

Cultural Heritage

2.2.5 The Site is surrounded by rich cultural heritage, above and below ground, with numerous designated parks and gardens, historic hedgerows, scheduled monuments, conservation areas, and listed building and assets in the wider region. This includes a high density of heritage features concentrated within Bedford's urban core, alongside scattered historic sites and landmarks in the rural surroundings, reflecting a blend of urban and countryside heritage assets.

Landscape Types

2.2.6 The Site is surrounded by a variety of landscape types, including agricultural fields, woodland, and green and blue spaces. There are also designated landscape areas, such as parks and conservation sites, reflecting a mixture of rural and semi-urban settings that enhance the ecological and visual character of the region.

Demographics

2.2.7 The demographics within the Site's vicinity are diverse, with a mix of suburban and rural communities. The area is comprised of the following Experian Mosaic groups*; "Aspiring Homemakers" (21%), "Domestic Success" (13%), and "Prestige Positions" (10%), indicating a blend of young professionals, families, and affluent households. Additionally, there are notable groups of "Rural Reality" (8%) and "Country Living" (5%), reflecting a significant rural presence. The presence of "Rental Hubs" (6%) and "Transient Renters" (4%) suggests a portion of the population consists of short-term residents or those in temporary housing.

** for description of groups see Annex 1: section 1.2 Landscape Form and Identity: Demographics*

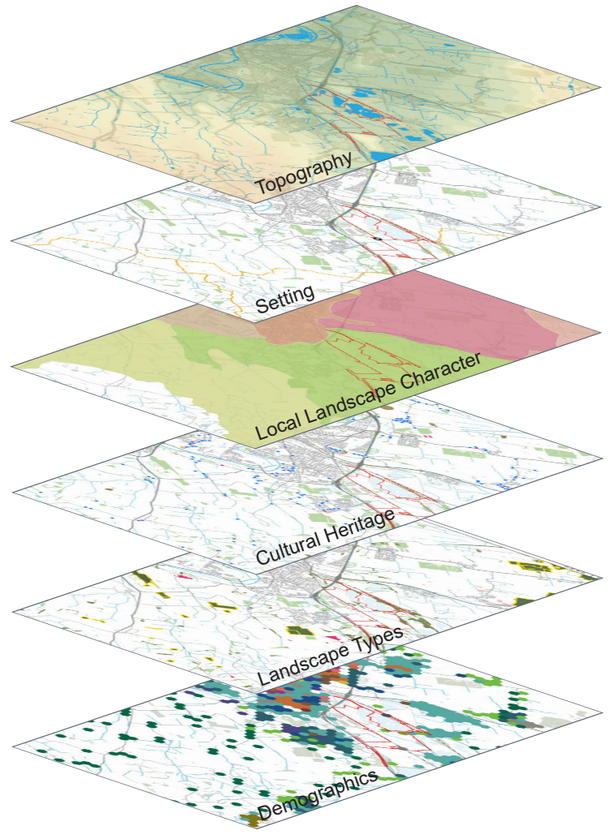


Figure 6: Landscape Form and Identity Mapping

Note: Please refer to Annex 1 for full GI asset mapping.

2.2 Green Infrastructure Assets

ACCESS AND CONNECTIVITY

2.2.8 Access and Connectivity refers to the existing movement of people through and around the site via sustainable transport modes. It includes walking, cycling, and equestrian routes, as well as public transport networks, ensuring accessibility and promoting active travel while reducing reliance on private vehicles.

Walking

2.2.9 The walking routes outside the Site are well-connected through a network of footpaths and bridleways, linking both urban and rural areas. There are several national trails in the wider area, providing opportunities for long-distance walking, while local footpaths offer accessibility within and around the red line boundary, ensuring connectivity to nearby towns and countryside.

Cycling

2.2.10 The Site is located near a network of cycle paths and bridleways, offering good potential to contribute to wider connectivity throughout the area. In addition to local routes, several long-distance national trails pass through the region, complemented by a Sustrans National Route that provides a direct link from Bedford town centre to the surrounding rural areas.

Equestrian

2.2.11 The Site is in close proximity to a well-connected network of equestrian routes, primarily consisting of bridleways and national trails. These routes provide safe and accessible riding paths, linking both local and long-distance trails while excluding designated footpaths, however they do not have have a direct link to the Site.

Sustainable Transport

2.2.12 The sustainable transport network within the Site boundary includes two rail lines passing through the area. Kempston Hardwick Railway Station sits close to the Site boundary. Local bus services are concentrated in Bedford town centre, providing strong connectivity across the region. While bus stops are well distributed throughout the wider area, their presence is limited in the immediate surroundings of the Site.

Index of Multiple Deprivation

2.2.13 The Index of Multiple Deprivation (IMD) mapping indicates that the Site falls within an area of moderate deprivation, with higher levels of deprivation towards Bedford town centre and lower levels in the surrounding rural areas. The Site is positioned between more affluent areas to the south and west and more deprived urban areas to the north, highlighting a socio-economic gradient that may influence local infrastructure needs and community priorities.

Accessibility: Natural England Neighbourhood Standard

2.2.14 The accessibility mapping illustrates the distribution of green spaces within and around the Site, assessing how well local communities can reach natural areas for recreation and well-being. The analysis shows that the Site benefits from proximity to multiple accessible green spaces, including those within a 1 km radius (approximately a 15-minute walk) and larger spaces within 2 km. This ensures that residents in neighbouring communities and visitors have access to a variety of natural environments, supporting outdoor activities and biodiversity connectivity.

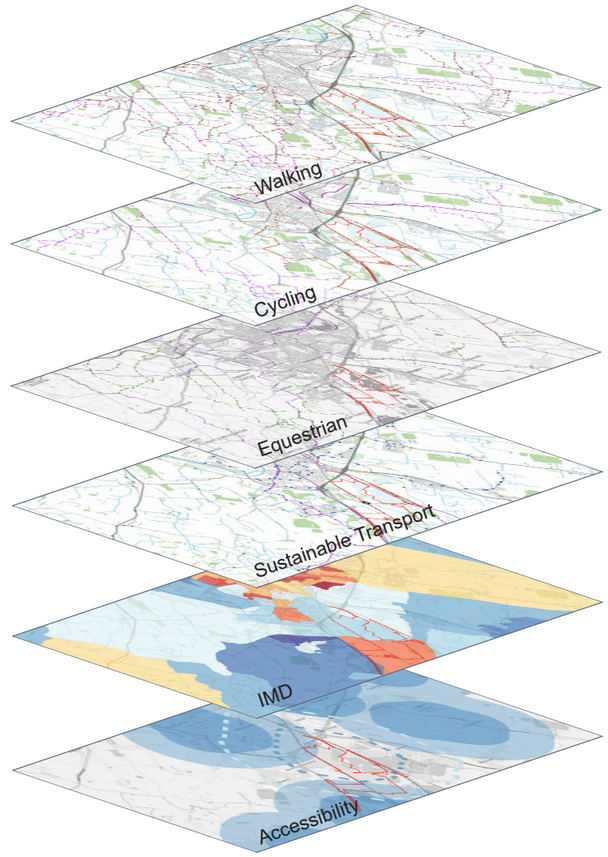


Figure 7: Access and Connectivity Mapping

Note: Please refer to Annex 1 for full GI asset mapping.

2.2 Green Infrastructure Assets

NATURE-BASED SYSTEMS

2.2.15 These assets focus on the integration of natural features and processes to enhance environmental resilience and biodiversity. This includes green infrastructure such as parks and woodlands, tree cover distribution, blue infrastructure (water bodies and drainage), and surface water management strategies that support ecological health and climate adaptation.

Green Infrastructure

2.2.16 The Site is located within the Forest of Marston Vale area, a landscape initiative aimed at environmental regeneration. While there are several ancient woodlands in the wider area, none are in close proximity to the Site. Additionally, a couple of County Wildlife Sites (which are reclamation sites of former mining pits associated with the former brickworks) are located adjacent to the Site, contributing to the area's ecological value.

Tree Cover

2.2.17 Mapping indicates the Site has a moderate amount of tree cover, primarily concentrated along water bodies, field boundaries, and certain pockets within the Site. The surrounding landscape is largely open countryside with scattered woodland areas, while the site itself includes several green corridors and patches of dense vegetation.

Blue Infrastructure

2.2.18 The blue infrastructure within the Site includes a network of water bodies, streams, and floodplains, with notable connections to the River Great Ouse. The Site is influenced by surrounding watercourses and adjacent lakes, contributing to local drainage, flood management, and ecological connectivity.

Surface Water Regime

2.2.19 Mapping indicates the surface drainage for the Proposed Development outlines key hydrological networks, with blue lines representing existing watercourses and drainage channels. The Site encompasses a landscape with integrated water management features, ensuring controlled water flow, flood mitigation, and connectivity to surrounding drainage systems. This strategic approach enhances resilience against surface water runoff while supporting ecological and recreational functions.

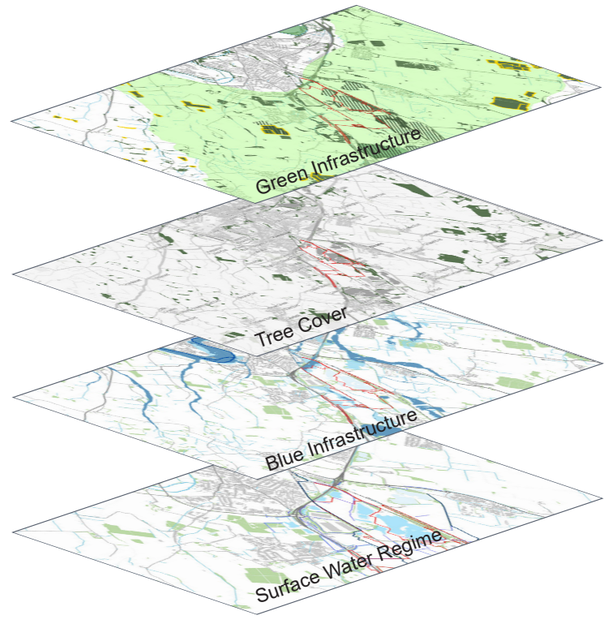


Figure 8: Nature-Based Systems Mapping

Note: Please refer to Annex 1 for full GI asset mapping.

2.3 Visual Analysis

2.3.1 This section provides a summary of the full visual assessment of the Site, utilising 10 viewpoint locations selected from the Landscape and Visual Impact Assessment (Environmental Statement - Chapter 7: LVIA). Viewpoints 1–8 capture perspectives from surrounding areas, while 9–10 were obtained from a drone flyover (15-04-2024), offering additional insight into the site's visual characteristics.

2.3.2 The analysis evaluates these viewpoints by examining perceptual and aesthetic qualities, assessing how key visual elements, spatial relationships, and scenic values contribute to the landscape experience.

2.3.3 Applying the Landscape Character Assessment Wheel (An Approach to Landscape Character Assessment – Natural England), this analysis provides a structured exploration of how the site's visual composition interacts with its surroundings, shaping its overall landscape character.

Note: Please refer to Annex 1 for the detailed visual analysis.

Figure 9: Visual Composite of the Site

3. Green Infrastructure Strategy

3.1 Spatial Key Moves

3.1.1 The GI Strategy defines key actions to be incorporated into the Proposed Development, ensuring that strategic spatial moves align with the Design Principles. By addressing opportunities and constraints within the area, the strategy provides a framework for sustainable development.

3.1.2 The identified spatial moves are:

- Improve Green Connections and Biodiversity
- Establish an Active Travel Network
- Celebrate Unique Landscape Features
- Integrate Water Management Systems.

3.1.3 By identifying key interventions, the strategy highlights how the Proposed Development can contribute to overcoming environmental and social challenges while enhancing sustainability, resilience, and connectivity. These actions will guide the development of a multifunctional and adaptable landscape, fostering biodiversity, improving access to nature and opportunities for being active, in a more inclusive environment. Through thoughtful planning and design, the GI Strategy shapes a greener, healthier, and more connected future for nature and the wider community.

Improve Green Connections and Biodiversity

Habitat Connectors

Green Connectors

Green Crossings

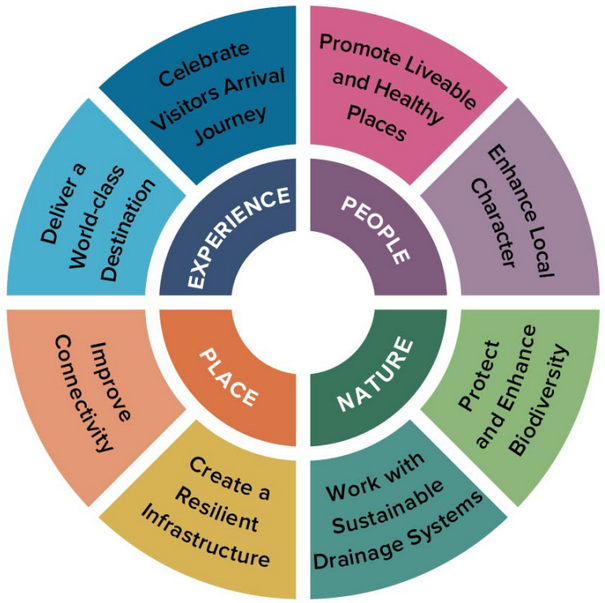
Ecological Enhancement Area

Establish an Active Travel Network

Walking

Cycling

Sustainable Transport



Celebrate Unique Landscape Features

Gateways

Views

Integrate Water Management Systems

Core Zone Watercourse

Lake Zone Clay Pits

Surface Water Network

Figure 10: Spatial Key Moves

3.2 Improve Green Connections and Biodiversity

3.2.1 The key components to improve green connections and biodiversity across the Site are:

Ecological Connectors

3.2.2 Ecological Connectors are linear features which create links between existing habitats such as watercourses or woodland, and seek to mitigate and join up habitats which otherwise would be fragmented by existing or new barriers such as railways and roads. Their primary function is to connect habitats and facilitate the dispersal and movement of wildlife across the landscape. These connectors also play a crucial role in seeking to retain and enhance ecological networks at a landscape scale. Creating and linking Ecological Connectors within the Site and enhancing others where existing will strengthen the local/regional ecological network. These enhanced sections will promote habitat connectivity through the restoration and improvement of vegetation, such as hedgerows, native grasslands, wildflower meadows, and riparian corridor planting and sensitive management such as reduced lighting and control of invasive species.

Green Connectors

3.2.3 Green Connectors are proposed links through the Site along existing and proposed infrastructure for example roads and recreational routes. These multi-layered connectors primarily offer integrated and multifunctional linkages including amenity and sustainable travel use, as well as seek to provide networks for landscape and biodiversity. Furthermore, Green Connectors can generally also incorporate additional features and functions, such as integrating sustainable urban drainage. They offer an improved experience of nature for users, benefiting both the environment and the community.

Ecological Enhancement Areas

3.2.4 Ecological Enhancement Areas (EEAs) are areas within the Proposed Development where habitats will be created, restored and improved to mitigate the impacts of the Proposed Development. Habitats will be created in accordance with the principals of Appendix 6.4 Outline Habitat Creation and Enhancement Plan. These areas aim to provide an array of habitats capable of accommodating and attracting a range of wildlife, thereby supporting future biodiversity goals. This has included embedding ecological design into the development of drainage proposals for the Proposed Development.

Green Crossings

3.2.5 Green Crossings are essential components of a well-functioning green network. They will provide safe passage for wildlife, allowing species to move between habitats which otherwise may become fragmented, support the movement of pollinators, and help mitigate where barriers such as roads or railways are proposed within the surrounding landscape. Green Crossings can take various forms, such as wildlife underpasses, and culverts for animals passage. There are numerous resources available to guide their design and implementation, including the Natural England Green Bridges Guide.

Bat Hop-over

3.2.6 A bat 'hop-over' typically consists of a feature comprising of existing or planted vegetation e.g tall trees or scrub located on either side of a infrastructure barrier e.g. a road/railway, which seeks to reduce gaps in flight line canopies and encourages bats to maintain or increase their flight height. The aim is to provide these habitat features within the Site to guide bats across roads/ railways at a safe height to avoid collision risk. The vegetation can be combined with earth ramps or screens or via the use of artificial structures or screens. Hop-overs have variable documented success dependant on the flight height and type of the bat species being mitigated.

Note: The key components listed are shown Figure 12: Improve Green Connections and Biodiversity - Diagram.

Figure 11: Improve Green Connections and Biodiversity - Precedent Images

3.2 Improve Green Connections and Biodiversity

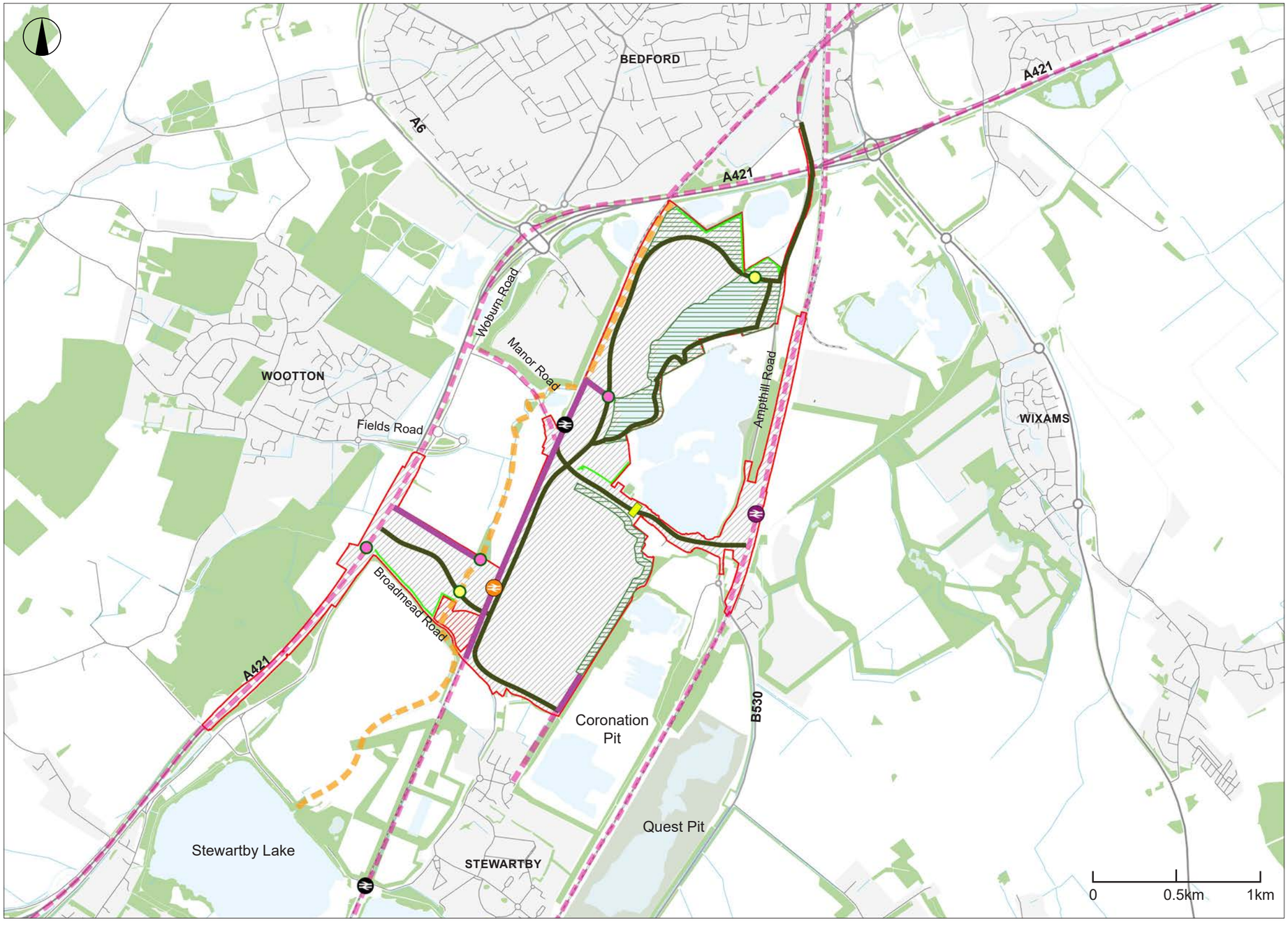


Figure 12: Improve Green Connections and Biodiversity - Diagram

3.3 Establish an Active Travel Network

3.3.1 The key components to establish an active travel network across the Site are:

Walking Route

3.3.2 Walking Routes are designated paths or trails intended for pedestrians to walk safely from one location to another. They are located along roadsides or on pedestrian-only pathways, and may be marked with signs, pavement markings, or other indicators to guide walkers.

Lake Path

3.3.3 Whilst not part of the active travel plan, UDX is proposing a recreational Lake Path around the enhanced water body in the Lake Zone, which will be a pedestrian only route owned and maintained by UDX around the reprofiled main lake offering opportunities to create places to stop and engage with nature. Refer to Figure 15.

Crossing

3.3.4 Crossings are structures such as footbridges or underpasses that provide safe passage for pedestrians and cyclists across the railways, roads, or Elstow brook. These crossings ensure that pedestrians and cyclists can move securely in and out and across the site without interacting with vehicular or other potentially hazardous traffic.

3.3.5 Crossings across the site improve connectivity, promote active travel, and enhance overall accessibility in areas where direct crossings might otherwise be difficult or dangerous.

Cycle Route on Carriageway

3.3.6 A Cycle Route on the Carriageway requires cyclists to share the road with other vehicles. Proposed or improved cycle routes across the site will be designed in accordance with highway standards and will be clearly marked with signage or road markings to enhance cyclist safety and visibility while interacting with cars, buses, and other vehicles. The adopted authority will ensure clear guidelines are in place so that both cyclists and pedestrians understand their responsibilities.

Segregated Cycle Routes

3.3.7 A Cycle Route Separate to Carriageway is a cycling lane that is physically separated from the main road or carriageway used by vehicles, and from pedestrian footway. This route will be built along a parallel route, such as a dedicated cycle lane, path, or trail, providing cyclists with a safer and more protected space away from traffic. All cycling routes to be designed in accordance with LTN 1/20.

Cycle Route shared with Pedestrians

3.3.8 A Cycle Route shared with Pedestrians is a designated pathway where both cyclists and

Figure 13: Establish an Active Travel Network - Precedent Images (a)

3.3 Establish an Active Travel Network

pedestrians use the same space. These routes will features signage or markings to indicate that both groups are allowed to travel along the same path.

Transport Hub

3.3.9 Transport Hubs are integrated with public transport and access to the Theme Park providing an integral resource at key nodal points of travel. These hubs may include train, bus and cycling infrastructure.

Cycle Hub

3.3.10 Cycle hubs will be intergrated into the active travel network across the Site, encouraging active travel. In addition, cycle stands will be positioned at key access points such as to the Lake Path.

UDX Hub

3.3.11 UDX Hubs are infrastructure to be delivered within the Theme Park to promote active travel among the UDX team members. These hubs will feature both bus and cycling infrastructure, and accomodate Team Member shuttles linking to dedicated walking routes.

Transit Route

3.3.12 The proposed Transit Route is a shuttle bus service from the Wixams train station and the main entrance to the Theme Park.

UDX Transit Route

3.3.13 The UDX Transit Route is a bus service for UDX staff linking the Wixams trains station to the Theme Park's team members area.

Noite: The key components listed are highlighted in Figures 16, 17 and 18.

Figure 14: Establish an Active Travel Network - Precedent Images (b)

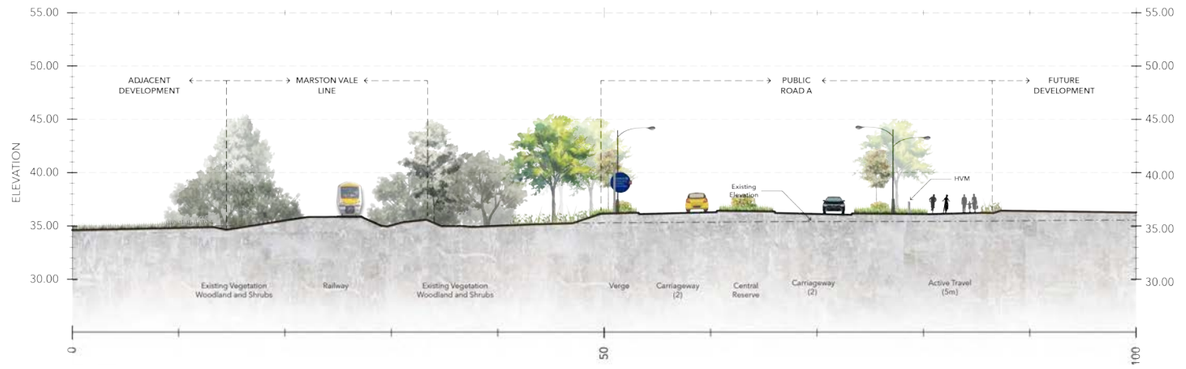
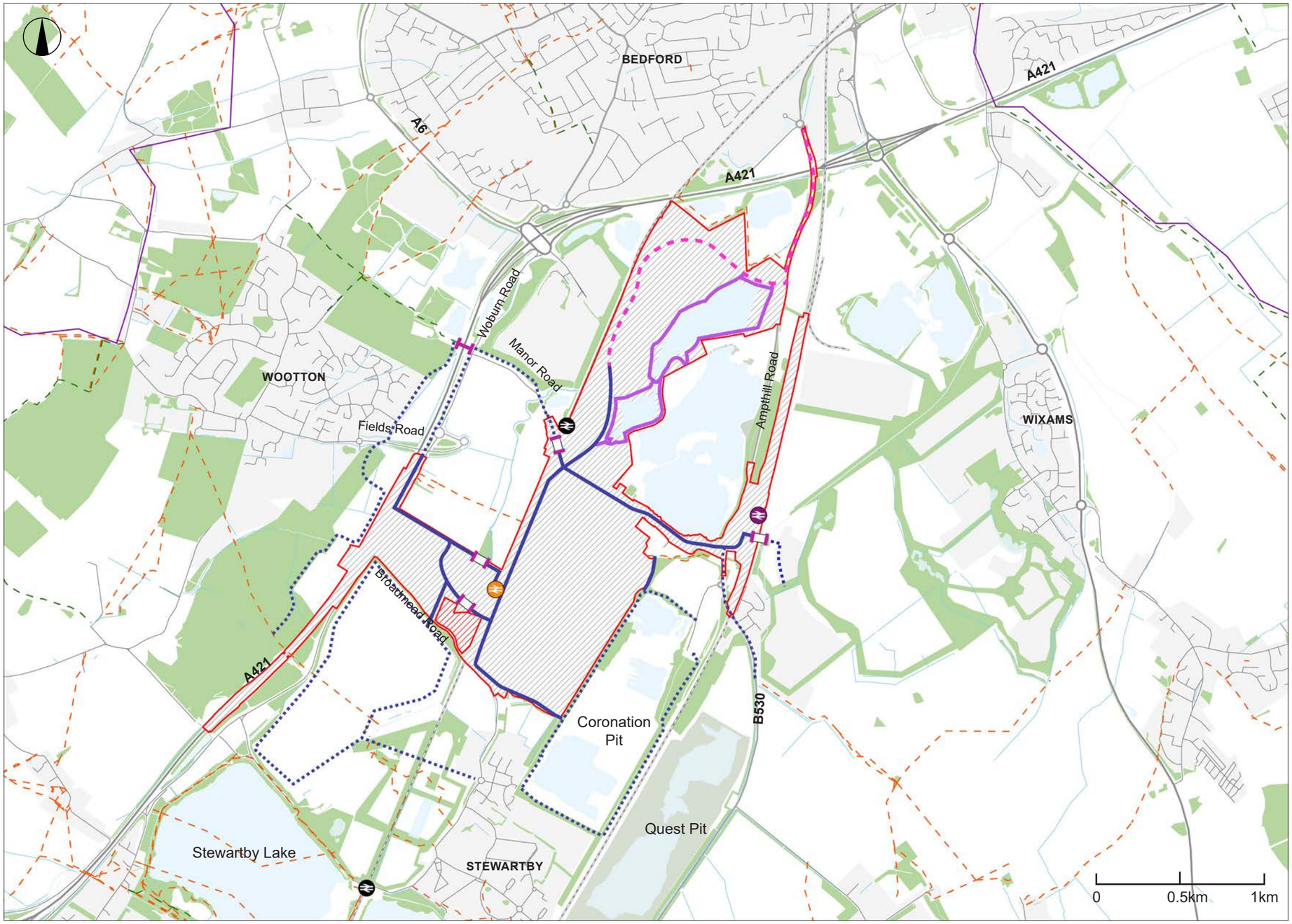


Figure 15: Establish an Active Travel Network - Active Travel Section through The Boulevard

3.3 Establish an Active Travel Network



WALKING

KEY

- Site Boundary
- Omitted Area from Site Boundary
- Proposed Wixams Railway Station
- Safeguarded Site for Potential New EWR Railway Station

Proposed

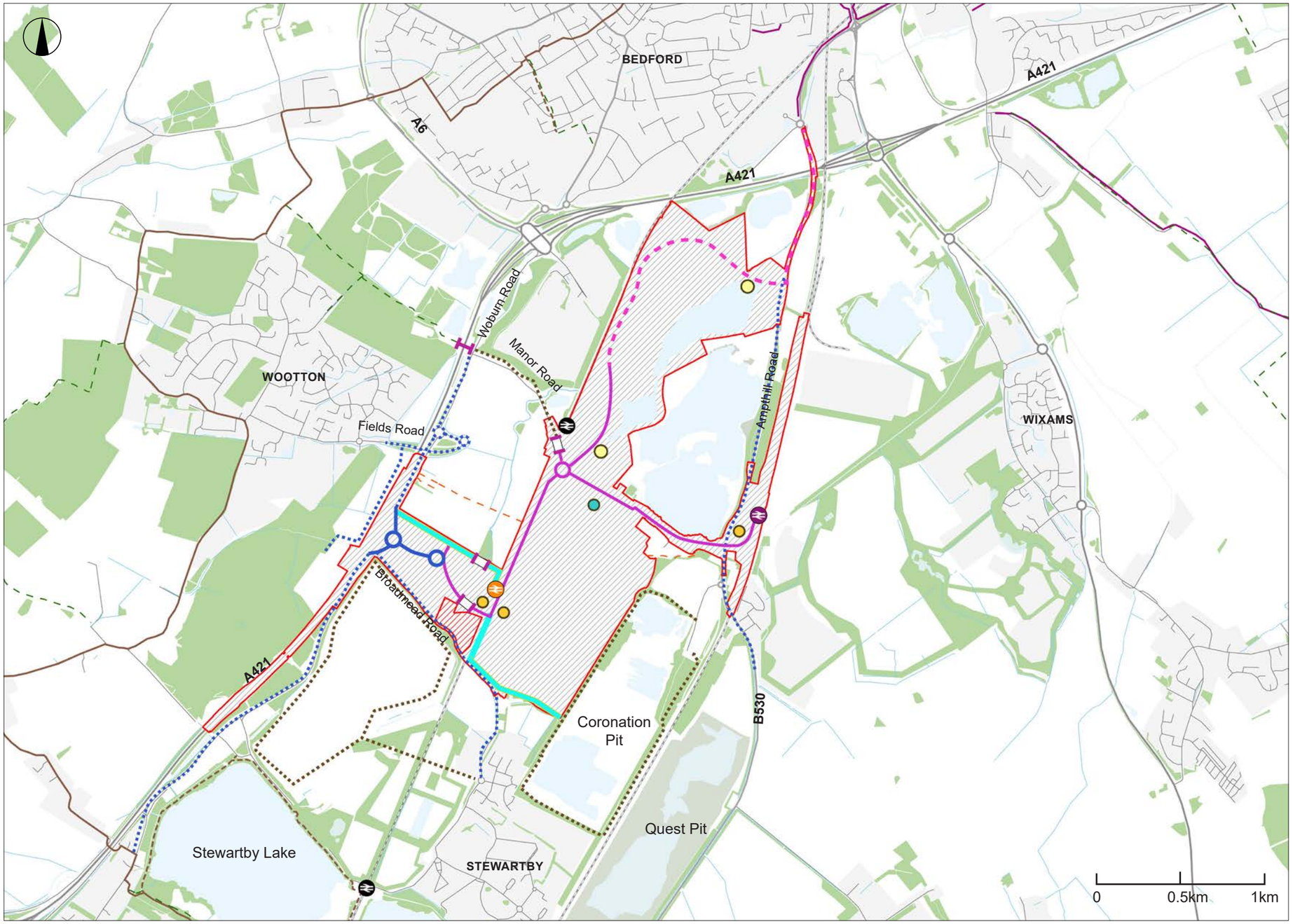
- Walking Route
- Lake Path (owned by UDX)
- Indicative Walking Route
- Crossing
- Development Area

Existing

- Walking Route
- Footbridge
- Bridleway
- Footpath
- National Trail Route
- Urban Areas
- Tree Cover
- Waterbody
- Railway Station

Figure 16: Establish an Active Travel Network - Walking Diagram

3.3 Establish an Active Travel Network



CYCLING

KEY

- Site Boundary
- Omitted Area from Site Boundary
- Proposed Wixams Railway Station
- Safeguarded Site for Potential New EWR Railway Station

Proposed

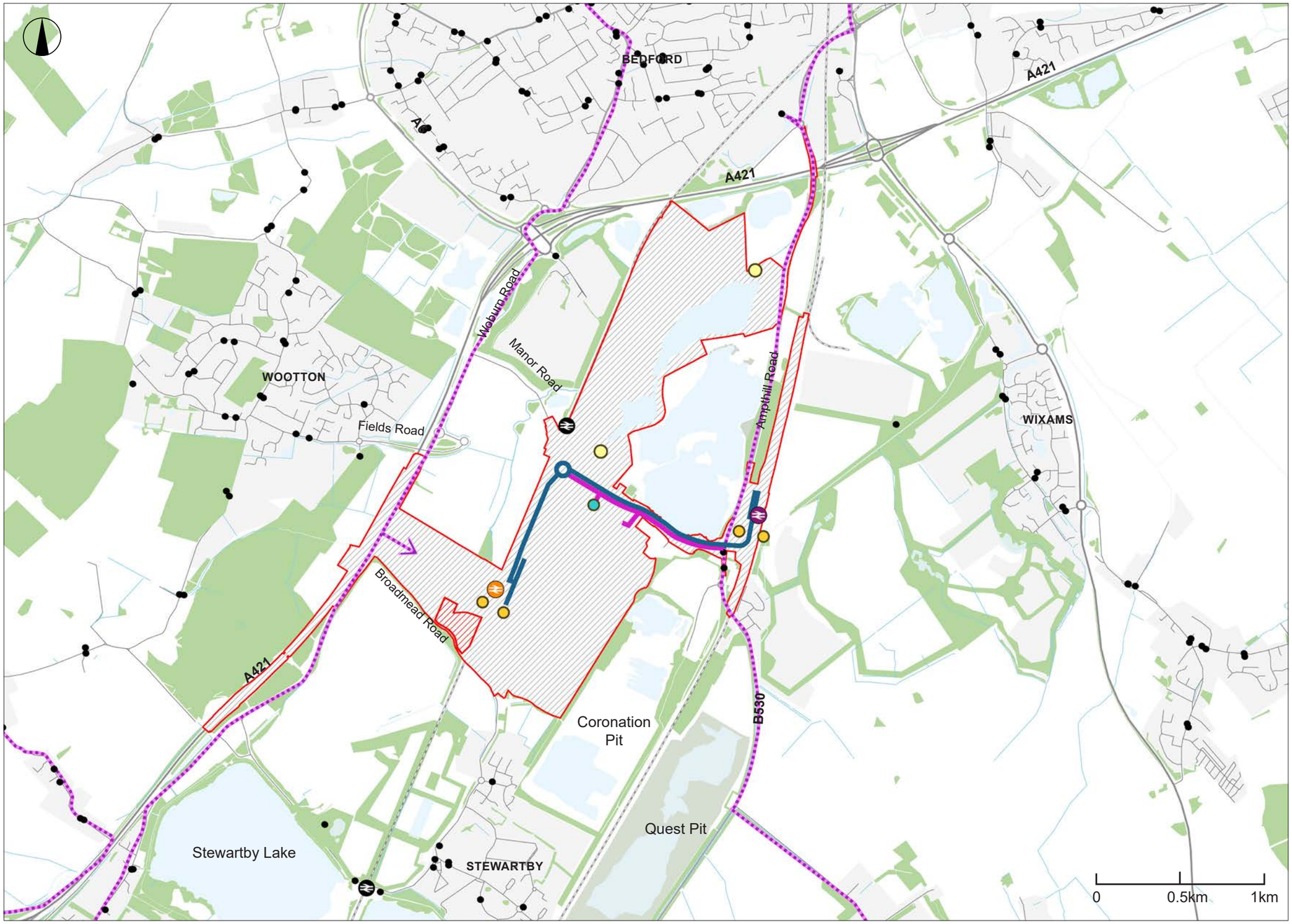
- Cycle Route on Carriageway
- Segregated Cycle Route off Carriageway
- Indicative Cycle Route off Carriageway
- Cycle Route shared with Pedestrians
- Transport Hub
- UDX Hub (infrastructure to be delivered within development)
- Cycle Hub
- Crossing
- Development Area

Existing

- Footbridge
- Cycle Route on Carriageway
- Cycle Route shared with Pedestrians
- Local Cycle Trails
- National Cycle Network (Traffic Free)
- National Cycle Network
- Bridleway
- Urban Areas
- Tree Cover
- Waterbody
- Railway Station

Figure 17: Establish an Active Travel Network - Cycling Diagram

3.3 Establish an Active Travel Network



SUSTAINABLE TRANSPORT

KEY

- Site Boundary
- Omitted Area from Site Boundary
- Proposed Wixams Railway Station
- Safeguarded Site for Potential New EWR Railway Station

Proposed

- Transit Route (Shuttle Bus)
- UDX Transit Route
- Transport Hub
- UDX Hub (infrastructure to be delivered within development)
- Cycle Hub
- Development Area

Existing

- Bus Stop
- Public Bus Routes
- Urban Areas
- Tree Cover
- Waterbody
- Railway Station

Figure 18: Establish an Active Travel Network - Sustainable Travel Diagram

3.4 Celebrate Unique Landscape Features

3.4.1 The key components to celebrate unique landscape features across the site are:

Primary Gateway

3.4.2 Primary Gateways at key locations across the Site serve as prominent entrance points, drawing attention and encouraging interaction with the Proposed Development. These gateways are strategically located at major access points, acting as welcoming features that signal the entrance to the development. They may include architectural elements, signage, landscape, or other distinctive designs that create a sense of arrival and orientation – further details to be provided in the wayfinding strategy.

Secondary Gateway

3.4.3 Secondary Gateways are strategically located across the site supporting wayfinding, improving navigation and ensuring seamless transition between different sections of the site. They may be marked by distinctive design elements, such as signage, landscape, or lighting, that provide clear direction and create recognisable landmarks – further details to be provided in the wayfinding strategy.

Viewpoint

3.4.4 Key Viewpoints across the Lake Path will be strategically positioned to provide visitors, and passersby with opportunities to enjoy the surrounding natural environment and scenic vistas. These viewpoints are spaces where people can pause, relax, and take in views of the landscape, whether it's a lush green space, nearby the lakes, or distant hills formed by the Greensand Ridge.

3.4.5 Viewpoints may be enhanced with seating, landscape, or interpretive signage, encouraging outdoor engagement and foster a deeper connection with the surrounding area. They will also serve as spots for reflection or social interaction, contributing to the overall experience of the development.

Note: The key components listed are shown Figure 20: Celebrate Unique Landscape Features - Diagram.

Figure 19: Celebrate Unique Landscape Features - Precedent Images

3.5 Celebrate Unique Landscape Features

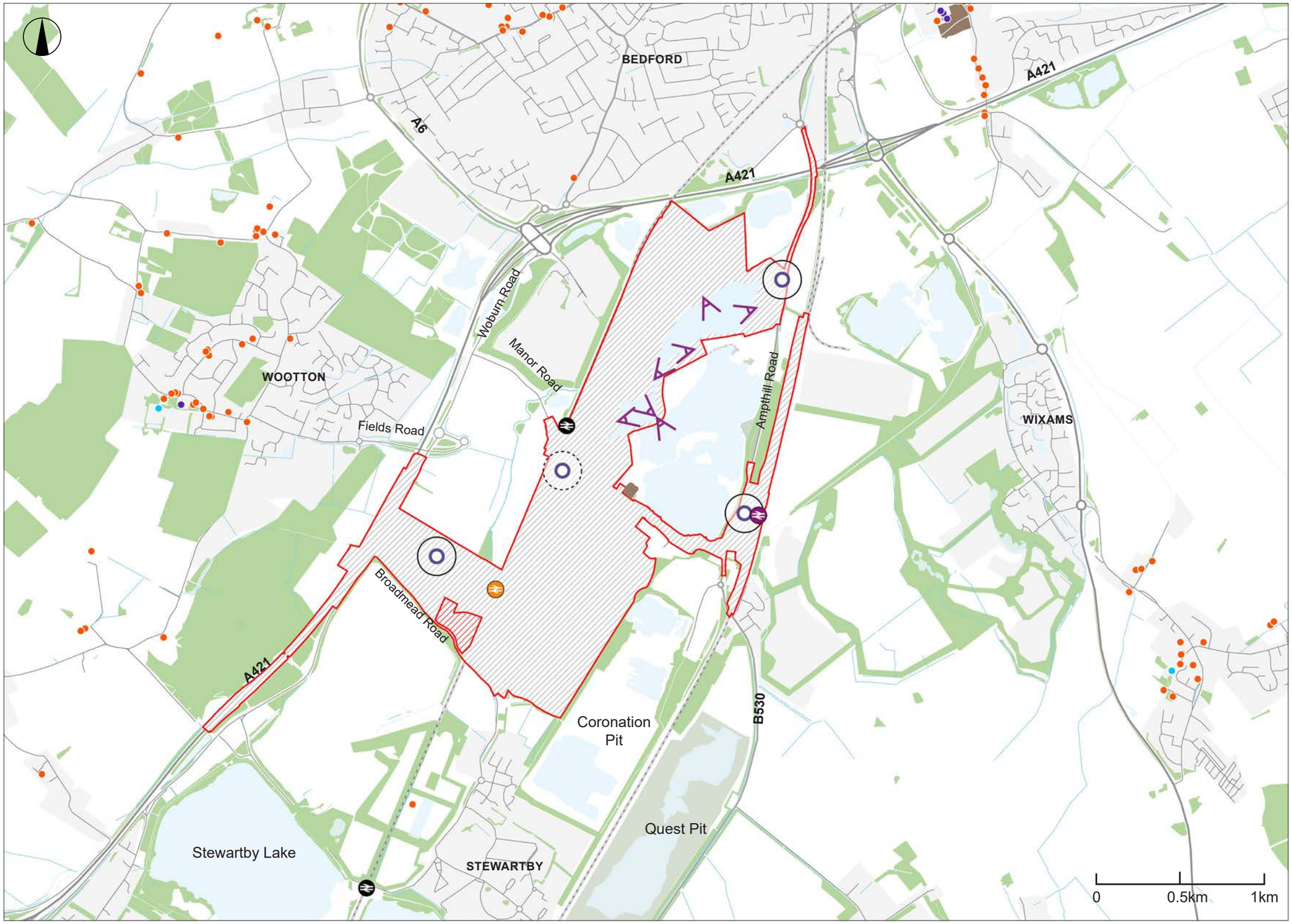


Figure 20: Celebrate Unique Landscape Features - Diagram

3.5 Integrate Water Management Systems

3.5.1 The key components to integrate water management systems across the Site are:

Core Zone Watercourse

3.5.2 The Core Zone existing watercourse will be relocated and includes 10m riparian protection zone set back from the top of bank, which provides benefits for habitat and habitat connectivity, strengthening riverbanks, diffusing pollution mitigation, reducing risk of flooding, and amenity/recreation. Proposed permanent features e.g. roads, car parking, hard pavements, buildings, barriers, walls and fences, will not be within the riparian zone.

3.5.3 Core Zone drains to the relocated watercourse, which discharges into the Kempston Hardwick Clay Pits (North) - Artificial Lake, in the Lake Zone, via a proposed culvert connection beneath Manor Road, replacing the existing culverts. The watercourse and culvert will be sized to receive site flows, existing off-site flows and the future overflow from the Coronation Pit. The Kempston Hardwick Clay Pits (North) - Artificial Lake discharges to the proposed Lake Zone Clay Pits strategic attenuation.

Lake Zone Clay Pits

3.5.4 The Lake Zone strategic attenuation will be a Wetland Feature with a permanent level of water, attenuation volume for the Core and Lake Zones and adequate storage for rainwater harvesting requirements and emergency storage in the event of pump failure. The disused pits will be carefully reprofiled, existing rubble/bricks/sediment will be removed as required and reused where possible. Surface Water run-off will be conveyed through multiple levels of treatment and stored in the pits. The proposed bank treatment includes varied side slopes, flat landings, and enhanced landscaping, which provides a supporting environment, encouraging biodiversity and self-sustaining resilient ecosystems. The lake discharge will be pumped to the valve complex and either discharge to the water processing and collection plant for the Proposed Development non-potable water supply, or discharge to Kempston Hardwick Clay Pits (North) - artificial lake, or Elstow Brook at greenfield run-off rates.

Surface Water Network

3.5.5 Surface water will be conveyed via a gravity system in all cases aside from the discharge from the strategic attenuation in the Lake Zone. The collection mechanism for surface water may include but not be limited to; swales, below ground pipe networks, green roofs, rain gardens and permeable paving.

Surface Water Reuse and Recycling

3.5.6 Surface water captured where practicable will be re-used as the non-potable water supply for the Core Zone. An allowance for rainwater harvesting volumes has been made when determining the total surface water storage volumes for the Core and Lake Zones.

Surface Water Quality Control

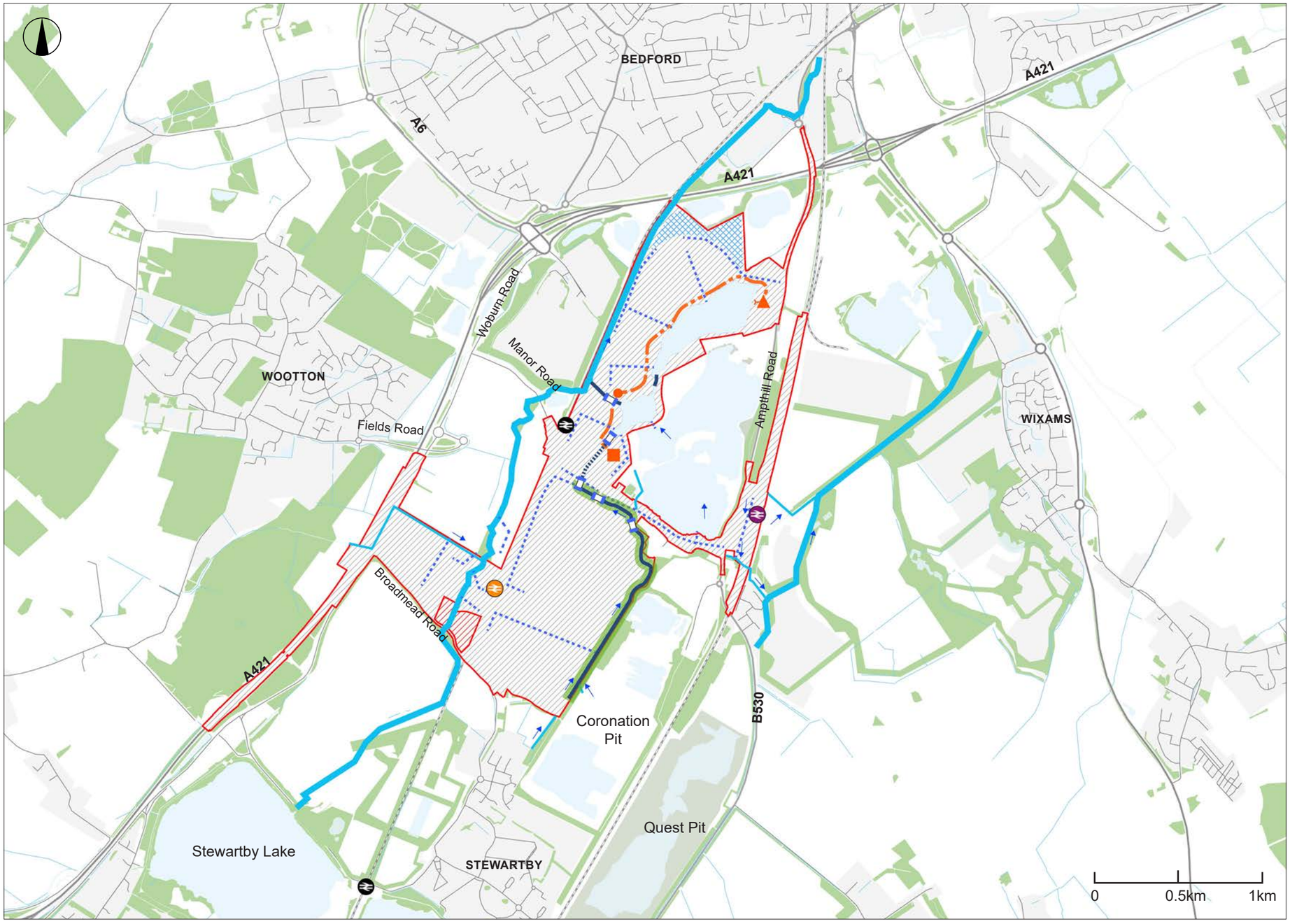
3.5.7 As per CIRIA SuDS Manual C753 Simple Index Approach (SIA), surface water runoff from developed sites conveys contaminants such as Total Suspended Solids (TSS), Heavy Metals and Hydrocarbons, which could negatively impact receiving waterbodies and downstream networks. Strategic SUDS including detention basins, wetlands, ponds, and watercourses are selected to mitigate the risk of onsite pollution through sediment control, interception and treatment through sunlight exposure, trapping, absorption, evapotranspiration, localised infiltration into the topsoil and vegetation.

Note: The key components listed are shown Figure 22: Intergrate Water Management Systems - Surface Water Drainage Diagram.

Note: Refer to document Environmental Statement Volume 3 Appendix 12.3 | Outline Drainage Strategy

Figure 21: Integrate Water Management Systems - Precedent Images

3.5 Integrate Water Management Systems



KEY

- Site Boundary
- Omitted Area from Site Boundary
- Proposed Wixams Railway Station
- Safeguarded Site for Potential New EWR Railway Station

Proposed

Proposed Surface Water Sewer System - subject to final drainage strategy plan

Core Zone Watercourse

- Watercourse
- Watercourse Corridor
- Culvert
- Headwalls

Lake Zone Clay Pits

- Underground Water Surface Rising Main
- Surface Water Pumping Station
- Water Processing and Collection Plant
- Surface Water Valve Compound

Surface Water Network

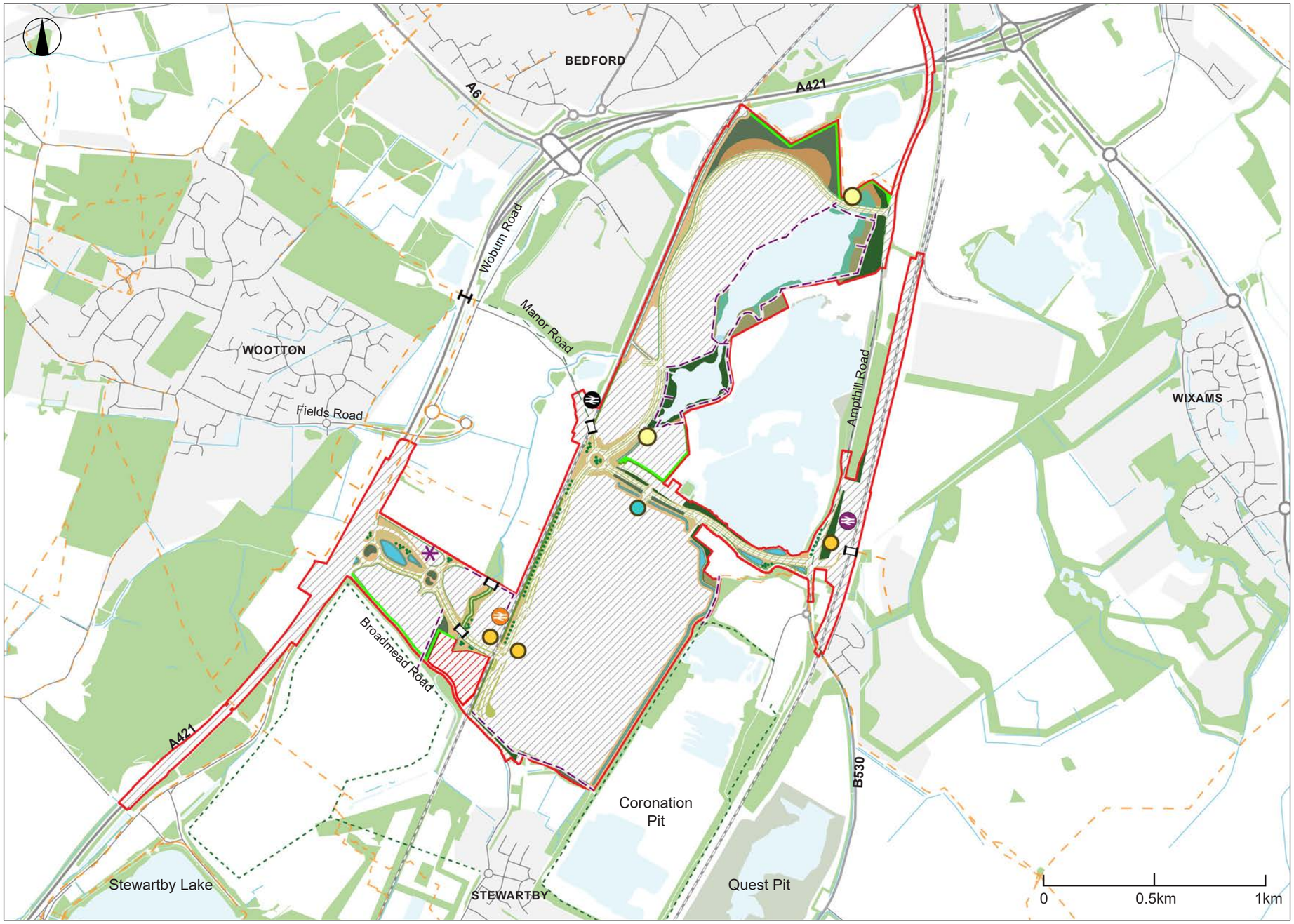
- Surface Water Sewer System
- Direction of Surface Water Flow
- Area for Surface Flood Volume
- Development Area

Existing

- Minor River
- Watercourse
- Waterbody
- Urban Areas
- Tree Cover
- Waterbody
- Railway Station

Figure 22: Integrate Water Management Systems - Surface Water Drainage Diagram

3.6 Indicative GI Proposal



KEY

- Site Boundary
- Omitted Area from Site Boundary
- Development Area
- Urban Areas
- Tree Cover
- Future Train Station
- Potential Train Station
- Future Active Travel

Proposed

- Active Travel
- Transport Hub
- UDX Hub (infrastructure to be delivered within development)
- Cycle Hub
- Crossings
- Amenity Grass
- Waterbody
- Woodland Planting
- Species Rich Grassland
- Meadow Grassland
- Wet Grassland
- Scrub Planting
- Hedgerow
- Semi-mature Trees
- Existing watercourse enhancement under development

Retained and Enhanced Habitats

- Hedgerow
- Woodland
- Scrub Planting
- Reedbeds

Existing

- Train Station
- Active Travel
- Footbridge
- Waterbody

Figure 23: Indicative GI Proposal - Diagram

4. Green Infrastructure Evaluation

4.1 GI Evaluation Methodology

4.1.1 Natural England's Green Infrastructure Framework provides a structured methodology for assessing and enhancing green infrastructure to support biodiversity, climate resilience, and community well-being.

4.1.2 The Green Infrastructure Standards are a key component of the Green Infrastructure Framework. They define what good green infrastructure 'looks like'.The five Headline Green Infrastructure Standards are:

- S1: Green Infrastructure Strategy Standard
- S2: Accessible Green Space Standard
- S3: Urban Nature Recovery Standard
- S4: Urban Greening Factor Standard
- S5: Urban Tree Canopy Cover Standard

4.1.3 Standards S2 to S5 have been utilised to assess the GI proposal for the Proposed Development.

Standard 2 - Accessible Green Space

4.1.4 To meet the Accessible Green Space Standard for major developments, three criteria must be considered: size and proximity, capacity, and quality. However, only the last criterion applies to the Proposed Development as the first two relate to major residential developments, requiring that accessible green space aligns with the Green Flag Award Criteria and best practices in accessibility for all. This follows the By All Reasonable Means (BARM) principle, which promotes the least restrictive access to outdoor spaces in major new developments.

4.1.5 BARM outlines key indicators under the following categories:

- Decision to Visit
- Journey and arrival
- On-site experience
- Return home

4.1.6 The GI evaluation assesses which BARM indicators are relevant to the Proposed Development and why.

Standard 3 - Urban Nature Recovery

4.1.7 To meet the Urban Nature Recovery Standard for major developments, the developer should outline the Proposed Development's contribution to nature recovery and the creation and restoration of wildlife rich habitats, which can contribute to the delivery of local nature recovery objectives, including the potential for creation or enhancement of Local Nature Reserves or Local Wildlife Sites.

4.1.8 The GI evaluation demonstrates the Proposed Development's contribution to nature recovery, through the creation and restoration of wildlife rich habitats.

Standard 4 - Urban Greening Factor - UGF

4.1.9 For major developments, the Urban Greening Factor (UGF) Standard recommends a minimum target score of 0.3 for commercial developments. The GI evaluation applies the urban greening calculator from the Green Infrastructure Framework.

4.1.10 Within the theme park area, there is no final design at the time of writing, so the UGF score remains subject to the final design, with a provisional assumption of a factor of 0 for development areas.

Standard 5 - Urban Tree Canopy Cover

4.1.11 The Urban Tree Canopy Cover Standard for major commercial developments aims to enhance tree canopy cover by a specified percentage based on a locally defined baseline. While the Proposed Development does not fully comply with local policy, the Green Infrastructure (GI) evaluation provides an aspiration for increase of tree canopy cover across both the Proposed Development areas and those subject to final design.

4.2 Accessible Green Space

4.2.1 The Natural England Accessible Green Space (AGS) metric assesses the availability and accessibility of green spaces across England, ensuring that people have access within a 15-minute walk from their homes. It informs policies on public health, biodiversity, and climate resilience. The metric applies the “By All Reasonable Means: Least Restrictive Access to the Outdoors” criteria to promote inclusivity for people with disabilities, considering physical, sensory, and cognitive accessibility. While AGS is intended for publicly accessed open spaces, it does not directly apply to the site due to the nature of the GI Strategy, which is primarily linear and focused on route connectivity. However, relevant indicators have been identified to evaluate how the Proposed Development meets these criteria.

4.2.2 Table 1 outlines the applicable indicators, while the complete set of criteria is provided in the Annex 1.

4.2.3 Due to the nature of publicly accessible green space evaluated within the GI Strategy which is largely linear and focused on connectivity of routes that interface with the Site, many of the AGS criteria are not relevant.

Table 1: Accesible Green Space Applicable Indicators

ACCESS CHAIN - VISITOR EXPERIENCE	INDICATORS OF GOOD PRACTICE		HOW DOES PROPOSED DEVELOPMENT MEET THE CRITERIA?
1. DECISION TO VISIT	There is information about site accessibility	Off-site information provides information on the accessibility of site facilities, accessible routes on site, accessible parking, forthcoming events, opening times of facilities and travel options.	The Lakes area is a privately owned green space, and this information is not available separately. However, visitors will find relevant details on Universal’s Theme Park website.
2. JOURNEY AND ARRIVAL	It is possible to reach the route or site by public transport	Transport options are available on site (as well as in off-site information).	The Lakes area is a privately owned green space with no dedicated transport options. However, the broader site offers various transport options, including train stations and bus stops.
	Walking and cycling are supported	There are good routes for walking or cycling to site	The wider site features walking and cycling paths that connect to the broader network and the Lakes area. Walking routes are available within the Lakes area, while cycling is discouraged due to the planned habitat mitigation planting
		Accessible cycling opportunities are available.	Cycling routes are provided outisde the Lakes area with cycling stands provided by entrances.
	Entrances are welcoming and clearly signed	Arrival points have good visitor information, such as an accessible map and wayfinding details.	Landscape and means of access details to be provided in the compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
		Entrances are shared by different visitors (ie not separate for wheelchair users).	Landscape and means of access details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
	Choice of visitor experiences are clearly highlighted	Visitor information is available to show people what experiences are on offer so they can choose what best suits them.	Landscape and means of access details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.

4.2 Accessible Green Space

ACCESS CHAIN - VISITOR EXPERIENCE	INDICATORS OF GOOD PRACTICE		HOW DOES PROPOSED DEVELOPMENT MEET THE CRITERIA?
3. ON-SITE EXPERIENCE: FACILITIES	Good provision of seating and shelter	There are frequent opportunities for visitors to rest along routes.	Landscape and means of access details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
		Seating is prioritised alongside more challenging gradients and surfaces.	Landscape details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
		Shelter is available, particularly in places where visitors are likely to linger (eg pickup points).	Landscape and means of access details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
3. ON-SITE EXPERIENCE: GETTING AROUND	Regular and high quality maintenance	There is regular repair to surfaces, cutting back overhanging vegetation, removing obstacles.	As part of its duty of care as the landowner, UDX is responsible for maintaining and repairing the Lake area and permissive route.
		Maintenance team are trained in diversity awareness.	As part of its duty of care as the landowner, UDX is responsible for maintaining and repairing the Lake area and permissive route.
	Choice of routes in terms of distance, challenge and visitor experience	Short return routes are included as easier options for visitors with limited mobility or stamina.	Landscape and means of access details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
	Good wayfinding	There is good information at key decision points so people can find their way around.	Landscape and means of access details to be provided in the compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
	Seating	Regular seating provides resting points, particularly to reduce impact of gradients and distances.	Landscape details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS

4.2 Accessible Green Space

ACCESS CHAIN - VISITOR EXPERIENCE	INDICATORS OF GOOD PRACTICE		HOW DOES PROPOSED DEVELOPMENT MEET THE CRITERIA?
3. ON-SITE EXPERIENCE: INFORMATION AND INTERPRETATION	Key information is accessible to all visitors	Information is designed to principles of inclusive design and Cymraeg Clir/ Plain English.	Landscape details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
		Information uses appropriate terminology and promotes diversity through the range of people portrayed and the issues highlighted, eg gender-neutral toilets, Changing Places facility, visitor guides in different languages.	Landscape details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS
		Symbols and pictures accompany text.	Landscape details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
	Alternative formats are available	Information is available in alternative formats to text such as Braille, Large Print, audio and Widgit symbols (available from the Customer Enquiry Team).	Landscape details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
		Interpretation in other formats beyond text, including tactile.	Landscape details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
	Information is well positioned	On-site information, such as display boards, are at a height and angle where they can be accessed by children, wheelchair users and people of short stature	Landscape details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS
	Good wayfinding	There is good information at key decision points so people can find their way around.	Landscape and means of access details to be provided in the compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.

4.2 Accessible Green Space

ACCESS CHAIN - VISITOR EXPERIENCE	INDICATORS OF GOOD PRACTICE		HOW DOES PROPOSED DEVELOPMENT MEET THE CRITERIA?
4. RETURN HOME	Exits are clearly signed and easy to use	Exit points are clearly marked on maps and visitor information, and well signed on site.	On site information to be provided in the compliance plan. Off-site information is not available separately; however, visitors will find relevant details on Universal's Theme Park website.
		Exits are shared by different visitors (ie not separate for wheelchair users).	Landscape and means of access details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
	Exits are within easy reach of parking and public transport	Public transport and pick-up points are within easy reach of exits.	The Lakes area is a privately owned green space with no dedicated transport options. However, the broader site offers various transport options, including train stations and bus stops.

4.3 Urban Nature Recovery

CONTRIBUTION TO NATURE RECOVERY

4.3.1 Urban nature recovery aims to boost nature recovery, create and restore rich wildlife habitats and build resilience to climate change. Incorporating nature-based solutions, including trees and wildlife grassland, into the design of towns and cities will increase carbon capture, reduce flooding and help to moderate temperatures during heatwave.

4.3.2 The proposed design focuses on optimising existing vegetation while introducing additional habitats to enhance overall habitat quality and connectivity on site and with the wider landscape. It includes the enhancement and restoration of existing habitats, compensation for lost habitats due to the development areas. These habitats collectively contribute to urban nature recovery by balancing restoration with creation of wildlife rich habitats.

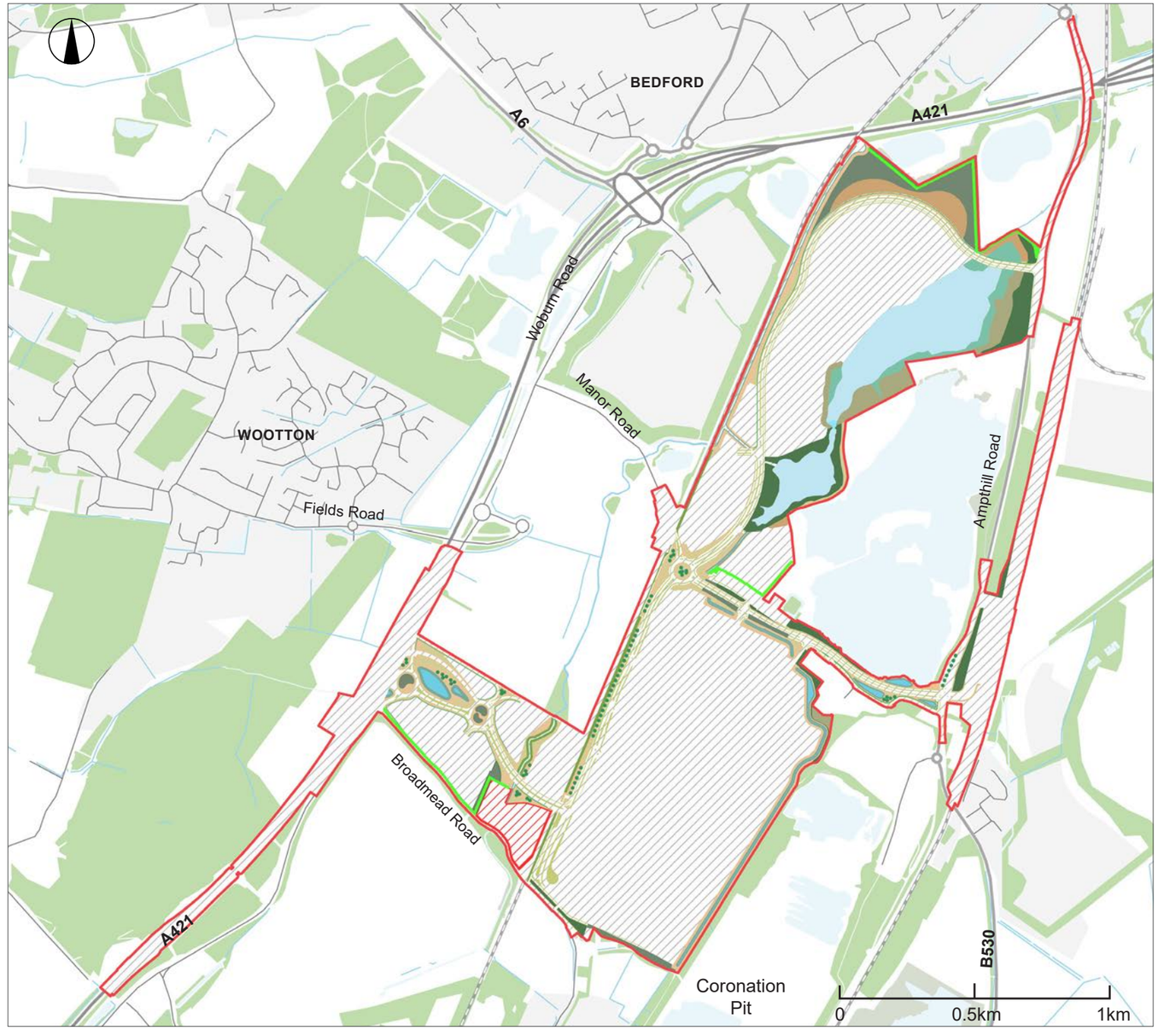


Figure 24: Contribution to Nature Recovery Map

4.3 Urban Nature Recovery

CREATION OF WILDLIFE RICH ENVIRONMENT

4.3.3 The proposals aim to provide an environment which can support a diversity of wildlife; these include species rich and wet grassland, woodland and scrub, and hedgerows that have the potential to encourage future use by protected species. These environments are spatially positioned around the development areas to retain and enhance ecological connectivity and link to existing wildlife areas outside the Site.

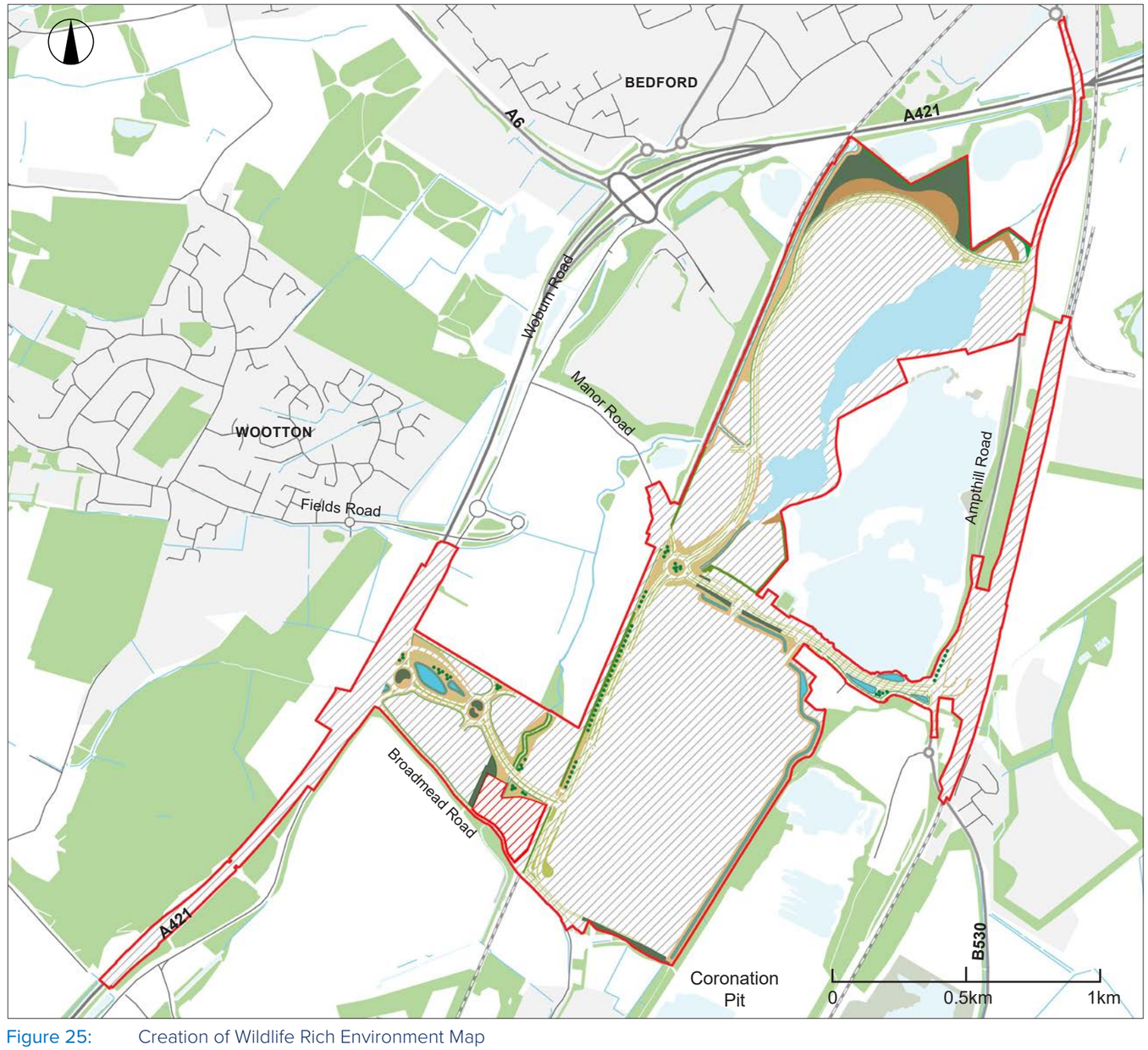


Figure 25: Creation of Wildlife Rich Environment Map

4.3 Urban Nature Recovery

RESTORATION OF WILDLIFE RICH HABITAT

4.3.4 Habitat restoration efforts are focused on retaining and improving existing habitats and compensating for any lost caused by the development areas. Restoration is comprised of the provision of additional woodland planting, woodland edge planting, scrub planting, reedbeds along the lake margins, native hedgerows and semi-mature trees.

Figure 26: Restoration of Wildlife Rich Habitat Map

4.4 Urban Greening Factor (UGF)

4.4.1 Urban Greening Factor (UGF) is a planning tool that improves the provision of green infrastructure and increases the level of greening in urban environments. The recommended minimum target is 0.3 for commercial development. When adopted by a local planning authority it provides clarity about the quantity and quality of green infrastructure required to secure planning approval in a major new development.

4.4.2 Based on current evaluation, the Proposed Development achieves an UGF **0.38.**

4.4.3 Development areas are subject to further design and therefore have been given a score factor of 0.0. However, the aspiration is to achieve 30% of vegetation cover across these areas resulting in an improved overall urban greening factor score.

Table 2: UGF Calculation

NO.	SURFACE COVER TYPE	AREA (M2)	FACTOR	VALUE
1	Semi-natural vegetation and wetlands retained on site (including existing / mature trees)	443,519	1.0	443,519
2	Semi-natural vegetation established on site	279,973	1.0	279,973
3	Standard / semi-mature trees (planted in connected tree pits)	0	0.9	0
4	Native hedgerow planting (using mixed native species)	10,773	0.8	8,618.4
5	Standard / semi-mature trees (planted in individual tree pits)	77	0.7	53.9
6	Food growing, orchards and allotments	0	0.7	0
7	Flower rich perennial and herbaceous planting	0	0.7	0
8	Single Species or mixed hedge planting (including linear planting of mature shrubs)	0	0.6	0
9	Amenity shrub and ground cover planting	0	0.5	0
10	Amenity grasslands including formal lawns	87,501	0.4	35,000.4
11	Intensive green roof (meets the Green Roof Organisation / GRO Code)	0	0.8	0
12	Extensive biodiverse green roof (meets the GRO Code, may include Biosolar)	0	0.7	0
13	Extensive green roof (meets GRO Code)	0	0.5	0
14	Extensive sedum only green roof (does not meet the GRO Code)	0	0.3	0
15	Green facades and modular living walls (rooted in soil or with irrigation)	0	0.5	0
16	Wetlands and semi-natural open water	241,062.6	1.0	241,062.6
17	Rain gardens and vegetated attenuation basins	0	0.7	0
18	Open swales and unplanted detention basins	58,719	0.5	29,359.5
19	Water features (unplanted and chlorinated)	0	0.2	0
20	Open aggregate and granular paving	0	0.2	0
21	Partially sealed and semi-permeable paving	0	0.1	0
22	Sealed paving (including concrete and asphalt)	191,519	0.0	0
23	Development areas subject to final design*	1,343,003	0.0	0

Total Value	1,037,586.8
Total Development Site Area (m2)	2,712,718.6
Urban Greening Factor	**0.38**

* This line has been added to provide a more accurate narrative since currently there are development areas subject to final design shown as hatched areas on the previous Figures.

4.5 Urban Tree Canopy Cover

4.5.1 The purpose of the Urban Tree Canopy Cover is to measure the increase in tree coverage based on existing and proposed new habitats, also taking in consideration the habitats that will need to be removed.

4.5.2 The overall ambition of the Site is to achieve a net increase in tree canopy cover over the entire Site.

4.5.3 The value of urban trees is becoming increasingly clear. They offer numerous advantages, including air purification by absorbing CO^2 and pollutants, and supporting wildlife by providing essential habitats. UDX recognises the importance of trees within the development and the contribution they make to the creation of aesthetic spaces, creating a more atmospheric and pleasant environment for visitors.

Figure 27: Urban Tree Canopy Cover - Precedent Images

5. Conclusions

5.1 GI Strategy Summary

5.2 GI Evaluation Summary

5.3 Response to Natural England's 'What' Principles'

5.1 GI Strategy Summary

5.5.1 The Proposed Development's Green Infrastructure Strategy establishes a comprehensive framework for integrating green and blue infrastructure across the Site, providing a coordinated and holistic approach to environmental design and sustainability.

5.5.2 At its core, the strategy introduces a high-level spatial vision that aligns with Natural England's Green Infrastructure (GI) Framework principles, best practices in sustainable design, and a thorough understanding of the site's context. It integrates multiple workstreams, targeted environmental enhancements, and impact mitigation measures to deliver a resilient and sustainable development.

5.5.3 The GI Strategy translates overarching GI Design Principles into a series of key spatial interventions that respond to site-specific opportunities:

Improve Green Connections and Biodiversity

5.5.4 This key spatial move focuses on strengthening ecological corridors and reconnecting fragmented habitats to support biodiversity and ecosystem resilience. The strategy integrates green corridors, including ecological and green connectors, within the existing and proposed infrastructure, forming a cohesive network of natural spaces. Green crossings for roads and railways ensure safe passage for both wildlife and people. In areas like the Lakes Zone, Ecological Enhancement Areas, native planting, and sustainable water management contribute to urban nature recovery while improving access to high quality natural green space.

Establish an Active Travel Network

5.5.5 The Proposed Development promotes a well-connected, accessible, and sustainable active travel network. Enhancements to pedestrian-friendly routes, dedicated cycling paths, and key transport hubs create seamless, low-carbon travel options. The walking network prioritises safe, continuous pathways linking key destinations, while the cycling network introduces segregated lanes and shared routes for efficient mobility. Sustainable transport is further supported by integrated bus stops, train stations, and transport hubs, reducing congestion, improving air quality, and sustainable travel choices.

Celebrate Unique Landscape Features

5.5.6 The strategy highlights the Site's distinct natural and cultural elements, enhancing the landscape's identity and visitor experience. Key entry points, both primary and secondary gateways, are identified to define a strong sense of arrival and sequencing of experience, as well as opportunities for views offer scenic vistas that strengthen the connection between people and nature. Through thoughtful visual and spatial integration, the Proposed Development fosters a deeper appreciation of the landscape's unique character.

Integrated Water Management Systems

5.5.7 A resilient water management approach is embedded within the landscape to enhance ecological functions and mitigate flood risks. The relocation of the Core Zone watercourse along the Site's eastern boundary includes a 10m riparian protection zone, reinforcing riverbanks, reducing pollution, and improving habitat connectivity. In the Lake Zone, disused clay pits are repurposed into strategic wetland attenuation features, supporting biodiversity while managing water storage and reuse. Sustainable drainage solutions, such as rainwater harvesting and controlled discharge mechanisms ensure effective surface water management, safeguard local hydrology, and enhance both ecological and recreational value.

5.5.8 This Green Infrastructure Strategy provides a structured and forward-thinking approach to sustainable placemaking. By integrating ecological restoration, active travel networks, cultural identity, and climate-resilient water management, it ensures a dynamic, interconnected, and environmentally responsible development. Through strategic interventions and long-term stewardship, the Proposed Development will serve as a model for green infrastructure innovation, fostering both environmental and social benefits.

5.2 GI Evaluation Summary

5.2.1 The evaluation of the GI Strategy following NE's GI Framework Standards S2 to S5, demonstrates that the Proposed Development meets and exceeds these requirements.

S2 – Accessible Green Space

5.2.2 The Proposed Development proposes a privately owned green space around the Lakes, designed to provide public access and support responsible and sustainable management practices. Given the nature of the Proposed Development, the Proposed Development will align with relevant accessibility indicators outlined in By All Reasonable Means (BARM) to promote inclusive access.

Decision to Visit

5.2.3 The Proposed Development will offer off-site information to help visitors plan their trip, including details on the accessibility of Lakes area facilities, accessible routes, parking, opening times, and travel options.

Journey and Arrival

5.2.4 The Lakes area is seamlessly integrated into the proposed active travel network, allowing visitors to arrive on foot, by bicycle, or via public transport. Access points will be clearly signed and accessible for visitors of all abilities, with details provided in the Compliance Plan.

On-Site Experience

5.2.5 A good provision of seating and shelter will be incorporated, with specifications detailed in the Compliance Plan. UDX, as the landowner, will be responsible for the ongoing maintenance and repair of the Lakes area and permissive routes, including, regular surface repairs, trimming overhanging vegetation, and removing obstacles to ensure safe access. The Lake path will offer multiple route options, catering to different distances, challenges, and visitor experiences (to be detailed in the Compliance Plan). The Wayfinding strategy will ensure clear navigation with information at key decision points, making it easy for visitors to find their way around, supported by regular seating areas. Both the Compliance Plan and Wayfinding strategy will provide detailed guidance on signage, interpretation, and visitor information throughout the Lakes area.

Return Home

5.2.6 Exit points will be clearly signed and accessible for visitors of all abilities, with details provided in the Compliance Plan. Exit points will be conveniently located near public transport, ensuring ease of departure for all visitors.

S3 – Urban Nature Recovery

5.2.7 The GI proposal demonstrates the Proposed Development's contribution to nature recovery through the creation and restoration of wildlife-rich habitats.

5.2.8 The strategy prioritises enhancing existing vegetation while introducing new habitats to improve overall habitat quality and connectivity, both within the site and across the wider landscape. Key proposals include:

- Enhancing and restoring existing habitats to strengthen biodiversity, such as new areas of marginal planting and the creation of islands within the lake to provide nesting opportunities for birds,
- The formation of ecological enhancement areas to the north of the Lake Zone,
- Creating new wildlife-rich habitats to further elevate the site's ecological value, such as new extensive areas of species rich grassland along roadside verges, with belts of woodland and trees suitable for invertebrates, birds, and other wildlife

5.2.9 By integrating these measures, the GI proposal ensures a resilient and ecologically diverse environment, supporting long-term nature recovery.

S4 – Urban Greening Factor (UGF)

5.2.10 The UGF for the Proposed Development achieves a 0.38 score which meets and exceeds the 0.3 benchmark set for major commercial developments in Natural England's GI Framework.

5.2.11 Currently, some developable areas are subject to final design, such as the area identified for the theme park, and these have been assigned a provisional UGF score of 0.0. However, the Proposed Development aims to take a similar approach in achieving green cover across the site which it is anticipated will ultimately improve the overall UGF score.

S5 – Urban Tree Canopy Cover

5.2.12 The Proposed Development aims to increase Urban Tree Canopy Cover, balancing new plantings with removals. This net increase will enhance air quality, support wildlife, and create aesthetically pleasing spaces. Future landscape design will prioritise trees and green spaces to maximise canopy cover.

5.3 Response to Natural England's 'What' Principles

5.3.1 This is how the GI Strategy responds to NE's 'What' Principles:

Multifunctional - GI delivers multiple functions and benefits

5.3.2 The Site design emphasises integrating nature and active travel, encouraging interaction with the landscape and wildlife. Nature-based solutions would enhance biodiversity, connect habitats, and attract diverse species, including more wildfowl. Features like play stops promote family engagement, offering safe exploration and interaction with nature. Drainage and ecological strategies are interlinked, utilising watercourses and lakes for both water management and creating biodiverse habitats.

Varied - GI includes a mix of types and sizes that can provide a range of functions and benefits to address specific issues and needs

5.3.3 Active travel proposals connect with wider networks and offer sustainable travel choices for local and longer distance journeys. They also offer opportunities to engage with nature and enjoy views of surrounding landscapes, such as wildlife ponds and County Wildlife Sites. Wayfinding will optimize route use. Species-rich roadside verges will connect habitats for invertebrates, birds, and other wildlife. Proposed green infrastructure (GI) includes ecological enhancement areas, grasslands, swales, SuDS features, formal landscaping, and water elements like ponds, lakes, and streams.

Connected - GI connects as a living network for people and nature at all scales, connecting provision of GI with those who need its benefits

5.3.4 New drainage channels will manage surface water, reduce flood risk, and connect with historic water bodies, supporting climate change resilience. Watercourse and habitat corridors, including Elstow Brook and ecological enhancement areas, will form a network of habitats for diverse species connecting to the wider landscape. Species-rich grass verges aid water management, support local biodiversity, and enhance the landscape along active travel routes. Boardwalks near open water in the Lake Zone could offer scenic walking paths within valuable habitats, complemented by interpretive boards to educate visitors and protect the environment.

Accessible - GI creates green, liveable places where everyone has access to good quality green and blue spaces routes and features

5.3.5 New perimeter access routes will enhance active travel, linking Bedford, Stewartby/Wootton, and Wixams while avoiding busy traffic areas. Appropriate hierarchy of surfaces and Wayfinding strategy will promote preferred routes and through passive surveillance help to reduce potential anti social behaviour. Increased use by families and groups will enable passive monitoring of these routes. Low-intensity access through ecological enhancement areas (EEA) will allow engagement with semi-natural habitats that support important local wildlife.

Responds to Local Character - GI responds to an area's character

5.3.6 Native species will preserve the area's landscape character, while Ecological Enhancement Areas in the Lake Zone will enhance biodiversity and water management, maintaining the character of former industrial lakes. Gateways and signage will promote clear and accessible routes. Green links, created with locally occurring shrubs and trees, will reflect the regional character of hedgerows and woodlands.

UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT

Former Kempston Hardwick Brickworks and adjoining land, Bedford

Design and Access Statement Appendix 1 - Green Infrastructure Statement

Annex 1

Revision number: 00

Date: June 2025

Content

1. Context Mapping

1.1 Location

1.2 Landscape Form and Identity

- Topography
- Setting
- Local Landscape Character
- Cultural Heritage
- Landscape Types
- Demographics

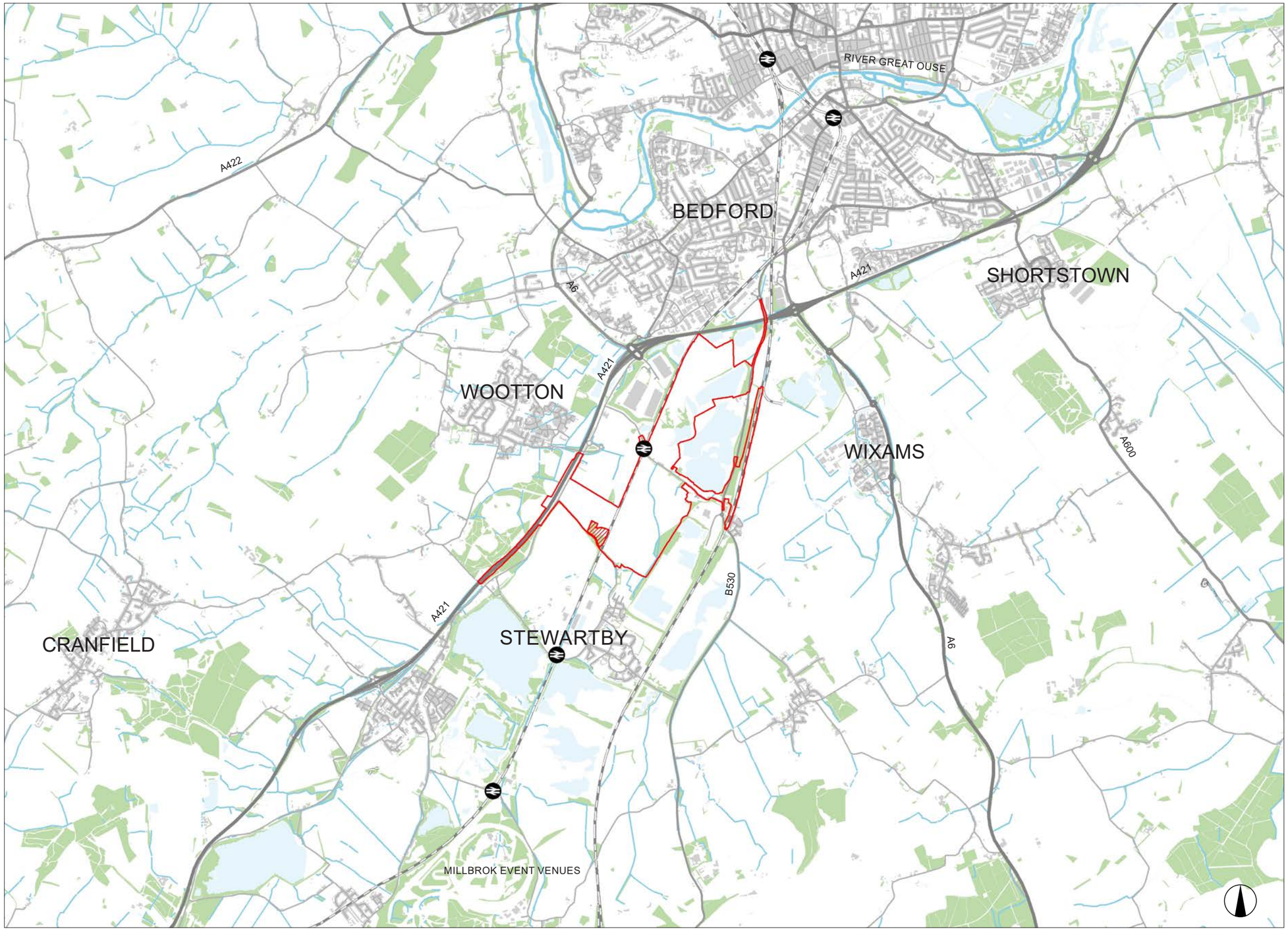
1.3 Access and Connectivity

- Walking
- Cycling
- Equestrian
- Sustainable Transport
- Index of Multiple Deprivation (IMD)
- Accessibility

1.4 Nature Based Systems

- Green Infrastructure
- Tree Cover
- Blue Infrastructure
- Surface Water Regime Survey

1.1 Location



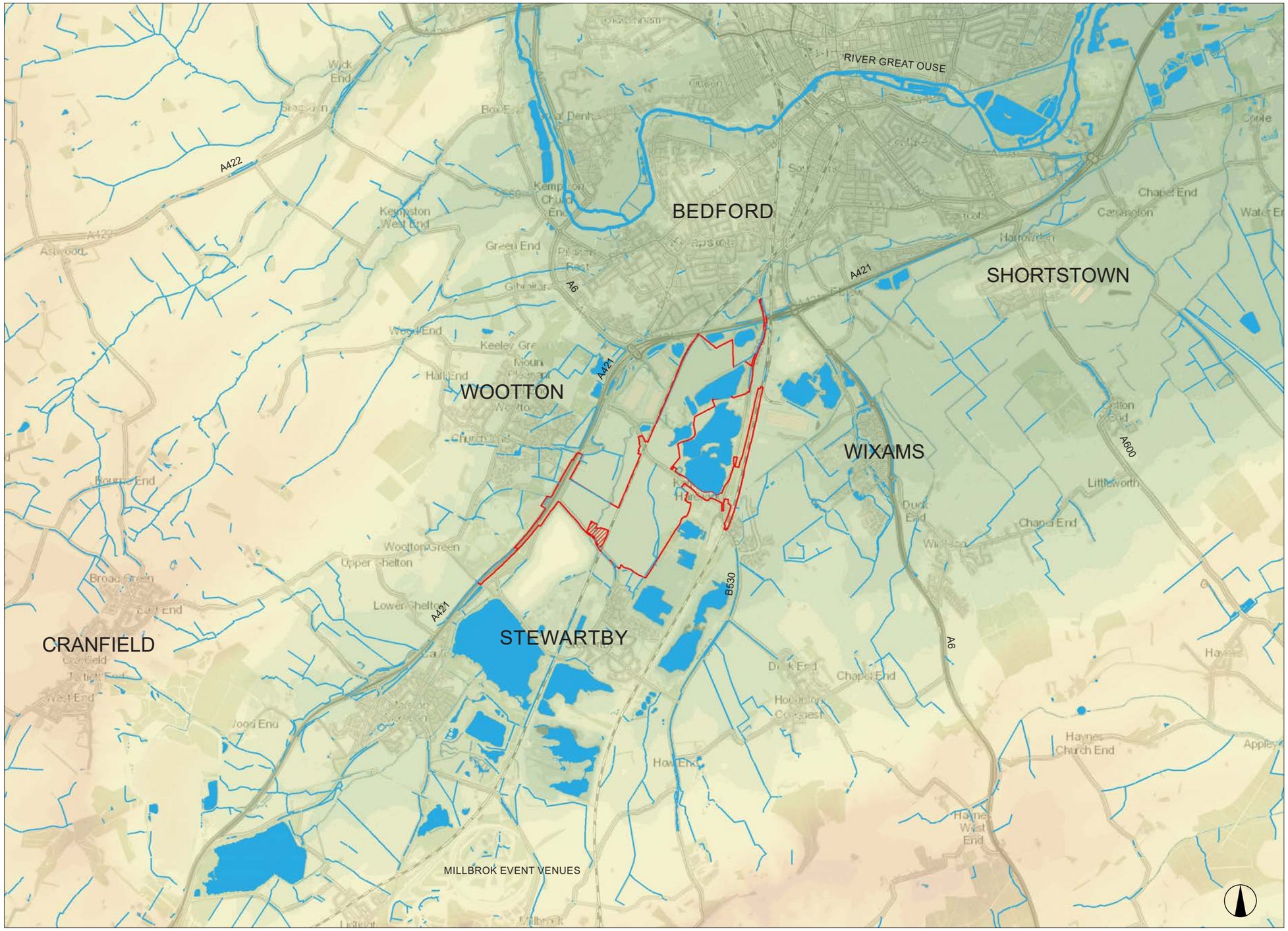
SITE LOCATION

Key

- Site Boundary
- Omitted From Site Boundary
- Primary Road
- A Road
- B road
- Minor Road
- Local Street
- Railway
- Railway Station
- Statutory Main River
- River/Stream
- Waterbody
- Woodland
- Building

0 1000 2000m

1.2 Landscape Form and Identity



TOPOGRAPHY

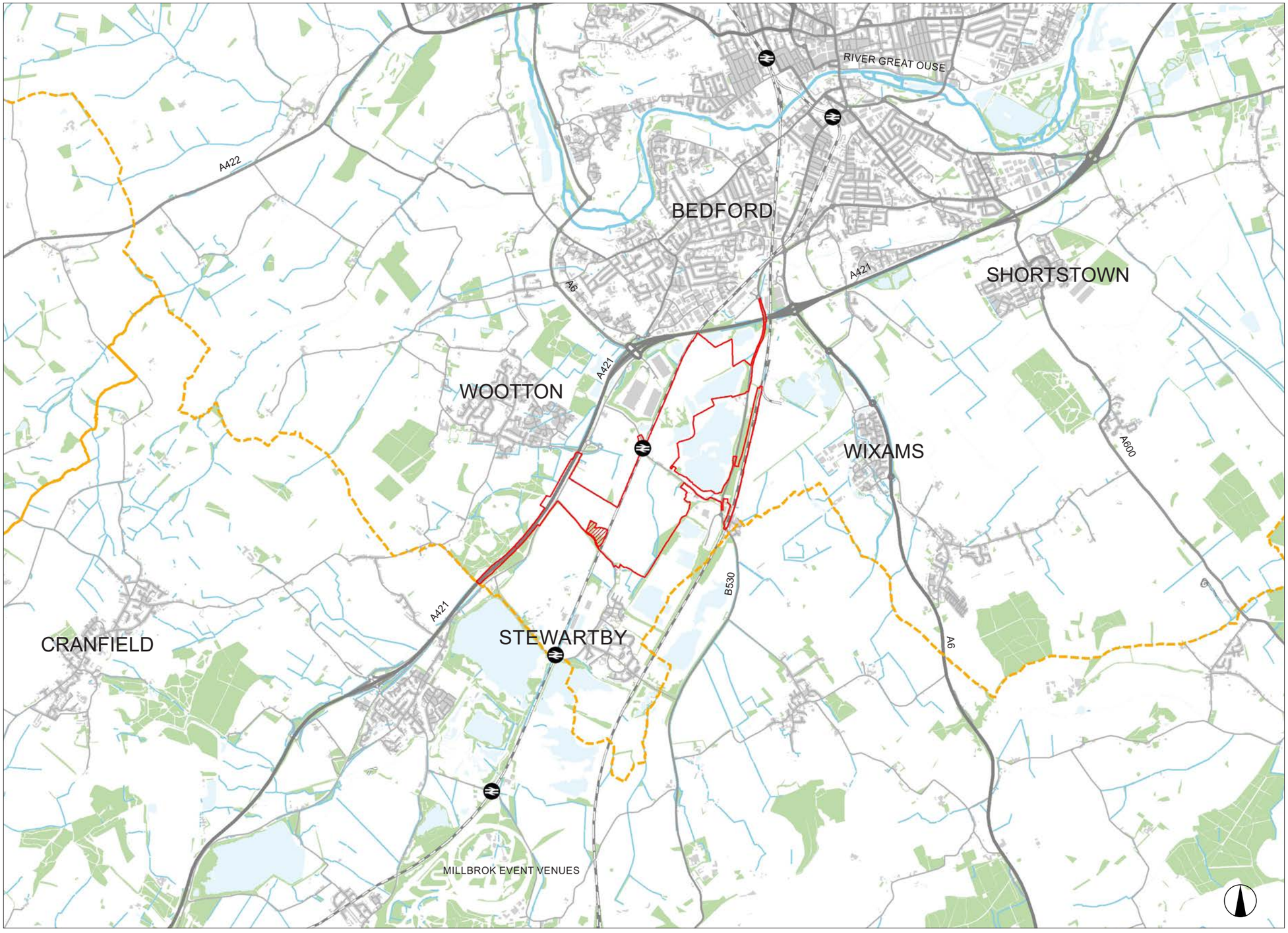
Key

- Site Boundary
- Omitted From Site Boundary
- 7 - 10m
- 10 - 20m
- 20 - 30m
- 30 - 40m
- 40 - 50m
- 50 - 60m
- 60 - 70m
- 70 - 80m
- 80 - 90m
- 90 - 100m
- 100 - 110m
- 110 - 120m
- 120 - 130m
- 130 - 140m
- 140 - 150m
- 150 - 160m
- 160 - 170m
- 170 - 180m
- 180 - 190m
- 190 - 200m
- 200 - 210m
- 210 - 220m
- Statutory Main River
- River/Stream
- Waterbody

0 1000 2000m

1.2 Landscape Form and Identity

SETTING

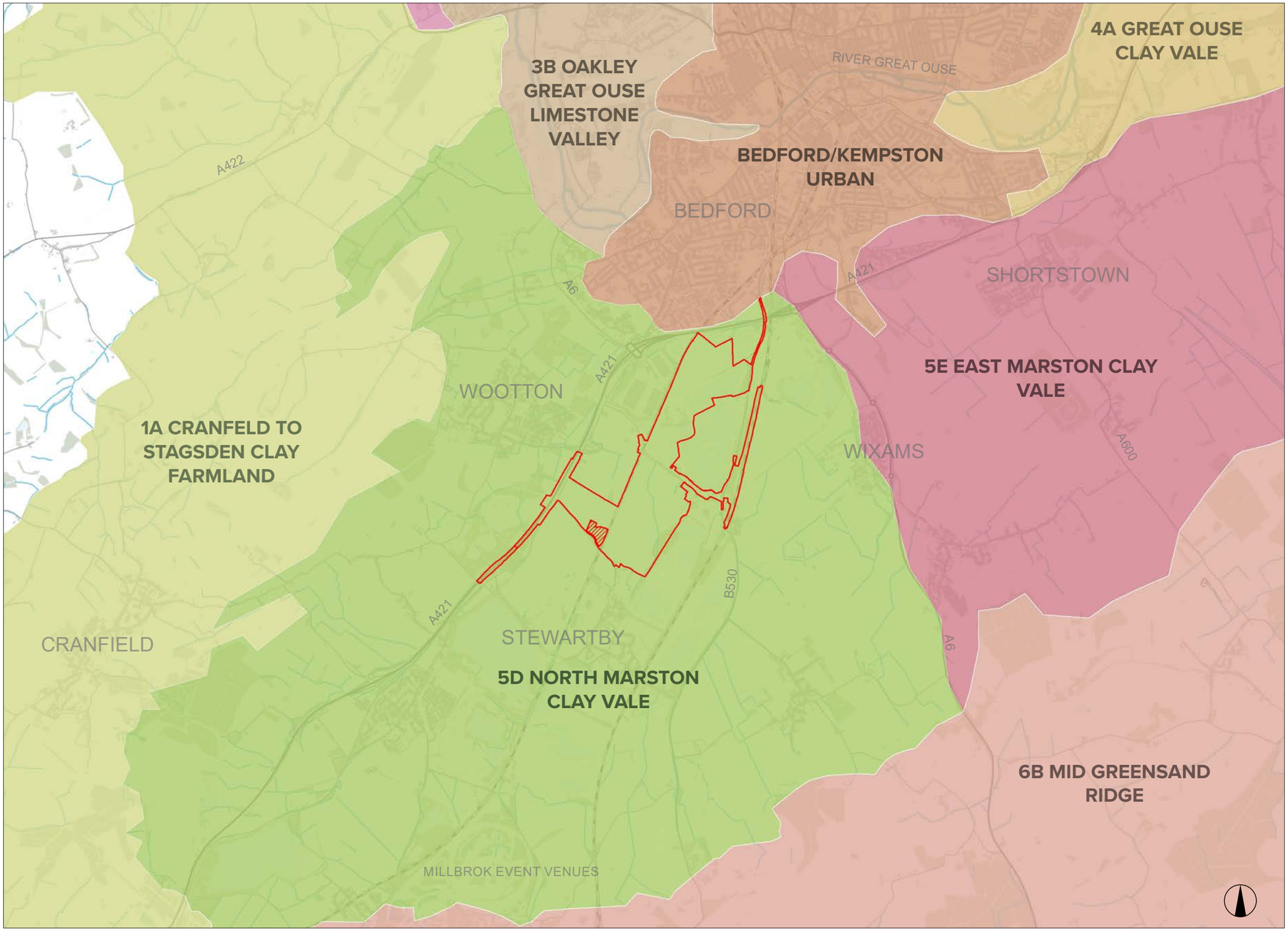


Key

- Site Boundary
- Omitted From Site Boundary
- Local Authority Boundary
- Primary Road
- A Road
- B road
- Minor Road
- Local Street
- Railway
- Railway Station
- Statutory Main River
- River/Stream
- Waterbody
- Woodland
- Building

0 1000 2000m

1.2 Landscape Form and Identity



LOCAL LANDSCAPE CHARACTER

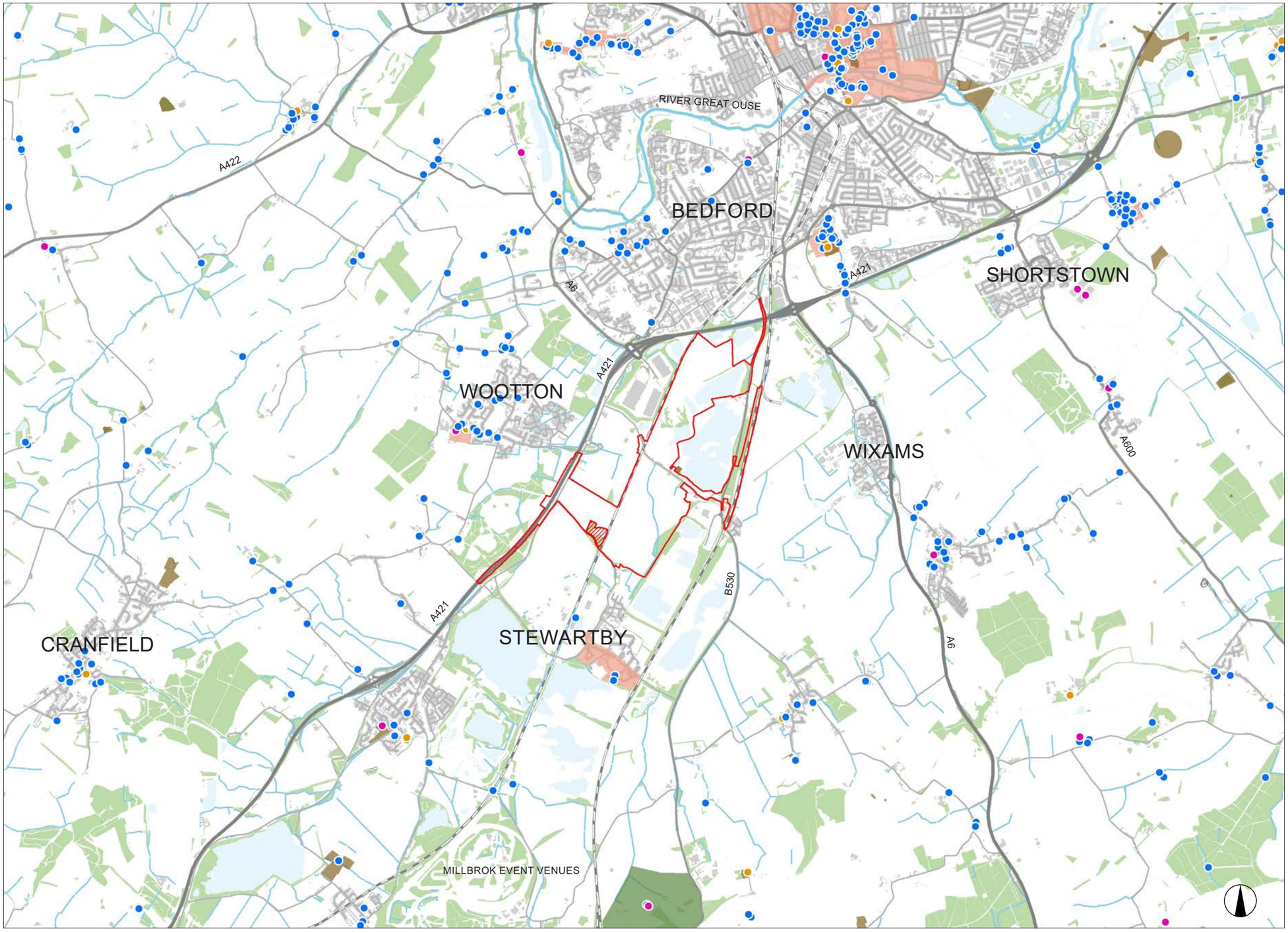
Key

- Site Boundary
- Omitted From Site Boundary
- 5D North Marston Clay Vale
- Bedford/Kempston Urban
- 1A Cranfeld to Stagsden Clay Farmland
- 4A Great Ouse Clay Vale
- 3B Oakley Great Ouse Limestone Valley
- 6B Mid Greensandridge
- 5E East Marston Clay Vale

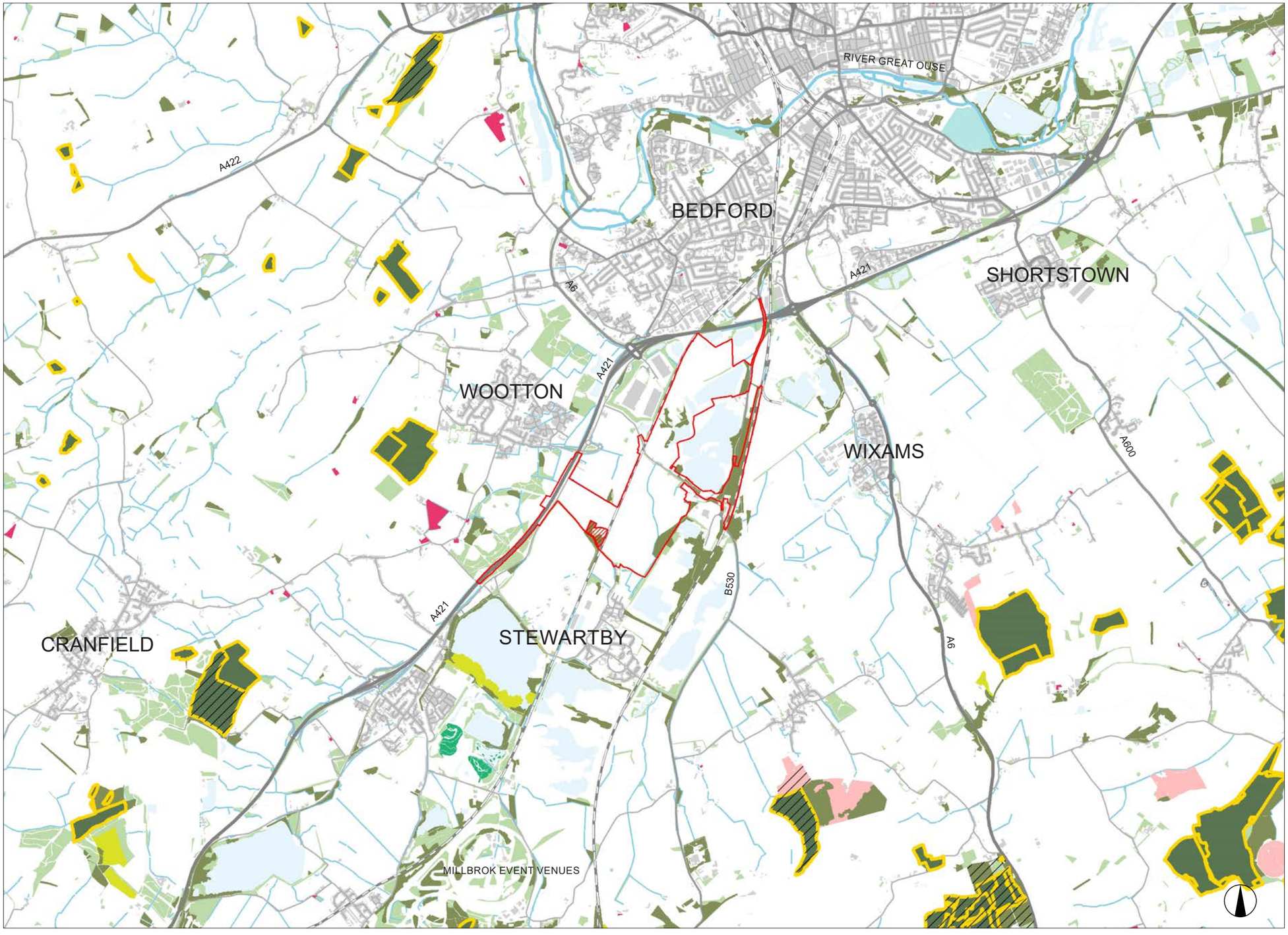
0 1000 2000m

1.2 Landscape Form and Identity

CULTURAL HERITAGE



1.2 Landscape Form and Identity



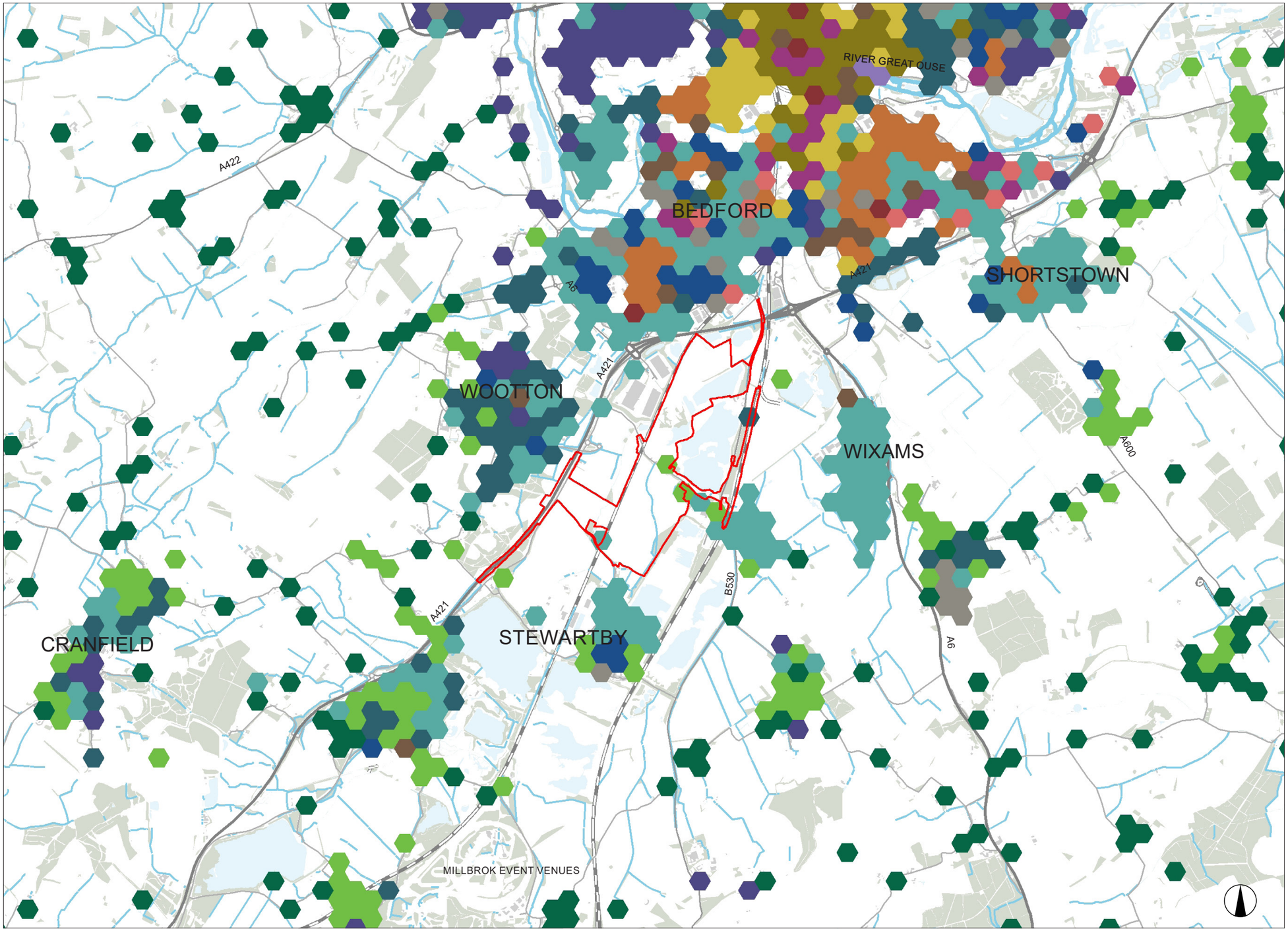
LANDSCAPE TYPES

Key

- Site Boundary
- Omiited From Site Boundary
- Coastal and Floodplain Grazing Marsh
- Deciduous Woodland
- Ancient Woodland Inventory
- Good Quality Semi-improved Grassland
- Lowland Fens
- Lowland Meadows
- Traditional Orchard
- Site of Special Scientific Interest

0 1000 2000m

1.2 Landscape Form and Identity



DEMOGRAPHICS

EXPERIAN MOSAIC SEGMENTATION GROUPS*

** see next page for description of groups*

Key

- Red Line Boundary
- 0.5% - A - City Prosperity
- 10% - B - Prestige Positions
- 5% - C - Country Living
- 8% - D - Rural Reality
- 6% - E - Senior Security
- 6% - F - Suburban Stability
- 13% - G - Domestic Success
- 21% - H - Aspiring Homemakers
- 8% - I - Family Basics
- 4% - J - Transient Renters
- 2% - K - Municipal Tenants
- 4% - L - Vintage Value
- 1% - M - Modest Traditions
- 5% - N - Urban Cohesion
- 6% - O - Rental Hubs

0 1000 2000m

1.2 Landscape Form and Identity

DEMOGRAPHICS

Experian Mosaic Segmentation Groups Description

A - City Prosperity : High status city dwellers living in central locations and pursuing careers with high rewards.

B - Prestige Positions : Established families in large detached homes living upmarket lifestyles.

C - Country Living : Well-off owners in rural locations enjoying the benefits of country life.

D - Rural Reality : Householders living in inexpensive homes in village communities.

E - Senior Security : Elderly people with assets who are enjoying a comfortable retirement.

F - Suburban Stability : Mature suburban owners living settled lives in mid-range housing.

G - Domestic Success : Thriving families who are busy bringing up children and following careers.

H - Aspiring Homemakers : Younger households settling down in housing priced within their means.

I - Family Basics : Families with limited resources who have to budget to make ends meet.

J - Transient Renters : Single people privately renting low cost homes for the short term.

K - Municipal Challenge : Urban renters of social housing facing an array of challenges.

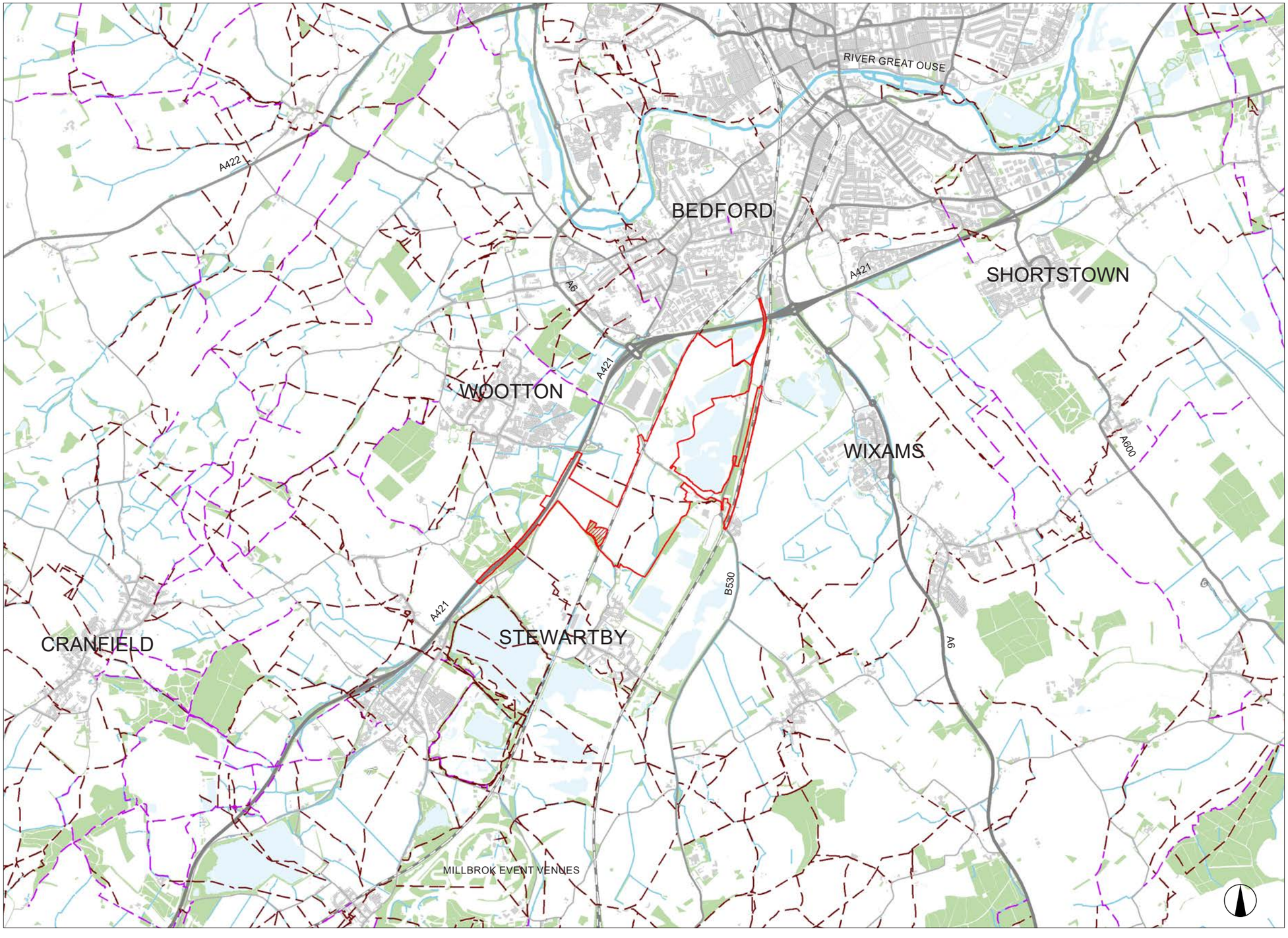
L - Vintage Value : Elderly people reliant on support to meet financial or practical needs.

M - Modest Traditions : Mature homeowners of value homes enjoying stable lifestyles.

N - Urban Cohesion : Residents of settled urban communities with a strong sense of identity.

O - Rental Hubs : Educated young people privately renting in urban neighbourhoods.

1.3 Access and Connectivity



WALKING

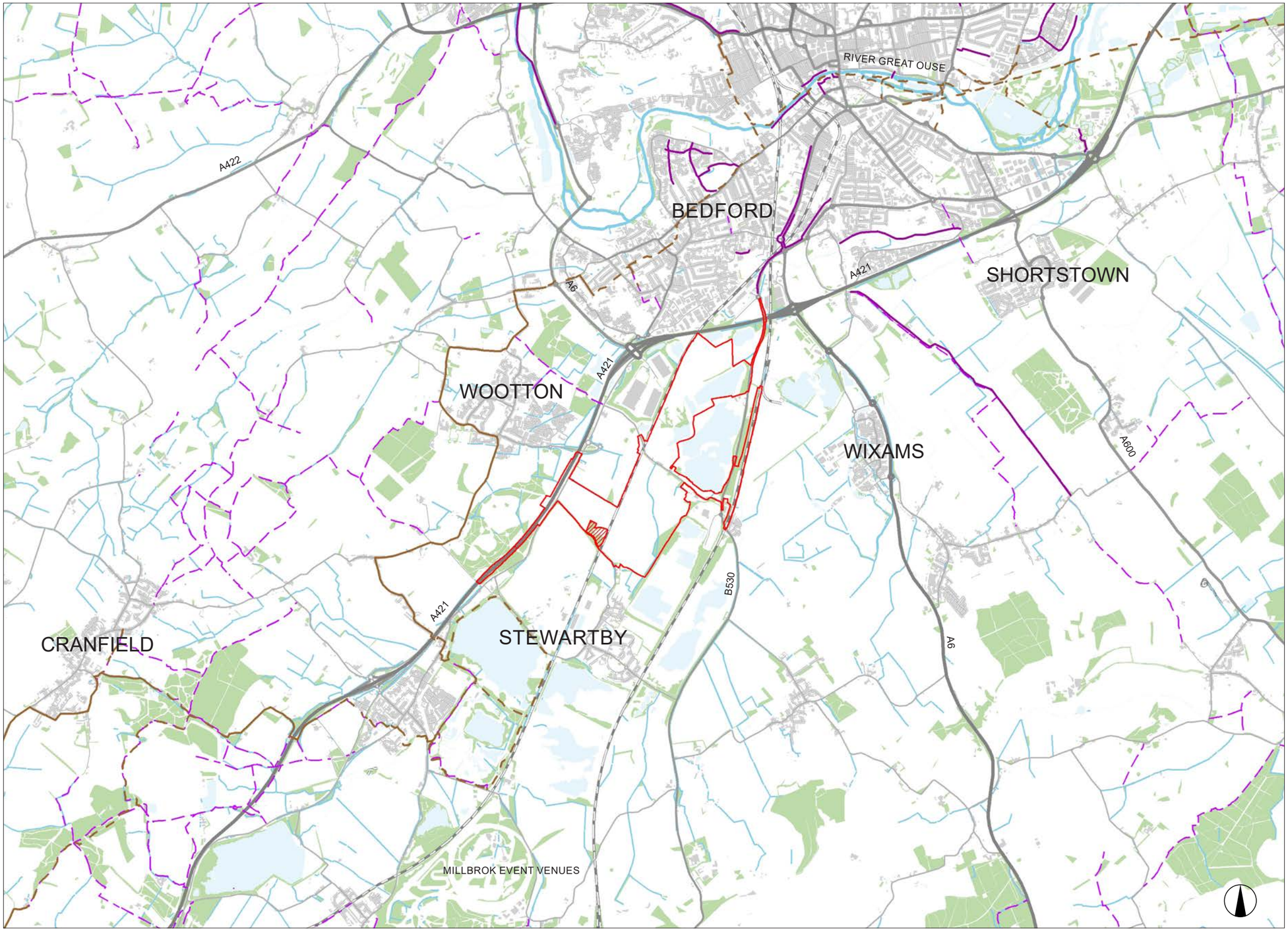
Key

- Site Boundary
- Omitted From Site Boundary
- Bridleway
- Footpath

0 1000 2000m

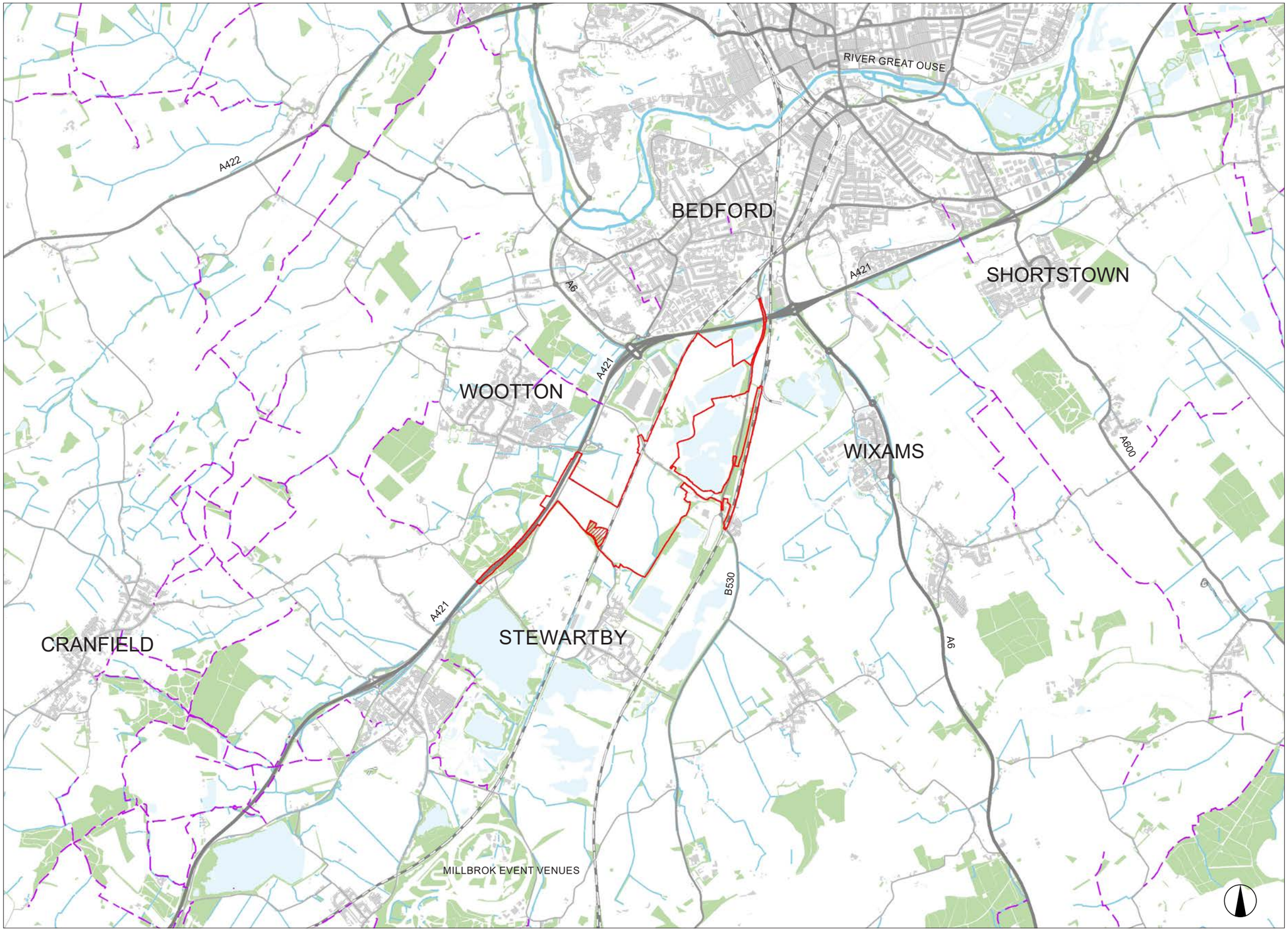
1.3 Access and Connectivity

CYCLING



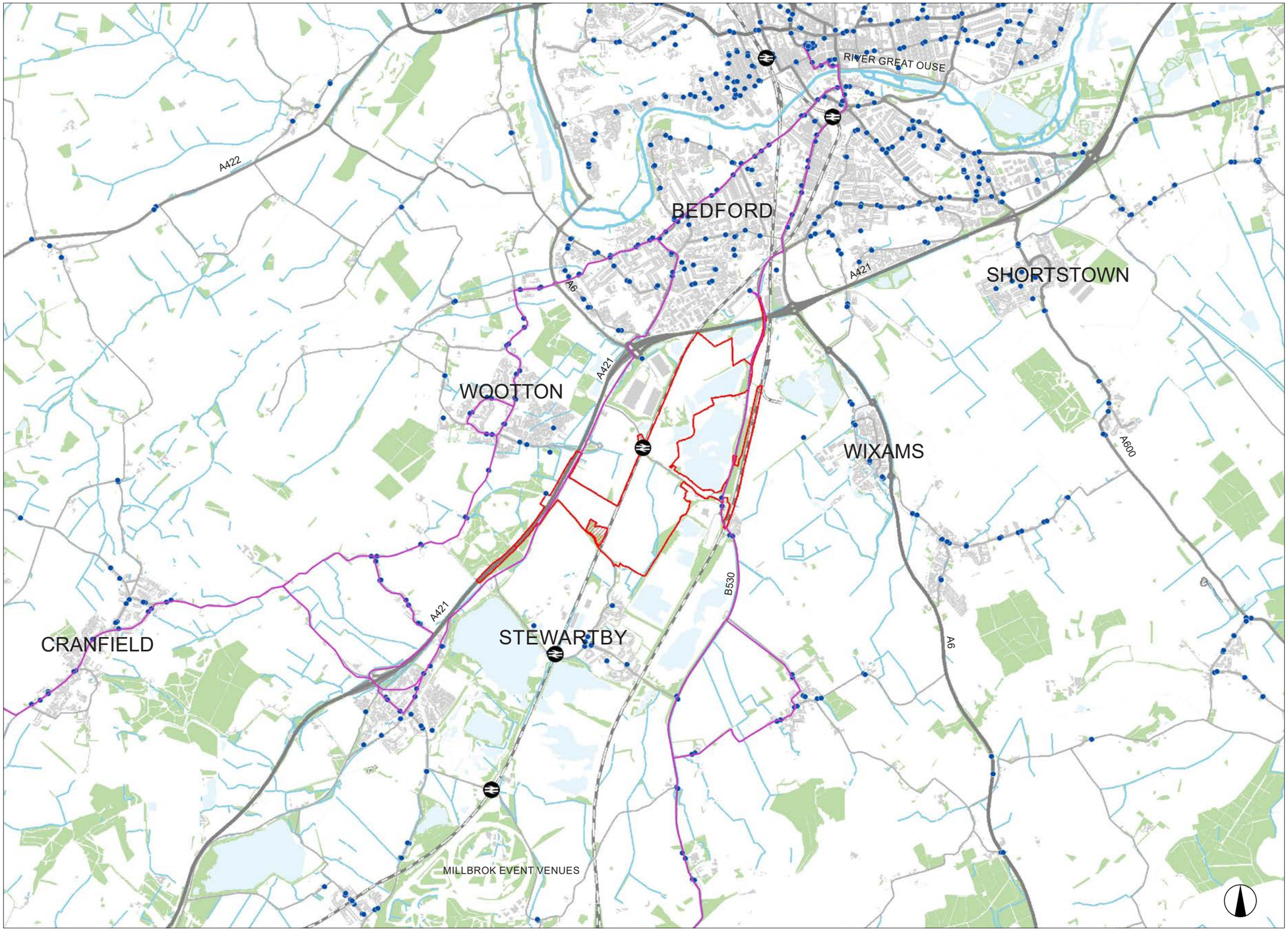
1.3 Access and Connectivity

EQUESTRIAN



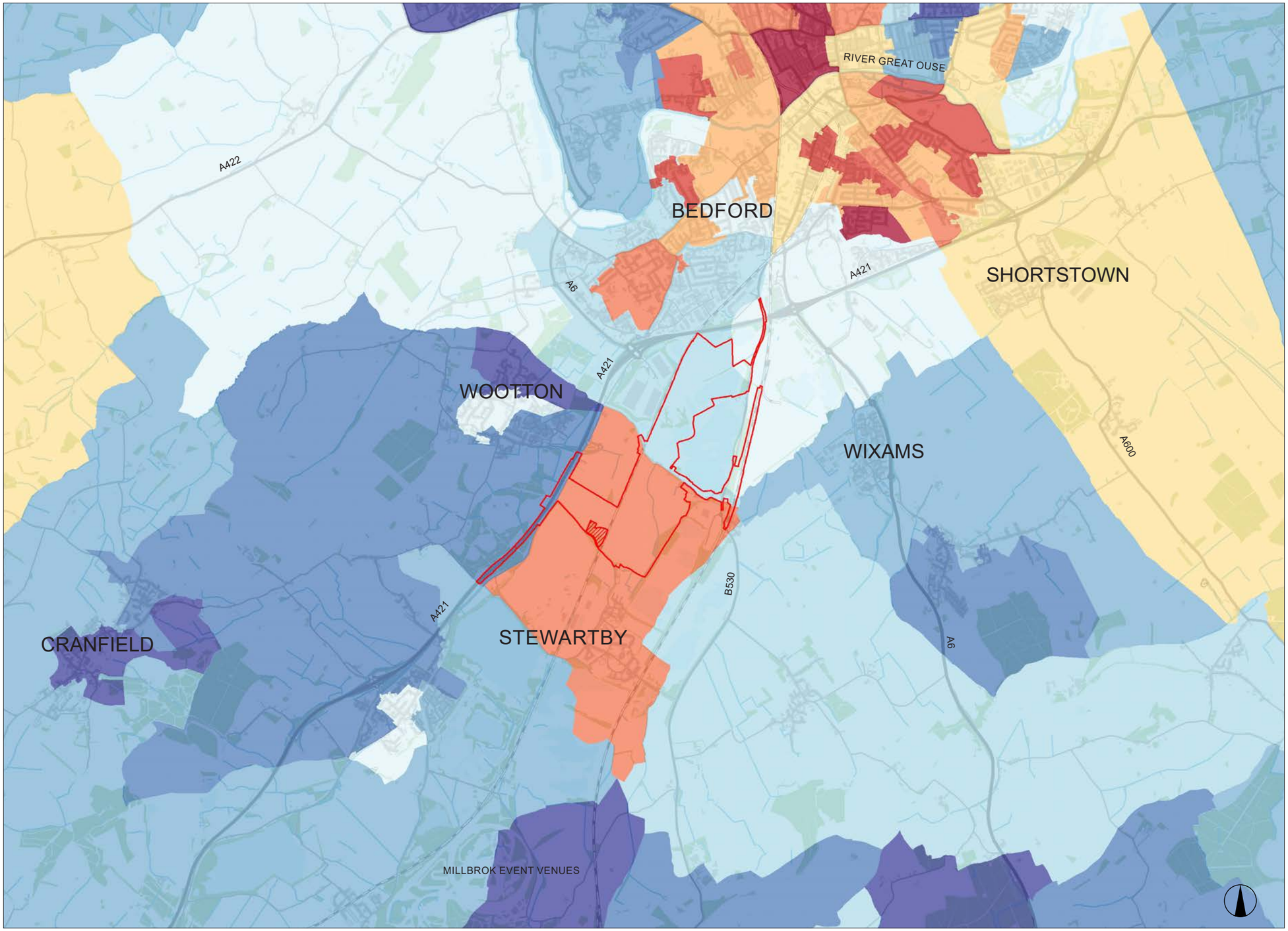
1.3 Access and Connectivity

SUSTAINABLE TRANSPORT

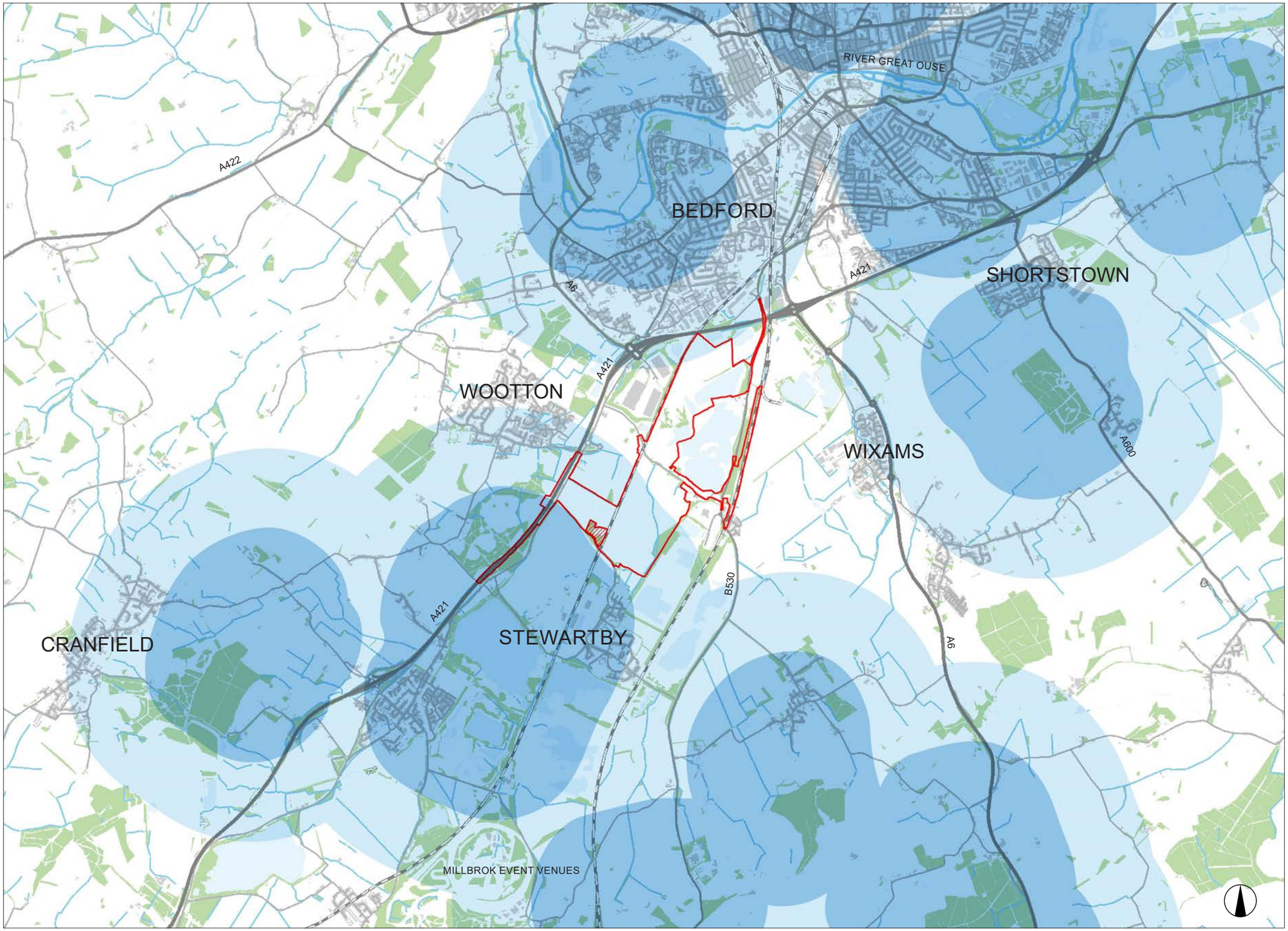


1.3 Access and Connectivity

INDEX OF MULTIPLE DEPRIVATION (IMD)



1.3 Access and Connectivity



ACCESSIBILITY

Key

- Site Boundary
- Omitted From Site Boundary
- AGSt Neighbourhood Standard *
- AGSt Wider Neighbourhood Standard **
- 1Km Buffer from North Lake within RLB
- 2Km Buffer from North Lake within RLB

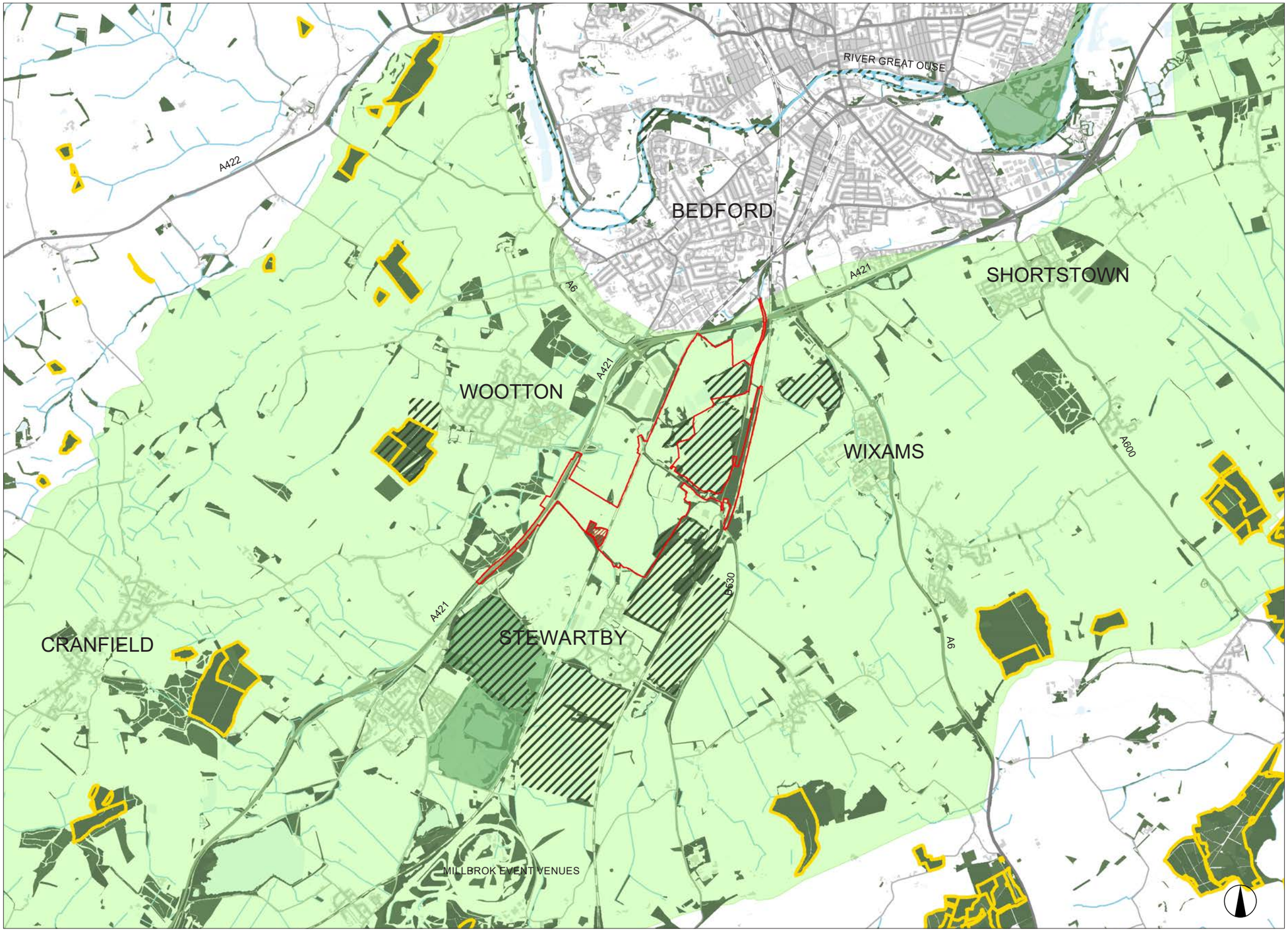
* The Neighbourhood AGSt assessment (A greenspace of at least 10 ha within 1 km). Buffers of 1 km have been created around all greenspaces.

** The Wider Neighbourhood AGSt assessment (A greenspace of at least 20 ha within 2 km). Buffers of 2 km have been created around all greenspaces

Natural England (2025) *Green Infrastructure Map.*

0 1000 2000m

1.4 Nature Based Systems



GREEN INFRASTRUCTURE

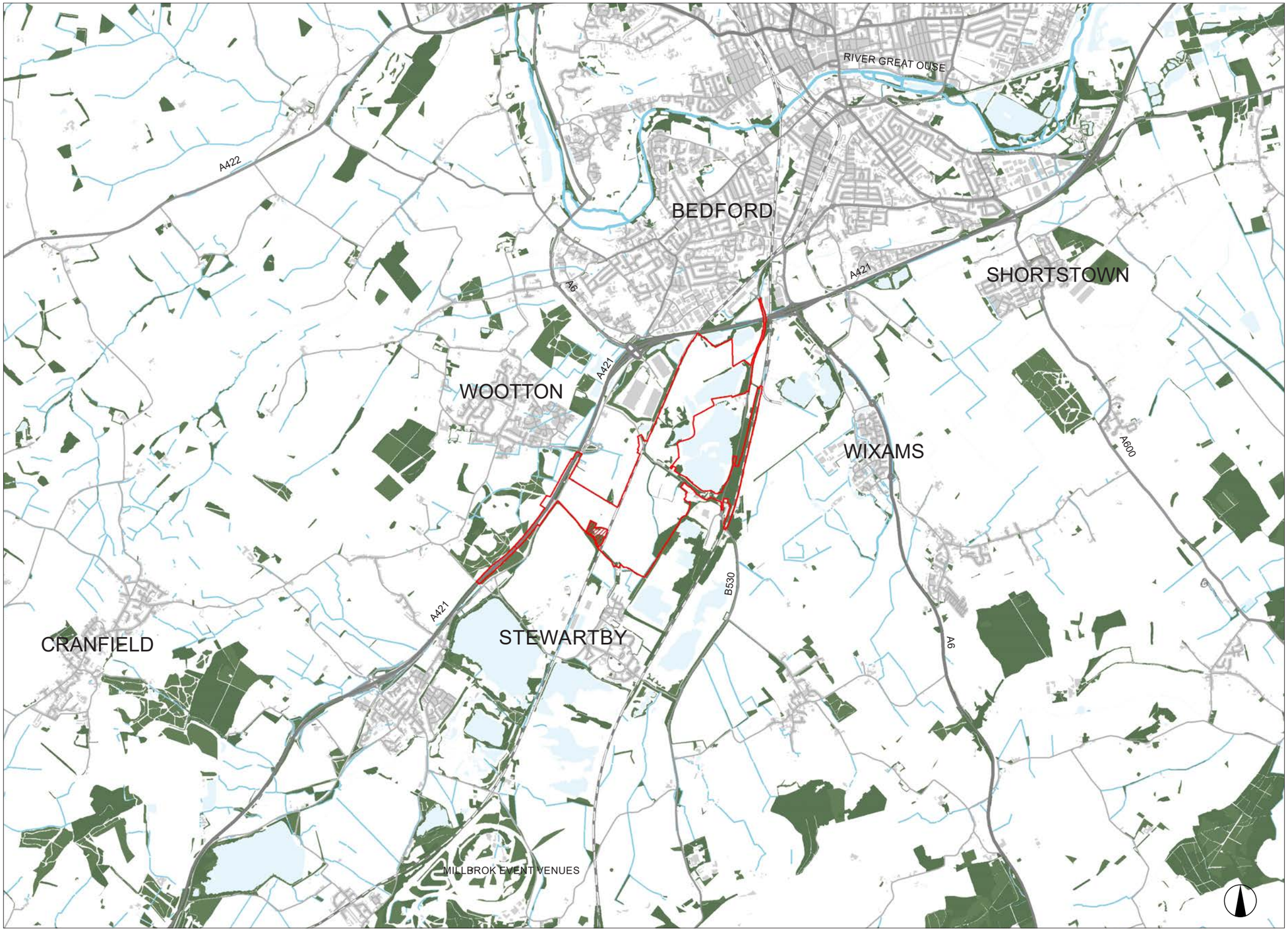
Key

- Site Boundary
- Omitted From Site Boundary
- Ancient Woodland Inventory
- Tree Coverage
- County Wildlife Site
- Country Parks
- Forest of Marston Vale

0 1000 2000m

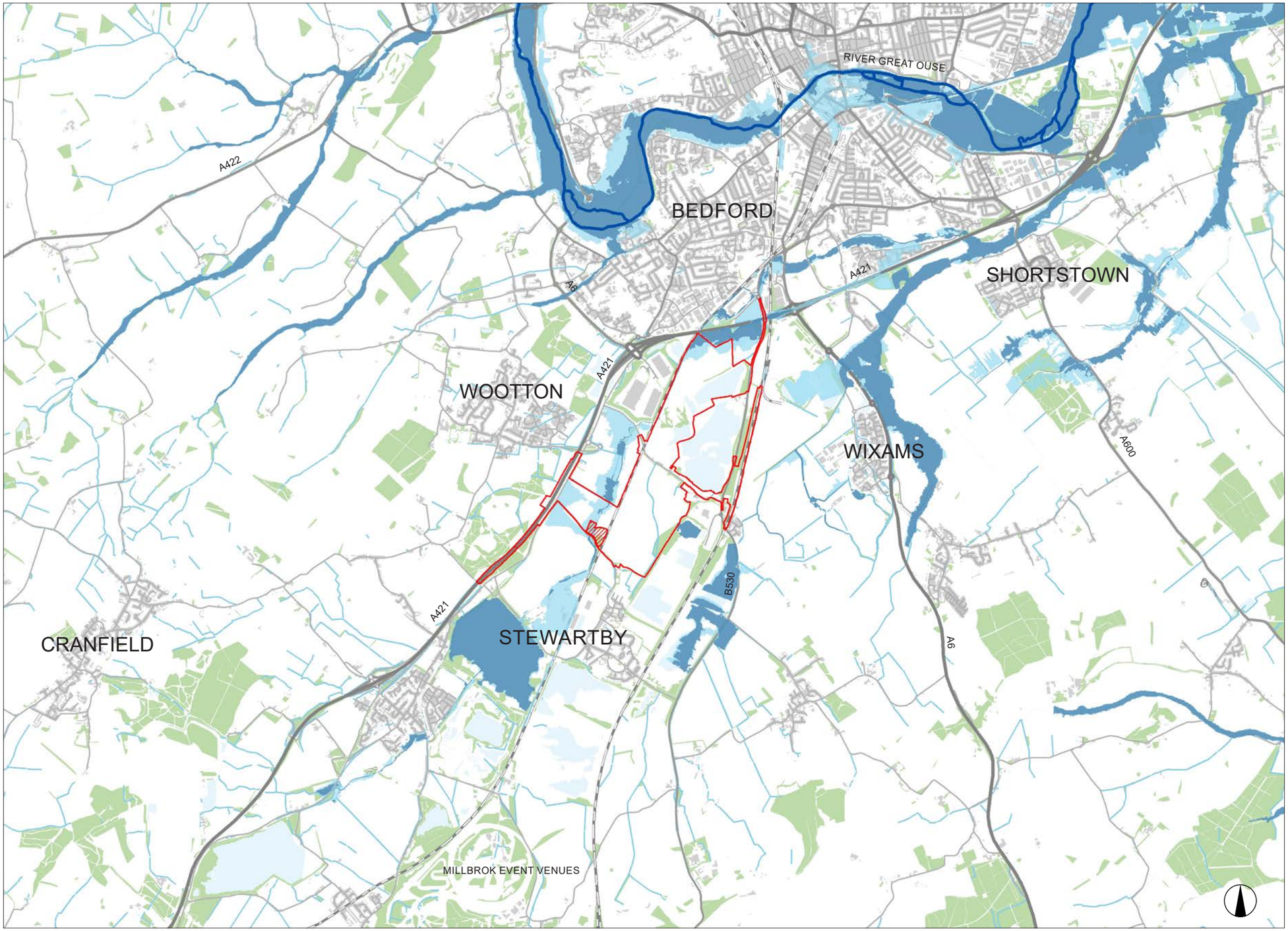
1.4 Nature Based Systems

TREE COVER



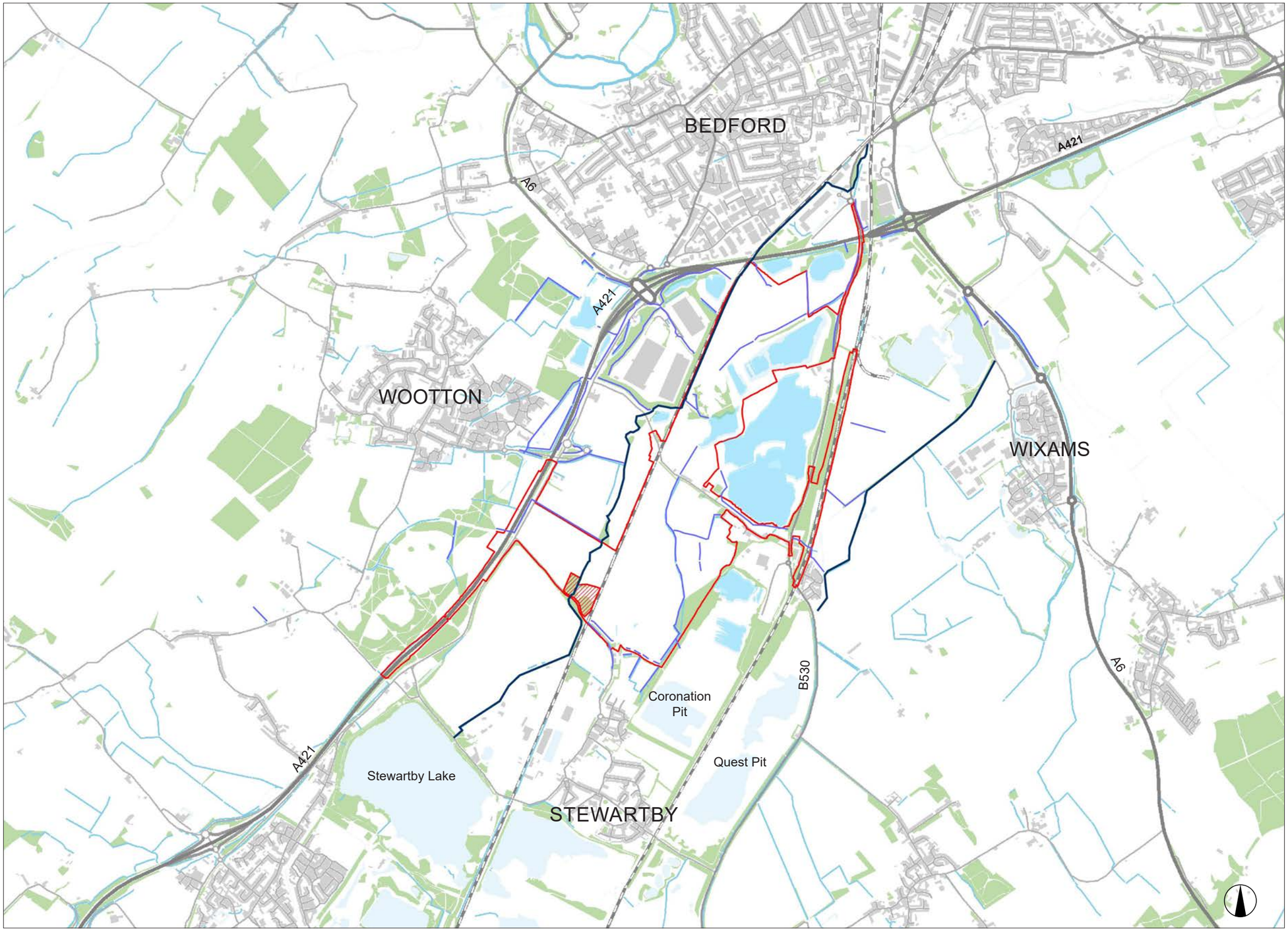
1.4 Nature Based Systems

BLUE INFRASTRUCTURE



1.4 Nature Based Systems

SURFACE WATER REGIME



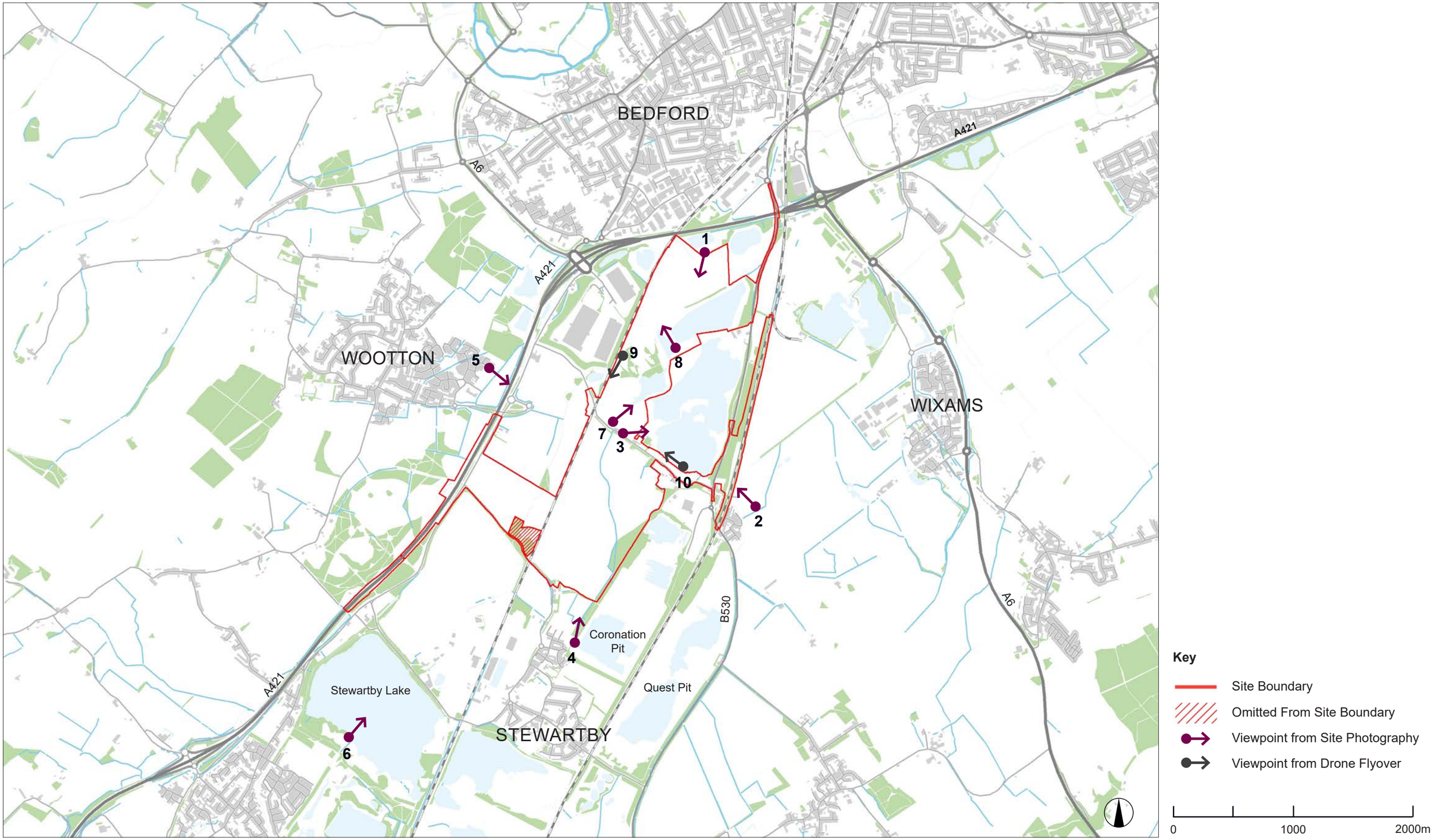
2. Visual Analysis

2.1 Viewpoints Location

2.2 Viewpoints from Site Photography

2.3 Viewpoints from Flyover

2.1 Viewpoints Location



2.2 Viewpoints from Site Photography

VP1 PRoW south of A421 and Interchange Retail Park, Kempston

The northern portion of the site offers expansive views across open fields, framed by distant tree lines and hedgerows associated with the lakes.

Perceptual Factors: Flat landform, arable fields fringed by belts of planting and hedgerows, distant trees; wide open rural views; rare settlements. Simple horizontal forms defined by muted green and brown tones.

Sensory Factors: Expansive characteristics, with extensive views of the sky; tranquil, rural setting with a focus on agricultural use.

VP2 Meadow Road, Kempston Hardwick

The mid-eastern end of the site is strongly defined by the presence of a construction site as well as the existing railway and road infrastructure, with their accompanying linear vegetation features.

Perceptual Factors: A limited view over a wide construction site; traffic in the foreground of the view with construction compounds extending over the majority of local views; linear tree vegetation emerging behind the construction site, adding a sense of depth and layering to the landscape.

Sensory Factors: Noise and clutter associated with the active construction site.

2.2 Viewpoints from Site Photography

VP3 Manor Road, Kempston Hardwick

The central part of the site is mainly characterised by Manor Road and its linear green infrastructure.

Perceptual Factors: Sense of seclusion due to the absence of visual detractors; mature trees and dense shrubs running parallel to the road, which limits views of the wider landscape; pockets of development along the road interrupt the sense of enclosure.

Sensory Factors: Away from the pockets of development there is a sense of isolation, only interrupted by traffic movements.

VP4 Brick Crescent, Stewartby

To the southern boundaries of the site, views north from recent residential development in Stewartby comprise a flat landform, interrupted by belts of planting and pockets of woodland. This allows for long distance views, with awareness of distant buildings and the top of warehousing set within a wooded context.

Perceptual Factors: Strong perception of a transition from residential settlement to open countryside, made more distinctive by the sense of openness to the north.

Sensory Factors: The combination of flat landform and long distance views gives rise to a sense of openness, within which expansive views of the sky are a dominant element.

2.2 Viewpoints from Site Photography

VP5 Wootton Play Park, Wootton

View from the west towards the site, near the residential area in Wootton, which overlooks a local play area and community building, beyond which is the A421, and distant views to a ridgeline to the east.

Perceptual Factors: The vegetation surrounding the play area creates a local screen and softens the appearance of the fence line along the A421. There is a perception of distance between the residents' views and the detracting element of the A421.

Sensory Factors: Cheerful sounds of children playing and laughing at the play area, mixed with the occasional hum of traffic from the A421.

VP6 PRoW 72 (Central Bedfordshire) at Millennium Country Park, Marston Moretaine

Views from the south of Stewartby lake , with the lake itself in the foreground and the outline of Kimberley College, combined with distant belts of woodland form the horizon. The gentle slopes of the restored landfill operations rise gently to the north west.

Perceptual Factors: The absence of visual detractors combined with the calm waters of the lake create a peaceful and tranquil atmosphere, enhancing the overall sense of calm; juxtaposition of the natural beauty of the lake with the structured presence of Kimberley Sixth Form College adds visual interest and depth to the view.

Sensory Factors: Gentle lapping of water against the shore; earthy aroma of the surrounding vegetation.

2.3 Viewpoints from Flyover

VP7 View from Manor Road towards north east

View from Manor Road, demonstrating the derelict nature of the former brick works.

Perceptual Factors: The former brick works now forms a desolate site with scrub reclaiming former footprints of buildings. Derelict buildings and spoil heaps emphasise the historic nature of the site, whilst enclosed by distant tree lines.

Sensory Factors: The hum from the nearby A421 and Manor Road disturbs the otherwise desolate nature of the site.

VP8 View from the Lake Zone towards Kempston

View of the former extraction lakes within the north of the Site. The bodies of water form distinctive man made bodies of water fringed by scrub. The sheds within Marston Vale Distribution Park are visible on the horizon, partially screened by perimeter planting.

Perceptual Factors: Isolated site, with expansive views to the north fo the urban elements. Expansive bodies of water have unnatural outlines empahsising the influence that people have had ont he landscape.

Sensory Factors: The distant hum from the A421 and elements of moving traffic are visible. There is a openness to the landscape and a sense of the derelict nature surrounding the extraction lakes.

2.3 Viewpoints from Flyover

VP9 View east from Sainsburys Tu Distribution Center towards south

Views from Manor Road to the north comprise former developed land fringed by mature vegetation that encloses this area. There is a sense of isolation, achieved through the flat landform and lack of existing vegetation except for at the boundaries.

Perceptual Factors: The formerly developed land has roadways and the outline of former building plots which gives a sense of history and time depth to the area.

Sensory Factors: Noise from passing vehicles to the south and the railway line to the west, contrasts with the otherwise sense of isolation within the site itself.

VP10 Overlooking Manor Rd from east towards northwest

Views of the central section of the site, and Manor Road. The dense roadside vegetation limits views of the wider countryside and lake. Awareness of significant visual detractors from immediately adjacent to the concrete plant.

Perceptual Factors: Expansive fields surrounded by dense vegetation combine with development sites and the nearby lakes to create varied views within which a sense of enclosure along the roads corridor contrasts with the vast and open landscape of the farmed fields and lakes beyond.

Sensory Factors: The combination of noise from the concrete plant and local road contrasts with the sense of openness and tranquillity within the open countryside and lake.

3. Accessible Green Spaces

3.1 Accessible Green Spaces Table

3.1 Accessible Green Space

3.1.1 The Natural England Accessible Green Space (AGS) metric assesses the availability and accessibility of green spaces across England, ensuring that people have access within a 15-minute walk from their homes. It informs policies on public health, biodiversity, and climate resilience. The metric applies the “By All Reasonable Means: Least Restrictive Access to the Outdoors” criteria to promote inclusivity for people with disabilities, considering physical, sensory, and cognitive accessibility. While AGS is designed for publicly accessed open spaces and does not directly apply to the UDX site, relevant criteria can be adapted to create high-quality, inclusive green spaces.

3.1.2 Due to the nature of publicly accessible green space evaluated within the GI Strategy which is largely linear and focused on connectivity of routes that interface with the site, many of the AGS criteria are not relevant.

3.1.3 The tables below highlights the all the indicators outlined in the By All Reasonable Means Quality Criteria.

3.2 Accessible Green Spaces Table

ACCESS CHAIN - VISITOR EXPERIENCE	INDICATORS OF GOOD PRACTICE		APPLICABLE? Y/N	HOW DOES THE PROPOSED DEVELOPMENT MEET THE CRITERIA?
1. DECISION TO VISIT	Information welcomes all visitors	Websites and leaflets show a wide range of visitors, stories and activities.	N	The Lakes area is a privately owned green space, and this information is not available separately. However, visitors will find relevant details on Universal's Theme Park website/leaflets.
		Information is designed to principles of inclusive design and Cymraeg Clir/ Plain English	N	The Lakes area is a privately own green space. This information won't be provided.
		Local groups have been involved in the development of new information.	N	The Lakes area is a privately own green space. This information won't be provided.
		Information is shared widely with local community groups and networks and invites people to get involved in addressing accessibility.	N	The Lakes area is a privately own green space. This information won't be provided.
		Information is checked regularly to ensure it is kept up to date.	N	The Lakes area is a privately own green space. This information won't be provided.
		Videos are captioned for the benefit of people with hearing impairments.	N	The Lakes area is a privately own green space. This information won't be provided.
	Information is accessible	Website is designed in line with Web Accessibility Initiative standards and user-tested with people with different sensory and intellectual disabilities.	N	The Lakes area is a privately owned green space, and this information is not available separately. However, visitors will find relevant details on Universal's Theme Park website.
		Off-site information is in different formats to allow a wider audience to access it. Eg, printed information is available in large print, audio and Braille for people with visual impairments (available from the Customer Enquiry Team).	N	The Lakes area is a privately own green space. This information won't be provided.
		Symbols and pictures support people and people with learning disabilities and help convey messages to visitors without English as first language.	N	The Lakes area is a privately owned green space, and this information is not available separately. However, visitors will find relevant details on Universal's Theme Park website/leaflets.
		Off-site information is in languages that reflect local community and tourism needs.	N	The Lakes area is a privately owned green space, and this information is not available separately. However, visitors will find relevant details on Universal's Theme Park website/leaflets.
	There is information about site accessibility	Off-site information provides information on the accessibility of site facilities, accessible routes on site, accessible parking, forthcoming events, opening times of facilities and travel options.	Y	The Lakes area is a privately owned green space, and this information is not available separately. However, visitors will find relevant details on Universal's Theme Park website.
		Policies are clear about free entry for carers and personal assistants, seniors, low income.	N	The Lakes area is a privately own green space. This doesn't apply.
	Information is easy to find	Community venues, groups and networks are actively sharing information with new audiences.	N	These facilites are not provided.

3.2 Accessible Green Spaces Table

ACCESS CHAIN - VISITOR EXPERIENCE	INDICATORS OF GOOD PRACTICE		APPLICABLE? Y/N	HOW DOES THE PROPOSED DEVELOPMENT MEET THE CRITERIA?
1. DECISION TO VISIT	There is virtual access to experiences that are too challenging to get to	People can gain a virtual experience (eg of a remote cave, or a steep hill fort) through video, webcam, audio, images etc.	N	The Lakes area is a privately own green space. This won't be provided.
	There is a policy for developing inclusive information	An information policy is regularly reviewed to ensure that all new information takes on board highest standards of inclusive design.	N	The Lakes area is a privately own green space. This doesn't apply.
2. JOURNEY AND ARRIVAL	It is possible to reach the route or site by public transport	Explore scope to work with local transport providers to improve services, including community transport schemes.	N	The Lakes area is a privately own green space. This doesn't apply.
		Transport options are available on site (as well as in off-site information).	Y	The Lakes area is a privately owned green space with no dedicated transport options. However, the broader site offers various transport options, including train stations and bus stops.
		Wheelchair accessible bus and taxi services are available.	N	The Lakes area is a privately own green space. This doesn't apply.
		Reduced price and alternative route options have been agreed with local transport providers.	N	The Lakes area is a privately own green space. This doesn't apply.
	Walking and cycling are supported	There are good routes for walking or cycling to site	Y	The wider site features walking and cycling paths that connect to the broader network and the Lakes area. Walking routes are available within the Lakes area, while cycling is discouraged due to the planned habitat mitigation planting
		Accessible cycling opportunities are available.	Y	Cycling routes are provided outisde the Lakes area with cycling stands provided by entrances.

3.2 Accessible Green Spaces Table

ACCESS CHAIN - VISITOR EXPERIENCE	INDICATORS OF GOOD PRACTICE		APPLICABLE? Y/N	HOW DOES THE PROPOSED DEVELOPMENT MEET THE CRITERIA?
2. JOURNEY AND ARRIVAL	Walking and cycling are supported	Accessible showers, lockers and cycle storage provided on site.	N	These facilites are not provided.
	Accessible car parking and drop-off are clearly identified	Accessible parking is clearly signed from approach roads and located near to entrances and key highlights (eg café).	N	Parking is not available for the Lakes area exclusiely; however, ample parking will be provided within the broader site.
		At least 5% of spaces are designed and designated for disabled visitors.	N	Parking is not available for the Lakes area exclusiely; however, ample parking will be provided within the broader site.
		Electric charging points are accessible to wheelchair users.	N	Parking is not available for the Lakes area exclusiely; however, ample parking will be provided within the broader site.
		Drop-offs for public and private transport are accessible, near the entrance, and on the same side of the road to avoid having to cross traffic.	N	Parking is not available for the Lakes area exclusiely; however, ample parking will be provided within the broader site.
	Entrances are welcoming and clearly signed	Arrival points have good visitor information, such as an accessible map and wayfinding details.	Y	Landscape and means of access details to be provided in the compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
		Facilities like cafes, visitor centres and toilets are accessible and easy to find.	N	These facilites are not available for the Lakes area; however, toilets will be provided within the broader site.
		Entrances are shared by different visitors (ie not separate for wheelchair users).	Y	Landscape and means of access details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.

3.2 Accessible Green Spaces Table

ACCESS CHAIN - VISITOR EXPERIENCE	INDICATORS OF GOOD PRACTICE		APPLICABLE? Y/N	HOW DOES THE PROPOSED DEVELOPMENT MEET THE CRITERIA?
2. JOURNEY AND ARRIVAL	Choice of visitor experiences are clearly highlighted	Visitor information is available to show people what experiences are on offer so they can choose what best suits them.	Y	Landscape and means of access details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
	Portable equipment is available	Equipment such as wheelchairs, portable seats, puncture-repair kits and audio materials are available for loan.	N	These facilites are not provided.
	Remote and challenging visitor experiences are reflected in the visitor/ learning centre or cafe	People can link to more remote and challenging experiences, eg video footage, audio material, webcam of bird nest.	N	These facilites are not provided.
		Materials are available to explore through touch – eg a touch table with interesting objects and materials.	N	These facilites are not provided.
	Staff and volunteers provide good support	Staff and volunteers are trained in diversity awareness.	N	The Lakes area is a privately own green space. This does not apply.
3. ON-SITE EXPERIENCE: FACILITIES	**Toilets cater for all visitors**	There are accessible toilets near entrances, car parks and starting points.	N	These facilites are not available for the Lakes area; however, toilets will be provided within the broader site.
		Toilets are highlighted in access information and include details of accessibility.	N	These facilites are not available for the Lakes area; however, toilets will be provided within the broader site.
	Facilities such as visitor centres, cafes, ticket sales, bird hides are accessible	Opening times are convenient for different people.	N	These facilites are not provided.
		Accessibility is promoted in visitor information.	N	These facilites are not provided.
		Staff have undertaken diversity awareness training.	N	These facilites are not provided.

3.2 Accessible Green Spaces Table

ACCESS CHAIN - VISITOR EXPERIENCE	INDICATORS OF GOOD PRACTICE		APPLICABLE? Y/N	HOW DOES THE PROPOSED DEVELOPMENT MEET THE CRITERIA?
3. ON-SITE EXPERIENCE: FACILITIES	**Good provision of seating and shelter**	There are frequent opportunities for visitors to rest along routes.	Y	Landscape and means of access details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
		Seating is prioritised alongside more challenging gradients and surfaces.	Y	Landscape details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
		Shelter is available, particularly in places where visitors are likely to linger (eg pickup points).	Y	Landscape and means of access details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
	Diverse range of activities and events	Community activities are supported, eg the local LGBT walking group now uses the site as a venue.	N	The Lakes area is open to the public but not offering planned events.
		Activity plans take account of diverse interests.	N	The Lakes area is open to the public but not offering planned events.
	Event spaces cater for all visitors	There are accessible toilets nearby, car parks or drop-off and plenty of seating.	N	These facilites are not available for the Lakes area; however, toilets will be provided within the broader site. Further details to be provided in the compliance plan.
		There is step-free access to event/activity spaces, including performance spaces.	N	These facilites are not provided.
	Diverse range of food and drink on offer	Food offer takes account of most common food intolerances (eg gluten) as well as dietary options such as meat-free.	N	These facilites are not provided.
	Diverse range of food and drink on offer	Specific diets and intolerances can be catered for by arrangement.	N	These facilites are not provided.
	Alternative languages are available	Interpreters can be booked. Sign Language is planned for large-scale events.	N	These facilites are not provided.

3.2 Accessible Green Spaces Table

ACCESS CHAIN - VISITOR EXPERIENCE	INDICATORS OF GOOD PRACTICE		APPLICABLE? Y/N	HOW DOES THE PROPOSED DEVELOPMENT MEET THE CRITERIA?
3. ON-SITE EXPERIENCE: GETTING AROUND	**Toilets cater for all visitors**	There are accessible toilets near entrances, car parks and starting points.	N	These facilites are not available for the Lakes area; however, toilets will be provided within the broader site. Further details to be provided in the compliance plan.
		Toilets are highlighted in access information and include details of accessibility.	N	These facilites are not available for the Lakes area; however, toilets will be provided within the broader site. Further details to be provided in the compliance plan.
	There is regular review of accessibility and positive response to issues raised	Disabled visitors are involved in regular access reviews	N	The Lakes area is a privately own green space. This does not apply.
		There is a clear process for reporting and responding to accessibility issues.	N	The Lakes area is a privately own green space. This does not apply.
	Regular and high quality maintenance	There is regular repair to surfaces, cutting back overhanging vegetation, removing obstacles.	Y	As part of its duty of care as the landowner, UDX is responsible for maintaining and repairing the Lake area and permissive route.
	Regular and high quality maintenance	Maintenance team are trained in diversity awareness.	Y	As part of its duty of care as the landowner, UDX is responsible for maintaining and repairing the Lake area and permissive route.
	Choice of routes in terms of distance, challenge and visitor experience	Short return routes are included as easier options for visitors with limited mobility or stamina.	Y	Landscape and means of access details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
	Good wayfinding	There is good information at key decision points so people can find their way around.	Y	Landscape and means of access details to be provided in the compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
	Seating	Regular seating provides resting points, particularly to reduce impact of gradients and distances.	Y	Landscape details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.

3.2 Accessible Green Spaces Table

ACCESS CHAIN - VISITOR EXPERIENCE	INDICATORS OF GOOD PRACTICE		APPLICABLE? Y/N	HOW DOES THE PROPOSED DEVELOPMENT MEET THE CRITERIA?
3. ON-SITE EXPERIENCE: INFORMATION AND INTERPRETATION	**Key information is accessible to all visitors**	Information is designed to principles of inclusive design and Cymraeg Clir/ Plain English.	Y	Landscape details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
		Information uses appropriate terminology and promotes diversity through the range of people portrayed and the issues highlighted, eg gender-neutral toilets, Changing Places facility, visitor guides in different languages.	Y	Landscape details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
		Symbols and pictures accompany text.	Y	Landscape details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
		Hearing loops are installed in visitor centres, and portable ones used by guides and educators.	N	These facilites are not provided.
	Alternative formats are available	Information is available in alternative formats to text such as Braille, Large Print, audio and Widgit symbols (available from the Customer Enquiry Team).	Y	Landscape details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
		Interpretation in other formats beyond text, including tactile.	Y	Landscape details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
	"There is an Access Guide"	An Access Guide contains key details about the accessibility of a site, or collection of sites.	N	The Lakes area is a privately own green space. This is not provided.
	Information is well positioned	On-site information, such as display boards, are at a height and angle where they can be accessed by children, wheelchair users and people of short stature	Y	Landscape details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
		Leaflets and other portable information is in accessible locations, eg counters reachable by wheelchair users.	N	The Lakes area is a privately own green space. This is not provided.
		Leaflets contain a map with indications of distances, gradients, position of seats and any obstacles or hazards. Symbols, names of features and other information should be mirrored in the site's signage. A clearly designed leaflet with good information could reduce the need for signage.	N	The Lakes area is a privately own green space. This is not provided.

3.2 Accessible Green Spaces Table

ACCESS CHAIN - VISITOR EXPERIENCE	INDICATORS OF GOOD PRACTICE		APPLICABLE? Y/N	HOW DOES THE PROPOSED DEVELOPMENT MEET THE CRITERIA?
3. ON-SITE EXPERIENCE: INFORMATION AND INTERPRETATION	**Good wayfinding**	There is good information at key decision points so people can find their way around.	Y	Landscape and means of access details to be provided in the compliance plan submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
	Guided tours are accessible	Basic British Sign Language and hearing loops are available for guided tours.	N	The Lakes area is a privately own green space. This is not provided.
4. RETURN HOME	**Exits are clearly signed and easy to use**	Exit points are clearly marked on maps and visitor information, and well signed on site.	Y	On site information to be provided in te compliance plan. Off-site information is not available separately; however, visitors will find relevant details on Universal's Theme Park website.
		Facilities like cafes, visitor centres and toilets are accessible and easy to find.	N	These facilites are not available for the Lakes area; however, toilets will be provided within the broader site. Further details to be provided in the compliance plan.
		Exits are shared by different visitors (ie not separate for wheelchair users).	Y	Landscape and means of access details to be provided in compliance plans submitted for approval for zones and sub-zones through the post-decision approval process explained in Section 10.0 of the DAS.
	Exits are within easy reach of parking and public transport	Accessible parking is located close to exit points.	N	Parking is not available for the Lakes area exclusiely; however, ample parking will be provided within the broader site.
		Public transport and pick-up points are within easy reach of exits.	Y	The Lakes area is a privately owned green space with no dedicated transport options. However, the broader site offers various transport options, including train stations and bus stops.
	Good provision of seating and shelter	Seating and shelter are provided at pick-up points and other places where visitors are likely to wait.	N	The Lakes area is a privately own green space. This is not provided.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