UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT

Former Kempston Hardwick Brickworks and adjoining land, Bedford

Sustainability Statement

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1 INTRODUCTION

1.1.1. This Sustainability Statement has been prepared on behalf of Universal Destinations and Experiences (UDX), who 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 Ministry of Housing, Communities and Local Government ("MHCLG") to consult on and consider making a planning decision.

1.1.2. 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 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.

1.1.3. 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.

1.1.4. It also safeguards land for a potential new railway station on the proposed East West Rail (EWR) Bletchley to Bedford line, should this come forward in the future.

1.1.5. Capitalised terms that are not defined within this document shall have the same meaning as set out in **Appendix 0.1: Glossary and Acronyms (Volume 3)** of the Environmental Statement (ES) (**Document Reference 4.0.1.0**).

1.1.6. This Sustainability Statement outlines the sustainability measures planned for construction of the Proposed Development, taking into account national and local policy requirements. The Sustainability Statement intends to provide information confirming that the Proposed Development will be designed to a certifiable level of environmental responsibility. Sustainability themes to be addressed are identified in line with the outline level of design for the Proposed Development at this stage, allowing scope to develop appropriate options for improving sustainability during the detailed design phase.

1.1.7. UDX intends to use suitable frameworks for embedding sustainability in the Construction Phase and Operational Phase. This will mean attaining of Leadership in Energy and Environmental Design (LEED) Gold Certification for Cities and Communities[1] as applied to the entire Proposed Development and LEED Building Design and Construction[2] for specific flagship buildings (as set out in the **Environmental Controls Document** (**Document Reference 6.16.0**). These sustainable design practices will therefore apply for all the applicable components of the Proposed Development for which UDX is the relevant Undertaker[3]. The following LEED categories form the basis for identifying sustainability measures relevant to the Proposed Development:

- Integrated Process;
- Natural Systems and Ecology;
- Transportation and Land Use;
- Water Efficiency;
- Energy and Greenhouse Gas Emissions;
- Material and Resources;
- Quality of Life;
- Regional Priority; and
- Innovation.

1.1.8. Additionally, the following relevant Undertakers have sustainability strategies in place that will be applied to the aspects of the Proposed Development for which they are responsible.

1.1.9. For National Highways this includes:

- The National Highways Environmental Sustainability Strategy4, which focuses on enhancing climate resilience, biodiversity, and community wellbeing through holistic land management, pollution reduction and innovative solutions;
- Key commitments from National Highways include achieving net zero emissions across its own operations by 2030, achieving net zero for maintenance and construction by 2040, and enabling net zero for road user emissions by 2050, while supporting local communities and preserving natural and cultural heritage; and
- National Highways are also the first road organisation in the world to achieve the PAS2080 accreditation, a global standard for managing carbon in infrastructure.

[1] U.S. Green Building Council (2024) *Guide to LEED Certification: Cities and Communities.* https://www.usgbc.org/tools/leed-certification/cities-communities [Accessed: 19 May 2025].

[2] U.S. Green Building Council (2024) *LEED for Building Design and Construction.* https://www.usgbc.org/leed/rating-systems/new-buildings [Accessed: 19 May 2025].

[3]The persons (corporate or otherwise) who are permitted to carry out the Proposed Development (including their contractors and other persons appointed by them in connection with the carrying out of the Proposed Development).

[4] National Highways (2023) *National Highways Environmental Sustainability Statement.* Environmental Sustainability Strategy - National Highways. [Accessed: 19 May 2025].

1.1.10. For Network Rail this includes:

- The Network Rail Sustainability Strategy5, presenting its vision to provide the cleanest, greenest mass transport system, focusing on low emissions, climate resilience, biodiversity, and minimal waste;
- Network Rail aims to achieve net zero carbon emissions by 2050 for its operations in England and Wales (2045 in Scotland), improve air quality, and enhance biodiversity while integrating environmental sustainability into all aspects of its operations; and
- Additionally, BREEAM and/or CEEQUAL assessment and predicted performance will be commissioned during the delivery of the projects commissioned by Network Rail.

[5] Network Rail (2020) *Environmental Sustainability Strategy*. Environmental sustainability strategy 2020-2050 (networkrail.co.uk) [Accessed: 15 May 2025].

2 FOUNDATION FOR ACTION ON SUSTAINABILITY

2.1.1. This Sustainability 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.

2.2 NATIONAL PLANNING POLICY

2.2.1. National Planning Policy Framework (NPPF) 2024[6] - The NPPF sets out the UK Government's planning policies and framework for development in a sustainable manner in England. In summary, this means that planned buildings, commercial development and associated infrastructure must:

- Support the national planning objectives across social, environmental, and economic themes; and
- Accord with local plans and planning requirements for sustainable development, as specific to the area in which they are to be delivered.

2.2.2. Heat and Buildings Strategy 2021[7] - This strategy sheds light on government's approach to low-carbon heating and energy efficiency as part of the Clean Growth Strategy and the Ten Point Plan, ensuring a consistent and coherent approach across various supply chain markets, buildings and occupancy types, and that the government has robust plans in place with targeted financial supports to achieve carbon budgets and lay the foundations for Net Zero buildings in the UK by 2050.The strategy sets out the vision for Large and complex commercial and industrial buildings on the pathway to be Net-Zero, which identified a policy to develop and consult on a mandatory framework for performance-based energy ratings for commercial and industrial building over 1,000 m^2.

2.3 LOCAL PLANNING POLICY

2.3.1. Bedford Borough Local Plan 2030[8] - The Local Plan Strategy depicts the policies to meet the growth needs of Bedford Borough up to 2030. The Local Plan 2030 aims to strike a balance between promoting economic growth, meeting housing needs, protecting the environment, and enhancing the overall quality of life for residents in the Bedford area. This Local Plan identifies a series of objectives including the need to:

- "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."
- "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."

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6 Ministry of Housing, Communities and Local Government (2024) *National Planning Policy Framework (NPPF)*. Available at: National Planning Policy Framework - GOV.UK [Accessed: 22 May 2025].

7 Department for Energy Security and Net Zero and Department for Business, Energy & Industrial Strategy (2021) *Heat and Buildings Strategy*. Available at: https://www.gov.uk/government/publications/heat-and-buildings-strategy [Accessed: 22 May 2025].

8 Bedford Borough Council (2020) *Bedford Borough Local Plan 2030*. Available at: https://www.bedford.gov.uk/planning-and-building-control/planning-policy/local-plan-2030/local-plan-2030-overview [Accessed: 22 May 2025].

- "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."
- "Protect and enhance our natural resources including air, soil minerals and water to minimise the impacts of flooding, climate change and pollution."

2.4 LEADERSHIP IN ENERGY AND ENVIRONMENTAL DESIGN (LEED)

2.4.1. LEED provides a comprehensive green building certification program (similar to the UK BREEAM certification process), requiring developments to meet specific criteria and targets to improve sustainability and reduce environmental impacts. UDX is experienced in applying LEED requirements to development of resort locations worldwide with Universal Beijing Resort being the world's first theme park resort to earn a LEED Gold certification for Cities and Communities[9] and will target the same rigorous approach for the Theme Park aspects of the Proposed Development, with a focus on the following areas:

- Site – Selecting sites with access to public transit and amenities and develop sites with minimal impact to local ecosystems;
- Water – Conserving freshwater resources through reduction and recycling of non-potable water.
- Energy – Reducing emissions, improving efficiency, and shifting to clean energy;
- Materials – Prioritising circular, low-carbon, and healthy materials;
- Waste – Strive to limit waste in facility construction and operations; and
- Health and Wellbeing – Create healthy, vibrant spaces that promote wellbeing.

2.4.2. Additionally, UDX's own internal **Design Standards (Document Reference: 6.3.0)** for sustainability will be applied to the Proposed Development, consistent with the themes covered by the LEED framework.

2.4.3. Based on a review of national and local policy requirements for sustainable development the aspects covered by LEED criteria are considered to be aligned with these policies.

[9] Universal Beijing Resort (2021) *Universal Beijing Resort becomes world's first theme park resort destination to ear prestigious LEED certification for communities.* Available at: https://www.universalbeijingresort.com/en/news/235.html [Accessed: 22 May 2025].

3 KEY THEMES

3.1.1. This section of the Sustainability Statement provides information on how the preliminary design of the Proposed Development has responded proportionately to the relevant core key themes and LEED certification criteria for Cities and Communities. Due to the character of the Proposed Development, certain criteria identified under the LEED certification themes would not be applicable, particularly those that refer to residential or other use-types that would not be present (e.g. education facilities, etc.).

3.1.2. It should be noted that no modelling or data analysis has been undertaken for this work and the Sustainability Statement is proportionate to the level of information available for the design of the Proposed Development at this stage.

Integrative Process

- ✓ Integrative Planning and Design Process

3.1.3. **Integrative Planning and Design Process:** Sustainability and designing an inclusive space for people to enjoy is at the forefront of decision-making and a driver in the creative vision for the Proposed Development. The Proposed Development will be designed to minimise environmental impact, enhance the surrounding area and community, create jobs, and provide an extraordinary experience for visitors. UDX's internal standards for sustainability in new developments will be applied in the design of the Proposed Development.

Natural Systems and Ecology

- ✓ Ecosystem Assessment
- ✓ Construction Activity Pollution Prevention
- ✓ Green Spaces
- ✓ Natural Resources Conservation and Restoration
- ✓ Light Pollution Reduction
- ✓ Resilience Planning

3.1.4. **Ecosystem Assessment:** As part of the planning proposal, information provided within **Chapter 6: Ecology and Nature Conservation (Volume 1)** and associated appendices of the ES cover this Ecosystems Assessment. This term is used in the LEED rating system, covering relevant topics, such as topography, soils, terrestrial vegetation and habitat, hydrology and aquatic ecosystems and pollution sources and threats.

3.1.5. **Construction Activity Pollution Prevention:** The Proposed Development will reduce pollution from construction activities by controlling soil erosion, waterway sedimentation, and airborne dust through implementation of the control measures contained in **Appendix 2.3: Outline Construction Environmental Management Plan (OCEMP) (Volume 3)** of the ES **(Document Reference 4.2.3.0)**. Any site-specific CEMP must be in conformance with **Appendix 2.3: OCEMP (Volume3)** of the ES **(Document Reference 4.2.3.0)** and will, among other requirements, implement an erosion and sedimentation control plan for all construction activities, including but not limited to construction of roads and highways, transit systems, water and wastewater systems, energy systems, waste management systems, and buildings to be undertaken by the relevant constructing parties.

3.1.6. **Green and Blue Spaces:** The Proposed Development provides a network of green and blue spaces (some of which will be open to the public) that will total at least 15% of the Site as required by the LEED Green Spaces prerequisite and will create an active environment designed to positively impact the physical, mental, and psychological health and well-being of the community while also enhancing the environmental quality.

3.1.7. **Natural Resources Conservation and Restoration:** The ES presents an assessment of potentially significant effects of the Proposed Development upon identified important ecological features and natural resources and the approved documents associated with this assessment the **Appendix 6.4: Outline Habitat Creation and Enhancement Plan** (**Volume 3**) of the ES **(Document Reference 4.6.4.0)** and supporting figure, the **Appendix 6.5: Outline Landscape and Ecology Management Plan** (**Volume 3**) of the ES **(Document Reference 4.6.5.0)**, and the **Appendix 12.3: Drainage Strategy** (**Volume 3**) of the ES **(Document Reference 4.12.3)** include commitments for mitigation, where practicable, to protect and enhance biodiversity and habitats.

3.1.8. **Light Pollution Reduction: Design Standards(Document Reference 6.3.0)** Section 4.0: Appearance - Lighting for lighting developed for the Proposed Development identify that lighting will be consistent with delivering a well-designed, high quality new urban environment that is mindful of light spill and light sensitive fauna and flora.

3.1.9. **Resilience Planning:** UDX is committed to creating a strong community resilient against climate change risks as well as natural and man-made hazards. The **Design Standards (Document Reference 6.3.0)** Section 4.0: Appearance - Climate Resilience for the Proposed Development covering Sustainability, Carbon and Environmental Management evidence this commitment.

Transportation and Land Use

- ✓ Compact, Mixed Use, and Transit Oriented Development
- ✓ Walkability and Bikeability
- ✓ Access to Quality Transit
- ✓ Clean Transportation

3.1.10. **Compact, Mixed Use, and Transit Oriented Development:** The Proposed Development will feature an entertainment resort complex as described in **Chapter 2: Description of the Proposed Development (Volume 1)** of the ES **(Document Reference 2.2.0)**.

3.1.11. **Walkability and Bikeability:** The Proposed Development will deliver a high level of connectivity via walking, biking, bus, and taxi to facilitate mobility. Pedestrian and cycle routes are also proposed within the Site to further encourage active travel by visitors and staff.

3.1.12. **Access to Quality Transit:** In addition to the active travel network described above, the Proposed Development includes the expansion of Wixams Station, with a commitment for bus connectivity to the Site, and safeguarding of land for a new rail station, all of which encourage the use of public transport for access to the Site.

3.1.13. **Clean Transportation:** UDX is committed to reducing pollution by supporting the transition to electricity, and alternative fuels as a means of powering vehicles and will maximise the use of the lowest carbon emitting fleet for operational tasks whenever possible to reduce emissions, noise and operating costs while providing an efficient transportation method for visitor transfers and employees. Additionally, there will also be provision for EV charging availability in parking areas as set out in **Appendix 2.1**: **Environmental Statement Basis of Assessment (Volume 3)** of the ES **(Document Reference 4.2.1.0)**.

Water Efficiency

- ✓ Integrated Water Management
- ✓ Water Access and Quality
- ✓ Stormwater Management
- ✓ Wastewater Management
- ✓ Smart Water Systems

3.1.14. **Integrated Water Management and Water Access and Quality: Chapter 12: Water Resources (Volume 1)** of the ES **(Document Reference 2.12.0)** for the Proposed Development contains a full assessment on water resources, including water availability, demand and supply. There is also a Water Strategy for the Site provided in **Appendix 12.2: Water Strategy (Volume 3)** of the ES **(Document Reference 4.12.2.0)** that establishes a water balance baseline and investigates the opportunities to implement water conservation measures, with a focus on water reuse and recycling interventions to minimise the Site's water footprint. To reduce demand on water resources it is intended that sources of non-potable are considered for use in the Proposed Development, including through the potential use of rainwater capture collection facilities and alternative water sources. This water will be treated through a treatment facility prior to use at the Site.

3.1.15. **Stormwater Management:** The ES for the Proposed Development contains a full assessment of flood risk, drainage and stormwater management in an effort to prevent erosion and reduce runoff volume, pollution, siltation, and sedimentation while recharging groundwater and providing green and blue infrastructure. The ES also includes a Drainage Strategy for the Site provided in **Appendix 12.3: Drainage Strategy (Volume 3)** of the ES **(Document Reference 4.12.30)**. To manage stormwater runoff, stormwater ponds and/or underground storage will be provided with associated structures. The surface water strategy will be devised to attenuate post-development flows to greenfield rates based on a cautious worst case[10] scenario with maximum impermeability factors for each Zone.

3.1.16. **Wastewater Management:** The Water Strategy **(Document Reference 4.12.2.0)** for the Site also addresses the baseline foul water discharge, infrastructure constraints and opportunities for conservation and reuse.

[10] Where the phrase cautious worst case is used it means "*a cautious worst case that provides a robust assessment of likely significant effects*."

3.1.17. **Smart Water Systems:** UDX intends to manage water efficiently by tracking consumption, losses, leakages, theft and reduce wastage of water through smart solutions such as smart water meters or other similar water supply system measures.

Energy and Greenhouse Gas Emissions

- ✓ Power Access, Reliability and Resiliency
- ✓ Energy and Greenhouse Gas Emissions Management
- ✓ Energy Efficiency
- ✓ Grid Harmonisation

3.1.18. An initial **Energy Statement (Document Reference 6.9.0)** has been developed identifying plans in place to ensure the demand capacity for the Proposed Development will be available and providing an optioneering assessment for improving energy efficiency and the provision of low carbon power supplies, to be considered further during the detailed design stage. UDX will use a low carbon energy centre including advanced energy-efficient systems to optimise energy performance and ensure thermal comfort via smart design strategies such as heat-pumps for heating and cooling generation, electric boilers, a high efficiency chilled water plant, and/or heating and cooling thermal stores. There may be future opportunities to utilise heat from 'recoverable' heat sources - such as surplus heat from industrial processes or energy-from-waste plants. The ES for the planning proposal includes a Greenhouse Gas (GHG) assessment, which provides a preliminary estimate of embedded and operational GHG emissions attributable to the Proposed Development, which will be developed further to provide a baseline metric for GHG emissions during the detailed design stage.

Material and Resources

- ✓ Construction and Demolition Waste Management
- ✓ Solid Waste Management
- ✓ Organic Waste Treatment
- ✓ Recycling Infrastructure
- ✓ Smart Waste Management Systems

3.1.19. UDX is committed to promoting sustainable infrastructure through appropriate waste collection and management systems in and around the Proposed Development to minimise the generation of all waste types during construction and operation while maximizing the potential for recycling. The design of the Proposed Development will prioritise the use of circular, low-carbon materials to extend the life of material resources and reduce waste generation. The Proposed Development is built on the foundation of responsible sourcing, ensuring rigorous environmental and social standards, promoting transparency and accountability throughout the supply chain to minimise the environmental impact of the infrastructure.

Quality of Life

- ✓ Demographic Assessment
- ✓ Social Infrastructure
- ✓ Public Health and Wellbeing
- ✓ Emergency Management and Response

3.1.20. The ES for the Proposed Development includes **Chapter 13: Socio-economics (Volume 1)** of the ES (**Document Reference 2.13.0**) and **Chapter 17: Population and Human Health (Volume 1)** of the ES **(Document Reference 2.17.0**), which contain a demographic assessment and a social infrastructure baseline, comparable to what would also be required for LEED certification. The Proposed Development will offer facilities and services to meet the daily social needs of employees and guests to enhance overall community development. The Proposed Development for the Site, including the Theme Park, Ecological Enhancement Areas, active travel and mixed-use areas will offer amenities to further an "active lifestyle" for the community, guests and employees working on the Site, promoting public health and wellbeing.

3.1.21. **Emergency Management and Response:** The Proposed Development will be designed to address foreseen security and safety provisions on the Site for the public. This is evidenced by the **Security and Emergency Management Plan (Document Reference 6.4.2.0)** that is included as part of the planning proposal.

4 CONCLUSIONS

4.1.1. The information provided in this Sustainability Statement supports the planning proposal submitted by UDX for the Proposed Development; it outlines plans for delivering sustainable outcomes through design work for the Site.

4.1.2. Building on a review of national and local policy requirements for sustainable development, UDX's intention to apply measures in line with the key sustainability themes in the LEED framework demonstrates that a range of proportionate steps to achieving sustainable outcomes across the Proposed Development lifecycle have been considered and will continue to be pursued as more detailed design is completed.

4.1.3. Any further refinement of the design and delivery of the Proposed Development is expected to progress consistent with the intent set out in this Sustainability Statement. Evidence of outcomes achieved in this context will remain valuable in demonstrating a full response to local planning policy requirements for sustainability and sound, responsible design.

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