



UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT

Former Kempston Hardwick Brickworks
and adjoining land, Bedford

Planning Statement

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EXECUTIVE SUMMARY

Introduction and Purpose

This Planning Statement has been prepared on behalf of Universal Destinations & Experiences (UDX) (“the Promoter”, or “UDX”) 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.

There is no statutory requirement for a planning proposal made direct to MHCLG to be determined in accordance with the Development Plan (as there is for planning applications under Sections 62A and 70(2) of the TCPA 1990) or in accordance with any relevant National Policy Statement (NPS, as there is for Nationally Significant Infrastructure Projects). However, despite the Development Plan having no statutory basis in the determination of the planning proposal, as a general principle national and local planning policy are still material considerations for the Secretary of State to consider when deciding whether or not to make a planning decision, alongside other important material considerations. It is therefore still appropriate and necessary to consider the extent to which the uses and development permitted by any planning permission granted would comply with relevant national and local planning policies. This Planning Statement is therefore provided for information purposes to address that aim.

Table 1 and Table 2 provides a list of acronyms and defined terms applied across this Planning Statement.

The Planning Proposal

The planning proposal is seeking approval for development of a Site 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 Entertainment Resort Complex (ERC) lying within parts of 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.

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.

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.

The planning proposal includes the redevelopment of a brownfield site that was previously a former industrial brickworks facility. This redevelopment will include the transformation of former clay quarry pits into strategic surface water management facilities and enhanced habitat areas.

Unified Control

UDX will be the master developer, with National Highways constructing the A421 slip roads and Network Rail building Wixams Rail Station and carrying out works to the Manor Road level crossing.

DUDX will exercise appropriate oversight over all aspects of the ERC, including initial planning and design, coordination of the infrastructure, construction and setting the framework for the long-term management of the ERC.

This unified control approach will allow UDX to (i) provide a comprehensive development strategy, from conception to completion, (ii) ensure quality and consistency by setting standards for development and overseeing their implementation to create a cohesive, high-quality project, and (iii) manage the complexities of delivering a large-scale development such as obtaining planning approvals, licences and consents, implementing site-wide habitat creation and mitigation and delivering master infrastructure, all while creating and maintaining a long-term vision for the development of the Site over time.

This vision-led approach will allow UDX to create controls to deliver a high-quality visitor experience, with safety in mind, from the moment that they exit the highway at the A421 or step off the train at Wixams. The concept of an ERC of this nature, rather than simply delivering a theme

park, is what sets UDX apart. This type of world class ERC is only delivered in the theme park market by UDX and The Walt Disney Company, and is demonstrated by the ERCs in Florida, Osaka and Hollywood, all owned and operated by UDX and an ERC in Beijing which is operated by UDX.

The full description of what is meant by unified control is provided in the Introduction to this Planning Statement.

The Site and Surroundings

The Site comprises 268 ha of land located within the administrative area of Bedford Borough Council (Bedford BC). It is partly brownfield, being part of the former Kempston Hardwick brickworks, and is available for development. It also has suitable characteristics for an ERC in terms of size and being generally flat and uniform in shape, particularly in the southern portion of the Site. It is not subject to any on-site environmental or landscape designations, other than a small part of the County Wildlife Site (CWS) which covers the former clay pits to the northern part of the Site, which will primarily remain an ecological area. The Site is not designated as Green Belt. It is therefore a very good site for developing this type of use in planning and environmental terms.

Site Selection

UDX identified an opportunity to provide a new ERC in Europe and has been looking for a suitable site for some time. The UK is well-suited due to its temperate climate and good links with the rest of Europe, as well as a population with a strong connection to Universal parks, which millions of British residents visit each year.

UDX identified this site in Bedford as the ideal location because of its proximity to London, excellent transport links, reasonable employment catchment area, and presence of educational institutions to potentially provide workforce training, as well as convenient access for domestic and international tourists. The Site has convenient, fast rail links to London and London Luton Airport. Both the Site and Bedford are well connected for travel from all parts of the UK. The new Wixams Rail Station enhances public transport links to the Site even further and the EWR project also plans to deliver additional transport improvements locally, specifically improvements to the existing railway between Bletchley and Bedford. Availability of the land on commercially reasonable terms was also a factor.

Need for the Proposed Development

Government policy in the Plan for Change outlines opportunities and ambitions for the UK and region to enable reemergence of the economy from the pandemic and to help build and maintain high quality infrastructure and a strong economy and labour market. The direction of policy is to

create opportunities for significant private investment supported by a favourable policy landscape. In this context, there is a significant need for the private sector to come forward and make the ambitions a reality. The Proposed Development supports many of the pillars of enabling a thriving economy in terms of jobs, economic output and inward investment to the UK.

The Proposed Development, as a world-class ERC and international tourist destination, 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 not only jobs and growth but to create a new strand to the UK's bow as a tourism destination and enable a strong UK economy.

Benefits

The Proposed Development will be transformative for the region and deliver significant benefits to the UK as a whole. A summary of the socio-economic benefits arising from the Proposed Development is contained within **Appendix 6** which will include:

- creation of 8,050 direct operational jobs in the ERC on opening year;
- creation of 25,195 net additional jobs across the UK through the supply chain in the first year of operation, growing to 42,485 jobs across the UK by the 20th year of operation;
- creating 5,380 direct jobs at its peak construction; and
- providing an overall contribution of £35 billion net additional GVA (NPV) to the UK economy over a 30-year appraisal period (comprising 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.
- generating £14 billion (NPV) in net additional tax returns to HM treasury over the 30-year period. A further £104 million (NPV) would accrue to Bedford BC (i.e. via business rates retention), facilitating the delivery of additional local services.

The economic growth delivered by the Proposed Development will be transformational for Bedford BC and the surrounding communities. The role of the UK planning system is to support such growth, and make sure it is delivered in a sustainable way, minimising any negative impacts and enhancing positive impacts as far as practicable.

UDX has also committed to specific targets in its **Employment and Skills Plan (Document Reference 6.12.0)** which will ensure that the opportunities created by the development are realised for local and young people, disadvantaged groups and those in unemployment or economically inactive.

In addition to the socio-economic benefits identified above, the Proposed Development delivers road and rail infrastructure improvements by providing a new public road through the centre of the Site and a new railway station at Wixams which will also benefit local communities. Wixams railway station was granted planning permission in March 2024, with a commitment by Network Rail and Bedford BC to deliver a two-platform station. The Proposed Development expands the Wixams railway station further west to enable the opportunity to serve the ERC as well as the local community. The Proposed Development is therefore not only delivering a sustainable solution to meeting its own transport needs but is facilitating the wider growth of Bedford.

Other benefits include the enhancement of the water environment, with the creation of new or re-profiled watercourses and water bodies and measures to protect riparian and aquatic habitats from disturbance or degradation, to support protected or important plant and animal species. Enhanced SUDS features and strategic rainwater harvesting will in turn reduce on and off-site flood risk.

Consenting Approach

The Proposed Development would be controlled through the Description of Development, Plans (Operative and Parameter Plans), Dependencies, Land Use Limitations and conditions, which together describe the type and location of uses permitted within the Site. It is further controlled by Controlling Documents, including Design Standards and Environmental Controls Document which would give UDX the ability to develop within agreed and assessed limits. This approach provides the required flexibility to deliver a world class ERC and allow it to evolve and respond to new technologies and innovations while maintaining appropriate limits on such development. This level of flexibility is critical to the success of the project, and without it there would be a major obstacle to its successful delivery.

The Design Standards include maximum heights for specific uses and locations within the Site and an articulated skyline Design Standard which seeks to create visual interest and limit development massing. UDX is also proposing a post-decision approval process which would ensure that the decision-maker has the appropriate level of control over the final appearance of the Proposed Development, whilst enabling sufficient flexibility. Further detail on the way in which this would work is set out in the **Design and Access Statement (DAS) (Document Reference 6.2.0)**.

Public Engagement

UDX carried out Public Engagement on the Proposed Development in April and May 2024. In summary, 92% of people who responded supported a Universal ERC on this Site. UDX has also been working closely with Bedford BC and held topic specific meetings with religious and community groups, blue light services and education and training providers, the Internal Drainage Board (IDB) and other stakeholders. The road and rail elements of the Proposed Development have been developed in conjunction with National Highways, Network Rail and EWR. The DfT and National Highways have also been working collaboratively with UDX to develop the transport model, to make sure that the traffic effects of the Proposed Development are properly understood and appropriately mitigated. UDX has also engaged with key statutory bodies following the April 2025 announcement, including agreeing Summaries of Agreed Position (SOAPs) and letters of support, which are appended to this Planning Statement (**Appendix 4**).

Planning Assessment

An opportunity like the Proposed Development could not have been envisaged when the current planning policy framework was devised, both with respect to the NPPF and Bedford BC Local Plan. The assessment therefore considers compliance of the Proposed Development with policy, whilst recognising that it is not designed to deal with opportunities of the scale proposed. The planning balance therefore considers national and local policy but is also focused on the overall outcomes, in terms of both potential benefits and adverse impacts.

It is inevitable that a transformative development of this scale will have both positive and negative impacts. It is the purpose of the **Design Standards (Document Reference 6.3.0)**, **Environmental Controls Document (Document Reference 6.16.0)** and other mitigation measures to make sure that adverse impacts are limited to the extent feasible, whilst not unduly constraining the delivery of a world class ERC, which is the very thing that the economic and other benefits to Bedford, the region and the UK are derived from.

The proposal achieves a high level of consistency with the key themes within the National Planning Policy Framework (NPPF) (2024). In particular, the Proposed Development will:

- meet the three sustainability objectives, economic, social and environmental (Paragraph 8);
- contribute to the local and national economy (paragraphs 85 and 89);

- contribute to the network of high quality open space and provide increased opportunities for sport and physical activity, whether or not the sports complex is delivered (paragraphs 96 and 103);
- result in the productive use of brownfield land (paragraphs 89 and 124); and
- provide a well-designed and beautiful place (paragraph 131 and 135).

The Proposed Development is also highly consistent with the overall vision and objectives of the Bedford Local Plan 2030. In particular, the Proposed Development will:

- provide significant contribution to the local economy, deliver economic growth and broaden employment opportunities (paragraph 4.3 and theme 3);
- facilitate improvements to the Bedford BC's transport infrastructure through the delivery of an expanded Wixams Rail Station, safeguarding part of the Site for a new EWR Railway Station and encourage walking, cycling and other sustainable and healthy modes of transport (paragraph 4.7 and theme 2);
- support the creation of a strong and multifunctional green infrastructure network and delivery on the spirit of the objectives of the Forest of Marston Vale (paragraph 4.8 and theme 1); and
- provide a high-quality development that makes use of previously developed land (paragraph 4.9 and theme 4).

The Promoter has proposed significant mitigation measures across a number of topics to seek to reduce the environmental effects of the Proposed Development, including substantial Ecological Enhancement Areas (EEAs), a generous landscaped perimeter around the Site and Design Standards and post-decision approval process to control the way in which the detailed design will come forward.

Nevertheless, the Proposed Development is large and on a Site that is currently predominantly vacant. Accordingly, while for the majority of environmental effects, the Proposed Development will generate effects that are not considered significant in Environmental Impact Assessment (EIA) terms, there are some residual significant adverse effects after mitigation, including:

- landscape and visual effects during construction and operation;
- noise during construction and operation, predominantly during the nighttime and special events scenarios;

- traffic and transport effects relating to non-motorised users' amenity (Wootton and Woburn Road), driver delay (Fisherwood Road), and risk of accidents and safety (Broadmead Road);
- ecology in terms of loss of woodland and reedbed habitat but only during construction, and moderate adverse effects on breeding and wintering birds, terrestrial invertebrates and commuting and foraging bats, with only impacts on bats remaining by operation stage;
- ground conditions and soils with respect to the permanent loss of approximately 43ha of BMV agricultural land;
- above-ground heritage assets, although not resulting in substantial harm; and
- the total loss of a non-designated heritage asset (a historically important hedgerow in the Core Zone) of medium significance, resulting in a residual minor adverse effect in EIA terms.

In addition to the significant economic benefits outlined above, the Proposed Development will also include some other beneficial environmental impacts, including as a result of the new substantial wetland ecosystem created and delivered by the Habitat Creation and Enhancement controls in the **Environmental Controls Document (Document Reference 6.16.0)**, including benefits to otter, fish, aquatic macroinvertebrates and macrophytes (aquatic plants).

The Promoter has taken a proactive approach to the delivery of Green Infrastructure and the planning proposal is also accompanied by an assessment following Natural England's methodology, set out in the **DAS, Appendix 1 - Green Infrastructure Statement (Document Reference 6.2.0)**.

Some of the adverse effects have been identified on the basis that detailed design has not yet been able to determine precise mitigation measures, or simply because of the scale of change to a site which has been disused for a period of time and is highly visible in the surrounding landscape.

In terms of national and local policy compliance, in most cases these effects are either fully compliant with policy, or compliant with the intent of policy.

The Proposed Development complies with policy on all levels with regard to enabling conditions for people and businesses to thrive and the economy to grow. It also benefits from strong support through national policy on tourism and economic development.

Planning Balance

As national and local planning policy was not devised to contemplate an opportunity such as that proposed, the presumption in favour of sustainable development in the NPPF has been considered, which states that where there is no relevant policy, permission should be granted unless any

adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole. Although there are 'relevant policies' none were written to directly contemplate a development of the type proposed and there are no specific national or local policies for consideration of theme park development, or an ERC.

In addition to the economic and transport benefits identified above (which are also detailed in Section 9 of this Planning Statement), the Proposed Development has been reviewed against the relevant national and local planning policy guidance. Our subsequent assessment confirms that the Proposed Development will:

- make efficient use of the land, providing high quality development on previously developed land that has been identified for future growth;
- deliver high-quality built development while also contributing positively to natural landscape, including the Forest of Marston Vale;
- provide significant additional landscape and tree planting from the current position of brownfield land and intensively farmed agricultural fields;
- make sure that wildlife habitats within and adjacent to the Site are suitably enhanced; and
- providing a stimulus of inward investment to deliver transformational change across the local area, including enabling opportunities for town centre regeneration strategies to be realised in Bedford, Central Bedfordshire, Luton and Milton Keynes.

In addition to the material considerations of policy, another material consideration is the very high level of public support for the Proposed Development. 92% of people, many of them local, responded to the survey carried out between April and May 2024 saying that they supported the delivery of a Universal ERC in this location, which is an almost unprecedented level of support for major developments in the UK.

There are also very high levels of support for the project proceeding from local authorities, Bedford BC, Central Bedfordshire, Milton Keynes City Council, Luton Borough Council, North Northamptonshire and West Northamptonshire. The leaders and chief executives of these six local authorities have written an open letter of support for the project.

UDX has worked with statutory consultees to seek to address as many issues as possible in advance of the planning proposal submission. The result of this is set out in the SOAPs and letters of support provided at **Appendix 4** of this Planning Statement.

The adverse effects reported in the ES are not considered to significantly and demonstrably outweigh the very substantial benefits of the project.

This Planning Statement has also considered other material considerations, including workforce management, impact on services, safety and security, people and communities, health, fire, utilities and cumulative effects. Taken together, the planning balance is considered to lie strongly in favour of the Proposed Development.

GLOSSARY

Table 1 – Acronyms

Acronyms that are not defined within this document shall have the same meaning as set out in **Environmental Statement Chapter 00 – Table of Contents (Document Reference 2.0.0)**; and **Appendix 0 of the ES – Acronyms and Glossary (Document Reference 4.0.0)**. Those acronyms used in this document that are not defined in Chapter 00 are defined in Table 1.

Acronym	Description
ALC	Agricultural Land Classification
Bedford BC	Bedford Borough Council
BMV	Best and Most Versatile (in the context of DEFRA Agricultural Land Classification)
CCTV	Closed Circuit Television
DAS	Design and Access Statement
DEFRA	Department for Environment, Food and Rural Affairs
EA	Environment Agency
EIA	Environmental Impact Assessment
ES	Environmental Statement
ERC	Entertainment Resort Complex
EWR	East West Rail
GSM	The Global System for Mobile Communications
GVA	Gross Value Added
ha	Hectare
HE	Historic England
HSE	Health and Safety Executive
IDB	Internal Drainage Board
MHCLG	Ministry for Housing, Communities and Local Government
NE	Natural England
NMU	Non-Motorised User
NPV	Net Present Value
OCEMP	Outline Construction and Environmental Management Plan
OHCEP	Outline Habitat Creation and Enhancement Plan
OLEMP	Outline Landscape and Ecology Management Plan
UDX	Universal Destination & Experiences

Table 2 – Defined Terms

Capitalised terms that are not defined within this document shall have the same meaning as set out in **Appendix 0.1 of the ES – Acronyms and Glossary (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.

Term	Definition
A421 junction	A new road 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.
Consenting Envelope	A general term that refers to the Proposed Development that is assessed in the Environmental Statement, as controlled by the Design Standards, parameters plans, proposed conditions, limitations, dependencies and other Controlling Documents including the Environmental Controls Document.
Controlling Document	Documents which place controls on the Proposed 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 (for Approval)	Operative documents are limited to the Site Location Plan and Primary Access Plan, which control the Site to which any planning permission granted would relate and the primary roadway access points to the existing road network.
Planning proposal	The proposal being made to MHCLG.
Supporting Document	Documents provided for information (not for approval), to assist in MHCLG's assessment of the Proposed Development, but which do not place controls on the Proposed Development.
TCPA 1990	The Town and Country Planning Act 1990.

1.0 INTRODUCTION

Background

- 1.1 This Planning 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 necessary infrastructure to support the ERC across the Site, 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 Entertainment Resort Complex (ERC) lying within parts of 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 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.
- 1.4 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.

The Planning Proposal

- 1.5 UDX is submitting a planning proposal to MHCLG to ask them to consider granting planning permission for the Proposed Development, via a Special Development Order (SDO). An SDO is an alternative to a planning permission granted by a local planning authority, a local development order or a development consent order. It is legislation made by the Secretary of State granting planning permission for the development set out in the order.
- 1.6 The proposal does not meet the thresholds for a Nationally Significant Infrastructure Project (NSIP) to be determined under the Planning Act 2008. The NSIP threshold is 12.5ha for the construction or alteration of roads operating at 50mph or above and where the highway authority is either the Secretary of State or a strategic highways company. The road infrastructure component of the proposal only comprises 11.86 ha and as such is under the threshold. The NSIP threshold for railways is the construction or alteration of a stretch of track that has a continuous length of more than 2km and is not on land that was operational land of a railway undertaker immediately before the construction or alteration and where the railway will be part of a network operated by an approved operator. Similarly, the NSIP threshold for energy generation is 50MW and while the proposal includes on-site energy generation, it will not exceed 49.9MW and as such will be under that threshold. In addition, limitations are included within the **Land Use Limitations (Document Reference 1.17.0)** which will prevent the relevant NSIP thresholds from being exceeded. Full consideration of the Proposed Development against the Planning Act 2008 highways thresholds is provided at **Appendix 3 of this Planning Statement**.
- 1.7 An SDO is made pursuant to Section 59 of the TCPA 1990, which allows for the Secretary of State to make an order to provide for the granting of planning permission. Section 59(3) states that this can either be a) as a general order applicable to all land or b) as a special order applicable only to such land or descriptions of land as may be specified in the order. The Proposed Development falls within subsection (3)(b) of Section 59. There are no regulations which relate to the form or content of an SDO. The provisions of the Town and Country Planning (Development Management Procedure) (England) Order 2015 do not apply to planning proposals submitted directly to MHCLG (except those made under Section 62A of the TCPA 1990), as they do to planning applications made to local planning authorities.
- 1.8 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) require an EIA to be carried out in relation to a proposal which would have likely

significant effects on the environment. An **Environmental Statement (ES) (Volumes 1-4)** has been prepared and is submitted with the planning proposal.

- 1.9 There is no statutory requirement for planning proposals made directly to MHCLG to be determined in accordance with the Development Plan (as there is for planning applications under Sections 62A and 70(2) of the TCPA 1990) or in accordance with any relevant National Policy Statement (NPS, as there is for Nationally Significant Infrastructure Projects). However, despite the Development Plan having no statutory basis in the determination of the planning proposal, as a general principle national and local planning policy will still be material considerations for the Secretary of State to consider when deciding whether or not to grant planning permission. It is therefore still appropriate and necessary to consider the extent to which the uses and development included in this planning proposal would comply with relevant national and local planning policies. This Planning Statement is therefore provided for information purposes to address that aim.
- 1.10 If granted, the planning permission would permit the construction and operation of the Proposed Development. The **Site Location Plan (Document Reference 1.6.0)** shows the limits for the Proposed Development, which covers 268 ha of land, located to the south-west of Bedford within the administrative area of Bedford BC. It is noted that this area is different from the area provided in publicity material relating to UDX's decision to proceed with a development of an ERC in Bedford (of 500 acres or 202 hectares). This is due to the difference in the size of the land originally purchased by UDX and the area included in the Site boundary of the planning proposal, which includes publicly owned roads and railways.
- 1.11 The Proposed Development would deliver transformative benefits to the local area and region. This includes the creation of 8,050 direct jobs in the first year of operation, 81% of which are anticipated to be taken by local¹ people and up to 12,465 people directly employed by 2051. Furthermore, there is anticipated to be 25,195 net additional jobs created across the UK through the supply chain in the first year of operation, growing to 42,485 jobs across the UK by the 20th year of operation. In addition, the Proposed Development would support 5,380 construction jobs at its peak, with continuing construction workforce requirements for the foreseeable future. **Appendix 6 to this Planning Statement (Socio-economic benefits)** anticipates that the Proposed Development could provide an overall contribution of £35 billion net additional GVA (NPV) to the UK economy over a 30-year appraisal period (comprising construction and the first 25-years of operation) which would

¹ Living within Bedford Borough Council area, Central Bedfordshire, Luton and Milton Keynes

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.

- 1.12 The planning proposal includes the redevelopment of a brownfield site that was previously a former industrial brickworks facility. This redevelopment will include the transformation of the former clay quarry pits into strategic surface water management facilities and enhanced new wetland habitats.

Consenting Approach

- 1.13 Any planning permission granted would be for a flexible form of development, within set limits as set out in the Consenting Envelope. The Consenting Envelope will allow for the likely significant environmental effects of the Proposed Development to be assessed and considered in the determination process, whilst also allowing an appropriate degree of flexibility, recognising that the Proposed Development will continue to evolve and there will be ongoing secondary development throughout the life of the ERC, particularly in the Core Zone.
- 1.14 The Consenting Envelope is proposed to be controlled by the following:
- Operative and Controlling documents (**Document Reference 1.16.0**); including Parameter Plans and other Controlling Documents including the Environmental Controls Document;
 - Land Use Limitations (**Document Reference 1.17.0**);
 - Dependencies controlling elements of the Proposed Development to be delivered at various stages of development (**Document Reference 1.18.0**); and
 - Proposed Conditions attached to any planning permission, including the proposed post-decision approval process (**Document Reference 1.5.0, Proposed Conditions**).
- 1.15 These documents, together with the proposed **Description of Development (Document Reference 1.9.0)** limit the development which could come forward under any planning permission granted. Chapter 5 provides further details on the Proposed Development and explains the proposed controlling documents.
- 1.16 The planning proposal is also accompanied by a series of Supporting Documents which are provided for information (not for approval), to assist in MHCLG's assessment of the Proposed Development, but which do not place controls on the Proposed Development.
- 1.17 This consenting approach provides the required flexibility to not only deliver a world-class ERC, but to allow it to evolve and respond to new technologies and innovations. It is critical to the success

of such a project that this level of flexibility is permitted; without it there would be a major obstacle to its successful delivery.

Unified Control of Development

- 1.18 Universal Destinations & Experiences (UDX) is seeking consent for an Entertainment Resort Complex (ERC) and necessary infrastructure to support the ERC across the Site.
- 1.19 UDX will be the master developer, with National Highways constructing the new A421 junction and Network Rail building Wixams Rail Station and carrying out works to close the Manor Road level crossing.
- 1.20 UDX will exercise appropriate oversight over all aspects of development of the ERC, including initial planning and design, coordination of the infrastructure, construction and setting the framework for the long-term management of the ERC.
- 1.21 This unified control approach will allow UDX to (i) provide a comprehensive development strategy, from conception to completion, (ii) ensure quality and consistency by setting standards for development and overseeing their implementation to create a cohesive, high-quality project, and (iii) manage the complexities of delivering a large-scale development such as obtaining planning approvals, licences and consents, implementing site-wide habitat creation and mitigation and delivering master infrastructure, all while creating and maintaining a long-term vision for the development of the Site over time.
- 1.22 This vision-led approach will allow UDX to create controls to deliver a high-quality visitor experience, with safety in mind, from the moment that a guest exits the highway at the A421 or steps off the train at Wixams Rail Station. The concept of an ERC of this nature, rather than simply delivering a theme park, is what sets UDX apart. This type of world class ERC is only delivered in the theme park market by UDX and The Walt Disney Company, and is demonstrated by the ERCs in Florida, Osaka and Hollywood, all owned and operated by UDX and an ERC in Beijing which is operated by UDX.
- 1.23 The ERC concept for this proposal is largely based on the definition in the State of Florida's regulations for the ERCs that UDX and Disney own and operate in Florida. The ERC is defined as the "proposed Theme Park together with other uses such as retail, dining, indoor and outdoor entertainment, cultural and sports venues, visitor accommodations, and recreational facilities, associated services and uses for any operational or administrative functions of the ERC (such as office buildings and warehouse/storage facilities), utilities, parking, access routes and landscaping", as further described in detail in the **Description of Development (Document Reference 1.9.0)**

located in the area designated on the **Parameter Plan: Entertainment Resort Complex Land Use Plan (Document Reference 1.10.0)**.

- 1.24 The planning proposal contemplates that development could be undertaken by UDX and those under contract with UDX and by relevant statutory undertakers. It is considered that this is appropriate in light of the commitments regarding the Minimum Development Programme (MDP) (see paragraphs 5.7-5.10 of this Planning Statement) and the unique provisions of the proposal related to unified design and unified control.
- 1.25 The **Dependencies Table (Document Reference 6.18.0)** sets forth the commitment regarding the MDP. Unified design measures that provide assurance of the proper development of the Project include the **Design Standards (Document Reference 6.3.0)** as well as the post-decision approval process set forth in conditions 7 – 10 of the **Proposed Conditions (Document Reference 1.5.0)**. Relevant aspects of unified control include those set forth in the confidential **Security and Emergency Management Plan (Document Reference 6.4.0)** and the Travel Plan (**Document Reference 4.5.6.0**).
- 1.26 UDX will retain a level of control over the use and design of buildings and public realms across the whole area within the ERC. Further, UDX intends to work with Statutory Undertakers and Governmental bodies such as National Highways, Bedford Borough Council and Network Rail to encourage this design to be coordinated and continue across the public realms that are within or proposed to be within their control upon completion, such as adopted highways and rail station development.
- 1.27 It is envisaged that any Order for the development would require all development within the Site to comply with the following documents, which will provide ongoing controls on the ERC including:
- Landscape and Ecology Management measures in the **Environmental Controls Document (Document Reference 6.16.0)** – contains commitments on long-term management and maintenance of landscaped areas, woodland and trees.
 - **Security and Emergency Management Plan (SEMP) (Document Reference 6.4.0)** – contains security and emergency management measures for the ERC.
 - **Design Standards (Document Reference 6.3.0)** – contain measures which control the design of the Site and set out the process by which certain aspects of design detail will be delivered across the Site. Following any planning consent, UDX will proceed to further develop its design intent and guidance for each of the zones within the ERC to be presented

in the form of a Zonal Masterplan and Zonal Design Standards for the key elements of the development, all of which will be reviewed and approved by MHCLG pursuant to a condition in any Order for the development on the post-decision approval process.

- 1.28 These measures will collectively ensure that there will be a consistent method of unified control of development throughout the ERC.

Purpose and Structure of Document

- 1.29 This Planning Statement assesses compliance of the Proposed Development with relevant national and local policy as well as considering any other material considerations that should be taken into account by the decision-maker in determining whether to grant planning permission (known as the planning balance).

- 1.30 The remainder of the Planning Statement is structured as follows:

- Chapter 2 – Need for the Proposed Development
- Chapter 3 – Public Engagement
- Chapter 4 – Site Context
- Chapter 5 – Proposed Development
- Chapter 6 – Legislative and Policy Framework
- Chapter 7 – Assessment Against Planning Policy
- Chapter 8 – Other Material Considerations
- Chapter 9 – Conclusion and Planning Balance

Planning Proposal Guide

- 1.31 The **Guide to the Planning Proposal (Document Reference 1.4.0)** lists and explains the purpose of the documents which accompany the submission, including whether they are Operative Documents submitted for approval, submitted as Controlling Documents, or Supporting Documents submitted for information.

2.0 NEED FOR THE PROPOSED DEVELOPMENT

- 2.1 This section of the Planning Statement provides an overview of the need for the Proposed Development in the context of current and emerging national economic and tourism policy. Planning policy is considered separately in Sections 7 and 9 of this document.

National Policy Context to Need Case

April 2025 announcement

- 2.2 The UK Government announced in April 2025 (press release published 9 April 2025) that:

“a multi-billion-pound investment in a major new Universal theme park and resort in Bedford has been agreed between Universal, the government and the local council, in a move that represents a major vote of confidence in the UK economy and the future of partnerships between the UK and the US....

Supporting the government’s Plan for Change to create economic growth and opportunities by getting people into well-paid, decent jobs across the creative, technology, tourism and hospitality sectors, Universal has committed to working with local colleges and universities to train the next generation of its hospitality workforce, including through a range of apprenticeships and internships.

As well as generating significant opportunities, the new theme park and resort will bring significant local benefits – with approximately 80% of employees at the theme park expected to come from local areas – and support a stream of ongoing work to unleash the potential of the Oxford-Cambridge corridor through growth, infrastructure revitalisation and further job opportunities.

Universal expects the site to generate nearly £50 billion for the economy by 2055, with 8.5 million visitors expected in its first year – becoming the largest visitor attraction in the UK. This will support the government to deliver its growth mission – creating higher living standards and putting more money in people’s pockets.”

- 2.3 The Prime Minister made it clear in his statement that this investment supported the government’s Plan for Change: Milestones for Mission-Led Government² (the ‘Plan for Change’) saying:

“Today we closed the deal on a multi-billion-pound investment that will see Bedford home to one of the biggest entertainment parks in Europe, firmly putting the county on the global stage. This is our Plan for Change in action, combining local and national growth with creating around 28,000 new jobs across sectors such as construction, AI, and tourism. It is not just about numbers; it’s about securing real opportunities for people in our country. Together, we are building a brighter future for the UK, getting people into work and ensuring our economy remains strong and competitive.”

² HM Government (2024) Plan for Change (Milestones for a Mission-led government)

- 2.4 Whilst the press release made it clear that the proposals would be subject to planning permission, which would be considered at a later date, it is also clear from the announcement that the delivery of a Universal ERC is consistent with government economic and tourism policy and would deliver substantial benefits to the UK.

Plan for Change (December 2024)

- 2.5 The Government published its Plan for Change – *Milestones for mission-led government* in December 2024. The five national missions that set the direction of change are:
1. Kickstart economic growth
 2. Build an NHS fit for the future
 3. Safer streets
 4. Break down barriers to opportunity
 5. Make Britain a clean energy superpower
- 2.6 The Proposed Development supports aims 1,3 and 4.
- 2.7 The Plan for Change identifies that kickstarting economic growth is also about raising living standards in every part of the UK and sets a milestone of higher living standards for every part of the United Kingdom by the end of the Parliament. It states that “*the main route to higher living standards is through good, productive jobs, stable employment, and a thriving business environment.*”
- 2.8 Approximately 81% of the employment opportunities created by the ERC will be for people from the local area. **Chapter 13 of the ES, Socio-economics** clearly sets out the transformative socio-economic benefits of the Proposed Development for the entire region.
- 2.9 The **Employment and Skills Plan (Document Reference 6.12.0)** (considered further in Section 7.0 of this Planning Statement) sets out how the Promoter will put measures in place to improve the ability of young and local people to access the opportunities created by the Proposed Development, including commitments to internships and apprenticeships, mentorships and support for disadvantaged students, to break down barriers to opportunity.
- 2.10 The **Security and Emergency Management Plan (Document Reference 6.4.0)** contains commitments to maintain public safety.
- 2.11 In terms of economic policy on tourism, whilst published by the previous government, the Tourism Recovery Plan sets out strategic objectives in terms of laying foundations to encourage inward

investment and ensure that the UK remains a globally desirable destination for visitors. Also of relevance is the recently published British Tourist Authority Framework 2024 – 2027.

2.12 These policy documents set out strategic objectives rather than specific measurable targets. They were initially borne out of planning the UK's emergence from the COVID-19 pandemic and set the path for rebuilding the economy and kickstarting the tourism industry. The strategies focus on removing barriers to investment and growth and reinforcing the UK's position as a global leader in tourism and as a place to do business. The key priorities which are relevant to the Proposed Development are identified below.

[Tourism Recovery Plan \(updated March 2023\)](#)

2.13 The Tourism Recovery Plan (TRP) is the Government's strategic framework for supporting and working with the tourism sector. The Plan notes that pre-pandemic (2019) tourism made a direct economic contribution of £74.5bn to the UK economy, representing about 4% of the UK's total GVA. Approximately 4 million people were also directly or indirectly employed in jobs serving tourists. The pandemic had a profound impact on the tourism industry, although provisional data from VisitBritain for Q1 2024 showed that visitor numbers were set to increase on pre-pandemic levels.

2.14 The TRP wants to build on the UK's position as one of the most desirable tourist destinations in the world by:

- effectively showcasing and marketing the country's tourism assets;
- attracting domestic and international visitors; and
- seeing a growing, dynamic, sustainable and world-leading tourism sector reach its full potential by creating jobs and driving growth in every region of the UK.

2.15 In order to do this, the Government set out the following strategic objectives:

- Objective 1: A swift recovery back to 2019 levels of tourism volume and visitor expenditure.
- Objective 2: As tourism recovers and then exceeds 2019 levels, the Government wants to see the benefits shared across every nation and region.
- Objective 3: To build back better with a more productive, innovative and resilient tourism industry.
- Objective 4: A tourism industry that contributes to the enhancement and conservation of the UK's cultural, natural and historic heritage and minimises damage to the environment.

- Objective 5: A tourism industry that provides an inclusive and accessible offer that is open to all.
- Objective 6: For the UK to be a leading European nation for hosting business events.

2.16 A world-class ERC would meet a number of these objectives including:

- a significant increase in tourism volume and spending;
- sharing the benefits across the UK through providing an influx of spending which will support investment in education and skills and in town centres which are struggling and are in need of improvement;
- diversification of the tourism industry through provision of a world-class theme park which the UK doesn't currently have, which increases resilience;
- provision of a world-class destination that is inclusive and accessible (further information is provided in the **DAS (Document Reference 6.2.0)**); and
- providing a catalyst for the UK hosting business events because it provides family friendly activities while one or more members of the family attend business events.

2.17 At a granular level, the TRP provides details about how the UK responded and will continue to respond and adapt to the pandemic. The TRP states that the Government wants domestic and international visitors to spend more, stay longer, visit throughout the year and access a more diverse range of destinations throughout the country. Bedfordshire is not a focus for tourism today and Chapter 13 of the ES, Socio-economics notes that it generally only hosts smaller scale attractions, with Whipsnade Zoo being the largest attraction with 830,000 visitors annually. The TRP further advises that tourism goes beyond economic and job-related impacts and can have a positive impact on physical, mental and emotional wellbeing. The TRP notes that experiencing the UK first hand adds to the UK's 'soft power' and builds the UK's global reputation. In addition, and importantly in the context of the Proposed Development, the TRP states that the Government is committed to *"supporting those UK assets that draw in domestic and international tourists and developing the country's tourism offer in new ways."*

[British Tourist Authority framework document 2024 - 2027](#)

2.18 The British Tourist Authority framework document 2024 - 2027 (BTA) is a framework document which sets out how the BTA and DCMS will work together to help deliver the statutory functions of the BTA, as set out in Section 2 of the Development of Tourism Act 1969, which are:

- i) to encourage people to visit Great Britain and people living in Great Britain to take their holidays there; and
- ii) to encourage the provision and improvement of tourist amenities and facilities in Great Britain.

2.19 The BTA strategic aims are set out in their Three-Year Vision, within its framework document. The relevant BTA strategic aims to the Proposed Development may be summarised as to:

- rebuild international visitor value;
- position Britain as a dynamic, diverse, sustainable and inclusive destination, prioritising regional and season dispersion and improved productivity; and
- build the English visitor economy.

Relevant Strategic Policy: Local and Regional Context

2.20 At a regional and local level, the relevant strategic policy is set out in:

- South East Midlands: Strategic Plan for Arts, Heritage, Sports, Visitor Economy, Cultural and Creative Industries; and
- South East Midlands Economic Recovery Strategy.

[South East Midlands: Strategic Plan for Arts, Heritage, Sports, Visitor Economy, Cultural and Creative Industries](#)

2.21 The strategic plan quantifies the direct economic impact of the arts, heritage, sports, visitor economy, cultural and creative industries (AHSVEC&C) in terms of jobs, businesses and turnover. The primary objective of the plan is to encourage growth in the AHSVEC&C industries.

2.22 The plan identifies the significant contribution AHSVEC&C industries make to the South East Midlands region with 9,600 cultural and creative enterprises with a combined turnover in excess of £2.5bn, employing 27,000 people. In addition, the visitor economy supports around 59,400 jobs accounting for about 8% of total jobs.

[Economic Recovery Strategy for the South East Midlands \(September 2020\)](#)

2.23 The strategy document, originally published by the now closed SEM Local Enterprise Partnership (SEMLEP), pulls together the actions that the Local Economic Partnership and local partners have taken, and were taking, to help the region recover from the pandemic and to grow and prosper over the longer term. Despite the SEMLEP no longer being in existence, the document contains some useful information on regional growth priorities.

2.24 The strategy sets out a 3-tiered response approach to ‘survive’, ‘stabilise’ and ‘grow’ key social, environmental and economic areas (drawn from the SEM Industrial Strategy): ideas; people; infrastructure; business environment; and place. Under ‘business environment’ the strategy looks to focus on scale-up activity and diversification. It also commits to ongoing work to promote inward investment. In order to grow, the strategy sets out that the Local Enterprise Partnership will increase promotion of the SEMLEP area to prospective investors and help match prospective businesses with appropriate employment land. The Economic Recovery Strategy also includes provision for awarding Kickstarting Tourism revenue grants, showing the importance of the tourism industry to the region.

Theme Park Industry

- 2.25 The UK tourism market is large and growing; it is estimated to support approximately 4% of GVA. VisitBritain forecasts 43.4 million inbound visits and £33.7bn spend in 2025.
- 2.26 According to AECOM’s Theme Index 2023, global theme park attendance first exceeded over half a billion visitors in 2018, equivalent to almost 7% of the world population. UDX saw an 18% rise in visitors from 2022 to 2023 with over 62 million in attendance at attractions around the world. Globally, the theme park market is dominant (2023 figures) in the US and Asia which account for 9 of the top 10 and 22 of the 25 most well-attended theme parks. Indeed, visitor numbers to theme parks in Europe account for less than 10% of the total number of visits to the 25 most visited theme parks worldwide. The European theme park market is dominated by Disneyland Paris which saw 10.4 million visitors in 2023: over 4 million visitors more than the cumulative attendance at the top 3 most visited theme parks in the UK (Legoland, Alton Towers and Thorpe Park).
- 2.27 In the UK, growth in the theme park industry has been tepid as the impacts of Brexit (both actual and perceived) as a barrier to entry have played out. The Government also ended the VAT Retail Export Scheme which is reported to have deterred over 2 million tourists and cost over £10bn in sales to the UK economy. However, provisional data for 2024 indicates that inbound visits to the UK have, for the first time, surpassed pre-pandemic levels. In 2023 the UK was the 7th most visited country across the globe with over 37 million visitors, is 4th (out of 60 nations) in the Nation Brands Index (2023) and remains high (8th place) on the World Bank’s ‘Ease of Doing Business’ rank, indicating the foundations for the delivery of a new world class destination are firmly in place. Taking into account both population and number of visitors, the UK might expect to have a minimum of two global theme parks, and the lack of any world-class theme parks shows a clear under provision, but also presents a generational opportunity to deliver such a destination.

Need for a UDX ERC

- 2.28 The policy direction outlined above clearly sets out the basis for the need for private sector investment on a large scale. Furthermore, investment which facilitates jobs and growth while simultaneously providing a unique offering to the UK tourism industry provides an opportunity to deliver on a number of key aims of government policy. Strategic policy in this context isn't explicit to the extent that it sets out that the UK should, for example, build a new theme park, but it evidences the need for the market to deliver proposals that actively support job creation and encourage inward investment, as well as being clear on the benefits to the UK of enhancing and growing the visitor economy.
- 2.29 UDX, alongside Disney, are the market leaders in delivering exceptional quality theme park experiences. There are no other comparable operators.
- 2.30 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 ERC in the UK is a generational opportunity to not only deliver jobs and growth but to create a new strand to the UK's bow as a tourism destination. The foundations are already in place in terms of the UK's attractiveness as a tourist destination and the Proposed Development presents an excellent opportunity to create a destination that significantly expands the UK's tourist offering as well as providing a catalyst for infrastructure and regional and national growth.
- 2.31 In the context of the UK's continued economic recovery, there is a clear need for the Proposed Development, both in terms of inward investment and jobs, but also enabling the UK to be a leader in the European and worldwide theme park market.

Need for Infrastructure

- 2.32 The road, rail and active travel improvements within the Proposed Development are designed to ensure that the traffic impacts on the local area are managed to acceptable levels. On the basis that there is a clear need for the ERC, there is also a clear need for the infrastructure included in the Proposed Development. The **Transport Assessment (Appendix 5.1 to the ES) (Document Reference 4.5.1.0)** describes the transport elements of the Proposed Development in further detail, including why they are necessary to deliver the proposed transport vision.

Case study on economic benefits arising from Universal ERC's in Metro Orlando

- 2.33 A case study on the way in which the employment and growth generated by Disney World and the Universal ERCs in Florida led to the transformation of the Orlando economy is provided at Appendix 9. This saw total jobs increase by 270% between 1990 and 2025. This was not just in the leisure and

hospitality sector and the greatest increase was seen in professional, scientific and technical services which saw a growth of 521% in the same period. Jobs in education and healthcare increased 434% in the same period. This is because it isn't just the tourism economy that benefits from a major new ERC, it is all of the firms that help create and maintain it such as those that design and make the rides. In Orlando, this has also spurred growth in education and training programmes that boost workforce development. This includes the Rosen College of Hospitality Management at the University of Central Florida –the #1 ranked school in the world for hospitality education and Orlando's Creative Village initiative specifically aims to attract high-tech and creative companies by collocating them with educational institutions. The success of this initiative is tied to the city's established technology and innovation economy, significantly influenced by the theme park industry.

3.0 PUBLIC ENGAGEMENT OVERVIEW

- 3.1 The NPPF highlights the importance of engagement in the planning process. Paragraph 40 of the NPPF states, *'Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community'*.
- 3.2 UDX has carried out meaningful public engagement, with thousands of individuals providing comments and detailed feedback across four phases of engagement comprising:
- Phase 1 – Early engagement with the host authority and strategically important bodies (September 2022-December 2023)
 - Phase 2 – Confirming the acquisition of the land and exploration of the potential for a new ERC (December 2023-March 2024)
 - Phase 3 – Public engagement on formative proposals (April 2024-May 2024)
 - Phase 4 – Reviewing and incorporating feedback (May 2024-April 2025)
 - Phase 5 – Re-engagement with key statutory bodies following April 2025 announcement, including agreeing Summaries of Agreed Position (SOAPs) (April 2025-June 2025)
- 3.3 Through this engagement UDX has heard a diverse range of views. The engagement included 180 key stakeholders, representing local community and business groups, as well as regional and national bodies, who have been contacted at several stages. The Site's 20 closest residents on Manor Road have also been directly contacted and kept informed about the proposals at each key stage.
- 3.4 UDX carried out a period of public engagement for 28 days which ended on 3rd May 2024. For this public engagement, around 7,700 local addresses were sent a promotional flyer, and two public events were held which welcomed 1,478 attendees. A dedicated paid social media advertising campaign was organised, alongside digital media advertising and local media outreach to generate significant coverage and widespread awareness of the proposals. As a result, 5,979 signed up for regular updates as part of a dedicated project mailing list.
- 3.5 UDX also launched and 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, as well as freephone and email which received 15 calls and 130 emails over the engagement period.

3.6 Feedback was collected through a range of different methods, including 6,111 surveys that were completed during the public engagement period between April and May 2024 and more than 120 meetings that have been held with key stakeholders since September 2022.

3.7 In April 2025, UDX announced its intent to build and operate the company's first ERC in the UK. UDX sent an update to all key stakeholders, including hand delivering letters and a summary of key facts to the 20 local addresses which adjoin the Site, and writing to 310 key stakeholders and approximately 8,275 residential and business addresses around the Site. A copy of this information was also sent by email to 5,480 people on the project's mailing list and uploaded on to the project website alongside a conceptual artist rendering of the proposed new ERC. The website was also updated to reflect the latest information about the project, including 10 frequently asked questions. To help publicise the announcement, a press release was sent to media, a press conference was held nearby the Site, and a paid online press advert was placed in the Bedford Independent for a week, generating widespread coverage as a result.

3.8 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 ERC on this site (survey question 8). Survey question 8 posed the following question:

"This project has the potential to be transformative for Bedford and deliver significant benefits for the UK economy. Our resorts create thousands of jobs, help to drive footfall to existing local businesses, and unlock major investment into local infrastructure. In Bedford, we believe a project like the one we are exploring could create 8,000 new full time jobs once in operation and facilitate significant infrastructure improvements. We are still many months away from deciding whether or not we would proceed with this potential project. Would you support a potential park and resort coming to this site?"

3.9 There were 6,047 respondents to survey question 8. A total of 92.5% of respondents said they support the prospect of a potential park on this site with 3.7% opposing the idea and 3.75% indicating that they were not sure. 5,091 comments were also submitted and included comments on the following themes:

- Benefits to Bedford and the UK.
- Support for job creation and wider economic impact, including mentions of tourism.

- Supportive comments about the proposal and UDX.
- Ideas for rides, themes or attractions at the proposed park.
- Impact on the local area, including traffic, noise and the environment.
- Negative comments about the proposal, such as requesting the potential theme park is not built.

3.10 Whilst UDX fully respects comments from those who did not support the Proposed Development, it is recognised that the vast majority of people who responded are in favour. UDX also noted that a number of respondents who were familiar with its operations elsewhere took the opportunity to comment on their views on UDX as an operator, including:

"I am incredibly excited that Universal is investigating the possibility of a new resort in the UK. The Universal Orlando resort is one of my favourite places in the world and I honestly thought we'd never see a park of this scale and quality being potentially considered here."

"I hope this goes ahead. The Universal Resort in Orlando is outstanding and to have a resort in the UK would be incredible. I hope this project happens."

"Very excited to see this project come to fruition, and would support it 100%. The UK is long overdue a world-class theme park of this scale and calibre and the Bedford location is ideal for maximum catchment and accessibility from all parts of the UK."

"I think it's an incredible idea, it'll open up passions for children they never knew they had. Whether it be a passion for riding on rollercoasters, a realisation of what they want to do when they grow up (engineering, or working within such an incredible establishment)."

"Having been to Universal in Florida the thought of it coming to the UK anywhere is just too exciting a prospect. It could encourage us to think big and emphasise importance of quality."

"Having visited universal Orlando on many occasions, I know the people of Britain would be blown away with the detail, care, world class rides and hospitality universal provide which is nothing like we have in the UK so far."

3.11 UDX also noted the strong positive sentiment of many Bedford residents, including:

"I am Bedford born and bred, my father spent his entire life in Bedford, as did his parents. He worked in engineering ... and was one of the first to be made redundant ... when it was unheard of. I want Bedford to be worth visiting again for many reasons, work, fun, education and I believe that this opportunity you have will do that for the area."

"I hope it goes ahead and can use one of the lakes in the area. A great asset for Bedford and its road and rail links make it a very good location."

"With Universal coming to Bedford it will give the area a huge boost."

"Improving the general state of the country which rarely received this scale of investment for entertainment."

"Good luck and hope this project goes through. Thank you for considering our neighbourhood for such a massive undertaking."

"I fully support this proposal. I live in Kempston and would welcome such a boost to the local area."

"Extremely excited to think this could become a reality over the coming years and sincerely hope the project goes ahead. Bedfordians would welcome Universal parks with open arms."

"Please make it happen. The UK NEEDS Universal!!!"

- 3.12 UDX has been working closely with Bedford BC, the host local authority, to inform the EIA, and to develop the **Employment and Skills Plan (Document Reference 6.12.0)**, to make sure that the local population are well placed to benefit from the opportunities created by the Proposed Development. UDX will continue to work closely with Bedford BC as the detailed proposals are developed. This has included a number of topic-specific meetings with religious and community groups, blue light services and education and training providers. Further information is provided in the **Public Engagement Report (Document Reference 6.5.0)** and the **ES**.
- 3.13 UDX has been working with the IDB to develop a master plan that includes a comprehensive surface water plan and ecological enhancement areas that meet the strategic objectives of the Bedfordshire and River Ivel Internal Drainage Board and the Forest of Marston Vale on behalf of the Marston Vale Surface Waters Group. This has resulted in the development of the **Drainage Strategy at Appendix 12.3 of the ES (Document Reference 4.12.3.0) Green Infrastructure Statement** which is provided in Appendix 1 of the DAS (**Document Reference 6.2.0**).
- 3.14 The road and rail elements of the Proposed Development have been developed in conjunction with the Promoters, including National Highways, Network Rail and EWR. DfT and National Highways have also been working collaboratively with UDX to develop the transport model to make sure that the traffic effects of the Proposed Development are properly understood and appropriately mitigated. Further information is provided in the **Public Engagement Report, ES and Appendix 5.1 of the ES: Transport Assessment (Document Reference 4.5.1.0)**.

- 3.15 The local authorities within the area (Bedford BC, Central Bedfordshire Council, Luton Borough Council, Milton Keynes City Council, North Northamptonshire Council and West Northamptonshire Council) are also very supportive of a UDX ERC on the Site and wrote an open letter to the Prime Minister stating that they would continue to work with UDX to maximise the benefits for the local community and to provide their unequivocal support in ensuring the investment is secured for the benefit of the whole community.
- 3.16 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 SOAPs. This has included sharing key information where relevant. These are provided at **Appendix 4** to this **Planning Statement**. The SOAPs are intended to assist MHCLG in understanding UDX's agreement with key stakeholders on the key issues when assessing the planning proposal.

4.0 SITE CONTEXT

- 4.1 This section provides a summary of the physical characteristics of the Site and its surrounding context, including policy allocations and designations. It also provides background to the selection of the site and why it was chosen as the location for a UDX ERC.
- 4.2 A plan of the land which the planning proposal relates is provided at the **Site Location Plan (Document Reference 1.6.0)**.

Scheme Context

- 4.3 UDX identified an opportunity to provide a new ERC in Europe and has been looking for a suitable site for some time. The UK is well-suited due to its temperate climate and good links with the rest of Europe, as well as a population with a strong connection to Universal parks, which millions of British residents visit each year. The new ERC will be a world class facility and will deliver a number of significant benefits to the local area, region and UK as a whole.
- 4.4 The scheme provides an overall contribution of £35 billion 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 UK as a whole.

Site Selection

- 4.5 There are five UDX theme park destinations throughout the world, in Orlando, Hollywood, Japan, Beijing and Singapore, as shown in Figure 1.



Figure 11 - UDX Global Map

- 4.6 **Chapter 4 of the ES: Alternatives (Volume 1) (Document Reference 2.4.0)** provides an overview of the reasonable alternatives considered.
- 4.7 The site selection process began in 2022. UDX worked with agents to identify suitable and available sites to identify a long list of potential sites in the UK. This long list was then refined based on a range of factors, including:
- good transport links for national and international visitors, including close proximity to a main train station and Main A road, as well as no more than a 2-hour drive from London;
 - site size greater than 200 acres (80.94ha), preferably in single ownership, to facilitate the Proposed Development;
 - site to be relatively flat to reduce requirements for levelling/profiling, and site shape that facilitates development; and
 - a host Local Authority that was supportive in principle, including support for planning to accommodate a theme park and resort development.
- 4.8 In addition, other technical and economic considerations were taken into account, including:
- suitability of the surrounding area for a theme park and resort development;
 - proximity of a site to London and suitable transport infrastructure;
 - adequate employment catchment;
 - presence of educational institutions to provide workforce training;
 - convenient access for domestic and international tourists; and
 - availability of land on commercially reasonable terms.
- 4.9 The chosen Site performed well against all criteria; no other suitable alternative sites were identified that satisfied all the requirements of UDX's criteria. The Site was chosen because it met the above requirements and it also had a number of other positive attributes, including that it was partly brownfield, being part of the former Kempston Hardwick brickworks, and was available for development. It is also not subject to any on-site environmental or landscape designations, other than a small part of the County Wildlife Site (CWS) which covers the former clay pits to the northern part of the Site, which will primarily remain an ecological area, and is not designated as Green Belt.
- 4.10 It is recognised that a different developer has previously given consideration to the development of a major theme park (known as the London Resort) in Swanscombe, Kent, and submitted a

Development Consent Order (DCO) application in 2020. The application for a DCO for the London Resort was withdrawn in 2022 following Natural England's intention to have the site designated as a Site of Special Scientific Interest. Given the statutory designation of the site as a Site of Special Scientific Interest, and due to viability concerns and economic reasons, the London Resort site was not considered a commercially reasonable alternative by UDX.

- 4.11 UDX identified Bedford as the ideal location because of its excellent transport links. The Site has convenient, fast rail links to London and London Luton Airport (and other UK airports by road/rail links). Both the Site and Bedford are well connected for travel from all parts of the UK. The EWR project also plans to deliver additional transport improvements locally, specifically improvements to the existing railway between Bletchley and Bedford. It is acknowledged that several London Airports have long-running plans for expansion that are at various stages of development. Although these further airport expansion plans benefit its accessibility, the Proposed Development does not rely on or is the trigger for any of these expansion plans.
- 4.12 This connectivity is discussed further in **Appendix 5.1 of the ES: Transport Assessment (Volume 3) (Document Reference 4.5.1.0)** and illustrated in the figures below.

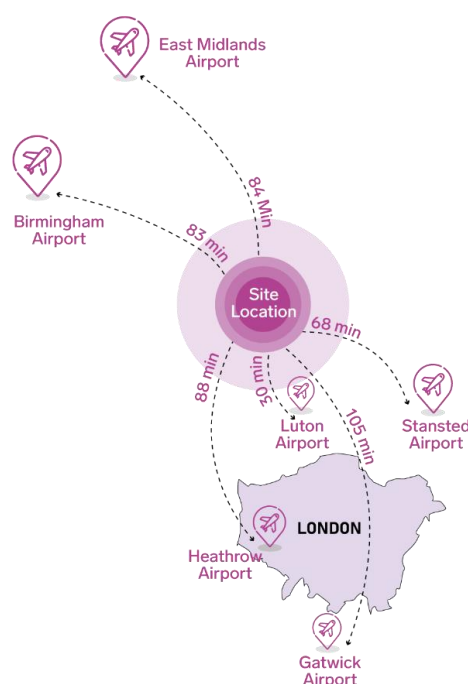


Figure 2 - Connectivity by Air

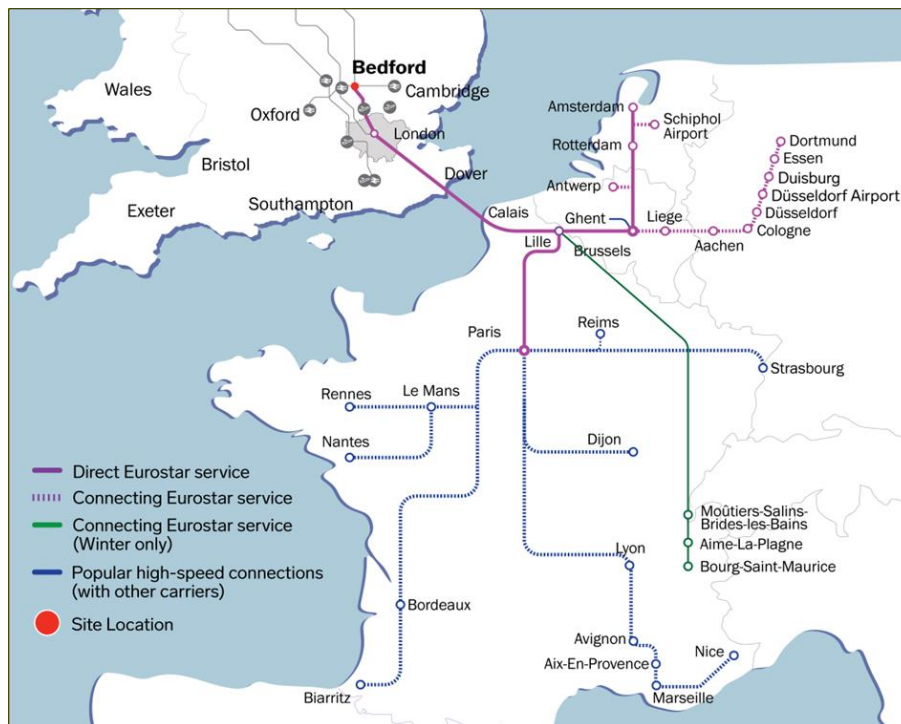


Figure 3 - Connectivity by Rail

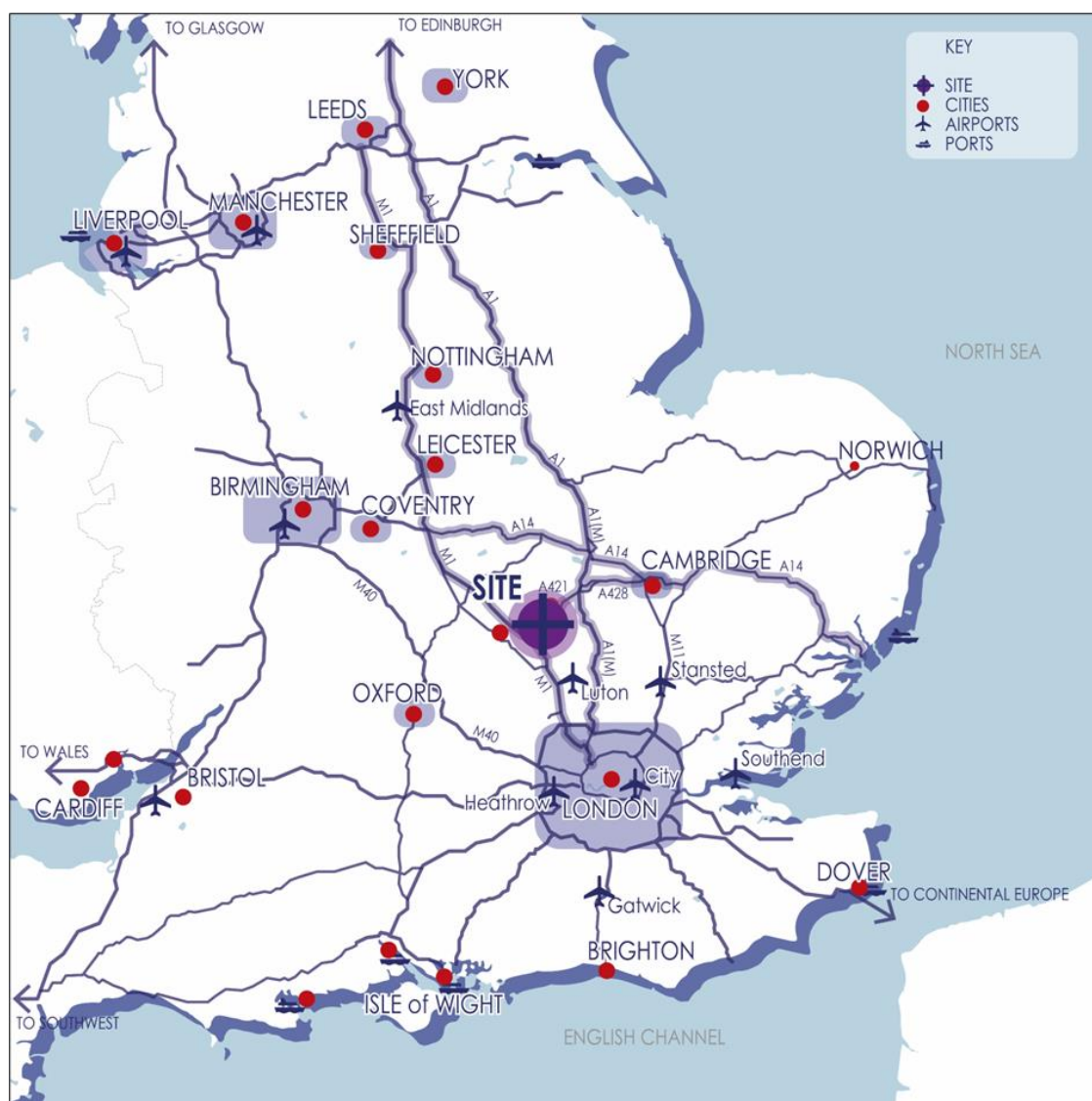


Figure 4 - Connectivity by Road

Site description and context

- 4.13 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).
- 4.14 **Core Zone** – the central portion of the Site comprising primarily agricultural fields, defined by a range of strong and gappy hedgerows, which is 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 Coronation Pits and the Kempston Court industrial area.

- 4.15 **Lake Zone** – the northernmost portion of the Site comprising the former Kempston Hardwick Brickworks (previously developed land) and partially flooded pits which is bounded to the west by the existing Marston Vale Railway Line, to the east by the Kempston Pits and the B530 (Amphill Road), to the south by Manor Road and to the north by drainage ponds adjacent to the A421.
- 4.16 **East Gateway Zone** – the eastern area of the Site comprising an existing forested area and a partially developed parcel bounded on the west by the B530 (Amphill 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 forested area to the north of the right of way. The East Gateway Zone adjoins the planned site of the new Wixams Rail Station, which is currently being implemented by Bedford BC and Network Rail. The Site does not overlap with any of the Wixams East Station site to the east of the existing tracks. This is further explained at the Planning History section in Table 3 below.
- 4.17 **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.

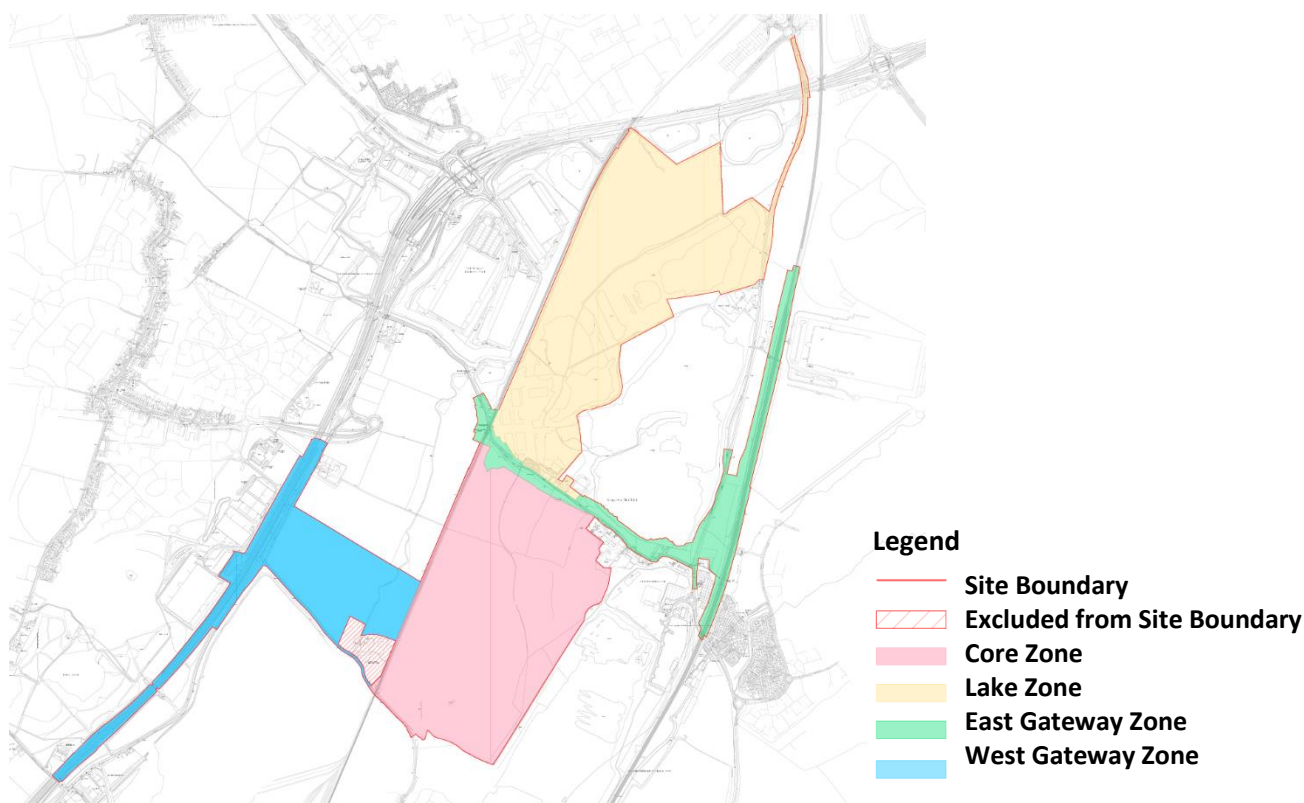


Figure 5 – Site Zones (extract from Zonal Plan 1.8.0, not to scale)

- 4.18 The surrounding context for the Site is reflective of several recently completed industrial and warehousing developments, energy and infrastructure developments to the south, west and north east of the Site and major residential development at Wixams and Stewartby located east and south of the Site respectively.

Designations and allocations

- 4.19 Figure 6 below presents Bedford Borough Policies Map (including all extant policies), relevant to the Site.

Bedford Borough Local Plan 2030 (adopted)

- 4.20 The adopted Bedford Borough Local Plan 2030 identifies the Site as just outside of the Urban Settlement Boundary. The northern portion of the Site is identified as Green Infrastructure Network Opportunity Zone 4, while the area comprising the existing water bodies is identified as a Country Wildlife Site (CWS) – 42S.

Allocations and Designations Local Plan July 2013 (saved policies 15 January 2020)

- 4.21 Saved policies of the Allocations and Designations Local Plan 2013 also identifies a northern portion of the Site as Green Infrastructure Network Opportunity Zone 4 Bedford to Milton Keynes – Marston Vale.

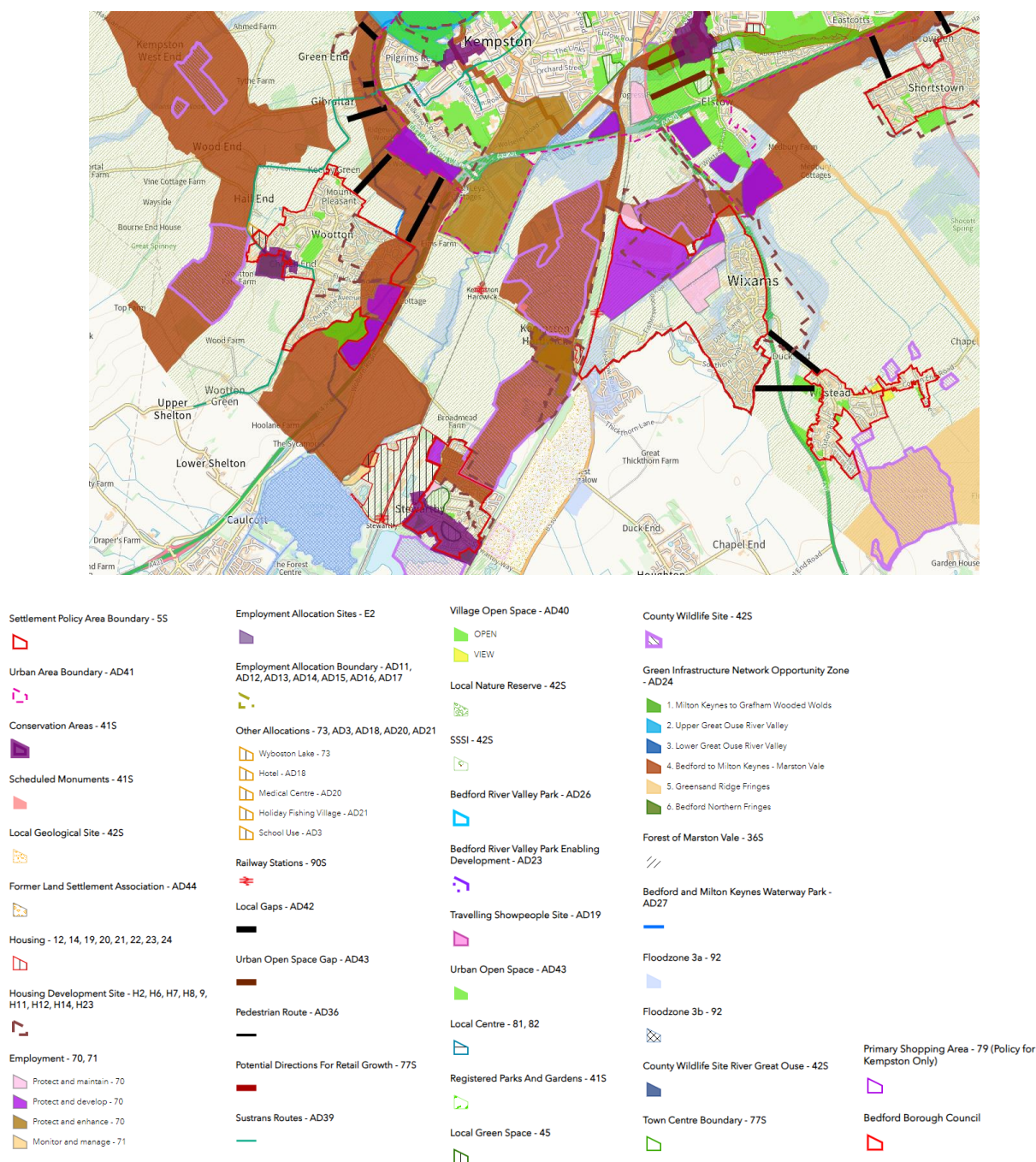


Figure 6 | Bedford Borough Policies Map (including all extant policies)

4.22 The Site is located in the adopted Local Plan within the wider Forest of Marston Vale allocation, 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, so transforming perceptions of the area, and transforming social and economic prospects.

- 4.23 Historic England's mapping service identifies a Scheduled Monument, the Kempston Hardwick moated site directly to the east of the Site to the north of Manor Road. The Site does not contain any listed buildings, however there are two identified within 1km of the Site, Sailors Bridge Cottages, a Grade II listed building approximately 615m to the north west of the Site and two kilns and four chimneys at the Stewartby Brickworks, approximately 840m south of the Site. **Chapter 10 of the ES: Cultural Heritage (Document Reference 2.10.0)** provides full details of designated and non-designated heritage assets in proximity to the Site.
- 4.24 The Site and surrounding area does not contain any further environmental designations. The closest Site of Special Scientific Interest (SSSI) to the Site lies 2.3km to the southeast (Kings Wood and Glebe Meadows, Houghton Conquest SSSI). The SSSI boundary also overlaps with the Kingswood and Glebe Meadows, Houghton Conquest Local Nature Reserve (LNR). Further information on the ecological context is provided in **Chapter 6 of the ES: Ecology and Nature Conservation (Document Reference 2.6.0)**.
- 4.25 The Bedford BC policies map identifies a portion of the Site as a CWS. CWSs are identified as locally important sites that are non-statutory.
- 4.26 **Chapter 12 of the ES: Water Resources (Document Reference 2.12.0)** confirms that based on the Environment Agency Flood Map for Planning, the majority of the Site is located in Flood Zone 1 (low probability). The Lake Zone has a small area to the northern periphery located in Flood Zone 2 (medium probability) and Flood Zone 3 (high probability) adjacent to the Elstow Brook and A421.
- 4.27 The parish of Stewartby, which includes a significant proportion of the Site, was designated as a Neighbourhood Area in November 2013. Since then, there has been no made Neighbourhood Plan or draft Neighbourhood Plan submitted.
- 4.28 There are no Air Quality Management Areas (AQMA) within close proximity of the Site. The nearest AQMA is the Town Centre AQMA which lies approximately 2.3km north of the Site on the A5141 Ampthill Road, and Central Bedfordshire Council's AQMA No.3 Ampthill at approximately 5km to the south on the B530.
- 4.29 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.

- 4.30 The Site contains identified areas of archaeological interest, principally on the southern portion of the Site and along Manor Road, which have been designated based on the potential for below-ground archaeological remains.
- 4.31 The DEFRA Predictive Best and Most Versatile (BMV) Land Map shows the Site as mainly non-agricultural and urban use, with a small portion to the far south-west of the site identified as moderate to low potential for BMV land. The Natural England provisional ALC 1:250 000 scale map (South-East) shows the area as mainly non-agricultural with a smaller area of Grade 3 quality land to the far south-west of the Site. **Chapter 11 of the ES: Ground Conditions, Soils and Agricultural Land (Document Reference 2.11.0)** confirms that there is approximately 12ha of Grade 3a (BMV) present within the Core Zone, although the assessment takes a worse case baseline of 43ha of BMV agricultural land on the basis that land to the north of the Site in the Lake Zone has not been surveyed and so may be BMV.
- 4.32 The nearest residential properties to the Site lie on Manor Road (partly within the Site itself); an isolated single house, on the southern boundary of the Site on Broadmead Road; and 200m to the south of the Site, in the northern parts of Stewartby.
- 4.33 The north-west corner of the Lake Zone falls partly within an HSE consultation zone due to an LNG storage facility that is situated at the ASDA distribution centre on the west of the Marston Vale Railway Line. UDX has engaged with HSE to understand the limitations that apply within these zones and has proposed **Design Standards** (Design Standard LZ2.1 and LZ2.2) (**Document Reference 6.3.0**) to ensure that HSE's land use planning guidance is adhered to. HSE is in agreement with the proposed Design Standards and the result of this is set out in the Summaries of Agreed Position (SOAP) provided at Appendix 4 of this Planning Statement.

[Draft Bedford Borough Local Plan 2040 \(examination draft\)](#)

- 4.34 The emerging Draft Bedford Local Plan 2040 (currently under examination) identifies the land at Kempston Hardwick, including the Site, as allocated for a new settlement with the Site designated for housing and employment. The Local Plan examination was officially paused in March 2024, to enable the Council to work with National Highways to develop a solution which addressed their concerns about the ability of the road infrastructure to cope with the scale of planned

development. Bedford BC's letter to the Inspector of March 2024³ stated that *"Universal Destinations & Experiences has chosen Bedford as their preferred European location for a theme park resort and associated housing. The site, if it should go ahead, is located within the proposed Kempston Hardwick new settlement area (Policy HOU14). The idea is not currently a firm proposal, and detailed work is being undertaken to assist Universal in making a "go / no go" decision to pursue the project. As part of this work, a detailed VISSIM highway model of the A421 covering its route from the M1 to the A1 has been prepared, and this has been shared with the Council. This is hugely beneficial as it offers the opportunity for a significant saving in time for the work we need to undertake with National Highways (NH) to overcome their objections."*

4.35 Given the outstanding issues and feedback to date from the Inspector, it is considered that limited weight can be given to the emerging Local Plan in accordance with the tests outlined in paragraph 49 of the NPPF.

4.36 Notwithstanding the draft state of the Local Plan, it is considered that future housing and employment growth is best addressed through the Local Plan process, which is able to take a holistic approach to planning for the needs of the wider area. If planning permission is granted for the Proposed Development, and an investment decision made to proceed, it would be expected that the Local Plan process would consider the implications of the project on the future growth of the area.

Relevant Planning History

4.37 The Site has been the subject of several planning permissions and a recent application for major development which was withdrawn following the developer no longer wishing to pursue the application after it put the Site on the market and the sale to the Promoter. There is significant information available about the Site which was published as part of this application and has been taken into account by the Promoters where appropriate to inform their understanding of the Site.

3

<https://edrms.bedford.gov.uk/OpenDocument.aspx?id=lz0CysNj%2boFReFI3%2boZtnQ%3d%3d&name=ED81%20Bedford%20BC%20letter%20to%20Inspector%20240307.pdf>

4.38 The most relevant planning history to this proposal is captured in **Table 3** below:

Table 3 – Relevant Planning History

APPLICATION REFERENCE	LOCATION	DESCRIPTION OF DEVELOPMENT	DECISION AND DATE
Awaiting application reference	Land at and adjacent to a disused mine at Kempston Hardwick	Remedial works to stabilise a slope slip – prior approval application for Permitted Development (Part 17, Class C of the GPDO) PD prior approval application	Awaiting decision (submitted June 2025)
99/01645/OUT	Land At Elstow Storage Depot Midland Mainline Railway Bedford Road Wilstead Bedfordshire	Built development consisting of building and engineering works for a mixed use development of residential, employment, retail (A1, A2, A3) leisure and community uses, open space and associated uses together with supporting infrastructure (roads, paths, cycleways, pumping stations, electricity substations), public transport, interchange and car parking. This is the original Outline permission for east Wixams railway station, and its boundary does not overlap with the Site boundary.	Approved – June 2006
11/01380/M73	Land At Elstow Storage Depot Midland Mainline Railway Bedford Road Wilstead Bedfordshire	99/01645/OUT Built development consisting of building and engineering works for a mixed use development of residential, employment, retail (A1, A2, A3) leisure and community uses, open space and associated uses together with supporting infrastructure (roads, paths, cycleways, pumping stations, electricity substations), public transport, interchange and car parking (all matters reserved except access). Application for variation of condition 20 (i) restriction on floorspace of foodstore.	Approved – July 2012

		This is the revised Outline permission for east Wixams railway station, and its boundary does not overlap with the Site boundary.	
22/01933/MAR	Land For Railway Station Meadow Road Wixams Bedfordshire	Approval of reserved matters (access, appearance, landscaping, layout and scale) for the construction of a new railway station building, car parking facilities associated with the station, EV charging units and other associated works and infrastructure pursuant to outline planning permission 11/01380/M73 (99/01645/OUT as amended). This is the original Reserved Matters permission for east Wixams railway station, and its boundary does not overlap with the Site boundary.	Approved – February 2023
22/01954/MDC3	Land For Railway Station, Meadow Road, Wixams, Bedfordshire	Construction of two railway platforms, footbridge and pedestrian lifts associated with a new railway station. Construction of facilities ancillary to the station including lighting, drainage, utilities and other services, boundary treatment and other associated works.	Approved – February 2023
23/02136/M73	Land For Railway Station, Meadow Road, Wixams, Bedfordshire	Approval of reserved matters (access, appearance, landscaping, layout and scale) for the construction of a new railway station building, car parking facilities associated with the station, EV charging units and other associated works and infrastructure pursuant to Major S73 Variation of Conditions permission (11/01380/M73) to the permitted Outline application (99/01645/OUT as amended), including variation of condition 1 (approved plans) of approved	Approved – March 2024

		<p>planning permission (22/01933/MAR) to enable an increase to the height of the approved clock tower and relocation of station building at Land For Railway Station, Meadow Road, Wixams.</p> <p>This is the revised Reserved Matters permission for east Wixams railway station, and its boundary does not overlap with the Site boundary.</p>	
23/02629/MDC3	Land For Railway Station, Meadow Road, Wixams, Bedfordshire	Construction of two railway platforms, two footbridges, and two pedestrian lifts and ancillary facilities to the station including lighting, drainage, utilities and other services, boundary treatment, landscaping, and associated works for the new railway station at Land for railway station, Meadow Road, Wixams, Bedfordshire	Approved – March 2024
18/02940/EIA	Land Between Broadmead Road and Manor Road, Stewartby, Ampthill Road, Kempston Hardwick and Woburn Road, Wootton	Outline application with all matters reserved except access, for a commercial and industrial development providing up to 780,379 sqm of floorspace for B1, B2 and B8 uses, and ancillary service uses (A1, A3, A4 & A5) and associated infrastructure including open space and landscaping.	Withdrawn - February 2024
23/00135/MAF	Hanson Brick, Manor Road, Kempston Hardwick, Bedford Bedfordshire MK43 9NR	Temporary Change of Use (up to two years) of land for the storage of prefabricated building components, the siting of ancillary security, welfare and office buildings, the creation of a new access and the erection of fence with hedging and trees along Manor Road following removal of boundary wall and hedge.	Application disposed of – April 2024
18/03223/M73A	The Old Brickworks, Manor Road, Kempston Hardwick,	Use of land for the storage of prefabricated building components and siting of	Refused - April 2021

	Bedford Bedfordshire MK43 9NR	associated security, welfare, and office buildings (Development already carried out). Erection of fence along Manor Road following removal of boundary wall and hedge.	
11/01356/S73W M	Coronation Pit Broadmead Road Stewartby Bedfordshire	Removal of condition 2 and variation of conditions 10 and 15 of planning permission 22/2007 to allow an amended restoration and aftercare scheme to be implemented.	Awaiting decision.
07/03001/COM Bedfordshire CC reference BC/CM/2007/22	Coronation Pit Broadmead Road Stewartby Bedfordshire	Variation of condition 17 and consequential changes to conditions 1, 5, 6 and 7 of Planning approval 10/2004 to modify the approved restoration scheme and details for protection of the aquicludes and aftercare of the restored land.	Approved - June 2008.
02/00492/COM Bedfordshire CC reference BC/CM/2002/06	Wootton Broadmead, Broadmead Road Stewartby Bedford MK43 9NA	Brick factory with ancillary storage and operational areas.	Refused - June 2002
00/00624/COM Bedfordshire CC reference BC/CM/2000/05	Kempston Hardwick Brickworks, Manor Road, Kempston Hardwick, Bedford MK43 9NR	Application under the Environment Act 1995 for the review of conditions attached to the extant planning permission/s for mineral extraction and restoration.	Decided. BC/CM/2000/05 was approved on 6 March 2001 and 00/00624/COM was disposed of February 2010
00/00625/COM Bedfordshire CC reference BC/CM/2000/06	Wootton Broadmead, Broadmead Road, Stewartby. Bedford MK43 9NA	Application under the Environment Act 1995 for the review of conditions attached to the extant planning permission/s for mineral extraction and restoration.	Application disposed of: Date N/A
04/02110/COM Bedfordshire CC reference BC/CM/2004/26	Kempston Pit (Part) Manor Road Kempston Hardwick Bedford	Processing in situ demolition waste to produce suitable fill and recycled material for slope stabilisation at Kempston Hardwick Pit and export, and extraction of clay and overburden for use in stabilisation.	Application withdrawn by applicant – 10 July 2007

00/00619/COM Bedfordshire CC reference BC/CM/2000/10	Kempston Hardwick Pit, Kempston Rural, Marston Vale, Bedfordshire	Application under the Environment Act 1995 for the review of conditions attached to the extant planning permission/s for mineral extraction and restoration.	Approved – 8 August 2001
1913/9/2	Northern Half of the Brickworks	Minerals Permission for the extraction of Oxford Clay	Approved – 31 July 1952, Valid Consent until 2042
4/1980	Southern Half of the Brickworks (South of Manor Road)	Minerals Permission for the extraction of Oxford Clay	Approved – 7 July 1980, Valid Consent until 2042

Kempston Hardwick Slope Stabilisation

- 4.39 The planning history includes a prior approval application for remedial works to stabilise a slope slip at Kempston Hardwick, for the purposes of ensuring the safety of the surface of the land at and adjacent to a disused mine. These works are considered Permitted Development, under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ('the GPDO'), Schedule 2, Part 17, Class C. This Permitted Development right is subject to the prior approval of the mineral planning authority. An application for prior approval was submitted to Bedford BC in June 2025 and is awaiting a decision. The site boundary of the prior approval application includes a portion of the Lake Zone, along with two neighbouring parcels of land which sit outside the Proposed Development's Site boundary.
- 4.40 It is proposed that conditions be placed on any planning permission granted for the Proposed Development (**Proposed Conditions, Document Reference 1.5.0**), which would:
1. allow development pursuant to any prior approval either granted or for which an application has been submitted prior to the date of the SDO, to be undertaken to the extent permitted by the GPDO and the prior approval; and
 2. allow for subsequent development at the Site, that benefits from Permitted Development, to be undertaken to the extent permitted by the GPDO.
- 4.41 Accordingly, the remedial works to stabilise the slope slip would continue to be permitted by the GPDO.

Wixams railway station

- 4.42 The planning history for the Wixams railway station is set out in Table 4. As set out in the ES Appendix 0.1 Glossary and Acronyms (**Document Reference 4.0.1.0**), this planning proposal uses the following terms when describing works at Wixams railway station:

- Wixams East Station – means the rail development authorised by outline planning permission 11/01380/M73 dated 6 July 2012 and reserved matters approval 23/02136/M73 dated 27 March 2024, comprising the construction of a new railway station building, car parking facilities associated with the station, electric vehicle charging units and other associated works and infrastructure at land at Meadow Road, Wixams.
- Wixams Rail Station – means the portion of Rail-related development, as described in Appendix 2.4: Description of Development for EIA and Examples (Volume 3) located in the East Gateway Zone between the eastern boundary of the adopted highway for Ampthill Road and the eastern boundary of the railway undertaker’s operational land on the Midland Main Railway Line.
- Full Wixams Rail Station – the final full configuration of Wixams Station including both the Wixams Rail Station and Wixams East Station

Table 4 – Relevant Planning History

Track infrastructure of Wixams railway station	Station building and eastern plaza element of Wixams railway station
Full planning permission (reference 22/01954/MDC3) dated 23 February 2023	Outline permission (reference 99/01645/OUT) dated 2 June 2006
Full planning permission (reference 23/02629/MDC3) dated 27 March 2024 (“S73 Full Permission”)	Outline permission (reference 11/01380/M73) dated 6 July 2012 (“S73 Outline Permission”)
Not used	Reserved matters approval (reference 22/01933/MAR) dated 23 February 2023
Not used	Reserved matters approval (reference 23/02136/M73) dated 27 March 2024 (“S73 RMA”)

4.43 The extant proposals for the Wixams railway station are divided into two elements: track infrastructure and the station building and eastern plaza element. It is understood that Network Rail either has implemented, or intends to implement, the following consents to deliver a two-platform station:

- Track infrastructure: the S73 Full Permission authorise the construction of Platform, Footbridge and Lift Elements. This permission relates to land that falls entirely within the Site.
- Station building and eastern plaza: the S73 Outline Permission and the S73 RMA together authorise the construction of a new station building amongst other works. These consents relate to land that falls outside of the Site.

4.44 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 S73 RMA, 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 S73 RMA (Wixams East Station) (which together comprise Full Wixams Rail Station).

Minerals consents

4.45 The planning history also includes various consents for the extraction of minerals and subsequent restoration. These permissions were granted by the former Bedfordshire County Council and not all of the permissions are available, either electronically or in hard copy. In summary, large areas of the Site were extensively worked for minerals extraction.

4.46 There are the following mineral permissions which overlap with the Site boundary:

- Coronation Pit: permission reference 07/03001/COM Bedfordshire CC reference BC/CM/2007/22 (the “CP Permission”) – a slither of land within the Site, to the north of the Stewartby residential development, overlaps with the CP Permission;
- Kempston Hardwick (South): permission reference 00/00619/COM Bedfordshire CC reference BC/CM/2000/10 (the “KHS Permission”) – there is a small overlap along Manor Road;
- Kempston Hardwick (North): permission reference 00/00624/COM Bedfordshire CC reference BC/CM/2000/05 (the “KHN Permission”) – the overlap covers nearly all of the Lake Zone; and

- Wootton Broadmead: permission reference 00/00625/COM Bedfordshire CC reference BC/CM/2000/06 (the “WB Permission”) – this overlaps with all of the Core Zone.

4.47 Taking each in turn:

CP Permission

4.48 The site subject to the CP Permission is divided into zones 1, 2 and 3. Mineral extraction can no longer take place within any of these zones. There are no restoration conditions attached to the CP permission which relate to zones 1 and 3. There are restoration conditions which relate to zone 2 and it is understood that the owner of that site is in discussions with Bedford BC regarding a revised restoration and aftercare scheme. The site plan for the CP Permission is not clear but from reviewing the position on the site, it appears that no mineral extraction took place on the area of overlap between the CP Permission and the Site boundary. Therefore, it is reasonably likely that such overlapped area falls within zone 3 and there are no restoration conditions relating to that area.

KHS Permission

4.49 The KHS Permission no longer permits mineral extraction and, as such, carrying out development pursuant to any planning permission granted on the Site would not prejudice any mineral extraction. An historic enforcement notice was issued in March 2006 regarding the restoration-related conditions but, as far as UDX is aware, no further action has been taken by Bedford BC. In any event, from reviewing the position on the site, it appears that no mineral extraction took place on the area of overlap between the KHS Permission and the Site boundary. Therefore, it is unlikely that any restoration would be required.

KHN Permission

4.50 Mineral extraction pursuant to the KHN Permission appeared to cease in 1999 and the restoration conditions no longer appear to be enforceable. Accordingly, if planning permission for the Proposed Development was granted, while carrying out the Proposed Development on the Lake Zone would not prejudice any mineral extraction, the Proposed Development would render it impossible to comply with any restoration conditions to the extent that they remain enforceable.

WB Permission

4.51 Neither Bedford BC nor Central Bedfordshire Council could locate a copy of this permission. In any event, the site subject to the WB Permission is currently being used for agriculture and, as such, it

appears that either the WB Permission was not implemented or, if it was, the site has since been restored, and the WB Permission is unlikely to be relevant.

East West Rail (EWR)

Transport and Works Act Order

4.52 East West Rail Company (EWR Co.) is delivering EWR in three 'connection stages'. These are:

- Connection Stage 1: Delivering improvements to existing rail infrastructure between Oxford and Milton Keynes Central via Bletchley;
- Connection Stage 2: Delivering improvements to existing rail infrastructure between Bletchley and Bedford; and
- Connection Stage 3: Delivering a new rail line between Bedford and Cambridge.

4.53 The Network Rail (East West Rail) (Bicester to Bedford Improvements) Order 2020 was made pursuant to the Transport and Works Act 1992 (TWAo) on 4th February 2020 and came into force on 25th February 2020.

4.54 There is a small degree of overlap between the Site and the TWAo boundary in the area the existing level crossing on Manor Road.

4.55 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 (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.

EWR Safeguarding Directions

- 4.56 EWR safeguarding directions, for the land required for the proposed EWR project, were issued and came into force on 14 November 2024, as means to ensure that the land required for the EWR project is protected from conflicting development. Guidance notes have been published alongside the safeguarding directions, which confirm that the relevant planning authorities must consult with EWR Co. on any relevant planning application coming forward that includes development within the safeguarded area. It should be noted that the plans issued with the safeguarding direction include small areas beyond the railway tracks which extend into the Site, although it is not clear what the purpose of these areas are. The presence of the safeguarding direction does not prevent any decision maker from making a decision which is inconsistent with it, merely that EWR Co. need to be consulted, so that they can provide comment.
- 4.57 It is also important to note that the safeguarding direction only applies to decisions on applications for planning permission by Local Planning Authorities, not decisions by the Secretary of State, and so there is no formal requirement for decisions to grant planning permission by a Secretary of State to comply with it.
- 4.58 It should also be noted that since acquisition of the Site, UDX has also actively engaged with EWR Co. in respect of its proposals. As a result, the planning proposal includes land to be safeguarded for a railway station for EWR Co. The Proposed Development therefore does not prejudice the delivery of EWR in any way and provides for it, should it come forward in the future, although it is not reliant on it.

EWR Non-Statutory Consultation

- 4.59 EWR Co. carried out a non-statutory consultation to deliver Connection Stage 3, which it intends to obtain consent via a Development Consent Order (DCO). UDX made strong objections to EWR's consultation, on the basis that the plans were not consistent with its proposals. A copy of the representation is provided at **Appendix 7**.
- 4.60 Whilst a material consideration, at this stage the EWR non-statutory consultation cannot be afforded much, if any, weight in the determination of whether planning permission should be granted for UDX's proposals because:
- (a) The EWR non-statutory consultation options are at the very earliest stage.
 - (b) EWR Co. completely fails to take into account UDX's proposals, but EWR has said that these will need to be considered.

(c) There is therefore no certainty as to the nature and extent of the final proposals for which EWR Co. will ultimately seek DCO powers or that having secured those powers they will be exercised and if so in what timeframe.

(d) To the extent that a joint approach is not agreed between UDX and EWR Co., UDX will have no choice but to formally object to EWR's proposals at the statutory consultation stage and unless those objections are resolved to UDX's satisfaction beforehand they will need to be resolved at the examination into the EWR Co. DCO.

5.0 PROPOSED DEVELOPMENT

- 5.1 The Proposed Development comprises an ERC and utilities, road and rail-related infrastructure to support the ERC across the Site, together with the use of land and operations necessary to support construction. This section of the Planning Statement 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: Description of the Proposed Development (Document Reference 2.2.0)**.

Land to which the Proposed Development relates

- 5.2 Any planning permission granted would be located within the area shown outlined in red on the **Site Location Plan (Document Reference 1.6.0)**.

Plans

- 5.3 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 roadway access points with 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, such as where certain issues are permitted and access:
 - Entertainment Resort Complex Land Use – identifies the geographical extent of the ERC
 - Access and Roadways – shows the proposed roadway links and access points, including limits of deviation
 - Active Travel – shows active travel connections, comprising walking and cycling, including limits of deviation
 - Core Zone Transport Hub – identifies a location where rail-related development may be provided
 - Utility Compound – identifies the location and maximum geographical extent of the Utility Compound
 - East West Rail Safeguarded Land – showing land to be safeguarded for EWR

Land Use Limitations Schedule

- 5.4 The **Land Use Limitations (Document Reference 1.17.0)** describes in words where certain components of development can be located, with reference to the Zonal Plan and the Parameter Plans. 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 and the area shown on the Core Zone Transport Hub Plan.

Uses for which planning permission is granted

- 5.5 Any planning permission granted would permit a range of uses within the ERC together with utilities, roads and rail-related development, as well as the use of land and operations necessary to support construction. The proposed uses and operations are set out in the **Description of Development (Document Reference 1.9.0)** and replicated below.

Table 5: Summary of Proposed Development

DEVELOPMENT COMPONENT	PROPOSED DESCRIPTION OF DEVELOPMENT FOR WHICH PLANNING PERMISSION WOULD BE GRANTED (AUTHORISED DEVELOPMENT)
Entertainment Resort Complex	<ul style="list-style-type: none"> - Theme park(s), amusement park(s) and/or water park(s), including indoor and outdoor: <ul style="list-style-type: none"> o Rides, attractions, games and pools o Events spaces o Parades, shows and displays. - Visitor accommodation, including hotels, camping and caravanning. - Vehicle hire facilities. - Indoor and outdoor entertainment venues, including: <ul style="list-style-type: none"> 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. <p>Associated services and uses for any operational or administrative functions (Entertainment Resort Complex support), including:</p> <ul style="list-style-type: none"> - 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.

	<ul style="list-style-type: none"> - 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. - 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, sorting and collection facilities. - Communications infrastructure, including towers, antennas, small wireless facilities, two-way radio, distributed antenna system and other similar communications facilities. <p>Utility generation, storage, collection, treatment, and processing facilities associated with the Entertainment Resort Complex, including:</p> <ul style="list-style-type: none"> - Electricity generation and storage apparatus, including renewable generation (including solar panels and battery storage) and backup generation. - Water collection, treatment, and processing facilities and storage. - On-site energy centre(s) providing source of networked heat and cooling, including heat pumps, electric and gas boilers, thermal storage and electric chillers. - Associated buildings, structures, equipment, and metering. <p>Vehicle and cycle parking, maintenance and servicing and transportation hubs, including:</p> <ul style="list-style-type: none"> - 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 and fuelling vehicles, including electric and other charging facilities. <p>Access routes and circulation spaces, including:</p> <ul style="list-style-type: none"> - 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. <p>Landscaping, including:</p> <ul style="list-style-type: none"> - 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.
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	<ul style="list-style-type: none"> - Public art. - Visitor facilities and infrastructure, including seating, kiosks, ticketing points, ticket machines, ticket barriers, turnstile structures, booths, stalls, canopies and other ancillary infrastructure. - Street furniture. - 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	<p>Utility infrastructure provided in connection with the Entertainment Resort Complex, Roads and/or Rail-related development, including:</p> <ul style="list-style-type: none"> - Electricity distribution infrastructure, including substations, transformers and cables. - Water (potable and non-potable) and wastewater (surface and foul) infrastructure, including pipes, pumping stations, treatment facilities, 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	<p>Roads, routes and associated infrastructure, including:</p> <ul style="list-style-type: none"> - 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: <ul style="list-style-type: none"> o Structures associated with signage, including gantries. o Lighting including floodlighting. o Noise attenuation. o Gates, fences, walls, retaining walls, and other means of enclosure. o Traffic control devices. o Security infrastructure. o Public art. o Street furniture. o Wildlife crossing structures. o Trees, shrubs, grassland, hedge planting and verges. o Ecological mitigation, habitat, and biodiversity enhancement. o Drainage and attenuation works, including swales, channels, fountains, lakes, lagoons, ponds, and watercourses.

Rail-related development	<p>Railway station, railway crossings and transportation hubs with associated services and infrastructure, including:</p> <ul style="list-style-type: none"> - 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. - Maintenance facilities. - Vehicle and cycle parking, maintenance and servicing and transportation hubs, including: <ul style="list-style-type: none"> o Covered and uncovered vehicle parking areas including multi storey car parks. o Vehicle drop off and pick up, including parking and associated infrastructure for buses, coaches, taxis, ride shares and service vehicles. o Facilities for servicing, maintaining, valeting and fuelling vehicles, including electric and other charging facilities. - Roads and vehicular bridges. - Pedestrian and cycle access and infrastructure, including bridges, underpasses, walkways (covered, uncovered and moving), stairs, ramps, escalators and lifts. - Traffic signals. - Landscaping, including: <ul style="list-style-type: none"> o Structures associated with signage, including gantries. o Information boards and associated structures. o Lighting including floodlighting. o Noise attenuation. o Gates, fences, walls, retaining walls, and other means of enclosure. o Traffic control devices. o Security infrastructure. o Public art. o 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. o Street furniture. o Wildlife crossing structures. o Trees, shrubs, grassland, hedge planting and verges. o Ecological mitigation, habitat, and biodiversity enhancement. o Drainage and attenuation works, including swales, channels, fountains, lakes, lagoons, ponds, and watercourses.
Construction	<p>Use of land necessary to support construction, including:</p> <ul style="list-style-type: none"> - Soil and spoil storage. - Construction compounds and storage. - Construction related buildings and structures, including offices, welfare facilities, medical facilities and temporary worker accommodation.

	<ul style="list-style-type: none"> - Storage of cement and other materials for use in construction, including mixing equipment, silos, above ground storage tanks, sand and aggregate storage. - 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. <p>Building, engineering or other operations, including:</p> <ul style="list-style-type: none"> - Soil and spoil removal. - Preparation of concrete and other materials for use in construction. - Erection, construction, 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, boreholes, 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, disconnect, reconnect, 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 closing 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.
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Alternative Development Scenario – Manor Road residential properties

- 5.6 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 as a cautious worst case scenario 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. The planning balance has however been undertaken on the basis that these properties remain in residential use. These areas are shown as the ERC Expansion Areas on the **Parameter Plan – Entertainment Resort Complex Land Use (Document Reference 1.10.0)**.

Minimum Development Programme (MDP)

- 5.7 As noted above, the proposed planning permission will authorise a broad range of uses and operations. UDX has committed (see the **Dependencies Table (Document Reference 1.19.0)**) to delivering the following components before the Grand Opening of the Theme Park, which constitute the material components of the Proposed Development and represent a significant investment.
- 5.8 The minimum development programme of the ERC is designed to accommodate 8.5M annual visitors and 55,000 visitors per peak day, consisting of:
- A "destination" (meaning "international" as opposed to "regional" or "local") Theme Park of at least 32.37 hectares in size (excluding guest parking) with an emphasis on highly immersive storytelling and theming with an international draw, focused on providing a first-class guest experience.
 - Dining and entertainment venues available to ticketed and non-ticketed visitors to the ERC.
 - Visitor accommodation with a minimum of 500 hotel rooms.
 - Associated services and uses for any operational or administrative functions, such as office buildings and warehouse/storage facilities.
 - Vehicles and cycle parking, including a minimum of 7,106 car parking spaces, 100 coach parking spaces, and 250 cycle spaces.

- Green infrastructure in the form of an environmental enhancement area to be provided at a minimum of 49.3 hectares.
- Active travel routes throughout the site, which will facilitate connections from the ERC to the surrounding active travel network.

5.9 Associated infrastructure necessary to support full buildout of the ERC (subject to the **Dependencies Table (Document Reference 6.18.0)** and the **Travel Plan (Document Reference 4.5.6.0)**), comprising:

- A new A421 Junction and dual carriageway access road.
- Realigned and upgraded Manor Road to a dual carriageway access road between Ampthill Road and the Marston Vale Railway Line.
- An expanded Wixams Rail Station.
- If the expanded Wixams Rail Station is provided, shuttle bus service between the expanded Wixams Rail Station and the Theme Park.

5.10 For the purposes of the conclusions in the planning balance at Section 9.0 of this Planning Statement, it has been assumed that this MDP would be delivered.

Planning Unit

5.11 Any planning permission granted would permit a range of uses within the ERC and the ERC Expansion Areas (as defined on the **Parameter Plan – Entertainment Resort Complex Land Use, Document Reference 1.10.0**) together with utilities, roads and rail-related development, as well as the use of land and operations necessary to support construction.

5.12 The ERC is a single composite mixed use development (including the ERC expansion areas if developed for ERC uses). Where reference is made below to changes of use and mixed uses within the ERC, this relates to the change of use between components, or a mix of component uses, within the ERC.

5.13 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. 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.

5.14 UDX will maintain unified control over the development as explained in paragraphs 1.18 to 1.27.

5.15 For the purposes of ongoing planning control, it is anticipated that any planning permission granted would include ongoing permission for the following:

- i. the change of use of a building, or part of a building, or other land forming part of the Site, from:
 - a. a use permitted within the ERC section of the description of development (see Table 5) and commenced pursuant to the planning permission, to another use permitted within the ERC; and
 - b. a use permitted within the utilities section of the description of development (see Table 5) and commenced pursuant to the planning permission, to another use permitted within the utilities section.
- ii. the maintenance, inspection, repair, adjustment, alteration, removal, demolition, clearance, refurbishment, reconstruction, replacement, redevelopment, reinstatement, extension, expansion and improvement of any part of the ERC and the Utilities referred to in Table 5.

5.16 In this regard, the whole ERC is considered to be one planning unit. The reasons for this are explained against the tests established under case law as follows:

Table 5a – Consideration of the Planning Unit

CONSIDERATION	HOW THE PROPOSED DEVELOPMENT MEETS THIS CONSIDERATION
Is there a single main purpose of the occupier's use of the land to which secondary activities are incidental or ancillary?	There is a single main purpose across the whole ERC whereby all proposed uses and development are required either to deliver or operate the ERC itself, or to provide associated services and uses for any operational or administrative functions (Entertainment Resort Complex support), or to ensure appropriate transport, access or utilities for the operation of the ERC.
Is there a variety of activities and it is not possible to say that one is incidental or ancillary to another?	There are a variety of activities taking place across the whole of the ERC. They are all required for the successful operation of the ERC and cannot be separated from one another.

Is there a composite use where the component activities fluctuate in their intensity from time to time, but the different activities are not confined within separate and physically distinct areas of land?	Within the ERC, uses and development will change depending on demands and needs at a particular point in time. For instance, media and film production facilities may be required at sporadic periods, and the rest of the time these facilities could be used event spaces or UDX shows. Within buildings, a number of different uses may also take place, for instance wardrobe facilities within the same buildings as a health centre and team member canteen. The use of buildings is also likely to vary seasonally, for instance during events such as Halloween Horror Nights. Whilst there are areas of the ERC where certain uses are limited to, the vast majority of uses are permitted across the whole of the ERC and so they are not separate and physically distinct areas where individual uses would be confined to.
Are there two or more physically separate and distinct areas that are occupied for substantially different and unrelated purposes	There are no parts of the ERC that are physically separate or distinct areas that are occupied for substantially different and unrelated purposes. The description of development ensures that all associated services and uses are provided in connection with the ERC only. Whilst the theme park(s), water park(s) and/or amusement park(s) itself will be within a separately ticketed area, the uses within the ERC are all functionally connected to it and will be under the unified control of UDX.

Operative and Controlling documents

5.17 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 would control the development which could come forward under any planning permission granted. Some of these have already been referred to above, and are as follows:

- Operative Documents
 - Site Location Plan
 - Primary Access Plan
- Controlling Documents
 - Zonal Plan
 - Parameter Plans (see list above)

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

5.18 Together the Operative and Controlling documents secure the mitigation required to address the impacts of the Proposed Development. Some of the key controls in relation to planning matters are explained in further detail below.

Design Standards

5.19 **Design Standards (Document Reference 6.3.0)** have been prepared to control the way in which development approved will come forward in a way which is consistent with the scheme assessed in the EIA. The Design Standards also contain controls on height and articulated skyline.

Proposed Conditions

5.20 In addition to the Design Standards, any planning permission granted would itself be subject to a series of conditions. Conditions may require for instance compliance with certain control documents or require submission of further detail in appropriate circumstances.

5.21 The proposed conditions are outlined in the **Proposed Conditions (Document Reference 1.5.0)**.

5.22 The **DAS (Document Reference 6.2.0)** explains the proposed post-decision approval process, with reference to the proposed conditions. 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. For example, for the Core Zone (which is to contain 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 Operative or Controlling Document), including those relating to height and the open sky component. It is proposed that design 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 and zone boundaries.

Floorspace limitations

- 5.23 Given the need for flexibility required for the theme park itself, and that the ES has assessed the maximum parameters, it is not proposed to limit the overall floorspace that can be provided in the Core Zone, although this will be limited by what can be physically accommodated on the Site in accordance with the Design Standards.
- 5.24 However, it is proposed that there would be limits on development of certain uses in the other three zones and the overall amount of standalone retail, as this is not UDX's operating concept. These limits are set out in Table MF01 in the **Design Standards (Document Reference 6.3.0)**.
- 5.25 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 in these areas could not be occupied by large format retail stores, which is not UDX's concept for the ERC. This is proposed to be controlled through the Design Standards.

Height limitations

- 5.26 The scale of the development will vary across the Site, depending on the components proposed and the part of the site in which it is located. **Design Standards (Document Reference 6.3.0)** have been developed to reflect the maximum permissible heights which are set out in Table MH01 and MH02 of 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 within specified areas (the Attraction Overlay Zone and Attraction Overlay Limit of Deviation) for any non-occupiable or non-habitable features where the destination is difficult to access or inaccessible, such as architectural or ornamental 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.
- 5.27 These maximum heights vary by, and within each, zone and are not repeated here, however the overall approach is to allow the tallest structures within the theme park area and the centre of the Lake Zone, with lower heights towards the Site perimeter and where required to address the relationship with sensitive receptors. The maximum height of a structure including non-occupiable

features, such as a rollercoaster, within the area of the Core Zone which allows the tallest structures, would be 115m above ground level (AGL).

5.28 The height strategy has sought to address effects on sensitive receptors through the following limitations:

- To the south of the Site, closest to Stewartby, buildings and structures within 100m of the Site boundary will be restricted to 10m (AGL) in height, unless the residential property in ERC expansion area D (the property at Broadmead Road) 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. Other than an isolated dwelling, the closest residential properties in this location are then another circa 200m from the Site boundary.
- Within 30m of the southern edge of Manor Road, the height of buildings and structures are limited to 10m (AGL), and then to 30m in height (AGL) for the next 45m, 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.
- Buildings and structures in the Lake Zone are limited to 75m (AGL) in height at the centre of the Site with maximum heights limited to 10m (AGL) along the access road, stepping up to 30m within the next 45m of the access road, with a substantial EEA around the Site perimeter and adjoining the County Wildlife Site.

5.29 As stated above, the height strategy also allows maximum heights to increase, within specified parameters, if the residential properties on Manor Road and Broadmead Road within the Site boundary are no longer occupied for residential use and have been demolished, or planning permission has been granted and implemented for a change to a non-residential use.

“Open sky concept” limitations

5.30 The maximum height parameters are proposed in combination with the “articulated skyline” Design Standard (Design 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)**.

[Environmental Controls Document](#)

5.31 The **Environmental Controls Document (Document Reference 6.16.0)** set out measures to avoid, reduce and mitigate impacts during construction and operation and secures the measures set out in other documents, including the Habitat Creation and Enhancement Plan (HCEP) and the Employment and Skills Plan and relied upon in the ES. The document includes controls relating to the following:

- delivery of a detailed HCEP including an EEA of a minimum of 49.3ha consisting of a range of habitat types, with approximate areas as specified in the Environmental Controls;
- ecological mitigation and enhancement measures, as well as measures to limit disturbance of the newly created habitats;
- measures for the establishment and maintenance of landscape and ecology;
- noise controls, including noise limits and monitoring;
- archaeological mitigation controls;
- land remediation controls;
- water, flood risk and drainage controls;
- surface water quality controls;
- SuDS maintenance and management controls;
- water conservation controls;
- carbon management controls;
- employment and skills controls;
- arboricultural controls; and
- sustainability controls.

[Transport Monitor and Manage Condition](#)

5.32 The Proposed Development is supported by a proposed Monitor and Manage Plan (M&MP) which is an appendix to the **Travel Plan (Document Reference 4.5.6.0)**.

5.33 Once operational, and to check the transport vision is coming forward in the manner anticipated, a monitor and manage system will be put in place, with regular monitoring of peak period traffic. In the event that vehicle movements during specific times at certain locations exceed the relevant

baseline number of vehicle movements, steps will be taken to address this, as set out in the proposed condition.

Employment and Skills Plan

5.34 The Proposed Development is supported by an **Employment and Skills Plan (Document Reference 6.12.0)**, which details employment and skills opportunities that will be provided at the Proposed Development. **Appendix 8** of this **Planning Statement** provides a summary of these measures.

5.35 The Employment and Skills Plan contains a series of commitments which will ensure that the Proposed Development realises the opportunities to deliver against the Government's Plan for Change, including:

- UDX will deliver at least 800 Creative Industries jobs at the ERC in its opening year and maintain this level for at least five years.
- UDX will commit to providing employee encounters and workplace experiences annually to local students in line with agreed benchmarks. Based on the expected level of employment at the Proposed Development this would equate to one thousand four hundred and thirty (1,430) students receiving employee encounters and four hundred (400) students receiving workplace experiences at the Theme Park year of maturity (2051).
- UDX will use commercially reasonable endeavours to target 20% of its workforce being drawn from individuals who were unemployed or economically inactive at the time of hire, including returners and retirees.
- UDX will provide a minimum of 50 paid internships annually from the second full year of operation, rising to 60 from the fifth full year of operation. Internships will be delivered for at least five years from the opening year.
- UDX will provide a minimum of 55 apprenticeships annually from the second full year of operation, rising to 70 by the fifth full year of operation.
- UDX will support 100 high-risk or socio-economically disadvantaged students annually by the second full year of operation. If the target is missed for two consecutive years, UDX will contribute £10,000 per student missed to a programme agreed with Bedford BC.
- UDX will run executive mentorship programmes for 15 participants annually, and a separate divisional mentoring programme for at least 50 participants annually.

- UDX will pay all employees at least the National Living Wage throughout construction and operation.
- UDX will ensure that employment impact is primarily felt across the six Bedfordshire local authorities, with a goal of having no more than 10 expatriate employees five years post-opening

Access

5.36 The Site and its surroundings 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 Line to the east and Marston Vale Railway Line to the west) providing opportunities for connection into the railway network. 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.

Proposed Highway Access

5.37 The vehicular access to the ERC would be via a new road junction on the A421, including a new eastbound off slip into the Site, a new westbound off slip into the Site and a new eastbound on slip away from the Site. Private vehicle access to Wixams East Station would be via Meadow Road to the east of the station, 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.

Wixams Rail Station

5.38 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 S73 RMA, meaning those existing consents for the eastern element remain unaffected. Should planning permission be granted for the Proposed Development, it is intended that Network Rail will construct the entire Full Wixams Rail Station, which includes the new Wixams Rail Station in the Proposed Development, together with the Wixams East Station pursuant to S73 Outline Permission and the S73 RMA.

EWR and Manor Road Bridge

5.39 Given the uncertainty about the timing for the operation of East West Rail to Bedford, and the uncertainty around the timing and location for a potential new station in the area of the Site, this project includes safeguarded land for the delivery of a new East West Rail station, as shown in **Parameter Plan – East West Rail Safeguarded Land (Document Reference 1.15.0)**. The Construction Phase EIA assessment includes allowances for the delivery of a new station in approximately this location, including specific allowance for traffic movements associated with the construction of the station. Similarly, the parameters for the Proposed Development allow for the operation of a new station on the safeguarded land and even if a station is not to be built in this location the assessment assumes that there will be trains associated with the works consented under the TWAO running on the Marston Vale Railway Line, the necessary connectivity (for both pedestrians and vehicles) to access this land parcel, and built development up to a maximum of 75m in height (either associated with a new station, or alternative permitted uses in the safeguarded area, in the event that the station does not come forward). Further detail on this is set out in **Chapter 18 of the ES: Cumulative Effects (Document Reference 2.18.0)**.

Non-Motorised Users

5.40 The Proposed Development also includes access by NMUs (non-motorised users). As well as delivering new active travel routes within the Site, the Proposed Development will deliver a new active travel route connecting the Site to Bedford and facilitate connections to other local settlements such as Stewartby (and further south Marston Moretaine) and Wixams to enable Bedford BC to deliver further improvements as part of their proper planning of the wider area.

5.41 Key elements of active travel infrastructure proposed include:

- a new shared footway and cycleway on the B530 Ampthill Rd north of a new access into the Lake Zone and linking to the B530/Interchange Way roundabout, creating a connection to the existing route into Bedford along the A5141.
- a foot and cycle bridge over the Midland Main 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.

Inclusive Access

Theme Park

5.42 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 and will be secured through compliance with the Disability Discrimination Act (1995) (DDA). 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 ERC 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.

5.43 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 a phone app in place to provide more accessibility information, including ride usability requirements.

5.44 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.

Wixams Rail Station

5.45 The station facilities, which will be brought forward by the DfT, will be designed to be fully accessible to all groups in accordance with the requirements of the DDA.

Construction Access

5.46 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 set routes illustrated in the Outline Construction Traffic Management Plan (OCTMP) provided in Section 3.3. of the Outline Construction Environmental Management Plan (OCEMP) (**Document Reference 4.2.3.0**). This is proposed to be secured through the **Proposed Conditions (Document Reference 1.5.0)**. This would be the case until a new Woburn Road connection to the new roads in

the West Gateway Zone is complete. The routing strategy in the OCTMP is defined to use the strategic road network and avoid local roads where possible.

Approach to Green Infrastructure

5.47 The Proposed Development is also supported by a comprehensive approach to delivering Green Infrastructure.

5.48 The Proposed Development will deliver the following key spatial moves:

- Improve Green Connections and Biodiversity
 - Inclusion of ecological connectors such as watercourses and woodland to join up habitats which would otherwise be fragmented
- Green links through the Site along existing and proposed roads and recreational routes
 - Provision of an EEA to create, restore and improve habitats, as set out in the **Environmental Controls Document (Document Reference 6.16.0)**
 - Green crossings to allow safe passage for wildlife
 - Provision of bat hop-overs
- Establish an Active Travel Network
 - Walking routes throughout the Site
 - Crossings across the Site to improve connectivity
 - Cycle routes along new highways and segregated cycle routes
 - Transport hubs to integrate public transport with access to the ERC
- Celebrate Unique Landscape Features
 - Primary gateways at key locations across the Site
 - Secondary gateways supporting wayfinding and navigation
 - Identification of key viewpoints along the Lake Path, with enhanced seating, landscaping and interpretative signage.
- Integrated Water Management Systems
 - Core Zone relocated watercourse including 10m riparian protection zone

- New wetland habitat in the Lake Zone as set out in the Outline Habitat Creation and Enhancement Plan
- Surface water network including swales, below ground pipe networks, green roofs, rain gardens and permeable paving
- Surface water reuse and recycling
- Surface water quality control

5.49 The planning proposal is accompanied by a Green Infrastructure Evaluation following Natural England's methodology which is provided in the Green Infrastructure Statement at Appendix 1 of the **DAS (Document Reference 6.2.0)**.

6.0 LEGISLATIVE AND POLICY FRAMEWORK

- 6.1 The following section provides an overview of the key national and local planning policies relevant to the Proposed Development. The relevant policies are provided at **Appendix 1**, together with an analysis of compliance of the Proposed Development against policy.
- 6.2 An assessment of the Proposed Development having regard to relevant national and local policy is then provided at Section 7.0.
- 6.3 There is no national policy which specifically deals with theme park development, however government policy on all levels provides support for major economic investment in the UK and recognises the importance of the tourism sector to the UK economy. Overarching government policy on tourism is briefly covered below, prior to listing relevant planning policy which has informed the assessment of key planning issues.

National Policy

National Planning Policy Framework (December 2024)

- 6.4 The National Planning Policy Framework (NPPF) sets out the Government's strategic-level planning policies. Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner.
- 6.5 The NPPF includes a presumption in favour of sustainable development. Whilst the Local Plan could not have envisaged a development of the type proposed by the Promoter, the presumption can be used as a basis of assessing the effects of the Proposed Development in policy terms. Paragraph 11d applies where there are no relevant development plan policies. This states that permission should be granted unless:
- i) *"The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
 - ii) *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination".*
- 6.6 In this regard, it should be noted that the policies referred to in i) are habitats sites (and those sites listed in paragraph 194 of the NPPF – European protected sites) and/or designated as Sites of

Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest); and areas at risk of flooding or coastal change. The Proposed Development does not engage with any of the designated sites referred to above. Its effects on designated heritage assets and areas at risk of flooding are considered in Section 7.0 of this Planning Statement.

6.7 Paragraph 85 of the NPPF within Building a Strong, Competitive Economy states:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”

6.8 The following sections of the NPPF are also considered relevant to the Proposed Development:

- Section 2 – Achieving Sustainable Development; the NPPF states that planning system has 3 overarching objectives, one of which is the ‘economic objective’. This requires the planning system to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity, and by identifying and coordinating the provision of infrastructure.
- Section 6 - Building a strong, competitive economy; requires policies to be developed which help create conditions in which business can invest, expand and adapt. The intention is to make sure planning policies stimulate conditions for growth both at local but also strategic levels, encouraging inward investment and capitalising on the enormous potential within the UK.
- Section 8 - Promoting healthy and safe communities; requires policy to aim to achieve healthy, inclusive and safe places and to provide social, recreational and cultural facilities.
- Section 7 – Ensuring the vitality of town centres
- Section 9 - Promoting sustainable transport; requires transport issues to be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places.

- Section 11 - Making effective use of land; requires planning policies and decisions to promote an effective use of land in meeting the need for homes and other uses, while safeguarding environment and ensuring safe and healthy living conditions. Section 11 places a strong emphasis on making as much use as possible of previously-developed land.
- Section 12 - Achieving well-designed and beautiful places; requires policy and decisions to consider the function, visual appearance, local character, sense of place, mix of development potential and safety, accessibility and inclusivity to make sure the creation of high quality, beautiful and sustainable buildings and places.
- Section 14 - Meeting the challenge of climate change, flooding and coastal change; requires planning policies to be developed to support the UK's trajectory towards net zero by 2050 and taking full account of the implications from a changing climate, flood risk and coastal change.

6.9 On matters of security and safety, Paragraph 102 of the NPPF requires that planning policies and decisions:

"should promote public safety and take into account wider security and defence requirements by:

- a) Anticipating and addressing possible malicious threats and other hazards (whether natural or man-made), especially in locations where large numbers of people are expected to congregate... the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies".*

National Planning Statements

6.10 National Policy Statements (NPS) are produced by government and set out the Government's policy in relation to particular types of nationally significant infrastructure project (NSIPs). They provide policies on how NSIPs should be assessed, and impacts mitigated.

6.11 There is no relevant NPS for the type of development proposed (as it is not an NSIP) and the road and rail improvements fall under the qualifying thresholds, however, policy in the NPS can still be a material consideration and so is briefly considered below.

6.12 The National Networks NPS (NNNPS), at para. 1.9, advises that

"Where schemes come forward under these alternative consenting routes, this NPS may be a material consideration in decision making. Whether, and to what extent, this NPS is a material consideration, will be judged on a case by case basis."

6.13 In general terms, the NNNPS recognises the role that national networks play in facilitating growth. Paragraph 3.8 states:

“Transport infrastructure is a catalyst and key driver of growth, and it is important that the planning and development of infrastructure fully considers the role it can play in delivering sustainable growth, how it can support local and regional development plans and the growth aspirations of local authority areas. This will include exploring options to unlock sites for housing and employment growth made accessible by sustainable transport and the regenerative impact major infrastructure can play in driving renewal, increasing density, as well as creating new places and communities.”

- 6.14 Paragraph 3.22 identifies that there is a compelling need for the development of the strategic road (and rail) network:

“The government has, therefore, concluded that at a strategic level there is a compelling need for development of the strategic road and strategic rail networks, and strategic rail freight interchanges (SRFIs) – both as individual networks and as a fully integrated system.”

- 6.15 Paragraph 3.33 recognises the role of the Strategic Road Network (SRN) in unlocking land for development:

“It may be at the regional or local level, where an SRN enhancement may unlock land for development, the creation of new employment centres, opportunities for large-scale logistics or for the creation of new communities underpinned by sustainable transport, with the additional social benefits that this brings.”

- 6.16 Paragraph 3.46 recognises the need for new junctions and slip roads:

“The government’s wider policy is to bring forward improvements and enhancements to the existing SRN where necessary to address the needs set out earlier. Enhancements to the existing national road network will include but are not limited to:

- new and improved junctions and slip roads;”*

- 6.17 Whilst the Proposed Development does not include the use of the railways themselves, it is facilitating access through the provision of a new railway station. Railway infrastructure is supported at a strategic level in the NNNPS as a catalyst of economic growth, as follows in paragraph 3.61:

“Transformational capacity improvements on the network have the potential to improve economic growth in an area. Improved and new rail links in less well-connected communities will enable better access to jobs, education, skills, housing, and leisure opportunities, and help reduce aspects of geographical inequality. It also catalyses growth in and around stations to increase housing delivery at density. Better connections into and between cities create opportunities to drive agglomeration so that businesses can collaborate and compete more effectively and expand labour markets.”

Tourism Recovery Plan (2021)

- 6.18 The Tourism Recovery Plan was published in 2021 to set out the Government's policy to enable the UK's world class tourism sector to recover as quickly as possible following the COVID-19 pandemic. Amongst other things, the Tourism Recovery Plan identifies in the Foreword that:

The tourism industry is one of the UK's great success stories. There were 41 million inbound visits in 2019 and domestic overnight trips in England looked set in 2020 to hit 100 million. Travel was the UK's third largest service export, a catalyst for trade, an engine for growth, a creator of jobs across the length and breadth of the country and a key component of Britain's enviable soft power ranking.

- 6.19 The Tourism Recovery Plan notes that tourism is an economic, social and cultural asset. The sector is a major contributor to jobs and growth in the UK, indirectly employing 4 million people and making a direct economic contribution of £75 billion a year pre-pandemic. The sector connects people to the UK's history, showcases the UK's innovation, and will have a key role to play in reviving the spirits of the nation as the country emerges from the pandemic.
- 6.20 The Recovery Plan states that the UK government wants to see a growing, dynamic, sustainable and world-leading tourism sector reaching its full potential and driving growth across all parts of the UK. Specifically, the aim is to:
- Recover domestic overnight trip volume and spend to 2019 levels by the end of 2022, and inbound visitor numbers and spend by the end of 2023 – both at least a year faster than independent forecasts predict.
 - Ensure that the sector's recovery benefits every nation and region, with visitors staying longer, growing accommodation occupancy rates in the off-season and high levels of investment in tourism products and transport infrastructure.
 - Build back better with a more innovative and resilient industry, maximising the potential for technology and data to enhance the visitor experience and employing more UK nationals in year-round quality jobs.
 - Ensure the tourism sector contributes to the enhancement and conservation of the country's cultural, natural and historic heritage, minimises damage to the environment and is inclusive and accessible to all.
 - Return the UK swiftly to its pre-pandemic position as a leading European destination for hosting business events.

- 6.21 The Plan states that the UK welcomed 41 million visitors in 2019, who spent over £28 billion, making the UK the tenth most visited country in the world and the fifth most valuable tourist destination.
- 6.22 The Recovery Plan also notes the importance of tourism to other sectors, noting that: *“If the tourism sector is successful, then many other sectors – like arts, culture, hospitality, air, maritime, rail, coach, and business travel – are successful too.”*

[Tourism Action Plan \(2016\)](#)

- 6.23 The Tourism Action Plan recognised the strength of tourism to the UK economy, noting that tourism is one of the UK’s most important industries with it directly responsible for 1.6 million jobs at all entry levels throughout the UK (in 2016). The Action Plan sets out principles for how to rebalance the sector, boosting jobs and growth across the county, rather than only in London.
- 6.24 Some of the initiatives in the Action Plan include:
- Development of new, pilot apprenticeships scheme;
 - Working to improve perceptions of the tourism industry;
 - Improving information on rail itineraries to improve understanding for international visitors;
 - Recognising the importance of rail connections for international travellers;
 - Modernising transport connections to the countryside;
 - Supporting the expansion of regional airports;
 - Supporting smart ticketing infrastructure.

Local Policy

[Bedford Borough Local Plan 2030](#)

- 6.25 The Bedford Borough Local Plan 2030 was adopted in January 2020 and seeks to plan for Bedford Borough’s growth needs to 2030.
- 6.26 The Bedford Borough Local Plan 2030 and the Policies Map 2020, include the following policies relevant to the Proposed Development. Details of these policies and how the Proposed Development responds to them are provided in **Appendix 1 of this Planning Statement**.
- Policy 3S - Spatial Strategy
 - Policy 7S – Development in the countryside
 - Policy 2S – Healthy Communities

- Policy 28S – Place Making
- Policy 29 – Design quality and principles
- Policy 30 – The impact of development – design impacts
- Policy 31 – The impact of development – access impacts
- Policy 32 – The impact of development – disturbance and pollution impacts
- Policy 33 – The impact of development – infrastructure impacts
- Policy 34 – Advertisements
- Policy 35S – Green Infrastructure
- Policy 36S – Forest of Marston Vale
- Policy 37 – Landscape Character
- Policy 38 – Landscaping in new development
- Policy 39 – Retention of trees
- Policy 40 – Hedgerows
- Policy 41S – Historic environment and heritage assets
- Policy 42S – Protecting biodiversity and geodiversity
- Policy 43 – Enhancing biodiversity
- Policy 46S – Use of previously developed land and use of undeveloped land
- Policy 47S – Pollution, disturbance and contaminated land
- Policy 49 – Waste
- Policy 50S – Water
- Policy 51S – Climate change strategic approach
- Policy 52 – Water demand
- Policy 53 – Development layout and accessibility
- Policy 54 – Energy efficiency
- Policy 55 – Renewable Energy
- Policy 57 – Renewable Energy General Impact
- Policy 69S – Amount and distribution of employment development
- Policy 74 – Employment Skills
- Policy 76 - Improvement and provision of new visitor accommodation
- Policy 78 – Out of centre development
- Policy 86S – Delivering infrastructure
- Policy 87 – Public transport

- Policy 88 - Impact of transport on people, places and environment
- Policy 89 - Electric vehicle infrastructure
- Policy 90S - Transport infrastructure and network improvements
- Policy 91 – Access to the countryside
- Policy 92 - Flood risk
- Policy 93 - Sustainable drainage systems (SuDS)
- Policy 97 – New sports and leisure facilities

[Allocations and Designations Local Plan July 2013 \(saved policies 15 January 2020\)](#)

- 6.27 The Allocations and Designations Local Plan 2013 was adopted 2013 by Bedford BC, with policies saved following the adoption of the Local Plan 2030.
- 6.28 The Allocations and Designations Local Plan identifies sites for development to meet the borough's needs to 2021 based on the scale and general locations agreed in the adopted Core Strategy and Rural Issues Plan. The plan refers to these as 'allocations'. The Plan also includes 'designations' for area of land or boundaries which indicate which specific policies apply.
- 6.29 Policies relevant to the Site and Proposed Development include AD24 Green Infrastructure Opportunities Zones, being a designation.
- 6.30 There are six Opportunities Zones across the borough, one of which spans part of and neighbours the Site – Zone 4 Bedford to Milton Keynes – Marston Vale. The Green Infrastructure Opportunities Zones designation identify areas in the borough where there is greatest potential to maintain and enhance the multi-functional nature of green infrastructure across the five themes of landscape, historic environment, biodiversity, accessible green space and access routes. Where appropriate, development will deliver or contribute to the protection, enhancement and/or creation of green infrastructure in accordance with the priorities set out for each opportunity zone.

[Minerals and Waste Local Plan 2014](#)

- 6.31 The Minerals and Waste Local Plan: Strategic Sites and Policies (MWLP: SSP) is jointly owned by Central Bedfordshire, Bedford BC and Luton Borough Council) and was adopted by Bedford BC in January 2014.
- 6.32 The MWLP:SSP outlines the strategic vision and objectives for future development and management of minerals and waste within the plan area and identifies strategic land allocations for minerals and waste development.

- 6.33 The MWLP:SSP identifies the Site as a safeguarding area of Oxford Clay. Policies MSP11 and MSP12 are therefore relevant.
- 6.34 The MWLP:SSP also identifies the Elstow Aggregate Railhead & Asphalt Plant to the east of the site and the strategic site at Elstow North which comprises a permitted waste site. The Proposed Development will not restrict the use of these sites or impact upon their safeguarding.
- 6.35 As set out in Table 6, above, the Site is subject to several extant consents (both TCPA and under the Environment Act 1995) for the extraction of Oxford Clay and site restoration. Although the operational life of some of these consents is still in place, there is no ongoing minerals extraction at the Site and it has been at least ten years since work on any restoration proposals took place. On this basis, even if restoration had not taken place in complete accordance with the approved plans, the time in which this could have been enforced, should this have been expedient, has lapsed for most of the consents in any event. In respect of the KHS Permission, an enforcement notice was issued nearly 20 years ago and UDX is not aware of any further action having been taken by Bedford BC.

[Draft Bedford Borough Local Plan 2040](#)

- 6.36 Bedford BC has been preparing the draft Local Plan 2040 which builds on the Local Plan 2030 strategy and extends the planning of the Borough on a further 10 years to 2040.
- 6.37 The draft Local Plan 2040 is now at the examination stage and has been placed on hold pending further work by Bedford BC to develop solutions to address an outstanding objection by National Highways. In placing the Local Plan examination on hold, Bedford BC also noted the potential for a Universal ERC, which needed to be considered before progressing further with the plan. Limited weight can therefore be placed on the emerging plan, although it is relevant in identifying Bedford BC's views on the appropriateness of the Site for development.

Biodiversity Net Gain

- 6.38 There is no statutory requirement to provide Biodiversity Net Gain (BNG) for a planning proposal made direct to MHCLG (save for applications under section 62A of the TCPA 1990). As such, a metric has not been prepared. The planning proposal does however provide a substantial new EEA which delivers enhanced habitats from what is currently on site.

7.0 ASSESSMENT AGAINST PLANNING POLICY

Background to the assessment

- 7.1 This section provides an assessment of the Proposed Development against national and local planning policy. Section 8.0 then considers other material considerations.
- 7.2 The Proposed Development provides an opportunity to deliver economic growth for Bedford, the wider region and the UK as a whole. The role of the UK planning system is to support such growth, and make sure it is delivered in a sustainable way, whilst minimising adverse impacts as far as practicable.
- 7.3 The Proposed Development could not have been envisaged when the current planning policy framework (both national and local) was devised. This assessment therefore considers compliance of the Proposed Development with policy, whilst recognising that it is not designed to deal with opportunities of the scale proposed. The planning balance therefore considers national and local policy, but is more focused on the overall outcomes, in terms of both potential benefits and adverse impacts. To this extent, the presumption in favour of sustainable development in the NPPF is considered. The Planning Statement therefore comes back to this, following analysis of the effects of the Proposed Development.
- 7.4 It is inevitable that a development of this scale will have some impact. It is the purpose of the **Design Standards (Document Reference 6.3.0)**, **Environmental Controls Document (Document Reference 6.16.0)** and other controls to make sure that these are limited to the extent feasible, whilst not unduly constraining the delivery of a world class ERC.
- 7.5 Policy both at national and local level seeks to protect the environment and amenity but recognises in some circumstances that the benefits of a proposed development may be sufficient to override impacts, even after mitigation has been applied. These considerations are addressed in Section 9.0 (Planning Balance).
- 7.6 This section should be read in conjunction with the Planning Policy Accordance Tables (**Appendix 1 of this Planning Statement**), although the detail contained within these tables is not repeated in the assessment sections to avoid repetition.

Principle of development

- 7.7 The Proposed Development presents a unique opportunity for the Bedford local area and the UK more broadly and will result in significant socio-economic benefits through increased job creation and tourism.

7.8 The planning proposal achieves a high level of consistency with the key themes within the NPPF. In particular, the Proposed Development will:

- meet the three sustainability objectives, economic, social and environmental (Paragraph 8);
- contribute to the local and national economy (paragraphs 85 and 89);
- contribute to the network of high quality open space and provide increased opportunities for sport and physical activity (paragraphs 96 and 103) through the provision of an active leisure use (the theme park(s), amusement park(s), active travel routes, and water park(s) and sports complex (*this benefit will be realised by the theme park and active travel improvements, whether or not all of the components of the ERC are delivered*);
- result in the productive use of brownfield land (paragraphs 89 and 124); and
- provide a well-designed place (paragraph 131 and 135).

7.9 The Proposed Development offers real opportunities to realise the future growth of Bedford and surrounding local authority areas, through the enhancement of the Wixams Rail Station and the safeguarding of part of the Site for a potential EWR Railway Station, and in turn the delivery of more homes and jobs, whilst providing wider transformational change through the delivery of local jobs, transport improvements, pedestrian and cycle links and vast amounts of opportunity from enhanced tourism and visitor spending.

7.10 The Proposed Development is consistent with the overall visions and objectives of the Bedford Local Plan 2030. In particular, the Proposed Development will:

- provide significant contribution to the local economy, deliver economic growth and broaden employment opportunities (paragraph 4.3);
- facilitate improvements to Bedford BC's transport infrastructure through the delivery of the new expanded Wixams Rail Station and encourage walking, cycling and other sustainable and healthy modes of transport (paragraph 4.7);
- support the creation of a strong and multifunctional green infrastructure network and delivery on the spirit of the objectives of the Forest of Marston Vale (paragraph 4.8); and
- provide a high quality development that makes use of previously developed land (paragraph 4.9).

Housing and employment growth

7.11 It is anticipated that an investment of this scale will have effects on housing and employment growth in Bedford and the wider area. This is however best dealt with through the Local Plan process to ensure that this growth can be properly planned. Bedford BC has placed on hold the examination of its emerging Local Plan and, should an investment decision be made to progress with the Proposed Development, it has indicated that it will then take the Project into account in planning for future housing and employment opportunities.

Economy, investment and jobs

7.12 As noted above, the NPPF and Bedford Local Plan 2030 have a clear requirement to deliver economic growth and broaden employment opportunities for the local area.

7.13 In this regard, the Proposed Development will result in significant socio-economic benefits for the Bedford area and nationally.

7.14 The key benefit of the proposal will be an increased number and breadth of employment opportunities which will be created, including:

- 5,380 construction jobs at the peak of construction;
- 8,050 direct jobs created in the first year of operation and increasing to 12,465 by the 20th year of operation; and
- creation of 25,195 net additional jobs across the UK through the supply chain in the first year of operation, growing to 42,485 jobs across the UK by the 20th year of operation.

7.15 The planning proposal is supported by an **Employment and Skills Plan (Document Reference 6.12.0)**, which demonstrates how the Proposed Development will work with local institutions and businesses to support a healthy and growing economy. This document secures specific commitments which will enable the benefits of the Proposed Development to be realised by local and young people, including disadvantaged groups and the economically inactive. Some of the specific measures included within it are summarised earlier in this document at Section 5.0.

7.16 The **Employment and Skills Plan** centres on building on the success of employment and skills-related programs that have been delivered at UDX's other destinations, but with a specific focus on the issues identified locally. Research undertaken to date has identified that a very low proportion of workers in Central Bedfordshire receive in work training, this is something UDX would help redress through measures implemented as part of the **Employment and Skills Plan**. In addition, UDX would provide alternate routes into employment, such as internships which would cater to

the large number of Bedford (and surrounding area) residents who are economically active and seeking employment.

7.17 **Appendix 6 of this Planning Statement (Socio-economic benefits)** anticipates that the Proposed Development could provide an overall contribution of £35 billion 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 UK as a whole.

7.18 In addition, it is projected that over the 27-year appraisal period, the Proposed Development would generate £14.01 billion (NPV) in net additional tax returns to HM Treasury (via employee income tax, VAT receipts and business rates revenue). A further £104 million (NPV) would accrue to Bedford BC (i.e. via business rates retention), in the process supporting the delivery of local services.

7.19 On this basis, the Proposed Development is highly compliant with the economic development policies at both a national and local level.

Transport, access and infrastructure

7.20 The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios. Similarly, the Bedford Local Plan 2030 seeks to ensure that development proposals do not have any significant adverse effect on the public highway and that opportunities for access by public transport, cyclists and pedestrians is considered.

7.21 **Chapter 5 of the ES: Traffic and Transport (Document Reference 2.5.0)** provides an assessment of the Proposed Development on Traffic and Transport and is supported by a comprehensive Transport Assessment.

7.22 The Proposed Development aims to create a world-class visitor attraction that is at the forefront of sustainability and will be industry-leading in terms of encouraging visitors and staff to travel to the Site by non-car modes. In order to achieve this, the Transport Assessment has taken a Vision-led Planning approach to transport planning, consistent with the NPPF, which promotes using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This has entailed:

- Early engagement with local communities on the traffic and transport element of the Proposed Development;
- Realistic and adequate testing of scenarios; and
- Prioritising sustainable transport modes.

7.23 In order to achieve the vision, it will be necessary to make sure the majority of people travelling to and from the ERC do so using non-car modes. The vision is that for UK travel, it is reasonable to design for a 40:40:20 split of visitor movement between road, rail and 'other' modes, where 'other' modes include dedicated coach travel, local bus and taxi travel.

7.24 The Transport Assessment confirms the two major pieces of transport infrastructure, a grade separated junction to the A421 and a larger railway station on the Midland Main Line at Wixams, can deliver the forecast transport demands to and from the Proposed Development. In addition, the land for a potential new railway station on EWR is safeguarded, although the delivery of this station is not relied upon to deliver the proposed modal split. This is supported by the DfT, who has analysed the demands and is satisfied that the rail networks, including other stations on the lines, are capable of accommodating the demands (see DfT SOAP at **Appendix 4**).

7.25 The expanded Full Wixams Rail Station is to be delivered by Network Rail. Any station and tracks related to EWR Co. would be the responsibility of DfT and EWR Co., although this is not part of the Proposed Development.

7.26 In addition, several embedded transport mitigation measures are also proposed to be implemented during both the construction and operational phases of the Proposed Development. These include:

Construction Embedded Mitigation

- An Outline Construction Traffic Management Plan (OCTMP), provided at Section 3.3 of the OCEMP, forms part of the Proposed Development's management measures, secured by proposed condition 5 in the **Proposed Conditions (Document Reference 1.5.0)**. The OCTMP sets out the phasing and strategy, the management measures, the monitoring approach and the compliance structure.
- The OCTMP also includes the proposed routing strategy using the Strategic Road Network (SRN) and avoiding local roads where possible.
- Creation of a direct construction access from Broadmead Road via Woburn Road; and

- The junction of Broadmead Road and Woburn Road/Bedford Road will be signalised when required as referenced in the **Dependencies Table (Document Reference 6.18.0)**.

Operational Embedded Mitigation

- The junction of Broadmead Road and Woburn Road/Bedford Road will be signalised as part of the Proposed Development works associated with creating the new A421 Junction. The form and location of the works, while similar in nature to those during the Construction Phase, are slightly different as the tie-in between Woburn Road/Bedford Road and Broadmead Road changes as a result of the new A421 Junction.
- Two new Public roads (A and B) connecting the Site with the wider area and providing strategic links within the Site.
- Within the Site, pedestrian and cycle routes are provided along key desire lines, which seek to connect into routes in the wider area, to be delivered by Bedford BC.
- From the Lake Zone, a pedestrian and cycle link is proposed to the Interchange Retail Park to tie into existing facilities.
- An expanded Wixams Rail Station with its new west-facing plaza will provide last-mile connection to the ERC.
- Shuttle buses between Milton Keynes Rail Station and the Site for the period in which there is no EWR station on the Marston Vale Railway Line within proximity of the Site.
- Implementation of an agreed M&MP, as provided within the Travel Plan **Appendix 5.6 of the ES (Document Reference 4.5.6.0)**.

7.27 The scale of the improvements to rail and road (both local and arterial in nature) is extensive. The NPPF supports the promotion of development that facilitates access to high quality public transport.

7.28 The Transport Assessment demonstrates that the proposed connections are deliverable and will achieve what they set out to do. The Transport Assessment concludes that there is no transport reason the Proposed Development should not be supported.

7.29 Notwithstanding the scale of transport improvements proposed, the Proposed Development will result in additional trips on the highway network and so UDX is proposing that this is further controlled by the M&MP which provides strong sanctions to incentivise UDX to take action if more

vehicles are visiting the Site than the highway network can safely accommodate. The provisions in the M&MP include:

- a requirement for UDX to monitor vehicle movements on specified days and at specified locations and times;
- a requirement to prepare monitoring reports;
- a requirement to notify the Secretary of State, National Highway and Bedford BC in the event of any exceedances of the limits in the M&MP and send them a copy of the relevant Monitoring Report and Management Plan (defining Management Actions and a programme for implementation);
- begin implementing certain management actions in accordance with a programme set out in the Management Plan (subject to agreement with Bedford BC and/or National Highways to the extent required);
- unless specified otherwise in the M&MP, if an exceedance occurs within three consecutive monitoring periods, UDX shall be subject to a restriction of special events and, if despite this, continued exceedances occur, a framework Improvement Scheme shall be prepared.

7.30 The terms used above are defined in the M&MP and do not need to be set out here.

7.31 The M&MP within the proposed Travel Plan, together with the significant public transport improvements, are considered to be an effective way to manage the traffic impacts of the Proposed Development.

7.32 Paragraph 116 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios. The Transport Assessment concludes that this would not be the case and therefore the Proposed Development is compliant with the NPPF in this regard.

7.33 The significant improvements to local transport infrastructure that the Proposed Development would deliver are also entirely consistent with Bedford BC's objective 4.7 in the Local Plan 2030 to *"improve the borough's transport infrastructure in order to support more growth in the local economy and make the borough more attractive as a place to live and do business"*.

7.34 Policy 89 of the Bedford Local Plan 2030 seeks to maximise the use of sustainable transport in developments, and support low carbon public and personal transport such as electric cars, bikes

and buses. The Proposed Development includes facilities for servicing, maintaining, valeting, and fuelling vehicles, including electric and other charging facilities. The **Design Standards (Document Reference 6.3.0)** include standards in relation to the provision of electric vehicle parking. The Proposed Development also includes vehicle pick up and drop off for buses, coaches, taxis and ride shares.

New town centre uses

7.35 Paragraph 90 of the NPPF explains that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management, and adaptation. Further paragraph 90 requires an impact assessment for retail and leisure proposals outside of town centres, which are not in accordance with an up-to-date plan including consideration of a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

7.36 Further, paragraph 91 sets out government policy on the sequential test for main town centre uses:

“91. Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.”

7.37 Paragraph 95 explains that where an application fails to satisfy the sequential test, it should be refused. This is reflected in paragraphs 11.50 to 11.52 and Policy 78 of the Bedford Local Plan 2030.

7.38 Compliance with NPPF policy on main town centres uses is considered in **Appendix 2 of this Planning Statement**. This concludes that there are no sequentially preferable sites that would accommodate the ERC, which can only be delivered as a whole, given its unique characteristics.

7.39 In terms of impact on town centres, it is helpful to consider overall outcomes of the Proposed Development on town centres in the context of what the NPPF is trying to achieve. The sequential test for main town centre uses is there to assist in the creation of vital and viable town centres and make sure that where suitable, available and viable town centre sites exist, that these are preferred over edge of centre, and then out of centre, locations.

- 7.40 In this case, the Proposed Development is resulting in a significant increase in spending, both as a result of new visitors to the area, but also through increased employment opportunities for local people, who would then spend their money locally. This would likely have knock on beneficial effects for the long-term viability of the existing retail and leisure landscape across the town centres in the area.
- 7.41 **Chapter 13 of the ES: Socio-Economics (Document Reference 2.13.0)**, also considers the level of potential trade draw from existing town centres in the study area. Even under a cautious worst case scenario (where the phrase “cautious worst case” is used to mean “a cautious worst case that provides a robust assessment of likely significant effects”), whereby it is assumed that all spend from residents within a one hour commute of the ERC would have gone to town centres in Bedford and Central Bedfordshire, the reduction in spending to the town centres would be 1.8%. This assumption is unrealistic and very conservative, given that the one-hour catchment for primary residents extends beyond these local authorities. Furthermore, total expected spend in Bedford and Central Bedfordshire (from all types of visitors) is expected to reach almost £175m in the opening year, over twice as much as the spending by primary residents on-site. This shows that even in the worst case scenario, businesses in Bedford and Central Bedfordshire town centres can expect to benefit from the trade creation associated with the proposed ERC, even if there may exist some trade diversion for primary residents, as this will be more than offset by expenditure in the area from new visitors.
- 7.42 On this basis, the Proposed Development complies with national and local policy on town centre impact and the sequential test.

Good design

- 7.43 Paragraph 131 of the NPPF states that good design is a key aspect of sustainable development and creates better places to live and work.
- 7.44 **Design Standards (Document Reference 6.3.0)** have been prepared to make sure that the Proposed Development achieves good design, respects its neighbours and the environment and delivers local and regional benefits whilst creating a positive legacy for the future.
- 7.45 The nature of the core components of the Proposed Development, including the theme park(s), amusement park(s) and/or water park(s) and related retail, dining, entertainment and visitor accommodation means that it will evolve over time with new creative ideas and as technology improves, to make sure that the resort is consistently among the world’s most innovative, thrilling, and immersive entertainment experiences.

- 7.46 The Design Standards have therefore been written to provide controls, where required, without unduly limiting the ability of the Proposed Development to deliver the best guest experience throughout the lifetime of any planning permission granted, and in turn to maximise its positive socio-economic benefits whilst leaving behind a positive legacy.
- 7.47 UDX has vast levels of experience of delivering attractive, well-designed theme parks and resorts and this is one of its selling points in the industry. It is noted that many of the positive comments received during the public engagement process focused on the high quality of UDX's existing destinations.
- 7.48 Section 10 of the **DAS (Document Reference 6.3.0)** sets out the proposed approach to post-decision approval, which secures 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.
- 7.49 It is therefore considered that the Proposed Development will satisfy the policy requirement of delivering good design and will result in an overall attractive destination to visit and in which to work.

Landscape and visual impact

- 7.50 The NPPF requires development to be sympathetic to local character and history, including the built environment and landscape setting, while not preventing or discouraging appropriate innovation or change. Policy 37 of the Bedford Local Plan 2030 states that development proposals will protect and enhance the key landscape features and visual sensitivities of the landscape character areas identified in the Bedford Borough Landscape Character Assessment May 2014. Policy 28S requires that development proposals will enhance the landscape, include appropriate landscaping and contribute to the provision of green infrastructure.
- 7.51 **Chapter 7 of the ES: Landscape and Visual (Document Reference 2.7.0)** provides an assessment of the landscape and visual impact (LVIA) of the Proposed Development.
- 7.52 The LVIA, following engagement with Bedford BC has compiled a list of 38no. viewpoints for assessment of visual receptors. The most notable visually sensitive receptors represented by these viewpoints are:
- residents at Wootton, Wixams, Stewartby, Marston Moretaine and Kempston Hardwick;

- recreational users of the John Bunyan Way/Greensand Ridge Walk, and Marston Vale Trail; and
- visitors to Ampthill Park, Ampthill Park House and Houghton House.

7.53 In addition, the LVIA identifies the following landscape receptors which are potentially sensitive to change from the Proposed Development during the construction and/or operational phase:

- LCA 5D North Marston Clay Vale is the host LCA.
- 1A Cranfield to Stagsden Clay Farmland;
- 3B Oakley – Great Ouse Limestone Valleys;
- 5E: East Marston Clay Vale;
- 6B Mid Greensand Ridge;
- Bedford Urban Area (which includes Kempston); and
- existing landscape features that contribute to the landscape fabric within the Site.

7.54 The Proposed Development includes embedded mitigation measures to seek to reduce significant landscape and visual effects, including the following during the Operational Phase:

- Tree planting will be included adjacent to the transport hubs within the East Gateway Zone and Core Zone by Network Rail to break up the visual mass of these developments and provide gateway features. Design Standards CZ6.1 and EG6.1 specify that tree planting will be provided adjacent to the transport hubs (**Document Reference 6.3.0**).
- The perimeter of the Site will be planted (either through retention of existing vegetation or provision of new mitigation planting), as indicated in the **Figure 7-9 of the ES: Landscape Mitigation Plan (Document Reference 3.7.9.0)** and secured by the Habitat Creation and Enhancement Controls and the Arboricultural Controls in the **Environmental Controls Document (Document Reference 6.16.0)**. This will provide screening of lower elements of the Proposed Development.
- Mitigation planting or alternative visual screening will be provided adjacent to Manor Road (to the south of the new road alignment), and existing planting along the northern side of Manor Road will be retained where feasible to provide screening to Manor Road cottages as indicated in **Figure 7-9 of the ES: Landscape Mitigation Plan** and secured by the Habitat

Creation and Enhancement Controls and the Arboricultural Controls in the **Environmental Controls Document (Document Reference 6.16.0)**.

- Where feasible, and to allow required access points, existing planting along sections of Broadmead Road (southern boundary to the West Gateway Zone and Core Zone) will be retained as screening as indicated in **Figure 7-9 of the ES: Landscape Mitigation Plan** and secured by the Arboricultural Controls in the **Environmental Controls Document (Document Reference 6.16.0)**.
- Existing vegetation will be retained along the eastern margins of the Marston Vale Railway Line within the Core Zone and Lake Zone as indicated on **Figure 7-9 of the ES: Landscape Mitigation Plan** (where the land is within the control of UDX) and secured by the Arboricultural Controls in the **Environmental Controls Document (Document Reference 6.16.0)**.

7.55 The combination of varying building forms would be laid out to break up any continuous mass, and provide focal points, and no buildings above 10m would be constructed within 20m from the property line.

7.56 Main public access roads within the Proposed Development will include appropriate native tree and shrub planting, as specified by Design Standard SW6.1 (**Document Reference 6.3.0**).

7.57 The LVIA takes a cautious worst case approach that provides a robust assessment of the likely significant effects. Details of the specific location and extent of buildings, structures and vegetation are limited at this stage of design. The principle of an articulated or varied outline has been confirmed and this has been applied as broad principles and to the full extent of the relevant Zones to enable a robust assessment to be undertaken.

7.58 It should also be noted that whilst the articulated skyline would ease the appearance of the larger elements in any particular view, in most cases it does not result in a reduction of impact below major/moderate adverse, from an LVIA perspective. This is because the Proposed Development is introducing significant (and in some cases very tall) development onto a currently vacant Site located on a relatively flat plain that is highly visible from the wider landscape.

7.59 The LVIA concludes that significant moderate-large adverse effects would be identified during both construction and operation in terms of both landscape and visual effects. The effects arise primarily as a result of the construction and operation of the tallest elements of the Proposed Development

(ERC up to 75m with an Attraction Overlay Zone⁴ up to 115m). Even with substantial new perimeter planting, these features would be visible above intervening vegetation within a predominately flat landscape or where elevated views have a broader angle of views from local ridgelines to the south and west.

- 7.60 Specific additional mitigation measures have not been identified at this stage, beyond the use of hoardings to the Site boundary during construction, proposed perimeter planting and the embedded mitigation referred to in paragraph 7.54 above, on the basis that it is not yet known where the tallest structures would be located. However, the **Design Standards (Document Reference 6.3.0)** [Design Standard OSC01] include the principle of an articulated skyline that varies the height of buildings, which will contribute to reducing effects, particularly within broader or distant views where several buildings or the whole development would be visible.
- 7.61 Good design is embedded within the **Design Standards** and the post-decision approval process (set out in the **DAS (Document Reference 6.2.0)** will make sure a high quality built environment is delivered, which reflects the intentions of paragraph 135 of the NPPF which seeks to make sure that developments, amongst other requirements: function well and add quality to the area over the life of the development; are attractive as a result of good architecture, layout and landscaping; establish a strong sense of place; optimise the potential of the site, and create safe, inclusive and accessible spaces.
- 7.62 The Bedford Borough Local Plan 2030 identifies the Site as within the Forest of Marston Vale, one of twelve community forests established throughout England by the Countryside Commission and Forestry Authority. Policy 36S of the Bedford Local Plan requires proposals within the Forest of Marston Vale area to demonstrate how they will deliver 30% tree cover. As part of the engagement on the Proposed Development, UDX has agreed a SOAP with the Forest of Marston Vale about how the proposal might contribute to their policy goals, including environmental-led regeneration of the Forest of Marston Vale and increasing tree coverage across the Site (see **Appendix 4**).

⁴ 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.

7.63 It is anticipated that the Proposed Development would increase the number of trees on the Site and may be able to deliver the 30% tree cover within this policy, however, as the detailed landscape design has yet to be developed, UDX is unable to commit to that target. The SOAP with the Forest of Marston Vale Trust confirms its position that it recognises that UDX's Proposed Development, which includes a commitment to deliver a wetland habitat based EEA, together with significant woodland planting on the perimeter and tree planting within the ERC as a landscape feature, has the potential to deliver on the core environmental vision, aims and objectives for creating the Forest of Marston Vale.

7.64 Policy AD24 of the Allocations and Designations Local Plan July 2013 (saved policies 15 January 2020) identifies the Site as a Green Infrastructure Opportunity Zone (Zone 4 Bedford to Milton Keynes – Marston Vale). The Proposed Development includes significant landscaping and ecological measures which will help to achieve the objectives of Policy AD24. These measures include:

- creation and enhancement of woodland and tree habitats, including 14ha of woodland habitats;
- creation and enhancement of hedgerows to provide landscape integration and habitat linkages; and
- measures to enhance the riparian zone of the Elstow Brook, including grassland and scrub planting within the 10m buffer zone (where drainage management access allows), particularly in the Lake Zone where this is currently arable habitat.

7.65 The Proposed Development would not have an impact on any designated landscapes in terms of national policy in the NPPF.

7.66 The Proposed Development is considered to be consistent with the overall intent of Policy 28S (Place making) of the Bedford Local Plan 2030 in that it is a high-quality design which:

- has a positive relationship with the surrounding area in terms of embedding sustainable transport and active travel links, and delivering an ecological enhancement area in the Lake Zone;
- contributes to the provision of green infrastructure;
- enhances the landscape through the redevelopment of a brownfield site;
- includes appropriate landscaping; and

- contributes to the creation of the Forest of Marston Vale through significant additional tree planting.

7.67 Given the very visible location of the Site, and the nature of the use proposed, it is not possible to entirely avoid landscape effects of the Proposed Development. However, as outlined above, embedded mitigation measures and the **Design Standards (Document Reference 6.3.0)** have been put in place to ensure that the adverse landscape effects are minimised as far as practicable. On this basis, the Proposed Development is not considered to completely comply with Policy 37 of the Bedford Local Plan, which seeks that development protects and enhances key landscape features and visual sensitivities of the landscape character areas. It is however considered that the Proposed Development complies with the NPPF, which seeks development to be sympathetic to landscape setting, while not preventing or discouraging appropriate innovation or change.

Development in the countryside

- 7.68 Policy 7S of the Bedford Local Plan 2030 relates to development in the countryside. It is primarily drafted to allow appropriate small-scale development, including re-use of rural buildings, affordable housing and accommodation for rural workers, and to direct major development towards non-countryside locations.
- 7.69 Policy 7S is a positively worded policy which seeks to support development in certain locations. The Site is located just outside of the current Settlement Boundary and the Proposed Development does not accord with points i to vi and viii to x of the policy. It is noted that there is both community and Bedford BC support for the Proposed Development (point vii).
- 7.70 With respect to xi) the Proposed Development is introducing significant woodland planting and a new wetland ecosystem in the Lake Zone, which is currently formed of the former brickworks and clay pits, which helps contribute to the intrinsic beauty of the countryside.
- 7.71 With respect to xii), it is not considered overall that the Proposed Development would adversely affect the use and enjoyment of the countryside by others, nevertheless, it will result in some residual adverse effects and is proposing a major development in a partly countryside location.
- 7.72 With respect to xiii) the Proposed Development includes a comprehensive approach to ecological mitigation which has been successful at reducing effects to not significant for the majority of habitats and species. There are beneficial impacts to certain species as a result of the new wetland habitat creation. The Proposed Development would not result in any adverse effects on a SSSI (national) or Natura 2000 (international) site. However, given the scale of the Proposed

Development and the nature of the existing Site, some adverse effects remain across some of the receptor groups within the Site.

- 7.73 The Proposed Development does not comply with this policy on the basis that it is introducing a major new use in a location partly in the countryside and results in some significant adverse effects on the environment and biodiversity, however it is not considered that this policy was prepared to envisage development of the scale proposed.

Noise and vibration

- 7.74 Paragraph 198 of the NPPF requires planning policies and decisions to make sure that new development is appropriate for its location. Paragraph 198a, requires consideration to be given to opportunities to mitigate and reduce potential adverse impacts resulting from noise, and avoid noise giving rise to significant adverse impacts on health and quality of life.
- 7.75 Policy 32 of the Bedford Local Plan 2030 requires that development proposals ensure that they minimise and take account of the effects of pollution and disturbance and that planning applications give particular attention to, inter alia, noise, vibration, harmful emissions, existing tranquillity of the area, the suitability of the existing environment in relation to nuisance or pollution in the vicinity of the site and factors which may give rise to disturbance to neighbours and the surrounding community including overlooking, crime and community safety concerns.
- 7.76 **Chapter 9 of the ES (Document Reference 2.9.0)** provides an assessment of the likely significant noise and vibration effects of the Proposed Development.

Construction

- 7.77 The Noise and Vibration Assessment identifies potential significant noise and vibration impacts for some residential receptors and on the Kempston Hardwick moated site during construction. To mitigate these effects the Principal Contractor will employ Best Practicable Means (BPM) to limit construction noise and vibration at nearby sensitive receptors. Due to unknowns regarding the structural integrity of the Kempston Hardwick moated site, it is proposed that a Piling Risk Assessment be undertaken to consider potential vibration impacts at the monument. Further details of this are set out in **Appendix 9.2 of the ES: Construction Noise Vibration Assessment (Document Reference 4.9.2.0)** and **Appendix 2.3 of the ES: Outline Construction Environmental Management Plan (OCEMP) (Document Reference 4.2.3.0)**. Nevertheless, moderate, or moderate to major, adverse effects are anticipated to remain for some receptors after mitigation during construction.

Operation

- 7.78 UDX is committing to achieving a Core Zone noise limit for which consent is being sought. The proposed noise limits are set out in the **Environmental Controls Document (Document Reference 6.16.0)**, being: 60 dB LAeq,1hr during the day, 55 dB LAeq,15min during the night applicable to all Receptor Control Locations (RCLs) with the exception of RCL04 and RCL05, and 50 dB LAeq,15min during the night applicable to RCL04 and RCL05. This represents a cautious worst case and would include contributions from all Core Zone activities, including Halloween Horror Nights, Holidays and Special Events.
- 7.79 Mitigation measures have been proposed that could be utilised where required to achieve the Core Zone noise limits at RCLs (set out in the **Environmental Controls Document, Document Reference 6.16.0**). Several of these measures have been identified as embedded mitigation.
- 7.80 When achieving these noise limits, a relatively small number of properties centred on RCL01 (properties on Manor Road), four of which are currently owned by UDX, are predicted to experience a residual moderate adverse effect which is significant.
- 7.81 At the dwellings on Manor Road near RCL02, a residual major adverse effect which is significant is identified.
- 7.82 At the travellers' site on Ampthill Road near RCL03, a residual moderate adverse effect is identified which is significant.
- 7.83 At the residential community south of Wixams near RCL04, a residual moderate adverse effect is identified which is significant.
- 7.84 In the case of properties north of Stewartby centred on RCL05 and RCL06, only a relatively small number, i.e. a single property at Broadmead Farm and properties on the northern edge of Stewartby with northern aspects and line of sight to the Proposed Development, are predicted to experience a residual major adverse effect which is significant. A selection of properties located farther south are predicted to experience a moderate adverse effect which is significant with the majority experiencing either a minor adverse or negligible effect which is not significant.
- 7.85 The broadband noise limits are similar to those established for other UDX parks, namely:
- Universal Epic Universe: 60 dBA daytime; 55 dBA night-time
 - Universal Studios Japan: daytime ranges from 60 dBA to 65 dBA; 55 dBA night-time

- 7.86 Some UDX parks are exempt from noise standards. In these cases, UDX self-regulates noise to mitigate impacts to adjacent residential communities. In its experience, noise levels consistent with those proposed for the Core Zone are sufficient to achieve such mitigation.
- 7.87 Paragraph 9.6.6 of Chapter 9 of the ES explains that assessments have been undertaken of daytime and night-time noise impacts at the nearest noise sensitive receptors (or RCLs) resulting from the operation of the Core Zone at its anticipated maximum allowable noise level, i.e. at the Core Zone noise limits for which consent is being sought, which for this assessment is defined as occurring during the Halloween Horror Night, Holidays and Special Events. These have informed Core Zone noise limits as set out in 7.79 above. Whilst the noise limits for which consent is being sought are the same for all sensitive receptors (with the exception of the larger communities at Wixams and Stewartby, which are subject to stricter night-time noise limits), it is highly unlikely that these limits will be reached beyond the closest sensitive receptors and therefore Chapter 9 also presents a more likely and realistic assessment for these more distant sensitive receptors, which are referred to as 'typical' noise levels, which are set out in Table 9-21 of the ES.
- 7.88 With the proposed commitments to noise limits, it is considered that an appropriate balance is achieved between mitigating impacts to acceptable levels and allowing the ERC to operate in a way which is consistent with UDX's resorts around the globe. In this regard it is considered that the Proposed Development accords with national and local policy on mitigating and reducing potential adverse impacts resulting from noise and avoiding noise giving rise to significant adverse impacts on health and quality of life.

Air Quality

- 7.89 The NPPF requires local authorities to take account of national and local requirements for air quality in developing local plans and determining planning applications. Policy 32 of the Bedford Local Plan 2030 requires development proposals to ensure that they minimise and take account of effects of pollution and disturbance, giving particular attention to a number of considerations, including noise, vibration, smell and harmful emissions. **Chapter 8 of the ES (Document Reference 2.8.0)** provides an assessment of the likely significant effects of the Proposed Development on Air Quality.
- 7.90 The Air Quality Assessment prepared as part of the EIA, confirms that there are no significant air quality effects anticipated. The Air Quality Assessment identifies the residential properties in Kempston Hardwick and Stewartby, commercial premises in Kempston Hardwick and ecological receptors at Kempston Hardwick Pit CWS and Coronation Pit CWS as potentially susceptible to adverse effects as a result of construction dust during the Construction Phase. The Air Quality

Assessment confirms that through the additional mitigation measures proposed the residual effects for both human and ecological receptors will likely be not significant.

- 7.91 Mitigation measures to minimise the risk of dust impacts are outlined within the **OCEMP (Document Reference 4.2.3.0)** and details to be submitted pursuant to condition 5 in the **Proposed Conditions (Document Reference 1.5.0)** will make sure air quality is appropriately managed throughout the Construction Phase.
- 7.92 The Air Quality Assessment identifies residential, school, and medical premises in Bedford, Elstow, Kempston, Wooton, Kempston Hardwick, Stewartby, Marston Mortaine and Wixams as potentially susceptible to adverse effects from road traffic emissions during the Construction Phase. The Air Quality Assessment confirms that through the additional mitigation measures proposed the residual effects during construction will likely be not significant.
- 7.93 For the Operational Phase, the Air Quality Assessment identifies potential adverse effects resulting from road traffic emissions for human and ecological receptors. The Air Quality Assessment confirms that through the additional mitigation measures proposed the residual effects on human receptors will likely be not significant. In relation to ecological receptors, residual effects are addressed in **Chapter 6 of the ES (Document Reference 2.6.0)** and in the below section.
- 7.94 The Proposed Development therefore accords with the NPPF and Policy 32 of the Bedford Local Plan 2030 with regard to air quality and emissions.

Ecology and Biodiversity

- 7.95 Paragraph 193 of the NPPF seeks to avoid significant harm to biodiversity resulting from a development, or if not, that harm is adequately mitigated or, as a last resort, compensated for. Furthermore, loss of veteran trees should be for wholly exceptional reasons and a suitable compensation strategy should be provided.
- 7.96 Policy 28S of the Bedford Local Plan 2030 states that development should avoid adverse impacts on biodiversity and geodiversity assets.
- 7.97 **Chapter 6 of the ES: Ecology and nature conservation (Document Reference 2.6.0)** provides an assessment of the likely significant effects of the Proposed Development on Ecology and Nature Conservation.
- 7.98 The Ecology and Nature Conservation Assessment confirms that there are no Statutory Designated Sites of International importance (SACs, Special Protection Areas – SPAs; and Ramsar sites) located within 10km of the Site. The nearest Statutory Designated Sites of National importance (SSSI) is

located 2.3km southeast of the Site (Kings Wood and Glebe Meadows, Houghton Conquest SSSI). The Site is host to 2 non-statutory designated sites; Kempston Hardwick Pit CWS and Coronation Pit CWS. The Elstow Pit CWS, Quest Pit CWS and Stewartby Lake CWS are under 1km from the Site have functional hydrological linkages and potential air quality effects. In terms of other habitats of principal importance (HPI), the ES identifies that the Proposed Development would cross approximately 6.4ha of potential deciduous woodland and a single Water Framework Directive (WFD) designated body lies within the Site boundary. A single veteran tree was identified within the Site, which is to be retained as part of the Proposed Development with suitable offsets secured, as well as several protected species, a full list of important ecological features for the purposes of the assessment is provided within Chapter 6 of the ES.

7.99 The Proposed Development includes embedded mitigation to avoid, mitigate and compensate for ecology and nature conservation effects. A large part of the northern portion of the Kempston Hardwick Pit CWS (that within the Lake Zone) will transition from an early-successional wetland ecosystem to a deep-water lake ecosystem with fringing fen and marginal wetland habitats. The following habitats will be created in this new lake environment:

- shallow, littoral banks supporting 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, an open mosaic of grassland, scrub and ruderal vegetation will be created.

7.100 Provision and establishment of compensation habitats equating to at least an equivalent area and type of CWS habitats removed or substantially affected to facilitate the Proposed Development will be provided and secured in the **Environmental Controls Document (Document Reference 6.16.0)**.

7.101 Scrub and young trees located to the south of Kempston Hardwick Pits main lake and to the north of Manor Road will be retained to maintain a buffer of vegetation to the water's edge. The habitat type and species composition will be fully determined at detailed design stage but will be reflective of surrounding habitat and contribute to the provision of similar habitat within the local area. This will provide habitat for a range of fauna.

7.102 In addition, woodland and tree habitats will be created across the Site as shown in Figure 1 of the **Outline Habitat Creation and Enhancement Plan (OHCEP) (Appendix 6.4 of Chapter 6 of the ES,**

Document Reference 4.6.4.0). Proposals for woodland planting will be fully determined at the detailed design stage within the Ecological Enhancement Areas (EEA) and will include replacement tree and woodland planting. Areas of new woodland will link to existing areas of woodland where practicable, within the wider landscape to retain habitat corridors. Woodland areas will be predominantly native broadleaved woodland, with a smaller component of mixed woodland to increase climate change resilience. The management of areas of woodland will be aimed at enhancing biodiversity (and where conducive landscape and amenity) value rather than any commercial purpose and be designed to support structural and species diversity, as provided for by the **Outline Landscape and Ecology Management Plan (OLEMP) (Appendix 6.5 of Chapter 6 of the ES, Document Reference 4.6.5.0).**

- 7.103 The ES identifies a moderate beneficial residual effect during construction on the Kempston Hardwick Pit CWS as a result of the establishment of the new deepwater lake ecosystem, which is balanced with a significant major adverse effect as a result of the transition from an early successional wetland ecosystem, but reducing to not significant by operation, when the new wetland habitat is established.
- 7.104 The ES confirms that the majority of significant adverse residual ecology and nature conservation effects can be avoided after mitigation, particularly through the creation of the significant new wetland ecosystem in the Lake Zone secured through the **Environmental Controls Document**, nevertheless some effects remain due to the nature of the existing Site and the use proposed.
- 7.105 There will be a loss of woodland habitats of up to 11.6ha, and reedbed habitats of up to 2.75ha, both of which are of moderate adverse significance at construction and reducing to not significant by operation, after which time new planting and habitats would have been established. Mitigation measures to address indirect effects during construction are predicted to be effective.
- 7.106 The Proposed Development also includes measures to protect riparian and aquatic habitats from disturbance and degradation, as set out in the **OCEMP**, including a 10m construction exclusion zone from the top of the bank of Elstow Brook; noise, vibration, lighting and biosecurity measures employed during construction to avoid negative impacts on species present in the brook; and sediment, pollution, and surface water run off controls in proximity to Elstow Brook and any hydrologically connected watercourses. Additional measures to enhance the riparian zone of the Elstow Brook are proposed, including grassland and scrub planting within the Riparian Zone, particularly in the Lake Zone where this is currently arable habitat. This is secured in the

Environmental Controls Document (Document Reference 6.16.0) As such there will be no deterioration of the WFD Elstow Brook habitats.

7.107 The assessment on protected species is a cautious worst case scenario. Impacts on protected species including bats, birds and terrestrial invertebrates will be mitigated through a series of measures including avoidance, provision of suitable offsets, translocation and provision of new habitat and in the majority of cases are reduced to not significant by operation, once new habitat is established. Nevertheless, some adverse effects remain after mitigation as follows:

- bats – foraging and commuting – moderate adverse during construction and operation;
- breeding birds (including Annex 1 EU Birds Directive/WCA Schedule 1 and SPI and/or BoCC5 Red Listed) – moderate adverse during construction;
- wintering birds – moderate adverse during construction; and
- terrestrial invertebrates – moderate adverse during construction.

7.108 The Proposed Development incorporates a positive ecological enhancement strategy to create new habitat to mitigate and compensate for effects on habitats and species. This has been successful at reducing effects to not significant for the majority of habitats and species, however, given the scale of the Proposed Development and the nature of the existing Site, some adverse effects remain, as listed above.

7.109 There are also proposed to be beneficial impacts to certain species as a result of the new wetland habitat creation including:

- otters – moderate beneficial impact during construction;
- fish - moderate beneficial impact during construction and operation;
- aquatic macroinvertebrates - moderate beneficial impact during construction and operation; and
- macrophytes (aquatic plants) - moderate beneficial impact during construction and operation.

7.110 A number of other measures are proposed to support the establishment and ongoing management of habitats within the Site. The management of new and retained habitats is described within the OLEMP, with management measures aiming to secure these areas and support the ongoing presence of high value habitats within the Site. Sections 3.6 and 3.7 of **Appendix 6.5 of the ES: OLEMP** set out the proposed habitat interventions for the Proposed Development. Figure 1 of the

OHCEP (Appendix 6.4 of Chapter 6 of the ES) provides the proposed layout of retained and created habitats.

7.111 In terms of harm to biodiversity, the proposal is not resulting in any harm to a nationally or internationally designated habitat. Moderate effects remain for woodland and reedbed habitats at construction, but reduce to not significant by operation, after which time new planting and habitats would have been established.

7.112 In terms of effects on species, there will be moderate impacts on foraging and commuting bats and breeding and wintering birds, and terrestrial invertebrates during construction, although only impacts on foraging and commuting bats remain at operation and the effects have been reduced as far as practicable through appropriate mitigation.

7.113 To compensate for the effects identified to breeding and wintering birds and terrestrial invertebrates, the Proposed Development will include woodland, scrub and wetland habitat. These habitats would be managed in the long term as outlined in the **OLEMP** and secured by the **Environmental Controls Document (Document Reference 6.16.0)** and as a result the effects are reduced to not significant by operation.

7.114 The effects identified for bats cannot be compensated for, but effects have been adequately mitigated to moderate levels.

7.115 The Proposed Development is also resulting in a beneficial impact to otter, fish, aquatic macroinvertebrates and macrophytes (aquatic plants) as a result of the creation of the new wetland habitat.

7.116 The Proposed Development is not compliant with the parts of the policy in the NPPF which seeks compensation where residual impacts remain after mitigation, because there are residual impacts to foraging and commuting bats which cannot be compensated for on site. This cannot be avoided as it is not possible to create suitable replacement habitat for foraging and commuting bats due to the nature of nighttime bat activity and compatibility with the proposed use. For similar reasons, the Proposed Development does not comply with the relevant parts of Policy 28S of the Bedford Local Plan 2030 in terms of ecology and nature conservation, as adverse impacts are not avoided. However, this should be balanced in ecology terms with the beneficial effects predicted through the delivery of the new wetland ecosystem and the species this supports. This is considered in relation to the overall planning balance in Section 9.0.

Cultural Heritage

7.117 **Chapter 10 of the ES (Document Reference 2.10.0)** provides an assessment of the Proposed Development on Cultural Heritage, including the historic environment and heritage assets and archaeology. A detailed Heritage Impact Assessment is contained in **Appendix 10.1 of the ES: Historic Environment Desk-Based Assessment (Volume 3)**.

Historic Environment and Heritage Assets

7.118 The NPPF (para 212-216) states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. The NPPF requires clear and convincing justification where there is substantial harm to, or loss of, a designated heritage asset and that permission should be refused unless this is outweighed by the substantial public benefits of the proposal. Where there is less than substantial harm, this harm should still be weighed against the public benefits of the proposal. For non-designated heritage assets, any effect should be taken into account in determining the application, with a balanced judgement require having regard to the scale of any harm or loss and the significance of the asset. This national policy is reflected in Policies 29 and 41S of the Bedford Local Plan 2030.

7.119 In addition the Planning (Listed Building and Conservation Areas) Act 1990 confers a statutory requirement under Section 66(1) and 72(1) for developments to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses; and requires that special attention to be paid to the desirability of preserving or enhancing the character or appearance of a conservation area - duties to which considerable importance and weight must be afforded in decision making.

7.120 The Site does not contain any nationally designated (protected) heritage assets, such as scheduled monuments or listed buildings. However, there are above ground heritage assets in the environs that are potentially impacted through changes to their setting. A 5km study area was defined using professional judgement, liaison with the landscape team and statutory consultees, utilisation of the Zones of Theoretical Visibility (ZTV) and informed by the site visits. Several assets beyond 5km were also included on a case-by-case basis where appropriate.

7.121 The key heritage impact was identified for above ground heritage assets during the operational phase. The adverse effects to above ground heritage assets will arise due to the presence of the

Proposed Development in a currently rural landscape, which has remained open and largely undeveloped (with the exception of the works associated with the brickmaking industry in the northern part of the Site) for many hundreds of years. The introduction of new built form into this landscape will affect the significance of above ground heritage assets, due to changes in their setting and how the assets are understood and appreciated.

7.122 The Proposed Development has sought to avoid impacting heritage assets and proposes a number of mitigation methods to address any residual impacts as outlined in **Chapter 9 – Noise and Vibration of the ES (Document Reference 2.9.0)** (on the basis that these also mitigate cultural heritage effects) and in **the Design Standards (Document Reference 6.3.0)** relating to lighting (SW5.1-5.5, CZ5.1 and LZ5.1-5.3).

7.123 In terms of compliance with the NPPF and the requirements under the Planning (Listed Buildings and Conservation Areas) Act 1990, the ES identifies that there are a number of significant residual adverse effects on the setting of heritage assets as a result of the Proposed Development with a minor adverse impact on a historic hedgerow in the centre of the Core Zone (being a non-designated heritage asset) which will be required to be removed during construction.

7.124 The predominating impacts of significance relate to the operation of the Proposed Development with moderate adverse effects identified to the setting of several heritage assets⁵ as a result of the changes in the setting and how they are understood and experienced. The assessment confirms that this does not relate to substantial harm (whereby substantial harm is equivalent to a major adverse effect) and so paragraphs 213 and 214 of the NPPF are not engaged. In terms of the Planning (Listed Buildings and Conservation Areas) Act 1990, the requirements set out the desirability of preserving the setting heritage assets. However, some harm, although not substantial, is predicted and the implications of which are addressed in the Planning Balance.

7.125 Paragraph 215 of the NPPF provides guidance on where development leads to less than substantial harm to a designated heritage asset and requires that such harm should be weighed against the benefits of the proposal. In this case, the Proposed Development includes very substantial benefits

⁵ Moderate adverse effects are predicted during construction and operation at Kempston Hardwick Moated Site, Houghton House, Ampthill Castle, Ampthill, Wootton, Stewartby and Elstow Conservation Areas, Park House, Katherine's Cross), Parish Church of St Mary the Virgin, Wootton House and former stables, The Old Bakehouse, 23 and 25 Church Road, 21 and 23, Church Row, Wootton War Memorial, The Old Post Office, 7, Church Road, 2-8 Church Road, 3 and 5, Cranfield Road, Sir Malcolm Stewart Trust Homes, seven lamp standards and wrought-iron railings (Grade II listed), Sir Malcolm Stewart Trust Common Room, Church of All Saints, Hillersdon Mansion and Elstow Manor House, Parish Church of St Mary and St Helena and Parish Church Tower).

in terms of the provision of a significant number of jobs during construction and operation, an influx of expenditure which would kick start the transformation of the local area and region and the delivery of strategic and local transport infrastructure. This is considered to more than outweigh the less than substantial harm identified to heritage assets and therefore the Proposed Development complies with paragraph 215 of the NPPF and the relevant parts of Policy 29 and 41S of the Bedford Local Plan 2030.

7.126 The loss of the historically 'important' hedgerow during construction is a moderate adverse effect (significant), becoming a minor adverse with mitigation (not significant), although the hedgerow is not a designated heritage asset and so the NPPF tests on substantial harm are not engaged. A balanced judgement is therefore required on the scale of the harm or loss and the significance of the heritage asset, in accordance with paragraph 216 of the NPPF. Chapter 10 confirms that this is a mature historic hedgerow within the Core Zone, which marks a north-south boundary between the historic parishes of Kempston and Wootton, and is likely an ancient boundary of medieval period. Little remains of the historic landscape within the Site. Many of the former field boundaries were removed as fields were consolidated in the 20th century. One surviving long curvilinear field boundary, marked by a mature hedgerow, is however of heritage interest. The boundary bisects the Core Zone from southeast to northwest (see **Figure 2g of Appendix 10.1: Historic Environment Desk-Based Assessment (Document Reference 4.10.1.0)**). This forms the boundary between the historic parishes of Kempston and Wootton and is likely of medieval date. The hedgerow is historically 'important' under The Hedgerow Regulations 1997. Whilst it is not a designated asset, it is afforded protection under the Regulations and is considered by professional judgement, in Chapter 10 of the ES, to be a heritage asset of medium significance. Its rural setting makes a high contribution to significance. The removal of the hedgerow during the construction phase would result in a permanent, residual minor adverse effect ('total loss of significance' in NPPF terms).

7.127 In terms of the policy considerations against paragraph 216 of the NPPF, the scale of loss is total and the significance of the heritage asset is medium. This is weighed in the Planning Balance in Section 9.0 of this Planning Statement.

Archaeology

7.128 The Site lies in a low-lying area that was well settled in the past. Geophysical survey followed by archaeological trial trench evaluation has identified at least four discreet multi-phased Iron Age and Roman settlements within the Site. In the Core Zone, these lie beside a north-south trackway, within a network of smaller trackways and field systems that extend into the West Gateway Zone.

The Lake Zone has evidence of further Iron Age and Roman settlement, along with cremation burials.

7.129 The Proposed Development has sought to avoid impacting heritage assets and proposes a number of mitigation methods to address any residual impacts. To mitigate the impact, the Proposed Development will include (as set out within the **Environmental Controls Document (Document Reference 6.16.0)**):

- preservation by record through a programme of targeted archaeological excavation and recording of significant archaeological remains (e.g. settlement activity and burials) in advance of construction. A programme of community outreach is included;
- a targeted archaeological watching brief for those areas in other parts of the Site not covered by the targeted archaeological excavation and recording; and
- an archaeological watching brief (monitoring) during any construction or ground disturbance activity to make sure that any previously unrecorded remains of lesser significance are not removed without record.

7.130 With the above mitigation measures in place, residual effects upon buried archaeology are not considered to be significant and equate to less than substantial harm. The Proposed Development therefore complies with paragraph 207 of the NPPF in relation to the provision of an appropriate desk-based assessment or, where necessary, a field evaluation.

7.131 In terms of paragraph 216 of the NPPF, the predicted impact on buried archaeology is less than substantial harm to a non-designated heritage asset. The planning balance in Section 9.0 considers how this should be balanced in overall consideration of the Proposed Development.

Active Travel

7.132 The NPPF seeks to ensure that development takes appropriate opportunities to promote sustainable transport modes. The Bedford Local Plan 2030 also seeks to consider opportunities for access by pedestrians, cyclists and people with disabilities.

7.133 In addition, to the proposed infrastructure upgrades, the development of the Site provides the opportunity to improve active travel connectivity in the local area, and to connect the Site with Bedford, as shown on the **Parameter Plan: Active Travel (Document Reference 1.12.0)**.

7.134 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 to enable these connections in a way that will allow easy active travel connection to Bedford and facilitate

improvements within the Site that could connect in the future to the other surrounding villages, should Bedford BC choose to improve these links as part of their proper planning of the wider area.

7.135 The improvements to the local active transport network that the Proposed Development would deliver are consistent with Paragraph 115a of the NPPF, which states that it should be ensured that sustainable transport modes are prioritised taking account of the vision for the site as well as the type of development and its location.

7.136 The Proposed Development will meet relevant requirements in terms of accessibility as set out in the **DAS (Document Reference 6.2.0)**. UDX is committed to creating a theme park experience that is inclusive and accessible to everyone, ensuring that all guests can embark on unforgettable journeys regardless of their abilities. Further information is provided in the **DAS**.

7.137 The Proposed Development therefore complies with national and local policy on active travel.

Agricultural Land

7.138 The NPPF states that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. Policy 46S of the Bedford Local Plan 2030 seeks to maximise the delivery of development through the reuse of suitably located previously developed land provided that it is not of high environmental or biodiversity value and reflects national policy in preferring the use of poorer quality land to best and most versatile agricultural land.

7.139 **Chapter 11 of the ES (Document Reference 2.11.0)** provides an assessment of the Proposed Development on Ground Conditions and Soils.

7.140 The Site is partially brownfield and partially agricultural land. Pursuant to the NPPF, where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

7.141 In relation to agricultural land, an Agricultural Land Classification (ALC) has been undertaken for the majority of land within the West Gateway Zone and Core Zone while pre-1988 mapping has been reviewed for all other areas within the Site Boundary. The unsurveyed areas of the Core Zone and West Gateway Zone represent two very small areas of land, one being part of the A421 and the other a small area of vegetation to the west of the Cemex plant on Manor Road. The part in the A421 is not in agricultural use (being a road) and the area of vegetation to the west of the Cemex plant is not in agricultural use (it is an area of trees and grassland) and is shown as being in non-agricultural use in the Natural England 2010 ALC mapping (Natural England (2010) *Agricultural Land*

Classification map Eastern Region (ALC008) (24th August 2010) Available at <https://publications.naturalengland.org.uk/publication/127056?category=5954148537204736>

Accessed 28/05/2025.

- 7.142 The detailed ALC survey determined that 12ha of ALC Grade 3a soils are present within the Core Zone. Soils classified as Grade 1, 2 or 3a are considered to be Best and Most Versatile (BMV) agricultural land. In addition, 104ha of Grade 3b (non-BMV) is present across the remainder of the Core Zone and West Gateway Zone. The detailed survey did not cover the Lake Zone or the East Gateway Zone, however this whole area is identified as non-agricultural in the Natural England mapping (see reference in paragraph 7.146). **Chapter 11 of the ES (Document Reference 2.11.0)** notes however that a site walkover confirmed that the field to the north of the Lake Zone is used for agricultural purposes and covers an area of approximately 31ha. The Chapter goes on to note that Post-1988 ALC mapping indicates that Grade 2 (BMV) and Grade 3a (BMV) soils are present in the area and therefore may be present within the Lake Zone although is highly unlikely to cover the entire field. Historical mapping also indicates the southern portion of this field was previously a river which was since infilled. However, considering a worst-case assessment it is assumed that the entirety of this field is BMV.
- 7.143 Therefore, the total area of BMV land (ALC Grade 3a) required for the Proposed Development is approximately 43ha all of which will be permanent land take. This includes the 31ha in the Lake Zone which a cautious worse case has assumed is all BMV agricultural land. The remainder of the soils within the soil study area are Grade 3b (non BMV) or non-agricultural.
- 7.144 Construction activities associated with the Proposed Development will result in adversely impacting underlying agricultural soils by the compaction, sealing and loss of potentially productive/valuable agricultural land. The impact to soils beneath the footprint of the Proposed Development will be permanent while impacts to soils within areas of temporary construction works may only be temporary and could be subject to a period of restoration.
- 7.145 It is considered that the small loss of 43ha of BMV agricultural land (the majority of which is in the Lake Zone and is assumed to be BMV on a cautious worst case scenario) meets the NPPF requirement to minimise loss of BMV land. To put this in context, this area represents 0.06% of the

arable resource of Bedfordshire and 0.14% of the arable resource in Bedford Borough⁶. The Proposed Development also complies with Policy 46S of the Bedford Local Plan 2030 in that it is proposing the re-use of previously-developed land and is minimising the use of BMV land through predominantly being located on non-BMV agricultural land.

Greenhouse gases, sustainability and renewable energy

7.146 Paragraph 161 of the NPPF states that the planning system should support the UK's trajectory towards net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. Paragraph 163 of the NPPF states the need to mitigate and adapt to climate change should also be considered in preparing and assessing planning applications, taking into account the full range of potential climate change impacts. Paragraph 164 goes on to state that new development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design.

7.147 This may include consideration of:

- Whole life carbon assessments, covering embodied and operational carbon emissions;
- Energy efficiency measures (e.g. space heating demand; energy use intensity and renewable energy generation); and
- Scope 3 emissions (indirect emissions that occur in the upstream and downstream activities of an organisation (e.g., waste disposal, employee commuting).

7.148 Policies 55 and 57 of the Bedford Local Plan 2030 state that applications should consider opportunities to establish a district heating network and that proposals for development involving the provision of renewable and/or low carbon energy generation will be supported, subject to the acceptability of their wider.

7.149 Chapter 14 of the ES provides an assessment of the likely significant effects of the Proposed Development on Greenhouse Gases.

7.150 The following assessments have been undertaken and information provided within the ES to demonstrate consideration of the full range of potential climate change impacts:

⁶ Bedfordshire has 69,0739ha of arable land as reported in Natural Capital Solutions (2021) Bedfordshire Natural Capital Assessment: Part 1: Mapping, valuation, and opportunities for enhancement across Bedfordshire, prepared on behalf of Bedford Borough Council, Central Bedfordshire Borough Council and Luton Borough Council

7.151 The GHG assessment in Chapter 14 confirms that a whole-life carbon approach has been used to determine significant effects on climate, based on an evaluation of potentially significant sources of GHG emissions during the Construction Phase (embodied carbon) and ongoing GHG emissions during the Operational Phase, including consideration of indirect GHG emissions in the operational phase (with respect to visitors using air travel). Sources of GHG emissions considered over the lifetime of the Proposed Development are aligned with the lifecycle stages described in the guidance for the PAS 2080:2023 Standard for Carbon Management in Buildings and Infrastructure. This includes accounting for energy efficiency measures within the assessment of Operational Energy Use (B6) and accounting for GHG Protocol Scope 3 indirect emissions within the relevant operational lifecycle stages B1-B5, B7 and B8, commensurate with the level of information available for the design at this stage. In accordance with IEMA guidance for delivering a proportionate approach for assessment of effects from GHG emissions, Chapter 14 identifies that the following lifecycle stages were scoped out of the assessment: Land-use change during construction (A5) and operation (B1) and End of life stage emissions (C1-C4), as these were not considered to give rise to likely significant effects requiring assessment.

7.152 The GHG chapter includes contextual assessment against the UK's currently available national carbon budgets (Table 14-9: 4th, 5th and 6th carbon budgets), with text confirming that the project's emissions represent <0.05% for each of the relevant budget periods. For completeness, the seventh UK carbon budget proposed by the Climate Change Committee in February 2025 is included in Table 14-9; however, it is noted that this is not yet the legally binding carbon budget for its period. DCMS has provided confirmation (in the letter provided at **Appendix 10**) that:

- carbon budgets are set nationally, and Government does not usually assess individual projects against them;
- the methodology UDX have used is acceptable and enables consideration of the emissions in the context of the carbon budgets; and
- the commitments made by UDX will contribute to the UK's trajectory to Net Zero by 2050.

7.153 Chapter 14 identifies a series of mitigation measures to reduce GHG emissions arising from the Construction and Operation Phases of the Proposed Development. This includes the measures set out in the Carbon Management Plan (**Appendix 14.1 of the ES, Volume 3, Document Reference 4.14.1.0**), which demonstrates how the components of the Proposed Development for which UDX is the relevant Undertaker will align with the PAS 2080 standard, demonstrating that mitigation measures are in place consistent with applicable existing and emerging policy requirements and

good practice design standards, being in line with measures necessary to achieve the UK's trajectory towards net zero (as per IEMA criteria for determining a Minor adverse (not significant) effect).

7.154 These carbon management measures are delivered via the Carbon Management Plan (CMP), secured in the **Environmental Controls Document (Document Reference 6.16.0)**. This will enable carbon reduction targets, once committed to, to be tracked.

7.155 The CMP is a live document which will be updated by the relevant party(s) at the start of each RIBA Stage (e.g. Spatial Coordination (RIBA 3), Technical Design (RIBA 4) and Manufacturing and Construction (RIBA 5)). The CMP is currently written for the initial development phase including construction of the ERC. After this, it is intended that this CMP will be updated, as appropriate, for subsequent additional development phases. Carbon will be reported and tracked through design and delivery to provide visibility of the carbon management practices.

7.156 Construction mitigation measures will be secured through verification by relevant independent third-party certification bodies accredited to provide assessment of compliance with LEED certification and the PAS 2080:2023 standard.

7.157 Operational mitigation measures will be managed by organisations accredited to provide assessment of compliance with LEED certification and the PAS 2080:2023 standard. UDX has made a commitment that the detailed design achieves LEED Gold certification for Cities and Communities for the entire Proposed Development as secured by the **Environmental Controls Document (Document Reference 6.16.0)**. Chapter 14 of the ES confirms that where significant effects have been identified, the proposed mitigation measures will reduce these to not significant.

7.158 UDX can influence but not control the road and rail-related works, however both National Highways and Network Rail are certified to PAS 2080 and must produce their own Carbon Management Plans aligned to PAS 2080 for those elements of the Proposed Development.

7.159 A district heating and cooling network utilising low carbon technologies has been considered for the Proposed Development. Low carbon energy will be supplied from a more efficient centralised energy centre distributed by pre-insulated buried pipe networks to supply low temperature hot water and chilled water to the Proposed Development. A centralised energy centre can provide higher levels of resilience by taking into account diversity in thermal energy demands in heating and cooling systems which can help to reduce peak demands and consumption using heat recovery between systems. Further details are provided within the **Energy Statement (Document Reference 6.9.0)**.

7.160 The Proposed Development includes 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). Any BESS would be designed and constructed in accordance with UK guidelines/requirements, including appropriate fire safety measures and defined exclusion zones and is controlled by the **Design Standards (Document Reference 6.3.0)**.

7.161 On this basis, the Proposed Development is considered to accord with paragraphs 161, 163 and 164 of the NPPF and policy 55 and 57 of the Bedford Local Plan 2030.

7.162 Given the stage of design, it is not yet possible to commit to a specific reduction in carbon emissions. However, PAS 2080:2023 will be used to determine whether the project is on track to meet any reduction target set and identify any carbon hotspots in the design and delivery of the project. On this basis, the Proposed Development is considered to accord with Policy 54 of the Bedford Local Plan 2030 on energy efficiency, which seeks a 10% reduction in carbon emissions below the Building Regulation requirement, unless it would make the development unviable.

Climate Resilience

7.163 Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 of the NPPF outlines the overarching objectives, which includes an environmental objective:

7.164 *c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

7.165 Paragraph 161 of the NPPF states that the planning system should support the UK's trajectory towards transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change.

7.166 Policy 51S of the Bedford Local Plan 2030 states that the Council will require the development and use of land and buildings to address climate change, adapting to anticipated future changes and mitigating against further change by reducing greenhouse gas emissions.

7.167 Chapter 15 of the ES considers the impacts of climate change on the Proposed Development.

7.168 A number of embedded design mitigation measures to ensure the resilience of the Proposed Development in respect of climate change will be incorporated into the design and are detailed in

Table 15-9 within Chapter 15 of the ES. They will be controlled through applicable **Design Standards (Document Reference 6.3.0)** and the **Environmental Controls Document (Document Reference 6.16.0)**, which includes measures such as:

- Buildings will be raised above the base flood elevation to reduce the risk of inundation.
- During the design of buildings and structures, including utilities and services (with the exception of the Theme Park), due regard will be given to the temperatures, heavy rain fall events, and wind speeds projected for the local area by UK Climate Projections (UKCP) 18 (Design Standard SW4.4).
- When undertaking design review of the applicable Entertainment Resort Complex components in accordance with the Health and Safety Executive (2017) *Fairgrounds and amusement parks: Guidance on safe practice (Third edition) (as may be revised from time to time)* Available at <https://www.hse.gov.uk/pubns/books/hsg175.htm>, UDX will also include in its:
 - (i) design calculations - consideration of wind speeds and temperatures for the local area as projected in UKCP18;
 - (ii) design risk assessment - consideration of materials that are suitably resilient to high temperatures and high winds of the type projected for the local area in UKCP18; and;
 - (iii) operating instructions to be used during operations of the particular component - consideration of component fatigue, life and weather restrictions suitable for the local area climate projections in UKCP18 (Design Standard CZ4.1).
- Parking and hardscape materials will be specified with a high solar reflectance index (SRI) to help reduce the heat island effect, except in theme park themed hardscape areas (Design Standard SW4.2).

7.169 In terms of water scarcity, the Water Strategy confirms the measures committed to by the Promoter to re-use and recycle water within the Site to meet the non-potable water demand, secured by controls in the **Environmental Controls Document (Document Reference 6.16.0)** The Promoter has agreed with Anglian Water that it will meet the domestic potable water requirements of the Proposed Development. Anglian Water have provided 2no. points of connection to meet the domestic potable water requirements:

- Bedford, Manton Lane Reservoir via connection to the AW 630mm PE (polyethylene) main located at the A6 Cemetery Road junction (TL0135247633).

- Ampthill Reservoir via connection to the AW 750mm steel main near that location (TL0268444684).

7.170 The routings of any proposed potable water connections are inchoate and are still to be properly determined, however AW have confirmed that they will be able to meet the needs of the Proposed Development. This agreement is recorded in the SOAP at **Appendix 4** of this Planning Statement.

7.171 Following mitigation, no residual effects were identified in terms of Climate Resilience and therefore the Proposed Development is considered to accord with the policies in the NPPF and Bedford Local Plan 2030 on climate resilience.

Flood Risk and Drainage

7.172 Section 14 of the NPPF seeks to avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Policy 92 of the Bedford Local Plan 2030 is reflective of this national policy requirement.

7.173 **Chapter 12 of the ES: Water Resources (Volume 1)** provides an assessment of the likely significant effects of the Proposed Development on Water Resources.

7.174 The Water Framework Directive (WFD) has also been considered within **Chapter 12: Water Resources (Document Reference 2.12.0)**. The chapter includes details of the WFD screening scoping submitted to the EA for works to Elstow Brook, a consideration of WFD groundwater bodies (whereby WFD groundwater bodies is scoped out of the assessment), a review of WFD quality and chemical status and recognition of River Basin Management Plans which form part of the WFD. The Proposed Development has been designed to comply with the objectives of WFD as shown in **Water Framework Directive Assessment (Document Reference 6.15.0)** and summarised in Chapter 12. Chapter 12 confirms that based on the embedded mitigation included, there will be no deterioration to the WFD status and future objectives, and any temporary impacts will be negligible.

7.175 A portion of the Site is located within the Flood Zone 2 and Flood Zone 3. There are also a number of existing water bodies within and adjacent to the Site. The Lake Zone has a small area to the northern edge located in Flood Zone 2 and Flood Zone 3 adjacent to the Elstow Brook and A421. The West Gateway Zone has a large area in Flood Zone 2 and a small area in Flood Zone 3, consistent with the location of Elstow Brook.

7.176 The Core Zone and East Gateway Zones are located entirely within Flood Zone 1 and therefore have a low probability of flooding from fluvial sources.

7.177 The online EA Long Term Flood Risk map and the Bedford BC Level 2 Strategic Flood Risk Assessment (SFRA) Mapping identify that there is a very low risk of surface water flooding across the majority of the Site.

7.178 A Flood Risk Assessment (FRA) has been undertaken and a Drainage Strategy produced and is included at Appendices 12.1 and 12.3 of the ES (Volume 3). The FRA and Drainage Strategy demonstrates how foul water and surface water runoff is to be managed and that there will be no increase in on or off site flood risk as a result of the Proposed Development.

7.179 The FRA details flood risk mitigation measures required to manage the identified flooding risks. The report confirms development will be allocated on a sequential basis against flood risk, with the most vulnerable land uses allocated to the areas at the lowest risk of flooding. The mitigation measures include:

- Finished site levels will be designed to provide positive drainage, prevent ponding and channel flows away from the Proposed Development during exceedance events.
- Road levels for all access and egress routes are proposed to be set at a minimum of 600mm above the maximum expected flood levels for surface water and fluvial sources in the 1 in 100-year probability plus climate change and above the maximum 1 in 1000-year modelled flood level. These routes will not impede surface water flow through the Site, as appropriately sized bridges or culverts will be installed where necessary to maintain continuity of flow
- Areas identified as Flood Zone 3b from the SFRA (functional flood plain) are to be developed as a landscaped Ecological Enhancement Area only which will not affect the flood plain or create any increase flood risk.
- Where development is proposed within Flood Zone 3a, to the north of the Lake Zone, ground levels will be raised and any floor levels will need to be set at a sufficient height above the peak flood levels to give protection. Public Road B, proposed within the lake Zone, is to be set 600mm above maximum flood levels to ensure safe access and egress. Raising ground levels within an area of Flood Zone 3a will require flood compensation elsewhere within the Site, to ensure there is not an increased risk of flooding off-site.

- All buildings within the development will have raised thresholds above the external levels to mitigate against surface water flooding.

7.180 The FRA does not rely on any mitigation measures that would require active maintenance.

7.181 The Drainage Strategy demonstrates that the drainage network at the Site is designed to accommodate runoff during all events up to and including the 100 year plus 40% climate change scenario, preventing potential exceedance flows off-site. Drainage exceedance routes have also been considered and allowed for as part of the development of parameters to make sure that any surface water runoff exceeding the drainage network capacity would naturally flow away.

7.182 The FRA and Drainage Strategy conclude that in terms of flood risk and drainage, the Proposed Development is sustainable and complies with the NPPF and Local Plan policies on flood risk.

Sequential and Exception Test for flood risk

7.183 The NPPF aims to steer new development to areas at lowest flood risk through the application of the Sequential Test to avoid, where possible, flood risk to people and property (including future flood risk). Only following the application of the Sequential Test should the Exception Test be applied, if necessary, to manage any residual risk.

7.184 The Sequential Test and Exception Test has been undertaken and are provided in the FRA.

7.185 The Sequential and Exception Tests confirms the following:

- Proposed Development within the Site has been allocated following a risk-based approach, steering the most vulnerable development away from areas at the highest risk of flooding based on the flood vulnerability classifications under the NPPF.
- Proposed Development has been allocated to Flood Zone 1 areas as a priority, which includes the Theme Park in the Core Zone solely within fluvial Flood Zone 1. Proposed Development located in the Lake Zone and West Gateway Zone has been arranged prioritising Flood Zone 1, with only essential infrastructure (spine roads), more vulnerable (visitor accommodation) and water compatible (landscaped space) proposed in Flood Zone 2 and 3.
- The Proposed Development does not include highly vulnerable land uses as classified under the NPPF.

7.186 Consideration has been given to the location of the Site and alternative viable sites that may have a lower risk of flooding. As set out in Section 6.2 of the **Flood Risk Assessment (Appendix 12.1 of the Environmental Statement, Document Reference 4.12.1.0)** the site selection process and

criteria found that there were no reasonably available sites with a lower risk of flooding compared to the proposed Site. The Proposed Development has also been configured to respond to the varying flood risk of the Site avoiding locating more sensitive uses in higher risk areas of the Site, as set out in **Chapter 12 (Water Resources) (Document Reference 2.12.0)**.

7.187 The proposed location of more vulnerable development (visitor accommodation) and essential infrastructure (spine roads) in Flood Zone 3a requires the Exception Test to be applied. To pass the Exception Test it needs to be demonstrated that:

“the development would provide wider sustainability benefits to the community that outweigh flood risk; and, the development will be safe for its lifetime taking account of the vulnerability of users without increasing flood risk elsewhere, and where possible reducing flood risk overall.”

7.188 The Proposed Development provides a range of wider sustainability benefits to the community that outweigh flood risk. The purpose of the Proposed Development is to provide an ERC which will be a world-class tourism destination of which there is currently no comparable in the UK. The Proposed Development will provide socio-economic benefits to the local area and region and support the delivery of important transport infrastructure.

7.189 The FRA demonstrates that the Proposed Development will not increase flood risk to third parties when compared to the baseline scenario, both for the present day and in the future when climate change is considered.

7.190 Based on the above, the Proposed Development satisfies both the Sequential and Exception Test in relation to flood risk, and accords with paragraph 173 and 175 of the NPPF.

Ground conditions and soils

7.191 The Ground Conditions and Soils Assessment confirms there are not considered to be any likely significant effects regarding ground conditions and soils during the Operation Phase as it is anticipated that any contamination identified during the Construction Phase will be remediated in line with national and local planning policy upon consideration of the proposed end use.

7.192 A Soil Resource Survey (as set out in the **OCEMP**) will be undertaken to inform how soils across the Proposed Development may best be managed, protected or re-used.

7.193 Potential effects associated with construction activities impacting agricultural soils during the Construction Phase. A Soil Management Plan would be produced prior to any enabling or construction works commencing as part of the detailed CEMP relevant to that phase of the

Proposed Development. This will describe best practice methods to reduce impacts to soil during handling and would be informed by site-specific soil and climatological data. In addition, best practice construction methods would be included in the detailed CEMP to provide methods of minimising the loss or reduction of soil functions.

Minerals and waste

7.194 Although the Site was historically worked for minerals, there is no ongoing minerals extraction at the Site.

7.195 NPPF paragraph 225 states that *“Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.”*

7.196 The whole Site is identified as a Minerals Safeguarding Area (MSA) in the 2014 MWLP:SSP for Oxford Clay, which is covered by policies MSP11 and MSP12. MSP11 requires that *“surface development proposals within a Mineral Safeguarding Area (excluding exemptions set out under policy MSP12: Surface Development within a Mineral Safeguarding Area) shall be accompanied by a Minerals Resource Assessment. This shall be undertaken by a suitably qualified professional, which establishes through site specific geological survey data, the existence or otherwise of a mineral resource of economic importance.”* Note the exemptions apply to minor and short-term development and none apply to the Proposed Development.

7.197 A **Mineral Resource Assessment (MRA)** has been prepared and is provided at **Document Reference 4.11.3.0**. This concludes that:

- the permitted extraction of the remaining minerals on-Site will not go ahead as the mineral is deemed of no economic value due to the carbon and sulphur content within the Peterborough Member which means production cannot comply with UK Air Quality Standards;
- existing sites and allocated brick clay extraction sites (specific to Oxford Clay extraction) are estimated to contain 38.7 million cubic meters of clay off-Site across six sites within 5km of the Site. It is identified that demand for brick clay has been very limited, therefore, these sites enable the area to meet any unforeseen demand to be met; and
- following investigation, the entire Site is designated in “Zone 1” (a designation given by WSP which is outlined in section 4 of the MRA, and who are the technical author of this assessment) and deposits have been shown to be unsuitable for extraction as the material

doesn't comply with a typical brick earth specification comprising a sand content of 35-50%, a silt content of 20-35% and a clay content 20-30%.

7.198 Central Bedfordshire, Bedford Borough and Luton Borough Councils' produced a Minerals and Waste Monitoring Report in 2023 which confirms that the position set out in the MRA is correct:

"Historically Clay from the Marston Vale supported the brick manufacturing industry, however since the closure of Stewartby Brickworks demand for Clay has been very limited. Occasionally proposals arise for clay extraction for use in engineering works.

In addition to the six sites listed above there are also significant unpermitted resources of Clay within the Marston Vale area (based on BGS information) and as such there is the potential to deliver substantially more Clay in the future, should an economic reason arise."

7.199 The evidence provided by the MRA (and confirmed by the Minerals and Waste Monitoring Report) therefore shows that the Proposed Development complies with Policy MSP11.

7.200 MSP12 states that surface development will only be permitted in an MSA where it has been demonstrated that:

- the mineral concerned is proven to be of no economic value as a result of the undertaking of the Mineral Resource Assessment; or
- the development will not inhibit extraction if required in the future; or
- there is an overriding need for the development and prior extraction cannot reasonably be undertaken; or
- the mineral can be extracted prior to the development taking place.

7.201 The MRA confirms that the mineral concerned is of no economic value and therefore the first limb of this policy is met. Even if this were not the case, Section 2.0 of this Planning Statement has identified an overriding need for the Proposed Development. The Proposed Development includes significant regrading of the Site. This includes moving existing material from the Lake Zone to the Core Zone. If the minerals were to be extracted prior to construction commencing, a significant volume of material would need to be imported to the Site, thus significantly increasing traffic movements during construction, and this would add years to the construction programme. Minerals extraction cannot therefore be reasonably undertaken prior to construction commencing. Furthermore, it would not be economical to do so as there is currently very limited economic demand for the Oxford Clay. The explanatory text to Policy MSP11 recognises that the mineral

resource may be allowed to be sterilised in these circumstances. The Proposed Development therefore complies with the first, third and fourth criteria of Policy MSP12.

7.202 The MWLP:SSP identifies the Elstow Aggregate Railhead & Asphalt Plant to the east of the site and strategic site at Elstow North which comprises a permitted waste site. The Proposed Development will not restrict the use of these sites or impact upon their safeguarding.

7.203 The Proposed Development therefore also complies with NPPF paragraph 225, for the same reasons given above.

Water resources and demand

7.204 The NPPF states at paragraph 161 that: *“the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change”*.

7.205 **Chapter 12 of the ES (Document Reference 2.12.0)** provides an assessment of the likely significant effects of the Proposed Development on Water Resources. Details of operational demand requirements for domestic and process water, along with sustainable sources of water supplies are provided in the **Water Strategy (Appendix 12.2 of the ES, Document Reference 4.12.2.0)**.

7.206 The water demand from the ERC is driven by the following two groups of uses

- Domestic water uses – associated with guests’ hospitality (including day and overnight stay) and employees welfare facilities; and
- Non-domestic uses – associated with irrigation and process water (e.g., park washdown and supply to water features other than fountains).

7.207 The **Water Strategy** confirms the water demand from the Site should be met through the combination of:

- implementation of water efficient fixtures and processes in line with Building Regulations and contributing to achieving LEED gold accreditation;
- a potable water supply (which Anglian Water has confirmed it can provide – see above). The potable water supply is to be used for domestic uses only; and
- a non-potable water supply, sourced from storage and treatment of rainwater harvested from the Site drainage water ponds’ catchment, including water run-off generated by washdown activities on the Site. The non-potable water supply is sufficient to meet all non-domestic use water demand including irrigation, park washdown and supply to water

features and attractions for the Opening Year and Final Buildout Phases. A localised closed-loop system should be installed to minimise water demand from the water features and attractions.

7.208 UDX is also committed to a series of water conservation measures which are contained within the text on “Water Conservation Opportunities” (Section 4 of Appendix 12.2 of the ES) and controlled by the **Environmental Controls Document (Document Reference 6.16.0)**. This sets out the water reuse, recycling and efficiency measures that UDX will deploy to meet LEED.

7.209 The **Water Strategy** proposes that any surplus of non-potable water is used to partially offset the potable water demand for water closet (WC) flushing, reducing it by 28% for the Opening Year. Based on the analysis, insufficient surplus is available to offset any WC flushing demand for the Final Buildout.

7.210 Domestic foul water will be discharged to Anglian Water’s sewer network. The water strategy assumes, pending trade effluent consenting from Anglian Water, that wastewater generated by the non-potable water treatment works and closed-loop systems can also be discharged to Anglian Water’s sewer network.

7.211 Chapter 12 of the ES summarises that there would be a residual moderate beneficial effect on the Kempston Hardwick Clay Pits receptor, as a result of the enhanced strategic SUDS feature and strategic rainwater harvesting wetland. There would also be a residual moderate beneficial effect on the existing watercourse in the Core Zone as a result of enhancement to vegetation, landscape and habitat as well as a reduction in on and off-site flood risk. No significant adverse effects are predicted.

Health

7.212 **ES Chapter 17: Population and Human Health (Document Reference 2.17.0)** considers effects on population and human health. UDX recognises that the scale of the Proposed Development is such that construction and operational impacts will have to be carefully approached in order to minimise potential impacts on health. The ES considers impacts on the following areas during both construction and operation (unless noted otherwise): demand for healthcare services; changes to noise and vibration; changes to air quality; changes to local traffic; changes to local public transport and active travel; presence of construction workforce (construction phase only); employment and training opportunities; effects on community from new sports provision (operational phase only); and access to healthy and unhealthy food (operational phase only).

7.213 Paragraph 198 of the NPPF requires that planning policies and decisions should ensure that *“new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.”* It continues to note that new development should *“mitigate that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development”*.

7.214 As explained earlier in relation to noise, UDX is committing to a series of measures to seek to address the effects of noise. During the Construction Phase, the Principal Contractor will employ Best Practicable Means (BPM) to limit construction noise and vibration at nearby sensitive receptors. During operation, noise limits are proposed to seek to mitigate impacts to acceptable levels.

7.215 The broadband noise limits are similar to those established for other UDX parks, namely:

- Universal Epic Universe: 60 dBA daytime; 55 dBA night-time
- Universal Studios Japan: daytime ranges from 60 dBA to 65 dBA; 55 dBA night-time

7.216 Some UDX parks are exempt from noise standards. In these cases, UDX self-regulates noise to mitigate impacts to adjacent residential communities. In its experience, noise levels consistent with those proposed for the Core Zone are sufficient to achieve such mitigation.

7.217 With the proposed commitments to noise limits, it is considered that an appropriate balance is achieved between mitigating impacts to acceptable levels and allowing the ERC to operate in a way which is consistent with UDX’s resorts around the globe.

7.218 Policy 2S of the Bedford Local Plan 2030 outlines that Bedford BC will support programmes and strategies which aim to reduce health inequalities and promote healthier lifestyle.

7.219 The Proposed Development is supported by **ES Chapter 17: Population and Human Health**, which doubles as a Health Impact Assessment (HIA). The HIA has been informed by and is in line with relevant guidance, including Determining Significance for Human Health in Environmental Impact Assessment and the Healthy Urban Planning Checklist. Section 5 of the **DAS (Document Reference 6.2.0)** outlines the Design vision and approach for the Proposed Development and includes a series of Site-wide design principles, which include to promote liveable and healthy places.

7.220 The significant employment and training opportunities that would be realised in the local area through the commitments that UDX is making in the **Employment and Skills Plan (Document Reference 6.12.0)** will also result in significant quality of life benefits. Active lifestyle benefits would also be accrued should the sports facility be delivered, but as this is not a commitment, this has not been considered in the overall Planning Balance.

7.221 Policy 97 of the NPPF states that local planning authorities should *“refuse applications for hot food takeaways and fast food outlets a) within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre; or b) in locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or anti-social-behaviour.”*

7.222 The Proposed Development is not within walking distance of schools, nor is it considered to be in a location where there is evidence that a concentration of hot food takeaways and fast food outlets is having an adverse impact on local health, pollution or anti-social behaviour. Whilst the permitted uses include hot food takeaways, on a site where young people would congregate, all hot food and takeaway facilities would either be part of the theme park(s), water park(s) and/or amusement park(s) or within the overall unified control of UDX, which will maintain overall standards and safety, including through the **Security and Emergency Management Plan (SEMP) (Document Reference 6.4.2)**.

Safety and security

7.223 Safety and security is addressed in the accompanying **Security and Emergency Management Plan**. A redacted version of the plan is provided, recognising the national security implications of some of the information contained within the plan. This plan sets out the Promoter’s approach to dealing with events both manmade and natural. Relevant policy in the NPPF at Paragraph 102 requires that planning policies and decisions:

“should promote public safety and take into account wider security and defence requirements by:

Anticipating and addressing possible malicious threats and natural other hazards (whether natural or man-made), especially in locations where large numbers of people are expected to congregate... the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies”.

- 7.224 This recognises the role of promoters to ensure that developments, particularly those which are designed to accommodate significant numbers of visitors, have sought to understand the various risks that may be present and plan appropriately for them.
- 7.225 Public safety and security will be managed by UDX. The Proposed Development is proposed to be managed through a unified control approach, whereby UDX will oversee all aspects Proposed Development, from initial planning and design and coordination of the infrastructure to construction of the ERC and master infrastructure to long-term management of the common area elements of the Proposed Development.
- 7.226 The **Security and Emergency Management Plan (Document Reference 6.4.2)** sets out the general approach to security in relation to both natural and manmade hazards and threats, including identification of organisations with which it will coordinate its more detailed operations plans. Further, the Promoter has had regard to the guidance provided by the National Protective Security Authority (which replaced the Centre for the Protection of National Infrastructure) as well as ‘Contest: The United Kingdom’s Strategy for Countering Terrorism’. CONTEST outlines the role the private sector has to play in preventing terrorism and that collaboration with the Government is critical in helping to protect, notably, public places and infrastructure.
- 7.227 The Promoter is committed to working with the appropriate authorities and recognises the importance of collaborative working to build both enjoyable and safe places for the public. The Promoter’s security and emergency planning will be continually updated to respond to the changing security environment and context.
- 7.228 There is an existing HSE consultation zone associated with a Liquefied Natural Gas (LNG) storage facility located at the Asda chilled distribution centre to the north-west of the Site. The consultation zone inner, outer and middle zones project into the Site and as such will impact the uses within this area. UDX has met HSE to discuss the implications of this and, on the basis that a detailed design or layout for this area has not yet been decided, has proposed Design Standards (LZ2.1 and LZ2.2) which requires the HSE Land Use Planning Methodology to be applied in this area.
- 7.229 This is considered to adequately ensure that the development comes forward in a way which is consistent with HSE requirements.

Summary of Planning Policy Assessment

7.230 The Proposed Development has clear compliance with many aspects of national and local policy in that it is:

- providing a significant new tourism destination of a type that is not currently present in the UK and that is strongly supported across all levels of national and local tourism policy;
- delivering significant socio-economic benefits to a region specifically identified for growth;
- redeveloping a significant brownfield site that was part of the former brickworks;
- expansion of the Wixams Rail Station site, which will enable the opportunity to serve the ERC as well as the local community;
- providing active travel links which will facilitate wider access to the local area by foot and cycle;
- delivering improvements to biodiversity, habitat or ecological enhancements through the EEA and significant additional tree planting; and
- delivering high quality new public realm that will be secured through the Design Standards and the post-decision approval process.

7.231 In terms of assessing and mitigating impacts, the Promoter has proposed several significant mitigation measures to seek to reduce the adverse environmental effects of the Proposed Development, including a substantial EEA, a generous landscaped buffer around the Site perimeter and Design Standards to control the way in which the detailed design will come forward. Nevertheless, it is a large development on a predominantly undeveloped Site.

7.232 For the majority of environmental effects, the Proposed Development anticipates effects that are not significant in EIA terms (and some significant benefits as identified above). However, there are some significant residual adverse effects remaining after mitigation in terms of:

- traffic and transport effects relating to non-motorised users amenity (Wootton and Woburn Road), driver delay (Fisherwood Road), and risk of accidents and safety (Broadmead Road);
- landscape and visual effects during construction and operation;
- noise during construction and operation, predominantly during the nighttime and special events scenarios;

- ecology in terms of woodland and reedbeds and a moderate adverse effects on breeding and wintering birds, commuting and foraging bats and terrestrial invertebrates, the majority of which are reduced to not significant by operation (once planting matures and habitats establish);
- above-ground heritage assets, although not resulting in substantial harm; and
- ground conditions and soils with respect to the permanent loss of approximately 43ha of BMV agricultural land.

7.233 Some of these effects have been identified on a cautious worst case basis as detailed design has not yet been able to determine precise mitigation measures, or simply because of the scale of the change to a site which is currently undeveloped and highly visible in the surrounding landscape.

7.234 In terms of policy compliance, in most cases the Proposed Development is either fully compliant with policy, or compliant with the intent of policy. For the purposes of completeness, the Proposed Development is considered not to comply with the following policies:

- Policies 28S (which seeks to avoid adverse effects on ecology, although it is considered to comply with the intent of the policy which is about creating positive, attractive new places).
- Policy 36S of the Bedford Local Plan which requires proposals within the Forest of Marston Vale area to demonstrate how they will deliver 30% tree cover – although it is possible that this may be met, UDX cannot commit to this in advance of developing a detailed landscaping scheme for the Site. It is considered however that the Proposed Development complies with the intent of this policy which is to achieve environmentally-led regeneration.
- Policy 37 (which seeks to protect landscape features) of the Bedford Local Plan 2030.
- Paragraph 193 of the NPPF (which seeks to avoid significant harm to biodiversity resulting from a development, or if not, that harm is adequately mitigated or, as a last resort, compensated for).
- Policy 7S of the Bedford Local Plan 2030 on the basis that it is introducing a major new use into a partly countryside location.

7.235 This is considered further in Section 9.0 when making conclusions on the Planning Balance.

8.0 OTHER MATERIAL CONSIDERATIONS

- 8.1 This section covers material considerations that may be considered as relevant to the decision maker, but which are not necessarily covered directly by planning policy.

Workforce management

- 8.2 Given that this will be a major construction project, it is important to ensure that workforce coming temporarily into the area during the Construction Phase is appropriately managed. Local communities may be concerned about the impact that a large number of, often male, workers who do not live permanently in the area may have on local services and in terms of the potential for anti-social behaviour.
- 8.3 UDX is proposing to address this through a proposed condition (Condition No. 6) relating to the provision of temporary workforce accommodation in the event certain triggers are met (see Temporary Workforce Accommodation Strategy (TWAS) (**Appendix 13.1 of the ES, Document Reference 4.13.1.0**)) and the Worker Code of Conduct (Section 2.4 of the OCEMP).
- 8.4 In this case, because of the nature of the area in which the Proposed Development is being carried out, a large percentage of construction workers are anticipated to be home-based and will therefore already be members of the communities that they live in. Nevertheless, UDX wish to ensure that construction workforce conduct themselves in a way which reflects the nature of the project and the Worker Code of Conduct will ensure that any unacceptable behaviour is addressed.
- 8.5 UDX's experience of constructing similar developments around the world suggests that the peak construction workforce count on Site will occur during the Primary Phase of construction and the current construction plans estimate that will peak at 5,380 workers.
- 8.6 Of the peak construction headcount, it is expected that approximately 855 workers will be non-UK based employees who will require temporary accommodation during their time in employment. Of the remaining 4,525 peak workforce, who are expected to be domestic workers, it is estimated that between 225 and 680 might require temporary accommodation.
- 8.7 The lower bound reflects the average non-home-based workforce for construction projects across the region and it is therefore likely that the demand for accommodation will be at least at this level. The higher bound reflects a cautious worst-case scenario given the size of the project and other construction projects also likely to be ongoing in the area over a similar timeframe.
- 8.8 When combining the number of non-UK based workers with the domestic construction workforce potentially requiring temporary accommodation, it is estimated that during the peak construction

period, the maximum total demand for temporary accommodation will fall within the range of 1,080 and 1,535 construction workers.

- 8.9 The TWAS examines the availability of accommodation stock within Bedford and Central Bedfordshire (the core study area – CSA) and then also including Luton and Milton Keynes (the sub regional context area – SRCA), including hotels and the Private Rental Sector (PRS), including affordability considerations.
- 8.10 The TWAS concludes that it does not seem likely that the PRS market will experience adverse effects as a result of construction workers requiring accommodation during construction of the Proposed Development. It also concludes that while there could be potential impacts on the visitor accommodation market if the cautious worst case scenario were to occur, such scenario is considered unlikely to materialise. In any event, to mitigate against the cautious worst case scenario being realised, it is proposed that a condition (Condition No. 6) is attached to any planning permission granted for the Proposed Development, which requires the Principal Contractor to monitor worker accommodation patterns and submit quarterly monitoring reports, and if such report determines that more than 535 serviced accommodation rooms within the CSA are being used by construction workers for the proposed Development, mitigation measures will be implemented, which could include an accommodation campus to house these workers.
- 8.11 On this basis, there is a clear strategy to address potential effects arising as a result of temporary construction workforce.

Impact on emergency services

- 8.12 UDX have a significant amount of experience in owning and operating ERCs. Providing for the health and safety needs of their employees and visitors is an essential part of their operating model. **Chapter 13 of the ES, Socio-economics (Document Reference 2.13.0)** considers impact on emergency services provision.
- 8.13 During construction, UDX will implement initial first aid treatment support services designed to provide timely response to a variety of commonly seen urgent/emergent injuries and illnesses presented by team members and contractors. Initial treatment will include basic first aid up to and including the application of basic life support. Basic life support means non-invasive emergency procedures applied to assist in the immediate survival of the patient including cardiopulmonary resuscitation (CPR), application of an automatic external defibrillator (AED), bleeding control, fracture stabilisation, and spinal immobilisation. If any emergencies arise this would be dealt with by external emergency services.

- 8.14 The socio-economics chapter considers the impact of construction of the Proposed Development on existing emergency services and finds that the impact on accident and emergency services across the area serviced by Bedfordshire Hospitals NHS Trust would be minimal and East of England Ambulance Service NHS Trust (EEAST) (which comprises Bedfordshire, Cambridgeshire, Hertfordshire, Essex, Suffolk, and Norfolk) would be even more minimal.
- 8.15 Fires on major construction projects in the UK are extremely rare due to stringent safety regulations and protocols enforced in the UK, including those outlined by the Health and Safety Executive (HSE) and building regulations that emphasise fire safety. UDX will ensure the Principal Contractor implements best practice measures in order to prevent major fire related accidents.
- 8.16 During operation, the theme park will have an onsite health services facility. This facility is staffed with medically trained first responders and medical staff to provide initial First Aid treatment if injuries/illness occur. In the event further medical assistance is required, this would be provided by external emergency services, although as noted in the paragraphs below, instances where this is required is low.
- 8.17 In the Operational Phase, the impacts on demand for emergency health services will largely be felt through two routes – more visitors (and workers) being temporarily in the area who may (infrequently) make use of services and workers who move permanently into the area who place increased demand for housing which in turn places pressure on services.
- 8.18 The socio-economic chapter finds that even in a worst case scenario where all potential accidents from workers and visitors attended accident and emergency services, this would equate to 0.9% of accident and emergency attendances across Bedfordshire Hospitals NHS Foundation Trust in March 2024.
- 8.19 The increase in demand for police and fire emergency services is further expected to be minimal.
- 8.20 It is rare for a fire to occur at a UDX entertainment resort complex. UDX is experienced in managing theme parks of the size and scale of the Proposed Development and has standard measures to prevent fires occurring. This includes regular inspections, fire drills, and close coordination with local fire departments. Based on the experience of UDX, it is expected that the increase in demands placed on the fire services during operation would be negligible.
- 8.21 UDX is experienced in minimising crime at their destinations across the globe. It is in their interests to minimise crime so as to maximise guest experience. High levels of security will be on Site at the

Proposed Development to minimise any crime, as set out in the **Security and Emergency Management Plan (Document Reference 6.4.0)**.

- 8.22 UDX is also highly experienced at building positive working relationships with local fire and police services and see this as an important part of their role in the local community. UDX also host training activities for local emergency services at certain of their locations, and would anticipate doing something similar here.
- 8.23 The overall conclusion reported in the socio-economic chapter is that the impact on emergency services during construction and operation would be minor/negligible.

People and communities

- 8.24 UDX recognises that it would be constructing and operating in an existing community and has vast experience of doing this in its operations around the globe. As an operator as well as developer, UDX understands its ongoing relationship with the community and takes this very seriously. If this Site is developed, UDX will become a permanent part of the community and many of its employees (and visitors) will live in the community. It therefore wants to be a good neighbour.
- 8.25 It is recognised that this is a transformative, large-scale project which will result in change to the local area. UDX has sought through the development of the Proposed Development to date, including limitations on what uses can go where and the mitigation proposed, to make sure that as far as possible this is a positive one. However, it is recognised that there would be some adverse effects felt by people living in the local area in relation to noise and visual impact, recognising that individual perceptions may vary.
- 8.26 UDX has considered impacts on the local community through its proposed parameters and controls, including those related to height, noise, location of uses and Design Standards. This includes:
- limiting height of structures closest to residential properties;
 - reducing the scale of development towards the perimeter of the Site;
 - dense perimeter planting, retaining existing tree screens where possible;
 - location of principal access and circulation roads away from residential properties;
 - realignment of Manor Road to direct traffic away from residential properties;
 - a commitment to not typically exceed specified noise limits; and
 - a transport vision to deliver a significant proportion of trips to the Site by public transport.

- 8.27 As the detailed design of the Proposed Development has yet to be developed, some effects reported in the ES are likely to be overstated, or may not arise at all, however, they have been included to assess the cautious worst case scenario. One example of this is in relation to noise. A multitude of factors combine to influence how noise is perceived at any specific location at any particular point in time. UDX's experience from operating adjacent to a large school and multiple residential areas in Orlando, is that noise is not a significant community concern, and complaints are rare.
- 8.28 In order to help mitigate concerns regarding operational noise, specific, measurable limitations on noise are proposed and it is proposed that the hours that the gated area within the theme park is open to the public are limited to 7am to 11pm Monday to Sunday (including public holidays), other than for a limited number of special events and seasonal offerings **Design Standards (Document Reference 6.3.0)** (Design Standard #CZ9.1).
- 8.29 The OCEMP includes various measures to address impacts that may be felt by the community during construction including:
- 8.30 Limits on construction working hours, other than for certain activities which may require extended working hours for reasons of engineering practicability, weather and safety such as major concrete pours and piling, surveys, lifting/fitting of infrastructure and equipment, and abnormal deliveries.
- Appointment of a Community Liaison Officer to enable a first point of call for queries and concerns of the local community during construction.
- 8.31 The height strategy, set out within the **Design Standards (Document Reference 6.3.0)**, has also sought to address effects on the local community in the ways set out in paragraph 5.22 of this Planning Statement.
- 8.32 The Proposed Development also includes retail and leisure facilities that would be available to the local community without an entrance ticket and a potential sports complex would be available for use by the local community, with a charge.
- 8.33 UDX has also considered an alternative scenario which is presented in **Appendix 3.3 of the ES (Document Reference 4.3.3.0)** 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. The planning balance has however been undertaken on the basis that these properties remain in residential use.

Fire and tall buildings

- 8.34 As noted above, it is rare for a fire to occur at a UDX theme park. UDX is experienced in managing theme parks of the size and scale of the Proposed Development and has standard measures to prevent fires occurring. This includes regular inspections, fire drills, and close coordination with local fire departments. Based on the experience of UDX, it is expected that the increase in demands placed on the fire services during operation would be negligible.
- 8.35 UDX has also considered the implications of the fire safety gateways following the Review of Building Regulations and Fire Safety which was led by Dame Judith Hackitt⁷.
- 8.36 The Proposed Development does not contain any dwellings or educational accommodation for which a Fire Statement would be required. The Proposed Development does include the potential for temporary workforce accommodation, which cannot be entirely ruled out as comprising 'dwellings' for the purposes of the fire safety gateways. To address this point, it is proposed that a condition (Condition no. 6 (6)) be placed on any planning permission granted which would require a Fire Statement to be submitted in the event that the accommodation comprised two or more dwellings and was proposed in a building which is 18 or more metres in height or contains 7 or more storeys. Gateway two would be addressed if required at building control approval stage.

Utilities

- 8.37 The Promoter has prepared a **Utilities Statement (Document Reference 6.10.0)** which has been developed through engagement with Statutory Undertakers and independent multi-utility companies. It provides details of the current constraints to the Proposed Development due to existing services, the availability and capacity of existing public utilities to service the Proposed Development, and what reinforcement works will be required to meet predicted demand for utility services based on different development phases.
- 8.38 UDX has detailed expertise and knowledge relating to their developments around the world and have access to historic and live operational data for their similar facilities in relation to utility demands.

⁷ Dame Judith Hackitt DBE FREng (2018) Building a Safer Future, Independent Review of Building Regulations and Fire Safety: Final Report

- 8.39 SOAPs have also been signed with the main utility providers (Anglian Water, UKPN and Cadent) to demonstrate that they can meet the needs of the Proposed Development, although the final details of routing are still inchoate. These are provided at **Appendix 4** to this Planning Statement.
- 8.40 The utilities strategy is consistent with the intention to deliver a low-carbon strategy and explore future opportunities such as utilising ‘recoverable’ energy whilst maintaining needed flexibility to ensure security of supply, transitional phasing, and delivery of Site services.

Daylight and sunlight

- 8.41 The Building Research Establishment (BRE) publishes guidance on how to achieve acceptable levels of daylight and sunlight in existing residential properties when bringing forward new development. This is set out in BRE (2022) *Site layout planning for daylight and sunlight: a guide to good practice* (BR 209). It does this by setting guidance on how much light should enter main living spaces, known as the Vertical Sky Component (VSC) and how many probable sunlight hours will be achieved in habitable rooms. It is important to note that the BRE document is guidance only and it is recognised that it may be difficult to achieve the levels within it within all windows, particularly in dense urban areas.
- 8.42 As stated earlier in this Planning Statement, the siting, design, height and massing of buildings and structures throughout the ERC is not yet known, although these will be controlled by the height limitations and the open sky concept in the **Design Standards (Document Reference 6.3.0)**, to ensure articulation is achieved and the development doesn’t come forward in a single built mass. For this reason, it is difficult at this stage in the design process to carry out a realistic assessment of the impact of the Proposed Development on the daylight and sunlight of existing residential properties. Despite these challenges, based on a cautious worst-case scenario, the planning proposal does include a VSC assessment which can be found in **Daylight Results at Appendix 2.7 of the ES (Document Reference 4.2.7.0)** which has been used to inform land use limitations for when a detailed VSC assessment will be required.
- 8.43 The Daylight Results are based on the worst-case habitable room windows. Two of the three worst-case windows are in a property owned by UDX at 1 Manor Road, which UDX will no longer allow to be occupied for residential use. Furthermore, the assessment assumes a single mass of development on the basis that positions of individual buildings and structures are not yet known – this is a cautious and unrealistic scenario due to the open articulated skyline concept and height limitations. The position in practice will therefore be better than the results presented in the Daylight Results.

- 8.44 Therefore, the assessment carried out to date has informed a series of land use limitations which will be used to determine where and when a detailed VSC assessment is required as UDX brings forward development (see **Land Use Limitations Table, Document Reference 6.17.0**).
- 8.45 The land use limitations set out in the **Land Use Limitations Table** require a VSC assessment to be undertaken where development in the Core Zone exceeds certain heights within certain distances of the dwelling as specified in Daylight Report, provided that it is still being occupied, or otherwise still available, for residential use and is not owned by Universal. The assessment should demonstrate that suitable daylight and sunlight levels will be achieved in accordance with the most recent BRE guidance to the extent that suitable levels can be achieved factoring in the dwelling's baseline conditions.
- 8.46 This will ensure that suitable levels of daylight and sunlight can be achieved in existing residential properties close to the Site boundary.

Cumulative effects

- 8.47 **ES Chapter 18: Cumulative Effects (Document Reference 2.18.0)** sets out an assessment of likely significant cumulative effects that could arise from the interaction of the Proposed Development with other projects, or inter-project effects.
- 8.48 A list of Committed Developments was prepared and agreed with Bedford BC (see SoAP at **Appendix 4**).
- 8.49 No likely adverse significant cumulative effects were identified for the environmental topics within the ES, that is effects which would change the significance of the effects reported in the ES for the Proposed Development, for the reasons explained in **ES Chapter 18: Cumulative Effects**. Moderate beneficial significant cumulative effects have been identified for residents in the Labour Catchment Area (LCA) Study Area, with respect to potential employment generation for local residents and businesses.

9.0 CONCLUSION AND PLANNING BALANCE

Benefits

- 9.1 UDX has committed to delivering a Minimum Development Programme which will ensure that the benefits of the Proposed Development can be realised (see paragraphs 5.7 to 5.9 of this **Planning Statement**).
- 9.2 The Proposed Development will provide significant benefits to the Bedford area, wider region and nationally. In particular, the Proposed Development will:
- provide a significant new tourism destination of which there is no comparable in the UK, and only Disneyland Paris in Europe, that is strongly supported across all levels of national and local tourism policy;
 - provide significant jobs and socio-economic benefits to a region specifically identified for growth;
 - redevelop a significant brownfield site that was part of the former brickworks;
 - expand the Wixams Rail Station by providing a western station building and increasing the number of platforms and tracks, which will enable the opportunity to better serve the local community as well as the ERC;
 - deliver a new A421 junction with new public roads connecting across the Site, which will provide local benefits as well as connectivity into the ERC;
 - upgrade and realign Manor Road, including addressing the existing Manor Road level crossing;
 - provide active travel links which will facilitate movement across the Site and connections to other routes in the local area by foot and cycle;
 - enhance existing ecological habitat and deliver significant additional tree planting;
 - deliver high quality new public realm; and
 - provide a stimulus of inward investment to deliver transformational change across the local area, including enabling opportunities for town centre regeneration strategies to be realised in Bedford, Central Bedfordshire, Luton and Milton Keynes.
- 9.3 The UK Government's Tourism Recovery Plan (2021) and Tourism Recovery Plan: Update on Delivery (2023), prepared in response to the COVID-19 pandemic, confirm 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.”

- 9.4 Economic growth within the UK is a key focus at all levels of Government as confirmed in their Plan for Change. The Proposed Development will contribute to economic growth through the delivery of significant employment opportunities and infrastructure provision. The Proposed Development has the potential to deliver transformative benefits to the local area and region. This includes the creation of 8,065 jobs in the first year of operation, 81% of which are anticipated to be taken by local⁸ people, with a further 25,195 net additional jobs created across the UK through the supply chain in the first year of operation, growing to 42,485 jobs across the UK by the 20th year of operation. In addition, the Proposed Development would support 5,380 construction jobs at its peak, with continuing construction workforce requirements for the foreseeable future.
- 9.5 The Proposed Development has the potential to support an overall contribution of £35 billion net additional GVA (NPV) to the UK economy over a 30-year appraisal period (comprising 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.
- 9.6 In addition, 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.

Negative impacts

- 9.7 For the majority of environmental effects, the Proposed Development will generate effects that are either not significant, or are beneficial, in EIA terms. However, there are some significant adverse effects remaining after mitigation in terms of:
- landscape and visual effects during construction and operation;
 - noise during construction and operation, predominantly during the nighttime and special events scenarios;
 - traffic and transport effects relating to non-motorised users’ amenity (Wootton and Woburn Road), driver delay (Fisherwood Road), and risk of accidents and safety (Broadmead Road);

⁸ Living within Bedford Borough Council area, Central Bedfordshire, Luton and Milton Keynes

- ecology in terms of loss of woodland and reedbed habitat but only during construction, and moderate adverse effects on breeding and wintering birds, terrestrial invertebrates and commuting and foraging bats, with only impacts on bats remaining by operation stage;
- ground conditions and soils with respect to the permanent loss of approximately 43ha of BMV agricultural land;
- above-ground heritage assets, although not resulting in substantial harm; and
- the total loss of a non-designated heritage asset (a historically important hedgerow in the Core Zone) of medium significance, resulting in a residual minor adverse impact in EIA terms.

9.8 Some of these effects have been identified on a cautious worst case basis as detailed design has not yet been able to determine precise mitigation measures, or simply because of the scale of the change to a site which is currently undeveloped and highly visible in the surrounding landscape.

9.9 In terms of policy compliance, in most cases these effects are either fully compliant with policy, or compliant with the intent of policy. In the limited cases where a non-compliance is identified, clear reasons are given for this in Section 7.0.

Other Material Considerations

9.10 This Planning Statement has also set out other material considerations that apply to the consideration of the Proposed Development. The documents submitted with this planning proposal provide the information necessary to reach a view on these considerations and make sure that these important issues are addressed and relevant mitigation secured as appropriate. There are no material considerations which suggest that planning permission should be withheld and in fact demonstrate UDX's commitment to working positively with other agencies and being a good neighbour in the community for years to come.

The Planning Balance

9.11 This Planning Statement has been prepared on behalf of the Promoter to provide sufficient information to enable the Secretary of State to consult on and consider granting planning permission in relation to the construction and operation of a Universal ERC and associated development in Bedford.

9.12 The Proposed Development is significant in scale, and given the very early stage of design, assessments have been undertaken on a cautious worst case basis, which has in some cases resulted in impacts being reported as higher than they might be in practice. Nevertheless, the EIA has sought to make sure that the benefits are maximised and that the adverse effects are reduced

and mitigated as far as practicable, whilst providing sufficient flexibility to make sure that the ERC can deliver a world class experience.

- 9.13 The Site is partly brownfield and is available for development. It also has suitable characteristics for a theme park development in terms of size and being generally flat and uniform in shape, particularly in the southern portion of the Site. It is not subject to any on-site environmental or landscape designations, other than a small part of the Kempston Hardwick Pit CWS which covers the former clay pits in the northern portion of the Site, which will primarily remain an ecological area, and is not designated as Green Belt. It is therefore a very suitable location for developing this type of use in planning and environmental terms.
- 9.14 Section 2.0 sets out the need for the Proposed Development in the context of strategic non-planning related government policy. The Proposed Development delivers on the government's Plan for Change. 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 ERC in the UK is a generational opportunity to not only deliver jobs and growth but to create a new strand to the UK's bow as a tourism destination.
- 9.15 Section 7.0 considers compliance with national and local planning policy, having regard to the identified environmental effects as detailed within the **ES**. The Proposed Development fully accords with the majority of relevant national and local policies. In some limited cases, non-compliance with policy has been identified, primarily as a result of the Proposed Development not being able to avoid all impacts on biodiversity and resulting in some harm to the landscape. In addition, significant noise effects are identified, during construction and operation and there are adverse effects to above ground heritage assets, although not resulting in substantial harm. There would also be the total loss of a non-designated heritage asset (a historically important hedgerow in the Core Zone) of medium significance.
- 9.16 This Planning Statement sets out the reasons for any non-compliance with policy, which is largely as a result of the addition of a major development site into a largely open landscape, which was not contemplated when those policies were prepared.
- 9.17 The Proposed Development complies with policy on all levels with regard to enabling conditions for people and businesses to thrive and the economy to grow. It also benefits from strong support through national policy on tourism and economic development.
- 9.18 In addition to the economic benefits identified above, the Proposed Development delivers road and rail infrastructure by providing a new public road through the centre of the Site and delivering

public transport improvements, such as the expansion of the Wixams Rail Station, which would also benefit local communities.

- 9.19 As national and local planning policy was not devised to contemplate an opportunity such as that proposed, the presumption in favour of sustainable development in the NPPF has been considered, which states that where there is no relevant policy, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole. Although there are 'relevant policies' none were written to directly contemplate a development of the type proposed and there are no specific policies for consideration of theme park development, or an ERC.

Overall Conclusions

- 9.20 In terms of the presumption in favour of sustainable development in the NPPF, taking the identified adverse impacts from the **ES** into account, these adverse effects do not significantly and demonstrably outweigh the very clear benefits of the Proposed Development.
- 9.21 With particular regard to the impact on heritage assets, the predominating impacts of significance relate to the operation of the Proposed Development with moderate adverse effects identified to the setting of several heritage assets as a result of the changes in the setting and how they are understood and experienced. The assessment confirms that this does not amount to substantial harm. There will also be a total loss of a non-designated heritage asset (the hedgerow in the centre of the Core Zone) resulting in a minor adverse impact in EIA terms. Residual effects upon buried archaeology are not considered to be significant and equate to less than substantial harm. In the context of the balanced judgement required by the NPPF, the substantial benefits of the Proposed Development are considered to outweigh the loss of the hedgerow, which cannot be avoided due to its position through the centre of the Core Zone where the theme park is proposed to be located. These benefits are also considered to outweigh the less than substantial harm identified in terms of above ground designated heritage assets and buried archaeology.
- 9.22 In this case, the Proposed Development represents a generational opportunity to deliver economic growth for Bedford, the wider region and the UK as a whole, which is a significant factor in the planning balance. The role of the UK planning system is to support such growth, and make sure it is delivered in a sustainable way, whilst minimising impact as far as practicable. It is considered that the Proposed Development meets this aim.
- 9.23 In addition to the material considerations of policy, another material consideration is the very high level of public support for the Proposed Development. 92% of people, many of them local,

responded to the survey carried out between April and May 2024 saying that they supported the delivery of a Universal ERC in this location, which is almost unprecedented for major developments in the UK.

9.24 There are also very high levels of support for the Proposed Development proceeding from Bedford BC, and Central Bedfordshire, Milton Keynes and Luton Councils, in addition to significant businesses in the area such as Luton Airport.

9.25 Taken together, the planning balance is considered to lie strongly in favour of the Proposed Development.

APPENDIX 1: PLANNING POLICY COMPLIANCE TABLES

APPENDIX 1: PLANNING POLICY ACCORDANCE TABLES

A1.1 The following section provides a summary of the key national and local planning policies relevant to the Proposed Development, together with an analysis of compliance of the Proposed Development against planning policy and guidance.

A1.2 It is acknowledged there is no national policy which specifically deals with theme park development, however Government policy on all levels provides support for major economic investment in the UK and recognises the importance of the tourism sector to the UK economy. Further detail on compliance with other national and local planning policy is provided below.

National Planning Policy Framework (December 2024)

The National Planning Policy Framework (NPPF) was revised in December 2024. This version was amended in February 2025 to correct cross-referencing between a paragraph and footnotes. These amendments do not constitute a change to the policy set out in the Framework published in December 2024. The NPPF (December 2024, amended February 2025) is referred to throughout the planning proposal as either the NPPF 2024, or the NPPF. In considering NPPF planning policy compliance, consideration has also been given to Planning Policy Guidance (PPG) with respect to how NPPF policies are expected to be applied. PPG of relevance is identified in **Appendix 3.1 of the ES: Legislation Policy and Guidance (Volume 3)**.

Section	Policy	Assessment of the Proposed Development against policy objectives
2 – Achieving Sustainable Development	<p>8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</p> <ul style="list-style-type: none">a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe	<p>The Proposed Development is highly consistent with Paragraph 8 of the NPPF and will meet each of the three objectives as follows:</p> <p><u>Economic objective</u></p> <p>The Proposed Development will provide significant socio-economic benefits to the Bedford local area as well as nationally through increased employment opportunities and tourism as well as indirect economic growth through improved transport networks.</p> <p><u>Social objective</u></p> <p>The Proposed Development will deliver high quality-built development while also contributing positively to natural</p>

	<p>places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and</p> <p>c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p>	<p>landscape, in particular the Forest of Marston Vale. The Proposed Development will be guided by detailed Design Standards (document reference 6.3.0) which have been prepared as part of this application.</p> <p><u>Environmental objective</u> Provide significant additional landscape and tree planting from the current position of brownfield land and intensively farmed agricultural fields.</p> <p>Please refer to the Planning Statement (document reference 6.1.0) prepared by DWD for further details.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
6. Building a strong, competitive economy	<p>85. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.</p>	<p>The Proposed Development presents a unique opportunity for the Bedford local area and the UK more broadly and will result in significant socio-economic benefits through increased job creation and tourism.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
	<p>89. Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously</p>	<p>The Proposed Development is located just outside of the existing settlement boundary however the site is well-served by public transport and the road network and includes the productive use of brownfield land. The Site has been carefully selected and is considered to be the most appropriate site to deliver the significant benefits proposed as part of the development.</p>

	developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.	The Proposed Development is therefore compliant with this policy.
7. Ensuring the vitality of town centres	<p>90. Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:</p> <ul style="list-style-type: none"> a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters; b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre; c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones; d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary; e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites. 	<p>Appendix 2 to the Planning Statement: ‘The Retail and Leisure Impact and Compliance With The Sequential Test For Main Town Centre Uses’, considers the Proposed Developments compliance with the NPPF policy and concludes that there are no sequentially preferable sites that would accommodate the ERC, which can only be delivered as a whole, given its unique characteristics.</p> <p>The Proposed Development will create a significant increase in spending, both as a result of new visitors to the area, but also through increased local employment opportunities who would then spend their money locally. This would likely have knock on beneficial effects for the long-term viability of the existing retail and leisure landscape across the town centres in the area.</p> <p>Chapter 13 of the ES: Socio-Economics (Volume 1), considers the level of potential trade draw from existing town centres in the study area and demonstrates that even in the cautious worst case scenario, businesses in Bedford and Central Bedfordshire town centres can expect to benefit from the trade creation associated with the proposed ERC, even if there may exist some trade diversion for primary residents, as this will be more than offset by expenditure in the area from new visitors.</p> <p>On this basis, the Proposed Development complies with national policy on town centre impact and the sequential test.</p>
	91. Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing	

	centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.	
	92. When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.	
	93. This sequential approach should not be applied to applications for small scale rural offices or other small scale rural development.	
	94. When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m ² of gross floorspace). This should include assessment of: <ul style="list-style-type: none"> a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme). 	
	95. Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 94 it should be refused.	
8. Promoting healthy and safe communities	96. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: <ul style="list-style-type: none"> a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, 	The Proposed Development includes the provision of new active transport routes which will contribute to promoting healthy and safe communities. The Proposed Development will further be designed to accommodate varying levels of accessibility and mobility. High levels of security will be on Site

	<p>strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;</p> <p>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and</p> <p>c) enable and support healthy lives, reduce health through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.</p>	<p>at the Proposed Development to minimise any crime, as set out in the Security and Emergency Management Plan (document reference 6.4.1.0). The Security and Emergency Management Plan further commits to working with the Police's Designing Out Crime officers during design development. The Proposed Development includes Green Infrastructure improvements, set out in the Appendix 1 – Green Infrastructure Statement of the Design and Access Statement (document reference 6.2.0). This provides a framework for spatial moves to provide green infrastructure and layouts to encourage walking cycling, including:</p> <ul style="list-style-type: none"> • Improvements to green connections and biodiversity • Establishing an active travel network • Celebrating unique landscape features • Integrating water management systems <p>The Proposed Development is therefore compliant with this policy.</p>
	<p>97. Local planning authorities should refuse applications for hot food takeaways and fast food outlets:</p> <p>a) within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre; or</p> <p>b) in locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or anti-social-behaviour.</p>	<p>The Proposed Development is not within a walking distance of schools, nor is it considered to be in a location where there is evidence that a concentration of hot food takeaways and fast food outlets is having an adverse impact on local health, pollution or anti-social behaviour.</p> <p>Whilst the permitted uses include hot food takeaways, on a site where young people would congregate, future tenants/occupiers operating hot food and takeaway facilities would be subject to a control on their occupation (e.g., in a lease or licence) making them responsible for ensuring their operations do not give rise to pollution or anti-social-behaviour.</p>

		The Proposed Development is therefore compliant with this policy.
	<p>102. Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:</p> <p>a) anticipating and addressing possible malicious threats and other hazards (whether natural or man-made), especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security. The safety of children and other vulnerable users in proximity to open water, railways and other potential hazards should be considered in planning and assessing proposals for development.</p> <p>Locations where large numbers of people are expected to congregate includes transport hubs, night-time economy venues, cinemas and theatres, sports stadia and arenas, shopping centres, health and education establishments, places of worship, hotels and restaurants, visitor attractions and commercial centres.</p>	<p>Public safety and security will be managed by UDX. The Proposed Development is proposed to be managed through a unified control approach, whereby UDX will oversee all aspects Proposed Development, from initial planning and design and coordination of the infrastructure to construction of the ERC and master infrastructure to long-term management of the common area elements of the Proposed Development.</p> <p>The Security and Emergency Management Plan (document reference 6.4.1.0) sets out the general approach to security in relation to both natural and manmade hazards and threats, including identification of organisations with which it will coordinate its more detailed operations plans.</p> <p>With respect to the safety of children and other vulnerable users in proximity to open water, Chapter 17 of the ES: Population and Health (Volume 1) states that the water bodies at the Proposed Development will not be publicly accessible or directly accessible to visitors. Water bodies are included to protect local biodiversity and therefore visitors will not be allowed access. This matter has therefore been scoped out of Chapter 17 of the ES.</p> <p>As such, the Proposed Development is therefore compliant with this policy.</p>
	103. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on	This part of the NPPF is focused on how planning policies enable the delivery of high-quality open spaces and is therefore not directly applicable to development control decisions, however, it is relevant that the Proposed

	<p>robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.</p>	<p>Development is delivering a leisure and recreation use which will enhance access to high quality open spaces, noting that many of them will be ticketed, rather than new public open space. The Proposed Development is also delivering new active travel routes which will help connect local communities to existing open spaces.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
	<p>105. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.</p>	<p>According to the Bedford Borough Council Rights of Way Map, there are two Public Rights of Way (PROWs) (footpaths number 1 and 2) crossing the southern parcel of the Core Zone, and two linked Public Rights of Way (A1 and 8) to the north of the Lake Zone.</p> <p>The Proposed Development will result in the permanent stopping up of footpaths 1 and 2 (although this will need to be consented separately); however, the Proposed Development will also include enhanced local links by way of upgrades to existing PROWs as well as new active transport links within the area. The existing PROWs are largely historical routes which do not have connections into the wider footpath network and so overall the Proposed Development is considered to result in a benefit to the existing rights of way network.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
<p>9. Promoting sustainable transport</p>	<p>109. Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:</p> <ul style="list-style-type: none"> a) making transport considerations an important part of early engagement with local communities; 	<p>Transport considerations have been central to the Proposed Development and extensive engagement has been undertaken with the relevant stakeholders. Please refer to the Transport Assessment at Appendix 5.1 of the ES (Volume 3) prepared by Vectos for further details.</p>

	<ul style="list-style-type: none"> b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places; c) understanding and addressing the potential impacts of development on transport networks; d) realising opportunities from existing transport or proposed infrastructure, and changing transport technology and usage – for example in relation to scale, location and density of development that can be accommodated; e) identifying and pursuing opportunities to promote walking, cycling and public transport use are identified and pursued; and f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains. 	<p>The Transport Assessment has taken a Vision-led Planning approach to transport planning, comprising:</p> <ul style="list-style-type: none"> • Early engagement with local communities on the traffic and transport element of the Proposed Development; • Realistic and adequate testing of scenarios; and • Prioritising sustainable transport modes. <p>The Transport Assessment confirms that the Proposed Development will deliver two major pieces of transport infrastructure, a grade separated junction to the A421 and a larger railway station on the Midland Main Line at Wixams, can deliver the forecast transport demands to and from the Proposed Development. In addition, a potential new railway station on EWR is proposed, although this is not relied upon to deliver the proposed modal split. This is supported by the DfT, who has analysed the demands and is satisfied that the rail networks, including other stations on the lines, are capable of accommodating the demands.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
	<p>110. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.</p>	<p>The Proposed Development responds directly to this policy and the reason for choosing the Site is directly related to the fact that it is and can be made sustainable, due to its high level of accessibility at international, national, regional, and local levels.</p> <p>The Transport Assessment at Appendix 5.1 of the ES (Volume 3) has taken a Vision-led Planning approach to transport planning, comprising:</p>

		<ul style="list-style-type: none"> • Early engagement with local communities on the traffic and transport element of the Proposed Development; • Realistic and adequate testing of scenarios; and • Prioritising sustainable transport modes. <p>The vision is that for UK travel, it is reasonable to design for a 40:40:20 split of visitor movement between road, rail and 'other' modes, where 'other' modes include dedicated coach travel, local bus and taxi travel. How the Proposed Development takes this into account is set within the Transport Assessment at Appendix 5.1 of the ES (Volume 3) and the Travel Plan at Appendix 5.6 of the ES (Volume 3).</p> <p>The Transport Assessment confirms that the Proposed Development will deliver the two major pieces of transport infrastructure as detailed above which can deliver the forecast transport demands to and from the Proposed Development.</p> <p>The Travel Plan sets out a series of management measures that will govern transport activities on the Site.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
	<p>115. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:</p> <p>a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location</p>	<p>The Transport Assessment at Appendix 5.1 of the ES (Volume 3) has taken a Vision-led Planning approach to transport planning, including prioritising sustainable transport modes.</p> <p>The Vision-led Planning approach taken in support of the Proposed Development's transport strategy puts the onus on delivering the sustainable transport infrastructure necessary</p>

		<p>to achieve the Vision's desired car mode share, making public transport the main modes for accessing the Proposed Development, given the expected length of most journeys, with walking and cycling available for more local journeys. The Vision captures the significant mutually beneficial opportunities that the Proposed Development and planned rail infrastructure improvements at Wixams and the safeguarding of land for a potential EWR station on the Site bring. The Proposed Development will deliver new safe walking, cycling and road infrastructure across the Site to the benefit of local communities</p> <p>The Proposed Development includes the following sustainable transport measures.</p> <ul style="list-style-type: none"> • New pedestrian and cycle routes are provided along key desire lines within the Site; • From the Site, pedestrian and cycle links are provided to the East Gateway Zone; • From the Lake Zone, a pedestrian and cycle link is proposed to the Interchange Retail Park to tie into existing facilities; • An enhanced Wixams Station, with its new west-facing plaza which will provide last-mile connection to the Theme Park; and • Shuttle buses between Milton Keynes Rail Station and the Site for the period in which there is no EWR station on the Marston Vale Railway within proximity to the Site. <p>The Proposed Development is therefore compliant with this policy.</p>
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	<p>116. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.</p> <p>Where 'Reasonable future scenarios' (for assessing potential highways impacts) is defined as: a range of realistic transport scenarios tested in agreement with the local planning authority and other relevant bodies (including statutory consultees where appropriate), to assess potential impacts and determine the optimum transport infrastructure required to mitigate any adverse impacts, promote sustainable modes of travel and realise the vision for the site.</p>	<p>The Proposed Development includes direct access/egress from/to the A421(T) from three directions – eastbound off-slip, westbound off-slip, westbound on-slip. Eastbound traffic joins the A421(T) via Marsh Leys Roundabout. Illustrative designs and layouts of these slip roads have been developed collaboratively with National Highways, who are responsible for the A421(T), and National Highways Safety Engineering Standards Team has undertaken a review of the illustrative designs and not raised any fundamental highway safety concerns. The capacity of the illustrative slip roads, and the wider highway network, has been assessed in a microsimulation model, and where relevant individual stand-alone junction assessments. Where necessary network improvements are proposed, and the residual cumulative impact of the development is not severe.</p> <p>Transport considerations have been central to the Proposed Development and extensive engagement has been undertaken with the relevant stakeholders. Please refer to the Appendix 5.1: Transport Assessment (Volume 3) prepared by Vectos for further details.</p> <p>The Proposed Development is supported by detailed transport modelling and assessment which are detailed within Chapter 5, of the ES (Volume 1) and the Transport Assessment.</p> <p>The Transport Assessment confirms that the Proposed Development will deliver two major pieces of transport infrastructure as detailed above which can deliver the forecast transport demands to and from the Proposed Development and that there is no transport reason to resist this scheme.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
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	<p>117. Within this context, applications for development should:</p> <ul style="list-style-type: none"> a) Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use; b) Address the needs of people with disabilities and reduced mobility in relation to all modes of transport; c) Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards; d) Allow for the efficient delivery of goods, and access by service and emergency vehicles; and e) Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations. 	<p>The Transport Assessment at Appendix 5.1 of the ES (Volume 3) has taken a Vision-led Planning approach to transport planning, comprising:</p> <ul style="list-style-type: none"> • Early engagement with local communities on the traffic and transport element of the Proposed Development; • -Realistic and adequate testing of scenarios; and • Prioritising sustainable transport modes, including provision of active travel. <p>The Proposed Development includes high quality multi-modal corridors and inclusive access for all throughout the Site, which not only provides for movement within the Site, but movement across the Site, transforming the role of the Site from a current barrier to movement to a place served by routes for all.</p> <p>The Proposed Development includes electric and other charging facilities. The Design Standards (document reference 6.3.0) includes minimum and maximum proportion of EV charging spaces to be provided across the site at Table CP02.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
	<p>118. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.</p>	<p>The Transport Assessment at Appendix 5.1 of the ES (Volume 3) has taken a Vision-led Planning approach to transport planning, comprising:</p> <ul style="list-style-type: none"> • Early engagement with local communities on the traffic and transport element of the Proposed Development; • -Realistic and adequate testing of scenarios; and • Prioritising sustainable transport modes, including provision of active travel.

		<p>The vision is that for UK travel, it is reasonable to design for a 40:40:20 split of visitor movement between road, rail and 'other' modes, where 'other' modes include dedicated coach travel, local bus and taxi travel.</p> <p>The Proposed Development is supported by the Travel Plan at Appendix 5.6 of the ES (Volume 3).</p> <p>How the Proposed Development takes this into account is set within the Transport Assessment (Appendix 5.1 of the ES, Volume 3) and the Travel Plan (Appendix 5.6 of the ES, Volume 3). The Travel Plan sets out a series of management measures that will govern transport activities on the Site.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
11. Making effective use of land	124. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land	<p>The Proposed Development includes the redevelopment of partly brownfield land and is available for development. It represents a highly effective use of land in order to deliver considerable economic benefits.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
12. Achieving well-designed places	<p>131. The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.</p> <p>135. Planning policies and decisions should ensure that developments:</p>	<p>The Proposed Development seeks to deliver a world class tourism experience. The Planning Proposal is supported by Design Standards (document reference 6.3.0) which have been informed by the Environmental Impact Assessment (EIA) to seek to mitigate the potential impacts of the Proposed Development and to provide an appropriate level of control on the way in which the detailed design of the Proposed Development will come forward.</p>

	<ul style="list-style-type: none"> 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. 	<p>The Proposed Development is resulting in significant change to the local area, and by its nature will be visible, however measures have been taken where practicable to reduce landscape and visual impact, particularly on the immediate surroundings and the policy recognises that it is not its intent to discourage appropriate innovation and change.</p> <p>The Design Standards will ensure that the relevant parts of paragraph 135 are delivered in terms of providing a well-designed, beautiful place.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
14. Meeting the challenge of climate change, flooding and coastal change	<p>161. The planning system should support the UK's trajectory towards net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.</p>	<p>Chapter 14 of the ES: Greenhouse Gases (Volume 1) provides an assessment of the Proposed Development on Greenhouse Gases (GHG). A GHG assessment has been undertaken to demonstrate consideration of the full range of potential climate change impacts. The GHG assessment in Chapter 14 of the ES confirms that a whole-life carbon approach has been used to determine significant effects on climate, based on an evaluation of potentially significant sources of GHG emissions during the construction phases (embodied carbon) and ongoing GHG emissions during the operational phase,</p>

	<p>163. The need to mitigate and adapt to climate change should also be considered in preparing and assessing planning applications, taking into account the full range of potential climate change impacts.</p>	<p>including consideration of indirect GHG emissions in the operational phase (with respect to visitors using air travel). Chapter 14 of the ES identifies a series of mitigation measures to reduce GHG emissions arising from the Construction and Operational Phases of the Proposed Development. This includes the measures set out in the Carbon Management Plan (Appendix 14.1 of the ES, Volume 3). Chapter 14 of the ES confirms that where significant effects have been identified, the proposed mitigation measures will reduce these to not significant.</p> <p>Chapter 15 of the ES: Climate Resilience (Volume 1) provides an assessment of the Proposed Development on Climate Resilience. A number of embedded design mitigation measures to address climate impacts will be incorporated into the design and are detailed in Table 159 within Chapter 15 of the ES and set out within the Environmental Controls (document reference 6.16.0).</p> <p>In terms of water scarcity, the Promoter has agreed with Anglian Water that it will meet the domestic potable water requirements of the Proposed Development. Following mitigation, no residual effects were identified in terms of climate resilience.</p> <p>Chapter 12 of the ES: Water Resources (Volume 1) provides an assessment of the Proposed Development on Water Resources. The Water Framework Directive (WFD) has also been considered within Chapter 12 of the ES. The Proposed Development has been designed to comply with the</p>
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	<p>164. New development should be planned for in ways that:</p> <p>a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and</p> <p>b) help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings in plans should reflect the Government's policy for national technical standards.</p>	<p>objectives of WFD as shown in Annex 4 Water Framework Directive Assessment in Appendix 12.3 Drainage Strategy (Volume 3) and summarised in Chapter 12 of the ES. Chapter 12 of the ES confirms that based on the embedded mitigation included, there will be no deterioration to the WFD status and future objectives, and any temporary impacts will be negligible.</p> <p>A Flood Risk Assessment (FRA) and an Outline Drainage Strategy (ODS) has been undertaken and a Drainage Strategy produced and is included at Appendices 12.1 and 12.3 of the ES (Volume 3). The FRA and ODC Drainage Strategy demonstrates how foul water and surface water runoff is to be managed and that there will be no increase in on or off site flood risk as a result of the Proposed Development. The FRA details flood risk mitigation measures required to manage the identified flooding risks. The report confirms development will be allocated on a sequential basis against flood risk, with the most vulnerable land uses allocated to the areas at the lowest risk of flooding.</p> <p>The Proposed Development is therefore compliant with all three policies.</p>
14.Meeting the challenge of climate change, flooding and coastal change	<p>170. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.</p>	<p>A FRA and an ODS has been undertaken and is included at Appendices 12.1 and 12.3 of the ES (Volume 3).</p> <p>The FRA details flood risk mitigation measures required to manage the identified flooding risks. The report confirms development will be allocated on a sequential basis against flood risk, with the most vulnerable land uses allocated to the areas at the lowest risk of flooding.</p>

		The FRA and ODS conclude that in terms of flood risk and drainage, the Proposed Development is sustainable and as such is therefore compliant with this policy.
	173. A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding, by following the steps set out below.	The Sequential and Exception test has been applied in Appendix 12.1: Flood Risk Assessment (Volume 3) and the test demonstrates that the Proposed Development has been steered to areas with the lowest risk of flooding from any source. The test demonstrates the Proposed Development includes wider sustainability benefits and demonstrates that the Proposed Development will be safe for its lifetime and reduce flood risk overall.
	175. The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).	<p>Flood Risk Mitigation Measures to manage the risk of flooding including site levels, access and egress, allocating development on a sequential basis across the Flood Zones, and future risk from existing sources are contained in Section 7 of the FRA.</p> <p>Section 8 of the FRA demonstrates that the Proposed Development will not increase flood risk to third parties when compared to the baseline scenario, both for the present day and in the future when climate change is considered.</p> <p>Based on the above, the Proposed Development satisfies both the Sequential and Exception Test in relation to flood risk, and accords with paragraph 170, 173 and 175 of the NPPF.</p>
16.Conserving and enhancing the historic environment	207. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise	The Proposed Development has sought to avoid impacting heritage assets and proposes a number of mitigation methods to address any residual impacts. To mitigate the impact, the Proposed Development will include (as set out within the Environmental Controls (document reference 6.16.0)). With these mitigation measures in place, residual effects upon buried archaeology are not considered to be significant and

	where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.	equate to less than substantial harm. The Proposed Development therefore complies with paragraph 207 in relation to the provision of an appropriate desk-based assessment or, where necessary, a field evaluation.
	212. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.	<p>Chapter 10: Cultural Heritage of the ES (Volume 1) identifies that there are a number of significant residual adverse effects on the setting of heritage assets as a result of the Proposed Development, with a major adverse impact on a historic hedgerow in the centre of the Core Zone (being a non-designated heritage asset) which will be required to be removed during construction.</p> <p>The predominating impacts of significance relate to the operation of the Proposed Development with moderate adverse effects identified to the setting of several heritage assets as a result of the changes in the setting and how they are understood and experienced.</p> <p>The assessment confirms that this does not relate to substantial harm, whereby substantial harm is equivalent to a major adverse effect) and so paragraphs 213 and 214 of the NPPF are not engaged.</p> <p>The Proposed Development includes very substantial benefits in terms of the provision of a significant number of jobs during construction and operation, an influx of expenditure which would kick start the transformation of the local area and region and the delivery of strategic and local transport infrastructure. This is considered to more than outweigh the less than substantial harm identified to heritage assets and therefore the Proposed Development complies with paragraph 215.</p>
	213. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional	
	214. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use.	
	215. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should	

	be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.	The Proposed Development would result in the loss of a historically 'important' hedgerow during construction, although the hedgerow is not a designated heritage asset and so the NPPF tests on substantial harm are not engaged. A balanced judgement is therefore required on the scale of the harm or loss and the significance of the heritage asset. The removal of the hedgerow during the construction phase would result in a permanent, residual minor adverse effect ('total loss of significance' in NPPF terms). Assessed against paragraph 216, the scale of loss is total, and the significance of the heritage asset is medium. The predicted impact on buried archaeology is less than substantial harm to a non-designated heritage asset.
	216. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.	The Proposed Development is therefore compliant with these policies.
17.Facilitating the sustainable use of minerals	225. Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.	<p>The whole Site is identified as a Minerals Safeguarding Area (MSA) in the 2014 MWLP:SSP for Oxford Clay, which is covered by policies MSP11 and MSP12.</p> <p>A Minerals Resource Assessment (MRA) has been prepared and is provided at Appendix 11.3 of the ES (Volume 3), which confirms compliance with policies MSP11 and MSP12. As such, the Proposed Development also complies with paragraph 225.</p>

Bedford Borough Local Plan 2030

Policy	Assessment of the Proposed Development against policy objectives
<p>Policy 2S – Healthy communities</p> <p>The Council will support programmes and strategies which aim to reduce health inequalities and promote healthier lifestyles and will:</p> <ul style="list-style-type: none"> i. Carry out Health Impact Assessments, which may be incorporated into sustainability appraisals, on all planning policy documents. ii. Where appropriate require a Health Impact Assessment of all residential and mixed-use sites of 50 homes or more, employment sites of 5 hectares (gross) or more, retail developments over 500 square metres (Gross Internal Area), or any other sites as requested by the local planning authority. iii. Require development to be designed to promote health, safety and active living for all age groups, including healthy living options for older people, active space for children and adults and encourage physically active lifestyles through the provision of sustainable modes of transport (e.g. walking and cycling). iv. Recognise, safeguard and encourage the role of allotments; garden plots within developments; small scale agriculture and farmers markets in providing access to healthy, affordable locally produced food options. v. Work jointly with health providers to help deliver and protect a network of health facilities in locations accessible by walking, cycling and public transport where this will meet an existing deficiency, or support regeneration or new development. 	<p>The Proposed Development is supported by Chapter 17, of the ES: Population and Health (Volume 1), which doubles as a Health Impact Assessment (HIA).</p> <p>The HIA has been informed by and is in line with relevant guidance, including Determining Significance for Human Health in Environmental Impact Assessment and the Healthy Urban Planning Checklist.</p> <p>Section 5 of the Design and Access Statement (document reference 6.2.0) outlines the Design Vision and Approach for the Proposed Development and includes a series of Site-wide design principles, which include to promote liveable and healthy places.</p> <p>Public safety and security will be managed by UDX. The Proposed Development is proposed to be managed through a unified control approach, whereby UDX will oversee all aspects Proposed Development, from initial planning and design and coordination of the infrastructure to construction of the ERC and master infrastructure to long-term management of the common area elements of the Proposed Development. The Security and Emergency Management Plan (document reference 6.4.1.0) sets out the general approach to security in relation to both natural and manmade hazards and threats, including identification of organisations with which it will coordinate its more detailed operations plans.</p>

		<p>The Transport Assessment at Appendix 5.1 of the ES (Volume 3) has taken a Vision-led Planning approach to transport planning, including prioritising sustainable transport modes.</p> <p>The Proposed Development includes the following sustainable transport measures.</p> <ul style="list-style-type: none"> • New pedestrian and cycle routes are provided along key desire lines within the Site; • From the Site, pedestrian and cycle links are provided to the East Gateway Zone; • From the Lake Zone, a pedestrian and cycle link is proposed to the Interchange Retail Park to tie into existing facilities; • An enhanced Wixams Station, with its new west-facing plaza which will provide last-mile connection to the Theme Park; and • Shuttle buses between Milton Keynes Rail Station and the Site for the period in which there is no EWR station on the Marston Vale railway line within proximity to the Site. <p>The Proposed Development is therefore compliant with this policy.</p>
Policy 3S - Spatial Strategy	<p>To deliver sustainable development and growth that enhances the vitality of the borough's urban and rural communities, all new development will be required to contribute towards achieving the stated objectives and policies of this plan through:</p> <ol style="list-style-type: none"> Maintaining and enhancing Bedford town centre as the preferred location for retail, leisure, visitor economy and office development. 	<p>The Proposed Development will deliver sustainable development and growth that enhances the vitality of the Bedford area, in particular, the Proposed Development will respond positively to point iii) through the delivery of significant employment opportunities and infrastructure provision.</p>

	<ul style="list-style-type: none"> ii. Establishing vibrant new areas for urban living in Bedford's urban core on land south of the river, Greyfriars, Bedford station and Ford End Road. iii. Building on and expanding the town's employment base with a focus on strategic locations related to the primary road network in the context of increasing east-west connectivity through road and rail improvements. iv. The completion of Wixams new settlement and strategic urban and village extensions to the west of Bedford, at Wootton, Stewartby and Shortstown. v. A strategic village expansion utilising brownfield land at Stewartby. vi. Strategic residential development in key service centres in association with expanded education provision where necessary. vii. Limited development in rural service centres in line with existing and potential capacity of infrastructure and services. viii. Safeguarding the intrinsic character of the countryside and the environment and biodiversity within it (to fulfil the requirements of European directives) through the careful management of development to meet local needs whilst supporting the rural economy. ix. Delivering the majority of rural growth through neighbourhood plans. 	<p>With respect to point i) Chapter 13 of the ES: Socio-economics (Volume 3) considers the level of potential trade draw from existing town centres in the Study Area assessed. It concludes that even in the worst case scenario, businesses in Bedford and Central Bedfordshire town centres can expect to benefit from the trade creation associated with the proposed ERC, even if there may exist some trade diversion for primary residents, as this will be more than offset by expenditure in the area from new visitors.</p> <p>Points ii., iv, v. and vi are strategic priorities for delivery of housing and are not relevant to the Proposed Development.</p> <p>With respect to point viii, although the Proposed Development is introducing a major use into a countryside location, it is only partly in a countryside location and will not impact on the safeguarding of the intrinsic character of the countryside from a Bedford-wide perspective. It is also introducing a significant new wetland ecosystem as part of the development in the Lake Zone.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
Policy 7S – Development in the countryside	<p>Development outside defined Settlement Policy Areas and the built form of Small Settlements will be permitted if it is appropriate in the countryside in accordance with:</p> <ul style="list-style-type: none"> i. Policy 65 - Reuse of rural buildings in the countryside ii. Policy 66 - The replacement and extension of dwellings in the countryside. iii. Policy 67 - Affordable housing to meet local needs in the rural area. iv. Policy 68 - Accommodation for rural workers. 	<p>This is a positively worded policy which seeks to support development in certain locations. The Site is located just outside of the current Settlement Boundary and the Proposed Development does not accord with points i to vi and viii to x. It is noted that there is both community and Bedford BC support for the Proposed Development (point vii).</p>

	<p>v. Neighbourhood Development Plans which have been ‘made’ by Bedford Borough Council.</p> <p>In addition, exceptionally development proposals will be supported on sites that are well-related to a defined Settlement Policy Area, Small Settlements or the built form of other settlements where it can be demonstrated that:</p> <ul style="list-style-type: none"> vi. It responds to an identified community need; and vii. There is identifiable community support and it is made or supported by the parish council or, where there is no parish council, another properly constituted body which fully represents the local community; and viii. Its scale is appropriate to serve local needs or to support local facilities; and ix. The development contributes positively to the character of the settlement and the scheme is appropriate to the structure, form, character and size of the settlement. x. Where a community building is being provided, users of the proposed development can safely travel to and from it by sustainable modes and it is viable in the long term, ensuring its retention as a community asset. <p>All development in the countryside must:</p> <ul style="list-style-type: none"> xi. Recognise the intrinsic character and beauty of the countryside; and xii. Not give rise to other impacts that would adversely affect the use and enjoyment of the countryside by others; and xiii. Not give rise to other impacts that would have a significant adverse effect on the environment, biodiversity or designated Natura 2000 sites. 	<p>With respect to xi) the Proposed Development is introducing significant woodland planting and a new wetland ecosystem in the Lake Zone, which is currently formed of the former brickworks and clay pits, which helps contribute to the intrinsic beauty of the countryside.</p> <p>With respect to xii), it is not considered overall that the Proposed Development would adversely affect the use and enjoyment of the countryside by others, nevertheless, it will result in some residual adverse effects and is proposing a major development in a partly countryside location.</p> <p>With respect to xiii) the Proposed Development includes a comprehensive approach to ecological mitigation which has been successful at reducing effects to not significant for the majority of habitats and species. There are beneficial impacts to certain species as a result of the new wetland habitat creation. The Proposed Development would not result in any adverse effects on a SSSI (national) or Natura 2000 (international) site. However, given the scale of the Proposed Development and the nature of the existing Site, some adverse effects remain across some of the receptor groups within the Site.</p> <p>The Proposed Development does not comply with this policy on the basis that it is introducing a major new use in a location partly in the countryside and results in some significant adverse effects on the environment and biodiversity, however it is not considered that this policy was prepared to envisage development of the scale proposed.</p>
Policy 28S – Place Making	<p>Development will be expected to contribute to good place-making. This will be achieved by requiring development proposals:</p>	<p>The design of the Proposed Development would be controlled through a series of Design Principles and Standards, which provide flexibility whilst seeking to ensure</p>

	<ul style="list-style-type: none"> i. To be of a high quality in terms of design and to promote local distinctiveness, and ii. To have a positive relationship with the surrounding area, integrating well with and complementing the character of the area in which the development is located, and iii. To contribute to provision of green infrastructure, and iv. To enhance the landscape, and v. To take a proactive approach to sustaining and where appropriate enhancing the historic environment, and vi. To avoid adverse impacts on biodiversity and geodiversity assets including, but not limited to, the Natura 2000 sites outside Bedford borough listed in the Habitats Regulations Assessment (Appendix 1) and vii. To respond to the unique character and importance of the River Great Ouse and its setting, and viii. To include appropriate landscaping, and ix. To contribute to the creation of the Forest of Marston Vale (when within or close to the Forest of Marston Vale area). 	<p>that the development comes forward in a way which is conscious of its setting and the environment. Please refer to the Design Standards (document reference 6.3.0) which have been prepared as part of this Planning Proposal.</p> <p>In terms of intent of this policy, the Proposed Development is delivering a high quality new place which will include new green infrastructure, significant levels of new landscaping, including tree planting, and an Ecological Enhancement Area.</p> <p>It would integrate well into the surrounding area as far as practicable, recognising that it is a major development which is resulting in significant change to the local area.</p> <p>There would be some residual adverse effects on heritage assets, but this is largely as a result of scale of change to the landscape on a highly visible site. The Proposed Development does not however result in substantial harm to the historic environment.</p> <p>The Proposed Development would include substantial additional tree planting which would contribute towards the creation of the Forest of Marson Vale.</p> <p>The Proposed Development has applied the mitigation hierarchy in terms of effects on biodiversity assets and seeks to first avoid and then mitigate effects. However, given the scale and nature of the Proposed Development, it is not possible to avoid all adverse effects on biodiversity.</p> <p>On this basis, the Proposed Development does not comply with this policy, although overall it is considered to achieve</p>
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		the intent of the policy which is about delivering positive new places.
Policy 29 – Design quality and principles	<p>All new development should:</p> <ul style="list-style-type: none"> i. Be of the highest design quality and contribute positively to the area’s character and identity, and ii. Respect the context within which it will sit and the opportunities to enhance the character and quality of the area and local distinctiveness, and iii. Protect and where appropriate, enhance heritage assets and their settings and successfully integrate with the historic environment and character, and iv. Have particular regard to the environment and biodiversity within it and ensure there are no significant effects on Natura 2000 sites (notably Portholme (SAC), The Ouse Washes (SAC/ SPA, Ramsar), Eversden and Wimpole Woods (SAC), Upper River Nene Gravel Pits (SPA/Ramsar)) designated species or habitats, and v. Promote accessibility and permeability for all by creating safe and welcoming places that connect with each other, and vi. Promote a sense of place to include attractive streets squares and other public spaces with a defined sense of enclosure, with multifunctional green spaces and corridors, and vii. Incorporate measures to promote community safety ensuring that private and public amenity spaces are clearly defined and are designed to be inclusive, useable safe and enjoyable, and viii. Integrate functional needs such as refuse / recycling storage and collection points, car and cycle parking. <p>Proposals meeting the following criteria will be expected to be guided by a design code to be agreed with the local planning authority as part of the application process:</p> <ul style="list-style-type: none"> ix. Proposals for residential developments of 200 dwellings or more. 	<p>The Proposed Development will deliver a high quality of design which will be secured through the Design Standards (document reference 6.3.0).</p> <p>It would contribute positively to the area’s character and identity and respect its context as far as practicable, recognising that it is a major development which is resulting in significant change to the local area.</p> <p>There would be some residual adverse effects on heritage assets, but this is largely as a result of scale of change to the landscape on a highly visible site. The Proposed Development does not however result in substantial harm to the historic environment.</p> <p>The Proposed Development will not have any adverse effects on a Natura 2000 site, however there are some residual effects identified on species and habitats (see main body of the Planning Statement). These have however been avoided where possible and adverse effects reduced to a few as possible.</p> <p>The Proposed Development will promote accessibility and permeability for all, with accessibility being at the heart of the design of the ERC. Further details are provided in the Design and Access Statement (document reference 6.2.0).</p> <p>The Proposed Development will deliver attractive spaces, including new streets and public roadway corridors and active travel routes. Much of the Core Zone will only be accessible only through the ticket gates, however, the ERC</p>

	<ul style="list-style-type: none"> x. Proposals for residential developments of 50 dwellings or more in areas with a historic urban form or where the landscape interface with the built form is of importance. xi. Other large scale developments. <p>The need for a design code should be discussed with the Council pre-application.</p>	<p>will be a high quality space with rides and attractions set in a landscaped setting with wide pathways. Further detail on the design intent for each of the Zones is provided in the Design Standards.</p> <p>The Proposed Development will integrate measures to meet its function needs such as refuse/recycling and storage collection points and car and cycle parking.</p> <p>In terms of the intent of this policy, the Proposed Development will deliver a high design quality, however, there are some aspects of the policy which are not complied with on the basis that there are some residual effects remaining on habitats and species (although not on nationally or internally designated sites) which cannot be avoided or mitigated and some residual effects on designated heritage assets. The reasons for this are set out in further detail in the main body of the Planning Statement.</p>
Policy 30 – The impact of development – design impacts	<p>Development proposals should take account of the principles of good design. Planning applications should give particular attention to all of the following considerations:</p> <ul style="list-style-type: none"> i. The relationship of the development with the context in which it is placed, including overdevelopment; the contribution buildings will make to the townscape and landscape qualities of the area; and where appropriate, the extent to which local distinctiveness is reinforced or created. ii. The quality of the development in terms of scale, density, massing, height, materials and layout, including the provision of private space where appropriate. iii. The quality of the public spaces created by new buildings in terms of public safety, hard and soft landscaping, and how buildings interact with public space. 	<p>The Proposed Development will deliver good design through the Design Standards (document reference 6.3.0). Further detail is provided in the Design and Access Statement (document reference 6.2.0) submitted with the Planning Proposal.</p> <p>The Proposed Development mitigates adverse impacts as far as practicable. Further detail is provided within Sections 7 and 8 of the Planning Statement (document reference 6.1.0).</p> <p>The Proposed Development is of significant scale and will result in change to the character of the local area, nevertheless it is considered that it will improve the character and quality of the area through the many beneficial</p>

	<p>Developers will be required to implement or contribute towards measures to mitigate adverse impacts. Planning permission will not be granted where proposals fail to improve the character and quality of an area.</p>	<p>outcomes including creation of a high quality new tourism destination, provision of very substantial new jobs during construction and operation, delivery of new infrastructure to serve the development and broader area, provision of new active travel links, creation of a new Ecological Enhancement Area and enabling the delivery of an expanded railway station at Wixams and safeguarding land for a potential new railway station at EWR.</p> <p>The Proposed Development is therefore considered to comply with this policy when considered as a whole.</p>
<p>Policy 31 – The impact of development – access impacts</p>	<p>Development proposals should not have any significant adverse impact on access to the public highway. Planning applications should give particular attention to all of the following considerations:</p> <ol style="list-style-type: none"> Highway capacity, parking provision, safety or general disturbance to the area. The extent to which the development is served by, and makes provision for access by public transport, cyclists and pedestrians. The suitability of access arrangements to and within the development for all members of the community, including: pedestrians, cyclists and people with disabilities. The suitability of access arrangements to and within the development for service and emergency vehicles. <p>Developers will be required to implement or contribute towards measures to mitigate adverse impacts.</p>	<p>Transport considerations have been central to the Proposed Development and extensive engagement has been undertaken with the relevant stakeholders. Please refer to the Transport Assessment at Appendix 5.1 of the ES (Volume 3) for further details.</p> <p>The Proposed Development includes road and rail-related development including:</p> <ul style="list-style-type: none"> 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. <p>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.</p> <p>The Proposed Development would bring with it improvements to the local transport networks that would complement the strategic accessibility to the Proposed Development, and benefit local settlements and movement patterns across the Marston Vale area.</p>

		<p>The Transport Assessment confirms that proposed infrastructure improvements included with the Proposed Development deliver adequate capacity at an overall network level to accommodate the Proposed Development in the Opening Year.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
<p>Policy 32 – The impact of development – disturbance and pollution impacts</p>	<p>Development proposals should ensure that they minimise and take account of the effects of pollution and disturbance. Planning applications should give particular attention to all of the following considerations:</p> <ul style="list-style-type: none"> i. Noise, vibration, smell, harmful emissions, impact on water quality, light glare or other disturbance or pollution which is likely to be generated by the development. ii. The existing tranquillity of the area. iii. The suitability of the existing environment in relation to nuisance or pollution in the vicinity of the site. iv. Factors which might give rise to disturbance to neighbours and the surrounding community, including overlooking, crime and community safety concerns. v. Arrangements for dealing with waste (including recyclable materials) storage and collection. vi. The impact of development on locally, nationally and internationally important habitats (including Natura 2000 sites) as a result of changes in ground water and surface water. <p>Developers will be required to implement or contribute towards measures to mitigate adverse impacts.</p>	<p>An Environmental Statement has been prepared as part of the Planning Proposal which provides a detailed assessment of the anticipated impact. Whilst there are significant adverse effects predicted, the Design Standards (document reference 6.3.0) and conditions and limitations will secure the mitigation to ensure that these are reduced as far as practical.</p> <p>This policy seeks to ensure that planning applications give particular attention to all of these considerations, rather than setting strict tests of compliance.</p> <p>The Proposed Development is therefore compliant with the intent of this policy.</p>
<p>Policy 33 – The impact of development –</p>	<p>Development proposals should ensure that they do not have a harmful impact (including cumulative impact with other development) on the adequacy of existing infrastructure, for example on utilities, schools, health and community facilities.</p>	<p>The Proposed Development will not have a harmful impact on existing infrastructure.</p>

<p>infrastructure impacts</p>	<p>Developers will be required to implement or contribute towards measures to mitigate adverse impacts.</p>	<p>The Socio-Economic assessment provided in Chapter 13 of the ES (Volume 1) confirms that during construction there will be a minor adverse residual effect for local business with respect to traffic, noise and vibration effects, and a minor adverse residual effect on emergency services. It is proposed that potential disruption to the local transport network is mitigated through the proposed transport strategy (set out in further detail in the Transport Assessment at Appendix 5.1 of the ES (Volume 3)).</p> <p>During operation, local businesses will experience a minor/negligible beneficial effect. Whilst some disruption may occur for businesses through increased traffic and presence of new competitors, any effect is expected to be outweighed by benefits associated with increased footfall and business opportunities associated with the scale of the Proposed Development.</p> <p>There will be a minor/negligible adverse residual impact on emergency services during the operational phase. Mitigation measures are set out in the Security and Emergency Management Plan (document reference 6.4.2.0), which includes: providing first aid services on Site to respond to urgent injuries and illnesses for guests, team members, contractors, and vendors; collaborating with local healthcare providers and emergency responders, ensuring shared protocols, familiarisation with site risks, and conducting emergency drills to enhance incident response; liaising with emergency responders related to site response locations, protocols, operational risks, and site familiarity to facilitate efficient and effective incident response; and providing onsite emergency drills and training opportunities for responder agencies.</p>
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Policy 34 – Advertisements	<p>Where planning permission or advertisement consent is required, or consideration is being given to a Discontinuance Notice, advertisements should have a positive visual impact on a building or on its surroundings. Proposals will be considered against the following factors:</p> <ul style="list-style-type: none"> i. Impact on the amenity of the surrounding area, particularly on heritage assets and their settings. ii. Impact on public safety, particularly on the operation of highways. <p>The cumulative impact of advertisements on these factors will be a material consideration and conditions may be imposed where necessary.</p>	<p>Advertising consent is not sought as part of this Planning Proposal; however the overall approach to signage is set out in chapter 9 of the Design and Access Statement (document reference 6.2.0).</p> <p>This policy is therefore not considered further.</p>
Policy 35S – Green Infrastructure	<p>The existing green infrastructure in the borough shall be protected, enhanced and managed for the future benefit of the environment, people and the economy.</p> <p>Development shall provide a net gain in green infrastructure, while seeking to provide a high quality multi-functional green infrastructure network in accordance with the Bedford Green Infrastructure Plan.</p> <p>The Council will work with developers and other partners to deliver the three strategic green infrastructure projects: the Forest of Marston Vale, the Bedford River Valley Park and the Bedford to Milton Keynes Waterway Park.</p>	<p>The Proposed Development will support the creation of a strong and multifunctional green infrastructure network and delivery on the objectives of the Forest of Marston Vale.</p> <p>The Proposed Development provides opportunities for delivery on the objectives of the Forest of Marston Vale through enhanced tree planting.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
Policy 36S – Forest of Marston Vale	<p>Bedford Borough Council will continue to support the creation of the Forest of Marston Vale to deliver the environmentally led regeneration</p>	<p>The Proposed Development will provide significant additional landscape and tree planting from the current</p>

	<p>of the area. Development proposals within the Forest of Marston Vale area will be required to:</p> <ul style="list-style-type: none"> i. Demonstrate how they will deliver 30% tree cover across their development site. This can be achieved through a combination of new planting of trees, woodlands and hedgerows within development sites and ii. Contribute to the environmentally led regeneration of the Forest of Marston Vale, in line with the aims of the Forest Plan and iii. Demonstrate how their proposals reflect relevant design guidance (supplementary planning document) for development within the Forest of Marston Vale. 	<p>position of brownfield land and intensively farmed agricultural fields.</p> <p>It is anticipated that the Proposed Development would increase the number of trees on the Site and may be able to deliver the 30% tree cover within this policy, however, as the detailed landscape design has yet to be developed, UDX is unable to commit to that target. It is understood from UDX's meetings with the Forest of Marston Vale that they broadly support the principle of a UDX ERC on the Site, including the extensive EEA commitments within the ERC.</p> <p>The Proposed Development is therefore compliant with the intent of this policy.</p>
<p>Policy 37 – Landscape Character</p>	<p>Development proposals will protect and enhance the key landscape features and visual sensitivities of the landscape character areas identified in the Bedford Borough Landscape Character Assessment May 2014 (or as subsequently amended). Proposals will be required to:</p> <ul style="list-style-type: none"> i. Where appropriate incorporate and implement the landscape management guidelines and development guidelines laid out in the BBLCA, and ii. Protect and enhance the character and qualities of the local landscape through appropriate design and management, and iii. Make provision for the retention and enhancement of features of landscape importance, and iv. Safeguard and where possible, enhance key views and vistas, and v. Protect the landscape setting and contribute to maintaining the individual and distinct character, and separate identities of settlements by preventing coalescence, and vi. Where appropriate, provide landscape mitigation. 	<p>The Proposed Development will contribute positively to natural landscape, in particular the Forest of Marston Vale. The Proposed Development will be guided by detailed Design Standards which support the Planning Proposal.</p> <p>Given the very visible location of the Site, and the nature of the use proposed, it is not possible to entirely avoid landscape effects of the Proposed Development. However, embedded mitigation measures and the Design Standards (document reference 6.3.0) have been put in place to ensure that the adverse landscape effects are minimised as far as practicable. On this basis, the Proposed Development is not considered to be completely compliant with Policy 37 of the Bedford Local Plan, which seeks that development protects and enhances key landscape features and visual sensitivities of the landscape character areas. It is however considered that the Proposed Development complies with the NPPF,</p>

<p>Policy 38 – Landscaping in new development</p>	<p>Where appropriate, development shall provide landscaping on site or where more suitable, landscaping shall be provided off site and the proposed scheme shall meet all of the following criteria:</p> <ul style="list-style-type: none"> i. Existing landscape features shall be recorded in a detailed site survey in accordance with the principles of the relevant industry guidance and best practice. ii. Existing features of landscape or nature conservation value should be incorporated into the landscaping scheme. iii. The proposed landscaping scheme should consider the character of the site, site constraints, function, diversity of existing and proposed landscaping, soil type, ecological value and resilience based on the location of the site. iv. New tree planting as part of a proposed landscaping scheme will be selected, planted and established in accordance with current best practice guidance within the relevant British Standard and shall have regard to guidance in the Council's Trees and Development SPD. v. Provision of the planting of hedgerows, shrub planting and other soft landscaping to include specimen trees with a mature height of 15-20 metres within both hard and soft landscaped areas. vi. The proposed landscaping shall make a positive contribution to the streetscape and integrate with the built development and where applicable, adjoining developments. vii. Trees within adoptable areas shall be incorporated as part of the infrastructure planning and design stage in accordance with current best practice and shall have regard to the Council's guidance in the Trees and Development SPD ensuring sustainability and longevity. viii. The proposed landscaping should not lead to significant effects on the Natura 2000 sites of Portholme (SAC) and 	<p>which seeks development to be sympathetic to landscape setting, while not preventing or discouraging appropriate innovation or change.</p> <p>Chapter 7 of the ES: Landscape and Visual (Volume 1), and the Arboricultural Impact Assessment Report (document reference 6.11.0) that accompany the Planning Proposal demonstrate how existing landscape features have been recorded, understood and fed into the design of the Proposed Development. The proposed landscape strategy (as set out in the Environmental Controls (document reference 6.16.0) secures the delivery of habitat creation and landscaping across the Site. An understanding of the existing landscape and ecology has led the drainage design of the Proposed Development. Substantial new tree planting is proposed. Further detail is provided in Chapters 6: Ecology and Nature Conservation and 12: Water Resources of the ES (Volume 1).</p> <p>The proposed landscape does not result in significant effects to Natura 2000 sites.</p> <p>The Proposed Development is not considered to comply completely with Policy 37 but is compliant with Policy 38.</p>
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	the Ouse Washes (SAC/SPA/ Ramsar), as a result of surface run-off into the River Great Ouse.	
Policy 39 – Retention of trees	<p>In considering proposals for development all of the following criteria will apply:</p> <ul style="list-style-type: none"> i. Applicants shall consider opportunities to retain trees of high amenity and environmental value taking into consideration both their individual merit and their contribution as part of a group or broader landscape feature. Existing trees on and immediately adjacent the development site shall be recorded following guidance in the relevant British Standard. ii. Development applications shall provide details as to how the retained trees, hedges and hedge banks will be protected prior to, during and after construction. iii. No building, hard surfacing drainage or underground works will be permitted that does not accord with the principles of the relevant British Standard unless, exceptionally, the Council is satisfied that such works can be accommodated without harm to the trees concerned or there are overriding reasons for development to proceed. iv. Planning permission will be refused for development resulting in the loss or deterioration of ancient woodland and the loss of aged or veteran trees found outside ancient woodland (including from indirect impacts such as increased visitor pressure), unless the need for, and benefits of, the development in that location clearly outweigh the loss. v. The Council will protect existing trees through the making of Tree Preservation Orders where appropriate. 	<p>An Arboricultural Impact Assessment Report (document reference 6.11.0) has been prepared by WSP to identify any veteran, high quality and third-party trees which may be affected by the Proposed Development. A single veteran tree was identified within the Site, which is to be retained as part of the Proposed Development with suitable offsets secured, a full list is provided at Appendix 6.1 of the ES (Volume 3).</p> <p>The Proposed Development has sought to retain trees and hedgerows around the perimeter of the Site where possible, although it is not possible to maintain trees and hedgerows within the majority of the Site on the basis of the nature of the use proposed.</p> <p>Wootton Wood is the only ancient (or ancient re-planted) woodland present within 2km of the Site. Areas of deciduous woodland and traditional orchard, which are listed as HPI were identified within 2km of the Site. The Proposed Development is not predicted to result in effects upon Wootton Wood or the areas of traditional orchard due to their distance from Site, and as such were scoped out of the ES. A single veteran tree was identified within the Site, which is to be retained as part of the Proposed Development with suitable offsets secured. As such, the Proposed Development will not result in the loss or deterioration of ancient woodland and the loss of aged or veteran trees found outside ancient woodland.</p> <p>The Proposed Development therefore complies with this policy.</p>
Policy 40 – Hedgerows	Any hedgerows should be retained on development sites, unless there are overriding benefits that justify their removal. Where removal is deemed necessary, details addressing the criteria under the Hedgerow	Some areas of hedgerows are proposed to be removed to facilitate the Proposed Development, including approximately 4.6km of native HPI hedgerow habitats and

	<p>Regulations 1997 (as amended) shall be submitted to demonstrate the validity for removal and details of the replacement hedgerows. Replacement hedgerows shall be of an equal scale, native and species-rich and should be provided where possible, elsewhere on the development site. Where there are gaps in the existing hedgerows on the site, the development should provide for additional hedgerow planting.</p>	<p>historic hedgerow (non-designated heritage asset) in the centre of the Core Zone.</p> <p>New and replacement hedgerows will be planted on as part of the Proposed Development, as identified in Appendix A of the OLEMP at Appendix 6.5 of the ES (Volume 3).</p> <p>Hedgerows will be created to provide landscape integration and habitat linkages. New hedgerow planting will utilise native tree and shrub species of local provenance with a bias towards nut and fruit-bearing species and will aim to maximise species diversity. A diverse ground flora will also be encouraged, to be managed as part of the hedgerow feature.</p> <p>Retained hedgerows will be protected during the Construction Phase by incorporation of a suitable buffer, demarcated with robust Heras or similar fencing.</p> <p>Potential translocation of sections of hedgerows supporting more than four native woody species will be undertaken where suitable receptor locations around the boundary of the Site are agreed. These could include areas alongside the diverted watercourse to the east of the Core Zone, alongside the new road layout in the West Gateway and around the Lake Zone.</p> <p>Please refer to Chapter 6 of the ES: Ecology and Conservation (Volume 1) for further details.</p> <p>In this case it is considered that there are overriding benefits of the Proposed Development articulated in this Planning Statement to justify removal. The Proposed Development is therefore compliant with this policy.</p>
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<p>Policy 41S – Historic environment and heritage assets</p>	<ul style="list-style-type: none"> i. Where a proposal would affect a heritage asset the applicant will be required to describe: <ul style="list-style-type: none"> a. The significance of the asset including any contribution made by its setting and impacts of the proposal on this significance, and b. The justification for the proposal, how it seeks to preserve or enhance the asset/setting or where this is not possible, how it seeks to minimise the harm. ii. This description must be in the form of one or a combination of: a desk based assessment; heritage statement; heritage impact assessment; and/or archaeological field evaluation. Further information will be requested where applicants have failed to provide assessment proportionate to the significance of the assets affected and sufficient to inform the decision-making process. iii. Where a Proposed Development will lead to substantial harm to (or total loss of significance of) a designated heritage asset or non-designated heritage asset of archaeological interest of demonstrably equivalent significance to a scheduled monument, consent will be refused unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use. 	<p>The Site does not contain any nationally designated (protected) heritage assets, such as scheduled monuments or listed buildings. However, there are above ground heritage assets in the environs that are potentially impacted through changes to their setting. A detailed assessment of all of the heritage assets is provided in Chapter 10 of the ES: Cultural Heritage (Volume 1), which confirms that the harm to heritage assets is less than substantial.</p> <p>Chapter 10 of the ES also sets out effects to buried heritage assets and proposed a comprehensive approach to mitigation including a programme of trial trenching and field investigation which results in residual effects being reduced to not significant.</p> <p>In terms of above ground assets, the Proposed Development includes very substantial benefits in terms of the provision of a significant number of jobs during construction and operation, an influx of expenditure and the delivery of strategic and local transport infrastructure, and green infrastructure. This is considered to more than outweigh the less than substantial harm identified to heritage assets and therefore the Proposed Development complies with Policy 41S.</p>
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	<p>iv. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.</p> <p>v. In considering proposals affecting designated heritage assets or a non-designated heritage asset of archaeological interest of demonstrably equivalent significance to a scheduled monument, involving their alteration, extension, demolition, change of use and/or development in their setting, the Council will include in their consideration as appropriate:</p> <ul style="list-style-type: none"> a. The asset's archaeological, architectural, artistic and historic interest and any contribution to its significance from setting (including the wider historic landscape) b. scale, form, layout, density, design, quality and type of materials, and architectural detailing c. boundary treatments and means of enclosure d. implications of associated car parking, services and other environmental factors e. effect on streetscape, roofscape and skyline including important views within, into or out of heritage assets f. impact on open space which contributes positively to the character and/or appearance of heritage assets g. the positive benefits of the proposal in addressing heritage at risk. <p>vi. Where heritage assets are included on a Local List and are affected by development proposals the Council will afford weight proportionate to their heritage significance in the decision-making process to protect and conserve the significance which underpins their inclusion. Partial or total loss adversely impacting this significance will require clear and convincing justification.</p>	
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	<p>vii. The effect of proposals on the significance of non-designated heritage assets will be taken into account in determining applications for development. Applications which result in harm or loss of significance to non-designated heritage assets will only be supported if clear and convincing justification has been demonstrated. In making a decision, the Council will weigh the significance of the heritage asset affected against the scale of any harm or loss to it.</p> <p>viii. Where applications are permitted which will result in (total or partial) loss to a heritage asset's significance (including where preservation in situ of buried archaeological remains is not necessary or feasible), applicants will be required to arrange for further assessment of and recording of this significance in advance of, and where required, during development/works. This assessment and recording must be undertaken by a suitably qualified specialist in accordance with a design brief set by the Council's Historic Environment Team. The work might include:</p> <ul style="list-style-type: none"> • archaeological and/or historic building fieldwork, • post-excavation/recording assessment, analysis, interpretation, • archiving with the local depository, and presentation to the public of the results and finds in a form to be agreed with the Council. <p>As a minimum, presentation of the results should be submitted to the Bedford Borough Historic Environment Record and where appropriate, will be required at the asset itself through on-site interpretation.</p>	
Policy 42S – Protecting biodiversity and geodiversity	<p>Planning applications for development are required to assess the impact of the proposal on the biodiversity and geodiversity value of the site and its surroundings. This should be carried out by a suitably qualified professional in accordance with industry standards.</p>	<p>An Ecology and Nature Conservation Assessment is included at Chapter 6 of the ES (Volume 1). The Proposed Development includes a comprehensive approach to ecological mitigation as set out in the OLEMP at Appendix</p>

	<p>A proposal which is likely to have an adverse effect on a Site of Special Scientific Interest (SSSI) or Natura 2000 site will not be permitted unless there are exceptional reasons that outweigh the harm to the site.</p> <p>Development should be designed to prevent any adverse impact on locally important sites, species and habitats of principal importance contained within the Natural Environment and Rural Communities (NERC) Act 2006. However in these circumstances where an adverse impact is unavoidable, the application shall demonstrate how the harm will be reduced through appropriate mitigation.</p> <p>Where protected species or priority habitats of principal importance are adversely affected, the application will need to demonstrate how the proposed mitigation will reduce the adverse effects. If adequate mitigation is not possible, the application will need to demonstrate that the overriding reasons outweigh the impacts on the biodiversity and geodiversity of the borough otherwise the development will be refused.</p> <p>Developments with potential to have an adverse impact, either alone or in combination, on the integrity of a European Designated Site will be assessed in accordance with the requirements of the Habitats Regulations.</p>	<p>6.5 of the ES (Volume 3) and OHCMP at Appendix 6.4 of the ES (Volume 3). This has been successful at reducing effects to not significant for the majority of habitats and species, however, given the scale of the Proposed Development and the nature of the existing Site, some adverse effects remain across some of the receptor groups within the Site.</p> <p>The Proposed Development would not result in any adverse effects on a SSSI (national) or Natura 2000 (international) site.</p> <p>There are beneficial impacts to certain species as a result of the new <u>wetland</u> habitat creation.</p> <p>Impacts on protected species including bats, badgers, otter and water vole will be mitigated through a series of measures including avoidance, provision of suitable offsets, translocation and provision of new habitat.</p> <p>Given the nature and scale of development, there are residual impacts to foraging and commuting bats which cannot be compensated for on site. This is considered in relation to the overall planning balance in Section 9.0 of the Planning Statement (document reference 6.1.0).</p> <p>There are also adverse effects identified on breeding bird, wintering birds and terrestrial invertebrates which is proposed to be compensated for on-site through new and enhanced habitat.</p> <p>To this end it is considered that the Proposed Development is compliant with the policy requirement.</p>
Policy 46S – Use of previously developed land	<p>The Council will seek to maximise the delivery of development through the reuse of suitably located previously developed land provided that it is not of high environmental or biodiversity value.</p>	<p>The Proposed Development facilitates the development of brownfield land. The remainder of the Site includes Agricultural Land, which is identified as primarily 3b (non-Best and Most Versatile (BMV)). A small portion of the site</p>

<p>and use of undeveloped land</p>	<p>Where significant development is demonstrated to be necessary on agricultural land, poorer quality land should be used in preference to the best and most versatile agricultural land (grades 1-3a). Where the site is located on agricultural land outside of existing settlements, applicants will be required to provide evidence of the grade of agricultural land and, where that land is likely to be grade 3 or higher, undertake a detailed survey of land quality.</p>	<p>(12ha) within the Core Zone was identified as Grade 3a. The relatively modest proportion of BMV land does not represent a significantly productive agricultural unit in its own right.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
<p>Policy 47S – Pollution, disturbance and contaminated land</p>	<p>All development proposals will be required to:</p> <ul style="list-style-type: none"> i. Prevent the emission of significant levels of pollutants into the soil, air or water, and ii. Avoid noise giving rise to significant adverse impacts on health and quality of life or, where appropriate, mitigate and reduce its impact; and iii. Avoid any significant impact of artificial light on local amenity. Details of any external lighting scheme required as part of a new development should be submitted with the application, and iv. Reduce as far as practicable other potential impacts including from: vibration, dust, mud on the highway, smoke, fumes, gases, odours, litter, birds or pests, and v. Be appropriate for their location, having regard to the existing noise, air quality, ground stability or pollution environment, including the proximity of pollutants, hazardous substances and noise generating or disruptive uses, and vi. Remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land so that it is suitable for its proposed use. <p>All minerals and waste development proposals will be expected to demonstrate that an adequate buffer zone exists between the Proposed Development and neighbouring existing or proposed sensitive land uses. The Council will resist development proposals within the buffer zone that could be adversely affected by the mineral</p>	<p>The Proposed Development is supported by detailed assessments of the Air Quality and Noise and Vibration which have been prepared by WSP as part of the Environmental Statement.</p> <p>The Proposed Development does not result in the emission of significant levels of pollutants into the soil, air or water.</p> <p>The Construction Noise and Vibration Assessment at Appendix 9.2 of the ES (Volume 3), Construction and Operational Road Traffic Noise Assessment at Appendix 9.3 of the ES (Volume 3) and Operational Noise Assessment at Appendix 9.4 of the ES (Volume 3) identify significant residual noise and vibration effects during construction and operation. During the Construction Phase, the Principal Contractor will employ Best Practicable Means (BPM) to limit construction noise and vibration at nearby sensitive receptors. During operation, noise limits are proposed to seek to mitigate impacts to acceptable levels. The proposed noise limits are set out in the Environmental Controls (document reference 6.16.0) and the Design Standards (document reference 6.3.0), with further commentary provided in the Planning Statement (document reference 6.1.0).</p>

	<p>or waste operation or could prejudice the ability of the operator to work the permission.</p> <p>Developers are required to submit sufficient information to enable development proposals to be properly assessed.</p>	<p>The Planning Proposal includes Design Standards (document reference 6.3.0) on lighting which will assist in mitigating the impact of light on local amenity.</p> <p>A Construction Environmental Management Plan will be secured through the Planning Proposal which will mitigate the effects of emissions during construction, including in relation to dust, noise, vibration, fumes and odours. An Outline Construction Environmental Management Plan is provided at Appendix 2.3 of the ES (Volume 3).</p> <p>The Proposed Development is bringing back into use previously developed land, including significant reprofiling of the land previously utilised for the Kempston Hardwick Brickworks.</p> <p>The Proposed Development does not involve minerals development.</p> <p>With the proposed commitments to noise limits, it is considered that an appropriate balance is achieved between mitigating impacts to acceptable levels and allowing the ERC to operate in a way which is consistent with UDX's resorts around the globe. In this regard it is considered that the Proposed Development accords with national and local policy on mitigating and reducing potential adverse impacts resulting from noise and avoiding noise giving rise to significant adverse impacts on health and quality of life.</p> <p>The Proposed Development is considered to comply with this policy.</p>
Policy 49 – Waste	Proposals that are likely to generate significant volumes of waste through the development or operational phases will be required to	Waste management has been considered as part of the Proposed Development, during construction and operation.

	<p>include a waste audit as part of the application. This audit should demonstrate that in both construction and operational phases of a Proposed Development, waste will be minimised as far as possible and that such waste as is generated will be managed in an appropriate manner in accordance with the waste hierarchy. In particular, the waste audit should include the following information:</p> <ul style="list-style-type: none"> i. The anticipated nature and volumes of waste that the development will generate. ii. Where appropriate, the steps to be taken to ensure the maximum amount of waste arising from development on previously developed land is incorporated within the new development. iii. The steps to be taken to ensure effective segregation of wastes at source including, as appropriate, the provision of waste sorting, storage, recovery and recycling facilities. iv. Any other steps to be taken to manage the waste that cannot be incorporated within the new development or that arises once development is complete. 	<p>Associated infrastructure including waste storage, waste sorting and collection facilities will be provided on site to manage on-site waste.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
Policy 50S – Water	<p>Development must not adversely affect the quality, quantity and flow of both ground and surface water. Development should avoid designated Source Protection Zones unless it can be demonstrated that there would be no adverse effect from the proposal.</p> <p>Proposals involving non-mains drainage will only be considered acceptable where it can be demonstrated that it is not feasible to connect to an existing public sewer and that the proposal would not have a detrimental impact on ground or surface water.</p>	<p>The Proposed Development has taken a holistic approach to drainage and developed a surface water management strategy in conjunction with the Internal Drainage Board.</p> <p>Chapter 12 of the ES: Water Resources (Volume 1) demonstrates that the Proposed Development does not significantly adversely affect the quality, quantity and flow of ground and surface water. Overall, the surface water strategy is resulting in beneficial impacts to the existing disused clay pits in the Lake Zone.</p> <p>The Proposed Development is proposed to connect to the public sewerage system.</p>

		The Proposed Development is therefore compliant with this policy.
Policy 51S – Climate change strategic approach	<p>The Council will require the development and use of land and buildings to address climate change, adapting to anticipated future changes and mitigating against further change by reducing greenhouse gas emissions.</p>	<p>Climate resilience was a key consideration for the Proposed Development. The Proposed Development is supported by Chapter 15 of the ES: Climate Resilience (Volume 1) which details the anticipated impacts and proposed mitigation measures, concluding that there are no residual effects.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
Policy 52 – Water demand	<p>All new development will be expected to minimise the use of water. Unless it can be demonstrated that it would make the development unviable, new residential development will be required to achieve the higher water efficiency standard in the Building Regulations¹.</p> <p>¹. As currently set out in Approved Document G: Sanitation, hot water safety and water efficiency, 2015 edition, DCLG October 2015.</p>	<p>The Proposed Development has committed to a program to minimise water usage through collection of onsite water resources, including, rainwater run-off, lake abstraction, borehole abstraction or process water recycling. This water will be collectively treated and utilised for non-potable demands on the development, whilst this will include irrigation and wash-down uses, it is anticipated that treated reclaimed water would also be used for flushing in certain applications.</p> <p>Please refer to the Utilities Statement (document reference 6.10.0) for further details.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
Policy 53 – Development layout and accessibility	<p>All development will be required to take available opportunities to integrate the principles of sustainable design and layout into proposals. Wherever possible development should:</p> <ul style="list-style-type: none"> i. Be located and designed to provide convenient access to local services by foot, cycle and public transport, and ii. Use design, layout and orientation to maximise natural ventilation, cooling and solar gain, and 	<p>The Proposed Development helps to unlock road and rail infrastructure by providing a new public road through the centre of the Site and delivering public transport improvements which would also benefit local communities by enabling the expansion of the Wixams Railways Station. The Proposed Development expands the station further west, by providing a station building and additional platforms and tracks, which will provide the opportunity to better serve</p>

	<p>iii. Incorporate landscaping and open spaces, including suitable street tree planting.</p>	<p>the ERC as well as the local community. The Proposed Development also includes the provision of new active transport routes includes opportunities for extensive landscaping.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
Policy 54 – Energy efficiency	<p>Energy efficient buildings will be required as follows:</p> <ul style="list-style-type: none"> i. New residential development of fewer than 10 dwellings is required to achieve a 10% reduction in carbon emissions below the Building Regulation¹ requirement. ii. New residential development of 10 or more dwellings or on sites larger than 0.3 ha is required to achieve a 19% reduction in carbon emissions below the Building Regulation¹ requirement. iii. New non-residential developments larger than 500 m² floorspace are required to achieve a 10% reduction in carbon emissions below the Building Regulation¹ requirement. <p>These requirements will apply unless it can be demonstrated that they would make the development unviable. These requirements apply to new buildings and not to extensions or renovations.</p> <p>¹ Currently Approved Document L1A: Conservation of fuel and power in new dwellings, 2013 edition and Approved Document L2A: Conservation of fuel and power in new buildings other than dwellings, 2013 edition. DCLG March 2014 (as amended).</p>	<p>The Proposed Development seeks to follow the Energy Hierarchy as set out in the Energy Statement (document reference 6.9.0). It will include a low carbon energy centre on the Site which will contribute significantly to the efficient production and use of heat and energy. The Design Standards (document reference 6.3.0) include a series of measures to address sustainability and carbon reduction. Please refer to the Energy Statement and Design Standards for further details.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
Policy 55 – Renewable Energy – district heating	<p>Figure 11 shows where a district heating network is likely to be feasible in the future. Proposals for new built development in this area will be required to demonstrate how the layout of the site and design of buildings could accommodate connections to a district heating network when one is provided. Outside of the area shown on Figure 11 applications shall consider whether there are any specific opportunities arising as a result of the development to establish a viable district heating network.</p>	<p>A district heating and cooling network utilising low carbon technologies has been considered for the Proposed Development. Low carbon energy will be supplied from a more efficient centralised energy centre distributed by pre-insulated buried pipe networks to supply low temperature hot water and chilled water to the Proposed Development. A centralised energy centre can provide higher levels of resilience by taking into account diversity in thermal energy</p>

		<p>demands in heating and cooling systems which can help to reduce peak demands and consumption using heat recovery between systems. Further details are provided within the Energy Statement (document reference 6.9.0).</p> <p>The Proposed Development is therefore compliant with this policy.</p>
<p>Policy 57 – Renewable Energy General Impact</p>	<p>Proposals for development involving the provision of renewable and/or low carbon energy generation, including community energy projects, will be supported, subject to the acceptability of their wider impacts. As part of such proposals it shall be demonstrated that all of the following potential impacts (including cumulative impacts) have been fully addressed in consultation with affected local communities.</p> <p>General impacts</p> <ul style="list-style-type: none"> i. Context, visual appearance and landscape character. ii. Natural features, the natural environment, geology and biodiversity (including Natura 2000 sites). iii. Cultural features, historical and archaeological features, heritage assets and their settings. iv. Local land use, social and economic impacts. v. Surface and ground water. vi. Traffic and access. Additional impacts for wind energy schemes. vii. Amenity impacts – disturbance, noise, electromagnetic transmissions, shadow flicker, reflected light. viii. Safety. ix. Aviation and defence. x. Construction, future decommissioning and restoration. <p>Additional impacts for solar energy schemes</p> <ul style="list-style-type: none"> xi. Amenity impacts – disturbance, noise, glint and glare. xii. Best and most versatile agricultural land. xiii. Aviation. 	<p>The Proposed Development includes utility generation, storage, collection and processing facilities associated with the Entertainment Resort Complex, including electricity generation and storage apparatus, including renewable generation (including solar panels and battery storage).</p> <p>Any BESS would be designed and constructed in accordance with UK guidelines/requirements, including appropriate fire safety measures and defined exclusion zones and is controlled by Design Standard LZ2.2 (document reference 6.3.0).</p> <p>The Proposed Development is therefore compliant with this policy.</p>

	<p>xiv. Security measures.</p> <p>xv. Construction, future decommissioning and restoration.</p> <p>Additional impacts for biomass and energy from waste schemes</p> <p>xvi. Amenity impacts – disturbance, noise, vibration, dust, and odour.</p> <p>xvii. Pollution and air quality.</p> <p>Applications for renewable energy schemes should be supported by sufficient supporting information to enable the effects of the proposal to be accurately assessed. Developers should engage with local communities in order to seek to mitigate impacts, demonstrating that the wider environmental, economic or social benefits of the scheme outweigh any adverse impacts.</p>	
<p>Policy 69S – Amount and distribution of employment development</p>	<p>i. A minimum of 6,900 net additional jobs will be provided to 2030.</p> <p>ii. The main focus for jobs growth will be the urban area of Bedford and Kempston and on the employment sites that are already allocated in the development plan.</p> <p>iii. Applications for ‘B’ use class employment on sites that are not allocated will be determined in accordance with Policy 72S. Proposals for non B use employment on key employment sites will be determined in accordance with Policy 70.</p>	<p>The Proposed Development is highly consistent with Policy 69S. The Proposed Development has the potential to deliver transformative benefits to the local area and region. This includes the creation of 8,065 direct jobs during the first year of operation in 2031 as well as an anticipated 1.5 further additional jobs created through the supply chain for every job directly created.</p> <p>The Proposed Development will also support of 5,380 direct jobs at its peak construction</p> <p>The Planning Proposal is supported by an Employment and Skills Strategy Plan (document reference 6.12.0), which demonstrates how the Proposed Development will work with local institutions and businesses to support a healthy and growing economy. This document secures specific commitments which will enable the benefits of the Proposed Development to be realised by local and young people,</p>

		<p>including disadvantaged groups and the economically inactive.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
Policy 74 – Employment Skills	<p>Development over 200 dwellings or 5ha of ‘B’ class uses must be accompanied by an Employment and Skills Plan to identify and implement opportunities for the employment and up-skilling of local people, unless the applicant can demonstrate that they already have an effective skills policy that achieves the same outcome. The Employment and Skills Plan should be informed by priorities identified through liaison with the Council, local employment and skills agencies. The target outcome of the Employment and Skills Plan will be commensurate with, and assessed against the construction industry standard benchmarks of the employment / skills outcomes expected from the particular size and type of construction proposed.</p>	<p>The Proposed Development is supported by an Employment and Skills Plan (document reference 6.12.0), which sets out how the Promoter will put measures in place to improve the ability of young and local people to access the opportunities created by the Proposed Development, including commitments to internships and apprenticeships, mentorships and support for disadvantaged students, to break down barriers to opportunity.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
Policy 76 - Improvement and provision of new visitor accommodation	<p>Planning permission will be granted for new visitor-related buildings including hotels, bed and breakfast accommodation and self-catering facilities where the following criteria have been met:</p> <ul style="list-style-type: none"> i. the proposal is located within the urban area, a Key Service Centre, a Rural Service centre or a Small Settlement; or ii. where the proposal is located within the countryside, it is well related to a defined Settlement Policy Area, a Small Settlement or the built form of other settlements in accordance with the principles set out in Policy 7S. <p>In all other locations, development for new visitor facilities will only be supported in exceptional circumstances where it can be demonstrated that the proposal cannot reasonably be achieved from a location set out in i. or ii. of this policy.</p>	<p>The work undertaken as part of the socio-economic assessment within Chapter 13 of the ES: Socio-economics (Volume1) demonstrates that the Proposed Development will result in bringing significant additional spending into the assessed study area (defined within Chapter 13), both from visitors and workers during construction and operation of the Property Development.</p> <p>The Proposed Development includes hotels which are designed to accommodate guests of the ERC and reduce traffic impact by spreading out car trips and increasing dwell times.</p> <p>Some visitors to the ERC will choose to stay in hotels in nearby town centres and travel to the Site by public transport. The socio-economic assessment demonstrates that the economic activity induced by the Proposed</p>

		<p>Development across the visitor economies of the Core Study Area (CSA) and Sub Regional Context Area (SRCA) would be substantial. The socio-economic assessment finds that visitors attracted to the Proposed Development would provide a new source of expenditure for local businesses, increasing existing retail turnover by 4.4% in the CSA compared to the 2030 baseline and 2.9% in the SRCA after excluding spend on hotels. This uplift drops to 4.2% and 2.4% for the CSA and SRCA in the 2050 baseline turnover.</p> <p>The Proposed Development is, however, not compliant with parts i) and ii) of this policy, however, it is clear that a proposal of this scale would not be able to be accommodated within an existing centre, nor would this result in beneficial planning outcomes in relation to issues such as traffic impact.</p> <p>It is therefore considered that whilst the Proposed Development does not comply with the policy as worded, it was not designed to deal with the scale of development proposed.</p>
Policy 78 – Out of centre development	<p>New retail, leisure and office development is required to locate in Bedford town centre, Kempston district centre and the local centres in accordance with Policy 77S – Hierarchy of town centres. Any retail and leisure development proposed outside of these centres must be subject to an impact assessment if it exceeds the following thresholds. For leisure development the threshold is 2,500 sq m gross floorspace. For retail development:</p> <ul style="list-style-type: none"> i. If the nearest centre to the Proposed Development is Bedford town centre or Kempston district centre, the threshold is 500 sq m net floorspace. ii. If the nearest centre to the Proposed Development is a local centre, the threshold is 200 sq m net floorspace. 	<p>The Proposed Development includes retail, leisure and supporting office development (in the form of the ERC)</p> <p>The work undertaken as part of the socio-economic assessment within Chapter 13 of the ES: Socio-economics (Volume 1) and Appendix 6 of the Planning Statement (document reference 6.1.0) demonstrates that the Proposed Development will result in bringing significant additional spending into the assessed study area, both from visitors and workers during construction and operation of the Proposed Development.</p>

	<p>The assessment will relate to the impact on Bedford town centre, Kempston district centre and local centres within the catchment and demonstrate that development will not have a significant adverse impact on town centre vitality and viability or existing, committed and planned investment in the centres.</p> <p>Proposals for new retail development permitted in accordance with this policy will, where necessary, be subject to conditions to ensure that the development does not subsequently change its character unacceptably. Such conditions may limit the type of goods to be sold and prevent the development being subdivided.</p>	<p>This is considered further in Appendix 2 of the Planning Statement (document reference 6.1.0).</p> <p>For the reasons explained in the Planning Statement, and that the leisure and retail proposed could not by its nature be accommodated in town centres, it is not considered appropriate to carry out a traditional impact assessment. A retail and leisure impact assessment has, however, been carried out.</p> <p>The analysis shows however that the town centres in the SRCA have proposed plans for inward investment that make them well placed to take advantage of the opportunities created by the Proposed Development and make sure of an overall positive impact in retail and leisure provision in the SRCA.</p> <p>It is clear that a proposal of this scale would not be able to be accommodated within an existing centre and it is therefore considered that there is compliance with the intent of this policy, whose primary aim, as with Policy 76, is to protect existing centres.</p> <p>Aiding this, maximum floorspace limits are proposed for retail within the Site, as set out in the Design Standards (document reference 6.3.0).</p> <p>As such, the Proposed Development complies with national and local policy on town centre impact and the sequential test.</p>
Policy 86S – Delivering infrastructure	<p>New development will be required to provide, or contribute towards the provision of, measures to directly mitigate its impact on existing infrastructure, which will be normally secured through the use of site</p>	<p>The Proposed Development includes a series of infrastructure improvements which have been designed to ensure that the ERC can be appropriately accessed by car and</p>

	<p>specific planning obligations and/or Community Infrastructure Levy payments as permitted by regulations.</p> <p>Development proposals will need to clearly demonstrate that the infrastructure needed in accordance with the Council's standards, included in this plan and with reference to Supplementary Planning Documents, can be provided and phased to support the requirements of the Proposed Development. The Council will work with developers to seek to ensure that the most appropriate and beneficial solution is achieved.</p>	<p>public transport and to mitigate some of the impacts arising from the Proposed Development including:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>
Policy 87 – Public transport	<p>The Council will require that new developments provide the following:</p> <ol style="list-style-type: none"> Where appropriate, for new developments which are not currently connected to the public transport network, highway and public transport infrastructure suitable for including dedicated facilities will be provided from an early stage of occupation of the development, and Where there is an existing bus service with hourly or more frequent service levels, or there is potential to improve current services to such levels, then every dwelling and work place should usually be within 400 metres walking distance of a bus stop, and Deliver facilities which are capable of reflecting technological requirements (such as real time information or a similar future technology) in conjunction with the public transport and infrastructure, and Contribute to the development of off-site interchange facilities directly related to the Proposed Development. 	<p>Further details are provided in the Transport Assessment at Appendix 5.1 of the ES (Volume 3).</p> <p>The Proposed Development is therefore compliant with this policy.</p>
Policy 88 - Impact of transport on people, places and environment	<p>Planning applications shall demonstrate that the social and environmental impact of traffic from their proposals has been considered, in terms of all of the following:</p> <ol style="list-style-type: none"> The impact on the Air Quality Management Area The impact on resilience of the railway and highway networks 	<p>The Transport Assessment at Appendix 5.1 of the ES (Volume 3) demonstrates that the Promoter has sought to develop a positive transport strategy from the beginning to seek to maximise access to the Proposed Development by public transport and means other than the private car.</p>

	<ul style="list-style-type: none"> iii. The impact on air quality generally and the control of noise and pollutants iv. Developing opportunities to enhance sustainable transport facilities v. The impact of freight movements on the local highway network vi. The impact of safety, in terms of site access arrangements and general road safety. 	<p>Chapter 8 of the ES: Air Quality (Volume 1) demonstrates that there is no adverse impact on the Air Quality Management Area (AQMA).</p> <p>The proposed transport interventions will enable the delivery of an expanded railway station at Wixams a, which in addition to serving the Proposed Development will unlock growth, and encourage travel by sustainable modes, in the wider area. Land will also be safeguarded or a potential new EWR railway station.</p> <p>Freight movements have been considered and the Planning Proposal is accompanied by a Construction Traffic Management Plan (CTMP) included within Section 3.3. of the Outline Construction Environmental Management Plan (CEMP) at Appendix 2.3 of the ES (Volume 3) which seeks to mitigate the impact of traffic during construction on the local and strategic road network, as well as ensuring that construction can take place in a safe and efficient manner.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
Policy 89 – Electric vehicle infrastructure	<p>The Council will maximise the use of sustainable transport in developments, and support low carbon public and personal transport such as electric cars, bikes and buses.</p> <p>The Council will require new facilities for low emission vehicles to be integrated into new major development schemes where local centres or communal facilities are proposed.</p> <p>Rapid and fast charging points will be located throughout Bedford Borough as well as at key locations in the Bedford and Kempston urban areas, employment sites, railway stations, major retail and visitor destinations, outside schools, local centres and car parks.</p>	<p>The Proposed Development includes facilities for servicing, maintaining, valeting, and fuelling vehicles, including electric and other charging facilities.</p> <p>The Design Standards (document reference 6.3.0) include minimum and maximum proportion of EV charging spaces to be provided across the site at Table CP02.</p> <p><u>The Proposed Development also includes vehicle pick up and drop off for buses, coaches, taxis and ride shares.</u></p>

	To maximise the use of sustainable modes of transport, new residential developments should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations and, where appropriate, provide electric charging points at a rate of one per dwelling.	The Proposed Development is therefore compliant with this policy.
Policy 90S - Transport infrastructure and network improvements	<p>The Council will work with its partners, agencies and developers to deliver reduced congestion around the town centre and key strategic routes while promoting sustainable transport modes, through the consideration and the early provision of:</p> <ol style="list-style-type: none"> Re-development of Bedford Rail station and additional car parking provision Development opportunities around Ford End Road and Prebend Street Wixams railway station East-West rail scheme (Oxford/Bedford/Cambridge) Schemes identified in the Bedford Town Centre Strategy (Transporting Bedford 2020) Marsh Leys Junction improvements A6/A421 junction improvements Dualling of the Bedford Western Bypass Improvements on Highway England's strategic road network e.g. improvements to the Black Cat roundabout junction. <p>The Council will support the improvements to the St Johns Area and Ford End Road link and the safeguarded routes are shown on the Policies Map.</p>	<p>The Proposed Development includes a series of infrastructure improvements which have been designed to ensure that the ERC can be appropriately accessed by car and public transport and to mitigate some of the impacts arising from the Proposed Development including:</p> <ul style="list-style-type: none"> 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. <p>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.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
Policy 91 – Access to the countryside	<p>In considering proposals for development all of the following criteria will apply:</p> <ol style="list-style-type: none"> Safeguarding of existing public rights of way and ensuring the existing routes are incorporated into the Proposed Development or an appropriate diversion is provided. Where diversions to the existing public rights of way are proposed, it should be demonstrated that there are no 	<p>The Proposed Development will include the permanent stopping up of footpaths 1 and 2 (although this will need to be consented separately), but will also include the provision of new and enhanced local links and movement corridors.</p> <p>Such corridors are to be provided within the Proposed Development and will include facilities for active travel</p>

	<p>other alternatives and that the benefits of the development outweigh the harm resulting from the proposed diversion.</p> <ul style="list-style-type: none"> iii. Development should where possible, provide improvements to the public rights of way network including more river crossings linked to the current Borough of Bedford Rights of Way Improvement Plan. iv. All new routes should be multiuser routes and dedicated as bridleways with a minimum width of 4 metres. v. All new rights of way and gates must be designed to be in compliance with the Disability Discrimination Act or relevant act as amended. vi. Incorporate new routes to extend the existing public rights of way network which are not fragmented by roads, railways and other infrastructure. vii. Ensure that all developments are designed to enable safe crossing of roads, railways and other infrastructure from new and existing public rights of way. viii. Public rights of way should retain their existing surface or an improved surface suitable for all users of the rights of way. ix. There should be no net loss of public rights of way as a result of any particular development. <p>New permissive paths are encouraged as they can help to fill in gaps in the public rights of way network.</p>	<p>users. These will connect with routes beyond the Site, to allow easy active travel connection to Stewartby, Wootton, Marston Moretaine, Wixams and Bedford.</p> <p>The Proposed Development is therefore compliant with this policy.</p>
Policy 92 - Flood risk	<p>In considering new development water management and flood risk must be addressed by:</p> <ul style="list-style-type: none"> i. Directing development to areas at lowest risk of flooding by applying the sequential test and, where necessary, the exception test, in line with national policy. Development will not be permitted in flood zone 3b unless defined as 'water compatible' in table 2 of the Planning Practice Guidance. Development will not be permitted in flood 	<p>A Flood Risk Assessment (FRA) and an Outline Drainage Strategy (ODS) has been undertaken and is included at Appendix 12.1 and 12.3 of the ES (Volume 3).</p> <p>The FRA details flood risk mitigation measures required to manage the identified flooding risks. The report confirms development will be allocated on a sequential basis against</p>

	<p>zone 3a unless defined as 'less vulnerable' or 'water compatible' in table 2 of the Planning Practice Guidance.</p> <ul style="list-style-type: none"> ii. Considering all sources of flooding including fluvial, groundwater, surface water, reservoir overflow, infrastructure/sewer failure. Allowances for climate change must be included in the assessment of flood risk in accordance with latest national guidance. iii. Demonstrating that suitable infrastructure capacity is present or can be provided to serve the development. iv. Ensuring Proposed Development assesses and mitigates its impact on flood risk on and off site and includes measures to reduce overall flood risk. v. Where the assessment has identified that the Proposed Development is at flood risk (from any source) it must be demonstrated that the development will be safe for its lifetime through appropriate flood resilient and resistant design and include the provision of safe access and egress to an area of safe refuge. vi. Demonstrating how the cumulative impact of development on flooding to the immediate and surrounding area, and the Natura 2000 sites Portholme (SAC) and the Ouse Washes (SAC/SPA/Ramsar) downstream, has been addressed and reduced through the Proposed Development. <p>Site specific flood risk assessments will need to be submitted in support of development where:</p> <ul style="list-style-type: none"> vii. Development proposals in flood zone 1 exceed 1ha, in accordance with national policy; or viii. Development proposals are in flood zones 2, 3a or 3b; or ix. Evidence exists (e.g. in the Strategic Flood Risk Assessment or areas identified by the Lead Local Flood Authority) of areas with a high risk of flooding or known to be at risk of flooding from other sources, such as surface water. 	<p>flood risk, with the most vulnerable land uses allocated to the areas at the lowest risk of flooding.</p> <p>The FRA and ODS conclude that in terms of flood risk and drainage, the Proposed Development is sustainable and as such is compliant with this policy.</p>
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	Where an increase in built footprint is proposed in undefended flood zone 3a or flood zone 3b, a site specific flood risk assessment should demonstrate that level-for- level and volume-for-volume floodplain compensation can be provided to ensure there is no increase in flood risk elsewhere.	
Policy 93 - Sustainable drainage systems (SuDS)	<p>All development proposals must incorporate suitable surface water drainage systems appropriate to the nature of the site. Post-development run off rates should aim to achieve greenfield equivalents. The fact that a site is previously developed and has an existing high run-off rate will not constitute justification. Development proposals will need to demonstrate:</p> <ul style="list-style-type: none"> i. The discharge location has sufficient capacity to receive the post development flows. ii. The proposed surface water drainage system has been designed to prevent flooding of internal property and neighbouring for all rainfall events up to the 1% annual exceedance probability event including the appropriate allowance for climate change. iii. Sufficient treatment stages have been incorporated to adequately remove pollutants and protect the local water environment, following the principles of the latest national guidance. iv. Provisions for safe conveyance and storage of flood waters should the capacity of the proposed drainage system become exceeded. v. Adequate arrangements for the management and maintenance of the proposed drainage system for its lifetime have been provided. vi. Compliance with national guidance, and that regard has been given to Bedford Borough Council's SuDS Supplementary Planning Document, and industry best practice. 	<p>A Flood Risk Assessment (FRA) and an Outline Drainage Strategy (ODS) has been undertaken and is included at Appendix 12.1 and 12.3 of the ES (Volume 3). The FRA and ODS demonstrates how foul water and surface water runoff is to be managed and that there will be no increase in on or off site flood risk as a result of the Proposed Development.</p> <p>The ODS demonstrates that the drainage network at the Site is designed to accommodate runoff during all events up to and including the 100 year plus 40% climate change scenario, preventing potential exceedance flows off-site. Drainage exceedance routes have also been considered and allowed for as part of the development of parameters to make sure that any surface water runoff exceeding the drainage network capacity would naturally flow away.</p> <p>The FRA and ODS conclude that in terms of flood risk and drainage, the Proposed Development is sustainable and as such is compliant with Policy 93.</p>

	<p>vii. Opportunities to improve water quality, amenity and biodiversity benefits have been realised.</p> <p>Priority should be given to the following order of discharge locations:</p> <p>To ground via infiltration techniques;</p> <p>To an above ground water body;</p> <p>To a surface water sewer.</p>	
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Allocations and Designations Local Plan July 2013 (saved policies 15 January 2020)

Policy		Assessment of the Proposed Development against policy objectives
<p>Policy AD24 Green Infrastructure Opportunities Zones (Zone 4 Bedford to Milton Keynes – Marston Vale)</p>	<p>The green infrastructure network is divided into six opportunity zones as shown on the Policies Map.</p> <p>The opportunity zones reflect those areas in the borough where there is the greatest potential to maintain and enhance the multi-functional nature of green infrastructure across the five themes of landscape, historic environment, biodiversity, accessible green space and access routes.</p> <p>Where appropriate, development will deliver or contribute to the protection, enhancement and/or creation of green infrastructure in accordance with the priorities set out for each opportunity zone.</p> <p>Zone 4 Bedford to Milton Keynes – Marston Vale</p> <ul style="list-style-type: none"> The Forest of Marston Vale is a key green infrastructure project for the area. It is a community forest project with the aim of increasing woodland cover of the Vale to 30%. At a local scale, this will involve linking and extending existing woodland sites. Extending the 'Green Gateway' concept will increase woodland cover and provide green space for new and existing communities and buffer new development. 	<p>Landscaping and greening play an important part in how UDX designs and creates its Entertainment Resort Complexes. UDX plants thousands of trees and create green, natural perimeters around its sites to both enhance biodiversity and shield local communities. UDX has engaged with the Forest of Marston Vale on how the Proposed Development might contribute to their policy goals, including environmentally-led regeneration of the Forest of Marston Vale and increasing tree coverage across the Site.</p> <p>The Proposed Development includes significant landscaping and ecological measures which will help to achieve the objectives of Policy AD24. These measures include:</p> <ul style="list-style-type: none"> Woodland and tree habitats will be created across the Site as indicated on Figure 1: Indicative Habitat Creation and Enhancement Plan within Appendix 6.4 of the ES (Volume 3) and as per Section 3.4 of Appendix 6.4 of the ES, Outline Habitat Creation and Enhancement Plan (Volume 3). Approximately 14ha of woodland habitats will be created or enhanced, as

	<ul style="list-style-type: none"> • Creating the Bedford to Milton Keynes Waterway. This is another strategic green infrastructure project. This will complete a missing link in the waterway network by linking the Grand Union Canal to the River Great Ouse. The route runs through the Marston Vale, and the section between Stewartby and the junction with the River Great Ouse at Kempston is part of this network area. The opportunity involves creating the waterway, and also a green corridor that includes access routes and links to adjacent green spaces. • Using the Elstow Brook to link the wetlands in the brick pit area of the Marston Vale and those in the Ouse Valley at Willington, and using the Elstow Brook area as a green corridor for flood alleviation, recreation and biodiversity, and conserving and enhancing the pastoral waterside landscape. • Improving access routes, including the south west section of the Bedford Green Wheel, Sustrans Route 51, Clay Way and Bunyan Trail. • Buffering and extending ancient woodlands on the edge of the clay vale. • Mitigating the negative impacts of the highway network to improve tranquillity, reduce visual impact, create green corridors for biodiversity and enhance local distinctiveness, particularly though creating a green corridor south of the bypass, incorporating the borrow pit lakes, and linking Kempston to the Wixams. • Improving the landscape and access around brickpit and borrow pit lakes. • Creating new ponds and associated habitats. • Reinstating hedgerows and hedgerow trees. <p>Securing links between Berry Farm Wood and Wootton (including new development areas).</p>	<p>set out in Table 2.1 of Appendix 6.4 of the ES, Outline Habitat Creation and Enhancement Plan (Volume 3).</p> <ul style="list-style-type: none"> - Hedgerows will be created and enhanced to provide landscape integration and habitat linkages. New hedgerow planting is set out in Appendix 6.4 of the ES, Outline Habitat Creation and Enhancement Plan (Volume 3). - Measures to enhance the riparian zone of the Elstow Brook are proposed, including grassland and scrub planting within the 10m buffer zone (where drainage management access allows), particularly in the Lake Zone where this is currently arable habitat and is set out in is set out in Section 2.5.0 of Appendix 6.4 of the ES, Outline Habitat Creation and Enhancement Plan (Volume 3). <p>The Proposed Development is therefore compliant with this policy.</p>
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APPENDIX 2: RETAIL AND LEISURE IMPACT AND COMPLIANCE WITH THE SEQUENTIAL TEST FOR MAIN TOWN CENTRE USES

Overview

- A2.1 Paragraph 90 of the NPPF explains that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management, and adaptation. Further paragraph 94 requires an impact assessment for retail and leisure proposals outside of town centres, which are not in accordance with an up-to-date plan including consideration of a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).
- A2.2 The Proposed Development would provide a tourist attraction unlike any that currently exists in the UK. The Socio-Economic assessment provided at **ES Chapter 13 (Document Reference 2.13.0)** and **Appendix 6** to this Planning Statement – Socio Economic Benefits considers the potential for the ERC to draw trade away from other theme parks in the UK, recognising that the UK does not currently have a global calibre entertainment resort. It confirms that:

‘The Proposed Development is very different to a typical amusement park and is unlike anything that currently exists in the UK. The Proposed Development will deliver a world-class theme park that would be competitive on a global scale.’ (Appendix 6 to this Planning Statement)

‘There is (i) significant growth in and demand for theme parks globally as well as tourism and entertainment in the UK specifically, and (ii) likely to be very little trade diversion from existing theme parks. The Theme Park is therefore expected to result in overall market growth and ultimately help to grow the UK’s share of the global theme park market, benefitting all theme park operators.’ (ES Chapter 13)

- A2.3 At a UK level, the socio-economic assessment concludes that the trade created through the Theme Park is expected to be largely additional at the national level for several key reasons.
- The baseline found that the theme park sector is a growing sector: This provides evidence that the new provision will not have a material impact on economic activity elsewhere in the sector and displacement is likely to be fairly low.
 - The UK’s theme park offering has not fundamentally changed for a long time: as shown in the baseline, Legoland is the most visited theme park in the UK. It was also the most recent

addition, and it opened in 1996. Merlin has continued to invest in and improve its theme parks over the years, adding new attractions and hotels to its existing parks but no new parks have been built. Despite significant investment planned to re-energise many existing entertainment facilities across the country, there is no other major global theme park planned and there has not been a new major theme park for decades, despite the significant growth in the leisure and theme park sector.

- Consumer confidence and leisure spending has been rising. The leisure travel industry performed well in 2023 as consumers prioritise travel and the experiential over other leisure goods.
- The resident population of, and tourism arrivals to, the UK are both growing, which are the primary markets for theme park attendance.
- A look at comparable launches shows that new, large-scale parks expand, rather than cannibalise, the visitor pool. When LEGOLAND Windsor opened, its first full season drew 1.47 million guests, yet Alton Towers remained stable at approximately 2.89 million and Thorpe Park held around 0.94 million; together, the three parks were hosting over one million more visits than in 1995, proving net market growth rather than substitution.

A2.4 The Proposed Development will generate many visitors and workers who will spend time and money in the local area. This is quantified further in the analysis below. As town centres continue to recover from the impact of the Covid-19 pandemic, this is likely to result in a positive impact to those centres that have a positive strategy to make the most of this new inward investment.

Retail and leisure provision in the Proposed Development

A2.5 UDX is proposing a major new Entertainment Resort Complex (ERC) of which there is currently no comparable in the UK.

A2.6 The ERC will deliver a world class tourism destination building on UDX's industry-leading experience in building, owning and operating ERCs. The ERC will be an international destination, emulating the experiences that UDX already delivers to millions of people every year in its existing resorts across the globe. Delivering such a place is about more than just a theme park and to be successful and fully capitalise on the benefits to the collective performance of the UK's economy as a whole (commonly referred to as 'UK Plc'), it is important that the ERC delivers the range of complementary uses that are seen in international ERCs across the globe. This includes visitor accommodation, retail, leisure and restaurant facilities and conference facilities which together provide customers

with the full range of entertainment facilities and places to stay that will help to make this project a success. 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.

A2.7 Central to UDX's operating model is the concept of Unified Control, which is explained earlier in this Planning Statement. Unified Control ensures that any town centre provision is complementary to the theme park(s), amusement park(s) and/or water park(s) within the ERC. On this basis, a traditional impact assessment would not be appropriate, however, the relative health of the town centres in the Sub-Regional Catchment Area (SRCA) and their investment strategies have been considered to seek to understand the impact that the Proposed Development may have in terms of stimulating inward investment.

Impact on Retail and Leisure Market

A2.8 Volterra has estimated the potential market catchment for the Proposed Development and their analysis shows that the vast majority of visitors to the ERC, who will be using the retail and leisure provision, will be new to the area and therefore bringing spending that would not otherwise be available to the town centres in the SRCA.

A2.9 The socio-economic assessment reports its findings in terms of the Regional Context Area (RCA), Sub-Regional Context Area (SRCA), Core Study Area (CSA) and local area, as illustrated below.

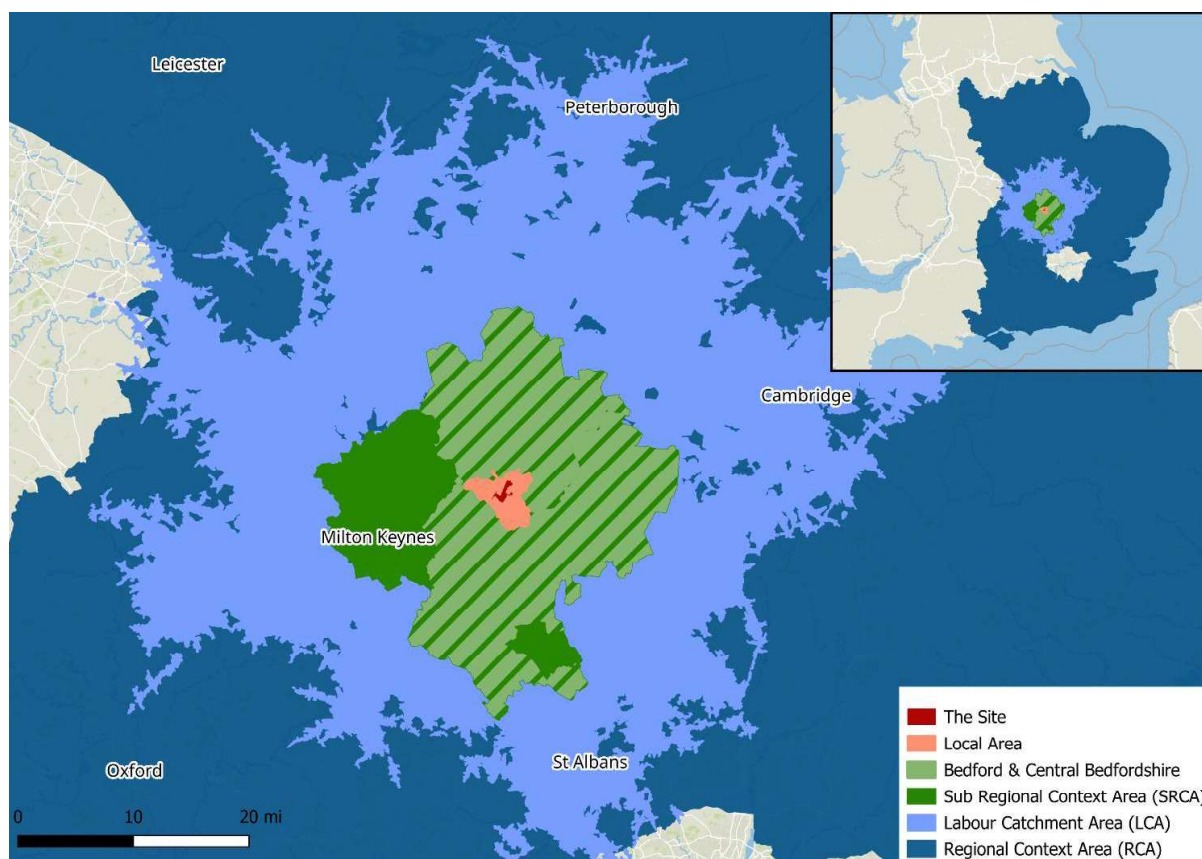


Figure A2.1 - Socio-economic study areas

A2.10 The socio-economic assessment also considers the effect of new visitors on the retail and leisure market, through visitors travelling to the area and using other retail and leisure facilities in the SRCA, and the opportunities that this creates for the sector.

A2.11 It is expected that the Proposed Development would attract 8.5m annual visitors in its opening year (2031), rising to 12m by its year of maturity (2051).

A2.12 As well as spending time and money at the Proposed Development, visitors will also spend time and money elsewhere during their trip. For the purposes of estimating visitor expenditure, visitors are disaggregated into day trippers and overnight visitors, across the previously described visitor catchment types (primary residents, secondary residents, domestic tourists and international tourists). The largest contributor (30% in 2031 rising to 48% by 2051) to expenditure is international tourists. The socio-economic analysis shows that there would be expected to be the following net induced impacts supported by visitor expenditure across the CSA and SRCA, as a result of the Proposed Development.

Table A2.1 – Net visitor expenditure by study area

Study area	2031	2051
CSA	£255m	£350m
SRCA	£430m	£635m
LCA	£560m	£865m
National	£1.3bn	£2.3bn

Table A2.2 – Net visitor expenditure, excluding spending on visitor accommodation, by study area

Study area	2031	2051
CSA	£175m	£265m
SRCA	£305m	£485m
LCA	£400m	£665m
National	£930m	£1.8bn

A2.13 The socio-economic assessment finds that visitors attracted to the Proposed Development would provide a new source of expenditure for local businesses, increasing existing visitor expenditure by 4.4% in the CSA compared to the 2031 baseline and 2.9% in the SRCA after excluding spend on visitor accommodation. This uplift drops to 4.2% and 2.4% for the CSA and SRCA from the 2051 future baseline position.

A2.14 This would likely have knock on beneficial effects for the long-term viability of the existing retail and leisure landscape across the CSA and the SRCA.

Potential Trade Draw from town centres in the CSA

A2.15 Notwithstanding the above analysis, Volterra has also estimated the potential trade draw from town centres in the CSA, assuming a cautious worst case scenario, which is reported in **ES Chapter 13: Socio-economics (Volume 1)**.

A2.16 Primary residents (residents within a one-hour commute of the Theme Park) are expected to spend £71m on-Site in the opening year. As a cautious worst-case scenario, if it was assumed that all of this spend may otherwise have gone to locations in Bedford and Central Bedfordshire town centres, and future baseline spending in these town centres was otherwise unchanged, this would equate to a reduction of 1.8% in town centre spending. This assumption is unrealistic and very conservative, given that the one-hour catchment for primary residents extends beyond these local authorities. Furthermore, total expected spend in Bedford and Central Bedfordshire (from all types of visitors) is expected to reach £175m in the opening year, just over twice as much as the spending by primary residents on-Site. The numbers are very similar in magnitude in 2051, but set against a

larger future baseline of expenditure in the CSA and so the relative impact would be lower. This shows that even in the cautious worst case scenario, businesses in Bedford and Central Bedfordshire town centres can expect to benefit from the trade creation associated with the proposed Theme Park, even if there may exist some trade diversion for primary residents, as this will be more than offset by expenditure in the area from new visitors.

Potential for Linked-trips

A2.17 People visiting the new ERC would be able to travel between the Site, Bedford and the wider area through a variety of means.

A2.18 The **Transport Assessment (Appendix 5.1 of the ES, Document Reference 4.5.1.0)** considers those areas which will be within walking and cycling distance of the Site. It states that “parts of Bedford and the villages of Stewartby, Wixams and Wootton are all within a reasonable able bodied walking distance of the Site. There is a network of traffic free cycle routes through the Marston Vale Millennium Park, south of Stewartby, which provides a connection to the National Cycle Route (NCR) 51 at Marston Moretaine. The NCR 51 also runs through Wootton, about 2km as the crow flies from the western boundary of the Site. There are a number of settlements and residential areas within a reasonable cycling distance of the Proposed Development, including Wootton, Marston Moretaine, Stewartby, Houghton Conquest, Wixams. Ampthill and Bedford’. Figure 3-1 of the Transport Assessment (replicated below) shows accessibility of the Site by walking and cycling.

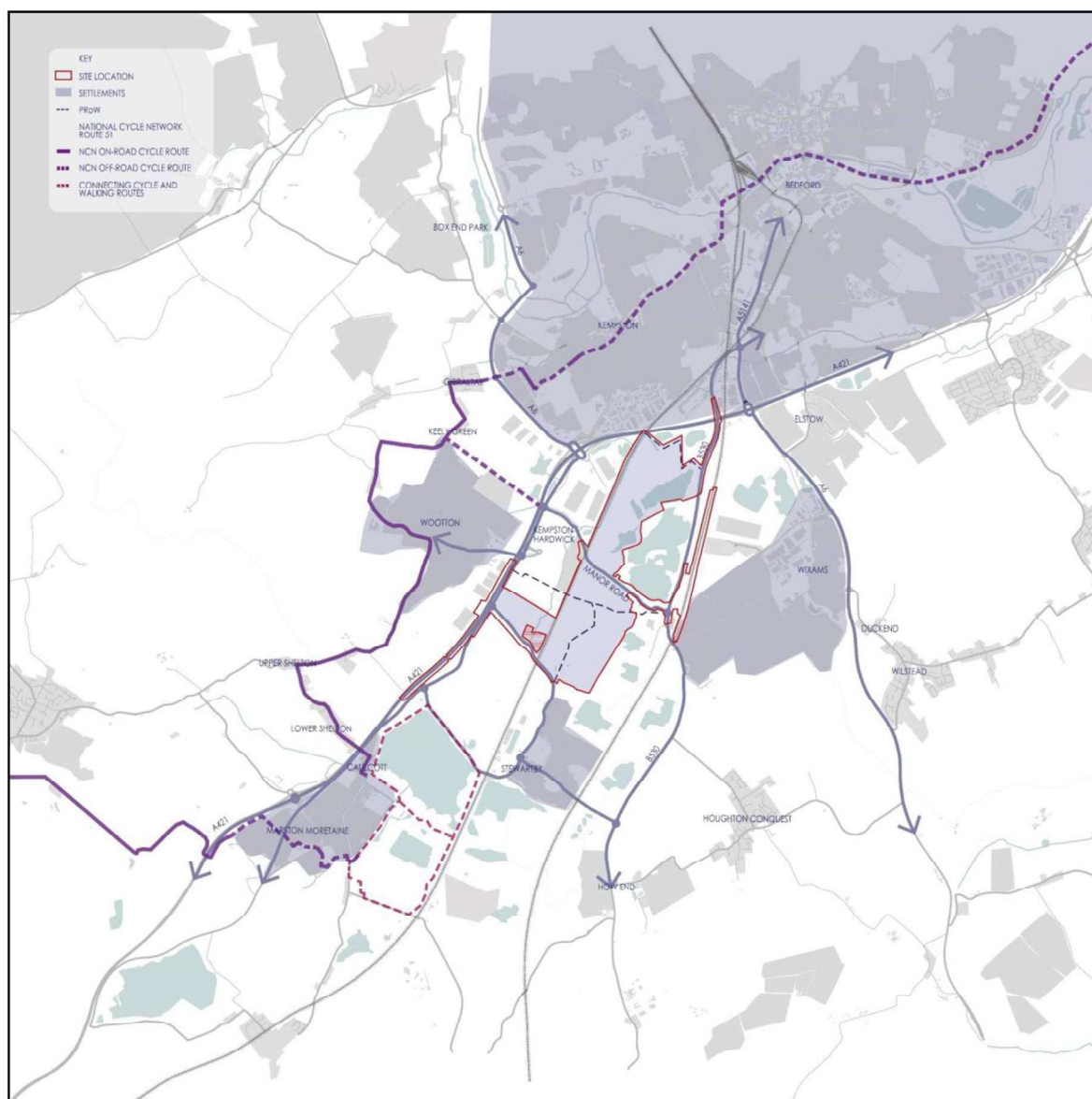


Figure A2.2 – Accessibility by Walking and Cycling – Summary (replicated from Transport Assessment)

A2.19 People visiting the ERC would therefore be able to access other retail and leisure destinations by walking and bike which offers a realistic alternative to the private car.

A2.20 People could also carry out linked trips by existing and proposed public transport links, with the Midland Main Line service, via the expanded station at Wixams, and the potential new EWR service, providing realistic opportunities to travel between the Site and town centres at Bedford and Milton Keynes.

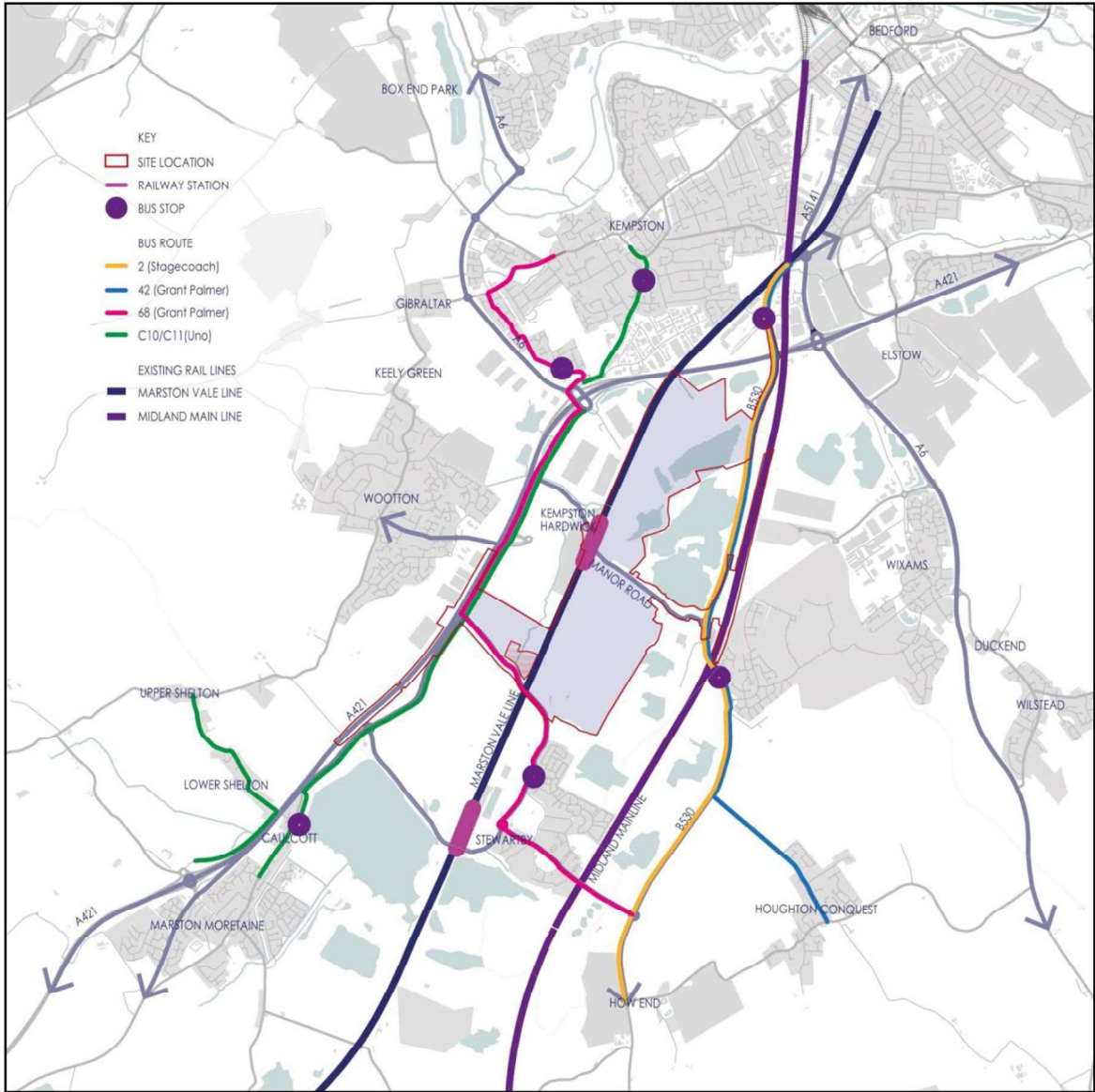


Figure A2.3 – Public transport connections (replicated from Transport Assessment)

Town Centres in Study Area

A2.21 There are the following town and regional centres within the SRCA.

Table A2.3 – Town centres in the SRCA

Local Authority area	Regional and Town centres
Bedford	Bedford Town Centre
Central Bedfordshire	Dunstable Town Centre
Luton	Luton Town Centre
Milton Keynes	Centre: MK Regional Shopping Centre

A2.22 Central Bedfordshire also has the town centres of Leighton Buzzard, Houghton Regis, Biggleswade and Flitwick. The Central Bedfordshire Local Plan (2021) states that Dunstable town centre is the preferred location for new retail development and other forms of development, such as leisure and entertainment, offices, arts, culture and tourism and should be in accordance with the Strategic Delivery Framework and emerging Regeneration and Masterplans. The discussion below therefore focuses on Dunstable town centre. District and local centres within the SRCA have not been considered further as they typically provide for day-to-day shopping. Likewise, Wolverton and Bletchley in Milton Keynes have not been considered further as they form a district centre function, with the predominant shopping destination being Centre:MK.

Town centre trends

A2.23 The Experian Retail Planner Briefing Note 21 (February 2024) provides information on trends in shopping patterns.

A2.24 Experian's latest forecasts reflect the expected effects of Brexit and the Covid-19 pandemic and show that the UK economy fell into a mild technical recession in the second half of 2023. In Q4 2023, there was a 0.6% contraction in wholesale and retail trade, which saw volumes decline by 3.3% in December – the largest monthly fall since January 2021. However, more recent retail sales data showed a rebound in sales and some optimism for the output levels in 2024. Retail sales volumes rose by 3.4% in January 2024 following December's record fall, marking the largest monthly rise since April 2021 and a recovery relative to the November 2023 volume.

A2.25 Experian are forecasting a recovery in retail sales in 2025, particularly in the comparison category and prospects have been upgraded compared to their previous forecast, in particular due to expansion plans of discount retailers.

A2.26 For comparison goods expenditure, higher levels of growth are expected under Experian's Central Case in the future (between 2.7% in 2025 to 3.1% per annum in 2026-2030). This follows a 1.2% contraction anticipated for 2024.

A2.27 In the short term, retail spending faltered in 2022 and 2023, with cost-of-living pressures leading to an end in the bounce back of demand for retail after the pandemic in 2021. 2024 was also a challenging year for retailers, as interest rates remain high, at 5.25% at the start of the year. Furthermore, the tax burden on households is elevated as a result of thresholds being frozen by the government amid a high inflation environment.

A2.28 In the longer term, sales are expected to return to a stronger footing with the removal of Brexit and Covid-19 related uncertainty and a strengthening economic backdrop. However, the weakened financial positions of households, businesses and government will be a constraint. Scarring from the recent bout of high inflation and associated downturn in demand which lingered into 2024 leaves the level of sales in real terms below where they were in Experian's Retail Planner 20 looking in the years to 2040.

A2.29 Bearing these trends in mind, nationally there has been a spike in town centre vacancies with some businesses failing to re-open following the Covid lockdowns, particularly non-food retail operators, restaurants and leisure uses. High levels of inflation and the cost-of-living crisis have also exacerbated difficult trading conditions.

A2.30 In the context of the Proposed Development, all of the above means that Local Planning Authorities will need to work increasingly hard to develop strategies to inject investment and growth into their town centres.

A2.31 The published retail and leisure studies carried out by the local planning authorities in the SRCA generally pre-date the Covid-19 pandemic and so should be viewed in the context of these overall trends.

Published data on retail centres in SRCA

A2.32 Venuescore provides a ranking of shopping centres in the UK based on the provision of multiple retailers and anchor store strength. The index provides a useful starting point in understanding the relative ranking of the main town centres in the SRCA. The Luton Retail Study Update 2015 provides Venuescore rankings for the centres in the SRCA from 2006-2014. 2017 data is obtained from the Milton Keynes Retail and Leisure Study 2018.

Table A2.4 – Venuescore data for Town Centres in SRCA

Centre	Venuescore 2014	Rank 2017	Rank 2014	Rank 2011	Rank 2006
Milton Keynes	301	34	34	39	34
Bedford	186	108	105	117	110
Dunstable	68	n/a	422	264	n/a
Luton	208	90	79	110	113

Source: Venuescore 2006, 2011, 2014 and 2017

A2.33 This shows that Milton Keynes is the highest-ranking centre in the SRCA. Centre:MK has the strength, diversity, and attractiveness of retail offer that it remains one of the key shopping

destinations for the region and is in the top 35 ranked centres in the UK. Luton is the next strongest centre in the region, which has risen up the ranks since 2006, although dropped slightly in 2017, and suggests that many shoppers should look to it as a viable shopping destination. Bedford has also increased its rank since 2006, although with a slight drop in 2017, however, Dunstable's fell dramatically between 2011 and 2014.

Investment Proposals

A2.34 Given that the nature of the retail and leisure uses proposed is such that it will provide a very different function from the existing retail and leisure provision, the investment proposals for each of the main town centres in the study area have been considered. The influx of investment into the Proposed Development has the potential to inject additional spending to help deliver these investment proposal objectives.

A2.35 The Bedford Local Plan 2030 (2020) summarises the vision for Bedford Town Centre as follows:

"recreating the traditional heart of the town and maximising its townscape and heritage quality, making it a multi-functional destination for people of all ages at all times." How we can get there is guided by the following objective: "Create a distinctive, attractive and multi-functional town centre for the future with a particularly strong focus on leisure and visitor economy activities."

A2.36 Achieving the vision and objective involves action across the Council and a wide variety of other stakeholders beyond the scope of this Local Plan. Other initiatives that affect the town centre include:

- Public Realm Framework improvements – sets out Bedford BC's long-term proposals for town centre public realm improvements, including making the High St, St Paul's Square and Midland Road more pedestrian friendly.
- The One Public Estate (OPE) Transforming Bedfordshire programme – the programme aims to encourage owners of public sector assets to work together to make better use of their combined assets. The aim of this is to create economic growth; establish more integrated and customer-focussed services; generate capital receipts; and reduce running costs; identifying areas in and around Bedford town centre that might be suitable for redevelopment.
- Harpur Shopping Centre Investment – a project to increase the retail footprint and re-configuration of existing unit sizes and layouts to attract larger retailers and improve tenant mix. Bedford BC has published a masterplan for the sites in and around the town centre. The

masterplan contained in two documents, Bedford Central town masterplan report and Bedford Ford End Road masterplan report, will be taken into account in determining planning applications.

A2.37 These follow on from successfully completed schemes including Bedford High Street's Townscape Heritage Initiative and the Riverside Bedford development which has delivered a major waterfront scheme to the town, featuring a seven screen Vue cinema, 58 residential apartments, Premier Inn hotel, a large river-fronted public square and eight restaurants.

A2.38 Central Bedfordshire Local Plan (2021) describes Dunstable Town Centre as follows:

"The town as a whole has a relatively high percentage of convenience floorspace (27% compared to the national average of 18%), largely due to the presence of four supermarkets. However, the comparison offer is fairly low and consists of a range of middle to low market offer businesses. Whilst the "traditional" High Street is comparably well occupied, the number of vacant units in the town is marginally higher than the national average.

Significant repositioning and redevelopment is required to revitalise and reinvigorate Dunstable town centre to meet the needs of today's shoppers. There are plans for regenerating Dunstable Town Centre, increasing pedestrian access across the town and enabling new town centre development that benefits the local economy, including new leisure, employment and educational facilities. There is potential to refurbish the Quadrant Shopping Centre and changes have been made to the configuration, which has seen an increase in occupancy. Any redevelopment will need to have regard to the heritage assets found within the town centre, notably Priory Church, a scheduled monument. These contribute to the character and history of Dunstable town centre.

In order to provide additional competitive and appropriate retail space in the town, it is recognised that attention might need to shift beyond the town centre to other nearby locations, such as the Grove Theatre. Another location is the already well-established White Lion Retail Park which has both larger footprint stores accommodating big box retail, and also offers restaurants and leisure uses. The recent opening of the Luton Dunstable Busway with stops adjacent to the White Lion Retail Park also supports this change of focus and, by encouraging sustainable travel from the wider conurbation, will free up the local transport network thus reducing traffic congestion in the town centre."

A2.39 Luton Local Plan (2017) states the following in relation to Luton Town Centre:

"For non-food shopping (comparison goods), the research recommended that the Authority seeks to markedly improve Luton's market share and increase its competitiveness in the face of competition from regional competitors such as Milton Keynes and Watford. However, increasing market share is in-part predicated on the timely delivery of Luton's opportunity sites, which should help provide a step change in the quality of the Luton's comparison offer and are aimed to be delivered by 2025. The delivery of the North Houghton Regis retail scheme will further increase

competition. The research recommends the planned delivery of comparison floorspace to help ensure Luton's status is maintained."

A2.40 The Milton Keynes Retail and Leisure Study 2018 confirms the Centre:MK (CMK) is a vital and viable centre. It lists its strengths as including a good range of shopping and leisure facilities typically found in a centre of its size and position in the retail hierarchy. There is a strong and growing market demand from retail and leisure operators for representation in the town centre and it is performing well in terms of reported Prime Zone A Rents. The centre is also well connected to public transport, however pedestrian links between the station and the centre could be improved. The 2018 study noted that there were a number of key developments in the pipeline (including The Point, the Intu extension, Theatre District refurbishment and Primark taking up the vacant BHS unit) that will further improve the centre's overall offer, attraction and the quality of the environment. Suggested improvements included moving the market into a permanent location, where rents are more affordable, and exploring creating an "independent" quarter in the centre. The Milton Keynes Retail and Leisure Study was updated in March 2024. This confirmed that CMK is a vibrant, unique and highly diverse city centre, with a particularly strong comparison goods offer. Whilst vacancy rates just exceed the national average, these were quickly filled due to a strong demand from new occupiers. The 2024 study identifies the potential for a growth in comparison goods expansion of between 80,90-12,713sqm net to 9,355-14,699sqm net in 2030, depending on the growth scenario, which the study suggests should be directed towards the existing centres.

A2.41 Bletchley town centre predominantly provides a food shopping and service function for its immediate local catchment population, however the Retail and Leisure Study also notes the long-standing aspirations to regenerate Bletchley town centre, which it notes will be facilitated by the reopening of East-West Rail services and the 'Fixing the Links' project aimed at improving linkages between Bletchley railway station and the town centre. The 2024 Retail and Leisure Study notes that the environmental quality of the centre is mixed, with a clear local desire to see parts of the centre re-vamped.

Summary on Retail Impact

A2.42 The work undertaken as part of **Appendix 6** of this Planning Statement (Socio-economic benefits) demonstrates that the Proposed Development will bring significant additional spending into the study area, both from visitors and workers during construction and operation of the Proposed Development.

A2.43 The ERC is delivering an international attraction unlike anything seen in the UK. Whilst elements of the Proposed Development would be open to non-theme park guests, its offer is very different from that provided in the existing centres in the SRCA.

A2.44 The analysis shows that total expected spend in Bedford and Central Bedfordshire (from all types of visitors) is expected to reach almost £175m in the opening year. The socio-economic assessment finds that visitors attracted to the Proposed Development would provide a new source of expenditure for local businesses, increasing existing visitor spending by 4.4% in the CSA compared to the 2031 baseline and 2.9% in the SRCA after excluding spend on visitor accommodation. This uplift drops to 4.2% and 2.4% for the CSA and SRCA in the 2051 baseline visitor spending.

A2.45 The Proposed Development is also very well connected to the surrounding area by existing or planned public transport and active travel routes, such that there will be significant opportunities for linked-trips to the town centres in the study area by means other than the private car.

A2.46 The town centres in the SRCA have proposed plans for inward investment that make them well placed to take advantage of the opportunities created by the Proposed Development and to increase the likelihood of an overall positive impact in retail and leisure provision in the SRCA.

Sequential Test for Main Town Centre Uses

Government Policy on the Sequential Test

A2.47 The sequential test is set out in paragraph 91 of the National Planning Policy Framework (NPPF) (December 2024) as follows:

“91. Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.”

A2.48 Paragraph 95 explains that where an application fails to satisfy the sequential test, it should be refused.

Planning Practice Guidance (PPG)

A2.49 PPG ‘Town centres and retail’ (18 September 2020) contains some helpful guidance on the sequential test as set out in the extracts below:

How should the sequential test be used in decision-making?

The checklist below sets out the considerations that should be taken into account in determining whether a proposal complies with the sequential test:

- *with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. It is important to set out any associated reasoning clearly.*
- *is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.*
- *if there are no suitable sequentially preferable locations, the sequential test is passed.*

In line with paragraph 86 of the National Planning Policy Framework, only if suitable sites in town centre or edge of centre locations are not available (or expected to become available within a reasonable period) should out of centre sites be considered. When considering what a reasonable period is for this purpose, the scale and complexity of the proposed scheme and of potentially suitable town or edge of centre sites should be taken into account.

- *Paragraph: 011 Reference ID: 2b-011-20190722 Revision date: 22 07 2019*

How should locational requirements be considered in the sequential test?

- *Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification will need to be provided where this is the case, and land ownership does not provide such a justification.*
- *Paragraph: 012 Reference ID: 2b-012-20190722 Revision date: 22 07 2019*

A2.50 With regard to the meaning of ‘suitable’ in the context of the PPG, case law in *Tesco Stores Limited v Dundee City Council* [2012] UKSC 13 established that ‘suitable’ means “suitable for the development proposed by the promoter”, not “suitable for meeting identified deficiencies in retail

provision in the area”. This is subject to flexibility and realism from the developer who cannot self-impose requirements or preferences to reject alternative suitable and available sites.

Type of Main Town Centre uses proposed by UDX

A2.51 Main town centre uses are defined by the NPPF as follows:

“Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).”

A2.52 On this basis, the main town centre uses included within the ERC comprise:

- theme park(s), amusement park(s) and/or water park(s);
- hotels;
- indoor and outdoor entertainment facilities, including theatres and cinemas;
- indoor and outdoor sport, recreation, leisure and spa facilities;
- venues with conference and/or convention spaces;
- retail, dining, and entertainment (RDE) uses, including music and dance venues, nightclubs, hot food takeaways, restaurants, drinking establishments, shops and cafes;
- indoor and outdoor cultural facilities, including exhibition spaces, art galleries, museums and prayer rooms; and
- offices (ERC support).

A2.53 The retail, dining and entertainment uses included within the above are proposed in the following areas of the ERC:

- Entry Plaza – located in the Core Zone, this restricted access area is outside of the ‘ticketed’ gate but requires visitors to pass a security screening before entry which accommodates primarily themed retail, bars, restaurant and entertainment uses located immediately outside the Theme Park entrance. It is aimed at encouraging visitors to extend their visit to the ERC by arriving earlier than the Theme Park’s opening time or staying longer after the Theme Park’s closing time. Whilst these uses are designed primarily for Theme Park guests, they could be used by the general public.

- Standalone facilities in the Lake Zone and West Gateway Zone could provide convenience shopping for visitor accommodation guests or other retail, dining and entertainment uses.
- Ancillary retail and food and drink concessions within the Theme Park itself, e.g. restaurants or themed merchandise.

A2.55 It is proposed that there would be an overall floorspace restriction on the level of retail floorspace to be provided and a maximum individual retail unit size (currently proposed to be 1,100sqm GEA) to ensure that the Proposed Development could not be occupied by large format retail stores, which is not UDX's operating concept. Such restrictions are contained in the Design Standards (Table MF01).

A2.56 Further detail on the reasons why the main town centre uses within the ERC cannot be separated from each other are provided below before compliance with the sequential test is considered. All of the main town centre uses included in the ERC are either a central component of its offer or are meeting a specified need in the ERC. Importantly, the ERC will create a critical mass that will generate demand for the constituent uses within it and each of the uses rely on the close proximity of the other to thrive. As stated above, it is anticipated that the town centres in the SRCA will also see an increase in demand for retail, hotel and leisure uses that will take advantage of the increased expenditure generated by the ERC (see further below), but this will cater for a different demand to those uses within the ERC.

Retail, dining and entertainment (RDE) uses

A2.57 All UDX ERCs worldwide include RDE components as part of their central offerings. It is part of the operating model. The Entry Plaza element of the RDE proposed also serves to extend visit times. It therefore has a practical purpose linked to the function of the Theme Park and a planning benefit of, for example, spreading trips and avoiding overcrowding at the entrances and decreasing traffic for guests seeking RDE offerings. This same function and benefit could not be achieved by a site remote from the ERC.

A2.58 As the RDE uses are a central part of the operating model, they can only be located in close proximity to the Theme Park and cannot be separated from it. In this regard, it is relevant that the PPG recognises that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. In this case, the locational requirement for the RDE proposed is that it is located within the ERC, based on the market demand and volume of trade captured in there, which cannot be replicated away from the

ERC. There will also be a demand for retail, dining and entertainment uses within the town centres as a result of an increase in spending in the Study Area (as explained earlier), but this won't satisfy the particular demand closer to and within the ERC.

A2.59 The PPG also provides guidance that it is appropriate to consider what contribution more central sites are able to make individually to accommodate the proposal. In this case, central sites could not make a contribution, as they would not meet the need for the RDE uses within the ERC.

Supporting offices within the ERC

A2.60 The offices proposed will all be associated with the ERC. These offices serve an administrative function for employees of the ERC and therefore cannot be separated from it, hence town centre and edge of centre sites would not be suitable to meet the need.

Hotels and Conference Facilities

A2.61 The hotels and conference facilities proposed are also an integral part of the ERC. The hotels proposed serve an important function in mitigating transport impact through managing traffic flows to the Site and reducing the number of guests arriving and departing at peak times on the highway network. Therefore, they cannot be separated from the ERC and town centre and edge of centre sites would not be suitable to meet the need. The conference facilities proposed are part of the ERC and part of what is needed to make this ERC the best in Europe. Similar facilities are provided in Orlando where delegates can attend conferences and then benefit from the leisure and entertainment options available at the Theme Park.

Sports complex with indoor and/or outdoor playing fields and venues

A2.62 The proposed sports complex will allow the proposed ERC to compete internationally with resorts such as Port Aventura World in Spain, which has a similar offering. Its intended purpose would be primarily to host international and national youth games, whilst also providing facilities which would be available for local community use. Participants and their families can attend games and then benefit from the leisure and entertainment options available at the Theme Park without needing to travel, decreasing the impact to the roadway network. It is therefore forms part of the ERC.

Applying the Sequential Test to the Entertainment Resort Complex

A2.63 As explained above, all of the main town centre uses proposed are an integral component of the ERC and cannot be separated from it. For these reasons, compliance with the sequential test is

considered only for the ERC as a whole. The main town centres within the Study Area (taken as the Local Authority areas of Bedford, Central Bedfordshire, Milton Keynes and Luton) for the purposes of considering compliance with the sequential test are Bedford Town Centre, Centre:MK Milton Keynes, Luton Town Centre and Dunstable Town Centre.

A2.64 This Planning Statement has explained why the Site has been identified as a suitable location for a UDX ERC. The requirements of a suitable location included the following:

- Good transport links for national and international visitors, including close proximity to an existing or potential railway station and a motorway or main A road, as well as no more than a 2-hour drive from London.
- Site size greater than 200 acres (80.94ha, preferably in single ownership, to facilitate the Proposed Development.
- Site to be relatively flat to reduce requirements for levelling/profiling, and site shape that facilitates Theme Park development; and
- Host Local Authority that was supportive in principle, including suitable local planning policy or allocation that might accommodate a Theme Park.

A2.65 In addition, other planning considerations were taken into account including:

- Suitability of the surrounding area for a theme park and resort development.
- Adequate employment catchment.
- Presence of educational institutions to provide workforce training.
- Site availability.

A2.66 UDX worked with agents to identify suitable and available sites that met the above criteria.

A2.67 In relation to these criteria, UDX also worked with Bedford BC to determine whether a town centre site would be suitable, if one was available, and it was considered, notwithstanding that no sites met the minimum size requirement, that a town centre site would be likely to result in unacceptable impacts in terms of accommodating the volume of visitors anticipated. Instead, a site which had good links and access to the town centre, whilst being geographically separate from it, was preferred. Indeed, the local authority advised that the town centre was not equipped to accommodate the number of guests that would be drawn to this development.

A2.68 It is recognised that a different developer has previously given consideration to the development of a major theme park (known as the London Resort) in Swanscombe, Kent, and submitted a Development Consent Order (DCO) application in 2020. The application for a DCO for the London Resort was withdrawn in 2022 following Natural England's intention to have the site designated as a Site of Special Scientific Interest. Given the statutory designation of the site as a Site of Special Scientific Interest, and due to viability and economic reasons, it was not considered a viable alternative by UDX. This site is not in a town centre or edge of centre location.

A2.69 UDX also identified a potentially suitable site to the northeast of Milton Keynes, close to Junction 14 of the M1 (the Newport Road site), which is located within a Strategic City Extension in the draft Milton Keynes Local Plan 2050, proposed to deliver 16,000 new homes and 40 ha of employment land, designed around a new public-transit network. Commercially acceptable terms could not be agreed on this site and therefore it is not viable. It is also now proposed for alternative mixed-use development, in line with the policies of the draft MKDC Local Plan 2050 and is therefore not available. In any case, it is not within or on the edge of a town centre.

A2.70 No town centre or edge of centre sites are therefore suitable and available to meet the need for the ERC and therefore the sequential test is passed.

Potential impact on vacant town centre sites in Bedford Town Centre and other town centres in the study area

A2.71 In addition to the above considerations, it is helpful to consider overall outcomes of the Proposed Development on town centres in the context of what the NPPF is trying to achieve. The sequential test for main town centre uses is there to assist in the creation of vital and viable town centres and make sure that where suitable, available and viable town centre sites exist, that these are preferred over edge of centre, and then out of centre, locations.

A2.72 In this case, as set out in the **Planning Statement** and **ES Chapter 13: Socio-Economic Chapter (Volume 1)**, the Proposed Development is resulting in a significant increase in spending, both as a result of new visitors to the area, but also through increased local employment opportunities who would then spend their money locally. This would likely have knock on beneficial effects for the long-term viability of the existing retail and leisure landscape across the town centres in the area. An analysis to further demonstrate this point will be provided in the documents which will support the planning proposal submission to MHCLG.

APPENDIX 3: CONSIDERATION OF PROPOSED DEVELOPMENT AGAINST PLANNING ACT THRESHOLDS FOR HIGHWAY WORKS

A3.1 The Promoters have prepared an NSIP Construction Areas drawing which is provided at Figure P320-VEC-HGN-SW-SK-CH-0146-P03.

A3.2 This shows that the land for the proposed elements of the highway works where it is intended that National Highways will be the highway authority (and adjoining land expected to be used in connection with their construction) and the speed limit is expected to be 50 miles per hour and above, is below the NSIP threshold. This is explained in more detail below.

A3.3 The following sections of the Planning Act 2008 are relevant when determining whether or not the highway development falls within the definition of an NSIP:

1. **Section 14(h):** “Highway related development” may constitute a “nationally significant infrastructure project”.
2. **Section 22(1):** Highway related development is within section 14(h) only if the development meets certain criteria.
3. **Section 22(2):** The construction of a highway constitutes an NSIP only if:
 - a. the highway will (when constructed) be wholly in England;
 - b. the Secretary of State or a strategic highways company will be the highway authority for the highway; and
 - c. the area of development is greater than the relevant limit in Section 22(4).
4. **Section 22(3):** The alteration of a highway constitutes an NSIP only if:
 - a. the highway is wholly in England;
 - b. the Secretary of State or a strategic highways company is the highway authority for the highway; and
 - c. the area of development is greater than the relevant limit in Section 22(4).
5. **Section 22(4):** The relevant limit:
 - a. in relation to the construction or alteration of a motorway is 15 hectares;
 - b. in relation to the construction or alteration of a highway other than a motorway where the speed limit for any class of vehicle is expected to be 50 mph or greater is 12.5 hectares;
 - c. in relation to the construction or alteration of any other highway is 7.5 hectares.
6. **Section 22(9):** “area of development” means:
 - a. in relation to the construction of a highway, the land on which the highway is to be constructed and any adjoining land expected to be used in connection with its construction; and

- b. in relation to the alteration of a highway, the land on which part of the highway to be altered is situated and any adjoining land expected to be used in connection with its alteration.

A3.4 The plan shows the area of development in relation to the highway related development as follows:

- the land on which the highway is to be constructed where speed limits are 50mph or greater shaded **yellow**; and
- the land expected to be used in connection with the construction of the outlined in **blue**.

A3.5 Whilst the area in blue is not strictly 'adjoining land' (in accordance with section 22(9)(a)), it is land where construction access and a construction compound is expected to take place and so has been included on a precautionary basis.

A3.6 The highway development is the construction of highway other than a motorway where the speed limit is expected to be 50mph or greater. The relevant limit for the area of development is therefore 12.5 hectares in order for the highway development to fall within the definition of an NSIP.

A3.7 The total area of development is 11.86 hectares. This is below the relevant limit, and the highway works are therefore below the NSIP threshold.

APPENDIX 4: SUMMARIES OF AGREED POSITIONS WITH STATUTORY CONSULTEES

Summaries of Agreed Position with:

- Bedford BC
- Department for Transport (DfT)
- Ecology and Ground Conditions and Remediation: Environment Agency
- Water resources: Environment Agency and Bedford Group of Internal Drainage Boards
- Natural England
- Historic England
- Health and Safety Executive (HSE)
- Forest of Marston Vale Trust
- Cranfield Airfield
- Old Warden Aerodrome
- Uk Power Networks (UKPN)
- Anglian Water

Letters of Support from:

- Bedfordshire, Northamptonshire & Milton Keynes, Cambridgeshire and Hertfordshire Chambers of Commerce
- Bedfordshire Police
- Wixams Parish Council
- Stewartby & Kempston Hardwick Parish Council
- East of England Ambulance Service NHS Trust
- Bedfordshire Fire & Rescue Service
- Govia Thameslink Railway Ltd



Universal Destinations and Experiences UK Project

Summary of Agreed Position between Universal Destinations and Experiences and Bedford Borough Council

May 2025

1. INTRODUCTION

1.1. Purpose of this Agreed Position Summary

- 1.1.1. This Agreed Position Summary ("APS") has been prepared by Universal Destinations and Experiences ("UDX") and Bedford Borough Council ("Bedford BC"). For the purpose of this APS, UDX and Bedford BC will jointly be referred to as "the Parties".
- 1.1.2. UDX 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.
- 1.1.3. 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 located entirely within the Bedford Borough Council's administrative area. 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 Entertainment Resort Complex (ERC) lying within these zones comprises a theme park and related 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 and processing facilities associated with the ERC; vehicle parking, maintenance and servicing; access routes and circulation spaces; landscaping; utility conveyance infrastructure; and use of land necessary to support construction.
- 1.1.4. The planning proposal includes road and rail-related development including:
- a new slip road to provide access to and from the A421;
 - an expanded railway station on the Thameslink/Midland Main Line at Wixams;
 - improvements to Manor Road; and
 - improvements to certain other local roads.
- 1.1.5. 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.
- 1.1.6. Overall, it is intended that this APS will be submitted alongside the planning proposal to give a clear position of the state and extent of agreement between the Parties as at the date on which this APS is signed.

2. MATTERS AGREED BETWEEN THE PARTIES

2.1. Introduction

2.1.1. This Agreed Position Statement has been prepared following extensive engagement with UDX and Bedford Borough Council planning and technical officers, for which they have been given delegated authority to respond on behalf of the authority. It sets out the agreed position on planning policy and technical matters, including methodology and approach to environmental impact assessment topics. Bedford BC will need to take a final report on the planning application consultation for executive approval, to exercise the Council's constitutional responsibilities.

2.1.2. The APS sets out specific matters that have been agreed in relation to the basis of and approach to Environmental Impact Assessment, and EIA technical matters relating to the Transport Assessment, Cultural Heritage, Landscape and Visual Impact, Air Quality, Noise, and the Committed Developments considered by the Cumulative Effects assessment.

2.1.3. This APS also records the Parties' position on matters pertaining to rail, roads, potential footpath improvements out with the Proposed Development boundary, local services, and employment and skills.

2.2. Environmental Impact Assessment

2.2.1. The parties are AGREED on the project description as set out in Chapter 2: Description of Proposed Development (Environmental Statement (ES Volume 1) and AGREED that this is an appropriate basis for assessment.

2.2.2. The parties are AGREED on the approach to Environmental Impact Assessment (EIA) as set out in the Chapter 3: Approach to EIA (ES Volume 1).

2.3. Transport Assessment

2.3.1. Bedford BC AGREES with the professional judgements and conclusions set out in **Table 1** (Annex 1). It is satisfied that the planning proposal has been properly assessed that the effects are within reasonable bounds. Bedford BC recognise that the Transport Assessment will be used by the decision maker in assessing the impact, mitigation and benefits of the proposed development.

2.3.2. The Parties are AGREED on the Transport Assessment, and specific matters as set out below:

Transport Assessment Assumptions and Methodology

2.3.3. Bedford BC has worked closely with UDX and agencies of the Department for Transport (DfT) to develop solutions for transport infrastructure that are appropriate and deliverable. It has been party to the evolution of the transport assessment methodology and the assumptions used for the purpose of assessment. It has carefully considered the assessment and the results of the assessment in the context of the planning proposal. Bedford BC will continue to work together to address any variation of effects and any mitigation which may need to be implemented to address additional impacts from any element of the Proposed Development.

2.3.4. Bedford BC agrees that the scope of the transport assessment, and the assessment assumptions, including those summarised in **Table 1** (presented in Annex 1 to this document), are reasonable and appropriate for the purpose of assessment. It is cognisant of the inevitable limitations associated with the assumptions and the mathematical assessment. It is satisfied that in the round, the context and

the proposed monitoring strategy, these are a reasonable basis on which to make professional judgements about effects and the importance of the effects.

- 2.3.5. In the course of the promotion and assessment of the planning proposal, a Microsimulation Model has been built and employed. Bedford BC has been party to the scoping and evolution of that model. It is satisfied that the model is suitable for the purpose of this assessment.

Transport Mitigation

- 2.3.6. Bedford BC is satisfied that the transport mitigation that forms part of the planning proposal is acceptable. It is satisfied that it adequately mitigates the effects of the planning proposal, considering the context and the monitoring strategy to be secured with the planning permission if granted.
- 2.3.7. National Highways has worked with UDX to design a new junction on the A421. Bedford BC has worked with UDX to design new roads through the site that will connect with the new junction on the A421 and for which Bedford BC will become the highway authority, and in the modification of existing roads for which Bedford BC is the highway authority. Bedford BC is satisfied that the highways works proposed as part of the scheme will be sufficient to appropriately accommodate the likely demands for traffic movement.

Transport Assessment Effects

- 2.3.8. There will be residual effects on the highway network as a result of the planning proposal. The network will be busier in what are currently off-peak periods. This will be noticeable at times.
- 2.3.9. It will also be busier in what are currently weekday peak periods. It is unlikely that any effects at this time will be greater than marginal and in the context of planning policy in the NPPF, this would not result in an unacceptable impact on highway safety, or severe residual cumulative impacts on the road network, following mitigation and the monitoring strategy to be secured with the planning permission, if granted.

2.4. Noise

- 2.4.1. The Parties are AGREED on the scope and approach of the Noise and Vibration Assessment as set out in the 9.3 and 9.4 of Chapter 9: Noise and Vibration (ES Volume 1), and Appendices 9.2: Construction Noise and Vibration Assessment, 9.3: Construction and Operational Road Traffic Noise Assessment, and 9.4 Operational Noise Assessment (ES Volume 3).
- 2.4.2. The Parties are AGREED on the proposed noise controls and mitigation measures during the Construction Phase as set out in Appendix 2.3 Outline Construction Environmental Management Plan (ES Volume 3).
- 2.4.3. Bedford BC acknowledges that the assessment criteria for the Core Zone noise have been derived considering typical noise levels generated at other UDX parks, evidence on acceptable noise limits drawing on UK British Standards and guidance documents and World Health Organisation publications and the anticipated change in noise level at all receptor control locations.
- 2.4.4. The Parties are AGREED on the proposed noise controls and mitigation measures during the Operational Phase as set out in sections 9.4.24 and 9.7 of Chapter 9 Noise and Vibration (ES Volume 1) and Appendix 9.5: Demonstration of Compliance with Core Zone Noise Limits.

2.5. Cultural Heritage

2.5.1. The Cultural Heritage topic comprises known or potential buried heritage assets (archaeological and paleoenvironmental remains) and above ground heritage assets (structures and landscapes of heritage interest) within or immediately around the Proposed Development. It also includes, where appropriate, the setting of significant heritage assets and how they are understood and appreciated.

2.5.2. ES Chapter 10 provides an assessment of the environmental effects associated with this topic. The ES Chapter is supported by the following technical appendices:

- Appendix 10.1: Historic Environment Desk-Based Assessment (ES Volume 3).
- Appendix 10.2: Archaeological Trial Trench Evaluation Report (ES Volume 3).
- Appendix 10.3: Draft Archaeological Mitigation Strategy (ES Volume 3).

2.5.3. ES Chapter 10 Section 10.2 and Table 10.1 presents a summary of the engagement undertaken with key stakeholders, including Bedford BC.

Scope and methodology for Cultural Heritage baseline assessment

2.5.4. Bedford BC requested (email dated 5 April 2024) a minimum 5km radius be used to assess impacts to above ground heritage assets, perhaps extending to highly graded assets within a 10km radius. The study area was set at 5km in line with this engagement response. The assessment scoped in assets located between 5km and 10km from the Site on a case-by-case basis, particularly those of the highest significance, based on a desk-based assessment and the results of the site visits. On this both parties are AGREED.

2.5.5. In line with Historic England guidance on setting (Historic England 2017 The Setting of Heritage Assets), and as set out in sections 2.3 and 3.1 of Appendix 10.1: Historic Environment Desk-Based Assessment (ES Volume 3), heritage assets within and beyond the 5km study area were filtered (scoped in/out) and assessed on a case-by-case basis, using a desk-based assessment and the results of several site visits. This was a significant and carefully considered undertaking. Section 6.1 (Table 3) of ES Appendix 10.1 Historic Environment Desk-Based Assessment (ES Volume 3) provides the rationale for why heritage assets were scoped out based on desk-based assessment, site visits and expert professional judgement. Appendix B of ES Appendix 10.1 Historic Environment Desk-Based Assessment (ES Volume 3) presents those many above ground heritage assets where impacts to their significance through proposed changes to setting and how the asset is understood and appreciated is not considered significant in EIA terms, due to intervening built form, topography, vegetation, limited views of the Proposed Development, where views towards the Site do not significantly contribute to the asset's significance, or such.

Site-based archaeological evaluation

2.5.6. Appendix 10.2: Archaeological Trial Trench Evaluation Report (ES Volume 3) provides the results of preliminary site-based fieldwork undertaken in support of the ES.

2.5.7. The scope and methodology for the evaluation was undertaken in close consultation with Bedford BC and is AGREED. This included approval of the Written Scheme of Investigation / WSI (WSP/AOC 2024) in advance of the work, following a face-to-face meeting between WSP and Bedford BC Heritage and Planning Compliance Manager and the Archaeological Officer at the Bedford BC council offices on 20 March 2024 and following subsequent written comments via email (25 March 2024). The WSI is a design document that sets out the scope and methodology for the work; it has not been reproduced as an appendix as Appendix 10.2: Archaeological Trial Trench Evaluation Report (ES Volume 3) essentially presents the salient contents of the WSI with respect to the agreed

scope and method for the work. The Bedford BC Archaeological Officer attended the Site on a number of occasions, along with WSP who were managing the fieldwork, to ensure that the work was being carried out to the agreed scope and methodology and to expected professional standards. The Bedford BC Archaeological Officer also 'signed off' the fieldwork following its satisfactory completion.

Scope of archaeological mitigation

2.5.8. At the face-to-face meeting between WSP and Bedford BC Heritage and Planning Compliance Manager and the Archaeological Officer at the council offices on 20 March 2024, it was AGREED that the results of the evaluation will form the basis of defining areas of targeted archaeological mitigation. This approach is set out in Appendix 10.3: Archaeological Mitigation Strategy (ES Volume 3).

2.5.9. Bedford BC Archaeological Officer was provided with a draft Appendix 10.3: Archaeological Mitigation Strategy (ES Volume 3) for review. Comments (email dated 1 October 2024) have been incorporated into the document and the general scope and approach that has been set out in the draft strategy is AGREED. The strategy forms the basis for Site-Specific WSIs for mitigation (one for each Proposed Development Zones; Core Zone, Lake Zone, East Gateway Zone and West Gateway Zone).

2.6. Air Quality

2.6.1. On 10 April 2024, the Parties met to discuss matters pertaining to the Proposed Development. During the meeting, WSP (on behalf of UDX) presented the proposed scope and approach of the assessment of the Air Quality impacts of the Proposed Development to Bedford BC Regulatory Services. The Parties AGREED that:

- The scope of the assessment of the Air Quality impacts of the Proposed Development as defined in the section entitled Consultation, Scope and Study Area within Chapter 8 Section 8.3 of the ES is an appropriate basis upon which to produce the ES chapter.
- The methodology for the Air Quality assessment, including assumptions used, as presented in Chapter 8 Section 8.4 of the ES is considered appropriate.
- Bedford BC air quality monitoring data show that ambient concentrations nitrogen dioxide (NO₂) are declining, and within the Bedford Town Centre Air Quality Management Area (AQMA) the air quality standards for NO₂ are now generally met, with the possible exception of a notable hotspot on Prebend Street between Commercial Road and Midland Road.

2.7. Water Resources

2.7.1. The Parties are AGREED that notwithstanding that Bedford BC is the Lead Local Flood Authority for the Proposed Development, the matters relating to works to watercourses in the Bedford Group of Internal Drainage Boards (IDB) area will be deferred to consultation with the relevant Board.

2.8. Landscape and Visual

2.8.1. The approach to the landscape and visual impact assessment (LVIA) of the Proposed Development, including the extent of the study area and viewpoints referred to in the assessment, is AGREED between the parties and has been informed by consultation between the Parties as set out below.

2.8.2. On 21 March 2024, the Parties met to discuss matters pertaining to the Proposed Development. During the meeting, WSP (on behalf of UDX) confirmed the proposed approach to landscape and visual impact assessment (LVIA) of the Proposed Development to Bedford BC and the council landscape advisory service provider (LDA Design).

2.8.3. Viewpoints selected for the LVIA were confirmed in consultation between the Parties. As set out in Section 7.3 of Chapter 7 Landscape and Visual Impact Assessment (ES Volume 1) and Appendix 7.2: LVIA Consultation (ES Volume 3). Bedford BC suggested twelve additional viewpoints to those originally identified for inclusion in the LVIA. The majority of these additional viewpoints were included within the assessment. Suggested receptors for additional viewpoints 1, 2, 11 and 12 were already covered by existing representative viewpoints (RVPs) or minor modifications to proposed viewpoints, so these were excluded from the scope. In light of the comments received RVP 23 was scoped out, and proposed viewpoints 5 and 23 combined to a single location – RVP 38.

2.9. Committed Developments and Site Planning History

2.9.1. The approach to identifying potential Committed Developments in order to undertake an assessment of the cumulative effects of the Proposed Development, both in terms of size/scale of development and distance from the Site boundary, was agreed in consultation with Bedford Borough Council (Bedford BC) and Central Bedfordshire Council during April 2024. The following criteria were agreed upon:

- The search area would extend 10km from the Site boundary based on professional judgement as a cautious worst case scenario¹;
- Nationally Significant Infrastructure Projects;
- Developments which have submitted a request for an EIA Scoping Opinion;
- Developments with a proposed area of >1ha and or a max. height of > 15m;
- Developments under construction although not yet completed;
- Developments which have been permitted within the last five years but are yet to be constructed/implemented;
- Submitted application(s) for a development that are awaiting determination; or
- Submitted applications(s) for a development that have been refused and are subject to appeal procedures.

2.9.2. Committed developments were considered regardless of whether or not they were EIA development.

2.9.3. On 29 April 2024, Bedford BC confirmed that they had no comments on the approach to identifying Committed Developments and agreed with the short list of Committed Developments.

2.9.4. The Committed Development List was further refreshed in January 2025, at which time an additional 8 developments were added to the short list of developments to be considered in the cumulative effects assessment, and the cumulative effects assessment updated accordingly. The updated Committed Development List and short list of developments identified for cumulative assessment were shared with Bedford BC in April 2025. Bedford BC confirmed that they AGREED with the refreshed short list of Committed Developments, and to the cut off date of week commencing 27 January 2025 such that no projects entered into the planning portal system beyond this date need to be included in the cumulative effects assessment.

2.9.5. The Planning History for the Site as set out in Table 3 of the Planning Statement is AGREED.

¹ 10km was established as the broadest relevant ZOI as set by the Landscape and Visual assessment, apart from Socio-economics and Traffic and Transport whose study areas stretch beyond the 10km.

2.10. Rail

- 2.10.1. The Parties are AGREED on matters pertaining to rail as set out below.
- 2.10.2. The planning proposal includes a railway station at Wixams.
- 2.10.3. There is a current proposal, which was being promoted by Bedford BC, for a two-platform station at Wixams to serve the Wixams new settlement. This proposal includes platforms on the 'slow' lines. It will be sufficient for stopping trains on the Thameslink service for parts of the week, but not all of the week. It will not enable East Midlands Railway (EMR) trains to stop at Wixams. It does not have a sufficient level of service to accommodate the demands of the planning proposal. The planning proposal includes a larger station at Wixams instead of the two-platform proposal. The larger station includes four platforms serving all four railway lines. This enables trains to stop at all times during the week, and enables the EMR trains, as well as Thameslink trains, to stop at Wixams. In addition to retaining the original approved eastern plaza, the new proposal adds a new 'western plaza' which provides shuttle services between the station and the remainder of the planning proposal. Bedford BC agrees that there are significant benefits to the wider local community for this expanded Wixams station proposal including both an eastern and western access to the four-platform proposal.
- 2.10.4. The Proposed Development will replace wholesale the full planning permission for Wixams (reference 23/02629/MDC3) and the four-track, four platform option will be entirely built out pursuant to the planning proposal submission. No changes are proposed to the works to the east of the Network Rail tracks and these will continue to be implemented as approved by extant planning permissions (outline planning permission reference 11/01380/M73 and reserved matters consent reference 23/02136/M73). [YM1]
- 2.10.5. The planning proposal provides the potential for the EWR Railway Line to maximise its value in sustainability terms by attracting passengers to rail, in social terms by maximising accessibility to a wide sector of society, and by maximising use of the new railway infrastructure that the Government is investing in.
- 2.10.6. The planning proposal safeguards land for a new station on the EWR line between Bletchley and Bedford. A new station in the vicinity of Stewartby is an aspiration of EWR Company, and this is supported by Bedford BC. The safeguarded land provides an opportunity for, and facilitates, that aspiration.

2.11. Roads

- 2.11.1. Separate to the Proposed Development, Network Rail proposes to replace the Manor Road level crossing of the Marston Vale Railway Line with a grade separated crossing (i.e. a road bridge over the railway). It is not yet definite that the grade separated crossing 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 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 bridge to connect the platforms at Kempston Hardwick Station. The Proposed Development would therefore provide active travel connections to the new pedestrian bridge, while the highways to east of the Marston Vale 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 line.

2.11.2. Bedford BC supports UDX's preferred solution for the Manor Road level crossing, which is for the level crossing to be closed and to be replaced by an active travel only bridge (Option B). .

2.12. Active travel

2.12.1. The planning proposal provides for excellent active travel facilities within the Site. This forms the catalyst for Bedford BC to work with partners to improve and grow the local connections and other active travel networks in the wider community.

2.12.2. Bedford BC acknowledges that there will be ongoing and active liaison between UDX, Bedford BC, the DfT and the transport operators once the Proposed Development becomes operational. It assumes that UDX and the transport operators will work together, anticipating evolutions in demand or changes from the norm, and acting accordingly. UDX advises that active and constant management of its operation is a normal part of its business. The Proposed Development commits to connecting that day-to-day management of travel planning with regular and meaningful liaison with the transport operators.

2.12.3. UDX commits to forming forums, with participation of Bedford BC, to address the following matters:

- Transport Steering Group: A forum established for relevant stakeholders will be able to address matters pertaining to transport, including the Proposed Development's Construction Traffic Management Plan, active travel and sustainable travel.

2.12.4. The Parties AGREE that UDX will be a participating member of the Bedford Local Resilience Forum.

2.13. Employment and Skills

2.13.1. The Parties are AGREED to the Employment and Skills Plan and the roles and responsibilities of the Parties as set out therein.

2.14. Temporary Workforce Accommodation Strategy

2.14.1. A Temporary Workforce Accommodation Strategy has been developed to assess the capacity of Bedford BC and surrounding local authorities to meet the likely accommodation needs of the construction workforce.

2.14.2. While best efforts have been made to accurately estimate the number of construction workers requiring accommodation, there remains a degree of uncertainty, particularly in relation to cumulative demand from other construction schemes. To address this, a robust mitigation and monitoring framework has been proposed to ensure close cooperation with Bedford BC as construction develops as set out below.

Ongoing monitoring (from Q1 2028)

2.14.3. The Principal Contractor(s) will be responsible for:

- Preparing regular monitoring reports that include:
 - The number of construction workers using serviced accommodation within Bedford BC and Central Bedfordshire Council (CBC) areas;

- An assessment of the demand for serviced accommodation against agreed thresholds;
- A clear summary of whether mitigation measures need to be initiated; and
- Updates on the implementation of any mitigation measures, if required.
- Appointing a dedicated point of contact (“temporary workforce accommodation liaison”) to:
 - Liaise with Bedford BC, CBC, and local stakeholders;
 - Offer a booking service for contractors and workers to coordinate accommodation use;
 - Build and maintain relationships with local hotel providers to track capacity and demand

Threshold-based mitigation

- 2.14.4. If monitoring identifies that 535 or more construction workers are using serviced accommodation, the Principal Contractor(s) and/or UDX will work to implement mitigation measures to reduce this demand.
- 2.14.5. If the threshold of 535 workers is still exceeded for the following two quarters, the Principal Contractor(s) must provide temporary accommodation, unless Bedford BC or CBC issues a formal written confirmation that this is not necessary.
- 2.14.6. All monitoring and mitigation matters will be discussed at quarterly meetings, scheduled in advance. These will be attended by the temporary workforce accommodation liaison and UDX, ensuring transparency and coordinated decision-making.
- 2.14.7. On 29 April 2025, UDX met with BBC to discuss the monitoring and mitigation proposed. The Parties are AGREED on the Temporary Workforce Accommodation Strategy

2.15. Retail Impact and Sequential Test

- 2.15.1. The Parties are AGREED on matters relating to the Retail Impact and Sequential Test as set out below.

Provision of Main town centre uses

- 2.15.2. UDX is proposing a major new Entertainment Resort Complex (ERC) of which there is currently no comparable in the UK.
- 2.15.3. The ERC will deliver a world class tourism destination building on UDX’s industry-leading experience in building, owning and operating ERCs. The ERC will be an international destination, emulating the experiences that UDX already delivers to millions of people every year in its existing resorts across the globe. Delivering such a place is about more than just a theme park and to be successful and fully capitalise on the benefits to UK Plc, 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, leisure and restaurant facilities and conference facilities which together provide customers with the full range of entertainment facilities and places to stay that will ensure that this project is successful. 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.

Retail impact

- 2.15.4. As the provision of town centre uses are complementary to the ERC, a traditional impact assessment would not be appropriate.

2.15.5. Bedford BC agrees with the analysis in Appendix 2 of the Planning Statement which concludes:

- The Proposed Development would provide a new source of expenditure for local businesses, increasing existing retail turnover by 4.2% in the Core Study Area (CSA) compared to the 2031 baseline and 2.7% in the Sub Regional Context Area (SRCA) after excluding spend on hotels. This uplift drops to 2.3% and 1.4% for the CSA and SRCA in the 2051 baseline turnover.
- Assuming a cautious worst case scenario whereby all primary resident spending is drawn from existing town centres in Bedford and Central Bedfordshire, this would equate to a reduction of 1.8% in town centre spending, however this is not considered realistic, given the increase in visitor spending projected. Therefore, even in the worst case scenario, businesses in Bedford and Central Bedfordshire town centres can expect to benefit from the trade creation associated with the proposed ERC, even if there may exist some trade diversion for primary residents.

Sequential test

2.15.6. The Proposed Development is for an ERC. All of the main town centre uses included in the ERC are either a central component of its offer or are meeting a specified need in the ERC and cannot be separated from each other. Importantly, the ERC will create a critical mass that will generate demand for the constituent uses within it and each of the uses rely on the close proximity of the other to thrive.

2.15.7. In this case, the locational requirement for the retail, dining and entertainment uses proposed is that it is located within the ERC, based on the market demand and volume of trade captured there, which cannot be replicated away from the ERC. There will also be a demand for retail, dining and entertainment uses within the town centres as a result of an increase in spending in the Study Area, but this won't satisfy the particular demand closer to and within the ERC.

2.15.8. Bedford BC agrees that, as all of the main town centre uses proposed are an integral component of the ERC and cannot be separated from it, compliance with the sequential test is required only for the ERC as a whole.

2.15.9. UDX's criteria for determining a suitable location for an ERC are set out in the Planning Statement.

2.15.10. UDX worked with Bedford BC to determine whether a town centre site would be suitable, if one was available, and it was considered, notwithstanding that no sites met the minimum size requirement, that a town centre site would be likely to result in unacceptable impacts in terms of accommodating the volume of visitors anticipated. Instead, a site which had good links and access to the town centre, whilst being geographically separate from it, was preferred. Indeed, Bedford BC's position is that the town centre was not equipped to accommodate the number of guests that would be drawn to this development.


2.15.11. No town centre or edge of centre sites were identified that were suitable and available to meet the need for the ERC and therefore it is agreed that the sequential test is passed.

MATTERS YET TO BE AGREED BETWEEN THE PARTIES

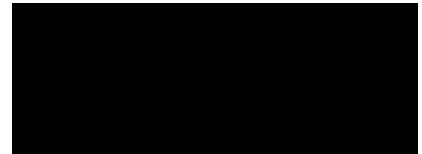
The Parties confirm that the following areas are TO BE AGREED by the Parties;

None.

APS is prepared jointly and agreed by the parties.

Signed by 
Senior Vice President, Public Affairs

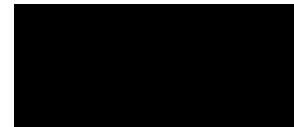
For and behalf of UDX



Date: 16th May 2025

Signed by , Deputy Chief Executive

For and behalf of Bedford BC



Date: 16th May 2025

Annex 1 – Table 1

Table 1 – Summary of Assumptions – Transport

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
Entertainment Resort Complex (ERC)						
1	Proposed Development (Core Zone)	Theme Park (TP) Entertainment Resort Complex Support Entry Plaza (EP) TP & EP car park and coach park Hotel (500 bedrooms) Valet Parking service area Transport Hub Team Member Car Park	ES Chapter 2: Description of Proposed Development (Volume 1) and ES Part 4 – Appendix 5.1-Transport Assessment – para 4.9	Likely	N/A	M&M
2	Proposed Development (Lake Zone)	Business Hotels (2000 bedrooms) Hotels/Accommodation (3370 bedrooms) Entertainment Resort Complex Support Only applies to Future Year – not built in Primary Opening Year - 1724 Staff (additional to Core Zone Team Members) Guests are linked to Core Zone visitors or Convention Centre visitors	ES Chapter 2: Description of Proposed Development (Volume 1) and ES (Part 4) – Appendix 5.1-Transport Assessment – para 4.9 and para 4.31	Used for purpose of assessment. Except for a proportion of the business hotel rooms that are associated with the convention centre (see below) all are largely related to activities in Core Zone.	Low	M&M

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
2a	Convention Centre (Lake Zone)	<p>Convention Centre (gross internal area (GIA) 55,000sqm)</p> <p>Only applies to Future Year – not built in Primary Opening Year</p> <p>– Standalone / Not related to Core Zone activity only for the purpose of trip generation in the Transport Assessment</p> <p>- 200 Staff (additional to Core Zone Team Members)</p>	ES (Volume 3) – Appendix 5.1-Transport Assessment – para 4.31b	<p>Cautious worst case</p> <p>Used for purpose of assessment. (assessment assumes a 3000 delegate event every day but in reality not all days will host events)</p>	Low	M&M

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
3	Proposed Development (West Gateway Zone)	<p>Highway Service Area (16 pumps) Restaurants (up to 5,866 sq.m) Hotel (200 bedroom) Entertainment Resort Complex Support</p> <p>Only applies to Future Year – not built in Primary Opening Year</p> <p>Only applies to Future Year – not built in Primary Opening Year</p> <ul style="list-style-type: none"> - Demands assessed using traditional methods based retail type and floorspace. - 75% of restaurant customers linked to Core Zone Visitors (25% additional to Core Zone) - 50% of a.m. and 75% of p.m. Highway Service Area customers linked to Core Zone Visitors. Remainder are additional to Core Zone) - 75% of Hotel guests linked to Core Zone Visitors (25% additional to Core Zone) 	ES (Volume 1) - Chapter 2: Description of Proposed Development and ES (Volume 3) – Appendix 5.1 Transport Assessment – para 4.9	<p>Representative in terms of trips</p> <p>Used for purpose of assessment. Largely related to activities in Core Zone.</p>	Low	M&M
Total Visitors Core Zone						

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
4	Total Annual Visitors to Core Zone	8.5M Primary Opening Year 12.5M Future Year	Consideration of other UDX destinations as included in the 'Global Attractions Attendance Report' published by Themed Entertainment Association (TEA). ES (Volume 3) – Appendix 5.1 Transport Assessment - Para 4.13 and Table 4.2 (other UDX locations including Japan)	Likely	Low	M&M
5	Domestic/International Visitor splits	70%:30% for Primary Opening Year; 52%:48% for Future Year.	ES (Volume 3) – Appendix 5.1 Transport Assessment – Table 4-1 and Para 4.14 with comparison to Disneyland Paris	Likely Advised by UDX and sense checked against Disneyland Paris	Medium	M&M
6	Daily Number of Visitors – Primary Opening Year	Low – 10,000 (80 days) Average – 23,000 (230 days) Busy – 40,000 (40 days) Peak – 55,000 (15 days)	ES (Volume 3) – Appendix 5.1 Transport Assessment – Para 4.16 – 4.19 and Table 4.3	Likely Advised by UDX	Low	M&M
7	Daily Number of Visitors – Future Year	Low – 18,750 (50 days) Average – 31,250 (265 days) Busy – 60,417 (35 days) Peak – 81,250 (15 days)	ES (Volume 3) – Appendix 5.1 Transport Assessment – Para 4.16 – 4.19 and Table 4.3	Likely Advised by UDX	Medium	M&M
8	Daily Profile (Arrival / Departure) Theme Park	Arrival /Departure Profile based upon advice from UDX assumed typical Theme Park opening hours 0900-2100hrs	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note - Para 2.28 to 2.30 + Table 2.4 and Fig 2.1.)	Likely Advised by UDX and sense checked against Hollywood and Beijing Limited by Monitor and Manage	Medium	M&M

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
International Visitors Core Zone						
9	Forecast Visitors (Annual)	2.55M Opening Year 6M Future Year	ES (Volume 3) – Appendix 5.1 Transport Assessment Para 4.14 - 4.15 and Table 4-2 (other UDX locations including Japan)	Likely Advised by UDX	Medium	M&M
10	Mode Split into the UK	70% Air / 27% Train / 3% Car	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme [Appendix 6 – International Trip Assumptions - Fig 12.1.]	Professional judgement Used for the purpose of assessment	Low	M&M
11	Visitors by Air (70%) - UK Airport proportional splits	22.5% Gatwick 43.3% Heathrow 1.8% London City 9.3% Luton 16.7% Stanstead 6.4% Birmingham	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park [Appendix 6 – International Trip Assumptions – Para 12.3]. Proportion of total annual airport arrivals)	Professional judgement Based on size of airport and 2/3 of air arrival visitors stay overnight in nearby cities and 1/3 direct to resort	Low	M&M
12	Mode Split arrivals to the Site	50% Rail / 40% Coach / 5% Car / 5% taxi	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note [Appendix 6 – International Trip Assumptions – Fig 12.1]	Professional judgement	Low	M&M
13	Vehicle Occupancy	Car - 3.4 Taxi – 3.4 Coach – 50 Wixams – 65 per shuttle	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park - Para 3.10)	Likely Derived from observed effects calculation and vehicle size (see Vehicle Occupancy – Domestic)	Low	M&M

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
14	Daily Number of Visitors (Seasonality) – Opening Year	Low – 3,000 (80 days) Average – 6,900 (230 days) Busy – 12,000 (40 days) Peak – 16,500 (15 days)	ES (Volume 3) – Appendix 5.1 Transport Assessment Para 4.17 and Table 4-5	Likely Advised by UDX	Low	M&M
15	Daily Number of Visitors (Seasonality) – Future Year	Low – 9,000 (50 days) Average – 15,000 (265 days) Busy – 29,000 (35 days) Peak – 39,000 (15 days)	ES (Volume 3) – Appendix 5.1 Transport Assessment Para 4.17 and Table 4-5	Likely Advised by UDX	Medium	M&M
Domestic Visitors Core Zone						
16	Forecast Visitors (Annual)	5.95M Primary Opening Year 6.5M Future Year	ES (Volume 3) – Appendix 5.1 Transport Assessment Para 4.14, 4.15 and Table 4.2 (other UDX locations including Japan)	Likely Advised by UDX	Medium	M&M
17	Daily Number of Visitors (Seasonality) – Opening Year	Low – 7,000 (80 days) Average – 16,100 (230 days) Busy – 28,000 (40 days) Peak – 38,500 (15 days)	ES (Volume 3) – Appendix 5.1 Transport Assessment - Para 4.17 and Table 4-4	Likely Advised by UDX	Low	M&M
18	Daily Number of Visitors (Seasonality) – Future Year	Low – 9,750 (50 days) Average – 16,250 (265 days) Busy – 31,417 (35 days) Peak – 42,250 (15 days)	ES (Volume 3) – Appendix 5.1 Transport Assessment- Para 4.17 and Table 4-4	Likely Advised by UDX	Medium	M&M
19	Mode Split Arrivals to the Site (Primary Opening Year)	Car – 46% Rail – 28% Coach – 17% Taxi – 4% Shuttle (Hotels) – 4% Local Buses – 1%	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park - Para 2.49 and Table 2-17)	Likely Derived from Logit Model. Sense checked against Warner Bros. Studios, Leavesden 50% car	Low	M&M

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
19a	Mode Split Arrivals to the Site (Future Year)	Car – 59% Rail – 26% Coach – 12% Taxi – 1% Shuttle (Hotels) – 1% Local Buses – 1%	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park - Para 2.49 and Table 2-17)	Cautious worst case Derived from Logit Model. Assumes the relative operating cost of car travel reduces compared to other travel in the future therefore maximising travel by car.	Medium	M&M
20	Vehicle Occupancy	Car (Opening Yr) - 3.28-3.44 Car (Future Yr) – 3.31-3.57 Taxi – as car occupancy Coach – 50 Wixams – 65 per shuttle MK buses – 55 per shuttle Hotel buses – 30 per shuttle	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park - Para 2.52)	Likely Derived from Logit Model. Sense checked against Alton Towers (3.6 per car) and Thorpe Park (3.7 per car)	Low	M&M
Domestic Visitors Core Zone – Distribution and Mode Choice (Gravity Model & Logit Model)						
21	Gravity Model Zones	70 zones of origin across the UK with a finer breakdown (58 zones) covering the four regions in closest proximity to the Site	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park - Para 2.5)	N/A	N/A	N/A
22	Gravity Model	Single Origin Point for each Zone (main city or town/railway station) to calculate average driving journey times and Public Transport journey times	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park - Para 2.6)	N/A	Low	N/A
23	Domestic visitor demand for costing in the Gravity Model	10 visitor group types (for instance families or couples) identified with proportional split provided by UDX	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park - Table 2.1)	Likely Advised by UDX	Medium	M&M

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
24	Gravity Model Specification	<ul style="list-style-type: none"> -Single level mode choice -Fixed demands in each time period -Single destination applied -Distance parameter (α) of 1.1 	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park [Appendix 2 – Gravity Model Specification – Para 8.5 and Table 8.2]).	Professional judgement resulting in cautious worst case	Low	N/A
25	Logit Model Scenarios	Scenario 1 – 2023 Existing Scenario 3 – Reference Case Scenario 4 – Primary Opening Year Scenario 5 – Future Year Scenario 5a – Scenario 5 + EWR to Cambridge Scenario 5b – Scenario 5 with rail discount removed	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park – para 2.3)	N/A	N/A	N/A
26	Logit Model Zones	70 zones of origin across the UK with a finer breakdown (58 zones) covering the four regions in closest proximity to the Site	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park [Appendix 1 – Logit Model Specification – Para 7.2 – 7.3])	N/A	N/A	N/A
27	Logit Model – Average Journey Times for car driver and Public Transport	Transport travel times by time of day and day of week derived from Google Maps for the highways 2023 existing travel times and Trainline for rail 2023 travel times. Adjusted for Opening Year and Future Year for changes in traffic speed by region and road type based on DfT National Road Traffic Projections. Adjustments made to rail travel times to reflect Wixams Station and EWR scenarios.	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park [Appendix 1 – Logit Model Specification – Para 7.3])	Reasonable estimate based upon industry standard data	Low	N/A

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
28	Logit Model – Cost data for each zone (car/rail/coach)	<p>Rail costs applied by group size and based on fares from rail fares database by time of day and day of week.</p> <p>Weekday off-peak fares assumed for travel on a weekday with a sensitivity test assuming peak fares apply during peak periods.</p> <p>Generalised costs applied to car travel based on TAG operating costs</p> <p>Parking costs at £35/day assumed</p> <p>DfT TAG recommended Value of Time (VoT) for non-work other purposes.</p> <p>Coach Travel Generalised Time – in accordance with TAG with:</p> <ul style="list-style-type: none"> -Travel Time Factor 1.15 -Time Weighting Factor 2 applied to wait, walk and access times -Coach fare %age of Rail 67% 	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park [Appendix 1 – Logit Model Specification – Para 7.15 – 7.17])	<p>Professional judgement</p> <p>For the purpose of assessment based upon industry standard data in line with TAG conventions</p>	Medium (in respect of the parking charge)	M&M
29	Logit Model – Growth Factors	Growth applied to 2023 using DfT NRTP for Primary Opening Year and Future Year	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park [Appendix 1 – Logit Model Specification – Para 7.5 – 7.40])	<p>Professional judgement</p> <p>In line with DfT Common Analytical Scenario (CAS) appraisals</p>	Low	N/A

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
30	Logit Model – Travel	Travel is segmented by person/group type and by time of day/day of week	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex D: Trip Forecasting Note Theme Park [Appendix 1 – Logit Model Specification – Para 7.7])	Likely Advised by UDX	Medium	N/A
31	Logit Model equation to obtain probability of mode by each group type	Standard Logit Model equation with λ^M taken from DfT National Transport Model.	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park [Appendix 1 – Logit Model Specification – Para 7.20-7.21 and Table 7-4])	N/A	N/A	N/A
Team Members (TM) Core Zone						
32	Total Team Members	Primary Opening Year – 8,050 Future Year – 10,000 Team Members are the staff employed in the Core Zone.	ES (Volume 3) – Appendix 5.1 Transport Assessment - Para 4.20 & 4.21	Likely As advised by UDX	Low	M&M
33	Team Members on Peak Attendance Days – Primary Opening Year	Between 78-80% - 6,360 TMs – maximum on site on any one day Busy Day Team Members on site = 75% = 6083 Average Day Team Members on site = 70% = 5635	ES (Volume 3) – Appendix 5.1 Transport Assessment - Para 4.20	Likely As advised by UDX	Low	M&M
34	Team Members on Peak Attendance Days – Future Year	80% - 8,000 TMs – maximum on site on any one day Busy Day Team Members on site = 75% = 7500 Average Day Team Members on site = 70% = 7000	ES (Volume 3) – Appendix 5.1 Transport Assessment - Para 4.20	Likely As advised by UDX	Low	M&M

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
35	Shift Patterns for Team Members	<p>Based upon other UDX destinations, three shift patterns have been considered</p> <p>S1: Start 04:00-12:00 – Finish 10:00-18:00 (48%)</p> <p>S2: Start 09:00-17:00 – Finish 18:00-24:00 (42%)</p> <p>S3: Start 19:00-22:00 – Finish 05:00-08:00 (10%)</p> <p>Maximum Team Members per shift:</p> <p>Primary</p> <p>Opening Year S1=3053 S2=2671 S3=636</p> <p>Future Year S1=3840 S2=3360 S3=800</p>	ES (Volume 3) – Appendix 5.1 Transport Assessment - Para 4.20 and Table 4.6	<p>Likely</p> <p>As advised by UDX</p>	Low	M&M
Paramics Model (Microsimulation Modelling)						
36	Base/Observed Year	Surveys collected during March 2023	Level crossings on the Marston Vale Line (MVL) not operational during this period	N/A	N/A	N/A
37	Base/Observed - Model Extent	Covers the A421 from Black Cat interchange to M1 J13 – including each junction along A421. A6 around Kempston and Wixams. Local Routes through Kempston Hardwick, Stewartby and Wixams.		N/A	N/A	N/A

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
38	Base/Observed -Time Periods	<p>Duplicate models for a neutral weekday and Saturday</p> <p>Covers 07:00 to 22:00, this full period has been assessed.</p> <p>Covers commuter peak (08:00 to 09:00 and 17:00 to 18:00) plus 'development peak' (09:00 to 10:00 and 21:00 to 22:00).</p>	Includes an hour long warm up period (06:00 to 07:00). This is not assessed and is used only to ensure network is fully loaded at the start of the assessment period	N/A	N/A	N/A
39	Construction Scenarios	<p>Used the 2023 baseline.</p> <p>Considered peak construction traffic informed by trajectory</p>	Average construction traffic levels (between start of construction and opening of resort also considered)	Advised by UDX Construction Team	Low	N/A
40	Construction Scenario - Construction Traffic	<p>Cautious Worst Case considers construction traffic pertaining to the Proposed Development. This includes the new road connections/junctions and internal road network, as well as the separate construction of the East West Rail project and proposed on-site station, and Wixams station enhancements.</p> <p>Includes staff/TMs cars and HGVs separately</p>		Advised by UDX Construction Team	Low	Planning Condition
41	Construction Scenario - Construction Access	<p>2 points provided on Broadmead Road (either side of the rail line). Covers EWR station construction (as a cautious worst case)</p> <p>Wixams station – 4th arm added to B530/Manor Road junction. Remains a priority junction.</p> <p>OCEMP caps construction traffic to 500 HDV deliveries per day, and 3,035 pcus on Manor Road</p>	Broadmead Road Accesses – Most of the demand assigned to access to east of rail line. Worst Case this traffic has to cross the level crossing.	Advised by UDX Construction Team	High	Planning Condition

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
42	Construction Scenario - Woburn Road/Broadmead Road Junction	Temporary signalisation required to allow all additional demand out of Broadmead Road and prevent significant rat-running through Stewartby		Advised by UDX Construction Team	High	Planning Condition
43	Construction Scenario - Manor Road	Closed at rail line (MVL). Construction traffic can only route from the east (B530). No through traffic.		Advised by UDX Construction Team	Low	N/A
44	Construction Scenario - HGV Routeing	Proposed strategy applied. LGV/HGV traffic remains on the M1/A1/A421 for as long as possible, exiting the A421 via Marsh Leys or Elstow junction, depending on the internal access used, or typically does not route along local roads within Wixams, Stewartby or Marston Moretaine.		For the purpose of good traffic management and minimising environmental impact	High	Planning Condition
45	Construction Scenario - Construction Traffic Profile	Car traffic in peak periods (06:00 to 10:00 – with most around 07:00. 17:00 to 20:00 – majority at 17:00). HGV regular throughout the day 08:00 to 18:00.		As advised by UDX Construction Team	Medium	Planning Condition
46	Forecast Scenario (Reference Case) Period	Reference Case based on committed developments.	Background growth derived from Committed Development noting that this is greater than TEMPro derived growth to notionally the year 2030. Further growth outside of the Committed Development would be significantly more uncertain and did not match the test for inclusion in the model.	For the purpose of assessment	Low	N/A

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
47	Forecast Scenario (Reference Case) Highway Schemes	Capacity constraints on the edge of model have been removed in some scenarios		The mathematical assessment considers the effects of the demand forecasts on the bases that the National Highways separate investigation for Junction 13 results in a scheme that allows more traffic in peak periods to pass through the junction. It does this to maximise the ability of the demand forecasts and background traffic to reach the new A421 junction, and so to assess the new infrastructure associated with the Planning Proposal on that basis	Low	N/A
48	Forecast Scenario (Reference Case) Marston Vale Line (MVL) Level Crossings	Re-introduced in forecast and all development scenarios. Assumes 2 passing trains each hour. 'Barrier down' for 3 minutes		Professional judgement For the purpose of assessment	Low	N/A

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
49	Development Scenario - General	Cautious Worst Case. Future Year (20 years after opening). Tested in both weekday and Saturday models. 'Average' Weekday and 'Busy' Saturday.	Also tested a Primary Opening Year and various sensitivity scenarios. Logit model covered 'Low', 'Average', 'Busy' and 'Peak' attendance cases. 'Peak' Attendance does not apply to neutral day modelling as this will occur during holiday periods only	Narrative	N/A	N/A
50	Development Scenario – Profile of arrivals and departures	The Theme Park opens at 09:00hrs. Visitors start arriving from 07:00hrs). Theme Park closes at 21:00hrs and visitors continue to depart up to 22:00hrs. Hotel Arrivals occur later at 15:00hrs, coinciding with check in times.	ES (Volume 3) – Appendix 5.1 Transport Assessment – Annex 5 (Appendix D Fig 7.1)	Cautious worst case For the purpose of assessment, the assumed morning peak demand proportion is higher than what UDX advises happens at reasonable comparables (Hollywood and Beijing)	Medium	M&M
51	Development Scenario - Development Access	A421 Slip Roads Access. 2 large, connected roundabouts. To the west connects to southbound on and off-slips, Woburn Road and Broadmead Road. To the east connects northbound off-slip, Public Road A and West Gateway Zone. Manor Road dual-carriageway and realigned (Closed to west of rail line) Dual-carriageway Public Road A through Site Lake Zone Link Road with access on B530 and Manor Road	Primary Opening Year does not include Lake Zone link road	Narrative	N/A	Planning Condition

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
52	Development Scenario - East-West Rail	Between Oxford and Milton Keynes (MK) only. Buses from MK to the resort	ES (Volume 3) – Appendix 5.1 Transport Assessment - Section 6 para. 6.12	Likely A sensitivity test has included EWR extended to Cambridge and a new station at the resort	High (in respect of buses from MK)	Travel Plan (buses)
53	Development Scenario - Wixams Train Station	Upgraded to 4 platforms by NR. Shuttle bus access to be provided by UDX via 4 th arm to B530/Manor Road junction –Signalised		Likely Critical to the scheme	High	Planning Condition (station) and Travel Plan (shuttle bus)
54	Development Scenario - Team Member	Up to 10,000 in total, with 8,000 on site during peak days. Arrivals/Departures based on 3 likely shift patterns through the day		Likely Advised by UDX	Low	M&M
55	Development Scenario - Other Vehicles (Visitors)	Also considers taxis and coaches. Using separate access point.		Likely Advised by UDX	Low	M&M
56	Development Scenario - Other Vehicles (Servicing)	Consistent across all scenarios – 100 deliveries daily, regular through the day.		Likely Advised by UDX	Low	M&M
57	Development Scenario - Manor Road	Manor Road level crossing is closed and replaced by an all-vehicle bridge in accord with Network Rail's committed scheme. Sensitivity Test assumes closure of the level crossing and replacement with an Active Travel only bridge. This is the preferred option.	ES (Volume 3) – Appendix 5.1 Transport Assessment – Annex 5 Para 5.21 and 5.22.	All options are possible	Low	Planning Condition

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
58	Development Scenario - Broadmead Road/Woburn Road	Permanent signalisation of junction between Broadmead Road and Woburn Rd.		Likely Not strictly necessary but has benefits and was agreed with Parish Council	Low	Planning Condition
Highway Mitigation Design Assumptions (Embedded Mitigation)						
59	Proposed A421 Junction Location	The proposed A421 junction was located through an optioneering process which reviewed weaving length and potential routes into the Core Zone. The proposed location for this junction is outside the weaving length of the Marston Moretaine and Marsh Leys junctions. However, it is located within the weaving length for the lay-bys on the A421. Options were developed with how this could be resolved and the options in this location discussed with National Highways.	Highway Illustrative Arrangements / DMRB CD 122 4.1	Narrative	N/A	Planning Condition and Subsequent Highways Agreement
60	Proposed A421 Junction Slip Road Types	The proposed slip roads within the scheme are to be adopted by National Highways. We have reviewed the proposed slip road types based on the modelled traffic figures. These have currently been designed to the below layout types from CD 122: <ul style="list-style-type: none"> • Northbound A421 diverge is a grade separated 2-lane Layout B option 1 - ghost island diverge • Southbound A421 diverge is an at grade single lane Layout A option 1 - taper diverge • Southbound A421 merge is an at grade 2-lane Layout C - ghost island merge 	Highway Illustrative Arrangements / DMRB CD 122	Narrative	N/A	Planning Condition and Subsequent Highways Agreement

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
61	A421 Northbound Diverge Slip Road	Design shows a length of carriageway 742m from back of the diverge nose to be compliant with CD122 standards of a Slip Road. The design proposes a radius of 180m (2 steps-below) resulting in a relaxation as per CD109 70kph standards. However, CD122 Section 1.3 states relaxations prescribed by CD 109 shall not be applied to this document. Therefore, a departure from standard is required for horizontal alignment. There is a gradient of 5.62% from the start of the back of the diverge nose, and then a return gradient of -5.02% on the downhill segment into the West Gateway Zone. These values do not adhere to the CD109 Table 5.1 desirable minimum conditions whereby the maximum vertical gradient for all-purpose dual carriageways is 4%. A departure from standard is required for the vertical alignment. These has been reviewed by National Highways.	Highway Illustrative Arrangements / DMRB CD 122	Narrative	N/A	Planning Condition and Subsequent Highways Agreement
62	West Gateway, Core, Lake and East Gateway Zones Cross-section	The Bedford Borough Council website page for 'Highway Design Guides' states they have their own highway design guides, however these are currently being updated and should be read alongside national guidance contained in 'Manual for Streets' and the 'Design Manual for Roads and Bridges' and other guidance detailed. To allow for the review of internal proposed roadways an all-purpose urban dual carriageway cross-section to Figure 2.1N1g within the DMRB CD 127 has been used throughout. This has been reviewed with Bedford Borough Council.	Highway Illustrative Arrangements / DMRB CD 127 Figure 2.1N1g	Narrative	N/A	Planning Condition and Subsequent Highways Agreement

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
63	West Gateway, Core, Lake and East Gateway Zones Active Travel provision	A 5m proposed 2-way cycle lane and footway provision throughout the West Gateway, Core, Lake and East Gateway Zones has been proposed to meet the requirements of LTN 1/20. The active travel provisions within the scheme zones have been shown to Bedford Borough Council to reflect key destination and key links as described in the Transport Assessment	Highway Illustrative Arrangements / LTN 1/20 Transport Assessment	Narrative	N/A	Planning Condition and Subsequent Highways Agreement
64	West Gateway, Core, Lake and East Gateway Zones design speed	The proposed speed limit is 30mph throughout all of the proposed roadways in the West Gateway, Core, Lake and East Gateway Zones providing a design speed of 60B kph.	Highway Illustrative Arrangements / DMRB CD 109	Narrative	N/A	Planning Condition and Subsequent Highways Agreement
65	Signalisation of proposed junctions across scheme and West Gateway Roundabouts	We have reviewed the proposed junctions throughout the scheme based on the modelled traffic figures and road cross-sections proposed. Due to the dual carriageway cross-section, location and traffic numbers several of the junctions have been proposed to be signalised.	Highway Illustrative Arrangements / CD 123	Narrative	N/A	Planning Condition and Subsequent Highways Agreement
66	Severance of existing Manor Road	A review of existing Manor Road was undertaken to assess whether it could be upgraded to allow for the required cross-section and vehicle movements for the scheme. It was clear that due to the narrow carriageway width, small radii bends and proximity of residential and commercial properties to the road that upgrades to existing Manor Road would not be feasible. Therefore, a realignment of the road and severance of the elements where residential and commercial properties had direct access was proposed.	Highway Illustrative Arrangements	Narrative	N/A	Planning Condition and Subsequent Highways Agreement

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
67	Options related to the closure of Manor Road Level Crossing	<p>Network Rail have a TWAO and permission to develop a bridge over the Marston Vale Line to close the existing level crossing on Manor Road.</p> <p>The understanding is that the principal aim of NR is to close the crossing as a response to the EWR proposed delivery of EWR rail services on the MVL.</p> <p>The Transport Assessment assesses on this basis. It also assesses the effect of Option B which is to close the level crossing and deliver an Active Travel bridge. This is the preferred option.</p>	Highway Illustrative Arrangements	Narrative	N/A	Planning Condition and Subsequent Highways Agreement
68	A minimum headroom of 6.3m on bridges over rail lines	Through discussions with Network Rail they have specified a 6.3m headroom be implemented on all rail overbridges to ensure there is sufficient clearance for future electrification of their assets.	Highway Illustrative Arrangements	Narrative	N/A	N/A
69	Stage 1 Road Safety Audit	A Designers response to the RSA was provided to National Highways and Bedford Brough Council with all recommendations being accepted and incorporated into the design or to be implemented in the post-planning stage.	GG 119	Narrative	N/A	N/A
70	Enabling Works on Manor Road, Broadmead Road and signalisation on Woburn Road Junction	Construction phasing has been reviewed through the development of the scheme proposals. To gain access to the Core Zone construction traffic would need to be routed through Manor Road and Broadmead Road. The proposals for enabling works to support this proposal have been shown to Network Rail and Bedford Borough Council.	Highway Illustrative Arrangements	Narrative	N/A	Planning Conditions And Subsequent Highways Agreement



Universal Destinations & Experiences UK Project.

Summary of Agreed Position with The Department for Transport

May 2025



1. INTRODUCTION

1.1. Purpose of this Agreed Position Summary

- 1.1.1. This Agreed Position Summary ("APS") has been prepared by Universal Destinations and Experiences ("UDX") and the Department for Transport ("DfT") in representing their arms-length bodies and executive agencies including National Highways ("NH"), Network Rail ("NR") and East West Rail ("EWR") Company. For the purpose of this APS, UDX, DfT, NH, NR and EWR Company will jointly be referred to as "the Parties".
- 1.1.2. UDX is seeking planning permission for the construction and operation of a Universal Entertainment Resort Complex ("ERC"), and associated development, in Bedford. The 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.
- 1.1.3. 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 as well as the site of the planned Wixams rail station. The Site is located entirely within the Bedford Borough Council's administrative area. The Proposed Development is divided into four main land areas referred to as the Core Zone, Lake Zone, West Gateway Zone, and East Gateway Zone. The ERC within these zones comprises a theme park and related uses including retail, dining, entertainment, hotels and conference facilities and associated works including landscaping, drainage and ecology works, creation of internal roads and active travel routes, transport hubs for bus and coach access and car parking.
- 1.1.4. The planning proposal also includes a series of infrastructure improvements including:
- a new slip road to provide access to and from the A421;
 - an expanded railway station on the Thameslink/Midland Main Line at Wixams;
 - improvements to Manor Road; and
 - improvements to certain other local roads.
- 1.1.5. Overall, it is intended that this APS will be submitted alongside the planning proposal to give a clear position of the state and extent of agreement between the Parties as at the date on which this APS is signed. This APS does not preclude the right of any of the Parties from a full response as part of the consultation process.

2. MATTERS AGREED BETWEEN THE PARTIES

- 2.1.1. The Parties are AGREED on all matters, excluding those outlined in section 3 below, and in particular are AGREED on the following points:

2.2. DfT and National Highways

- 2.2.1. On behalf of DfT, National Highways is a beneficiary of the planning proposal. It has worked closely with UDX and other agencies of the DfT to develop an integrated and sustainable access and connectivity strategy for the Planning Proposal, leading to the development of proportionate solutions for road transport infrastructure that are appropriate and deliverable. It has supported the development of the transport assessment methodology and the assumptions used for the purpose of assessment. It has carefully considered the assessment and the results of the assessment in the context of the Planning Proposal.
- 2.2.2. The DfT, including National Highways, agrees that the assessment assumptions, including those summarised in Table 1, are reasonable and appropriate for the purpose of assessment. Given the unique nature of the Planning Proposal National Highways is cognisant of the inevitable limitations associated with the assumptions and the mathematical assessment. It is satisfied that in the round, and this context, that these are a reasonable basis on which to make professional judgements about effects and the importance of the effects.
- 2.2.3. In the course of the promotion and assessment of the planning proposal, a Logit Model, Gravity Model and a Microsimulation Model have been built and employed. National Highways has reviewed and supported the development of these models. It is satisfied that these models are suitable for the purpose of this assessment. The Logit Model is the basis for the transport demand forecasts by mode. The Gravity Model was developed to assess the distribution of transport demands to/from the ERC. The Microsimulation Model is a tool that informs professional judgements about the effect of the traffic demand forecasts on the road network.
- 2.2.4. National Highways is satisfied that the transport mitigation that forms part of the Planning Proposal is appropriate. It is satisfied that it adequately mitigates the effects of the Planning Proposal.
- 2.2.5. National Highways has worked with UDX to design a new junction on the A421. This junction is suitable, safe and deliverable within land contained within the highway boundary or within the control of the promoters of the Planning Proposal. It is satisfied that this new junction and other related and associated highways works proposed as part of the scheme will appropriately accommodate the likely demands for traffic movement. This includes an assessment of network performance (i.e. journey times, delay) and safety.
- 2.2.6. There will be residual effects on the highway network as a result of the Planning Proposal. The network will be busier in what are currently off-peak periods. This will be noticeable at times. It will also be busier in what are currently weekday peak periods. It is unlikely that any effects at this time will be greater than marginal in the context of planning policy.
- 2.2.7. The A421 will experience an increase in traffic demand as a result of the Planning Proposal. National Highways is satisfied with the professional judgement that this can be reasonably accommodated by the A421 and the new infrastructure associated with the Planning Proposal. It is satisfied that the Planning Proposal will not cause a significant adverse effect on the strategic road network, including the A421, in the context of planning policy. National Highways are considering further improvements to the A421 as part of its future strategic planning for the SRN, this may lead to further enhancements to M1 J13 and A421/A6 Bedford junctions, these are unrelated to the Planning Proposals.



- 2.2.8. In making these judgements, National Highways has assumed completion of the A428 Black Cat to Caxton Gibbet highway improvements before 2031, the Opening Year of the planning proposal.
- 2.2.9. National Highways will take on responsibility for the delivery of the connection between the A421 and the access roads into the Site. It is satisfied that it can deliver this connection by 31st December 2030 or two months ahead of the park opening, whichever is the latter. This is subject to funding being confirmed, necessary statutory approvals, including environmental assessments and highway orders, being obtained in accordance with applicable planning and highways legislation. These delivery timelines may be subject to reasonable extension in the event of unforeseen circumstances beyond the control of National Highways.
- 2.2.10. National Highways agrees with the professional judgements and conclusions set out in Table 1. It is satisfied that the Planning Proposal has been properly assessed, and that the effects are within reasonable bounds and that it is deliverable.

2.3. DfT and Network Rail

- 2.3.1. Network Rail is a beneficiary of the Planning Proposal. The DfT's rail team has worked with the promoter team to develop a solution for rail connectivity to the Midland Main Line. The Midland Main Line accommodates Thameslink trains between Brighton and Bedford via London, and East Midlands Railway (EMR) trains from London St Pancras to the Midlands, including Corby, Nottingham and Sheffield.
- 2.3.2. The planning proposal includes a railway station at Wixams.
- 2.3.3. There is a current proposal for a two-platform station at Wixams to serve the Wixams new settlement. This proposal includes platforms on the 'slow' lines. It will be sufficient for stopping trains on the Thameslink service for parts of the week, but not all of the week. It will not enable EMR trains to stop at Wixams. This design does not have a sufficient level of service to accommodate the required level of service plus the demands of the Planning Proposal.
- 2.3.4. Therefore, the Planning Proposal includes a larger station at Wixams. The larger station includes four platforms serving all four railway lines. This enables trains to stop at all times during the week, and enables the EMR trains, as well as Thameslink trains, to stop at Wixams. It includes a new 'western plaza' which provides shuttle services between the station and the remainder of the planning proposal. The platforms and associated station infrastructure are deliverable and can appropriately accommodate the demand forecasts. The DfT, via Network Rail, will take responsibility for delivery of the four-platform station and associated rail infrastructure. This can be completed by 31st December 2030 or two months ahead of the park opening, whichever is the later.
- 2.3.5. Assessments of train capacities and station capacities have been undertaken by DfT to inform professional judgements about effect on the Midland Main Line, and the adequacy of Wixams station. DfT is satisfied that there is sufficient capacity on the MML to meet forecast demand on this line and at Wixams station.
- 2.3.6. On the Midland Main Line, the DfT is satisfied that the demand forecasts can be accommodated by the Thameslink network only. The opportunity to use the EMR network in addition to the Thameslink network provides for an increased level of service and flexibility.
- 2.3.7. In making these professional judgements, the DfT assumes that there will be ongoing and active liaison between the promoter, the DfT and the transport operators once the Planning Proposal becomes operational. It assumes that the promoter and the transport operators will work together, anticipating



evolutions in demand or changes from the norm, and taking action accordingly. UDX advises that active and constant management of its operation is a normal part of its business. The Planning Proposal commits to connecting that day to day management of travel planning with regular and meaningful liaison with the transport operators.

- 2.3.8. The DfT understands that UDX have considered the effects on level crossings. There are separate plans as part of Connection Stage 2 of East West Rail, unrelated to the Planning Proposal, for the Manor Road level crossing to be replaced with an overbridge carrying vehicles and active travel users. In this scenario the existing level crossing would be closed (subject to separate planning conditions). The Planning Proposal provides the opportunity for traffic that would have used the new overbridge to route through the Planning Proposal site, and for the overbridge to be redesigned as an active travel corridor only. This is the Preferred Option and that which forms part of the Planning Proposal.
- 2.3.9. The DfT has seen analysis from UDX that they have considered the effect of the Planning Proposal on the Broadmead Road level crossing. It is satisfied that, subject to the following improvements being made at this crossing, that the effects of the Planning Proposal at this crossing are acceptable. UDX has included the following improvements within the Planning Proposal:
- Provision of a Banksman during construction on the approaches to the level crossing,
 - Red Light Safety Equipment (Home Office Approved),
 - Vehicle Activated Lights showing level crossing ahead, and
 - Count Down Marker on the downside approach of the level crossing due to the curve on the road to mitigate such high upsurge in risk.
- 2.3.10. The visitor movement to and from the Site is largely in the opposite direction to the current peak movement on the Midland Main Line. The visitors to the planning proposal will predominantly occupy space on trains that are currently running at low occupancy on the Midland Main Line. This increased occupancy will improve the rail network's carbon characteristics, will minimise the environmental impacts of the project and contribute to the UK's environmental sustainability objectives.

2.4. DfT and EWR Company

- 2.4.1. EWR Company is a potential beneficiary of the Planning Proposal via the provision of safeguarded land.
- 2.4.2. Connection Stage 1 of EWR will create a direct rail service from Oxford to Bletchley and Milton Keynes and is due to enter into service shortly. Connection Stage 2 will bring forward services between Oxford and Bedford from 2030 and Connection Stage 3 will provide the full Oxford to Cambridge service.
- 2.4.3. The Planning Proposal safeguards land for a potential new station on the EWR line between Bletchley and Bedford in the vicinity of Stewartby. Stations and services on the line between Bletchley and Bedford are subject to further consultation by East West Rail Company.
- 2.4.4. The promoter and EWR Company commit to continued collaboration to explore opportunities presented by the proposal without precluding future optionality for EWR Company or prejudicing future EWR consultations.

MATTERS YET TO BE AGREED BETWEEN THE PARTIES

The Parties confirm that the following areas are TO BE AGREED by the Parties:

None, but note this agreement is without prejudice to any further comment from the Parties

APS is prepared jointly and agreed by the parties.

Signed by: [REDACTED] Senior Vice President, Public Affairs For and on behalf of UDX	[REDACTED]
Date	15 May 2025

Signed by: [REDACTED] Director, Roads Strategy and SRO, P320 For and on behalf of the Department for Transport	[REDACTED]
Date	15 May 2025

Table 1

Table 1 – Summary of Assumptions – Transport

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
Entertainment Resort Complex (ERC)						
1	Proposed Development (Core Zone)	Theme Park (TP) Entertainment Resort Complex Support Entry Plaza (EP) TP & EP car park and coach park Hotel (500 bedrooms) Valet Parking service area Transport Hub Team Member Car Park	ES Chapter 2: Description of Proposed Development (Volume 1) and ES Part 4 – Appendix 5.1-Transport Assessment – para 4.9	Likely	N/A	M&M
2	Proposed Development (Lake Zone)	Business Hotels (2000 bedrooms) Hotels/Accommodation (3370 bedrooms) Entertainment Resort Complex Support Only applies to Future Year – not built in Primary Opening Year - 1724 Staff (additional to Core Zone Team Members) Guests are linked to Core Zone visitors or Convention Centre visitors	ES Chapter 2: Description of Proposed Development (Volume 1) and ES (Part 4) – Appendix 5.1-Transport Assessment – para 4.9 and para 4.31	Used for purpose of assessment. Except for a proportion of the business hotel rooms that are associated with the convention centre (see below) all are largely related to activities in Core Zone.	Low	M&M

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
2a	Convention Centre (Lake Zone)	<p>Convention Centre (gross internal area (GIA) 55,000sqm)</p> <p>Only applies to Future Year – not built in Primary Opening Year</p> <p>– Standalone / Not related to Core Zone activity only for the purpose of trip generation in the Transport Assessment</p> <p>- 200 Staff (additional to Core Zone Team Members)</p>	ES (Volume 3) – Appendix 5.1-Transport Assessment – para 4.31b	<p>Cautious worst case</p> <p>Used for purpose of assessment. (assessment assumes a 3000 delegate event every day but in reality not all days will host events)</p>	Low	M&M

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
3	Proposed Development (West Gateway Zone)	<p>Highway Service Area (16 pumps) Restaurants (up to 5,866 sq.m) Hotel (200 bedroom) Entertainment Resort Complex Support</p> <p>Only applies to Future Year – not built in Primary Opening Year</p> <p>Only applies to Future Year – not built in Primary Opening Year</p> <ul style="list-style-type: none"> - Demands assessed using traditional methods based retail type and floorspace. - 75% of restaurant customers linked to Core Zone Visitors (25% additional to Core Zone) - 50% of a.m. and 75% of p.m. Highway Service Area customers linked to Core Zone Visitors. Remainder are additional to Core Zone) - 75% of Hotel guests linked to Core Zone Visitors (25% additional to Core Zone) 	ES (Volume 1) - Chapter 2: Description of Proposed Development and ES (Volume 3) – Appendix 5.1 Transport Assessment – para 4.9	<p>Representative in terms of trips</p> <p>Used for purpose of assessment. Largely related to activities in Core Zone.</p>	Low	M&M
Total Visitors Core Zone						

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
4	Total Annual Visitors to Core Zone	8.5M Primary Opening Year 12.5M Future Year	Consideration of other UDX destinations as included in the 'Global Attractions Attendance Report' published by Themed Entertainment Association (TEA). ES (Volume 3) – Appendix 5.1 Transport Assessment - Para 4.13 and Table 4.2 (other UDX locations including Japan)	Likely	Low	M&M
5	Domestic/International Visitor splits	70%:30% for Primary Opening Year; 52%:48% for Future Year.	ES (Volume 3) – Appendix 5.1 Transport Assessment – Table 4-1 and Para 4.14 with comparison to Disneyland Paris	Likely Advised by UDX and sense checked against Disneyland Paris	Medium	M&M
6	Daily Number of Visitors – Primary Opening Year	Low – 10,000 (80 days) Average – 23,000 (230 days) Busy – 40,000 (40 days) Peak – 55,000 (15 days)	ES (Volume 3) – Appendix 5.1 Transport Assessment – Para 4.16 – 4.19 and Table 4.3	Likely Advised by UDX	Low	M&M
7	Daily Number of Visitors – Future Year	Low – 18,750 (50 days) Average – 31,250 (265 days) Busy – 60,417 (35 days) Peak – 81,250 (15 days)	ES (Volume 3) – Appendix 5.1 Transport Assessment – Para 4.16 – 4.19 and Table 4.3	Likely Advised by UDX	Medium	M&M
8	Daily Profile (Arrival / Departure) Theme Park	Arrival /Departure Profile based upon advice from UDX assumed typical Theme Park opening hours 0900-2100hrs	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note - Para 2.28 to 2.30 + Table 2.4 and Fig 2.1.)	Likely Advised by UDX and sense checked against Hollywood and Beijing Limited by Monitor and Manage	Medium	M&M

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
International Visitors Core Zone						
9	Forecast Visitors (Annual)	2.55M Opening Year 6M Future Year	ES (Volume 3) – Appendix 5.1 Transport Assessment Para 4.14 - 4.15 and Table 4-2 (other UDX locations including Japan)	Likely Advised by UDX	Medium	M&M
10	Mode Split into the UK	70% Air / 27% Train / 3% Car	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme [Appendix 6 – International Trip Assumptions - Fig 12.1.]	Professional judgement Used for the purpose of assessment	Low	M&M
11	Visitors by Air (70%) - UK Airport proportional splits	22.5% Gatwick 43.3% Heathrow 1.8% London City 9.3% Luton 16.7% Stanstead 6.4% Birmingham	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park [Appendix 6 – International Trip Assumptions – Para 12.3]. Proportion of total annual airport arrivals)	Professional judgement Based on size of airport and 2/3 of air arrival visitors stay overnight in nearby cities and 1/3 direct to resort	Low	M&M
12	Mode Split arrivals to the Site	50% Rail / 40% Coach / 5% Car / 5% taxi	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note [Appendix 6 – International Trip Assumptions – Fig 12.1]	Professional judgement	Low	M&M
13	Vehicle Occupancy	Car - 3.4 Taxi – 3.4 Coach – 50 Wixams – 65 per shuttle	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park - Para 3.10)	Likely Derived from observed effects calculation and vehicle size (see Vehicle Occupancy – Domestic)	Low	M&M

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
14	Daily Number of Visitors (Seasonality) – Opening Year	Low – 3,000 (80 days) Average – 6,900 (230 days) Busy – 12,000 (40 days) Peak – 16,500 (15 days)	ES (Volume 3) – Appendix 5.1 Transport Assessment Para 4.17 and Table 4-5	Likely Advised by UDX	Low	M&M
15	Daily Number of Visitors (Seasonality) – Future Year	Low – 9,000 (50 days) Average – 15,000 (265 days) Busy – 29,000 (35 days) Peak – 39,000 (15 days)	ES (Volume 3) – Appendix 5.1 Transport Assessment Para 4.17 and Table 4-5	Likely Advised by UDX	Medium	M&M
Domestic Visitors Core Zone						
16	Forecast Visitors (Annual)	5.95M Primary Opening Year 6.5M Future Year	ES (Volume 3) – Appendix 5.1 Transport Assessment Para 4.14, 4.15 and Table 4.2 (other UDX locations including Japan)	Likely Advised by UDX	Medium	M&M
17	Daily Number of Visitors (Seasonality) – Opening Year	Low – 7,000 (80 days) Average – 16,100 (230 days) Busy – 28,000 (40 days) Peak – 38,500 (15 days)	ES (Volume 3) – Appendix 5.1 Transport Assessment - Para 4.17 and Table 4-4	Likely Advised by UDX	Low	M&M
18	Daily Number of Visitors (Seasonality) – Future Year	Low – 9,750 (50 days) Average – 16,250 (265 days) Busy – 31,417 (35 days) Peak – 42,250 (15 days)	ES (Volume 3) – Appendix 5.1 Transport Assessment- Para 4.17 and Table 4-4	Likely Advised by UDX	Medium	M&M
19	Mode Split Arrivals to the Site (Primary Opening Year)	Car – 46% Rail – 28% Coach – 17% Taxi – 4% Shuttle (Hotels) – 4% Local Buses – 1%	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park - Para 2.49 and Table 2-17)	Likely Derived from Logit Model. Sense checked against Warner Bros. Studios, Leavesden 50% car	Low	M&M

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
19a	Mode Split Arrivals to the Site (Future Year)	Car – 59% Rail – 26% Coach – 12% Taxi – 1% Shuttle (Hotels) – 1% Local Buses – 1%	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park - Para 2.49 and Table 2-17)	Cautious worst case Derived from Logit Model. Assumes the relative operating cost of car travel reduces compared to other travel in the future therefore maximising travel by car.	Medium	M&M
20	Vehicle Occupancy	Car (Opening Yr) - 3.28-3.44 Car (Future Yr) – 3.31-3.57 Taxi – as car occupancy Coach – 50 Wixams – 65 per shuttle MK buses – 55 per shuttle Hotel buses – 30 per shuttle	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park - Para 2.52)	Likely Derived from Logit Model. Sense checked against Alton Towers (3.6 per car) and Thorpe Park (3.7 per car)	Low	M&M
Domestic Visitors Core Zone – Distribution and Mode Choice (Gravity Model & Logit Model)						
21	Gravity Model Zones	70 zones of origin across the UK with a finer breakdown (58 zones) covering the four regions in closest proximity to the Site	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park - Para 2.5)	N/A	N/A	N/A
22	Gravity Model	Single Origin Point for each Zone (main city or town/railway station) to calculate average driving journey times and Public Transport journey times	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park - Para 2.6)	N/A	Low	N/A
23	Domestic visitor demand for costing in the Gravity Model	10 visitor group types (for instance families or couples) identified with proportional split provided by UDX	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park - Table 2.1)	Likely Advised by UDX	Medium	M&M

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
24	Gravity Model Specification	<ul style="list-style-type: none"> -Single level mode choice -Fixed demands in each time period -Single destination applied -Distance parameter (α) of 1.1 	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park [Appendix 2 – Gravity Model Specification – Para 8.5 and Table 8.2]).	Professional judgement resulting in cautious worst case	Low	N/A
25	Logit Model Scenarios	Scenario 1 – 2023 Existing Scenario 3 – Reference Case Scenario 4 – Primary Opening Year Scenario 5 – Future Year Scenario 5a – Scenario 5 + EWR to Cambridge Scenario 5b – Scenario 5 with rail discount removed	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park – para 2.3)	N/A	N/A	N/A
26	Logit Model Zones	70 zones of origin across the UK with a finer breakdown (58 zones) covering the four regions in closest proximity to the Site	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park [Appendix 1 – Logit Model Specification – Para 7.2 – 7.3])	N/A	N/A	N/A
27	Logit Model – Average Journey Times for car driver and Public Transport	Transport travel times by time of day and day of week derived from Google Maps for the highways 2023 existing travel times and Trainline for rail 2023 travel times. Adjusted for Opening Year and Future Year for changes in traffic speed by region and road type based on DfT National Road Traffic Projections. Adjustments made to rail travel times to reflect Wixams Station and EWR scenarios.	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park [Appendix 1 – Logit Model Specification – Para 7.3])	Reasonable estimate based upon industry standard data	Low	N/A

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
28	Logit Model – Cost data for each zone (car/rail/coach)	<p>Rail costs applied by group size and based on fares from rail fares database by time of day and day of week.</p> <p>Weekday off-peak fares assumed for travel on a weekday with a sensitivity test assuming peak fares apply during peak periods.</p> <p>Generalised costs applied to car travel based on TAG operating costs</p> <p>Parking costs at £35/day assumed</p> <p>DfT TAG recommended Value of Time (VoT) for non-work other purposes.</p> <p>Coach Travel Generalised Time – in accordance with TAG with:</p> <ul style="list-style-type: none"> -Travel Time Factor 1.15 -Time Weighting Factor 2 applied to wait, walk and access times -Coach fare %age of Rail 67% 	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park [Appendix 1 – Logit Model Specification – Para 7.15 – 7.17])	<p>Professional judgement</p> <p>For the purpose of assessment based upon industry standard data in line with TAG conventions</p>	Medium (in respect of the parking charge)	M&M
29	Logit Model – Growth Factors	Growth applied to 2023 using DfT NRTP for Primary Opening Year and Future Year	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park [Appendix 1 – Logit Model Specification – Para 7.5 – 7.40])	<p>Professional judgement</p> <p>In line with DfT Common Analytical Scenario (CAS) appraisals</p>	Low	N/A

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
30	Logit Model – Travel	Travel is segmented by person/group type and by time of day/day of week	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex D: Trip Forecasting Note Theme Park [Appendix 1 – Logit Model Specification – Para 7.7])	Likely Advised by UDX	Medium	N/A
31	Logit Model equation to obtain probability of mode by each group type	Standard Logit Model equation with λ^M taken from DfT National Transport Model.	ES (Volume 3) – Appendix 5.1 Transport Assessment (Annex 4: Trip Forecasting Note Theme Park [Appendix 1 – Logit Model Specification – Para 7.20-7.21 and Table 7-4])	N/A	N/A	N/A
Team Members (TM) Core Zone						
32	Total Team Members	Primary Opening Year – 8,050 Future Year – 10,000 Team Members are the staff employed in the Core Zone.	ES (Volume 3) – Appendix 5.1 Transport Assessment - Para 4.20 & 4.21	Likely As advised by UDX	Low	M&M
33	Team Members on Peak Attendance Days – Primary Opening Year	Between 78-80% - 6,360 TMs – maximum on site on any one day Busy Day Team Members on site = 75% = 6083 Average Day Team Members on site = 70% = 5635	ES (Volume 3) – Appendix 5.1 Transport Assessment - Para 4.20	Likely As advised by UDX	Low	M&M
34	Team Members on Peak Attendance Days – Future Year	80% - 8,000 TMs – maximum on site on any one day Busy Day Team Members on site = 75% = 7500 Average Day Team Members on site = 70% = 7000	ES (Volume 3) – Appendix 5.1 Transport Assessment - Para 4.20	Likely As advised by UDX	Low	M&M

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
35	Shift Patterns for Team Members	<p>Based upon other UDX destinations, three shift patterns have been considered</p> <p>S1: Start 04:00-12:00 – Finish 10:00-18:00 (48%)</p> <p>S2: Start 09:00-17:00 – Finish 18:00-24:00 (42%)</p> <p>S3: Start 19:00-22:00 – Finish 05:00-08:00 (10%)</p> <p>Maximum Team Members per shift:</p> <p>Primary</p> <p>Opening Year S1=3053 S2=2671 S3=636</p> <p>Future Year S1=3840 S2=3360 S3=800</p>	ES (Volume 3) – Appendix 5.1 Transport Assessment - Para 4.20 and Table 4.6	<p>Likely</p> <p>As advised by UDX</p>	Low	M&M
Paramics Model (Microsimulation Modelling)						
36	Base/Observed Year	Surveys collected during March 2023	Level crossings on the Marston Vale Line (MVL) not operational during this period	N/A	N/A	N/A
37	Base/Observed - Model Extent	Covers the A421 from Black Cat interchange to M1 J13 – including each junction along A421. A6 around Kempston and Wixams. Local Routes through Kempston Hardwick, Stewartby and Wixams.		N/A	N/A	N/A

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
38	Base/Observed -Time Periods	<p>Duplicate models for a neutral weekday and Saturday</p> <p>Covers 07:00 to 22:00, this full period has been assessed.</p> <p>Covers commuter peak (08:00 to 09:00 and 17:00 to 18:00) plus 'development peak' (09:00 to 10:00 and 21:00 to 22:00).</p>	Includes an hour long warm up period (06:00 to 07:00). This is not assessed and is used only to ensure network is fully loaded at the start of the assessment period	N/A	N/A	N/A
39	Construction Scenarios	<p>Used the 2023 baseline.</p> <p>Considered peak construction traffic informed by trajectory</p>	Average construction traffic levels (between start of construction and opening of resort also considered)	Advised by UDX Construction Team	Low	N/A
40	Construction Scenario - Construction Traffic	<p>Cautious Worst Case considers construction traffic pertaining to the Proposed Development. This includes the new road connections/junctions and internal road network, as well as the separate construction of the East West Rail project and proposed on-site station, and Wixams station enhancements.</p> <p>Includes staff/TMs cars and HGVs separately</p>		Advised by UDX Construction Team	Low	Planning Condition
41	Construction Scenario - Construction Access	<p>2 points provided on Broadmead Road (either side of the rail line). Covers EWR station construction (as a cautious worst case)</p> <p>Wixams station – 4th arm added to B530/Manor Road junction. Remains a priority junction.</p> <p>OCEMP caps construction traffic to 500 HDV deliveries per day, and 3,035 pcus on Manor Road</p>	Broadmead Road Accesses – Most of the demand assigned to access to east of rail line. Worst Case this traffic has to cross the level crossing.	Advised by UDX Construction Team	High	Planning Condition

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
42	Construction Scenario - Woburn Road/Broadmead Road Junction	Temporary signalisation required to allow all additional demand out of Broadmead Road and prevent significant rat-running through Stewartby		Advised by UDX Construction Team	High	Planning Condition
43	Construction Scenario - Manor Road	Closed at rail line (MVL). Construction traffic can only route from the east (B530). No through traffic.		Advised by UDX Construction Team	Low	N/A
44	Construction Scenario - HGV Routeing	Proposed strategy applied. LGV/HGV traffic remains on the M1/A1/A421 for as long as possible, exiting the A421 via Marsh Leys or Elstow junction, depending on the internal access used, or typically does not route along local roads within Wixams, Stewartby or Marston Moretaine.		For the purpose of good traffic management and minimising environmental impact	High	Planning Condition
45	Construction Scenario - Construction Traffic Profile	Car traffic in peak periods (06:00 to 10:00 – with most around 07:00. 17:00 to 20:00 – majority at 17:00). HGV regular throughout the day 08:00 to 18:00.		As advised by UDX Construction Team	Medium	Planning Condition
46	Forecast Scenario (Reference Case) Period	Reference Case based on committed developments.	Background growth derived from Committed Development noting that this is greater than TEMPro derived growth to notionally the year 2030. Further growth outside of the Committed Development would be significantly more uncertain and did not match the test for inclusion in the model.	For the purpose of assessment	Low	N/A

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
47	Forecast Scenario (Reference Case) Highway Schemes	Capacity constraints on the edge of model have been removed in some scenarios		The mathematical assessment considers the effects of the demand forecasts on the bases that the National Highways separate investigation for Junction 13 results in a scheme that allows more traffic in peak periods to pass through the junction. It does this to maximise the ability of the demand forecasts and background traffic to reach the new A421 junction, and so to assess the new infrastructure associated with the Planning Proposal on that basis	Low	N/A
48	Forecast Scenario (Reference Case) Marston Vale Line (MVL) Level Crossings	Re-introduced in forecast and all development scenarios. Assumes 2 passing trains each hour. 'Barrier down' for 3 minutes		Professional judgement For the purpose of assessment	Low	N/A

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
49	Development Scenario - General	Cautious Worst Case. Future Year (20 years after opening). Tested in both weekday and Saturday models. 'Average' Weekday and 'Busy' Saturday.	Also tested a Primary Opening Year and various sensitivity scenarios. Logit model covered 'Low', 'Average', 'Busy' and 'Peak' attendance cases. 'Peak' Attendance does not apply to neutral day modelling as this will occur during holiday periods only	Narrative	N/A	N/A
50	Development Scenario – Profile of arrivals and departures	The Theme Park opens at 09:00hrs. Visitors start arriving from 07:00hrs). Theme Park closes at 21:00hrs and visitors continue to depart up to 22:00hrs. Hotel Arrivals occur later at 15:00hrs, coinciding with check in times.	ES (Volume 3) – Appendix 5.1 Transport Assessment – Annex 5 (Appendix D Fig 7.1)	Cautious worst case For the purpose of assessment, the assumed morning peak demand proportion is higher than what UDX advises happens at reasonable comparables (Hollywood and Beijing)	Medium	M&M
51	Development Scenario - Development Access	A421 Slip Roads Access. 2 large, connected roundabouts. To the west connects to southbound on and off-slips, Woburn Road and Broadmead Road. To the east connects northbound off-slip, Public Road A and West Gateway Zone. Manor Road dual-carriageway and realigned (Closed to west of rail line) Dual-carriageway Public Road A through Site Lake Zone Link Road with access on B530 and Manor Road	Primary Opening Year does not include Lake Zone link road	Narrative	N/A	Planning Condition

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
52	Development Scenario - East-West Rail	Between Oxford and Milton Keynes (MK) only. Buses from MK to the resort	ES (Volume 3) – Appendix 5.1 Transport Assessment - Section 6 para. 6.12	Likely A sensitivity test has included EWR extended to Cambridge and a new station at the resort	High (in respect of buses from MK)	Travel Plan (buses)
53	Development Scenario - Wixams Train Station	Upgraded to 4 platforms by NR. Shuttle bus access to be provided by UDX via 4 th arm to B530/Manor Road junction –Signalised		Likely Critical to the scheme	High	Planning Condition (station) and Travel Plan (shuttle bus)
54	Development Scenario - Team Member	Up to 10,000 in total, with 8,000 on site during peak days. Arrivals/Departures based on 3 likely shift patterns through the day		Likely Advised by UDX	Low	M&M
55	Development Scenario - Other Vehicles (Visitors)	Also considers taxis and coaches. Using separate access point.		Likely Advised by UDX	Low	M&M
56	Development Scenario - Other Vehicles (Servicing)	Consistent across all scenarios – 100 deliveries daily, regular through the day.		Likely Advised by UDX	Low	M&M
57	Development Scenario - Manor Road	Manor Road level crossing is closed and replaced by an all-vehicle bridge in accord with Network Rail's committed scheme. Sensitivity Test assumes closure of the level crossing and replacement with an Active Travel only bridge. This is the preferred option.	ES (Volume 3) – Appendix 5.1 Transport Assessment – Annex 5 Para 5.21 and 5.22.	All options are possible	Low	Planning Condition

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
58	Development Scenario - Broadmead Road/Woburn Road	Permanent signalisation of junction between Broadmead Road and Woburn Rd.		Likely Not strictly necessary but has benefits and was agreed with Parish Council	Low	Planning Condition
Highway Mitigation Design Assumptions (Embedded Mitigation)						
59	Proposed A421 Junction Location	The proposed A421 junction was located through an optioneering process which reviewed weaving length and potential routes into the Core Zone. The proposed location for this junction is outside the weaving length of the Marston Moretaine and Marsh Leys junctions. However, it is located within the weaving length for the lay-bys on the A421. Options were developed with how this could be resolved and the options in this location discussed with National Highways.	Highway Illustrative Arrangements / DMRB CD 122 4.1	Narrative	N/A	Planning Condition and Subsequent Highways Agreement
60	Proposed A421 Junction Slip Road Types	The proposed slip roads within the scheme are to be adopted by National Highways. We have reviewed the proposed slip road types based on the modelled traffic figures. These have currently been designed to the below layout types from CD 122: <ul style="list-style-type: none"> • Northbound A421 diverge is a grade separated 2-lane Layout B option 1 - ghost island diverge • Southbound A421 diverge is an at grade single lane Layout A option 1 - taper diverge • Southbound A421 merge is an at grade 2-lane Layout C - ghost island merge 	Highway Illustrative Arrangements / DMRB CD 122	Narrative	N/A	Planning Condition and Subsequent Highways Agreement

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
61	A421 Northbound Diverge Slip Road	Design shows a length of carriageway 742m from back of the diverge nose to be compliant with CD122 standards of a Slip Road. The design proposes a radius of 180m (2 steps-below) resulting in a relaxation as per CD109 70kph standards. However, CD122 Section 1.3 states relaxations prescribed by CD 109 shall not be applied to this document. Therefore, a departure from standard is required for horizontal alignment. There is a gradient of 5.62% from the start of the back of the diverge nose, and then a return gradient of -5.02% on the downhill segment into the West Gateway Zone. These values do not adhere to the CD109 Table 5.1 desirable minimum conditions whereby the maximum vertical gradient for all-purpose dual carriageways is 4%. A departure from standard is required for the vertical alignment. These has been reviewed by National Highways.	Highway Illustrative Arrangements / DMRB CD 122	Narrative	N/A	Planning Condition and Subsequent Highways Agreement
62	West Gateway, Core, Lake and East Gateway Zones Cross-section	The Bedford Borough Council website page for 'Highway Design Guides' states they have their own highway design guides, however these are currently being updated and should be read alongside national guidance contained in 'Manual for Streets' and the 'Design Manual for Roads and Bridges' and other guidance detailed. To allow for the review of internal proposed roadways an all-purpose urban dual carriageway cross-section to Figure 2.1N1g within the DMRB CD 127 has been used throughout. This has been reviewed with Bedford Borough Council.	Highway Illustrative Arrangements / DMRB CD 127 Figure 2.1N1g	Narrative	N/A	Planning Condition and Subsequent Highways Agreement

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
63	West Gateway, Core, Lake and East Gateway Zones Active Travel provision	A 5m proposed 2-way cycle lane and footway provision throughout the West Gateway, Core, Lake and East Gateway Zones has been proposed to meet the requirements of LTN 1/20. The active travel provisions within the scheme zones have been shown to Bedford Borough Council to reflect key destination and key links as described in the Transport Assessment	Highway Illustrative Arrangements / LTN 1/20 Transport Assessment	Narrative	N/A	Planning Condition and Subsequent Highways Agreement
64	West Gateway, Core, Lake and East Gateway Zones design speed	The proposed speed limit is 30mph throughout all of the proposed roadways in the West Gateway, Core, Lake and East Gateway Zones providing a design speed of 60B kph.	Highway Illustrative Arrangements / DMRB CD 109	Narrative	N/A	Planning Condition and Subsequent Highways Agreement
65	Signalisation of proposed junctions across scheme and West Gateway Roundabouts	We have reviewed the proposed junctions throughout the scheme based on the modelled traffic figures and road cross-sections proposed. Due to the dual carriageway cross-section, location and traffic numbers several of the junctions have been proposed to be signalised.	Highway Illustrative Arrangements / CD 123	Narrative	N/A	Planning Condition and Subsequent Highways Agreement
66	Severance of existing Manor Road	A review of existing Manor Road was undertaken to assess whether it could be upgraded to allow for the required cross-section and vehicle movements for the scheme. It was clear that due to the narrow carriageway width, small radii bends and proximity of residential and commercial properties to the road that upgrades to existing Manor Road would not be feasible. Therefore, a realignment of the road and severance of the elements where residential and commercial properties had direct access was proposed.	Highway Illustrative Arrangements	Narrative	N/A	Planning Condition and Subsequent Highways Agreement

Item No	Description	Assumption/Derivation	Reference	Judgement/Comment	Sensitivity to Change	Control
67	Options related to the closure of Manor Road Level Crossing	<p>Network Rail have a TWAO and permission to develop a bridge over the Marston Vale Line to close the existing level crossing on Manor Road.</p> <p>The understanding is that the principal aim of NR is to close the crossing as a response to the EWR proposed delivery of EWR rail services on the MVL.</p> <p>The Transport Assessment assesses on this basis. It also assesses the effect of Option B which is to close the level crossing and deliver an Active Travel bridge. This is the preferred option.</p>	Highway Illustrative Arrangements	Narrative	N/A	Planning Condition and Subsequent Highways Agreement
68	A minimum headroom of 6.3m on bridges over rail lines	Through discussions with Network Rail they have specified a 6.3m headroom be implemented on all rail overbridges to ensure there is sufficient clearance for future electrification of their assets.	Highway Illustrative Arrangements	Narrative	N/A	N/A
69	Stage 1 Road Safety Audit	A Designers response to the RSA was provided to National Highways and Bedford Brough Council with all recommendations being accepted and incorporated into the design or to be implemented in the post-planning stage.	GG 119	Narrative	N/A	N/A
70	Enabling Works on Manor Road, Broadmead Road and signalisation on Woburn Road Junction	Construction phasing has been reviewed through the development of the scheme proposals. To gain access to the Core Zone construction traffic would need to be routed through Manor Road and Broadmead Road. The proposals for enabling works to support this proposal have been shown to Network Rail and Bedford Borough Council.	Highway Illustrative Arrangements	Narrative	N/A	Planning Conditions And Subsequent Highways Agreement



APPLICATION BY WSP FOR A UNIVERSAL DESTINATIONS AND EXPERIENCES UK PROJECT

Summary of Agreed Position between UDX and the Environment Agency

ECOLOGY AND GROUND CONDITIONS & REMEDIATION

MAY 2025

1. INTRODUCTION

1.1. Purpose of the Agreed Position Summary

- 1.1.1. This Agreed Position Summary ("APS") has been prepared by Universal Destinations and Experiences ("UDX") and the Environment Agency. For the purpose of this APS, UDX and the Environment Agency will jointly be referred to as "the Parties". It presents those matters that have been agreed between the Parties with respect to the scope and methodology of the Ecology chapter, the Ground Conditions, Soils and Agricultural Land chapter and their associated appendices with confirmation that the assessments are regarded as proportionate and appropriate.
- 1.1.2. UDX 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.
- 1.1.3. 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 Entertainment Resort Complex (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 and processing facilities associated with the ERC; vehicle parking, maintenance and servicing; access routes and circulation spaces; landscaping; utility conveyance infrastructure; and use of land necessary to support construction.
- 1.1.4. The planning proposal also includes road and rail-related development including:
- a new slip road to provide access to and from the A421;
 - an expanded railway station on the Thameslink/Midland Main Line at Wixams;
 - improvements to Manor Road; and
 - improvements to certain other local roads.
- 1.1.5. 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
- 1.1.6. Overall, it is intended that this APS will be submitted alongside the planning proposal to give a clear position of the state and extent of agreement between the Parties as at the date on which this APS is signed.

2. MATTERS AGREED BETWEEN THE PARTIES

2.1.1. The Parties are AGREED on the following points:

2.2. Ecology and Nature Conservation

Assessment Methodology

2.2.1. The methodology for the Ecology and Nature Conservation assessment is presented in multiple locations within the ES. Assumptions used to inform the assessment are set out in Section 6.2 of Chapter 6 (Volume 1). An overview of the Ecological Impact Assessment Methodology (hereafter “EclA”) is provided in Section 6.3 and 6.4 of Chapter 6. Difficulties and uncertainties considered in the assessment are set out in Section 6.8 of Chapter 6. The assessment methodology, including assumptions used, is considered appropriate.

Baseline Surveys and Assessment

2.2.2. The Parties agree that the range and scope of ecological surveys completed, pertaining to ecological features of relevance to the Environment Agency’s statutory remit (primarily aquatic habitats), are appropriate for informing the EclA.

2.2.3. Table 2-1 provides a summary of the scope and methodology of surveys undertaken for aquatic ecological receptors. Surveys were undertaken in accordance with current survey methodology guidance.

Table 2-1 – Baseline Surveys and Assessments – Important Ecological Features (IEF)

Assessment Type	Summary of Scope	Status in relation to ES Chapter 6
UKHAB survey including aquatic habitats	A UKHAB survey was completed of the Site. Habitats were described and mapped following the UK Habitat Classification Version 2.0. Habitats of Principal Importance are described within Table 6.6 of Chapter 6.	Completed in full prior to finalisation of Chapter 6, barring some minor access limitations.
Aquatic Ecology Desk Study	Baseline ecological data was gathered from the following sources: <ul style="list-style-type: none"> Water Framework Directive (hereafter “WFD”) status for the catchment was obtained from the Environment Agency’s Catchment Data Explorer website; and A search of the Environment Agency’s Ecology and Fish Data Explorer was completed covering the Site plus a 10km radius around it. 	Completed in full prior to finalisation of Chapter 6.
Aquatic Ecology Scoping Survey	Aquatic habitat scoping assessments were carried out along the watercourses and on the waterbodies present within the Site. These assessed the characteristics of the watercourses and water bodies surveyed plus their suitability to support	Completed in full prior to finalisation of Chapter 6.

Assessment Type	Summary of Scope	Status in relation to ES Chapter 6
	aquatic and amphibious protected species.	
Aquatic macrophyte (vascular plants) survey	Aquatic macrophyte surveys were completed in August 2024. Surveys were carried out using methods as described in the Water Framework Directive UK Technical Advisory Group (2014) UKTAG River Assessment Method Macrophytes and Phytobenthos: Macrophytes (River LEAFPACS2).	Completed in full prior to finalisation of Chapter 6.
Aquatic macroinvertebrate surveys	<p>Aquatic macroinvertebrate surveys have been completed. Aquatic macroinvertebrate samples were collected using either the standard three-minute kick samples of all in channel habitats in proportion to their occurrence, or the standard three-minute bankside sweep survey, where channel profiles and bank steepness constrained access to the channel.</p> <p>Aquatic macroinvertebrate surveys were conducted on Elstow Brook and the Core Zone watercourse in spring and autumn 2024.</p> <p>Predictive System for Multimetrics (hereafter “PSYM”) surveys were completed of the lakes in the Core Zone in August 2024. Aquatic macroinvertebrate sampling consisted of three-minute hand-net sampling methods. Sampling time was allocated according to the mesohabitat types (e.g. flooded marginal grasses or gravel bottomed shallows) present (i.e. sampling time is divided equally between the different mesohabitats).</p> <p>Surveys have been designed with due regard to the following references:</p> <ul style="list-style-type: none"> British Standards Institution. (2012). BS EN ISO 10870:2012 Water Quality – Guidelines for the selection of sampling methods and Devices for Benthic Macroinvertebrates in Freshwaters. London, BSI. 	Completed in full prior to finalisation of Chapter 6.

Assessment Type	Summary of Scope	Status in relation to ES Chapter 6
	<ul style="list-style-type: none"> Environment Agency. (2014). Freshwater macroinvertebrate analysis of riverine samples: Operational Instruction 024_08. Issued 28/01/14. Environment Agency, Bristol. Environment Agency. (2017). Freshwater macroinvertebrate sampling in rivers: Operational Instruction 018 08. Issued 01/03/17. Environment Agency, Bristol. Howard, S. (2002). A guide to monitoring the ecological quality of ponds and canals using PSYM: PSYM Manual. December 2002. Environment Agency, Bristol. 	
Fish surveys	<p>Fish surveys of the watercourses and lakes within the Site were completed in 2024. Due to channel profiles and steep banksides, traditional quantitative electric fishing surveys could not be completed, with environmental DNA (e-DNA) sampling used instead. e-DNA samples were collected from Elstow Brook and lakes within the Lake Zone. The survey methodology followed the standard operating procedure, consistent with BS EN 17805. Surveys have been designed with due regard to the following references:</p> <p>European Standard. (2023). CEN EN 17805:2023 Water quality - Sampling, capture and preservation of environmental DNA from water.</p>	Completed in full prior to finalisation of Chapter 6.
Otter survey	<p>Comprise assessment of habitat suitability of water courses and water bodies within up to 250 m from the Site, plus searches of aquatic habitats and adjacent terrestrial habitats for field signs and other evidence of otters.</p> <p>The otter survey was undertaken of suitable watercourses and waterbodies within the Site in accordance with current best practice guidance (Chanin, 2003).</p>	Completed in full prior to finalisation of Chapter 6, barring some access limitations.

Assessment Type	Summary of Scope	Status in relation to ES Chapter 6
Water vole survey	<p>Comprise assessment of habitat suitability of water courses and water bodies within up to 250 m from the Site, plus searches of aquatic habitats and adjacent terrestrial habitats for field signs and other evidence of water voles.</p> <p>The water vole survey was undertaken of suitable watercourses and waterbodies within the Site in accordance with current best practice guidance (Dean et al, 2016 & Strachan et al, 2011).</p>	Completed in full prior to finalisation of Chapter 6, barring some minor access limitations.

Evaluation and Assessment of Ecological Features

- 2.2.4. The evaluation of the importance of the ecological features (i.e. those summarised in Table 2-1), and the associated assessment of the potential effects of the Proposed Development aligns to current guidance and is presented in Chapter 6 of the ES (Volume 1). The Parties agree that the approach to the EclA for these ecological features is appropriate.

MECHANISMS FOR SECURING ECOLOGICAL AVOIDANCE, MITIGATION, AND ENHANCEMENT MEASURES

Introduction

- 2.2.5. Measures relevant to addressing effects on IEF (as summarised in Table 2-1) and to delivering ecological enhancements are set out in Chapter 6 Section 6.6 (Volume 1) of the ES, in Tables 6.10 and 6.11. The Parties agree that the measures contained in Chapter 6 are appropriate.
- 2.2.6. The following documents, which are referenced from Chapter 6, commit to avoidance and mitigation measures for IEFs:

Outline Construction Environmental Management Plan

- 2.2.7. The Outline Construction Environmental Management Plan (hereafter “OCEMP”) (Appendix 2.3, Volume 3 of the ES) sets out construction phase mitigation measures designed to avoid, reduce, and mitigate effects on aquatic habitats and to support compliance with legislation protecting certain types of wildlife. The Parties agree that the measures contained in the OCEMP are appropriate.

Outline Habitat Creation and Enhancement Plan

- 2.2.8. The Outline Habitat Creation and Enhancement Plan (hereafter “OHCEP”) (Appendix 6.4, Volume 3 of the ES) sets out habitat creation measures designed to mitigate effects on IEF, to support compliance with legislation and policy protecting certain types of wildlife, and to deliver ecological enhancements. The Parties agree that the measures contained in the OHCEP are appropriate.

Outline Landscape and Ecology Management Plan

- 2.2.9. The Outline Landscape and Ecology Management Plan (“hereafter OLEMP”) (Appendix 6.5, Volume 3 of the ES) sets out measures for the establishment, monitoring, and long-term management of habitats and other ecological features during implementation of the Proposed Development. The Parties agree that the measures contained in the OLEMP are appropriate.

Ecological Enhancements Proposed

- 2.2.10. The Proposed Development includes proposals for Ecological Enhancement Areas (hereafter “EEA”) denoted on Figure 1 of Appendix 6.4, Volume 3 of the ES) covering approximately 18% of the Site. These EEAs will support mitigation deliver, and in parts will provide an ecological enhancement of habitats compared to existing Site conditions.
- 2.2.11. The proposed ecological enhancements are set out in Section 6.7 of Chapter 6 (Volume 1) of the ES. The Parties agree that the ecological enhancement measures proposed are appropriate.

2.3. WFD Screening and Scoping Assessment

- 2.3.1. The Parties agree that the approach to the Water Framework Directive Screening and Scoping Assessment (Document Reference 6.15.0) is considered appropriate.

2.4. Ground Conditions and Remediation

2.5. Relevant Contaminant Linkages

- 2.5.1. Based on site information collected to date, the following Relevant Contaminant Linkages (RCL) have been identified for the site and will require some form of remediation to make the site suitable for its intended use:
- RCL 1 - Asbestos containing Soils and asbestos containing materials in Stockpiles;
 - RCL 2 - PAH and TPH in soils;
 - RCL 3 - Dissolved hydrocarbons in groundwater;
 - RCL 4 – Ground gases;
 - RCL 5 - Aggressive compounds (i.e. sulphate and hydrocarbons); and
 - RCL 6 - Previously unidentified contamination

2.6. Remediation Strategy

- 2.6.1. The potential risks to human health, controlled waters (groundwater and surface water) services and buildings posed to the future development from the above RCLs will be addressed in a Remediation Strategy to include the approach to the identification and treatment of unidentified contamination. It is noted that a site wide package of further ground investigation is planned to refine the RCLs and Remediation Strategy key mitigation and control measures include those related to managing dust and protection of surface water, groundwater and soils.

2.7. Construction Phase Mitigation Measures

- 2.7.1. Mitigation procedures during construction will be implemented in accordance with Appendix 11.4 Land Remediation Strategy (Volume 3) and Appendix 2.3: Outline Construction Environmental Management Plan (Volume 3) which requires that this information will be further detailed in the following documents:
- A detailed Construction Environmental Management Plan;
 - A Remediation Strategy;
 - A Materials Management Plan;
 - A Piling Risk Assessment;
 - A Soil Resource Survey; and
 - A Soil Management Plan that would be undertaken prior to enabling and/or construction works.

2.8. Identification of EIA Receptors

- 2.8.1. The following receptors, as shown in Table 2-2, have been identified as part of the Environmental Statement Volume 1 Chapter 11 – Ground Conditions, Soils and Agricultural Land. Receptor Importance is based on DMRB LA109 Geology and Soils, and the Contaminated Land Statutory Guidance (Defra April 2012) and for agricultural land and soil function, pre-1988 Agricultural Land Classification (ALC) mapping and National Soil Resources Institute's Soilscape mapping, respectively.

Table 2-2 - Environmental Statement Ground Conditions Receptors

Receptor	Importance	Justification
Third party neighbours in relation to potential exposure to contamination within underlying soils/groundwater.	Low to Medium	Third party neighbours are those present at adjacent Public Rights of Way (PROW) and Accessible Open Land, surrounding commercial properties, surrounding roads and Kempston Hardwick Station. They are unlikely to be within areas of construction which include significant disturbance of ground during construction. Additionally, the Construction Phase will be undertaken in accordance with the measures set out in the OCEMP. As presented in Appendix 2.3: Outline Construction Environmental Management Plan (Volume 3), all relevant legislation, guidance and best practice will be followed, which will mitigate risks to third party neighbours during construction of the Proposed Development.
Below ground services in relation to potential contamination within the underlying soils/groundwater.	Low	Utility services and structures located offsite but within the 250m Site Boundary including those associated with adjacent commercial and residential properties and surrounding roads and rail.

Receptor	Importance	Justification
Groundwater within the Secondary Undifferentiated Aquifer and Secondary A Aquifer	Medium	The superficial Head Deposits is a Secondary Undifferentiated Aquifer. The superficial Alluvium is a Secondary A aquifer. The Groundsure Report indicates that groundwater residing in the superficial aquifers is of medium to high vulnerability.
Groundwater within the bedrock: Peterborough Member	Low	The Peterborough Member Mudstone is an unproductive aquifer. These are rock layers or drift deposits with low permeability that have negligible significance for water supply or river base flow. No area of the Proposed Development is located within a published groundwater Source Protection Zone (SPZ).
Groundwater within the bedrock: Kellaways Sand Member (Kellaways Formation)	Low to Medium	The Kellaways Sand Member is a confined Secondary A Aquifer situated beneath the Peterborough Member Mudstone. No area of the Proposed Development is located within a published groundwater SPZ. However, ground investigation has proven that a groundwater body is present in the Kellaways Sand Member beneath the Site, that would be vulnerable to pollution from above.
Groundwater within the bedrock: Cornbrash Formation	Low to Medium	The Cornbrash Formation is a Principal Aquifer located beneath the Kellaways Formation. Information has not been found to indicate that it supports local groundwater abstractions and none of the Site is located within a groundwater SPZ. However, the Cornbrash Formation would be vulnerable to pollution from above.
Surface water features	Medium	<p>The Site lies within two surface water catchments, the Elstow Brook (US Shortstown) (Water body ID: GB105033038050 (ecological quality 'Moderate'; physico-chemical quality 'Good'; chemical quality 'Fail')) and the Harrowden Brook (Water body ID: GB105033038010 (ecological quality 'Bad'; Physico-chemical quality 'Good'; chemical quality 'Fail')).</p> <p>The Elstow Brook runs parallel to the western boundary of the Lake Zone.</p> <p>Unnamed lakes/ponds are located throughout the Lake Zone.</p> <p>An unnamed stream runs through the Core Zone, from the "Coronation Lake (existing surface water features shown on Figure 12.3 Existing Surface Water Regime (Volume 2)).</p> <p>Minor field drains are site wide.</p>
Agricultural soils (biomass production)	Medium to High	Previous Agricultural Land Classification study by others has reported Agricultural Land Classification (ALC) Grade 3a (BMV) and 3b (non-BMV) located within the Site Boundary.
Soil Function (ecological habitat, soil carbon, soil hydrology and mineral resource).	Medium	Soils are considered to be Medium due to their likely soil hydrology value and potential ecological and archaeological importance.

2.9. Permits and Licences

2.9.1. Table 2-3 details the permits that may be required in future and will be sought from the EA at the appropriate time.

Table 2-3 – Permits that may be required in future and will be sought from the EA at the appropriate time

Consent / Permission / Licence	Legislation	Project Relevance / Trigger	Authority / Approving Body
Construction			
Water Abstraction Licence	Water Resources Act 1991 The Water Abstraction and Impounding (Exemptions) Regulations 2017	Licence required before abstraction of any water	Environment Agency
Construction Water Discharge Activity Permits	Environmental Permitting (England and Wales) Regulations 2016	Licence required before discharge of any water	Environment Agency
Water Impoundment / Transfer Licence	Water Resources Act 1991	May be required subject to design – could be required for the construction and use of in-stream structures. Would be required ahead of construction of specific activity.	Environment Agency
Flood Risk Activity Environmental Permits Part B11 (standard rules) and/ or B10 (bespoke rules)	Environmental Permitting (England and Wales) Regulations 2016	Required ahead of construction of any works or flood risk activities which are activities in, under and over a main river. Also includes other activities that could affect flooding from a main river or the sea such as those in a flood plain.	Environment Agency
Permit to use fishing instruments other than rod and line in England (Fish Rescue Permit)	Salmon and Freshwater Fisheries Act 1975	Permit covers the use of fishing instruments other than rod and line in England (i.e. electric fishing equipment) rather than the fish rescue itself Required in advance of any substantial works to watercourses and water bodies supporting fish populations, to enable capture and removal	Environment Agency
Greenhouse gas emissions permit	UK Greenhouse Gas Emissions Trading Scheme Order 2020	Required prior to use of any combustion plant used during construction, commissioning and operation which exceeds certain thresholds. i.e. emergency diesels during operation and potentially a CHP plant during construction.	Environment Agency

Medium Combustion Plant Environmental Permit	The Environmental Permitting (England and Wales) Regulations 2016 (as amended in 2018)	Required to operate combustion plant with between 1 and 50 MW thermal input (includes backup diesel generators and natural gas boilers)	Environment Agency
Mobile plant permit	SR2008 No 27: mobile plant for treatment of soils and contaminated material, substances or products.	Standard rules to operate a mobile plant for the treatment of soils and contaminated material, substances or products.	Environment Agency
Licences or permits for off- site disposal of on-site materials.	Section 34 of The Environmental Protection Act 1990	Required if taking waste off site.	Environment Agency
Waste exemptions	Environmental Permitting (England and Wales) Regulations 2016	Required prior to treatment storage or use of waste for a variety of waste treatments, uses and disposals.	Environment Agency
Waste permit (mobile and static crushing operations)	Environmental Permitting (England and Wales) Regulations 2016	Required prior to use of waste treatment plant including crushers.	Environment Agency
Waste Permit (part B)	Environmental Permitting (England and Wales) Regulations 2016	Required prior to use of waste treatment plant which may cause emissions to air.	
Operation			
Water Abstraction Licence	Water Resources Act 1991 The Water Abstraction and Impounding (Exemptions) Regulations 2017	Licence required before abstraction of any water	Environment Agency
Water Impoundment / Transfer Licence	Water Resources Act 1991	May be required subject to design – could be required for the construction and use of in-stream structures. Would be required ahead of construction of specific activity.	Environment Agency
Flood Risk Activity Environmental Permits Part B11 (standard rules) and/ or B10 (bespoke rules)	Environmental Permitting (England and Wales) Regulations 2016	Required ahead of construction of any works or flood risk activities which are activities in, under and over a main river. Also includes other activities that could affect flooding from a main river or the sea such as those in a flood plain.	Environment Agency
Medium Combustion Plant Environmental Permit	The Environmental Permitting (England and Wales) Regulations 2016 (as amended in 2018)	Required to operate combustion plant with between 1 and 50 MW thermal input (includes backup diesel generators and natural gas boilers)	Environment Agency

Mobile plant permit	SR2008 No 27: mobile plant for treatment of soils and contaminated material, substances or products.	Standard rules to operate a mobile plant for the treatment of soils and contaminated material, substances or products.	Environment Agency
Licences or permits for off- site disposal of on-site materials.	Section 34 of The Environmental Protection Act 1990	Required if taking waste off site.	Environment Agency
Waste exemptions	Environmental Permitting (England and Wales) Regulations 2016	Required prior to treatment storage or use of waste for a variety of waste treatments, uses and disposals.	Environment Agency
Waste permit (mobile and static crushing operations)	Environmental Permitting (England and Wales) Regulations 2016	Required prior to use of waste treatment plant including crushers.	Environment Agency
Waste Permit (part B)	Environmental Permitting (England and Wales) Regulations 2016	Required prior to use of waste treatment plant which may cause emissions to air.	
Generic Design Assessment	Health and Safety at Work etc. Act 1974	Allows the regulators to assess the safety, security and environmental implications of designs.	Environment Agency



MATTERS YET TO BE AGREED BETWEEN THE PARTIES

The Parties confirm that the following areas are TO BE AGREED by the Parties:

None.

SoAP is prepared jointly and agreed by the parties.

Signed by

[Redacted Signature]

For and behalf of UDX

[Redacted Signature]

Senior Vice President, External Affairs

Date:14/05/2025.....

Signed by

[Redacted Signature]

For and behalf of the EA

[Redacted Signature] MRTPI

National Infrastructure Account Manager

Date:13/05/2025.....



APPLICATION BY WSP FOR A UNIVERSAL DESTINATIONS AND EXPERIENCES UK PROJECT

Summary of Agreed Position

WATER RESOURCES

SUMMARY OF AGREED POSITIONS BETWEEN WSP, THE ENVIRONMENT AGENCY AND BEDFORD GROUP OF INTERNAL DRAINAGE BOARDS

MAY 2025



1. INTRODUCTION

1.1. Purpose of this Summary of Agreed Position

This Summary of Agreed Position ("SoAP") has been prepared by UDX and the Environment Agency ("EA") and Bedford Group Internal Drainage Board ("IDB"). For this SoAP, UDX, EA and IDB will jointly be referred to as "the Parties".

- 1.2. This summary note contains the key principles for the Flood Risk Assessment and Surface Water Drainage Strategy for the Universal Destination and Experiences UK Project at the Former brickworks and adjoining land, Kempston Hardwick, Bedford. Annex 1 shows the Site boundary.
- 1.3. UDX consulted with the IDB and the EA during 2024 and discussed principles and approach for Flood Risk and Drainage. This document summarises the intent and outcomes stated in meetings held with the Environment Agency. The principles and conditions inform the **Environmental Statement Chapter 12 – Water Resources (Volume 1)** and supporting appendices **12.1 Flood Risk Assessment (Volume 3)**, **12.2 Water Strategy (Volume 3)** and **12.3 Drainage Strategy (Volume 3)**.
- 1.4. The documents mentioned in 1.3 above are developed to an outline level of detail, and the key principles are based on a cautious worst case approach, using existing available information as stated in Section 2.2. Detailed designs supported by site specific flood modelling as stated in Section 2.2.2 will be developed to deliver on the commitments made. The Proposed Development Zones are shown in Figure 1, and existing waterbodies are shown in Figure 2 for reference.
- 1.5. Preparation of this SoAP has been informed by a programme of discussions between the Parties. The purpose of this SoAP is to set out agreed information about the Proposed Development.
- 1.6. This SoAP relates to "FLOOD RISK, SURFACE WATER STRATEGY and WATER RE-USE".
- 1.7. Overall, this SoAP is intended to give a clear position of the state and extent of agreement between the Parties as at the date on which this SoAP is signed.
- 1.8. In the following text, where a principle has been discussed and found to be acceptable, it is marked as "AGREED". Where a principle is subject to an AGREED process post planning consent, for which the output will be submitted for approval to the EA/IDB, it is marked as "TO BE AGREED".

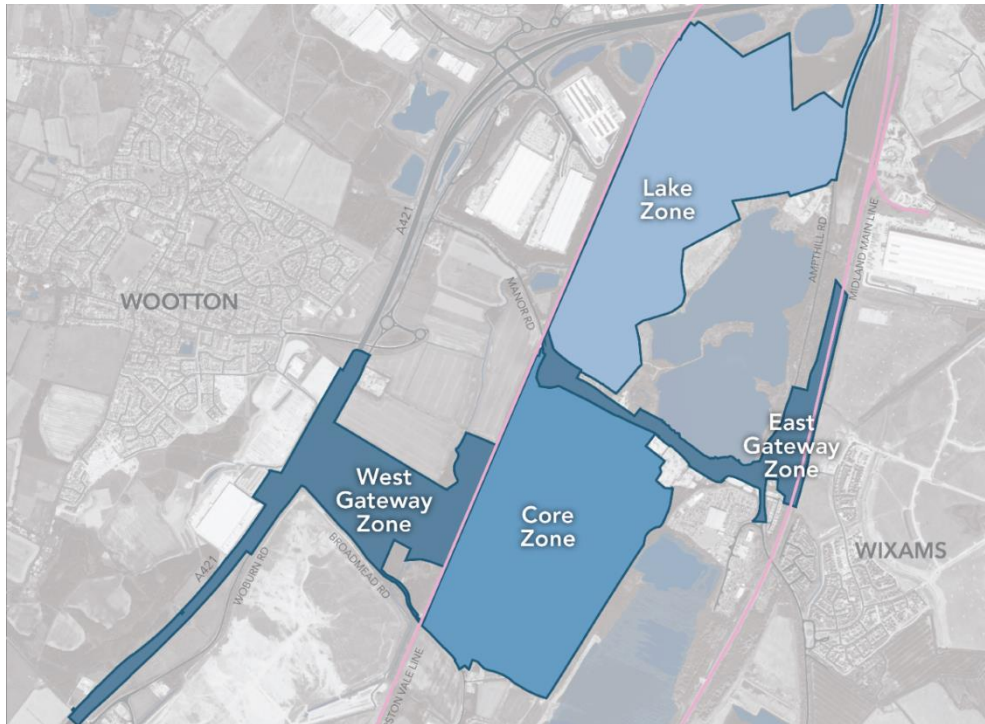


Figure 1 - Zone Plan

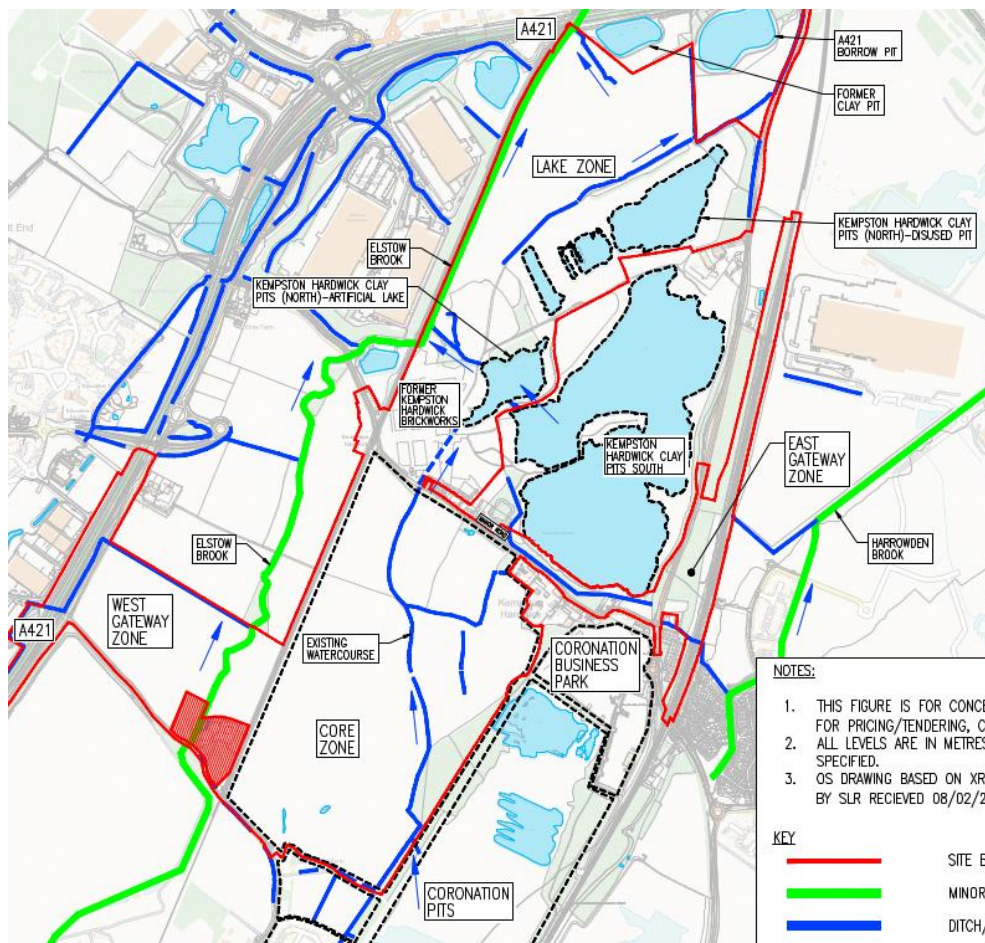


Figure 2 - Existing Waterbodies

2. MATTERS AGREED BETWEEN THE PARTIES

2.1. The Parties are AGREED on all matters, excluding those outlined in Section 3 below, and in particular are AGREED on the following points:

2.2. Flood Risk/Flood Modelling

2.2.1. Assessment of flood risk for the Proposed Development within the planning proposal documents is based on the existing available modelling from the EA, IDB and Bedford Borough Council summarised below:

- IDB Flood Model “Elstow Brook (Wooton Brook) Hec-Ras Model” dated 2017 used for definition of Flood Zones 1 and 3a.
- EA Flood Model “Mid Great Ouse Flood Mapping Detailed” dated 23rd August 2011 used for definition of Flood Zones 1, 2 and 3.
- BBC SFRA Level 2 “Land at Kempston Hardwick” dated May 2022 used for definition of Flood Zone 3b.

2.2.2. A bespoke site specific 1D-2D flood model using Flood Modeller and TUFLOW software will be developed post planning consent to inform detailed design. Flood models include Fluvial and Surface Water sources for existing baseline and proposed development scenarios. A Hydrology Flood Study will be undertaken to support the detailed flood models. The scope of models to be completed will be agreed with the Environment Agency. The output will be submitted for approval by the EA/IDB. Should conditions change as a result of site specific modelling, a Flood Risk Assessment Addendum will be submitted to and approved by the EA and IDB.

2.2.3. The updated modelling will be used to inform detailed design. Key matters include finished floor levels, flood storage compensation, the extent of Flood Zone 3b, the flow regime.

2.2.4. Flood Compensation will be provided within the Lake Zone where proposed development is located in Flood Zone 3a. This area is identified as the Ecological Enhancement Area in the northern part of Lake Zone (approximately seven hectares). Ground levels will be lowered approximately 250mm to maintain surface level flood volume capacity (Flood Zone 3) in the event that water overtops from Elstow Brook, ensuring no increase to off-Site flood risk. This commitment is based on existing flood model information summarised under 2.2.1, and is subject to verification as a result of detailed flood modelling described in 2.2.2 and 2.2.3.

2.2.5. Based on existing flood modelling data, there is no Proposed Development located in Flood Zone 3b.

2.2.6. The northern boundary road in the Lake Zone will be set a minimum of 600mm above the maximum 1 in 100 year plus 20% climate change event fluvial flood level of 29.973m AOD (based on the IDB Hec-Ras Model mentioned under 2.2.1) to ensure safe means of access and egress. Finished Floor Levels are to be set a minimum of 600mm above the design flood level.

2.2.7. Where the EA Long Term Flood Risk Mapping shows surface water flooding originating from off-site, as part of detailed design, levels will be engineered to direct flows towards SuDS features and watercourses, retaining the natural existing storage volume of the land and ensuring that levels do not direct additional exceedance flows off-site.

2.2.8. All buildings within the development will have raised thresholds above the external levels, to reduce the risk of surface water flooding.

2.2.9. Climate change allowance for the Upper and Bedford Ouse Management Catchment peak river flows is 19% for the 2080's central estimate, and for peak rainfall intensities is 40% for the 2070's upper end allowance.

2.3. Surface Water Drainage Strategy

2.3.1. The existing watercourse thorough the Core Zone will be diverted to facilitate the Proposed Development.

2.3.2. Surface Water will be attenuated for up to the 1 in 100 year plus 40% climate change storm event in the Lake Zone Clay Pits.

2.3.3. Infiltration on-site is deemed unviable based on the impermeable nature of soils.

2.3.4. Surface water will be discharged to existing watercourses.

2.3.5. Surface Water runoff rates will be limited to a maximum of QBAR greenfield rates, calculated using the FEH statistical method. Litres/second/hectare rates are stated as below:

Zone	Greenfield QBAR Rate
• Core & Lake	2.5 l/s/ha
• West Gateway	3.13 l/s/ha
• East Gateway	3.13 l/s/ha

2.3.6. Proposed Surface Water Runoff from the Core and Lake Zones will be discharged and pumped to Elstow Brook. Surface water will be directed to a proposed valve complex and outfall either to:

- A water processing and collection plant which provides non-potable water for the Proposed Development;
- Re-enter the Kempston Hardwick Clay Pits (North) - artificial lake;
- Or Elstow Brook at a rate restricted to greenfield QBar for the contributing catchment.

2.3.7. In addition to the above, discharge to Elstow Brook will be maintained at a minimum equivalent greenfield rate for the site areas (estimated at a maximum of 50 Ha) currently draining directly to it. The watercourse will not be starved of existing flows originally from the site.

2.3.8. Surface Water from the Proposed Development will receive treatment in a SUDS treatment train as per the CIRIA SuDS Manual Simple Index Approach (SIA) prior to discharge to the watercourse.

2.3.9. Land Drainage Consent will be secured from the IDB post-planning consent for all discharges and modifications to IDB watercourses, including culverting or bridge crossings.

2.3.10. A WFD Assessment has been carried out for the Site and based on the proposed embedded mitigation measures contained in the report, there will be no deterioration in WFD quality elements or the overall WFD status during the construction and operation phase. The report is annexed to **Appendix 12.3 Drainage Strategy (Volume 3)** and will be submitted as part of the planning application.

2.3.11. As part of the **Environmental Statement Volume 1 Chapter 12 – Water Resources** WFD consideration has been embedded into the design including:

- Proposed road crossings located in West Gateway Zone over Elstow Brook will consist of a clear span bridge with the soffit set 600mm higher than the 1 in 100 year plus climate change modelled river level, to be approved by IDB via Land Drainage Consent.
- Bridge abutments will be set back 10m from the top of bank with detailed design informed by riparian habitat, bank stability and ecological importance to reduce impacts.
- The watercourse diversion located in Core Zone will be replaced within the same Zone and the form, shape and appearance will be enhanced through meandering channel, varied side slopes, landscaping vegetation, improved gradients, and cross-sectional shape.

2.4. Identification of EIA Receptors

2.4.1. The following receptors have been identified as part of the **Environmental Statement Volume 1 Chapter 12 – Water Resources**. Receptor Importance is based on DMRB LA113 Road drainage and the water environment.

Table 2 - Environmental Statement Water Chapter Receptors

Receptor	Importance	Justification
Existing Watercourse – Core Zone	Medium	Local watercourse primarily draining the field, poorly maintained, cloudy stagnant water, flat gradients. Will receive incoming flows from Coronation Pits in the future (25 to 50 years) once the Pits fill and the overflow is activated.
Elstow Brook	High	WFD monitored water body with Moderate Ecological Status. Modelled peak flow of 14m ³ /s for 1 in 100 year +20% Climate change.
Coronation Pits (CWS)	Medium	Former clay pit part of a restoration project for enhanced landscape, habitat and water body creation, non-statutory designation Bedford CWS.
Kempston Hardwick Clay Pits (north) – disused clay pits 1987	Low	Former clays pits from Kempston Hardwick Brickworks. Previously drained in 2018.
Kempston Hardwick Clay pits (North) – Artificial Lake	High	Former Clay pit 1978, now an artificial lake. Receives overflows from the CWS and overflows to Elstow Brook, supporting birds and fish.
Kempston Hardwick Clay Pit (south)	High	Former clay pit, now part of the Bedford CWS locally significant size of water body supporting birds and fish.
A421 Borrow Pit	Low	Small historic borrow pit originally used for the construction of the new A421 Junction, now an artificial lake. No flood risk vulnerability or WFD classification.
Former Clay Pit 1987 (North of the Site) - Artificial Lake	Low	Former clay pit, now an artificial lake. No flood risk vulnerability or WFD classification.
Water Supply Resources	High	Anglian Water (Ruthamford South) under serious water stress reference WRMP24.
Foul Water - Receiving Water Environment	High	Anglian Water has confirmed that upgrades will be required to Bedford Water Recycling Centre prior to discharge of treated flows to the receiving water environment.
People/Property/ Infrastructure affected by Surface Water Drainage Infrastructure capacity	High	Existing watercourses are unlikely to have adequate capacity for freely discharging flows from the Proposed Development, therefore onsite flow controls and attenuation are required to manage flood risk.
Site Users	High	Flood Risk to Construction Site Workers.
Alluvium secondary A and head secondary (undifferentiated) superficial deposit aquifers	Medium	The superficial deposits, though classed as secondary aquifers (secondary A and secondary (undifferentiated)), are thinly laterally distributed, and are not considered viable groundwater resources.

2.5. Future Applications

2.5.1.As mentioned above in Sections 2.2.2, 2.3.9, and 2.3.10 the following applications will be made to the EA/IDB where relevant. Applications will be submitted and approved post planning consent, and prior to Construction:

- 2.5.1.1. Land Drainage Consent to be submitted to the IDB for all proposed works to existing water bodies including Core Zone watercourse diversion, Elstow Brook, and ordinary watercourses within their jurisdiction.
- 2.5.1.2. Bespoke Site Specific Flood Modelling to be submitted to the EA and IDB for approval under Planning Conditions and Design Standards.
- 2.5.1.3. Permits (if required) which may include the following application mechanisms where relevant, and not be limited to:
 - Water Abstraction Licence;
 - Water Discharge Activity Permit;
 - Flood Risk Activity Permit;
 - Environmental Permit;
 - Standard Rules Permit;
 - Bespoke Permit;
 - Evidence based review request or similar.

2.6. Water Re-Use

- 2.6.1. Water demand (domestic and non-domestic) will be reduced by implementing water efficient fixtures and processes. The level of water efficiency will comply with the Building Regulations and align with the requirements to achieve LEED Gold accreditation.
- 2.6.2. The level of water efficiency will be confirmed post planning and will comply with the requirements of Bedford Borough Council planning policies 50S and 52 and will contribute to achieving LEED gold certification.
- 2.6.3. The Water Strategy flow diagram is shown in Figure 3 for information. Anglian Water has agreed to provide water supply for domestic use only. Consequently, the water demand from non-domestic uses will be met using Strategic Rainwater Harvesting as an alternative water source.
- 2.6.4. Water demand from Site will be met through the combination of:
 - A potable water supply (provided by Anglian Water); and
 - A non-potable water supply, sourced from the storage and treatment of rainwater harvested from the Site's drainage water ponds' catchment, including water run-off generated by washdown activities on the Site.
- 2.6.5. Water abstracted from the drainage ponds will be treated to fit-for-purpose non-potable water quality standards.
- 2.6.6. Daily rainwater yield was calculated using British Standard BS16941-1:2024.
- 2.6.7. The non-potable water supply is sufficient to meet the non-domestic uses water demand for process water (irrigation, park washdown and water feature supply) for the Opening Year and Full Buildout.
- 2.6.8. Wastewater generated by the non-potable water treatment works and closed-loop systems will be discharged to Anglian Water's sewer network subject to trade effluent consent.

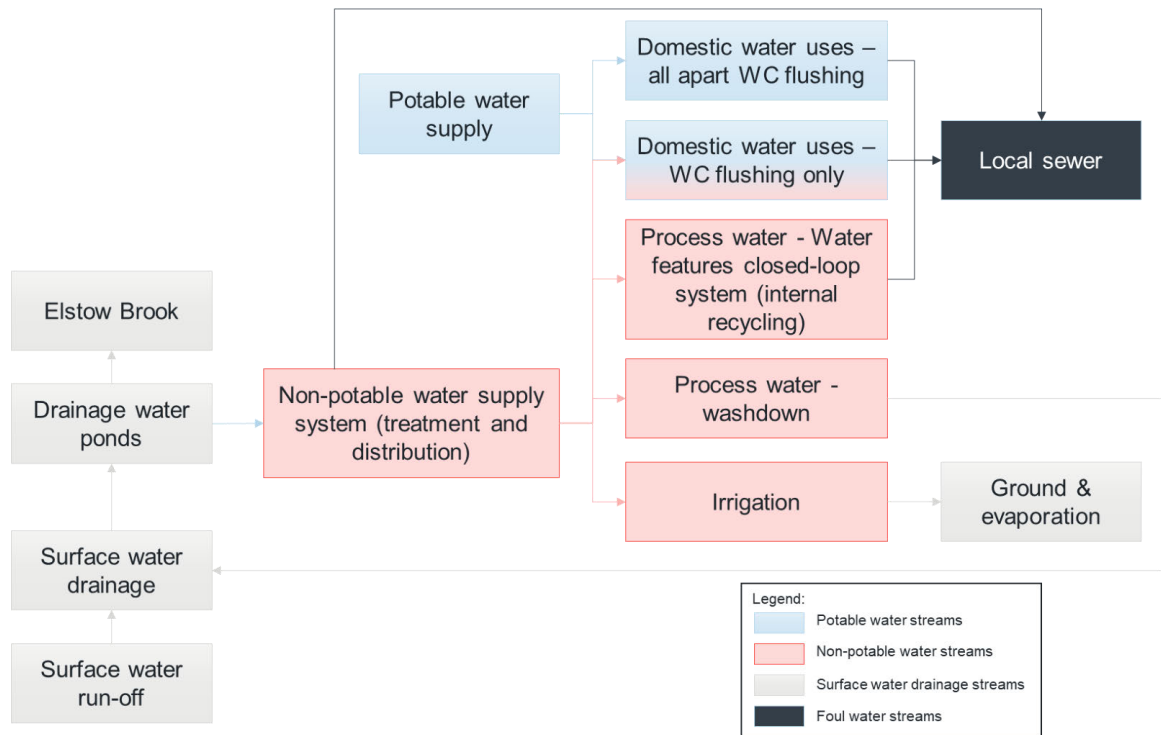


Figure 3- Water Strategy

3. MATTERS YET TO BE AGREED BETWEEN THE PARTIES

3.1. The Parties confirm that the following areas are TO BE AGREED by the Parties:

3.1.1. None.

SoAP is prepared jointly and agreed by the parties.

Signed by

[REDACTED]

Senior Vice President, External Affairs
For and behalf of UDX

[REDACTED]

.....
Date: ...14 May 2025....

Signed by

[REDACTED]

MRTPI National Infrastructure Account Manager
For and behalf of the EA

[REDACTED]

Date: ..13 May 2025....

Signed by

[REDACTED]

Principal Engineer
For and behalf of the IDB

[REDACTED]

.....
Date: ..14/05/2025.....



ANNEX 1 SITE BOUNDARY

Date Saved: 5/9/2025 10:44:24 AM
Document Path: \\uk.wspgroup.com\central data\Projects\70116xxx\70116516 - Project 320\03 WIP\GIS\ES Template\Figure 1. Site Boundary.mxd



Legend

Redline Boundary

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PD1	XX	XX	XX	01/10/2024
FIRST DRAFT ISSUE				
REVISION	DRAWN	CHECKED	APPROVED	DATE
DESCRIPTION				
<div></div>				
Client Name: Universal Destinations & Experiences				
PROJECT TITLE: Universal Destinations & Experiences UK Project				
DRAWING TITLE: FIGURE 1: P320 SITE BOUNDARY				
STATUS: For Information				
DRAWN: SS	CHECKED: SS	APPROVED: SB	AUTHORISED: AW	
SCALE @ A3 SIZE: 1:15,000		DATE: 09/05/2024	REVISION: P01	
DRAWING NUMBER: Figure 1				



Universal Destinations & Experiences UK Project

Summary of Agreed Position with Natural England

May 2025

1. INTRODUCTION

1.1 Purpose of this Agreed Position Summary

- 1.1.1.1. This Agreed Position Summary ("APS") has been prepared by Universal Destinations and Experiences ("UDX") and Natural England ("NE"). For the purpose of this APS, UDX and NE will jointly be referred to as "the Parties".
- 1.1.1.2. UDX 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.
- 1.1.1.3. 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 Entertainment Resort Complex (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 and processing facilities associated with the ERC; vehicle parking, maintenance and servicing; access routes and circulation spaces; landscaping; utility conveyance infrastructure; and use of land necessary to support construction.
- 1.1.1.4. The planning proposal also includes road and rail-related development including:
- a new slip road to provide access to and from the A421;
 - an expanded railway station on the Thameslink/Midland Main Line at Wixams;
 - improvements to Manor Road; and
 - improvements to certain other local roads.
- 1.1.1.1 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
- 1.1.1.2 Overall, it is intended that this APS will be submitted alongside the planning proposal to give a clear position of the state and extent of agreement between the Parties as at the date on which this APS is signed.
- 1.1.1.3 Overall, this APS is intended to give a clear position of the state and extent of agreement between the Parties as at the date on which this APS is signed.

2 MATTERS AGREED BETWEEN THE PARTIES

2.1 Introduction

- 2.1.1.1 This Section sets out those matters which are agreed between the Parties. The matters agreed relate to the following which are considered to fall within Natural England's statutory duties:
- Habitat Regulations Assessment (HRA) and International Statutory designated sites;
 - National statutory designated sites (Sites of Special Scientific Interest, National Nature Reserves); and
 - Protected species, specifically in relation to protected species licensing.
- 2.1.1.2 In addition, the following matters are of interest to Natural England in their role as the statutory nature conservation body for England, albeit these do not fall within Natural England's statutory remit in the context of the Proposed Development:
- The Natural England Green Infrastructure Framework and Principles; and
 - Biodiversity Net Gain

2.2 Environmental Statement – Ecology and Nature Conservation

2.2.1 Assessment Methodology

- 2.2.1.1 The methodology for the Ecology and Nature Conservation assessment is presented as follows within the ES. Assumptions used to inform the assessment are set out in Section 6.2 of Chapter 6 (ES Volume 1). An overview of the Ecological Impact Assessment Methodology (hereafter "EclA") is provided in Section 6.3 and 6.4 of Chapter 6. Difficulties and uncertainties considered in the assessment are set out in Section 6.8 of Chapter 6. The methodology for assessment presented is considered appropriate.

2.2.2 Baseline surveys and assessment

- 2.2.2.1 NE has adopted standing advice for protected species, which includes guidance on survey and mitigation measures and does not generally provide bespoke advice outside of the licencing process. Natural England does not have any concerns relating to the range and scope of the ecological surveys completed for bats and badger, i.e. those species which could be subject to a subsequent protected species licence application (as detailed in Section 2.5).
- 2.2.2.2 Table 2.1, below, sets out the status of baseline ecological surveys and assessments for protected species that are expected to require a Natural England protected species licence and that have informed the Ecology and Nature Conservation chapter of the ES.

Table 2-1 – Baseline Surveys and Assessments

Assessment Type	Summary of Scope	Status in relation to ES Chapter 6
Badger survey	Badger surveys, comprising a mixture of field sign searches, repeat inspections of setts, and camera-trap monitoring have been completed in 2024 and Q1 2025.	Completed in full prior to finalisation of Chapter 6, barring some minor access limitations.

Assessment Type	Summary of Scope	Status in relation to ES Chapter 6
	<p>Additional detail on the survey methods employed and results obtained are included in sections 3 and 4 of Appendix 6.3 Badger Survey Report in Volume 3.</p> <p>Bait marking surveys are not required to support the EclA but will be provided to NE protected species licensing team in support of a future protected species licence application for badgers).</p>	
Ground Level Tree Assessment (hereafter “GLTA”) for bats	<p>GLTA surveys have been completed across the Site, to assess the suitability of trees for use by roosting bats.</p> <p>Additional detail on the survey methods employed and results obtained are included in sections 3 and 4 of Appendix 6.10 (Bat Roost Appraisal Report) in Volume 3.</p>	Completed in full prior to finalisation of Chapter 6, barring some minor access limitations.
Preliminary roost assessment of structures	<p>Preliminary assessment of structures within and adjacent to the Site to check their suitability for roosting bats by visual inspection.</p> <p>Additional detail on the survey methods employed and results obtained are included in sections 3 and 4 of Appendix 6.10 (Bat Roost Appraisal Report) in Volume 3.</p>	Completed in full prior to finalisation of Chapter 6, barring some minor access limitations.
Targeted surveys of trees to confirm suitability for roosting bats and gather data on any roosts present.	<p>Comprised a combination of activity (roost emergence) and climbed inspections of trees identified as suitable for roosting bats via the GLTA survey.</p> <p>Additional details on the methods employed and interim results obtained are presented in sections 3 and 4 of Appendix 6.10 (Bat Roost Appraisal Report) in Volume 3.</p>	<p>Survey data to inform ES gathered prior to finalisation of Chapter 6, barring some minor access limitations.</p> <p>Further survey visits to inform detailed mitigation design and a protected species licence application to Natural England will be completed by Q3 2025.</p> <p>The EclA is therefore based on a precautionary approach with respect to tree-roosting bats, whilst taking account of the range of survey data gathered and analysed to date.</p>
Targeted surveys of buildings and structures to confirm likely presence/absence of roosting bats and status of any identified roost(s).	<p>Comprise a combination of activity (roost emergence) and internal and external inspections of buildings/structures identified as suitable for roosting bats via preliminary roost assessment of structures.</p> <p>Additional details on the methods employed and interim results obtained are presented in sections 3 and 4 of Appendix 6.10 (Bat Roost Appraisal Report) in Volume 3.</p>	Reporting of 2024 surveys is provided in Appendix 6.10 (Volume 3). Some buildings/structures within the Site have received the full survey effort recommended in line with good practice guidance in 2024, while others require additional visits to

Assessment Type	Summary of Scope	Status in relation to ES Chapter 6
		<p>complete the recommended survey effort.</p> <p>Remaining survey visits of buildings/structures requiring greater survey effort to inform detailed mitigation design and protected species licensing and associated reporting will be completed by Q3 2025.</p> <p>The EclA is therefore based on a precautionary approach with respect to the use of buildings/structures by bats, whilst taking account of the wide range of survey data gathered and analysed to date.</p>
Bat activity surveys	<p>Comprised a combination of walked transect surveys and static bat detector deployment to gather data on bat foraging and commuting behaviour at and adjacent to the Site.</p> <p>Additional details on the methods employed and interim results obtained are presented in sections 3 and 4 of Appendix 6.16 (Bat Activity Survey Report) in Volume 3.</p>	<p>Completed in full prior to finalisation of Chapter 6, barring some limitations to individual survey locations due to health and safety issues and equipment failure.</p> <p>Additional survey effort being deployed in Q2 – 3 2025 is not required for the EclA but is undertaken to inform a protected species licence application to Natural England.</p> <p>The EclA is therefore based on a precautionary approach with respect to the use of the Site by foraging and commuting bats, whilst taking account of the wide range of survey data gathered and analysed to date.</p>

2.2.3 Evaluation of Ecological Features

- 2.2.3.1 The evaluation of the importance of ecological features is presented in Chapter 6 Section 6.5 of the ES (Volume 1). The selection and evaluation of the importance of ecological features is considered appropriate.

2.2.4 Assessment of Impacts during Construction

- 2.2.4.1 The assessment of impacts and their effects on Important Ecological Features (hereafter “IEF”) during construction for Ecology and Nature Conservation including with consideration to mitigation measures is presented in Chapter 6 Table 6.10 of the ES (Volume 1). The assessment of impacts during construction presented is considered appropriate.

2.2.5 Assessment of Impacts during Operation

- 2.2.5.1 The assessment of impacts and their effects on IEF during operation for Ecology and Nature Conservation including with consideration to mitigation measures is presented in Chapter 6 Table 6.11 of the ES (Volume 1). The assessment of impacts during operation presented is considered appropriate.

2.2.6 Assessment of Cumulative Impacts

- 2.2.6.1 The assessment of cumulative impacts and their effects on IEF during construction and operation for Ecology and Nature Conservation is presented in Chapter 6 Section 6.6 (Volume 1), and in Appendix 6.6 Inter-Project Cumulative Assessment Report (Volume 3). Natural England does not raise any concerns relating to cumulative impacts.

2.3 HABITATS REGULATIONS ASSESSMENT

2.3.1 Assessment of Effects for Habitats Regulations Assessment

- 2.3.1.1 The assessment of effects on Habitats Sites (Habitats Sites are taken to include Special Areas of Conservation (hereafter “SACs”) and Special Protection Areas (hereafter “SPA”), potential SAC and SPA sites, and (as a matter of government policy) Ramsar Sites) is presented in the Report to Inform Habitats Regulations Assessment Screening (document reference 6.14.0). The Parties agree that the findings of this assessment are appropriate, i.e. that the Proposed Development would not trigger Likely Significant Effects to any Habitats Site, either alone or in-combination with other plans and projects. The parties therefore agree that in the absence of Likely Significant Effects, there is no prospect of adverse effects on the integrity of any European Site and there is no requirement for the Proposed Development to be subject to an appropriate assessment under the Conservation of Habitats and Species Regulations (2017, as amended).

2.4 MECHANISMS FOR SECURING ECOLOGICAL AVOIDANCE, MITIGATION, AND ENHANCEMENT MEASURES

2.4.1 Introduction

- 2.4.1.1 Measures relevant to addressing effects on IEF and to delivering ecological enhancements are set out in Chapter 6 Section 6.6 (Volume 1) of the ES, in Tables 6.10 and 6.11. An overview of the proposed habitat creation measures and other spatially relevant mitigation and enhancement measures is provided on Figure 1 of the Outline Habitat Creation and Enhancement Plan (Appendix 6.4, Volume 3 of the ES). Habitat management and maintenance measures are presented in the OLEMP (Appendix 6.5, Volume 3 of the ES).

2.4.2 Outline Construction Environmental Management Plan

- 2.4.2.1 The Outline Construction Environmental Management Plan (hereafter “OCEMP”) (Appendix 2.3, Volume 3 of the ES) sets out construction phase mitigation measures designed to avoid, reduce, and mitigate effects on IEF and to support compliance with legislation protecting certain types of wildlife. The Parties agree that the measures relevant to Ecology and Nature Conservation are appropriate.

2.4.3 Outline Habitat Creation and Enhancement Plan

- 2.4.3.1 The Outline Habitat Creation and Enhancement Plan (hereafter “OHCEP”) (Appendix 6.4, Volume 3 of the ES) sets out habitat creation measures designed to mitigate effects on IEF, to support compliance with legislation and policy protecting certain types of wildlife, and to deliver ecological enhancements. The Parties agree that the measures contained in the OHCEP are sufficient to address Natural England's statutory remit.

2.4.4 Outline Landscape and Ecology Management Plan

- 2.4.4.1 The Outline Landscape and Ecology Management Plan (“hereafter OLEMP”) (Appendix 6.5, Volume 3 of the ES) sets out measures for the establishment, monitoring, and long-term management of habitats and other ecological features during implementation of the Proposed Development. The Parties agree that the measures contained in the OLEMP are sufficient to address Natural England's statutory remit.

2.4.5 Ecological Enhancements Proposed

- 2.4.5.1 Biodiversity Net Gain is not legally required for this Proposed Development due to the consenting route being followed.
- 2.4.5.2 The Proposed Development includes proposals for Ecological Enhancement Areas (hereafter “EEA”) denoted on Figure 1 of Appendix 6.4, Volume 3 of the ES) covering approximately 18% of the Site. These EEAs will support mitigation delivery, and in parts will provide an ecological enhancement of habitats compared to existing Site conditions. The proposed ecological enhancements are set out in Section 6.7 of Chapter 6 (Volume 1) of the ES.
- 2.4.5.3 The Parties agree that the ecological enhancement measures proposed are sufficient to address Natural England's statutory remit.

2.4.6 Use of the Natural England Green Infrastructure Standards

- 2.4.6.1 UDX is committed to delivering a high-quality design that integrates green and blue infrastructure within the Site boundary, guided by Natural England's (NE's) Green Infrastructure (GI) Framework.
- 2.4.6.2 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 project's primary function. This commitment has been embedded in both the Design Principles and GI Strategy.
- 2.4.6.3 In response to Natural England's position on GI, UDX has developed a GI Statement (Appendix 1.6 to the Design and Access Statement (6.2.0)). The GI Statement responds directly to the five Headline Standards of Natural England's GI Framework which includes:
- A GI Strategy (Standard 1);
 - Evaluation against accessibility to green space (Standard 2);
 - Consideration of contribution to urban nature recovery (Standard 3);
 - Calculation of Urban Greening Factor (Standard 4); and
 - Assessment of Urban Tree Canopy Cover (Standard 5)
- 2.4.6.4 In developing the GI Strategy (Standard 1), UDX has considered both project-specific objectives and the 15 GI Principles set out in Natural England's GI Framework. The GI Strategy builds on a comprehensive baseline analysis (Chapter 2 and Annex), which informs spatial key moves aligned with the project's Design Principles (Chapter 3).
- 2.4.6.5 Chapter 4 provides a detailed evaluation of the Proposed Development against GI Standards 2 to 5. Chapter 5 offers a summary of the GI Strategy's alignment with the spatial key moves (Section 5.1), an overview of the evaluation results (Section 5.2), and a response to Natural England's "What" Principles which define the characteristics of high-quality GI (Section 5.3).
- 2.4.6.6 The Parties will continue to work together to maximise the added value of use of the Green Infrastructure Standards for the Proposed Development.

2.5 OTHER PERMITTING REGIMES - PROTECTED SPECIES LICENSING

2.5.1 Likely Protected Species Licensing Requirements

- 2.5.1.1 Based on desk study and survey data gathered to date, it is likely that the Proposed Development will require protected species licences from Natural England for bats and badgers *Meles meles*. Site-specific licences are expected to be needed to enable a derogation of the legislation protecting these species, thus avoiding infringements of wildlife legislation and allowing mitigation for these species to be delivered.
- 2.5.1.2 Great Crested Newt (*Triturus cristatus*) are present within the Site, with survey data gathered by UDX confirming that the Proposed Development would result in licensable impacts on this species. UDX has received in-principle confirmation from NatureSpace Partnership (delivery organisation of the scheme in Bedfordshire) that a District Level Licence (DLL) adoption approach will be possible to mitigate impacts on great crested newt and enable a derogation of the legislation protecting this species.
- 2.5.1.3 Based on the baseline ecological information as presented in the EcIA at this time, there is currently no evidence that any other protected species licences will be required. Should further survey work, including any pre-construction/pre-commencement surveys, identify likely impacts to other protected species, then the need for the appropriate licences will be considered and pursued accordingly.
- 2.5.1.4 The Parties are agreed that this is an appropriate summary of the likely situation as regards protected species licence requirements for the Proposed Development, based on the data and information available and as reviewed at this time. Based on the data available at the time of concluding this APS the Parties are not aware of any material impediments to the future granting of badger or bat protected species licences for the Proposed Development by Natural England, subject to the points as set out in the Letters of Comfort provided by Natural England (copies provided in Appendix A) being addressed in the formal licence application submissions.

2.5.2 Future Granting of Protected Species Licences

- 2.5.2.1 The Parties agree that they will continue to work together such that UDX can provide Natural England with suitable and sufficient protected species licence application materials to enable Natural England to grant any necessary licences.
- 2.5.2.2 Survey work to inform protected species licensing and related matters in relation to bats and badgers is ongoing. A summary of completed and planned survey work is set out in Table 2.1. The following survey work is expected to be completed to inform future protected species licence applications:
- Reporting of bait-marking surveys for badgers, to gather additional information on clan structure within and adjacent to the Site;
 - Completion of external and where required (and safe to access) internal surveys of buildings and structures to confirm presence/likely absence of roosting bats;
 - Completion of additional climbed and emergence/activity bat surveys of trees within the Site to confirm the presence/likely absence of bat roosts;
 - Completion of additional emergence/activity surveys of buildings and structures, where warranted, to confirm the presence/likely absence of bat roosts.

2.5.2.3 The Parties also acknowledge and agree that additional details of mitigation measures will be developed as part of any future applications for protected species licences. This is likely to include but not be limited to the following key aspects:

- Development of detailed design and siting information for any artificial badger setts;
- Development of detailed specifications for replacement/additional roost features for roosting bats, e.g. specification for type and number of bat boxes and exact locations and design of any structures for roosting bats; and
- Detailed design of habitat creation, enhancement, and management measures via the HCEP and LEMP for phases of the Proposed Development.

2.5.2.4 Subject to satisfactory completion of the above, and to the points as set out in the Letters of Comfort provided by Natural England being addressed in the formal licence application submissions, The Parties do not anticipate any material impediments to the grant of the identified protected species licences for the Proposed Development.

3 AGREEMENT

This APS is prepared jointly and agreed by the parties.

Signed by [REDACTED],
Senior Vice President, External Affairs

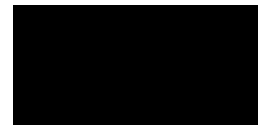


For and on behalf of UDX

.....

Date: 14th May 2025.....

Signed by [REDACTED], Deputy Director West Anglia Area



For and behalf of Natural England



Deputy Director – West Anglia

Date: 13th May 2025.....



APPENDIX A - WILDLIFE LICENSING LETTERS OF COMFORT

Date: 12 May 2025
Our ref: Universal Theme Park Development, Bedford
Your ref: Universal Theme Park Development, Bedford



BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business
Park
Electra Way
Crewe
Cheshire
CW1 6GJ

0300 060 3900

Dear Clare Mcilwraith,

LEGISLATION: The Protection of Badgers Act 1992 (as amended)

DEVELOPMENT PROPOSAL AND LOCATION: Universal Theme Park Development, Bedford

SPECIES: European badger (*Meles meles*)

Thank you for your consultation in association with the above development site, received in this office on the 1st May 2025. This advice is being provided as part of charged-for Discretionary Advice between Natural England and WSP Limited. This response letter is intended to act as a Letter of Comfort to provide the relevant planning and consenting authorities and the Secretary of State with confidence that Natural England as the Licensing Authority sees no impediment to the issuing of a protected species licence, based on the information assessed to date and in respect of the proposed works.

WSP and UDX (Universal Destinations & Experiences) have asked Natural England to provide:

- A review of and written commentary on the ecological surveys, proposed mitigation and compensation relating to badgers as relevant to the proposed works for the development of the Universal Theme Park Development, Bedford.

The advice detailed in this response letter is based upon Natural England's review of the information within the following documents:

- UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT Environmental Statement Volume 3 Appendix 6.3 - Badger Survey Report CONFIDENTIAL April 2025
- UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT Environmental Statement Volume 3 Appendix 6.3 Figure 1 - Badger Overview Map_Rev5a 06/03/2025
- Project 320 Badger Bait Marking Survey, 08/05/2025. Prepared by: Cura Terrae Ltd.
- UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT Environmental Statement Volume 3 Environmental Statement Volume 3 Appendix 6.4: Outline Habitat Creation and Enhancement Plan (dated April 2025).
- UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT Environmental Statement Volume 3 Environmental Statement Volume 3 Appendix 6.5: Outline Landscape and Ecology Management Plan (OLEMP) March 2025

- UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT Environmental Statement Volume 3. Appendix 2.3 – Outline Construction Environmental Management Plan April 2025.
 - UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT Environmental Statement Volume 1, Chapter 6 – Ecology and Nature Conservation April 2025.
-

Review of Environmental Statement Documents

Following our assessment of the documents submitted to us for review, I write to confirm that, on the basis of the information and proposals provided, **Natural England sees no impediment to the required species mitigation licence being issued**, should the Special Development Order for the proposals be granted.

However, please note that the following issues that have been identified will need to be addressed in full as part of any formal licence application submitted to Natural England, to enable us as the Licensing Authority to grant the required licence. Please do ensure that a Method Statement and Application Form, along with any other documents as relevant and required, are completed in full to include these changes prior to formal submission.

For clarity, the issues that must be addressed are as follows:

Ecologist Experience:

A Named Ecologist has not yet been provided to Natural England as part of this assessment. Natural England will need to be satisfied that the proposed Named Ecologist has the relevant experience of the activities proposed to be licensed before we will be able to issue a licence.

Survey:

Natural England are broadly satisfied with the survey methods used, the data collected, and interpretations made to date. However, an updated survey must be conducted before a licence application is formally submitted to Natural England to confirm that the sett classifications and activity levels of the sett entrances have not changed since the previous surveys.

Natural England recommends providing additional maps/figures as part of the formal licence application. The maps should clearly show the setts that are proposed to be closed under licence. Each sett entrance must be shown and labelled as active, partially active or disused. Where setts have multiple entrances, each entrance must be numbered. The directions of sett tunnels must also be shown on the figures.

It would be useful to provide figures showing the final design of the scheme with the retained sett locations as well as the Artificial Badger Sett(s) highlighted to understand what the areas around the setts will look like when the development has been completed and to consider any post-development impacts to badgers.

Natural England advise providing recent photographs of the setts that are proposed to be closed under licence as part of the formal licence application. If the setts have multiple entrances, it may be beneficial to provide photos of all the entrances. This may be particularly helpful if there is uncertainty about whether the sett and/or entrances display signs of being in current use by a badger. Where setts have multiple entrances, the photographs should be numbered so that entrances can be identified from the figures showing the location of each sett entrance.

Impacts:

The setts to be closed under licence and the setts to be retained should be clearly described within the Method Statement, including appropriate detail and discussion on the potentially differing impacts to the two badger groups identified to date; the West Gateway group and the Lake Zone group. A

further and more detailed consideration of pre-, mid- and post-development impacts should also be included within the Method Statement.

Methodology:

Natural England would expect the exclusion of badgers from their setts to be completed using one-way gates. Natural England would expect full details of the sett closure methodology to be included in the Method Statement.

Mitigation:

The wildlife crossings as proposed should be provided as close as possible to the existing commuting routes used by the badger groups to be impacted. Consideration should also be given to the use of fencing to guide animals towards the crossing point to prevent road collisions and reduce badger mortality.

An indicative Construction Timetable should be included in the formal licence submission including where possible details of future phases and proposed future sett closures.

Compensation:

The artificial sett(s) proposed as compensation for the loss of main sett(s) should be located within affected social group's territory as confirmed by the bait marking survey. Where this is not possible full ecological justification for the artificial sett(s) location must be included in the formal licence application. The artificial badger sett(s) proposed should be of a size to reflect the importance and extent of the sett(s) to be lost.

Summary & Overall Comments

As detailed within the topic-specific comments above, Natural England is satisfied with the survey methods used, the data collected, and interpretations made to date, but, we would need to see further detail with respect to the impact, mitigation, and compensation proposals provided as part of the formal licence submission ahead of our granting the required licence.

However, the overall approach as put forward by WSP on behalf of UDX, alongside the wider commitment to adhere to standard best practice guidelines with respect to mitigation and compensation, provides Natural England with confidence that the outstanding issues as highlighted in this response will be addressed sufficiently, and as such, Natural England sees no likely impediment to the required species mitigation licence being issued, should the Special Development Order for the proposals be granted.

Further, Natural England would welcome the opportunity to continue to engage with WSP and UDX both during and after the Special Development Order consenting process to support and advise where appropriate on the preparation of the formal licence application documents ahead of their submission to Natural England for our statutory review and determination.

For clarification of anything in this letter, please contact [REDACTED]

☒ The advice provided in this letter has been through Natural England's Quality Assurance process.

The advice provided within this response letter is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision

which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

I hope the above information has been helpful; however, should you have any queries then please do not hesitate to contact me.

Yours sincerely,

[Redacted Signature]

Senior Officer (Senior Adviser) – National Delivery
Wildlife Licensing – Chargeable Advice and Strategic Casework
Natural England Wildlife Licensing Service

[Redacted Contact Information]

Date: 12 May 2025
Our ref: Universal Theme Park Development, Bedford
Your ref: Universal Theme Park Development, Bedford



BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business
Park
Electra Way
Crewe
Cheshire
CW1 6GJ

0300 060 3900

Dear Clare Mcilwraith,

LEGISLATION: Conservation of Habitats and Species Regulations 2017

DEVELOPMENT PROPOSAL AND LOCATION: Universal Theme Park Development, Bedford

SPECIES: UK Chiroptera (*Multiple spp.*)

Thank you for your consultation in association with the above development site, received in this office on the 1st May 2025. This advice is being provided as part of charged-for Discretionary Advice between Natural England and WSP Limited. This response letter is intended to act as a Letter of Comfort to provide the relevant planning and consenting authorities and the Secretary of State with confidence that Natural England as the Licensing Authority sees no impediment to the issuing of a protected species licence, based on the information assessed to date and in respect of the proposed works.

WSP and UDX (Universal Destinations & Experiences) have asked Natural England to provide:

- A review of and written commentary on the ecological surveys, proposed mitigation and compensation relating to bat species as relevant to the proposed works for the development of the Universal Theme Park Development, Bedford.

The advice detailed in this response letter is based upon Natural England's review of the information within the following documents:

- Universal Destinations & Experiences UK Project, Environmental Statement Volume 3, Appendix 6.10 – Bat Roost Appraisal Report (dated April 2025).
 - Environmental Statement Volume 3, Appendix 6.16 – Bat Activity Report (dated April 2025).
 - Environmental Statement Volume 3 Appendix 6.4: Outline Habitat Creation and Enhancement Plan (dated April 2025).
 - Environmental Statement Volume 1, Chapter 6 – Ecology and Nature Conservation (dated April 2025).
-

Review of Environmental Statement Documents

Following our assessment of the documents submitted to us for review, I write to confirm that, on the basis of the information and proposals provided, **Natural England sees no impediment to the required species mitigation licence being issued**, should the Special Development Order for the proposals be granted.

However, please note that the following issues that have been identified will need to be addressed in full as part of any formal licence application submitted to Natural England, to enable us as the Licensing Authority to grant the required licence. Please do ensure that a Method Statement and Application Form, along with any other documents as relevant and required, are completed in full to include these changes prior to formal submission.

For clarity, the issues that must be addressed are as follows:

Ecologist Experience:

A Named Ecologist has not yet been provided to Natural England as part of this assessment. Natural England will need to be satisfied that the proposed Named Ecologist has the relevant experience of the activities proposed to be licensed before we will be able to issue a licence.

Surveys

Natural England agrees with the methods for data collection and interpretation made regarding species presence, confirmed roost locations, and roost characterisation. However, these assessments may change if new information is obtained that alters the existing conclusions. Should this occur, Natural England would expect the appropriate amendments to the proposed mitigation and compensation strategy as required.

Please note for structures such as tree T182, currently recorded as a Potential Roosting Feature for low numbers or individual bats (PRF-I), and where bat use has not been ruled out, Natural England would expect to see consideration of this within the impacts Section D of the Licence Method Statement. This consideration should include an assessment of the species present and likely number of individual bats to be impacted, based on conclusive data, or, where this not available, on the professional judgement of the ecologist(s) submitting for the formal licence application.

Impacts & Mitigation:

Natural England requires a full and robust impact assessment to be provided as part of the formal licence application, with particular focus on the pre-, mid- and post-development impacts, and appropriate discussion of the direct impacts to individual bats and roosts. Details on how any novel impacts from the proposed theme park, for example the additional lighting impacts, will be mitigated for should be clearly set out, and relevant figures provided as necessary.

Compensation

Natural England would expect to see Like-for-Like compensation where possible for the loss of the brown long-eared and common pipistrelle hibernation roosts as recorded within the Guard House during survey work in February and early March 2025. As such, Natural England would usually expect the associated species roosts to be provided for by way of a structure that replicates observed or likely roosting features within the Guard House structure to be lost as closely as possible.

Should this not be possible for any reason, full justification for the use of bat boxes alone to compensate for impacts to and losses of hibernation (or maternity) roosts will be required for replacing these roost types, as the current onsite survey data results at present do not evidence existing hibernation roosting activity within treed (or bat boxes on trees) habitat onsite.

As stated in the survey comments section above, Natural England would expect to see mitigation and compensation in place for tree roosts characterised as being PRF-I where bat use has not been ruled out, due to the potential accumulative impacts from roost losses. As such, the compensation described for PRF-M (medium) should be applied to any trees classified as being PRF-I where the absence of bat use has not been confidently established.

As referenced in the impacts and mitigation comments previously, the expected increase in artificial lighting from the proposed development will undoubtedly reduce the nighttime darkness in and around the habitats that the impact bat populations will be utilising post-development. Any compensation proposals should be accompanied by supportive plans to demonstrate the effectiveness of such proposals to mitigate this increased lighting interference, and, their ability to maintain the integrity of and function of the associated natural habitats as bat roosting resources.

Summary & Overall Comments

As detailed within the topic-specific comments above, Natural England is satisfied with the survey methods used, the data collected, and interpretations made to date, but, we would need to see further detail with respect to the impact, mitigation, and compensation proposals provided as part of the formal licence submission ahead of our granting the required licence.

However, the overall approach as put forward by WSP on behalf of UDX, alongside the wider commitment to adhere to standard best practice guidelines with respect to mitigation and compensation, provides Natural England with confidence that the outstanding issues as highlighted in this response will be addressed sufficiently, and as such, Natural England sees no likely impediment to the required species mitigation licence being issued, should the Special Development Order for the proposals be granted.

Further, Natural England would welcome the opportunity to continue to engage with WSP and UDX both during and after the Special Development Order consenting process to support and advise where appropriate on the preparation of the formal licence application documents ahead of their submission to Natural England for our statutory review and determination.

For clarification of any points in this letter, please contact [REDACTED]

☒ The advice provided in this letter has been through Natural England's Quality Assurance process.

The advice provided within this response letter is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

I hope the above information has been helpful; however, should you have any queries then please do not hesitate to contact me.

Yours sincerely,

██████████

Senior Officer (Senior Adviser) – National Delivery
Wildlife Licensing – Chargeable Advice and Strategic Casework
Natural England Wildlife Licensing Service

██



Universal Destinations and Experiences UK Project

Summary of Agreed Position with Historic England

May 2025

1. INTRODUCTION

1.1. Purpose of this Agreed Position Summary

- 1.1.1. This Agreed Position Summary ("APS") has been prepared by Universal Destinations and Experiences ("UDX") and Historic England. For the purpose of this APS, UDX and Historic England will jointly be referred to as "the Parties". It presents those matters that have been agreed between the Parties with respect to the scope and methodology of the Cultural Heritage chapter and its associated appendices with confirmation that the assessment is regarded as proportionate and appropriate.
- 1.1.2. UDX 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.
- 1.1.3. 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 Entertainment Resort Complex (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 and processing facilities associated with the ERC; vehicle parking, maintenance and servicing; access routes and circulation spaces; landscaping; utility conveyance infrastructure; and use of land necessary to support construction.
- 1.1.4. The planning proposal also includes road and rail-related development including:
- a new slip road to provide access to and from the A421;
 - an expanded railway station on the Thameslink/Midland Main Line at Wixams;
 - improvements to Manor Road; and
 - improvements to certain other local roads.
- 1.1.5. 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.
- 1.1.6. It is intended that this APS will be submitted alongside the planning proposal documents to give a clear position of the state and extent of agreement between the Parties in relation to the scope and methodology of the Cultural Heritage chapter and appendices, as at the date on which this APS is signed.

2. MATTERS AGREED BETWEEN THE PARTIES

2.1. Introduction

- 2.1.1. The Parties are AGREED on all matters with respect to Cultural Heritage, as detailed below.
- 2.1.2. The Cultural Heritage topic (also known as the 'Historic Environment') is defined in ES Chapter 10.1 as 'known or potential buried heritage assets (archaeological and paleoenvironmental remains) and above ground heritage assets (structures and landscapes of heritage interest) within or immediately around the Proposed Development. It also includes, where appropriate, the setting of heritage assets scoped into the assessment, within and beyond the 5km study area, and how they are understood and appreciated'.
- 2.1.3. ES Chapter 10 provides an assessment of the environmental effects associated with this topic. The ES Chapter is supported by the following fully illustrated technical appendices:
- Appendix 10.1: Historic Environment Desk-Based Assessment (Volume 3).
 - Appendix 10.2: Archaeological Trial Trench Evaluation Report (Volume 3).
 - Appendix 10.3: Draft Archaeological Mitigation Strategy (Volume 3).
- 2.1.4. ES Chapter 10 Table 10.1 provides a summary of the consultation undertaken with Historic England. Historic England provided comments on draft versions of ES Chapter 10 and these three technical appendices in a letter of 27 September 2024. Comments have been addressed in the current versions of these documents.

Basis of Assessment

- 2.1.5. The parties are AGREED on the project description as set out in Chapter 2: Description of Proposed Development (Environmental Statement (ES Volume 1) and Appendix 2.1: Environmental Statement Basis of Assessment (ES Volume 3) and AGREED that this is an appropriate basis for assessment.

2.2. Assessment methodology

Scope and Study Area

- 2.2.1. In order to determine the full historic environment potential of the Site, a broad range of standard documentary and cartographic sources, including results from any archaeological investigations in the Site and a 500m radius study area around it were examined in order to determine the likely nature, extent, preservation and significance of any known or possible heritage assets that may be present within or adjacent to the Site.
- 2.2.2. For above ground heritage assets, in order to provide historic environment background context for the Site and to inform the assessment of setting, a broad range of standard digital, documentary and cartographic sources and a 5km Site boundary radius was used. All designated heritage assets within the 5km study area were included in the desk-based assessment.
- 2.2.3. The 5km study area is intended as a guide. A number of assets, including those of the highest significance (such as scheduled monuments, and Grade I and Grade II* listed buildings) beyond this study area were also included on a case-by-case basis where appropriate, e.g., where such assets are highly graded and/or where they contribute to current understanding of the historic environment.
- 2.2.4. The extent of the study area and the assets scoped into the assessment, both within and beyond the 5km study area, were defined using expert professional judgement, and informed by the results of the site

visits, as well as by liaison with the Landscape team, utilisation of the Zones of Theoretical Visibility (ZTV), and reference to Chapter 7: Landscape and Visual Impact Assessment (ES Volume 1) and Appendix 7.1: Technical Methodology: Photography, 3D Modelling, Accurate Visual Representations (ES Volume 3). Reference is also made to Chapter 9: Noise and Vibration (ES Volume 1), Appendix 9.2: Construction Noise and Vibration Assessment (Volume 3) and Appendix 9.4: Operational Noise Assessment (ES Volume 3). Consultation was also carried out with statutory consultees.

2.2.5. This approach was AGREED.

Assessing Heritage Significance

2.2.6. The NPPF defines significance as 'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic.' The determination of the significance is based on statutory designation and/or professional judgement against these values (consideration has also been given to the Historic England Advice Note 12 - "Statement of Heritage Significance: Analysing Significance in Heritage Assets"). Each asset is evaluated on a case-by-case basis against the range of criteria listed in Table 4 of ES Chapter 10 and Table 3-2 of ES Appendix 10.1 Historic Environment Desk-Based Assessment (Volume 3). The assessment considers the contribution which the historic character and setting makes to the overall significance of the asset.

2.2.7. Table 4 of ES Chapter 10 and Table 3-2 of ES Appendix 10.1 Historic Environment Desk-Based Assessment (Volume 3) gives examples of the significance of designated and non-designated heritage assets. However, this table is only intended as a guide.

2.2.8. This approach was AGREED.

Scoping heritage assets

2.2.9. In line with step 1 of the Historic England settings guidance (Historic England - Good Practice Advice in Planning Note 3 - The Setting of Heritage Asset, 2017), section 6.1 (Table 3) of ES Appendix 10.1 Historic Environment Desk-Based Assessment (Volume 3) provides the rationale for why heritage assets were scoped out within the 5km study area, as their significance would not be affected at all by the Proposed Development, in terms of material changes to their setting and how the asset is understood and appreciated. This is based on the distance of the asset from the Site; the asset's location, scale and orientation, and the nature, extent and scale of intervening-built form, vegetation and topography between asset and the Site. The designated heritage assets were scoped out using professional judgement, and the results of the site visits, as well as by liaison with the Landscape team, utilisation of the Zones of Theoretical Visibility (ZTV), and reference to Chapter 7: Landscape and Visual Assessment (Volume 1), Appendix 7.1: Technical Methodology: Photography, 3D Modelling, Accurate Visual Representations (Volume 3). Reference is also made to Chapter 9: Noise and Vibration (Volume 1), Appendix 9.2: Construction Noise and Vibration Assessment (Volume 3) and Appendix 9.4: Operational Noise Assessment (Volume 3).

2.2.10. This approach was AGREED.

Archaeological trial trench evaluation

2.2.11. The extensive archaeological trial trench evaluation undertaken in 2024 with results presented in Appendix 10.2: Archaeological Trial Trench Evaluation Report (ES Volume 3), was undertaken in accordance with the scope and methodology set out in a Written Scheme of Investigation WSI (WSP/AOC 2024). The WSI incorporated a number of comments from Historic England (Regional Director (East of England) email to the Client team on 12 March 2024) and was subsequently approved

by the Bedford Borough Council Archaeological Advisor. The WSI has not been submitted as a separate EIA appendix as the salient contents with respect to scope and method are contained within Appendix 10.2: Archaeological Trial Trench Evaluation Report (ES Volume 3).

2.2.12. This approach to the evaluation was AGREED.

2.3. Assessment of Environmental Effects

Effects during Construction

2.3.1. The assessment of Cultural Heritage impacts during construction is presented in ES Chapter 10 Section 10.7. Table 10-8 deals with Assessment of Construction Phase effects. The assessment reports temporary residual moderate adverse effects (at the upper range of less than substantial harm) to the following designated heritage assets. As the impacts and effects are temporary, the assets are grouped in the ES chapter, but are noted in full here for ease of reference:

- Kempston Hardwick moated site (scheduled).
- Assets in Ampthill: Houghton House (scheduled and listed Grade I); Ampthill Castle (scheduled); Ampthill Park (Grade II registered park and garden); Ampthill Conservation Area; Park House (listed Grade II*), Katherine's Cross (listed Grade II).
- Assets in Wootton: Wootton Conservation Area; Parish Church of St Mary the Virgin (listed Grade I); Wootton House (listed Grade II*); Former Stables to Wootton House (listed Grade II); Old Bakehouse No. 23 and 25, Church Road (listed Grade II); Nos. 21 and 23, Church Row (listed Grade II); Wootton War Memorial (listed Grade II); The Old Post Office (listed Grade II); No. 7, Church Road (listed Grade II); Nos. 2-8, Church Road (listed Grade II); Nos. 3 and 5, Cranfield Road (listed Grade II).
- Assets in Stewartby: Stewartby Conservation Area (including landmark buildings within its boundary); Sir Malcolm Stewart Trust Homes (listed Grade II); Sir Malcolm Stewart Trust Common Room (listed Grade II).
- Church of All Saints, Houghton Conquest (listed Grade I).
- Assets in Elstow: Elstow Conservation Area; Elstow Manor House (Remains of) (scheduled) and Hillersdon Mansion (listed Grade I); Parish Church of St Mary and St Helena (listed Grade I); Parish Church Tower (listed Grade I).

2.3.2. The Proposed Development does not result in substantial harm to any designated heritage assets during Construction Phase.

2.3.3. Section 10.6 (table 7) of the ES notes that Annex 2 of ES Appendix 10.1 Historic Environment Desk-Based Assessment (Volume 3) presents impacts to designated heritage assets not at the upper range of less than substantial harm. These assets comprise scheduled monuments, Grade I listed buildings, Grade II* listed buildings, Grade II listed buildings, a Grade I registered park and garden, a Grade II registered park and garden, and a conservation area.

2.3.4. This approach was AGREED.

2.3.5. ES Chapter 10 provides an assessment of the Construction Phase effects on the scheduled monument of Kempston Hardwick, a medieval moated site which lies outside the Site extent, approximately 30 meters from proposed construction activities. The asset is of high heritage significance. Setting makes a medium contribution to significance. The assessment establishes that this heritage asset is on is located on solid geology and not superficial deposits and will not be subject to any hydrological changes that might take place within the Site. Vibration and water levels have been considered, and this is included in ES Table 10.8.

- 2.3.6. Kempston Hardwick moated site is set back from the road and is not located on 'soft' deposits, such as alluvium, which alleviates concerns regarding ground instability and ensures the asset's stability. The Moat is located outside of the Site Boundary and is not hydraulically linked with existing or proposed surface water systems (Table 12.3 (as found in ES Chapter 12: Water Resources (Volume 1)); Figure 12.2 Risk of Flooding From Surface Water (Volume 2) and Figure 12.1 Risk of Flooding From Rivers (Volume 2)). The stable, impermeable geology and planned activities are designed to maintain hydrological stability, ensuring no changes to groundwater conditions, as there are no elements of the construction proposals that would alter the baseline conditions from this perspective.
- 2.3.7. The asset will not experience direct physical impacts from vibration. The vibration assessment for piling and vibratory rollers (Appendix 9.2: Construction Noise and Vibration Assessment (Volume 3)) have evaluated that at a distance of 30m, the asset will experience a predicted maximum of 2.4mm/s peak particle velocity (PPV) from vibratory rollers and 5.8mm/s PPV from piling. British Standard BS 5228-2 gives a guideline value of 15mm/s PPV at a frequency of 4Hz as the minimum level that would result in cosmetic damage to light-framed, unreinforced above-ground structures. The proposed piling is unlikely to generate vibrations at frequencies as low as 4Hz. Values of <6mm/s PPV would not be significant for above ground structures. A further consideration is that structural remains that might survive below ground and encased in soil, e.g. foundations, would be less susceptible to damage than above ground structures. The risk of damage due to piling vibration at the predicted levels is therefore considered negligible. Monitoring of the piling is nevertheless proposed. As identified in Appendix 2.3: Outline Construction Environmental Management Plan (Volume 3), it is recommended that ground borne vibration from construction related activities is limited to no more than 2mm/s peak particle velocity (PPV) at the monument, reflecting both the sensitive nature of the asset and unknowns regarding its structural integrity. Should vibration levels approach this threshold, a strict monitoring program and a comprehensive Piling Risk Assessment will be required which shall take into account the above proposed vibration limit.
- 2.3.8. With respect to impacts to significance due to changes in setting and how the asset is understood and experienced, the cautious worst case scenario regarding construction estimates five-year Primary Phase construction, and the Peak Construction Year. Whilst phased and temporary, due to the proximity of the asset to the Site, the Proposed Development will introduce a new and temporary (medium-term) visually intrusive built form into the immediate setting of the asset (e.g., construction infrastructure, such as cranes), as well as introducing other impacts from lighting, noise, vibration, traffic, and dust resulting a direct, temporary, medium-term effect of moderate adverse significance (significant). In National Planning Policy Framework (NPPF) terms this is in the upper range of 'less than substantial harm'.
- 2.3.9. This assessment of effects during Construction was AGREED.

Effects during Operation

- 2.3.10. The assessment of Cultural Heritage impacts during operation is presented in Chapter 10 Sections 10.7 of the ES. Table 10-9 deals with Assessment of Operational Phase effects.
- 2.3.11. Section 7.3 (Table 7-1) of ES Appendix 10.1 Historic Environment Desk-Based Assessment (Volume 3) presents significant impacts to designated heritage assets. These are assessed in NPPF terms at the upper range of less than substantial harm (moderate adverse in ES terms). These assets comprise:
- Kempston Hardwick moated site (scheduled).
 - Assets in Ampthill: Houghton House (scheduled and listed Grade I); Ampthill Castle (scheduled); Ampthill Park (Grade II registered park and garden); Ampthill Conservation Area; Park House (listed Grade II*), Katherine's Cross (listed Grade II).

- Assets in Wootton: Wootton Conservation Area; Parish Church of St Mary the Virgin (listed Grade I); Wootton House (listed Grade II*); Former Stables to Wootton House (listed Grade II); Old Bakehouse No. 23 and 25, Church Road (listed Grade II); Nos. 21 and 23, Church Row (listed Grade II); Wootton War Memorial (listed Grade II); The Old Post Office (listed Grade II); No. 7, Church Road (listed Grade II); Nos. 2-8, Church Road (listed Grade II); Nos. 3 and 5, Cranfield Road (listed Grade II).
- Assets in Stewartby: Stewartby Conservation Area (including landmark buildings within its boundary); Sir Malcolm Stewart Trust Homes (listed Grade II); Sir Malcolm Stewart Trust Common Room (listed Grade II).
- Church of All Saints, Houghton Conquest (listed Grade I).
- Assets in Elstow: Elstow Conservation Area; Elstow Manor House (Remains of) (scheduled) and Hillersdon Mansion (listed Grade I); Parish Church of St Mary and St Helena (listed Grade I); Parish Church Tower (listed Grade I).

2.3.12. The Proposed Development does not result in substantial harm to any designated heritage assets during Operation Phase.

2.3.13. Annex 2 of ES Appendix 10.1 Historic Environment Desk-Based Assessment (Volume 3) presents impacts to designated heritage assets not at the upper range of less than substantial harm. These assets comprise scheduled monuments, Grade I listed buildings, Grade II* listed buildings, Grade II listed buildings, a Grade I registered park and garden, a Grade II registered park and garden, and a conservation area.

2.3.14. This approach was AGREED.

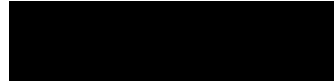
MATTERS YET TO BE AGREED BETWEEN THE PARTIES

The Parties confirm that the following areas are NOT YET AGREED by the Parties::

None.

This APS is prepared jointly and agreed by the parties.

Signed by



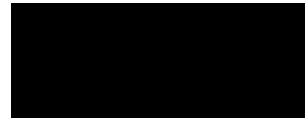
For and behalf of UDX



Senior Vice President, External Affairs

Date: 14th May 2025

Signed by



For and behalf of Historic England

, Director of Regions

Date: 13th May 2025



Universal Destinations & Experiences UK Project

Summary of Agreed Position with the Health and Safety Executive

May 2025

1. INTRODUCTION

1.1. Purpose of this Agreed Position Summary

- 1.1.1. This Agreed Position Summary ("APS") has been prepared by Universal Destinations and Experiences ("UDX") and the Health and Safety Executive ("HSE"). For the purpose of this APS, UDX and HSE will jointly be referred to as "the Parties".
- 1.1.2. UDX 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.
- 1.1.3. 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 Entertainment Resort Complex (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 and processing facilities associated with the ERC; vehicle parking, maintenance and servicing; access routes and circulation spaces; landscaping; utility conveyance infrastructure; and use of land necessary to support construction.
- 1.1.4. The planning proposal also includes road and rail-related development including:
- a new slip road to provide access to and from the A421;
 - an expanded railway station on the Thameslink/Midland Main Line at Wixams;
 - improvements to Manor Road; and
 - improvements to certain other local roads.
- 1.1.5. 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.
- 1.1.6. Overall, it is intended that this APS will be submitted alongside the planning proposal to give a clear position of the state and extent of agreement between the Parties as at the date on which this APS is signed.

1.2. HSE's planning role and major hazards.

- 1.2.1. HSE has a dual role as a statutory consultee in the planning system.
- The Planning (Hazardous Substances) Act 1990 and subsequent Planning (Hazardous Substances) Regulations require that a 'hazardous substances consent' for the presence on, over or under land of certain hazardous substances in amounts at or above specified controlled quantities is obtained from the local Hazardous Substances Authority (HSA) before hazardous material is present. HSE's role as a statutory consultee is to provide public safety advice to the

Hazardous Substances Authority on the potential major accidents that may impact existing and planned populations nearby. The relevant government guidance is at [Hazardous substances - GOV.UK](https://www.gov.uk/government/guidance/hazardous-substances).

- Once a 'Hazardous Substances Consent' is granted by the HSA, HSE issue a set of consultation zones derived from a technical risk assessment of the hazards and risks from the stored hazardous material. This leads to its second statutory consultee role for HSE. That is to provide public safety advice to the planning decision makers on certain development proposed within the consultation distances. In England it is the Town and Country Planning (Development Management Procedure) (England) Order 2015 that enables this.
- HSE's advice is aimed at limiting the consequences to people in the event of a major accident. The advice is based on a published methodology [HSE: Land use planning - HSE's land use planning methodology](#). The advice makes use of the information at the planning stage of the proposed development and the location with respect to the three consultation zones around a site with Hazardous Substances Consent (and major accident hazard pipelines).

- 1.2.2. HSE is also a statutory consultee for proposed developments within the safeguarding distances of licensed explosives sites.
- 1.2.3. Operational major hazard sites are subject to the Control of Major Hazard Regulations 2015 and regulated by a joint competent authority of the Environment Agency and HSE.

2. MATTERS AGREED BETWEEN THE PARTIES

2.1.1. The Parties are AGREED on the following points:

2.2. Existing Potential Hazards

2.2.1. Figure 2.1 below, shows the location and consultation zones for three separate sites with extant Hazardous Substances Consents:

- Asda LNG Storage facility at Woburn Road, Kempston, Bedford
- Veolia ES (UK) Ltd on Green Lane, Stewartby
- Hanson Brick Ltd, Stewartby, Bedford
- K Watson Ltd, Wilstead Industrial Park, Bedford.

2.2.2. The Asda LNG storage facility (LNG – Liquefied Natural Gas) holds a hazardous substances consent to store notifiable quantities of LNG and is located adjacent to the west of the Lake Zone. As illustrated in Figure 2.1, the inner, middle and outer consultation zones associated with this facility overlap the Site boundary. UDX has undertaken a review of the HSE's land use planning methodology to understand the types of development that would be appropriate within this area.

2.2.3. Veolia ES (UK) Ltd on Green Lane, Stewartby is located approximately 730m southeast of the closest point of the Site boundary along the A421 and approximately 1km southwest of the Core Zone. The consultation zones associated with the Veolia facility do not overlap the Site boundary. Therefore, the potential risks associated with the presence of this facility have not been further assessed. This site is an active operational lower tier Control of Major Accident Hazard (COMAH) establishment.

2.2.4. Hanson Brick Ltd. has an extant HSC for liquefied petroleum gas. The zones do not overlap the site boundary and therefore have not been considered further.

2.2.5. K Watson Ltd have hazardous substances consent for LPG. The zones do not overlap the site boundary and therefore have not been considered further.

Figure 2.1 - HSE Consultation Zones



2.3. Restrictions on future development

Sites with Hazardous Substance Consent

- 2.3.1. Meetings were held on 9 May 2024 and 1 May 2025 with HSE. During those meetings the Parties discussed and confirmed the potential risks associated with the three sites.
- 2.3.2. The only site with consultation zones that impact the red line area of the proposed development is the Asda LNG storage facility.
- 2.3.3. The HSE highlighted that the main potential risk associated with the presence of the LNG facility is fire and explosion. In addition, if releases remain unignited, there is a low risk of asphyxiation. The consultation zones around the LNG storage facility have been defined by the HSE to control inappropriate new development adjacent to the facility with the objective of mitigating the consequences to people in the event of a major accident.
- 2.3.4. The following is AGREED by the Parties:
 - (a) The type, size and intensity of buildings in the Lake Zone shall comply with the HSE's Land Use Planning Methodology (following consultation with HSE) to ensure that the risks associated with the existing LNG facility at Asda, Marsh Leys Cottages, Farm Woburn Rd, Kempston, Bedford MK43 9AB is appropriately considered. Any Zonal Masterplan, Zonal Design Standards, or Detailed Approval falling within the HSE consultation zones shall be accompanied by confirmation of HSE's Land Use Planning advice as set out in Design Standard [LZ2.1] (document reference 6.3.0).

(b) As set out in Design Standard [LZ2.2] unless the hazardous substance consent is revoked, or there is a change in the HSE Land Use Planning Methodology which suggests otherwise, notwithstanding the above, the following uses shall not be permitted within the consultation zones of the existing LNG storage facility at the adjacent ASDA chilled distribution centre:

- No Sensitivity Level 2,3 or 4 development as defined within the HSE Land Use Planning Methodology should be located within the inner consultation zone;
- No Sensitivity Level 3 or 4 developments should be located within the middle consultation zone
- No Sensitivity Level 4 developments should be located within the outer consultation zone
Prior to finalising the design of the Lake Zone the Undertaker would seek land use planning advice from the HSE to ensure that any development in the consultation zones is appropriate.

Use of Fireworks and Pyrotechnic Articles

2.3.5. The storage and use of fireworks and pyrotechnics will be undertaken in accordance with existing regulatory requirements.

2.3.6. Storage of pyrotechnics will comply with the Explosives Regulations 2014 and the relevant HSE guidance:

- Explosive Regulations 2014: Guidance on Regulations – Safety provisions L150;
- Explosives Regulations 2014: Guidance on Regulations – Security provisions L151; and
- Explosives Regulations 2014: Guidance on Regulations – Professional firework display operators;

and any relevant updates thereof.

2.3.7. The pyrotechnics stored on Site will hold approximately one month's requirement for typical daily use of the products within the theme park. The quantity of explosives stored will be between no more than 3000 – 4000kg (though may be less from time to time) and will be subject to an HSE licence. Facilities intended to facilitate the safe assembly and fusing of displays will also be provided. Separation distances between the storage location and other buildings will be expected to meet Schedule 5 of the Explosives Regulations 2014 or as determined by HSE as part of the grant of the licence.



This APS is prepared jointly and agreed by the parties.

Signed by

[Redacted signature]

Senior Vice President, External Affairs

[Redacted signature]

For and behalf of UDX

Date: 14th May 2025

Signed by

[Redacted signature]

, HM Principal Specialist Inspector

[Redacted signature]

For and behalf of HSE

Date: ..14th May 2025

A UNIVERSAL DESTINATIONS AND EXPERIENCES UK PROJECT

Summary of Agreed Position

WATER RESOURCES

SUMMARY OF AGREED POSITION BETWEEN UNIVERSAL DESTINATIONS &
EXPERIENCES AND ANGLIAN WATER

19TH JUNE 2025

1. INTRODUCTION

Purpose of this Summary of Agreed Position

- 1.1. This SoAP has been prepared by Universal Destinations & Experiences (“UDX”) and Anglian Water (“AW”). For the purpose of this SoAP, UDX and AW will jointly be referred to as “the Parties”.
- 1.2. For the avoidance of doubt nothing contained in this summary of agreed position should be construed as approval of a solution or a contract between UDX or AW (or between UDX and any NAV, SLO, (each as defined below) or water retailer appointed by UDX).
- 1.3. UDX will include suitably worded controls within a Dependencies Table and an Environmental Controls document which will be submitted with the planning proposal. UDX will propose in the submission that these be the subject of planning conditions which will require compliance with them to ensure:
 - 1.3.1. no connections to AW’s water network are made until delivery of the required water infrastructure is operational, other than connections for near term or temporary services, for which connections may be made to existing water mains adjacent to or within the Site to the extent there is capacity in the system, subject to published infrastructure charging rates;
 - 1.3.2. no connections to AW’s wastewater network (save for connections to existing foul water infrastructure, to the extent there is capacity) are made until delivery of the required wastewater infrastructure is operational;
 - 1.3.3. the management of surface water in line with the surface water hierarchy;
 - 1.3.4. the collection of water for reuse and at source surface water reduction; and
 - 1.3.5. a restriction of connections to the AW network for surface water disposal.
- 1.4. Definitions used throughout the Summary of Agreed Position (“SoAP”):
 - a) **Potable Water:** Wholesome water suitable for human consumption.
 - b) **Non-Potable Water (NPS):** Water unsuitable for human consumption. i.e. rainwater harvesting system.
 - c) **Domestic sewerage:** sewerage required to be treated at a Wastewater Treatment Plant.
 - d) **Foul Water:** can include domestic sewerage and discharge from other sources.
 - e) **Surface Water Drainage:** rainwater.
- 1.5. The parties will continue to work constructively in order to deliver potable water and sewerage services to UDX.
- 1.6. UDX 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.
- 1.7. 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.

- 1.8. The planning proposal also includes road and rail-related development including:
 - a new slip road to provide access to and from the A421;
 - an expanded railway station on the Thameslink/Midland Main Line at Wixams;
 - improvements to Manor Road; and
 - improvements to certain other local roads.
- 1.9. 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.
- 1.10. Preparation of this SoAP has been informed by a programme of discussions between the Parties. The purpose of this SoAP is to set out agreed information about the Proposals.
- 1.11. This SoAP is referred to as "WATER RESOURCES" and relates to Potable Water Supply, NPS, and Foul Water drainage including trade effluent and Surface Water Drainage.
- 1.12. This summary note contains the key principles for the sustainable Water Resources Strategy for the UDX UK Project at the Site.
- 1.13. This note also summarises the outcomes of consultations with AW on the UDX project needs for the site since January 2024 to date.
- 1.14. UDX is committed to sustainable water management practices within ERC by reducing the use of potable water, reusing and treating water where appropriate and exploring the feasibility of reducing foul water discharge into the network, as set forth in the Water Resources Strategy.
- 1.15. UDX has consulted with AW during 2024 and 2025 and discussed principles and approach for Water Resources. UDX submitted a pre-planning application in January 2024 to AW which was returned in April 2024 confirming availability of potable water, the requirement to pay for infrastructure charges and the constraints of Bedford Water Recycling Centre (WRC) for foul water discharge.
- 1.16. The key principles are based on assumptions. AW has not undertaken detailed assessments and UDX continues to undertake feasibility studies which are being assessed and finalised. No formal agreements have taken place between the Parties.
- 1.17. Designs for Water Resources will be developed to deliver on the commitments made once planning approval is granted and the detail of the site layout is fixed. Without prejudice to paragraphs 2.1.3 and 2.2, until the detailed design for the ERC project can be shared it is acknowledged that AW cannot confirm costs and programme. The Development Zones are shown in Figure 1 for reference.
- 1.18. Overall, this SoAP is intended to give a clear position of the state and extent of agreement between the Parties as at the date on which this SoAP is signed and submitted to the Secretary of State for Housing, Communities and Local Government.

- 1.19. Within this SoAP the term “inchoate” means unfinished, indicative or approximate based on initial high-level desktop studies, subject to further analysis and negotiation, feasibility studies and detailed design and not yet defined.
- 1.20. The contestable works portion of the potable water and wastewater connection infrastructure could be installed by a Self-Lay Provider (“SLP”) or Anglian Water. The assets can be adopted by a newly appointed water and wastewater undertaker (“NAV”) or by Anglian Water. In this SoAP, each point of connection between the AW infrastructure and the NAV last-mile infrastructure is referred to as an “AW/NAV Connection Point”.

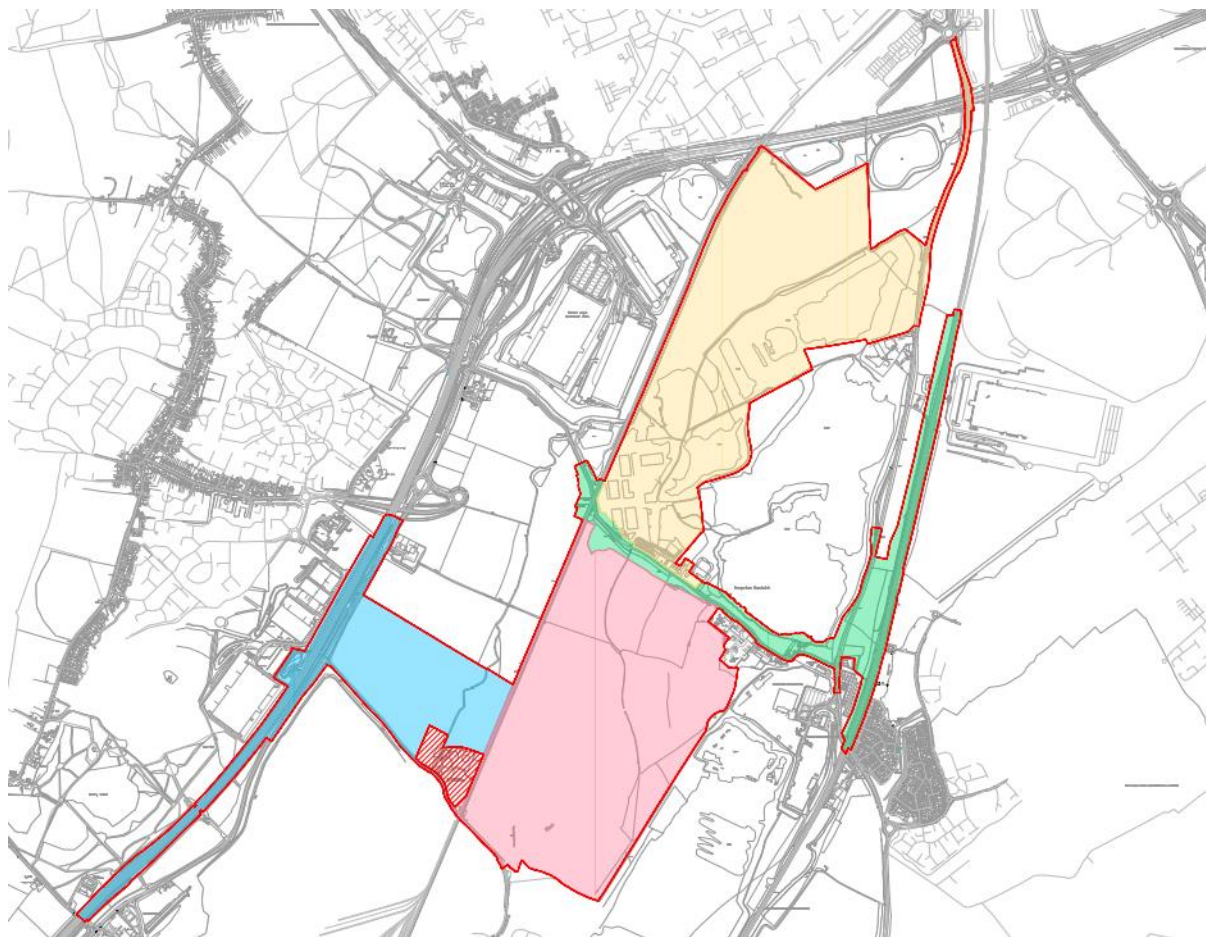


Figure 1 - Zonal Plan

Legend

- Site Boundary
- Excluded from Site Boundary
- Core Zone
- Lake Zone
- East Gateway Zone
- West Gateway Zone

2. MATTERS AGREED BETWEEN THE PARTIES

The Parties are AGREED on all matters, excluding those outlined in Section 3 below, and in particular are AGREED on the following points:

UDX is assessing the most suitable option to carry out all 'contestable' works for Potable and Foul Water which include routing for the connections, which may be via a Self-Lay provider.

2.1. Potable Water Supply Strategy

Permanent potable water supply

2.1.1. The Potable Water demand from the park is driven by:

- **Domestic water uses** – associated with guests' hospitality (including day and overnight stay), water re-fill points and employees welfare facilities;

2.1.2. UDX is currently assessing the phased Potable Water requirements for ERC. It is understood that the final design solution for the connection routes and points are inchoate awaiting further investigation and design development.

2.1.3. The Parties have discussed the need for additional 'resilience' for the domestic potable water requirements which final design solution is inchoate awaiting further investigation and design development.

Temporary potable water supply

2.1.4. UDX is currently assessing the requirement for the temporary building supplies. Both Parties will work together to understand need dates and means to supply.

Non-potable water supply

2.1.5. As part of UDX commitment to sustainable water management an assessment is currently being undertaken for water supplies associated with non-domestic uses such as irrigation and process water (park washdown and supply to water features) to be supplied from on-Site water resources utilising an on-Site non-potable water treatment works.

2.2. Foul Water Drainage Strategy

2.2.1. The domestic foul water drainage requirement for the UDX UK Project is currently being assessed. AW anticipates providing connection point(s) to the foul water network and will continue to work with UDX regarding flow rates and loadings.

2.2.2. The final point of connection location and connection strategy is awaiting further investigation and design development.

2.2.3. The delivery of the proposed foul water terminal pumping station located in the Lake Zone and the off-Site foul water rising main to the point of connection is currently being assessed for it to be undertaken by a self-lay provider, with connection and delivery strategies to be determined and agreed.

Trade Effluent

2.2.4. AW provided a letter of assurance dated 17 April 2024 relating to Water Supply, Effluent Collection and Treatment. Wastewater generated by the proposed on-Site non-potable water treatment works, including backwash water from the filtration process and closed-loop systems will be discharged to the AW sewer network. This will be subject to a Trade Effluent Consent between AW and UDX.

2.2.5. Sludge from the on-Site water treatment process is likely to be stored and tankered to an AW disposal site.

However, alternative options will be considered.

The routings of any off-site foul water connections are inchoate and are still to be properly determined.

Surface Water Drainage

2.2.6. In accordance with UDX Surface Water Strategy all surface water will be either collected for reuse or discharged into existing water courses.

- 2.3. The installation of the potable water supply and foul water drainage connections and any upgrades deemed necessary by AW to existing AW infrastructure can be delivered by AW using AW's statutory powers and permitted development rights or, where applicable, another regulated provider's statutory power, to the extent permitted development rights are not available planning permission will be sought.
- 2.4. With its planning proposal, UDX will submit an Environment Statement (ES) which will include a surface water, drainage and flood risk strategy prepared in consultation with Anglian Water and key stakeholders as per current regulatory requirements.
- 2.5. AW will meet all requirements of a domestic nature for both water supply and the collection and treatment of effluent and will work with UDX on the volume and timing of requirements so that AW can appropriately design and construct the supporting infrastructure for the UDX UK Project.
- 2.6. UDX agrees to enter a mutually agreeable enabling agreement (which will set out consultancy arrangements for design) that will define the scope of all project requirements along with cost and delivery responsibilities of each party for contestable and non-contestable works (the "Enabling Agreement"). Notwithstanding the terms of the Enabling Agreement, UDX shall have the right to choose other options for providing either domestic water or foul water services through other licensed providers.
- 2.7. Any non-contestable works agreed to be funded by UDX will be subject to a mutually agreeable Special Agreement.

3. MATTERS YET TO BE AGREED BETWEEN THE PARTIES

The Parties confirm that the following areas are TO BE AGREED by the Parties:

- 3.1. Following planning consent the Parties will work collaboratively to establish the demand profile and delivery strategy in line with UDX programme.
- 3.2. The final connection strategy and any potential route options to the Site are to be determined following further investigation and design development.
- 3.3. Following planning consent route identification will be carried out by UDX in conjunction with AW taking into account a range of factors. Additional surveys and investigation will be undertaken to identify preferred routes for both Potable Water and Foul Water and support the design development and detail of selected final routes. As such all routing is currently, and will remain, inchoate awaiting further investigation and design development.
- 3.4. Exact locations and connection details for temporary building supplies to be provided by AW in 2025 are to be determined and agreed.

This SoAP is prepared jointly and agreed by the parties, and based on AW's current understanding of the ERC, there is no known restriction for the WATER RESOURCES to be in place prior to the Promoters operation of the Proposed Development.

Signed by
For and behalf of UDX

SVP External Affairs

Signed by:

Date: 6/19/2025

Signed by
For and behalf of AW

Head of Strategic Asset Planning

Signed by:

Date: 6/19/2025



Universal Destinations & Experiences UK Project

Summary of Agreed Position with Cranfield Airport

April 2025

1. INTRODUCTION

1.1. Purpose of this Agreed Position Summary

- 1.1.1. This Agreed Position Summary ("APS") has been prepared by Universal Destinations and Experiences ("UDX") and Cranfield Airport. For the purpose of this APS, UDX and Cranfield Airport will jointly be referred to as "the Parties".
- 1.1.2. UDX 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.
- 1.1.3. 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 and processing facilities associated with the ERC; vehicle parking, maintenance and servicing; access routes and circulation spaces; landscaping; utility conveyance infrastructure; and use of land necessary to support construction.
- 1.1.4. The planning proposal also includes road and rail-related development including:
- a new slip road to provide access to and from the A421;
 - an expanded railway station on the Thameslink/Midland Main Line at Wixams;
 - improvements to Manor Road; and
 - improvements to certain other local roads.
- 1.1.5. 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.
- 1.1.6. Overall, it is intended that this APS will be submitted alongside the planning proposal to give a clear position of the state and extent of agreement between the Parties as at the date on which this APS is signed.
- 1.1.7. Notwithstanding other relevant civil aviation regulation, this APS has been prepared with consideration of The Town and Country Planning (safeguarding aerodromes, technical sites and military explosives storage areas) Direction (2002) (the 'Consultation Direction'), Civil Aviation Publication (CAP) 738 'Safeguarding of Aerodromes' (2020) and CAP 793 Safe Operating Practices at Unlicensed Aerodromes (2010).

2. MATTERS AGREED BETWEEN THE PARTIES

2.1.1. The Parties are AGREED on all matters, as set out below.

2.2. Cranfield Airport

- 2.2.1. Cranfield Airport holds a Civil Aviation Authority (CAA) licence, confirming its facilities meet prescribed safety criteria, which allows for certain types of aircraft to operate from the aerodrome.
- 2.2.2. The aerodrome does not benefit from the Consultation Direction, as it is not officially safeguarded. However, in line with aerodrome safeguarding guidance, Cranfield Airport has produced a safeguarding map, and this map has been deposited with Bedford Borough Council.
- 2.2.3. Safeguarding maps are colour coded and site-specific, designed to indicate to a planning authority those types of development upon which consultation is required. Its purpose is to ensure that an aerodrome's safe and efficient operations are not inhibited by other proposed buildings, structures or constructions coming forward which might infringe the established obstacle limitation surfaces, obscure runway approach lights or have the potential to impair the performance of aerodrome navigation aids, radio aids or telecommunication systems.
- 2.2.4. Cranfield Airport is located approximately 5.7km south-west of the closest point of the Site boundary (distance taken from the aerodrome reference point). Aircraft approaching from the north to land at the airport, do not currently fly over the Site.

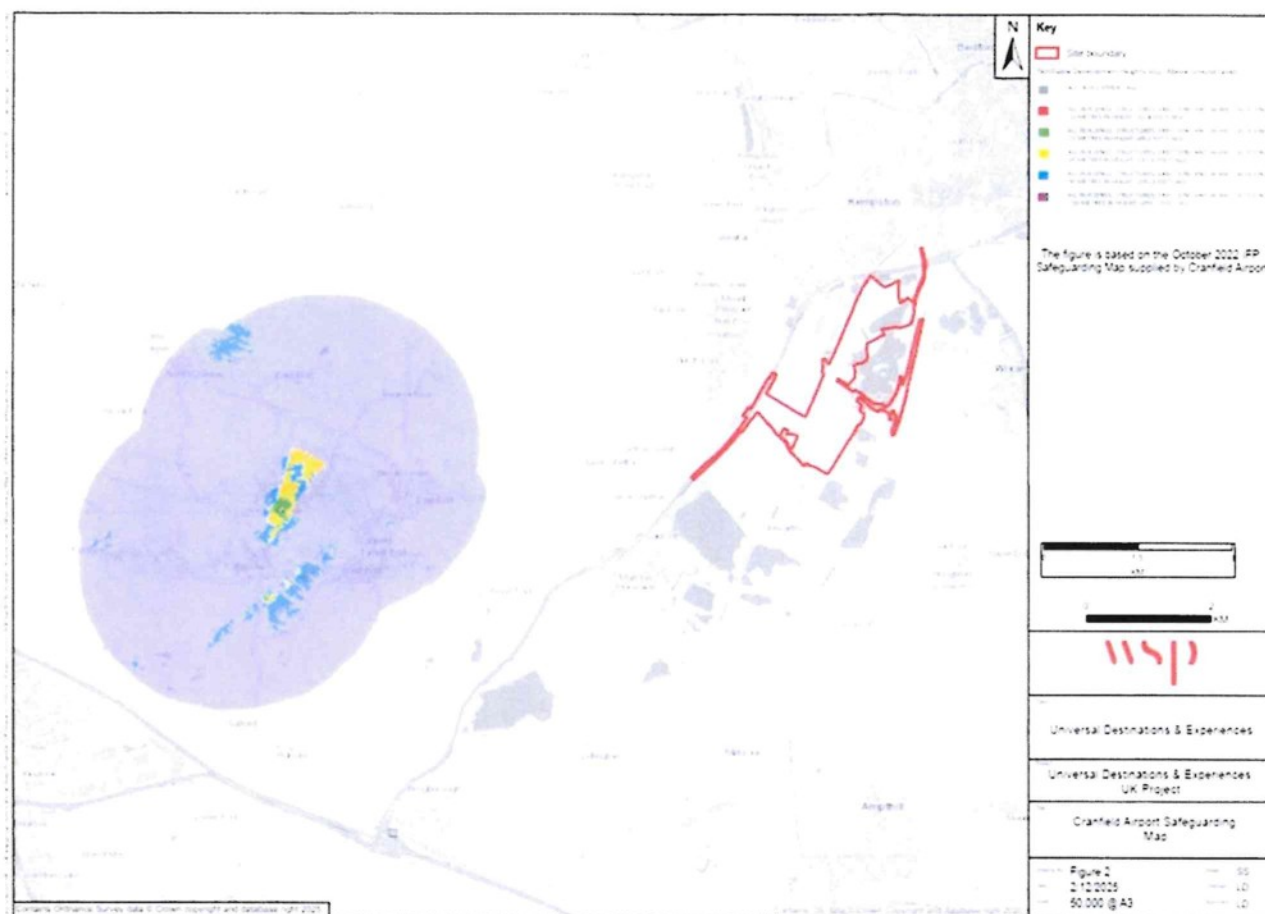
2.3. Consultation with Cranfield Airport

- 2.3.1. On 29 April 2024 a meeting was held with Cranfield Airport to confirm the Parties' understanding of the potential risks associated with the presence of the aerodrome. Follow up actions were agreed at that meeting as follows:
- (a) A safeguarding map would be provided by Cranfield Airport.
 - (b) The Promoter would consider the need for a glint and glare assessment.
 - (c) The airport would be notified in respect of crane usage at Site.
- 2.3.2. On 7 May 2025, a follow-up meeting was held with Cranfield Airport to update on project proposals and confirm necessary mitigation following review of the safeguarding map.
- 2.3.3. During the 7 May 2025, the Parties AGREED that, based on review of the safeguarding map:
- (a) the Site doesn't sit within the airport's declared safeguarding notifying zone;
 - (b) the Site sits to the north west of the airport - in effect in parallel to the airport; and
 - (c) aircraft on approach/departure to/from the north would not overfly the Site.
- 2.3.4. Therefore, it is considered that the Proposed Development would unlikely give rise to glint and glare impact (noting sensitive receptors with respect to glint and glare are pilot on final approach and the air traffic control tower).
- 2.3.5. Other mitigation is proposed to safeguard the airport's operations. These are set out at 2.4.

2.4. Mitigation for Cranfield Airport

- 2.4.1. The safeguarding map for Cranfield airfield was provided on 29 April 2024. As illustrated in Figure 2.1, the Site does not fall within the airport's safeguarding zone. As such, the Proposed Development will not trigger a notifiable event, in which the airport would expect to be consulted upon. Additional mitigation will be undertaken as follows in compliance with UK aviation regulation:
- During the Construction Phase the relevant undertaker will contact the Civil Aviation Authority (CAA) with details of temporary tall structures i.e. cranes.
 - UDX will contact the CAA through the prescribed CAP processes with details of the final location and height of tall structures, and details of proposed drone shows (height and frequency). The CAA will then update the relevant aeronautical maps and charts for UK airspace users and confirm appropriate mitigation for tall structures such as fixed lighting requirements.
 - During the Operational Phase the relevant undertaker will contact the CAA with details of events such as pyrotechnics/firework shows and drone shows, occurring within the Site boundary.
- 2.4.2. All of these measures relate to aviation safety and are controlled via the civil aviation regime, based upon UK legislation and non-legislative regulatory material, which is governed by the CAA in its capacity as the UK aviation regulator.
- 2.4.3. Therefore the Parties AGREE that the Proposed Development will not interfere with the safe and efficient operation of Cranfield Airport.

Figure 2.1 - Cranfield Airport Safeguarding Zones





This APS is prepared jointly and agreed by the parties.

Signed by

For and behalf of UDX

Date: 14 May 2025

Senior Vice President, External Affairs

Signed by

For and behalf of CA

Date: 13 May 2025



Universal Destinations and Experiences UK Project

Summary Agreed Position with Old Warden Aerodrome

May 2025

1. INTRODUCTION

1.1. Purpose of this Agreed Position Summary

- 1.1.1. This Agreed Position Summary ("APS") has been prepared by Universal Destinations and Experiences ("UDX") and Old Warden Aerodrome. For the purpose of this APS, UDX and Old Warden Aerodrome will jointly be referred to as "the Parties".
- 1.1.2. UDX 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.
- 1.1.3. 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 and processing facilities associated with the ERC; vehicle parking, maintenance and servicing; access routes and circulation spaces; landscaping; utility conveyance infrastructure; and use of land necessary to support construction.
- 1.1.4. The planning proposal also includes road and rail-related development including:
- a new slip road to provide access to and from the A421;
 - an expanded railway station on the Thameslink/Midland Main Line at Wixams;
 - improvements to Manor Road; and
 - improvements to certain other local roads.
- 1.1.5. 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. Overall, it is intended that this APS will be submitted alongside the planning proposal to give a clear position of the state and extent of agreement between the Parties as at the date on which this APS is signed
- 1.1.6. Notwithstanding other relevant civil aviation regulation, this APS has been prepared with consideration of The Town and Country Planning (safeguarding aerodromes, technical sites and military explosives storage areas) Direction (2002) (the 'Consultation Direction') and Civil Aviation Publication (CAP) 738 'Safeguarding of Aerodromes' (2020).

2. MATTERS AGREED BETWEEN THE PARTIES

2.1.1. The Parties are AGREED on all matters, as set out below.

2.2. Old Warden Aerodrome

2.2.1. Old Warden Aerodrome holds a Civil Aviation Authority (CAA) seasonal licence, confirming its facilities meet prescribed safety criteria, which allows for certain types of aircraft to operate from the aerodrome.

2.2.2. The aerodrome does not benefit from the Consultation Direction, as it is not officially safeguarded. However, in line with aerodrome safeguarding guidance, Old Warden Aerodrome has produced a safeguarding map, and this map has been deposited with Bedford Borough Council.

2.2.3. Safeguarding maps are colour coded and site-specific, designed to indicate to a planning authority those types of development upon which consultation is required. Its purpose is to ensure that an aerodrome's safe and efficient operations are not inhibited by other proposed buildings, structures or constructions coming forward which might infringe the established obstacle limitation surfaces, or obscure runway approach lights or have the potential to impair the performance of aerodrome navigation aids, radio aids or telecommunication systems.

2.2.4. Old Warden Aerodrome is located approximately 11km east of the closest point of the Site Boundary, which is outside of the Air Traffic Zone and approach paths to the main runways.

2.3. Consultation with Old Warden Aerodrome

2.3.1. E-mail correspondence was received on 7 May 2024 from Old Warden Aerodrome. The correspondence included:

- (a) A written safeguarding letter which details airspace restrictions relating to the operation of Old Warden airfield.
- (b) A copy of the safeguarding map.

2.3.2. Old Warden aerodrome stated in the correspondence that "there isn't anything in there that worries me, as regards our aerodrome activity, during the construction phase at least. Once operational my concerns would be around the use of drones and/or light and laser shows (daytime/dusk)."

2.4. Mitigation for Old Warden Aerodrome

2.4.1. The written safeguarding letter and accompanying Enclosure 2 explain that the Civil Aviation Authority has granted Old Warden aerodrome with a "display area" for annual flying displays which must be kept clear of persons and vehicles during a flying display – the area expands to 2,000ft above the aerodrome to a distance of no more than 1km from the end of the airfield runway. The Proposed Development is over 10km from the aerodrome reference point quoted in the safeguarding letter, and therefore outwith the display area.

2.4.2. The safeguarding letter also identifies a radius of 3.7km from the aerodrome which incorporates the Approach and Departure slopes and the Air Traffic Zone for the aerodrome, an area which requires strict control of all objects from ground level to 2,000ft above aerodrome level. The Proposed Development is over 10km from the aerodrome reference point quoted in the safeguarding letter, and therefore outwith the Approach and Departure slopes, and the Air Traffic Zone and therefore outside an area where strict control on objects is required.

2.4.3. At over 10km from Old Warden aerodrome, the Proposed Development is within an area where aircraft associated with the aerodrome typically operate between 1,000ft to 2,000ft (304.8m – 609.6m), which is well

above the maximum height of any structure associated with the Proposed Development (115m) and therefore will not interfere with activities at the aerodrome.

2.4.4. As illustrated in Figure 2.1, the Site does not fall within the aerodrome's safeguarding zone. As such, the Proposed Development will not trigger a notifiable event, in which the airport would expect to be consulted upon.

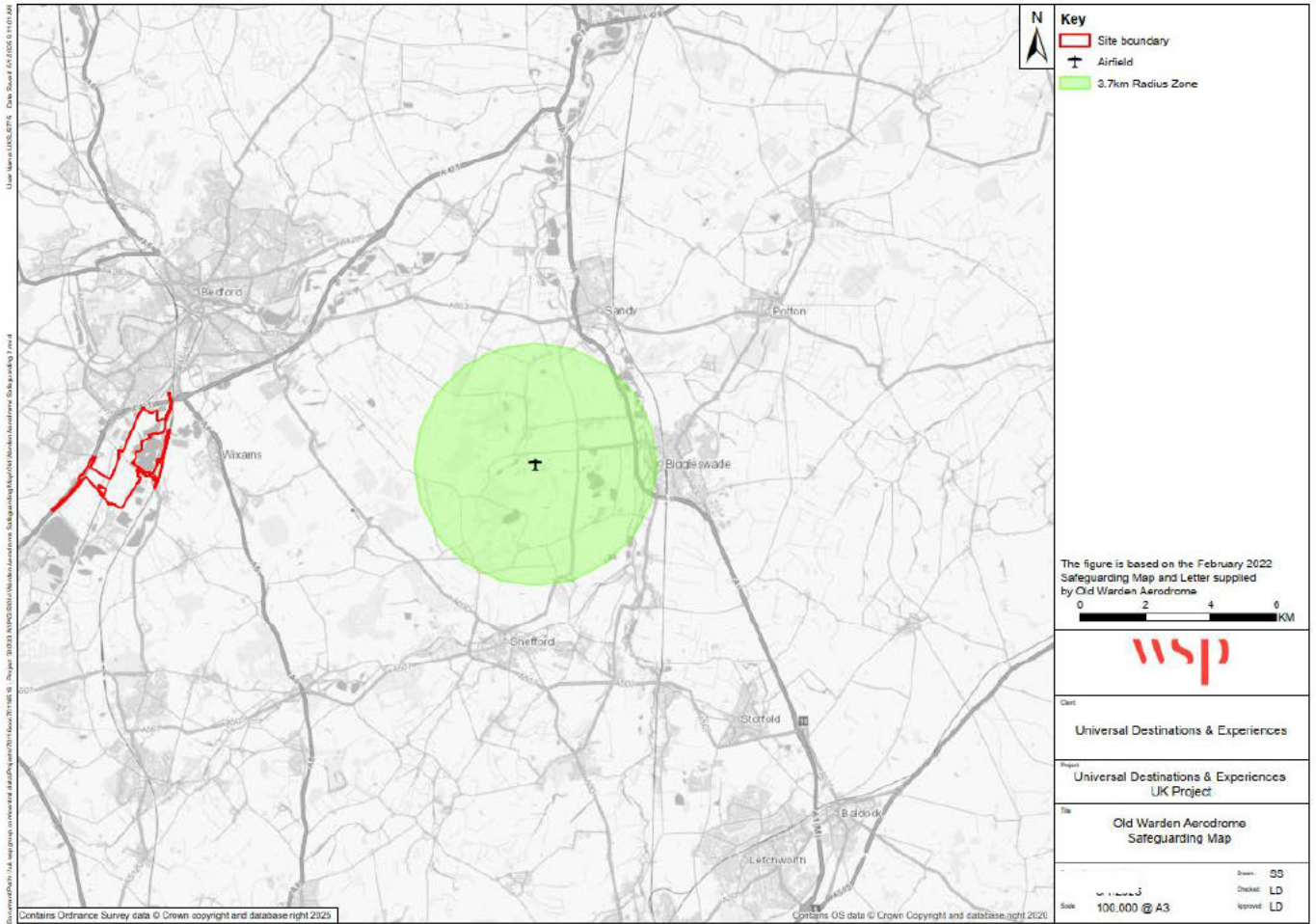
2.4.5. Additional mitigation will be undertaken as follows in compliance with UK aviation regulations:

- During the Construction Phase the relevant undertaker will contact the Civil Aviation Authority (CAA) with details of temporary tall structures i.e. cranes.
- UDX will contact the CAA through the prescribed CAP processes with details of the final location and height of tall structures, and details of proposed drone shows (height and frequency). The CAA will then update the relevant aeronautical maps and charts for UK airspace users and confirm appropriate mitigation for tall structures such as fixed lighting requirements.
- During the Operation Phase the relevant undertaker will contact the CAA with details of events such as pyrotechnics/firework shows and drone shows, occurring within the Site boundary.
- All of these measures relate to aviation safety and are controlled via the civil aviation regime, based upon UK legislation and non-legislative regulatory material, which is governed by the CAA in its capacity as the UK aviation regulator.

2.4.6. All of these measures relate to aviation safety and are controlled via the civil aviation regime, based upon UK legislation and non-legislative regulatory material, which is governed by the CAA in its capacity as the UK aviation regulator."

2.4.7. Therefore the Parties AGREE that the Proposed Development will not interfere with the safe and efficient operation of Old Warden Aerodrome.

Figure 2.1 – Old Warden Aerodrome Safeguarding Zones





The APS is prepared jointly and agreed by the parties.

Signed by

[Redacted signature]

For and behalf of UDX

[Redacted signature]

Date:15 May 2025.....

Signed by

[Redacted signature]

For and behalf of OWA

[Redacted signature]

Date:



A UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT

Summary of Agreed Position

ELECTRICITY CONNECTION

SUMMARY OF AGREED POSITION BETWEEN UNIVERSAL DESTINATIONS & EXPERIENCES
AND UK POWER NETWORKS

MAY 2025



1. INTRODUCTION

Purpose of this Summary of Agreed Position

- 1.1. This Summary of Agreed Position ("SoAP") has been prepared by Universal Destinations & Experiences ("UDX") and UK Power Networks ("UKPN"). For the purpose of this SoAP, UDX and UKPN will jointly be referred to as "the Parties".
- 1.2. UDX 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.
- 1.3. 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 Entertainment Resort Complex ("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 and processing facilities associated with the ERC; vehicle parking, maintenance and servicing; access routes and circulation spaces; landscaping; utility conveyance infrastructure; and use of land necessary to support construction.
- 1.4. The planning proposal also includes road and rail-related development including:
 - a new slip road to provide access to and from the A421;
 - an expanded railway station on the Thameslink/Midland Main Line at Wixams;
 - improvements to Manor Road; and
 - improvements to certain other local roads.
- 1.5. 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.
- 1.6. Preparation of this SoAP has been informed by a programme of discussions between the Parties. The purpose of this SoAP is to set out agreed information about the Proposals.
- 1.7. This SoAP relates to "ELECTRICITY CONNECTION".
- 1.8. This summary note contains the key principles for the Electricity Connection Strategy for the UDX UK Project at the former brickworks and adjoining land, Kempston Hardwick, Bedford.
- 1.9. This note also summarises the outcomes of consultations with UKPN on the Electricity Connection Strategy.
- 1.10. UDX has consulted with UKPN during 2024 and 2025 and discussed principles and approach for Electricity Connection.
- 1.11. The key principles are based on a cautious worst-case approach, using existing available information.
- 1.12. Designs for the Electrical Connection will be developed to deliver on the commitments made once planning approval is granted and the detail of the site layout is fixed. The Development Zones are shown in Figure 1 for reference.

- 1.13. Overall, this SoAP is intended to give a clear position of the state and extent of agreement between the Parties as at the date on which this SoAP is signed and submitted to the Secretary of State.
- 1.14. Within this SoAP the term “inchoate” means unfinished, indicative or approximate based on initial high-level desktop studies, subject to further analysis and negotiation, feasibility studies and detailed design and not yet defined
- 1.15. In the following text, where a principle has been discussed and found to be acceptable, it is marked as “AGREED”. Where a principle is subject to an AGREED process post planning consent, for which the output will be submitted for approval to UKPN, it is marked as “TO BE AGREED”.

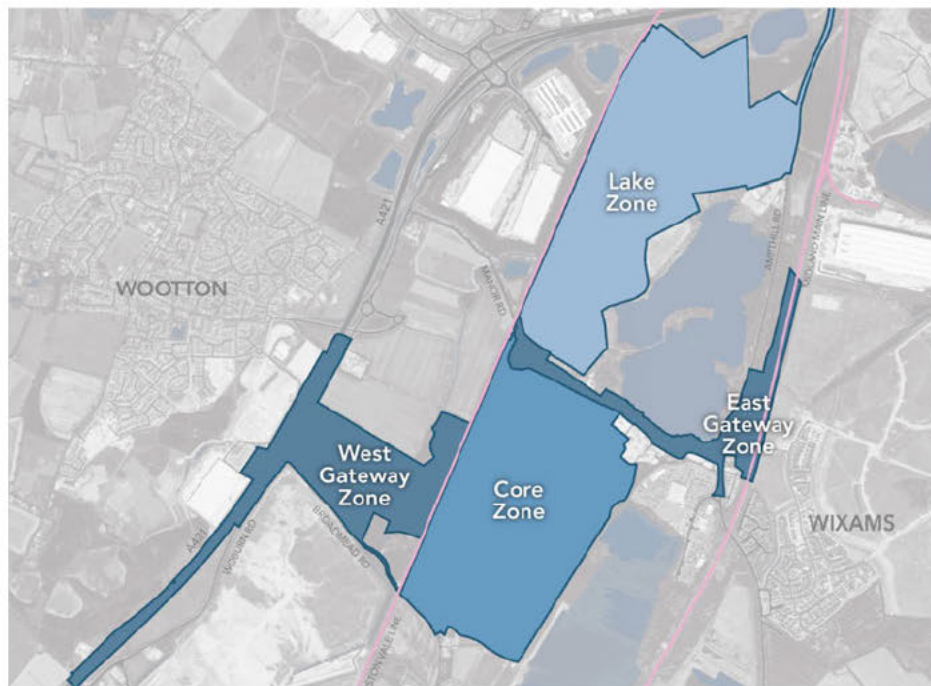


Figure 1 - Zone Plan

2. MATTERS AGREED BETWEEN THE PARTIES

The Parties are AGREED on the following matters, excluding those outlined in Section 3 below, and in particular are AGREED on the following points:

- 2.1. The maximum import requirement of the Electricity Connection Strategy for the UDX UK Project has been estimated by UDX to be 80 MVA.
- 2.2. The maximum import requirement of the Electricity Connection Strategy for the Universal ERC component of the UDX UK Project has been estimated to not exceed 37 MVA.
- 2.3. UKPN have completed an initial feasibility study to outline how the 37MVA and 80 MVA demands of the Proposed Development can be met by UKPN by 2028 and 2051 respectively.
- 2.4. The Electrical Connection is required by 2028 in order to support construction and commissioning in advance of the ERC opening in 2031.
- 2.5. UKPN have considered several viable options for points of connection as shown in Figure 2. Whilst all options remain under consideration the UKPN minimum cost option currently appears likely to be a connection at Marston Road Grid substation.



Figure 2 - UKPN Point of Connection Locations Considered

- 2.6. To formalise UDX requirements and secure capacity a UKPN Connection Offer for 37 MVA (UKPN reference 8600030926 / QID 3600011508) at Marston Road Grid substation has been prepared by UKPN. The offer was accepted by UDX on 30th July 2024 and the offer acceptance validated and accepted by UKPN.
- 2.7. UDX has accepted Connection Offer Option 'C' where UK Power Networks carries out all the 'non-contestable' works only and an Independent Connection Provider carries out all of the works classified as 'contestable' on behalf of UDX.
- 2.8. UKPN will endeavour to complete their 'non-contestable' element of works as described above ready for energisation before 2028.
- 2.9. UKPN have identified that potential works may be required to extend Marston Road Grid substation to facilitate the 37 MVA connection, however the final design solution is inchoate awaiting further investigation and design development.
- 2.10. The maximum export capacity of the connection is 0 KW.
- 2.11. The 37 MVA Connection Offer (UKPN reference 8600030926 / QID 3600011508) includes several milestones which are due to be complete in 2025 of which the following have been confirmed as complete by UKPN:
 - Milestone 1 is partially complete. WSP has confirmed their appointment as UDX's appointed Environmental Consultant for the purposes of the EIA. Milestone 1 will become complete on provision of evidence to UKPN of submission of the Special Development Order (SDO) to the Ministry of Housing, Communities and Local Government (MHCLG).
 - Milestone 3 is deemed complete and relates to UDX providing details of their land ownership to prove they have obtained the necessary Land Rights for the parts of the proposed Development which the Electricity Connection may rely on.
 - Milestone 4 is deemed complete and relates to all relevant Transmission System Interface processes as required under the Connection and Use of System Code being completed.

- 2.12. There are other milestones due for completion in 2026.
- 2.13. Prior to 2028 UKPN will endeavour to provide the temporary building supplies (TBS) required to facilitate construction, with TBS load requirement and point(s) of connection to be confirmed, following application UKPN by UDX.
- 2.14. The installation of the electrical connection and any reinforcement deemed necessary by UKPN to existing UKPN infrastructure would be delivered by UKPN using UKPN's statutory powers and permitted development rights and is not reliant on the Special Development Order. To the extent permitted development rights are not available planning permission will be sought.

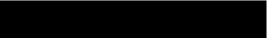


3. MATTERS YET TO BE AGREED BETWEEN THE PARTIES

The Parties confirm that the following areas are TO BE AGREED by the Parties:


- 3.1. As noted in an earlier section the maximum import requirement of the Electricity Connection Strategy for the Universal Destination and Experiences UK Project is estimated by UDX to be 80 MVA. Following planning consent and subject to application by UDX, UKPN will determine the connection options necessary (including programme) to provide this additional capacity exceeding the 37MVA already accepted.
- 3.2. UKPN has carried out a high-level desk top capacity study only to establish if the demands of the Project can be met. Under the accepted Connection Offer Option 'C', UK Power Networks will carry out the 'non-contestable' works only and an Independent Connection Provider will carry out all 'contestable' works which include routing for the Electricity Connections on behalf of UDX.
- 3.3. As part of their high-level desk top capacity study UKPN have provided some high-level indicative connection routes from Marston Road Grid substation to the Site, however no investigatory work, surveys, identification of all potential route options, optioneering studies or appraisals of the potential routes or route proving has been completed taking into account, but not limited to, site constraints, ground conditions, land use and ownership, apparatus / equipment design and specification, construction access requirements and construction duration(s). There is no known restriction or requirement for a planning condition for the ELECTRICITY CONNECTION to be in place prior to UDX's operation of the project.
- 3.4. Following planning approval, route identification will be carried out by UDX in conjunction with UKPN taking into account a range of factors. Additional surveys and investigation will be undertaken to identify preferred routes and support the design development and detail of a selected final route. As such all routing is currently, and will remain, inchoate awaiting further investigation and design development.
- 3.5. Exact locations and connection details for TBS to be provided by UKPN are to be determined and agreed following application by UDX.

This SoAP is prepared jointly and agreed by the parties and there is no known restriction or requirement for a planning condition for the ELECTRICITY CONNECTION to be in place prior to the Promoters operation of the Project.

Signed by: 
Senior Vice President, External Affairs
For and behalf of UDX



Date: ...14/05/2025.....

Signed by: 
Senior Project Manager, Major Connections
For and behalf of UKPN



Date: 12/05/2025



Universal Destinations & Experiences UK Project.

Summary of Agreed Position with the Forest of Marston Vale Trust

June 2025

1. INTRODUCTION

1.1. Purpose of this Agreed Position Summary

- 1.1.1. This Agreed Position Summary (“APS”) has been prepared by Universal Destinations and Experiences (“UDX”) and the Forest of Marston Vale Trust. For the purpose of this APS, UDX and the Forest of Marston Vale Trust will jointly be referred to as “the Parties”.

1.2. UDX development proposal

- 1.2.1. UDX 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.
- 1.2.2. 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 Entertainment Resort Complex (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 and processing facilities associated with the ERC; vehicle parking, maintenance and servicing; access routes and circulation spaces; landscaping; utility conveyance infrastructure; and use of land necessary to support construction.
- 1.2.3. The planning proposal also includes a series of infrastructure improvements including:
- a new slip road to provide access to and from the A421;
 - an expanded railway station on the Thameslink/Midland Main Line at Wixams;
 - improvements to Manor Road; and
 - improvements to certain other local roads.
- 1.2.4. 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.
- 1.2.5. The Site lies within the area designated as the Forest of Marston Vale.

1.3. Forest of Marston Vale

- 1.3.1. In 1991, the Government designated 61 square miles between Bedford and Milton Keynes as the Forest of Marston Vale (the “Forest”), one of England’s Community Forests and part of a bold and pioneering vision to use trees and woodlands to transform the prospects of damaged landscapes around major towns and cities. Together, England’s Community Forests form the country’s largest environmental regeneration initiative.
- 1.3.2. The vision for the Forest of Marston Vale is to deliver environmental regeneration through increasing tree cover to 30%, transforming perceptions of the once-degraded area to stimulate social and economic regeneration, whilst providing major landscape, recreation, biodiversity, and quality of life benefits. To drive that vision forward, the Forest of Marston Vale Trust was created by the founding partnership of the Local

Authorities, Government agencies and local industry. The Forest of Marston Vale Trust is the registered charity that leads on the creation of the Forest of Marston Vale

- 1.3.3. The core target for creating the Forest is increasing tree cover to 30% – around a ten-fold increase from the starting position of c.3% in the early 1990's – as a means to transform the social, economic and environmental prospects of the area. By 2025, the Forest of Marston Vale Trust, working with local communities, landowners, businesses and partners, has already increased tree cover to 16.9%.
- 1.3.4. The creation of the Forest of Marston Vale is about placemaking; it's about creating a new 'sense of place' and an opportunity to demonstrate how environmental regeneration can redefine an area and transform its landscape and prospects.
- 1.3.5. The 2000 Forest of Marston Vale Plan specifically addressed the area being developed by UDX as "THE BRICKFIELDS" and recognized special considerations for this specific area. That plan recognized that "The relationship of new woods with open waterbodies such as Stewartby and Brogborough lakes will be very important and a mix of waterside land uses including open land, wetlands and woodland should be developed." That Plan goes on to address the special considerations needed for the development of hedgerows and buffers along railways and highways, including the A421.
- 1.3.6. The 2000 Forest of Marston Vale Plan also recognizes the vital importance of grassland, wetlands and other habitats within the Marston Vale and there is a commitment to conserve and increase the areas of such habitats. The plan envisions that large-scale habitat creation initiatives such as the Marston Vale Millennium Country Park will provide valuable resources for wildlife as will an enhanced network of smaller habitats across the Forest. The plan specifically encourages the development of non-wooded habitats within the Forest to maximize the ecological potential of the Marston Vale. A key point of this plan is "promoting the appropriate management and increasing the amount of wetland habitats through the Marston Vale including watercourses, ponds, lakes and any marsh areas."
- 1.3.7. Another key feature of the 2000 Forest of Marston Vale Plan is community access and interpretation strategies. Weaving active travel ways, public rights of way, and footpaths and trails through a variety of landscapes and habitats will provide public access that will soften the hard urban edge. Providing interpretive signage and markings will also engage the public in the value of the Forest and the variety of landscapes and habitats within a healthy forest ecosystem.
- 1.3.8. Equally importantly, the Forest of Marston Vale and the Bedfordshire and River Ivel Internal Drainage Board published, on behalf of the Marston Vale Surface Waters Group, the 2002 Marston Vale Surface Waters Plan. That plan recognized that the Kempston Hardwick clay extraction pits were of high value in the development of a strategic plan to deal with surface water management, including flood attenuation and rainwater harvesting activities. The health of Elstow Brook and the surrounding areas would be greatly enhanced through the development of these abandoned and poorly maintained pits into strategic surface water management facilities and enhanced ecological assets.

2. MATTERS AGREED BETWEEN THE PARTIES

2.1.1. The Parties are AGREED on the following points:

2.2. Policy position

2.2.1. The Forest of Marston Vale is one of England's nationally designated Community Forests and has explicit Government policy support in the National Planning Policy Framework. Paragraph 152 states that:

"The National Forest and Community Forests offer valuable opportunities for improving the environment around towns and cities, by upgrading the landscape and providing for recreation and wildlife. The National Forest Strategy and an approved Community Forest Plan may be a material consideration in preparing development plans and in deciding planning applications."

2.2.2. Policy 36S of the Bedford Local Plan 2030 states that development proposals within the Forest of Marston Vale area will be required to:

- Demonstrate how they will deliver 30% tree cover across their development site. This can be achieved through a combination of new planting of trees, woodlands and hedgerows within development sites and
- Contribute to the environmentally led regeneration of the Forest of Marston Vale, in line with the aims of the Forest Plan and
- Demonstrate how their proposals reflect relevant design guidance (supplementary planning document) for development within the Forest of Marston Vale.

2.2.3. The purpose behind this policy is to achieve environmentally led regeneration. A Supplementary Planning Document (SPD) was adopted in December 2022 to achieve this aim and paragraph 2.1.2 and 2.1.3 explains that the vision for Forest of Marston Vale is:

"to deliver environmental regeneration through increasing tree cover to 30%, transforming perceptions of the once-degraded area to stimulate social and economic regeneration, whilst providing major landscape, recreation, biodiversity, and quality of life benefits. ... The core target for creating the Forest is increasing tree cover to 30% – around a ten-fold increase from the starting position in the early 1990's – as a means to transform the social, economic and environmental prospects of the area."

2.2.4. The Forest of Marston Vale Trust acknowledges that while the overall tree cover goal within the Forest is 30%, it is recognized that the Forest of Marston Vale Plan specifically addresses the need for a more diverse forest habitat specifically within THE BRICKFIELDS, which also must balance the need for the preservation and enhancement of the existing open water conservation areas and wetlands.

2.2.5. The Forest of Marston Vale Trust recognises that UDX's proposed development has the potential to deliver major social and economic regeneration within the area, in a way which is broadly compatible with the vision, aims and objectives of creating the Forest of Marston Vale. Within the area around the former Kempston Hardwick clay pits, UDX intends to develop an ecological area that not only includes forested areas, but also other diverse habitats of grassland, wetland, marshes, open water bodies, water courses, and hedgerows and other elements of a Green Infrastructure Framework that support overall forest health while preserving and expanding existing conservation areas, wetlands, and marshlands.

2.2.6. The Forest of Marston Vale Trust seeks to work positively with UDX to help ensure that UDX's proposed development delivers on the core environmental regeneration aims and objectives of the 2000 Forest of Marston Vale Plan, and delivers a diverse woodland habitat of forest, wetlands, marshlands, water courses,

open water bodies, mosaic habitats, and other ecological features that diversify and provide accessibility to the this are of the Forest of Marston Vale.

- 2.2.7. The Forest of Marston Vale Trust recognises that UDX's proposed development, which includes a commitment to deliver a wetland habitat based Ecological Enhancement Area, together with significant woodland planting on the perimeter and tree planting within the Entertainment Resort Complex as a landscape feature, has the potential to deliver on the core environmental vision, aims and objectives for creating the Forest of Marston Vale.

2.3. Engagement with Forest of Marston Vale Trust

- 2.3.1. UDX has consulted with the Forest of Marston Vale Trust on its proposed development. An initial meeting was held on 26th July 2024 and a follow up update meeting on 8th May 2025.

2.4. Delivering 30% tree cover within defined upland areas.

- 2.4.1. UDX recognises the importance of development within the Forest of Marston Vale contributing to the ongoing physical creation of the 'Forest' landscape. This aligns strongly with UDX's environmental vision for the proposed development, which includes the intended use of substantial tree planting across the ERC to create visually attractive, environmentally rich and immersive visitor experiences as a core part of the commercial proposition.
- 2.4.2. The Forest of Marston Vale Trust recognises that UDX has not yet undertaken the detailed design work for the entirety of the proposed development, some parts of which may not be constructed for many years due to the proposed phased approach to building out the Site. The Forest of Marston Vale also recognizes that the 2000 Forest of Marston Vale Plan and the 2002 Marston Vale Surface Waters Plan calls for a diverse range of habitats at this specific location with the Forest, and further requires extensive strategic surface water management features and expanded water based ecological and conservation areas that will significantly enhance the Forest. Therefore, the Forest of Marston Vale Trust accepts that UDX has demonstrated a proposed design that meets the Marston Vale Surface Water Plan and has prepared a Green Infrastructure Framework that identifies significant upland woodland areas interspersed through the master plan, and that the proposed development will deliver against the normal 30% tree cover goal within designated upland woodland areas within the Forest.
- 2.4.3. In recognition of these points, the Forest of Marston Vale Trust and UDX will work together on the basis of the principle that UDX seek to achieve the strategic objectives outlined in the 2000 Forest of Marston Vale Plan and the Marston Vale Surface Waters Plan with the agreed goal of delivering against the normal 30% tree cover within designated upland woodland habitat areas within the Forest through provision of the woodland habitat areas identified on the Green Infrastructure Framework plan for the Site by the completion of the final phase of construction.

2.5. Recreation and quality of life benefits

- 2.5.1. The proposed development is delivering a major new Entertainment Resort Complex (ERC). The ERC will deliver a world class tourism destination, building on UDX's industry-leading experience in building, owning and operating ERCs. The ERC will be an international destination, emulating the experiences that UDX already delivers to millions of people every year in its existing resorts across the globe.
- 2.5.2. The proposed development will result in a transformative regional impact, including through approximately 8,000 new jobs once operational, approximately 80% of whom will come from Bedfordshire and surrounding areas. It will be a major boost to local and UK tourism, attracting millions of visitors. UDX will also play an active role in the community, with a proven track record of local partnerships. This is considered to result in substantial quality of life benefits, broadly consistent with the aims of the Forest of Marston Vale.

2.6. Green Infrastructure Statement

2.6.1. The proposed development is supported by a comprehensive approach to delivering Green Infrastructure.

2.6.2. UDX has established some site-wide design principles which are considered to support the objectives of the Forest of Marston Vale.



Figure 3: Design Principles

2.6.3. The proposed development will deliver the following key spatial moves, which are considered to contribute to meeting the principles of the Forest of Marston Vale SPD:

- Improve Green Connections and Biodiversity
 - Inclusion of ecological connectors such as watercourses and woodland to join up habitats which would otherwise be fragmented
 - Green links through the site along existing and proposed roads and recreational routes
 - Provision of an EEA to create, restore and improve habitats, as set out in the Outline Habitat Creation and Enhancement Plan
 - Green crossings to allow safe passage for wildlife
 - Provision of bat hop-overs
- Establish an Active Travel Network
 - Walking routes throughout the Site
 - a Lake Path around the enhanced waterbody in the Lake Zone
 - Crossings across the site to improve connectivity
 - Cycle routes along new highways and segregate cycle route
- Transport hubs to integrate public transport with access to the ERC
- Celebrate Unique Landscape Features
 - Primary gateways at key locations across the Site
 - Secondary gateways supporting wayfinding and navigation
 - Identification of key viewpoints along the Lake Path, with enhanced seating, landscaping and interpretative signage.

- Integrate Water Management Systems

- Core Zone relocated watercourse including 10m riparian protection zone
- Lake Zone enhanced water courses for improved surface water management and habitat.
- New wetland habitat in the Lake Zone as set out in the Outline Habitat Creation and Enhancement Plan
- Surface water network including swales, below ground pipe networks, green roofs, rain gardens and permeable paving
- Development of strategic surface water management facilities aligned with the Marston Vale Surface Waters Plan to support rainwater harvesting and surface water reuse and recycling
- Surface water quality control

2.6.4. The planning proposal will be accompanied by a Green Infrastructure evaluation following Natural England's methodology.

2.7. Agreed position

2.7.1. Based on the approach and commitments made by UDX in this document to positively contribute to the diverse habitats of the 2000 Forest of Marston Vale Plan, including the 30% tree cover target within designated upland woodland areas in the Forest, deliver recreation and quality of life benefits, and deliver significant green infrastructure, the Forest of Marston Vale Trust is broadly supportive of UDX's proposed development and considers that it has the potential to transform the social, economic and environmental prospects of the area in a way which is entirely consistent with and complementary to the ongoing creation of the Forest of Marston Vale as one of England's Community Forests.

MATTERS YET TO BE AGREED BETWEEN THE PARTIES

The Parties confirm that the following areas are TO BE AGREED by the Parties:

None.

APS is prepared jointly and agreed by the parties.

Signed by

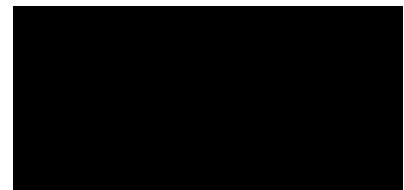
For and behalf of UDX



Date:

Signed by , FOREST DIRECTOR

For and behalf of Forest of Marston Vale Trust



17 June 2025 | 7:43 PM BST
Date:



Bedfordshire

Fire & Rescue Service

bedsfire.gov.uk
 Southfields Road
Kempston, Bedford
MK42 7NR
 bedsfirealert.co.uk
 @bedsfire

FAO: Universal Destinations & Experiences

By Email Only

Our Ref:
Name:
Telephone:
Email:
Date:

Please respond to:

14 May 2025

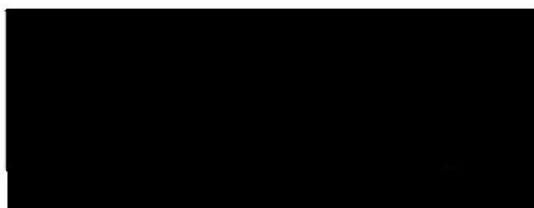
Dear Sir/Madam,

The Bedfordshire Fire and Rescue Service and the Bedfordshire Local Resilience Forum are supportive of the measures that UDX has proposed in its planning proposal to mitigate impacts on our service as follows:

- UDX will collaborate with local healthcare providers and emergency responders, ensuring shared protocols, familiarisation with site risks, and conducting emergency drills to enhance incident response.
- UDX will also liaise with emergency responders related to site response locations, protocols, operational risks, and site familiarity to facilitate efficient and effective incident response.
- UDX will communicate and gain mutual understanding of onsite rescue/response resources and identification of agency support and equipment needs.
- UDX will offer and provide onsite emergency drills and training opportunities for responder agencies.

UDX will set up an Emergency Planning Steering Group to ensure regular collaboration on emergency responder issues to achieve the above measures. The Bedfordshire Fire and Rescue Service agree to be a member of this Steering Group, which I recommend be established under the remit of the Bedfordshire Local Resilience Forum to avoid duplication and to support effective integration with the existing emergency planning arrangements established under the Civil Contingencies Act (2004).

Yours faithfully,



**CHIEF FIRE OFFICER AND CHIEF EXECUTIVE
CHAIR OF BEDFORDSHIRE LOCAL RESILIENCE FORUM**



Bedfordshire Police

Compassionate | Courageous | Inclusive | Professional | Proud

Friday 16th May 2025

John McReynolds

Senior Vice President, External Affairs
Universal Destinations & Experience
1000 Universal Studios Plaza
Orlando
Florida
32819

Dear John,

RE: Universal Destinations and Experiences

Bedfordshire Police are supportive of the measures that UDX has proposed in its planning proposal to mitigate impacts on its service as follows:

- UDX will collaborate with local healthcare providers and emergency responders, ensuring shared protocols, familiarisation with site risks, and conducting emergency drills to enhance incident response.
- UDX will also liaise with emergency responders related to site response locations, protocols, operational risks, and site familiarity to facilitate efficient and effective incident response.
- UDX will communicate and gain mutual understanding of onsite rescue/response resources and identification of agency support and equipment needs.
- UDX will offer and provide onsite emergency drills and training opportunities for responder agencies.

UDX will set up an Emergency Planning Steering Group to ensure regular collaboration on emergency responder issues to achieve the above measures. Bedfordshire Police agree to be a member of this Steering Group.

UDX will work with Police and other emergency responders, to agree demand projections and resource requirements arising from both the project and the site and commit to supporting project teams with relevant information and data sharing.

With Kind Regards,

[Redacted Signature]

[Redacted Name]

**Assistant Chief Constable
Bedfordshire Police**

[Redacted Address]



Cambridgeshire
Chambers of
Commerce



[REDACTED]
Universal Destinations & Experience
1000 Universal Studios Plaza
Orlando
Florida
32819

Dear Mr [REDACTED],

Re: Support from businesses within Bedfordshire for Universal Destinations and Experiences (UDX) Bedford's SDO application

On behalf of the Bedfordshire Chamber of Commerce (BCC), we wish to submit an Open Letter asking the Government to approve UDX's Special Development Order (SDO) application located in Bedford. This Open Letter is authored by the BCC and signed by Northamptonshire & Milton Keynes Chamber of Commerce, Cambridgeshire Chamber of Commerce and Hertfordshire Chamber of Commerce that support the SDO application.

The delivery of the Entertainment Resort Complex which will attract 8.5 million visitors per annum in its opening year, rising to 12 million visitors per annum after 20 years of operation, would deliver significant economic benefits to the local, regional and national economy. We recognise the importance of the proposed Entertainment Resort Complex in contributing to our success and that of neighbouring communities.

The proposals would create 8,065 jobs in its opening year, rising to 12,475 jobs after 20 years of operation. Jobs will be provided at a range of skill levels. Of these jobs, approximately 69% would go to residents of Bedford and Central Bedfordshire. UDX is committed to making reasonable endeavours to achieve this goal through apprenticeships, internships, and earn-to-learn opportunities, and by collaborating with community partners, local educational institutions, and charitable organisations.

As part of the proposals, UDX are set to deliver a range of employment and skills opportunities for local residents, including but not limited to:

- Ensuring 5% of construction roles in earn and learn positions;
- Offering 50 paid internships annually from the second full year of operation, increasing to 60 by the fifth full year of operation;
- Offering 55 apprenticeships annually, rising to 70 by the fifth full year of operation; and
- Aiming for 20% of hires to be individuals who were previously unemployed or economically inactive.

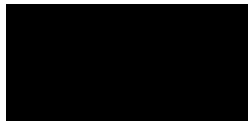
These employment and skills opportunities will be delivered on top of the significant supply chain and wider economic investment that the Entertainment Resort Complex will deliver locally, regionally, and nationally.

BCC's mission is to support businesses to grow and prosper in the UK and abroad, representing over 750 companies and 55,000 employees across all sectors. The UK's tourism industry is of vital importance to businesses. The Tourism Sector Deal states that in 2018 UK tourism attracted 38 million international visitors, contributing £23 billion to the economy, making it one of the UK's most important industries and the third-largest service export.

This is a once-in-a-generation investment opportunity that will make Bedfordshire the proud home of a best-in-class Entertainment Resort Complex. The proposals will deliver economic benefits for Bedfordshire that are of a larger scale than what could be provided by alternative forms of development that may otherwise come forward at this location.

We urge the Government to consider the strong support from the local business community when making a decision.

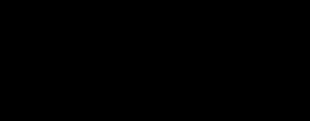
Signed:



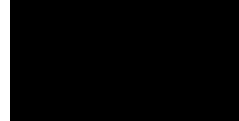
Chief Executive
Bedfordshire



Chief Executive
Northamptonshire
& Milton Keynes



Chief Executive
Cambridgeshire



Chief Executive
Hertfordshire



**East of England Ambulance Service NHS
Trust**

Head of Clinical Operations –
Bedfordshire & Luton
Luton Ambulance Station
5 Cosgrove Way
Luton
LU1 1XL

FAO: Universal Destinations and Experiences

To whom it may concern,

East of England Ambulance Service NHS Trust (EEAST) are supportive of the measures that UDX has proposed in its planning proposal to mitigate impacts on its service as follows:

- UDX will collaborate with local healthcare providers and emergency responders, ensuring shared protocols, familiarisation with site risks, and conducting emergency drills to enhance incident response.
- UDX will also liaise with emergency responders related to site response locations, protocols, operational risks, and site familiarity to facilitate efficient and effective incident response.
- UDX will communicate and gain mutual understanding of onsite rescue/response resources and identification of agency support and equipment needs.
- UDX will offer and provide onsite emergency drills and training opportunities for responder agencies.
- UDX will collaborate with East of England Service NHS Trust in relation to additional call volume within the EEAST borders which is in direct association to UDX development and site.

UDX will set up an Emergency Planning Steering Group to ensure regular collaboration on emergency responder issues to achieve the above measures. East of England Ambulance Service NHS Trust agree to be a member of this Steering Group.

Signed:

A black rectangular box redacting the signature of the Head of Clinical Operations.

– Head of Clinical Operations – Bedfordshire and Luton

Undersigned:

Chief Executive: Neill Moloney
Chair: Mrunal Sisodia OBE
www.eastamb.nhs.uk

**#WeAre
EEAST** A stylized star logo with a purple-to-orange gradient, positioned to the right of the text '#WeAre EEAST'.

For the attention of :

[REDACTED]
Universal Destinations & Experiences
1000 Universal Studios Plaza
Orlando, FL 32819

29th May 2025

Re: Govia Thameslink Railway Letter – Universal Studios Bedford Planning Proposal

Dear Mr McReynolds and Mr Williams

Many thanks for our recent discussions in relation to the Universal Studios proposal for Bedford and the critical role that the railway infrastructure and train services will support with this proposal. The purpose of this letter is to express Govia Thameslink Railway's (GTR) support and encouragement in principle to UDX and its Planning Proposal to provide an Entertainment Resort Complex (ERC), including a Theme Park and associated facilities, in the Bedford area (the UDX Planning Proposal).

In particular, GTR acknowledges that the rail industry and its operators will become a potential beneficiary of the Planning Proposal and the wider opportunities that this brings to support sustainable transport, social inclusion and modern investment in the railway network.

Delivering an undertaking of this scale will challenge the existing industry norms, including train service levels, resources, user experience, commercial and retail offerings and maintenance regimes to name just a few. GTR acknowledges that we, and our successor operators, will play a critical role in this venture and will utilise our expertise to guide the railway requirements for this Planning Proposal towards the timeframe outlined.

We are excited to work with you, industry colleagues and local and central government bodies to shape this future offering and integration into the wider demands of the railway system.

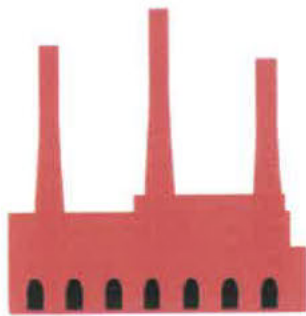
We acknowledge and consent to this letter being appended to the planning statement in the UDX Planning Proposal.

Yours sincerely,

[REDACTED]

[REDACTED]
Infrastructure Director
Govia Thameslink Railway Ltd





**Stewartby & Kempston
Hardwick**
PARISH COUNCIL

FAO: Universal Destinations and Experiences

14 May 2025

To whom it may concern,

As chair of Stewartby and Kempston Hardwick Parish Council, I write to offer our council's support for your efforts to build and operate a Universal-branded theme park and entertainment resort complex on the land you have acquired just south of Bedford.

We were grateful for the public engagement exercise your company ran in 2024 that demonstrated widespread public support for the project and for the local, regional and national economic transformation it has the potential to deliver.

We have also been engaged directly with your team as your plans have evolved, and have been grateful for the open, transparent and professional manner in which you have engaged with local elected officials and the general public.

We take a keen interest in the transport and infrastructure elements of your plans as the main population centre within our parish, Stewartby village, lies directly to the south of your site. The holding of a piece of land for an East West Rail station is especially welcome, along with the creation of direct slip roads from the A421 into your site. This will minimize the impact on local roads of construction, worker and visitor traffic.

We remain of the view that the provision of additional resources for local public services remains an important priority for our residents and will continue to make the case for these in other fora, but we understand of course that those matters lie outwith the scope of your planning application.

We look forward to working with you as you move this project forward and to engaging constructively as you bring these exciting plans to reality.

Yours sincerely,



Chair - Stewartby & Kempston Hardwick Parish Council

Imelville@stewartbykhparishcouncil.gov.uk



Wixams Parish Council
Lakeview Village Hall
155-160 Brooklands Avenue
Wixams
Bedford
MK426AB

10th June 2025

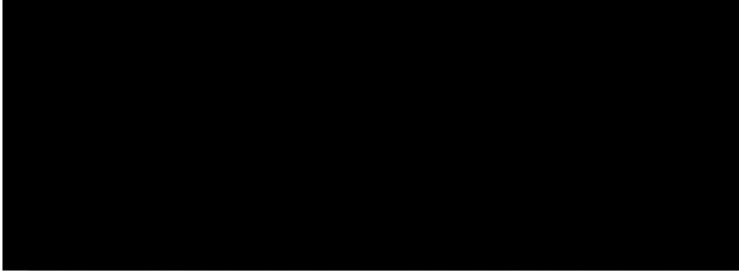
FAO Universal Destinations and Experiences:

- * Wixams Parish Council welcomes and supports the development of a Universal-branded theme park and entertainment resort south of Bedford.
- * We appreciated your 2024 public engagement exercise, which showed strong support for the project and its economic potential at local, regional, and national levels.
- * We value the transparent, professional engagement your team has maintained with local elected officials and the community throughout the planning process, especially the several meetings with Gidon Freeman and John McReynolds.
- * Wixams Town and surrounding villages, will be the largest population centre in our parish, located just east of your proposed site and will be directly affected by this development.
- * The planned 4 platform Wixams station on the Midland Mainline with EMR and Thameslink services is a long-awaited project that will greatly benefit our residents, and we support its inclusion.
- * We are pleased to see proposals for direct slip roads from the A421 into your site to limit the impact of construction, staff, and visitor traffic on local roads.
- * However, as we mentioned when we last met, we are concerned about traffic management and enforcement related to rail commuters and visitors attempting to avoid parking charges by using Wixams as an unofficial park-and-ride.
- * We are therefore grateful that you confirmed you would work with relevant authorities to ensure proper controls are in place to prevent traffic overflow or misuse of residential areas, noting that parking restrictions in residential areas are the responsibility of the local authority.

* While additional resources for local public services are outside the remit of your planning application, we will continue to advocate for them in other forums.

* We look forward to ongoing constructive engagement as your plans progress and hope to maintain a positive partnership as this project develops.

Sincerely,



Chairman, Wixams Parish Council

████████████████████
Universal Destinations & Experiences
1000 Universal Studios Plaza
Orlando
FL 32819

18 June 2025

RE: Milton Keynes Bus Service

Dear Mr McReynolds/Mr Williams

The purpose of this letter is to express Milton Keynes City Council's (MKCC) support and encouragement to UDX to its Planning Proposal to provide an Entertainment Resort Complex (ERC) including a Theme Park and associated facilities at Bedford (the UDX Planning Proposal).

In particular MKCC acknowledges that an element of the proposal envisages train passengers on the East West Rail (EWR) line, and the West Coast Mainline (WCML) alighting and embarking at Milton Keynes Central station and being bussed between there and the Planning Proposal site. MKCC supports that and considers it a benefit to the profile and economic growth of Milton Keynes. It welcomes the partnership.

Whilst Network Rail own the railway infrastructure and station buildings, MKCC owns and operates the bus stops and stands at Milton Keynes Central. These facilities are underutilised at present. They have the capacity for additional bus movements during peak periods and even greater capacity outside of those peak times.

MKCC is satisfied that the existing stops and stands, supplemented by additional off-site coach stands that can be created, have sufficient capacity to accommodate the demands for bus movement envisaged in the UDX transport assessment, the numbers for which you have shared with us, with some to spare. We particularly note that the peak time for movement to and from the UDX Planning Proposal site is complementary to the background peak period experienced at the bus station.

It is our intention, when the time comes, to investigate setting aside part of the bus area to provide a dedicated Universal (ERC) pick up and drop off facility to maximise the visitor experience to both Milton Keynes and Universal (ERC).

We advise that we have an ongoing aspiration to improve the quality of the bus facilities in station square. In considering the best way to do this we will be taking into account the bus demands to and from the UDX Planning Proposal site.

Leader's Office

peter.marland@milton-keynes.gov.uk

01908 253732

Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ

We acknowledge and consent to this letter being appended to the planning statement in the UDX Planning Proposal.

Yours sincerely

A large black rectangular redaction box covering the signature of the Leader of the Council.A black rectangular redaction box covering the name of the Leader of the Council.

Leader of the Council
Milton Keynes City Council

Cc MHCLG

**APPENDIX 5: AGRICULTURAL LAND CLASSIFICATION REPORT PREPARED FOR
PLANNING APPLICATION CB/18/04425/OAC**



AGRICULTURAL LAND CLASSIFICATION AND AGRICULTURAL CONSIDERATIONS OF LAND AT KEMPSTON HARDWICK FOR BEDFORD BUSINESS PARK



Landscape Land and Property Ltd
Village Farm
Thorncote Green
Sandy
Bedfordshire
SG19 1PU

Oct 2018



2015
International
Year of Soils

CONTENTS

- 1. Summary ALC Findings**
- 2. Introduction**
- 3. Methodology**
- 4. Agricultural Land Classification**
- 5. Results**
- 6. ALC Conclusions**
- 7. The Main Farming Operations**
- 8. Impact on Overall BMV Land Resource within Bedford Borough**
- 9. Appendices Annexes and References**

Plan 1 – Plan of ALC Grade

Plan 2 – Plan of Auger Locations

Appendix 1 – Evesham 3 and Rowsham Soil details

Appendix 2 – Section from Predictive and National ALC Maps

Appendix 3 – Soil map an Geological Map

Appendix 4 – Aerial Photo

Appendix 5 – Soil Colour Photo

Appendix 6 – Example Photographs from Auger Bores

1. SUMMARY ALC FINDINGS

1.1 The provisional ALC map identifies the majority of the general area as of Grade 3b land, with some small areas of Grade 3b and peripheral areas of non-Agricultural Character. Bedford Borough require information regarding the likely ALC grade of the land and its impact on the overall farming operation.

1.2 Our ALC survey results, undertaken in October 2018 revealed evidence of soil consistency across the wider site showing very little variation. Our survey has revealed this part of the site to be mainly Grade 3b (Medium) quality with a much small area of Grade 3a.

1.3 The soil texture and climatic data of the site and our findings indicate that there is very limited variability of soils across the site such that the soil type is generally consistent with the Evesham 3 Association, as reported by the Soil Survey of England and Wales and detailed in **Appendix 1**. The topsoil samples showed little or no evidence of naturally occurring lime following tests with dilute hydrochloric acid.

1.4 Having undertaken desk top research including studying the geological and soil maps and other published data, soil auger bores were taken to ascertain soil characteristics in line with national ALC guidance. With these findings and based upon our own soil survey together with data sourced locally, we consider the ALC Grade of the surveyed site is mainly Grade 3b in character, with a small amount of Grade 3a. Other areas not surveyed are considered non-Agricultural and comprise small areas of woodland shelterbelt and a much larger area of brickworks and former clay pits.

2. INTRODUCTION

2.1 Cloud Wing UK Limited instructed Landscape Land and Property to confirm the Agricultural Land Classification of this site. We have assessed the fields to which this application relates. The land as shown on soil maps, aerial photographs and from old provisional agricultural land classification maps and national data to be more identified as mainly Non Agricultural Land with some areas of Grade 3.

2.2. We made a preliminary detailed visual inspection of the site to survey boundaries and local characteristics. A detailed appraisal involving soil auger bore samples and soil pits was undertaken subsequently.

2.3 In addition there was a discussion undertaken with landowner's representatives and tenant farmers regarding the land use, history and agricultural practices undertaken at the site.

2.4 The total area of the site is 218.9 hectares. However only 130 hectares was surveyed for soil sampling.

3. METHODOLOGY

3.1 Having undertaken desktop research, we visited the site comprising several fields south of Bedford, at Kempston Hardwick and Wootton Broadmead in order to take auger core borings and soil samples using an Edelman (Dutch) Auger to a depth of 120 cm to examine the soil profile in regular locations on the fields. In addition aerial photographs, old maps and soil and geological maps were studied, as well as information provided by the tenant farmer landowner and agents. Other local ALC reports were also studied, several of which adjoin the site.

Baseline Conditions Description

General features, land form and drainage

3.2 The surveyed site extends to approximately 130 hectares of mainly arable farmland, as outlined in **Plan 1**. The site forms part of a wider land holding which includes the former brickworks of Kempston Hardwick and former clay pit. The site is bounded on the southern side by a road and the former Stewartby brickworks. The eastern boundary consists of the

Stewartby pit and former Coronation Brickworks site. The northern boundary is the former Coronation Brickworks site and western boundary mainly the Bedford to Bletchley railway. The total area of the investigated site is approximately 130 hectares and the wider site 218 hectares. The land is divided into six fields, of which one, the largest dominates at more than half the area.

3.3 The site is broadly flat and the local Ordnance Datum (AOD) height is 35m, with the contour essentially surrounding the site.

3.4 A full range of tests were undertaken including:

- Soil horizon depth assessment
- Matrix colour assessment using a Munsell Chart
- Soil texture assessment
- Soil structure
- Mottling
- Gleying
- Evidence of semi-permeable layer
- Stone content and size
- Evidence of naturally occurring chalk or limestone in the top 25cm of soil.

3.5 Selected auger profiles were photographed and recorded at site and samples were collected and retained for further analysis.

3.6 Further assessments were undertaken utilising the site data to calculate such factors as:-

Climatic Limitations

- Flood Risk
- Droughtiness
- Wetness Class
- Average Annual Rainfall
- Accumulated Temperature (from January to June)

3.7 Utilising this standard data we were able to calculate the land Grades for the area.

Agro Climatic Conditions and Altitude data

3.8 Agro climatic data for the area have been interpolated from the meteorological office's standard 5km grid point data set at a representative altitude of 35 metres AOD. The data shown in **Table 1** is the local agro climatic factors affecting the site. The site is relatively dry and moderately warm with a medium soil moisture deficit. The number of field capacity days is typical for lowland England and is considered to be acceptable for providing opportunities for autumn agricultural field working.

3.9 The annual average rainfall is approximately 579 mm which is low by national standards. Soils are likely to be at field capacity for a relatively short period of approximately 104 days. During this time the workability of the land will be Impaired because of the relatively slow permeability of the clay subsoil.

3.10 There is some plant-water demand in this low to medium rainfall area and unirrigated land can suffer slightly from drought. There is no available water on the site to fully sustain crop growth in the form of irrigation and therefore it is expected that grass yield can be slightly affected by summer drought.

3.11 There are no significant climatic limitations to Grade 1 across the site.

Table 1

Grid Reference	TL: 025 440
Altitude	35m
Average annual rainfall	579 mm
Accumulated temperature>0°C(Jan-June)	1440
Moisture deficit, wheat	118
Moisture deficit, potatoes	113
Field capacity period	104

Soil parent material, geology and soil types.

3.12 The published small scale (1:50,000) geology map sheet 203 Bedford (Institute of Geological Sciences, 2010) shows the site to primarily comprise of Peterborough Member (formerly Oxford Clay) and described as mudstone; brownish-grey, organic rich interbedded with grey calcareous mudstone beds. There are small areas of clay 'head' and alluvium, around 5-10% of the area surveyed. The underlying geology at the site is heavy clay which is exposed across the vast majority of the area.

Drainage and Flood Risk

3.13 The Environment Agency website confirms part of the site, west of the railway line does have significant flood risk and therefore this is likely to affect the ALC grade. Most of the land is undrained and due to the heavy clay subsoil is very slowly permeable and this is known to affect cropping and land use.

4. AGRICULTURAL LAND CLASSIFICATION PROCESS

4.1 The site was assessed by applying the survey details as outlined in Guidelines for Agricultural Land Classification (October 1988) by the Ministry of Agriculture, Fisheries and Food.

4.2 The current classification system was adopted in 1988 and is a refinement of previous systems. A series of Provisional ALC maps were produced at a scale of 1 inch to 1 mile between 1967 and 1974 based on the earlier classification system, and were intended to be for guidance only for strategic planning purposes. A new series of soil maps at a scale of 1:250,000 based on the same information are available. The 1 inch map shows the majority of the land to be Non Agricultural with a small area of Grade 3 and the 1:250,000 map for the area shows the land to be Grade 3 as shown in **Appendix 2**. The MAGIC Map shows the land to be mainly non-Agricultural and partly Grade 3. **Appendix 3** shows the soil type locally.

4.3 The Agricultural Land Classification system provides a framework for classifying land according to the extent to which it's physical or chemical characteristics impose long-term limitations on agricultural use. These limitations can affect the range of crops that can be grown, the level of yield, the consistency of yield and the cost of obtaining it. The principal factors considered are **Climate, Site and Soil**. These factors, together with **Interactions** between them, form the basis for classifying land into one of five grades more particularly set out in Annex A:-

- Grade 1 is land of excellent quality.
- Grade 2 is very good quality agricultural land
- Grade 3 is medium to good quality and is divided into Sub-Grades 3a and 3b since this Grade covers about half of the agricultural land of England and Wales.
- Grade 4 is land of poor quality
- Grade 5 is very poor land

4.4 The Grade or Sub-Grade is determined by the most limiting factor present. On this site there is no limitation to Grade according to **Climate**.

4.5 The assessment of **Site** factors considers the way the topography affects agricultural machinery use and crop production. The site comprises flat land at 35m Above Sea Level (ASL) and the topography fundamentally offers no restrictions to agricultural use and cropping potential.

4.6 The main consideration in applying the ALC system on this site, therefore relates to **Soil** factors and **Interactive** limitations. The main **Soil** properties, which may affect cropping potential, are:-

- texture
- structure
- depth
- stoniness and
- chemical fertility

4.7 The land has been actively farmed for generations and there were no overriding limitations caused by the individual soil factors. Free calcium carbonate was tested using dilute hydrochloric acid at all horizons in each soil profile.

4.8 The remaining consideration for ALC grading on this site relate to **Interactive** limitations, principally wetness and droughtiness.

4.9 Wetness Class assessments have been completed on the representative soils and show that the soils have significant impeded drainage and would fall into Wetness Class III and are mainly Grade 3b on account of this factor.

4.10 With the exception of small areas of non-Agricultural Land, the majority of the agricultural land within the site has been assessed as Subgrade 3b (moderate quality agricultural land) due to a significant wetness and workability limitation. Smaller areas of loamier soils were found to be Grade 3a, though the subsoils were very similar.

4.11 Though small areas of 3a have been identified these are mostly found in fields with larger areas of Grade 3b, which therefore tends to predominate and provide the overall limitation to cropping, land use and timeliness of operations.

5. RESULTS

Soil Type

5.1 The Soil Survey of England and Wales have mapped the soils in the Kempston Hardwick area on two occasions; in 1965 at 1:63,360 scale and in 1983, at a reconnaissance scale of 1:250,000. These maps show the occurrence of soils derived from Jurassic and/or Cretaceous Clays, namely the Rowsham and Evesham 3 Associations respectively. Profiles typically comprise very slightly stony, non-calcareous heavy clay topsoils immediately over very slightly stony slowly permeable clay.

5.2 Evesham 3 (411d) is described in detail in **Appendix 1** with information taken from the Cranfield University Landis, website, 'The Soils Guide'. They are summarised as slowly permeable seasonally waterlogged clayey soils mostly with brown subsoils. Some fine loamy over clayey and fine silty over clayey soils and, locally on slopes, clayey soils with seasonal waterlogging.

5.3 The more detailed 1:63,360 scale soil map (Soil Survey, 1968), maps the site as the Rowsham Association of non-calcareous gley soils, briefly described as clay, clay loam, or sandy clay loam over clay loam or clay with distinct ochreous mottling.

5.4 During this more detailed survey, the soils within the site were found to mainly comprise stone less to very slightly stony clay or heavy clay loam topsoil which overlies a similar textured mottled clay subsoil. Where present the stones comprise very small and small sub-angular flints. Occasionally small chalk fragments were evident deep in the soil profile. However, generally these profiles are non-calcareous or only very slightly calcareous throughout, only becoming calcareous at depth (c 60-70 cm+), where calcium carbonate fragments are present.

5.5 This main soil type was identified which corresponds to the Rowsham Association and was found to have a clay or heavy clay loam textured topsoil. This soil type is shown to occur over the main part of the site. The heavy clay textured subsoil was found to be poorly structured and slowly permeable which acts to impede soil drainage and constitutes a slowly permeable layer. This is indicated by gleying and mottling at shallow to moderate depths (25-40 cm) and distinct ochreous mottling within the soil profile is evident to-depth, the profiles were therefore assessed as poorly drained, Wetness Class III.

5.6 In small areas over the remainder of the site, a few profiles typically comprise non-calcareous, very slightly stony, medium clay loam topsoils over slightly stony heavy clay loam (occasionally clay) upper subsoils. Lower subsoils vary from stone less slowly permeable clay to moderately stony sandy clay loam or clay with sandy loam lenses thus reflecting the variability of the drift deposit.

5.7 In two small areas and occasionally interspersed within the soils described in paragraph 5.4 above soils comprising slightly sandy clay loam topsoils over very slightly stony, or stone less gleyed clay subsoils occur. These soils are calcareous in the lower horizons where calcium carbonate fragments occur. Where they occur, the stones comprise very small and small sub-angular flints.

5.8 Soil profile pit observations indicate that soils are moderately droughty and poorly drained (i.e. wetness Class III),

5.9 Soil Moisture Deficit (SMD) represents the balance between rainfall and potential evapotranspiration occurring during the growing season. For ALC purposes the soil moisture deficits developing under a winter wheat and main crop potato cover are considered. These reference crops have been selected because they are widely grown, and in terms of their susceptibility to drought, are representative of a wide range of crops.

6. CONCLUSIONS REGARDING THE AGRICULTURAL LAND CLASSIFICATION

6.1 Based on the findings from our survey of the site, we consider that there is consistency of the main soil types being primarily clay and heavy clay loam soils and the Agricultural Land Classification Grade is Grade 3b, due to the heavy textured soils and wetness class, which affects soil workability and timeliness of cultivations. Smaller areas of the site were also found to contain areas of Grade 3a land, where topsoils were slightly loamier.

6.2 Within the time available, we were able to undertake an ALC assessment of the area and based on the sample findings, we found that the ALC Grade across site did not vary greatly.

Subgrade 3a

6.3 The subgrade 3a land on site corresponds to less well drained profiles within the soils described in paragraph 5.6 and 5.7, with medium clay loam or sandy clay loam topsoils. These profiles have been assessed as Wetness Class III. This factor, combined with the topsoil textures present, imposes a moderate wetness and workability constraint which limits the land to subgrade 3a.

Subgrade 3b

6.4. Land of subgrade 3b predominates the site and corresponds almost entirely to the soils described in paragraph 5.4. The heavier textured clayey or fine loamy topsoils have a more severe workability restriction and this combined with the slowly permeable subsoils (assessed as Wetness Class III) to impose a significant wetness and workability limitation. In neither situation can the land be graded higher than subgrade 3b.

6.3 Therefore in our opinion the land is mainly Grade 3b, with small areas of Grade 3b and some mainly peripheral areas of non-Agricultural land, mostly consisting of woodland or shelterbelts.

7. THE FARMING OPERATIONS

7.1 It is clear from the application site that there is additional land within the control of the landowners locally. A large part of the overall development site is non-Agricultural, however that which is farmed is occupied by 2 tenants. The land generally does not make up the bulk of their holdings. Conversations with the occupiers suggest that the land can be difficult to farm particularly in wet autumns, as none of the land is under drained. The block of land on the west side of the railway line is subject to localised flooding, particularly near the brook.

7.2 There are no farm buildings associated with the application site and none of the land has been under drained.

7.3 The total area proposed is around 220 hectares, however the land assessed for ALC extends to around 120 hectares, the remaining areas not being assessed due to the industrial legacy.

7.4 This particular land has been cultivated for arable for many years but may have been partially in grassland in the past. Over time small fields have been combined to create fewer larger blocks of land. The land is not itself marginal for arable production, but the lack of under drainage makes spring cultivations impossible in most years and autumn cultivations difficult. The land is often at field capacity or waterlogged for long periods in the early spring.

7.5 The tenants will lose the land for farming purposes and will lose an amount of agricultural subsidy entitlements on this land. The loss of the land to development will therefore be permanent and represents the loss of around 104 ha of Grade 3b (non BMV quality) and 12 hectares of Grade 3a (BMV land).

8. IMPACT ON OVERALL BMV LAND RESOURCE WITHIN BEDFORD BOROUGH

8.1 The Eastern region of England generally has the highest proportion of higher Grade land (Grades 1, 2 & 3a), with Bedford Borough having greater amounts of BMV than the average for the East. There is virtually no Grade 4 or Grade 5 land in Bedford Borough and only 3% of the Borough classified as Grade 1 (concentrated in the Ouse and Ivel Valleys). Any significant development in the Borough north of the river and East of the west coast railway line therefore is inevitably likely to involve higher grades of land. The bulk of lower grade land (Grade 3) is south west of Bedford and largely confined to the Marston Vale.

8.2 The overall site is seen as Non Agricultural in character reflecting past planning consents for the brick making industry which dominates the historic land use in the immediate locality. This is reflected in the DEFRA Predictive Best and Most Versatile maps of the area, which shows the likelihood and BMV as 20% likelihood over only a part of the site and no BMV over the remainder. The Grade 3b status of over 80% of the farmed land means that very little of the site is actually BMV.

9. Regional Agricultural Land Classification Position

Eastern Region ALC Land Use and Quality

Land Use

9.1 Around 76% of the land in the East of England region is currently used for Agriculture. This region is the most intensively cropped in England.

9.2 In the East of England region there are currently 1.5 million hectares of land in agricultural use managed by 25,000 farm holdings. Arable farming is the predominant agricultural land use in the Region, making up nearly 70% of the total agricultural area. This is more than any other Region in England. 8,500 farms are involved in cereal and general cropping which makes up 38% of the number of total holdings. The average farm size in the region is 73 hectares compared to an average across England of 55 hectares. 4,300 farms are bigger than 100 hectares.

Land Quality

9.3 The geology, climate, relief and rainfall form the basis of the eastern region's high quality agricultural land. The region has 58% of the country's national resource of Grades 1 and 2 land. This land is capable of growing the widest range of agricultural and non-agricultural crops and is the most responsive to inputs. Only 10% of agricultural land in the region falls into the lower quality Grades 4 and 5.

Geology

9.4 The eastern region comprises a general solid geology distribution of sandstone in the east, chalk and limestone in central areas and clay rocks in the south and west. Major aquifers are located within the sand, chalk and limestone permeable rocks. This groundwater is important for domestic, industrial and agricultural use. Abstractions from the aquifers provide nearly half of the region's total water supply.

9.5 The main area of excellent quality, Grade 1, agricultural land in the East of England occurs in the low lying Fens, where soils are developed in marine silt or deep peat. Limitations to the use of this land are minimal; in addition to a wide range of arable crops, horticultural and fruit crops are also widely grown. The peaty fen soils have wasted over time through oxidation following their drainage and conversion to crop production. As a result the peat continues to shrink and suffer erosion, which threatens the land quality.

9.6 Land of good to moderate quality, Grades 2 and 3, is widespread throughout the region and corresponds to a wide range of soil types. Soils developed from boulder clays dominate, these are mostly drift covered chalk soils and lowland clays. Less extensive are soils derived from clay with flints.

9.7 Land of poor quality, Grades 4 and 5, is mainly concentrated in the Norfolk and Suffolk Brecklands. In this area soils consist of sands and loamy sands. This land is typically very droughty and in the absence of irrigation is only suited to cereal growing. Many parts of this area are under heathland and forest.

9.8 **Figure 1** combines the factors of climate, relief and soil type to demonstrate the regional land quality and agricultural land use. The principles of sustainable development will guide land use decisions within the region.

Figure 1 Eastern Region ALC Map









The Fen Silts

- Grade 1, excellent quality agricultural land
- The most productive soil type
- Located mainly in the fen lands. Other grade 1 soil types are located in Essex and NE Norfolk
- Lowest lying areas, average annual rainfall 560mm
- Used to grow high value horticultural and fruit crops

Peat and Skirt Soils

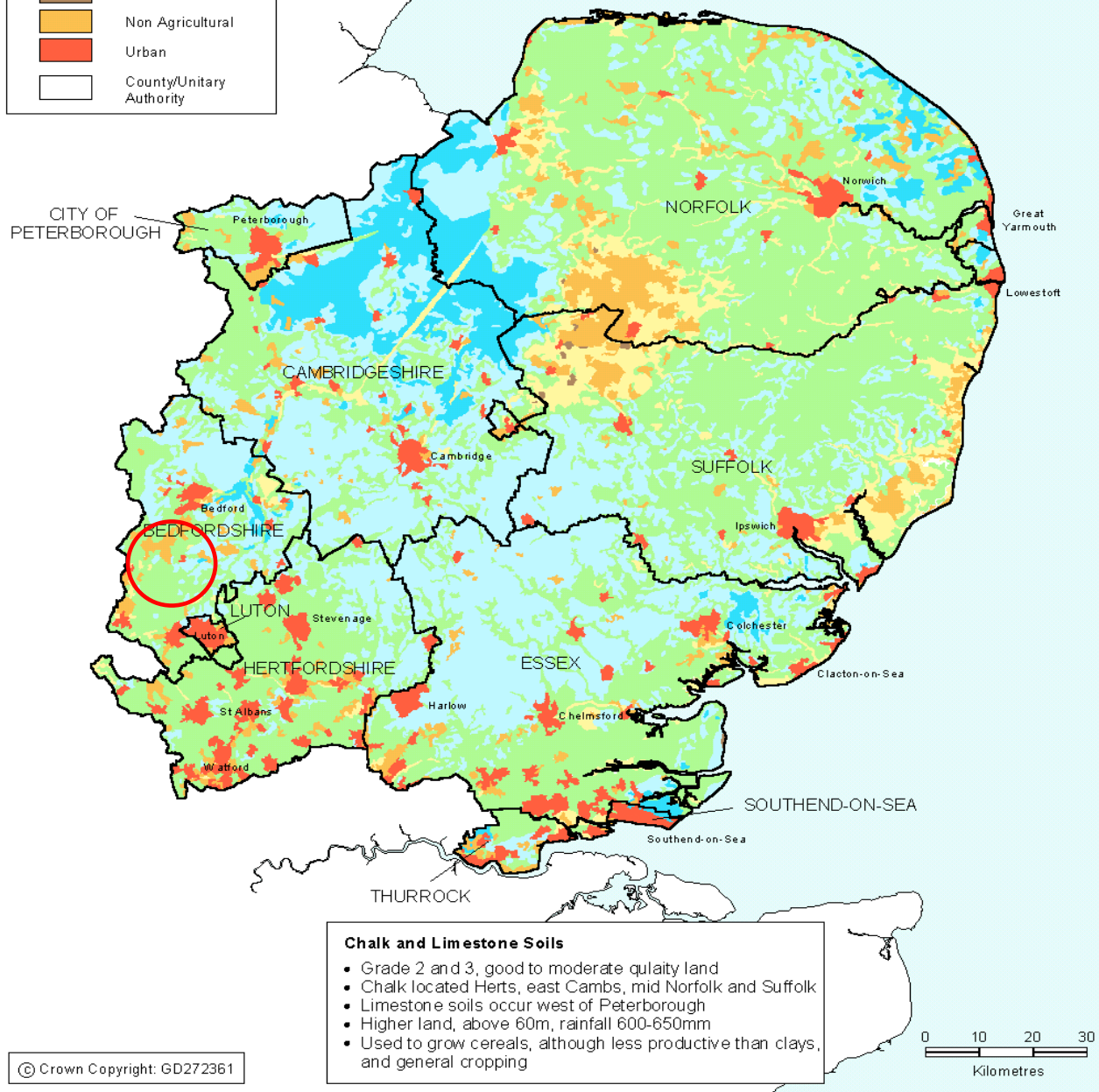
- Grade 1 and 2, some grade 3, good quality agricultural land
- High productivity although quite variable
- Located bordering the fens
- Low lying areas, average annual rainfall 560-600mm
- Used to grow sugar beet and potato crops

ALC Grade

- | | |
|---|--------------------------|
|  | Grade 1 |
|  | Grade 2 |
|  | Grade 3 |
|  | Grade 4 |
|  | Grade 5 |
|  | Non Agricultural |
|  | Urban |
|  | County/Unitary Authority |

Sands and Loamy Sands

- Low quality grade 3 and grade 4, poor quality agricultural land
- Located in the Brecklands of Norfolk and Suffolk
- Low lying areas, average rainfall 550-600mm
- Free draining with problems of droughtiness
- Areas used for livestock, pig and poultry



Urban and non agricultural land

- Highest concentration of urban area in Essex and Herts
- Non agricultural land, located around Thetford where land is forested
- Also includes public amenity land, private park land and mineral workings

Clays and Boulder Clays

- Grade 2, some higher quality grade 3, good to moderate quality agricultural land
- Widespread across the southern half of the region, through central Suffolk and Norfolk
- Rolling landscape, average annual rainfall 600-650mm
- Used to grow cereals as produces high yields

10 Bedford Borough Agricultural Land Classification Position

Local Plan and Development Strategy Documents

10.1 The Strategy and Development Control Policies Submission Sustainability Appraisal Report acknowledges that development on agricultural land is inevitable. It confirms:-

- Bedford has and virtually no Grade 4 or Grade 5 land according to the provisional map
- The District contains significant areas of (BMV) agricultural land, particularly Grade 2 and around 3% Grade 1 agricultural land – mostly concentrated in the Ouse and Ivel valleys East of Bedford
- Bedford Borough contains 64.2% Grades 2 and 3, whereas East of England contains 58% of the country's national resource of Grades 1 and 2
- In Bedford, the largest amount of agricultural land is Grade 2 with significant localised areas of Grade 3 (undifferentiated between 3a and 3b)
- The majority of Grade 3 land is in the south of the borough in the Marston Vale south/west of Bedford, whereas the higher Grades of 2 and 1 are concentrated in the north/eastern part
- Issue: Limited stock of previously developed land means new development will result in the loss of agricultural land
- Therefore it is inevitable there will be significant pressure on undeveloped land to accommodate the Borough's development need

10.2 There is a clear division across Bedford Borough with most of the BMV land in the northern half of the district and the poorer Grade 3 land in the south/western part, as shown in **Figure 2**. With limited Grade 1 land and virtually no Grades 4 and 5. This site being mainly non-agricultural or mostly Grade 3b meets the criteria set out.

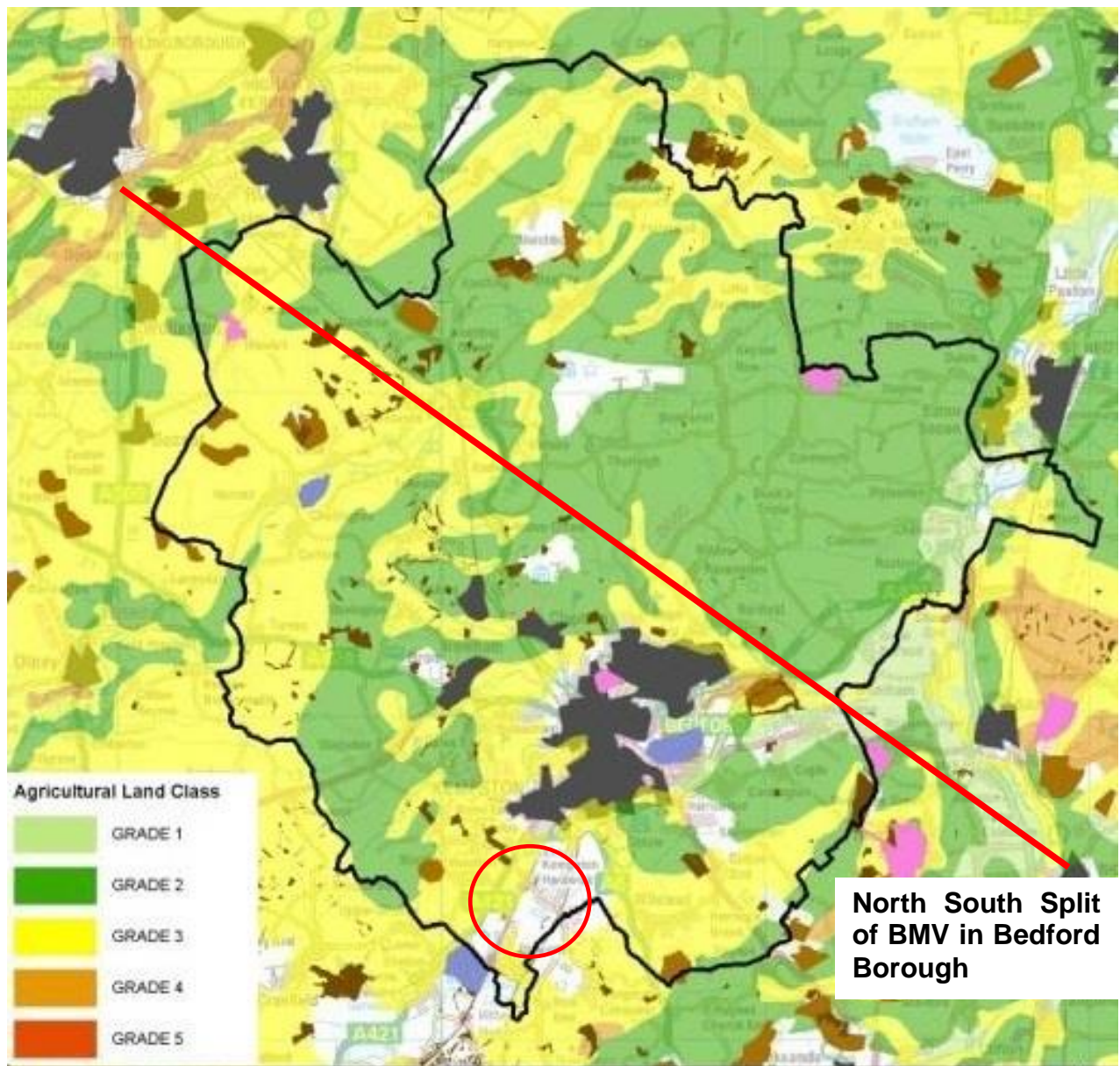
10.3 **Figure 2** shows the distribution of ALC Grades across Bedford Borough and the clear north-south distinction.

10.4 The Map shows a general division between the North and South of the Borough for higher quality land, with the majority of land in the north of likely BMV quality.

10.5 Given that the land proposed for this site is considered to be mostly Grade 3b with only 15 hectares falling within the BMV category, the remainder being only non-Agricultural, I do not consider that the loss of the BMV land would be significant to the Borough.

10.6 There may be some very minor impact on the agricultural productivity of the farming operations, but alternative land may be available on the wider estate. Being mostly Grade 3b means that the proposal does not conflict with NPPF policy to protect BMV land.

Figure 2 ALC Grades across Bedford Borough



10.7 The land use is proposed permanent and would involve buildings and surfacing and it is unlikely to be returned to agriculture and does represent the loss of a small area of BMV quality land and a larger area of non BMV land. Some of the landscaped areas could be returned to agriculture in theory, but even if the land is not returned to full agricultural use, I consider that the overall impact will be small, both on the farms and within Bedford Borough.

Landscape Land and Property Ltd
October 2018

0411c EVESHAM 3**Detailed Description**

This association covers 816 km² on low ground on Jurassic and Cretaceous clays, mainly in Cambridgeshire and Bedfordshire but also in Somerset and Leicestershire. The soils are mostly slowly permeable clayey or fine loamy over clayey, usually calcareous and are seasonally waterlogged. They are formed in clay or mudstone bedrock which is patchily covered by thin drift. The Evesham series, which belongs to the calcareous pelosols, is the main soil, covering about two-fifths of the land. The fine loamy over clayey St Lawrence soils are stagnogleyic brown calcareous earths, which together with the similar but non-calcareous Oxpasture series occupy a further third of the association. Denchworth and Lawford series, both pelo-stagnogleys, the former formed in mudstone and clay, the latter with upper layers in clayey drift, also occur and are often waterlogged for longer periods than the Evesham series. The coarse loamy moderately permeable Wick and the fine loamy Waterstock series are locally important where there are thick, river terrace drifts.

The Evesham series is often found on sloping ground and on knolls, whereas the Denchworth series generally occurs on drift-free concavities and more gentle slopes. The St Lawrence, Oxpasture and Lawford soils occur on low ground where it is thinly covered by drift. In Eastern England, the land is mostly arable and mainly in winter cereals, whereas in Somerset and Leicestershire it is mostly in grass.

The association covers 739 km² in Eastern England in the triangle between Peterborough, Cambridge and Luton and on raised ground in the Fens at Ely and near Soham. Evesham soils are variably mottled, many having grey mottles immediately below the plough layer, whilst others have a browner, relatively unmottled, upper subsoil horizon. Denchworth soils, non-calcareous in the upper layers, are usually calcareous within 1 m depth. The St Lawrence and Oxpasture series often contain sandy lenses usually just above an undulating stone line or thin stony layer at the junction between fine loamy upper layers formed in drift and a clayey subsoil. The fine loamy Hopsford series, which occurs locally with Wick soils, was previously described as Needham series.

In Somerset the association covers 66 km² north of Ilminster, near Crewkerne, at Glastonbury and Castle Cary. There is a small area at Longleat in Wiltshire. Lias clays containing thin limestone bands gives Haselor soils, and that covered by drift has Oxpasture and Lawford soils. Locally, on river terraces there is fine loamy Waterstock series.

Soil Water Regime

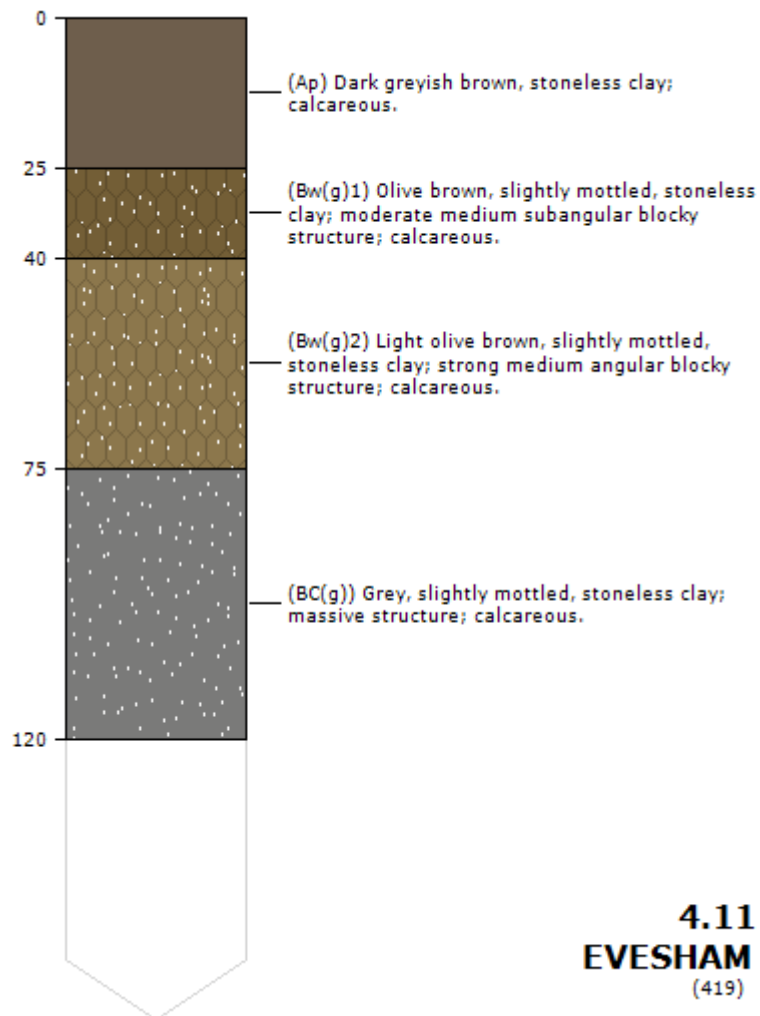
Evesham and Denchworth series as well as Lawford series have slowly permeable subsoils and are waterlogged in winter (Wetness Class III). Because of their slowly permeable subsurface layers the principal soils quickly become saturated in winter and rainfall runs off or passes laterally through the topsoil. Most component soils have a moderate to high water holding capacity, so in the dry climate are slightly or moderately droughty for cereals and oilseed rape, moderately droughty for potatoes and very droughty for grass.

Cropping and Land Use

In most years the series with clayey subsoils are at field capacity from late November or December to late March or early April and the soils are unworkable during this period. There are usually sufficient days in autumn for satisfactory cultivations, particularly in drier eastern districts. The soils are suited to direct drilling and minimum cultivations, which are now widely used. Periodic ploughing of the topsoil or subsoiling may be needed to alleviate compaction. In spring, opportunities for landwork are limited in wet years even on the drier St Lawrence and Oxpasture soils. The cropping system reflects the difficulties of spring landwork. Winter cereals

are the main crops with autumn sown oilseed rape and, occasionally, field beans as break crops. Potatoes are rarely grown and the land is unsuited to sugar beet because of the difficulties of autumn harvesting which damages soil structure. The soils naturally contain little phosphorus.

Brief Profile Description



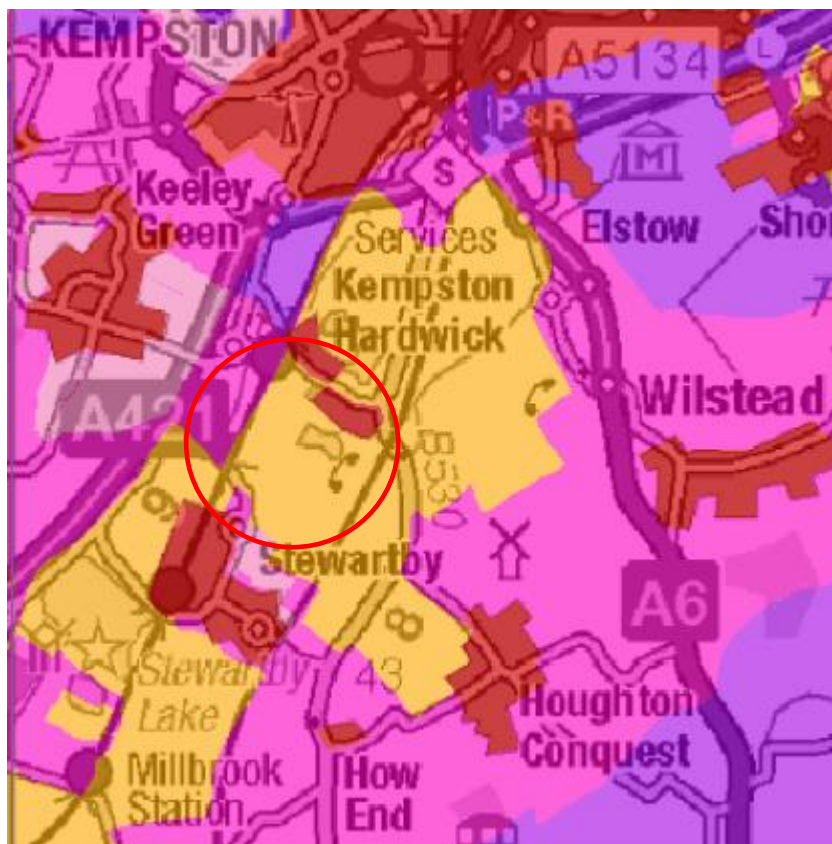
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Citation: To use information from this web resource in your work, please cite this as follows: Cranfield University 2018. *The Soils Guide*. Available: www.landis.org.uk. Cranfield University, UK. Last accessed 04/10/2018

The Rowsham Association: Soil Survey of England and Wales (DW King 1969)

The Rowsham Series is most widespread and is formed in a layer of clayey drift containing some stones and appreciable amounts of sand, often with a narrow gravelly seam immediately overlying the Jurassic clay at depths of between 18 and 36 in (460 and 920 mm). A dark brown clay loam or sandy clay loam' surface horizon overlies an olive or greyish brown clay loam to clay subsoil with distinct fine ochreous mottling. Below, a discontinuous seam of gravelly sandy clay loam overlies grey plastic clay faintly mottled with olive and brownish yellow, often with some small secondary calcium carbonate concretions

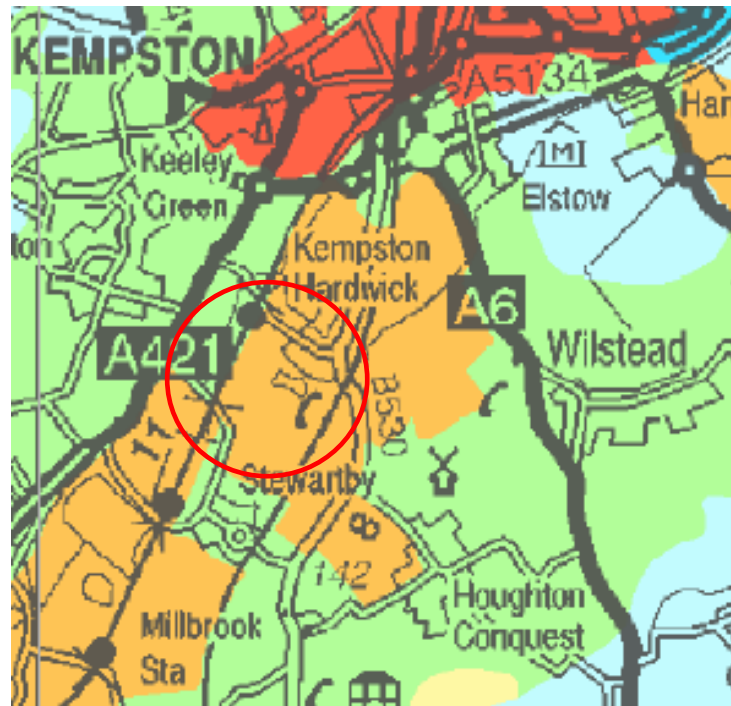
Figure 1 below is the DEFRA Predictive Best and Most Versatile Land Map.



Predictive BMV Land Assessment © Defra

- High likelihood of BMV land (>60% area bmv)
- Moderate likelihood of BMV land (20 - 60% area bmv)
- Low likelihood of BMV land (<= 20% area bmv)
- Non-agricultural use
- Urban / Industrial

Figure 2 below is the 1:250 000 scale map (South East) which shows the area as Mainly Non Agricultural with a smaller area of Grade 3 quality.

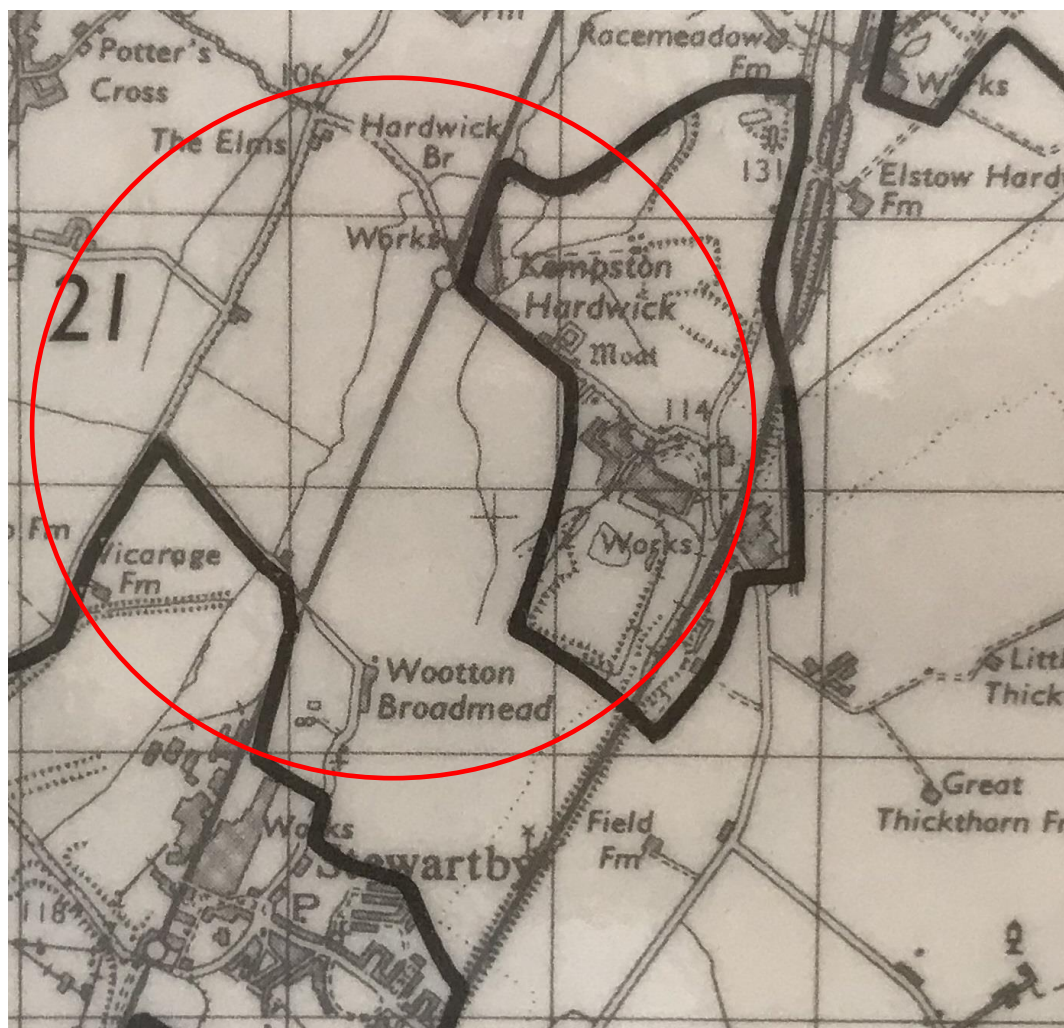
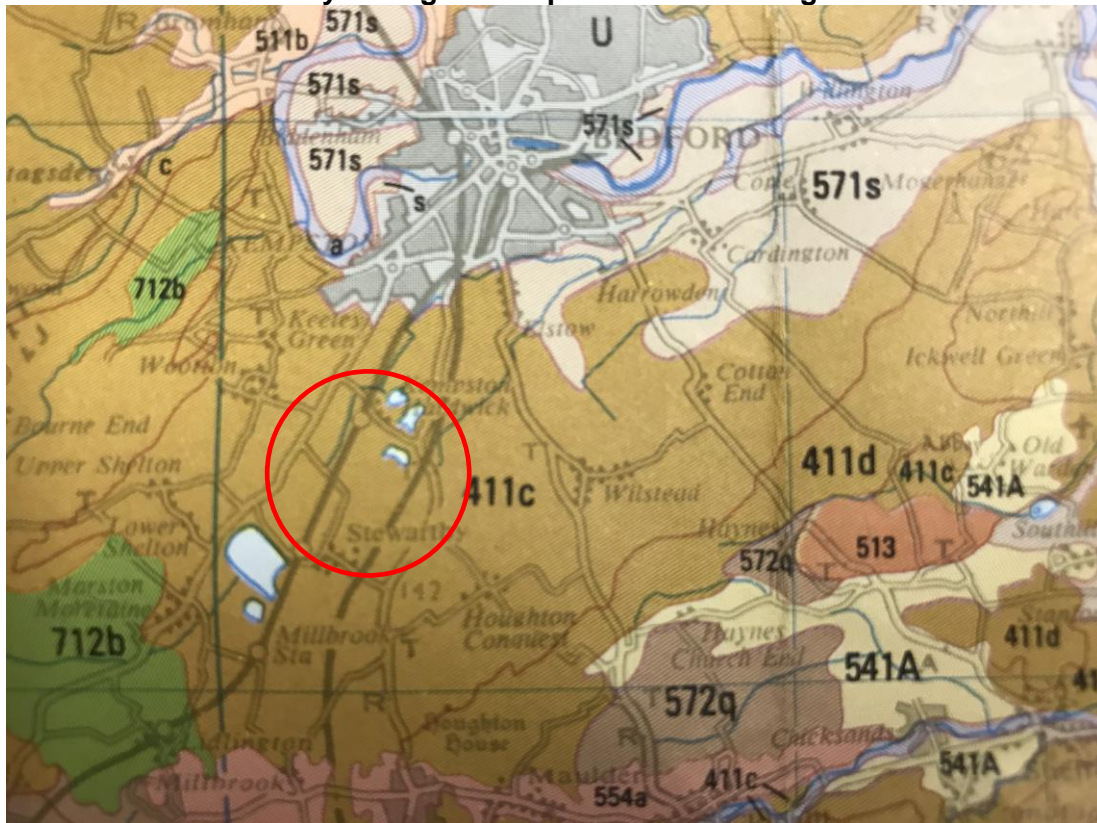


<u>Grade</u>	<u>Description</u>
1	Excellent
2	Very Good
3	Good to Moderate
4	Poor
5	Very Poor

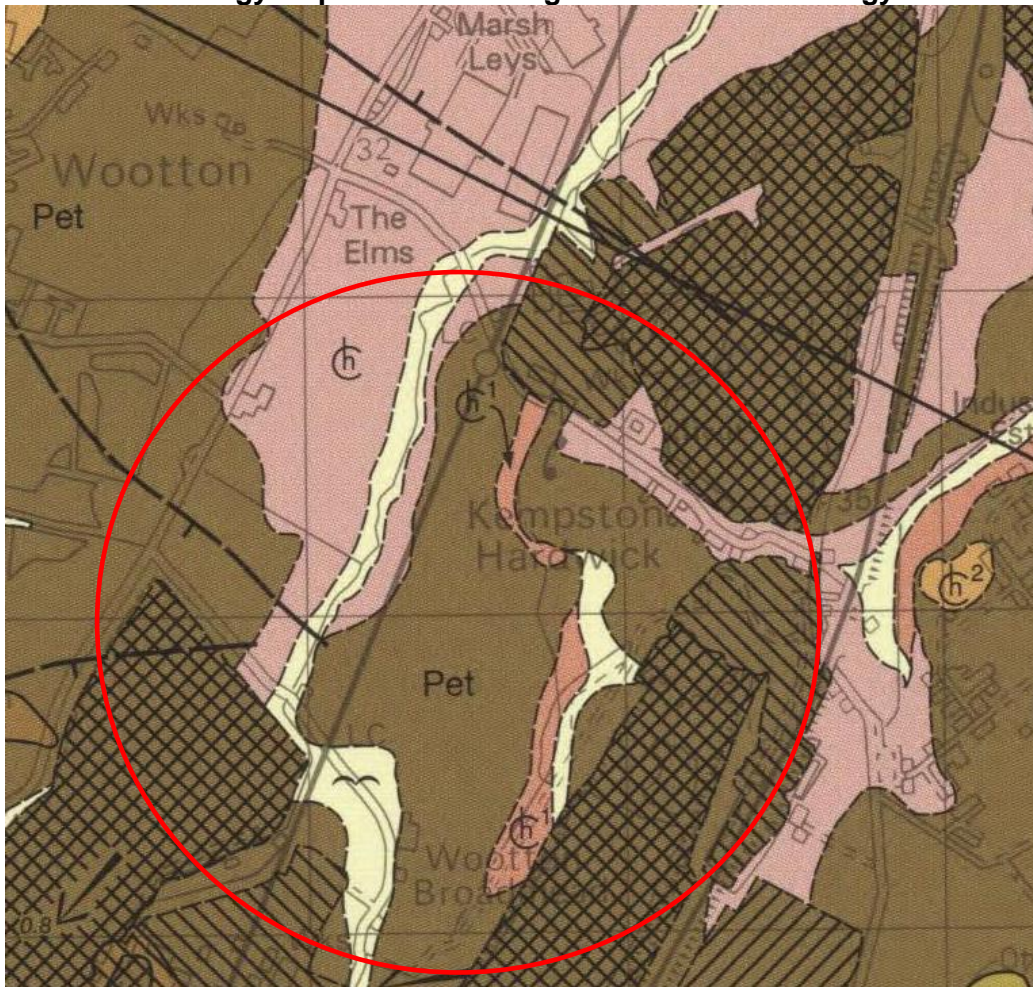
Non-Agricultural Land

	Other land primarily in non-agricultural use
	Land predominantly in urban use

Soil Survey of England Maps of Area showing the Site



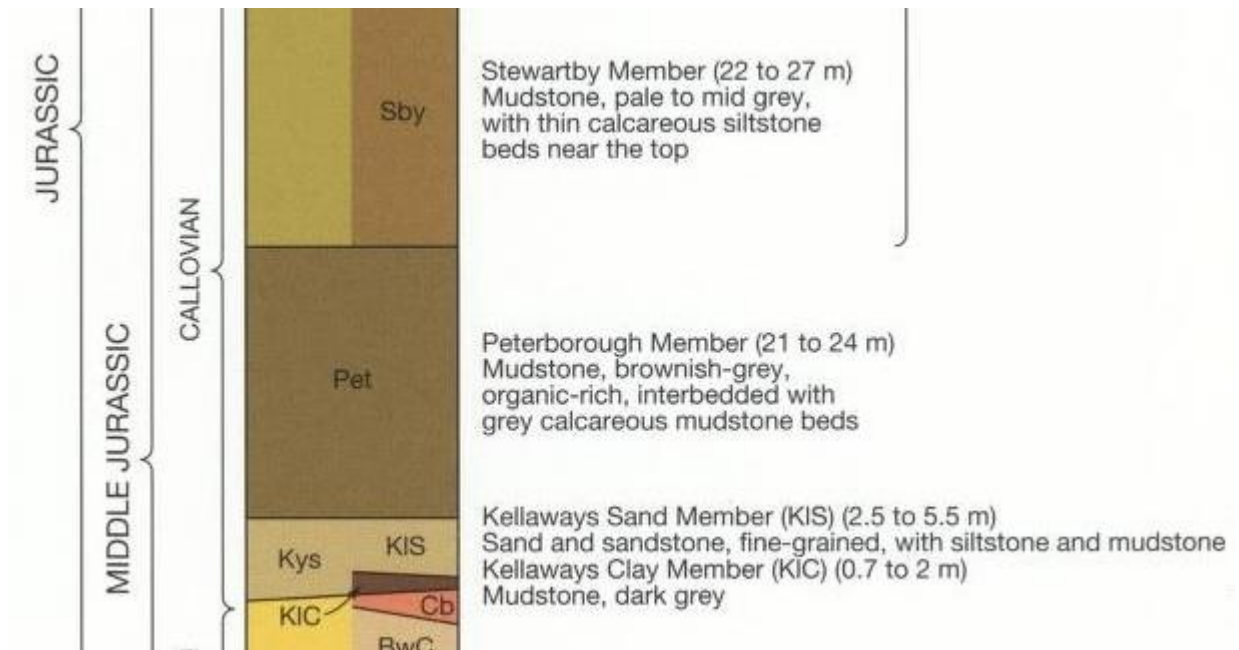
Geology Map of Site showing Drift and Solid Geology



NATURAL SUPERFICIAL DEPOSITS



Superscript numbers indicate successively older head deposits



Google Earth Aerial Photograph



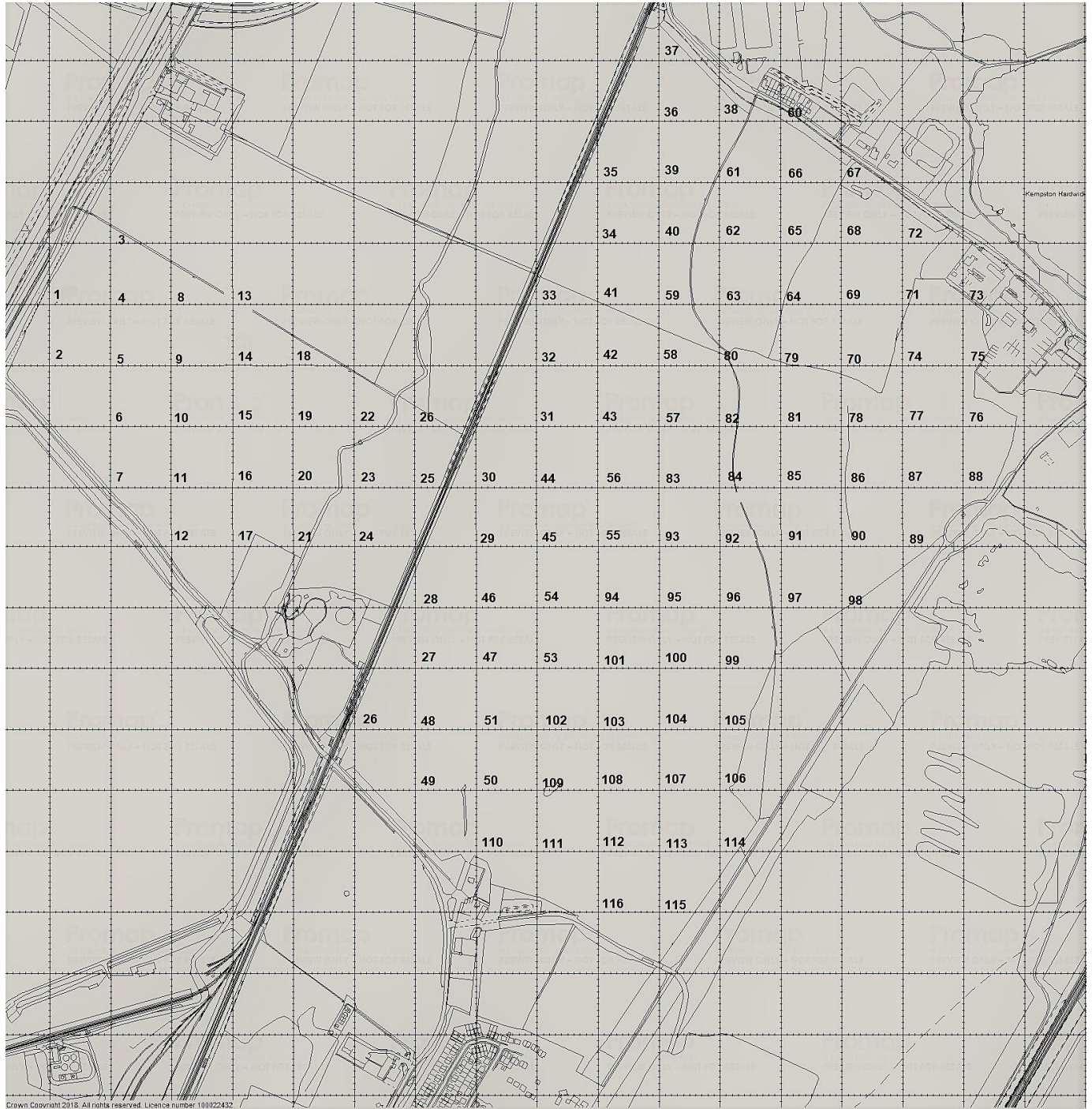
Soil Sample from Auger 37 (Horizon 1) with Munsell Chart



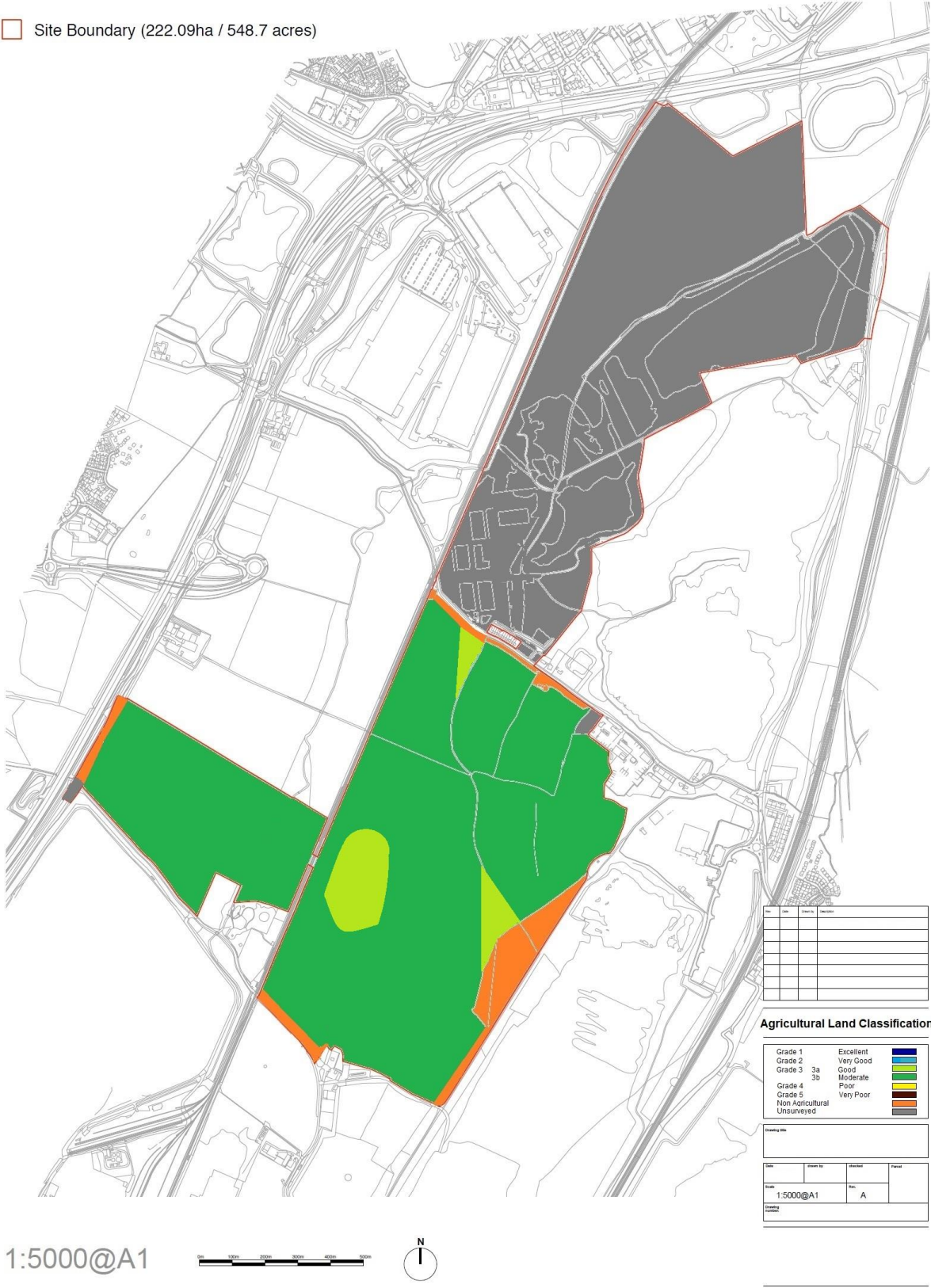
Example Soil Auger Profiles



Plan 1 Showing Auger Locations



Red Line Boundary 1:5000 @A1



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DEFINITION OF LAND CLASSIFICATION GRADES

Grade 1 - excellent quality agricultural land

Land with no or very minor limitations to agricultural use. A very wide range of agricultural and horticultural crops can be grown and commonly includes top fruit, soft fruit, salad crops and winter harvested vegetables. Yields are high and less variable than on land of lower quality

Grade 2 - very good quality agricultural land

Land with minor limitations which affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown but on some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops such as winter harvested vegetables and arable root crops. The level of yield is generally high but may be lower or more variable than Grade 1.

Grade 3 - good to moderate quality agricultural land

Land with moderate limitations which affect the choice of crops, timing and type of cultivation, harvesting or the level of yield. Where more demanding crops are grown yields are generally lower or more variable than on land in Grades 1 or 2.

Subgrade 3a - good quality agricultural land

Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of a wide range of crops including cereals, grass, oilseed rape, potatoes, sugar beet and the less demanding horticultural crops.

Subgrade 3b - moderate quality agricultural land

Land capable of producing moderate yields of a narrow range of crops, principally cereal and grass or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year.

Grade 4 - poor quality agricultural land

Land with severe limitations which significantly restrict the range of crops and/or level of yields. It is mainly suited to grass with occasional arable crops (e.g. cereals and forage crops) the yields of which are variable. In moist climates, yields of grass may be high but there may be difficulties in utilisation. The grade also includes very droughty arable land.

Grade 5 - very poor quality agricultural land

Land with very severe limitations which restrict use to permanent pasture or rough grazing, except for occasional pioneer forage crops.

Land in other categories

Urban

Built up or 'hard' uses with relatively little potential for a return to agriculture including: housing, industry, commerce, education, transport, religious buildings, and cemeteries. Also, hard-surfaced facilities, permanent caravan sites and vacant land; all types of derelict land, including mineral workings which are only likely to be reclaimed using derelict land grants.

Non-agricultural

'Soft' uses where most of the land could be returned relatively easily to agriculture, including: golf courses, private parkland, public open spaces, sports fields, allotments and soft-surfaced area on airports/airfields. Also active mineral workings and refuse tips where restoration conditions to 'soft' after-uses may apply.

Woodland

Includes commercial and non-commercial woodland. A distinction may be made as necessary between farm and non-farm woodland.

Agricultural Buildings

Includes the normal range of agricultural buildings and hard tracks as well as other relatively permanent structures such as glasshouses. Temporary structures (e.g. polythene tunnels erected for lambing) may be ignored.

Open Water

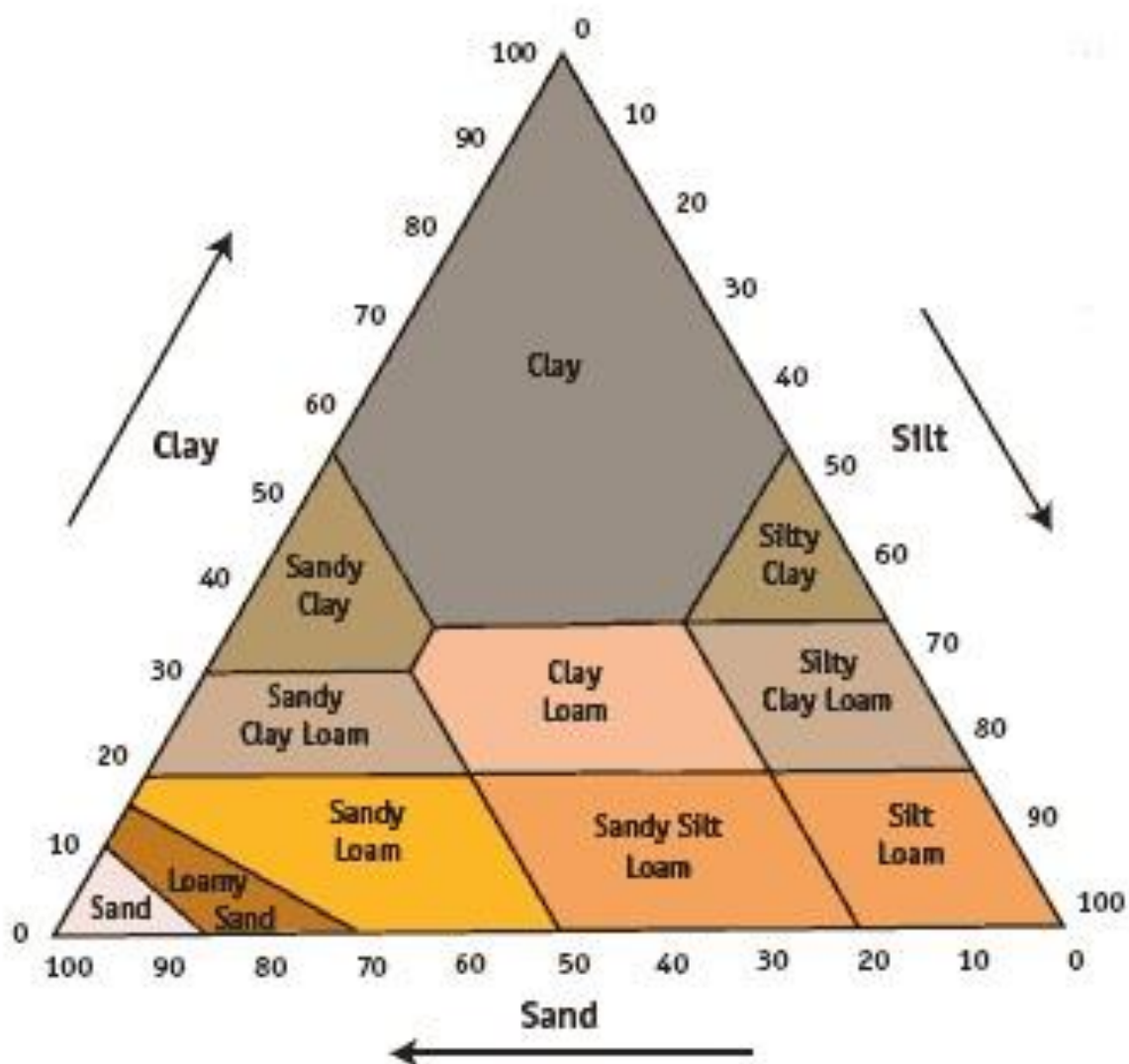
Includes lakes, ponds and rivers as map scale permits.

Land Not Surveyed

Agricultural land which has not been surveyed.

Where the land use includes more than one of the above land cover types, e.g. buildings in large grounds, and where the map scale permits, the cover types may be shown separately. Otherwise, the most extensive cover type will usually be shown.

Soil Texture Triangle



DEFINITION OF SOIL WETNESS CLASSES

Wetness Class	Duration of Waterlogging *
I	The soil profile is not wet within 70 cm depth for more than 30 days in most years.
II	The soil profile is wet within 70 cm depth for 31-90 days in most years <i>or</i> , if there is no slowly permeable layer within 80 cm depth, it is wet within 70 cm for more than 90 days, but not wet within 40 cm depth for more than 30 days in most years.
III	The soil profile is wet within 70 cm depth for 91-180 days most years <i>or</i> , if there is no slowly permeable layer within 80 cm depth, it is wet within 70 cm for more than 180 days, but only wet within 40 cm depth for between 31 and 90 days in most years.
IV	The soil profile is wet within 70 cm depth for more than 180 days, but not wet within 40 cm depth for more than 210 days in most years <i>or</i> , if there is no slowly permeable layer within 80 cm depth, it is wet within 40 cm depth for 91-210 days in most years.
V	The soil profile is wet within 40 cm depth for 211-335 days in most years.
VI	The soil profile is wet within 40 cm depth for more than 335 days in most years.

* the number of days specified is not necessarily a continuous period.

"in most years" is defined as more than 10 out of 20 years.

The calculation of Wetness Class assumes that the soils have an appropriate underdrainage system and that there are satisfactory outfalls. Additional land drainage measures would not improve the assessment.

APPENDIX 6: SOCIO-ECONOMIC BENEFITS OF THE PROPOSED DEVELOPMENT

Universal Destinations & Experiences UK Project

Appendix 6 – Socio-Economic Benefits of the Proposed Development

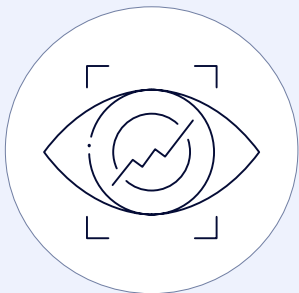
June 2025

Economic needs case

What is proposed?

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.

Contents of this report

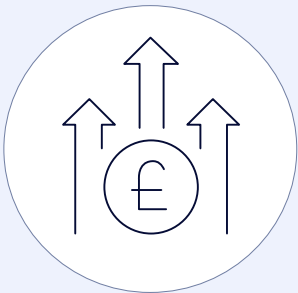


Background Context

This section provides background context on the UK economy, and the need for a major, world-class theme park and resort. This section also introduces the Proposed Development.

Gross direct employment

This section covers the gross direct employment generated by the Proposed Development in the construction and operational phase. This section also covers employment and skills contributions.



Net additional impacts

This section covers the net additional economic impacts generated by the Proposed Development on a UK-wide level. It specifically covers GVA net present value, tax net present value, and net additional employment.

Visitor expenditure impacts

This section covers the expected annual visitor numbers generated by the Proposed Development in the opening year and the twentieth year of operation. It also covers the additional expenditure generated by these visitors.



Background context

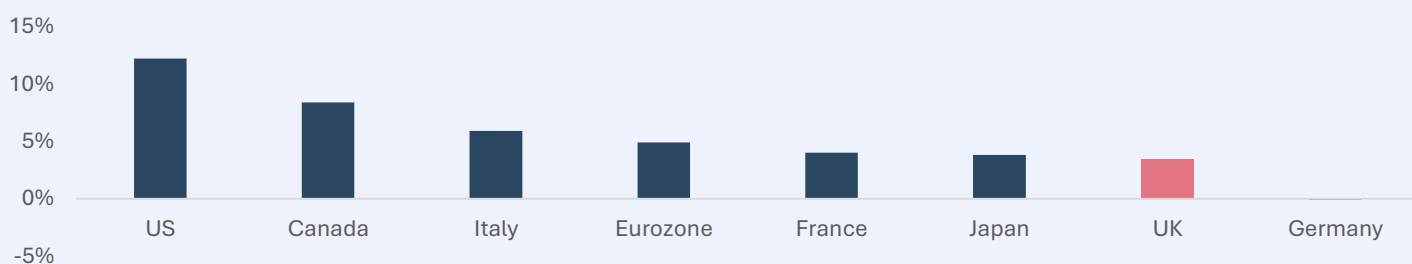
The UK needs a good growth story

There is an acute need for a step change in economic growth in the UK.

GDP growth slowed from an annual average of **3.0% between 1993 and 2007** to **1.5% between 2009 and 2023**.

The **UK has lagged behind other countries and regions in terms of real GDP % change compared to pre-pandemic levels**, with only a 3.4% increase.

G7 real GDP % change compared to pre-pandemic level (Q4 2019 – Q4 2024)



Source: UK Parliament, 2025. GDP – International Comparisons: Key Economic Indicators

The UK needs a world-class theme park

- *The Tourism Sector Deal states that in 2018 **UK tourism attracted 38 million international visitors**, contributing **£23 billion to the economy**, making it one of the **UK's most important industries and the third-largest service export**.*
- *Currently, the UK has **no theme parks in the global top 25 according to the AECOM Theme Index 2023**.*
- *Based on the size of the population and the number of international tourism arrivals, the **UK should have 2 – 3 of the top 25 global theme parks**.*
- *The largest Universal theme park had an attendance of **16.0m** in 2023, the largest in the UK had an attendance of **2.4m**.**
- *Research shows **domestic consumers increasingly prefer spending on experiences**, with **52% of Barclaycard users choosing experiences over material items**.*

The Proposed Development

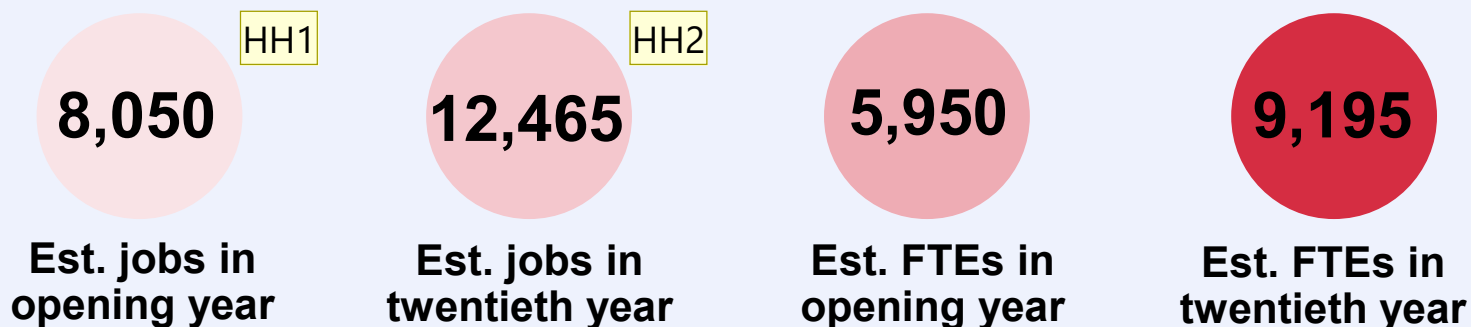
*The Proposed Development is very different to a typical amusement park and is **unlike anything that currently exists in the UK**. The Proposed Development will deliver a world-class theme park that would be **competitive on a global scale**.*

* AECOM, 2024. Theme Index 2023

Economic impact

Gross direct employment

Once operational, the ERC will deliver the following impacts:

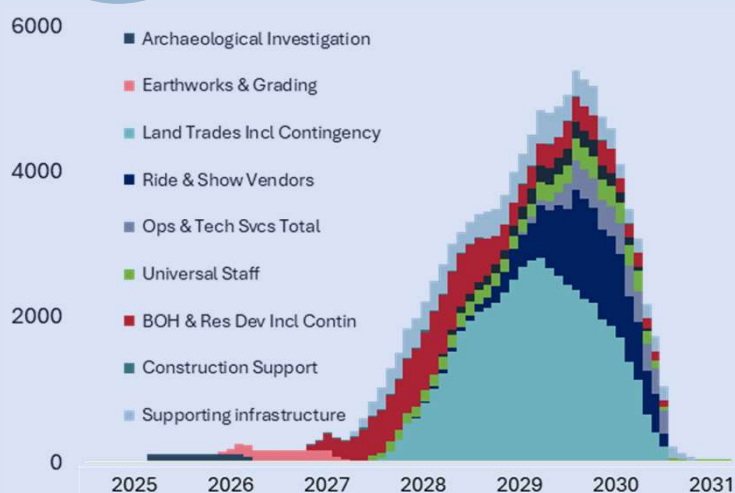


- **More than 68.7% of jobs projected to go to residents of Bedford and Central Bedfordshire in the opening year.**
- **Opening year employment represents 3% of national average employment growth from 2015 – 2022, rising to 4% in the twentieth year.**
- **Opening year employment represents 4% of Bedford and Central Bedfordshire existing employment as of 2022.**
- **UDX estimates that 13% of the proposed employee headcount (approximately 1,600 jobs) will be comprised of currently economically inactive residents.** UDX will achieve this goal through apprenticeships, internships, and earn-to-learn opportunities, and by collaborating with community partners, local educational institutions, and charitable organisations. A wide range of career paths will be made available to facilitate individual advancement.
- **A large number of jobs will be offered in the knowledge economy, including a diverse range of professionals such as accountants, IT professionals, legal professionals, engineers, medical professionals, and marketing specialists.**

Construction phase



At the peak of the construction phase, there would be more than 5,000 workers employed across a wide range of roles.



Employment and skills

5%

Of the construction workforce in **earn and learn positions.**

70

Apprenticeships annually from the fifth full year of operation.

35

Internships annually from the fifth full year of operation.

Slide 4

HH1 To be edited to 8,050 to align with TA
Himes, Heather (UDX), 2025-06-03T19:11:30.226

AS1 0 Edited
Adam Sands, 2025-06-03T21:26:17.528

HH2 Should this be 10,000 to align with the TA? Why is this so much higher?
Himes, Heather (UDX), 2025-06-03T19:12:11.166

AS2 0 This also includes staff members outside the Theme Park.

10,000 jobs is for the Theme Park in 2051.

This number of jobs includes those at other uses of the park, at the hotels and convention centre.
Adam Sands, 2025-06-03T21:28:57.971

Economic impact

Net additional impacts

Net present value (NPV)

£35bn

NPV GVA generated over a 30-year period (inclusive of a 5-year construction period and 25-year operational period).

£14bn

NPV tax generated over a 30-year period (inclusive of a 5-year construction period and 25-year operational period).

Net additional employment *



25,195

Net additional jobs across the UK in the first year of operation



42,485

Net additional jobs across the UK by the twentieth year of operation

* Estimated using the HCA Additionality Guide approach of applying displacement and multiplier effects to get net additional employment impacts. Displacement rates are set at low expected displacement per Additionality Guide standards. Displacement represents jobs that might otherwise be supported elsewhere. Larger areas typically experience more displacement, but the lack of similar offerings across the UK means that the Proposed Development will attract new market growth, rather than shift existing activity.

As consumer interest in experiences grows and theme park attendance rebounds post-pandemic, this development can meet new demand without impacting current UK attractions. **It is estimated that the proposed development will have a 3.1 economy-wide multiplier at the national level for the opening year, rising to 3.4 by 2051.** This is conservatively below the multiplier used in the economic study for the only other world-class theme park in Europe. Another European world-class theme park multiplier of 4 was used as a benchmark, where one job there generates three jobs elsewhere, suggesting a similar large-scale UK destination could see comparable impacts. A standard composite multiplier captures indirect and worker-induced impacts from new economic activity. This economy wide multiplier further includes consideration of induced visitor expenditure.

Economic impact

Visitor expenditure

8.5m

Annual visitors expected in opening year

This is approximately **3.2 times higher** than the UK theme park with the highest annual attendance in 2023.

12m

Annual visitors expected by twentieth year

This would place the Proposed Development within the top 10 most visited theme parks globally and the most visited in Europe based on current annual attendance.

Estimated additional expenditure

The guests at the theme park are expected to generate £1.3bn in additional expenditure across the UK in opening year, rising to £2.3bn by twentieth year.

	CSA	SRCA	LCA	National
Opening year	£255m	£430m	£560m	£1.3bn
Twentieth year	£350m	£635m	£865m	£2.3bn

APPENDIX 7: COPY OF UDX REPRESENTATION TO EWR NON-STATUTORY CONSULTATION



24th January 2025

East West Rail
By Email: consultation@eastwestrail.co.uk

Dear Sirs,

**EAST WEST RAIL NON-STATUTORY CONSULTATION NOVEMBER 2024
RESPONSE BY UNIVERSAL DESTINATIONS & EXPERIENCES (ON BEHALF OF KEMPSTON
HARDWICK DEVELOPMENTS LIMITED AND SC COLLECTION LIMITED)**

Introduction

This letter provides Universal Destinations & Experiences' (UDX's) response to the East West Rail (EWR) Non-Statutory Consultation, published in November 2024. This letter should be read in conjunction with the enclosed:

- Duly completed Feedback Form
- Transport Technical Note from Vectos (SLR)

In summary, whilst UDX supports the principle of enhancing the public transport links in the area, there are a number of significant flaws with the Non-Statutory Consultation materials which must be addressed. These fall into two principal categories:

- The consultation fails to take account of UDX's proposals for a major theme park and resort, and in fact contains proposals which would directly prejudice their delivery. This means that the proposals published as part of EWR's consultation are flawed and premature and will need to be substantially revised.
- Errors, inconsistencies and inaccuracies in the material published which do not relate specifically to the lack of recognition of the UDX proposals, but which should be addressed in any event.

As a result, UDX strongly objects to EWR's current Non-Statutory Consultation proposals.

Representations

In 2023 UDX acquired approximately 476 acres of land to the south-east of Bedford with the intention of developing a world-class Universal theme park and resort.

UDX is a leader in operating 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 and Sky in the UK.

The Universal theme park and resort project has the potential to be transformative for Bedford and to deliver significant benefits for the UK economy. UDX's developments create thousands of jobs, help to drive footfall to existing local businesses, and unlock major investment into other local enterprises and infrastructure. For example, the Bedford project is forecast to make a net contribution to the UK economy of £49 billion¹ over the construction period and first 25 years of operation.

As part of its feasibility and due diligence work, UDX spent the last two years discussing the project with local and national stakeholders (including positive and regular engagement with EWR). UDX also held a period of non-statutory public engagement from Friday 5 April to Friday 3 May 2024 to share its proposals with local communities and stakeholders.

The response to that engagement was overwhelmingly positive with 92% of people who responded supporting the creation of a Universal theme park and resort on the site. The project has also secured strong regional support from the chief executives and political leaders of Bedford Borough, Central Bedfordshire, Luton Borough, Milton Keynes City, North Northamptonshire, and West Northamptonshire councils.

Since acquisition of the site, UDX has actively engaged with EWR in respect of its proposals and EWR has been aware of the plans for the UDX project for a considerable time. It is therefore surprising and disappointing that, whilst EWR acknowledged in the Non-Statutory Consultation documentation that it is discussing its proposals with UDX and Bedford Borough Council and considering the implications of the theme park and resort for its proposals (including on its design), the current EWR proposals fail to pay regard to UDX's proposals. In fact, they significantly conflict with them and would compromise and prejudice their delivery.

The main areas of conflict in both EWR Options 1 and 2 is that they would both take UDX land to be used for the delivery and operation of its theme park and resort, including land within its Core Zone, West Gateway Zone and Lake Zone for:

- (a) The core theme park area.
- (b) Critical infrastructure including key access roadways and other transportation/pedestrian connections and hubs.
- (c) Theme park support uses.
- (d) Mixed use development areas.
- (e) Landscape and ecological mitigation areas.

The conflicts arising from Option 2 are enhanced by the significant amount of land, and its location, which has been suggested for the proposed Stewartby Station in Option 2.

¹ Comprises £35.1 billion net additional GVA (NPV) to the UK economy and £14.02 billion net additional tax revenues (NPV) over the build phase and first twenty-five years of operation.

Whilst a proper consideration of UDX's proposals should have been undertaken by EWR before publication of its Non-Statutory Consultation, UDX welcomes the confirmations now given by EWR in the consultation documentation that its proposals will be addressed. In addition, EWR will consider how Universal's proposals may impact its designs and the implications of the theme park and resort for the railway.

As EWR is aware, UDX's proposals do not require the delivery of any of the EWR proposals. The UDX and the EWR proposals are separate and do not form part of the same project. At this stage the EWR proposals are inchoate and are likely to be amended and refined (including but not limited to changes as a result of the UDX scheme, which EWR has confirmed it is considering).

Despite this, as EWR is aware, UDX is in principle prepared to consider "safeguarding" land within its site for a reasonable period to allow EWR to deliver a new station for Stewartby to come forward in a manner which does not conflict with UDX's plans. Despite having been aware of this "safeguarding" proposal, EWR has nowhere in its Non-Statutory Consultation mentioned this as a potential option.

Given the significant conflicts between the Non-Statutory Consultation proposals and UDX's proposals, EWR should now revise its proposals to reduce its land take, relocate elements (for example the Option 2 station location) and move works to land outside the UDX scheme.

As a result of the fundamental concerns raised in these representations, EWR's current Non-Statutory Consultation is premature and defective. In the circumstances, to ensure that a proper Non-Statutory Consultation is carried out, EWR should not proceed to the statutory consultation stage until it has fully addressed the implications of the UDX scheme and then re-consulted on a non-statutory basis.

UDX's Benefits

As noted above, the UDX proposals would have very significant benefits which include:

- (a) A forecast net contribution to the UK economy of £35.1 billion over the construction period and first 25 years of operation.
- (b) An estimated net additional tax revenue for HM Treasury of up to £14.02 billion for the same period.
- (c) The creation of an expected 8,000 new jobs at the theme park once operational, rising to 10,000 by year 20 of operation.
- (d) Thousands of jobs generated through construction, with an estimated onsite peak workforce of approximately 5,000.
- (e) Increased local employment opportunities. Initial estimates suggest that over 75% of the workforce would come from Bedford, Central Bedfordshire, Luton and Milton Keynes.
- (f) Dedicated training programmes. A range of jobs at different experience levels would be created, each with genuine growth opportunities.
- (g) The facilitation of significant infrastructure improvements, including major road and rail upgrades.

- (h) A major boost to local and UK tourism, with the expectation that for every job created at the park, at least 1.5 further jobs would be created throughout the UK economy.
- (i) Partnerships with local education institutions and businesses.

The UDX project is clearly of significant importance to Bedford, the region and the UK and its delivery should not be prejudiced by EWR.

Errors, Inconsistencies and Inaccuracies

The Transport Technical Note submitted with this representation sets out concerns with regard to the meaningfulness and accuracy of the consultation material and assessment that has informed it. Concerns set out in the Note include:

- Overall lack of analysis of alternative options and reasons for dismissing them and/or justification for the preferred approach or options put forward.
- Lack of consistency with the safeguarding direction.
- Lack of clarity on the need for passing loops and their proposed locations.
- Inconsistency with Network Rail proposals for Manor Road bridge.
- Reliance on a transport model which EWR recognise is not suitable and needs to be updated.
- Lack of quantitative assessment.
- The extent of the transport model has not been documented, and those already suffering from congestion are not reported as suffering additional impact, and so it is unclear what the actual effects on local roads are.
- Door-to-door connectivity at each station has not been suitably addressed.
- There is a complete lack of strategic vision as to how EWR relates to, and can help facilitate, wider growth of the area.

These issues put into doubt confidence in the consultation material, and further lead to the conclusion that the consultation is premature.

Conclusions and Next Steps

This letter and the Transport Technical Note have set out our substantive concerns on EWR's Non-Statutory Consultation.

Whilst we recognise that this is an early stage of consultation, because of the failure to take into account UDX's development, absence of technical detail or evidence to substantiate the information provided, and lack of explanation of alternative options considered, it is impossible to provide complete comments at this stage.

EWR should not proceed to the statutory consultation stage until it has fully addressed the matters set out in these representations and then re-consulted on a non-statutory basis.

UDX remains committed to working with EWR to ensure that the two projects maximise the benefits to each other. We remain open to regular engagement and information sharing to achieve this aim.

Yours faithfully,



Adam Williams
Senior Vice President, Legal and Business Affairs
Universal Destinations & Experiences

UNIVERSAL DESTINATIONS & EXPERIENCES

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Transport Technical Note – UDX Response to East West Rail Non-Statutory Consultation, November 2024

226817A/N07

24 January 2025

Approach & Summary

1. We are instructed by Universal Destinations & Experiences ('UDX') in relation to their proposals for a world-class theme park and resort to the south-west of Bedford. This note provides a technical response on transport issues arising from the East West Rail ('EWR') Non-Statutory Consultation documents published in November 2024.
2. In summary, whilst UDX support the principle of enhancing the public transport links in the area, there are a number of significant technical flaws with the submission material which must be addressed. These fall into two principal categories:
 - The consultation fails to take account of UDX's proposals.
 - Errors, inconsistencies and inaccuracies in the material published which do not relate specifically to the lack of recognition of the UDX proposals.
3. This note is largely concerned with the second category and provides a review of the Transport Update Report (and associated appendices) and Technical Report (and associated appendices) published as part of the consultation.
4. It appears that EWR Co have only undertaken a high-level qualitative assessment, and that many of the conclusions are based largely on judgements. These judgements have not been substantiated within the available public documents. Therefore, there is no ability for those only in the public domain to satisfy themselves on the validity and appropriateness of the work undertaken, and the resulting judgements and designs. Given the scale and impacts of the scheme, we expect that this material will be available for the next stage of consultation, however we also consider that the lack of evidence and technical material supporting the consultation calls into question its meaningfulness.
5. We have an underlying concern, that insufficient emphasis is placed on how this fantastic opportunity for a new mass transit provision might be designed to attract maximum passengers, and to contribute in the best way to UK growth.
6. The reasons for the proposed EWR layout, design and strategy are unsupported by evidence. The Technical Report does not include a consideration of alternatives, or an explanation of why the chosen design has been selected. This is particularly important in relation to the UDX proposals, as EWR has chosen to consult on an option for a station, track alignment and vehicular access in the vicinity of the UDX site that directly prejudices the delivery of the theme park and resort. This is despite the information on UDX's proposals being in the public domain since April 2024. UDX would

like to understand what other station sites were considered and why, for instance, land to the west of the railway outside of the land proposed by UDX for its theme park was not considered.

7. The following comments summarise our more specific thoughts in respect of each document. In the interest of brevity, we have not addressed every point, and so these responses are not comprehensive.

Transport Update Report

8. The Transport Update Report (TUR) is qualitative only and therefore of limited value. It does not provide a suitable evidential basis or reasoning. There is a lack of evidence to support the claims and judgements made throughout the report.
9. The TUR does not provide details of anticipated movement demands at the stations in any of the assessed options. This renders it challenging to consider the benefits of the options.
10. As part of any assessment, one would anticipate that a demand analysis for each station and options linked to anticipated growth (Local Plans, etc.) would be a key foundation of the analysis. This is not present.
11. The TUR does not take a suitably strategic approach. The vision for the UK is to create an Integrated Transport System which should be safe, reliable and accessible for everyone. The proposed Integrated Transport System strategy set out in November 2024 by the Transport Secretary was to drive a cultural change where people are put at the heart of how we design, build and operate transport. EWR has the opportunity to be central to this vision within the Milton Keynes / Bedford area, but the current approach to the consultation fails to do this. It seems to be designed as a railway set rather than part of an integrated network based on people and places and an opportunity to create and drive economic value.
12. For example, Stewartby station is positioned, in either option, to serve the existing settlement as well as a significant growth area, however, the publicly available information does not demonstrate how the proposals would benefit the area and the future aspirations and then how this would be connected by walking, cycling and other public transport.
13. Furthermore, a key feature of the DfT 'Decarbonising Transport' vision is to embed transport decarbonisation principles in spatial planning and across transport policymaking. A feature of this would be to create integrated and joined up transport and land use decisions which encourage the use of sustainable modes of transport as a priority. While it is stated within the report there would be improved connectivity and accessibility this does not seem to have been drawn out in any detail. As such we are unable to comment on the prospect of this.
14. The TUR states that the analysis undertaken as part of the initial consultation (including qualitative review and limited strategic traffic modelling) is used to inform early thinking on mitigation measures, but no location-specific mitigation is identified. Overall, it appears that this is a high-level and unquantified report with a limited evidence basis.
15. Within each of the route sections there appears to be no actual details given of potential impacts or mitigation. One would have expected this report to build on the generic impacts tables included at

Section 1.4 Assessment Findings. However, there was no further information or detail available. As such it is not possible to conclude that the assessment findings were any more than unqualified judgements by EWR Co, based on limited or no information.

16. The road traffic collision analysis for each route section simply presents the number and severity rating of collisions. No information is provided on locations (i.e. have these occurred in the vicinity of level crossings, are there any clusters which raise concern, have any occurred around existing stations, etc.) and whether there are any patterns which could be of concern. Therefore, the analysis is extremely limited in its usefulness.
17. Figures are included in each route analysis section showing links where the Volume over Capacity (VoC) is at or over 85% (the report states that this shows links over theoretical capacity). No actual traffic flows are provided or other data to verify this information. This is a very simplistic approach, and of little value, as one cannot use it to establish the effects of the proposal.
18. The effect of increased volume on a road link is reduced traffic speeds on a link, but the more important issues are the practical consequences to people. This has not been commented on within the document. How the proposals would affect populations is not detailed within the report. A more detailed comment on the approach to traffic modelling is set out later in this Note.

Fenny Stratford to Kempston

19. The section on Fenny Stratford to Kempston sets out the various concepts.
20. Concept 1a for the Fenny Stratford to Kempston section includes all existing stations remaining open. It is understood that EWR services would not stop at Kempston Hardwick, but it is acknowledged in the report that usage of this station is extremely low. Combined with the substandard facilities, such as a lack of parking, onward pedestrian / public transport routes and short platforms, it would seem inefficient to consider an option which retains substandard facilities. This would coincide with longer journey times along the route and other issues as such it is likely that the concept of retaining all existing stations does not match with the desire to create a viable and effective EWR service that becomes a driver for economic growth in the region.
21. Table 17 of Section 9 alludes to summarising the potential transport impacts of Concept 2. However, it does not set out that improved connectivity to stations by active modes of travel and buses would be needed for all the station options. For instance, the current accessibility at either Stewartby, Kempston Hardwick or the future option for Stewartby are all isolated with limited/poor accessibility. These should as a minimum include mobility hubs, local facilities for users etc and include feasibility studies to determine potential demand. We acknowledge there is a 'wishlist' for stations in the Technical Report (Section 3.8.3), but this is not specific for stations within Stewartby/Kempston study area and do not set out the proposals for the local areas. Again, this suggests that the EWR Co approach is to build a railway rather than encouraging users through a comprehensive vision led approach to planning.
22. Table 17 of Section 9 includes a summary of potential impacts to highway users, NMUs and rail users on the Fenny Stratford to Kempston section. It states that there will be closure of some level crossings, and at remaining crossings there will be additional barrier downtime. The potential impact

of this change is stated as “All users will be required to utilise alternative routes which will lead to an increase in journey distance and time. The suitability of the routes for all users will be assessed once the design is confirmed to ensure the proposed diversion routes are suitable, with mitigation proposed where required to enhance routes. At this stage, closure and subsequent route diversions are expected at some level crossings.”

23. This appears to imply that all level crossings will be closed, and alternative routes will be provided, which is not our understanding from discussions with both EWR Co and Network Rail. For example, there is an approved scheme proposed for the Manor Road level crossing which involves the construction of a new bridge over the MVL.

Mitigation Section

24. The mitigation strategy (Section 16) is very high level and does not provide any clear proposals. The TUR is a high-level report and so this section is of limited value.

Appendix A of the Transport Update Report

25. A review of the TA Scoping report has been undertaken. The report is limited in terms of information and approach.
26. The statement at paragraph A1.3.3 is concerning. Within any scoping document one should identify the geographical scope, and this is not included and as such we cannot comment. In relation to the study area where UDX are concerned, our view is that the study should include a full and detailed multi modal assessment of the entirety of Bedford and its surrounding areas including Wixams, Stewartby, Kempston, Wootton and Marston Moretaine. This should assess the potential for modal shift, reductions in traffic and changes in how, when and where people travel.
27. The approach to assessment relies on local junction modelling to address issues. This is not supported for the Bedford / Kempston / Stewartby area where UDX have built a specific and detailed model. It is recommended that EWR Co should use this model for that area, and access to this model has been granted to the Department for Transport (DfT).
28. Specifically in relation to construction, the report states that the TUR will “report on the emerging potential routes and compound locations and the likely level of construction traffic expected to use these in terms of high, medium or low based on total daily movements.” As far as we can tell, this has not been undertaken within the TUR.
29. Generally, there is a comment that the construction assessment will only consider the weekday AM and PM peak hours. This is not reasonable or acceptable in the context of planning policy as construction activity occurs across a day and as a minimum it should be assessed across every hour of the construction time to identify the time where there is the potential for greatest change.
30. This is also the case for the operational assessment where the assessment should be undertaken across a day and across many hours rather than being a predict and provide approach and then only considers across traditional commuter peak hours. This is the antithesis of the modern policy Vision Led approach to planning.

Transport Modelling

31. This section provides a review of the proposed modelling approach. It should be noted that some points are also addressed elsewhere within this Note and are therefore not repeated.
32. The modelling approach is wholly reliant upon the East West Rail Strategic Highway Model (EWRSHM), but no assurance is provided within the TUR that the EWRSHM is fit for purpose and indeed it is acknowledged later in the TUR that it is not, needs to be updated and therefore only qualitative judgements can be made at this stage (see below).
33. There is a significant amount of reliance upon volume/capacity ratios as a means of determining effect but without the necessary assurances that the existing network (and by association the existing V/C figures) is accurately modelled (see comments below, where EWR accept the shortcomings of the existing model and recognise that it needs to be updated). Thus, one cannot have any confidence that the outputs can be relied upon or determine the level of accuracy that one can apply to those results.
34. The report refers (1.3.2) to TAG guidance regarding the need to consider the effects of COVID and uncertainty on traffic modelling. However, it then goes on to state that the modelling has been undertaken representative of 2019 Base year conditions. This is contrary to TAG guidance (particularly Unit M4, Appendix B) which discusses proportionate approaches to adjusting traffic models to account for the effects of Covid and uncertainty on traffic trends.
35. The Technical Report sets out (1.3.3 to 1.3.6) that no mitigation has been considered and suggests that, because of changes in traffic flows (Baseline), modelling assumptions and project design it is possible that the impacts in the TUR will differ from those presented at a later stage. Whilst it is expected that some conclusions will change as modelling is refined, this seems exceptionally open ended as it implies no confidence should be afforded to the current modelling outputs until updates are applied (such as those which would be expected to ensure uncertainties such as the effect of COVID on traffic flows are accounted for through the modelling).
36. The report does not state the benefits which are anticipated to be derived from the use of a bespoke transport model for the TA stage and so, as a result, also omits what it considers to be the limitations of the use of EWRSH for the initial stages of assessment. It also states (6.1.3) that a quantitative assessment could not be undertaken and that only a qualitative assessment is possible, partly because of the need to update the transport model. Thus, there seems to be little point in undertaking any analysis within the EWRSHM since it is not considered sufficiently reliable by EWR Co itself to inform quantitative analysis and is intended to be updated in any event.
37. We agree that the EWRSHM is unlikely to be fit for purpose for any detailed traffic impact assessment related to the EWR proposals and so also question why the report later sets out analysis of areas where VoC is a concern (despite not demonstrating if those areas, or indeed the fully modelled area, has been sufficiently calibrated to afford any reliance on these outputs even as an initial high level estimate of effect).

38. VoC is also uninformative as it is unrealistic to envisage a scenario where road capacity is truly exceeded as traffic reassignment and other behavioural changes will enact to minimise the inconvenience which arises from the lack of capacity. This measure alone as an indicator of effect is therefore too simplistic to be considered reliable.
39. However, the nature of the modelling also introduces further limitations to the assessment. Whilst any strategic model EWR Co may develop can be considered appropriate for the purpose of assessing the broad impacts of the proposals, it is not the most appropriate tool for undertaking detailed development impact assessments.
40. It is inevitably the case that the strategic model will not be calibrated to a sufficiently high degree to enable traffic flows to be extracted from the strategic model and input to junction modelling with confidence. There will be significant limitations related to lack of calibration within the strategic model that mean it will be essential to collect new traffic data to ensure any gaps in the data are mitigated and the assessment based on realistic traffic flow estimates.
41. The interoperability of junctions within the immediate area of critical development proposals (such as new stations and the associated access) and how it affects route choice within the area will be critical considerations within the assessment but are, at a granular level, not possible within a strategic model.
42. The implication is that the strategic modelling will be supplemented by other modelling, but no commitment is made on the type of modelling which will be used to supplement these assessments. The influence that each junction has on those which lie up or downstream from the junction being assessed is entirely omitted from isolated junction modelling (IJM) assessment as is the ability to consider feedback loops arising from the reassignment of trips which respond to congestion and other adverse conditions. This 'traditional' approach to traffic modelling is neither sufficient nor appropriate to consider proposals of the scale of EWR.
43. Any queueing which occurs and blocks back between junctions cannot be considered in an assessment approach which relies on IJM, even if the flows themselves have been derived from the strategic transport model. Similarly, the effects of the concentrated traffic movements around new infrastructure (such as stations) can only be considered in microsimulation.
44. Within the assessment of potential impacts (such as those presented within section 9.4) significant weight is placed on the use of VoCs as a means of measuring impact. It refers to local roads as being affected but there is no evidence as to how accurate these (or any) roads are calibrated within the model. Furthermore, there are likely to be a significant number of other 'local' roads which are entirely omitted due to the strategic nature of the model.
45. Furthermore, the report acknowledges (9.4.5) that, whilst some roads are pushed over capacity by the proposals and have been identified as such, roads which are already over capacity are entirely omitted from the assessment. Having regard to the lack of reliability of this measure in the first place, it is surprising to see that areas where impacts may occur are then also excluded if impacts are already in place on the network. These impacts are only due to be considered within the final TA which is a significant further limitation in the evidence presented to date.

46. This pattern of analysis is repeated throughout the report meaning that there are substantial questions which exist concerning the validity and reliability of this assessment on the following basis:
 - The suitability of the model has not been demonstrated and is recognised by EWR itself as lacking;
 - The extent of the model network has not been documented meaning the omission of any local roads from the model is not clear. This means one cannot be certain a road is not affected because it is not predicted to be affected through the modelling or is simply not in the model; and
 - Any roads already suffering from congestion are not reported as suffering additional impact (meaning any impacts may well be masked consequently).
47. All of this analysis is then anticipated to be replaced by an updated model in any event and so it is clear that EWR Co does not consider any weight should be placed on this analysis or these impacts at this time.
48. Notwithstanding the significant concerns about the appropriateness of the method of assessment, particularly concerning the lack of detail and coarse nature of strategic modelling, it appears that even in EWR Co's view the work it has presented is incomplete with significant omissions.
49. Addressing these omissions would not mean the methodology could be considered appropriate but it would mean that the assessment could be considered transparent and all 'effects' as identified through the methodology would have been identified, which is not the case with the work presented thus far.
50. Finally, when the report moves on to the need for mitigation, it is again reliant upon VoCs as the means by which impacts will be judged. The model is unlikely to represent the network in sufficient detail for this to be the only indicator unless it can be demonstrated that a significant level of calibration and validation is achieved around all areas of the network which will be affected by the proposals. The nature of the model makes this impossible and supplementing it with only IJM is inappropriate for the reasons stated previously.
51. VoCs are an inappropriate metric, on their own, for judging the importance of an effect and making judgements about the need or value of mitigation.
52. The report establishes a bar of a 30% increase in traffic as the lower limit for considering effect. This is an entirely self-defined, unsubstantiated, and inappropriate means for determining areas and effects of importance. The determination of where there are effects, and their importance, is far more sophisticated. This is a simplistic approach. There is a high risk that in adopting this approach the effects of importance are not captured by the process.
53. For instance, this means that all the Strategic Road Network (SRN) will likely be omitted, and the baseline flows once subject to forecasting will likely be inflated by optimistic growth projections to a point where these impacts are masked.

54. The report does not state how mitigation will be designed or assessed by the time the TA is produced.

Technical Report

55. Alongside the Transport Report there is a Technical Report. This has been reviewed and gives some detail but again based on the review of publicly available information does not present suitable data and an evidential basis for decisions.
56. Table 1 in Section 3.8 (Technical Considerations) shows service patterns for Concept 1a (all MVL existing stations open) and Concept 2 (MVL consolidated stations). There is one less service between Stewartby and Cambridge with Concept 2 but no explanation as to why this is. With fewer stations there could be more services. This is not evidenced in the report.
57. Data on current All Level Crossing Risk Model (ALCRM) scores and level of misuse of existing crossings (which is used to inform risk assessments for each crossing) is referred to but not provided in the Technical Report. This makes it challenging to give a view on the acceptability of the analysis.
58. Section 7 (Fenny Stratford to Kempston) notes that the relocation of Stewartby Station approximately 1km to the north does not consider the potential development by UDX, despite this proposal requiring land owned by UDX. Furthermore, even if UDX proposals do not progress there will likely be other development in the area, as the area was identified in the Draft Local Plan as a site for strategic development. This should be a key consideration and the interaction of land use and transport planning to create a vision for the area should be considered by EWR Co. Moreover, this would require a CPO to use the land and EWR Co would have to identify why there is not a reasonable alternative, which it has not done.
59. Section 7.2 Level Crossings on MVL: assumes Broadmead Road crossing is retained as a CCTV crossing and assumes Manor Road is upgraded by Network Rail to a bridge, if not upgraded by Network Rail, then EWR Co proposes upgrading to a full barrier crossing. No data is provided regarding the ALCRM scores and other data supporting these proposals.
60. Stewartby relocation Option 2 requires UDX land but there is no mention of this. It is simply stated that UDX are considered developing a theme park and resort next to the potential EWR station, not that the station is located on UDX's development site. The station is shown as east facing, with an access from Broadmead Road to the east of the MVL. This would serve existing and future residential development in Stewartby but does not account for the aspiration for a strategic site on the land between Woburn Road and the MVL north of Broadmead Road.
61. Option 2, but with a station to the west of the MVL, would provide better connection to the SRN and areas such as Wootton and would not be in conflict with UDX's proposals for a theme park and resort to the east of the MVL. This is the thrust of the substantial discussions that UDX has had with EWR Co. This is neither reflected nor explained in the EWR Co documents, other than to say that the UDX proposals have not been accounted for. EWR Co. could have included the option for a west facing station, so this was not ruled out, or set a wider potential area for the station location, even if it did not

fully take account of the existence of the UDX proposals. As consulted on, the EWR proposals not only do not take account of the UDX proposals, but also actively prejudice them.

62. The Technical Report identifies that passing loop options are proposed to the north of Broadmead Road. This will also require UDX land. The need for passing loops is set out but the suitability of, and optioneering around, the proposed locations is not.
63. If Option 2 (consolidated stations) is progressed it appears that there would be greater space south of the station for passing places rather than within UDX land. From our review, we have not been able to see that has been considered as an option and/or the reasons why it was dismissed. We question whether any widening of the track limits needs to be on the east side of the tracks, and if so the evidence for that. We would expect the technical reports to set out the justification for these options and set out the options that have been considered and dismissed.
64. The report sets out that the proposals include a three-platform station at Stewartby in Stewartby Station Option 2. We understand that one platform is for a 'Turn Back' to and from Cambridge. There is no explanation or evidentially based justification for this, or this location. There is no explanation as to what this means for additional railway tracks along the boundary with the UDX land, and no explanation as to what this means for safeguarding, and why the safeguarding line has been drawn as it is. In particular there are nonlinear elements of the safeguarding line, which are not explained, and for which, based on the report, we can see no reason.
65. In addition, it appears to be at odds with the Network Rail proposals for the bridge crossing at Manor Road, approved as part of the Transport and Works Act Order. Does this mean that the Network Rail bridge design cannot be delivered? There is no clarity on this, or mention of this, within the report.
66. It is unclear whether in the option where the existing Kempston Hardwick Station is retained how a suitable station is redesigned given accessibility requirements.
67. For Broadmead Road level crossing, the publicly available information suggests that the crossing can accommodate predicted traffic flows. However, the reports do not explain how EWR Co has come to this conclusion. It does not set out what development is occurring within the area, the usage of car parks, how vehicles and people will change their routing and what the demands created by the new train services are. As such this seems to be a judgement by EWR Co rather than a substantiated and evidenced conclusion.
68. Manor Road level crossing has the same conclusions as Broadmead Road. It is shown to have a very low risk factor even with the current configuration. With upgrade to a full barrier this would be even lower. There is no evidence provided to support or substantiate this.
69. On both level crossings, one would envisage that a safe and integrated transport network would include grade separated crossings to be considered. It is not clear within the publicly available documents whether this has been considered and why the stated conclusions have been reached.
70. Door to door connectivity is a significant issue, and which has not been suitably addressed. The approach to door-to-door connectivity is set out in the design section of the Technical Report but this is very light on detail. It is difficult and potentially impossible for EWR Co to have come to the stated conclusions without understanding the proposals for door-to-door connectivity at each station.

71. At Ridgmont Station there is a mention of a Park & Ride station, but this is not referred to in the Consultation Document itself. There is no explanation of any discussion in this respect with National Highways. We would expect this to be an issue for the M1 Junction 13, and for these reports to both acknowledge that, explain what the effects are, and explain why these are appropriate and acceptable in the round.
72. There is no evidence of any consequential modelling in this respect.

Conclusion

73. This note has set out our substantive concerns from a technical aspect on EWR Co's non-statutory consultation. Whilst we recognise that this is an early stage of consultation, because of the absence of technical detail or evidence to substantiate the information provided, together with a lack of explanation of alternative options considered, it is considered impossible to provide complete comments at this stage.
74. UDX remain committed to working with EWR Co to ensure that the two projects do not prejudice, and where possible maximise the benefits, to each other.

APPENDIX 8 – EMPLOYMENT AND SKILLS INFOGRAPHIC

Universal Destinations & Experiences UK Project

Appendix 8 - Employment and Skills Contributions

June 2025

Employment and skills contributions

If this scheme progresses, UDX would deliver an Employment and Skills framework. The below commitments would be delivered as part of this framework.

Employment:



UDX will pay all employees at least the National Living Wage throughout construction and operation.

Skills initiatives:



Local issues tackled:

Bedford and Central Bedfordshire have a lower proportion of the workforce receiving in-work training relative to comparators.
The apprenticeship start rate in Bedford has consistently been below the national average.

Student initiatives:



Local issues tackled:

A higher proportion of KS2 students in the area perform below expectations.
There is a large gap in attainment between students that are eligible for free school meals and those that are not in Central Bedfordshire.

Employment and skills contributions longlist

This document provides headline figures. For full details of these contributions, please see **Employment & Skills Plan (document reference 6.12.0)**.

Initiative	Description
Construction skills	<p>During the Primary Phase of construction, UDX will make sure that Principal Contractors actively engage with local students within Bedford and Central Bedfordshire and give priority access to qualified local students in the hiring process. Measures that the Principal Contractor(s) will be required to commit to include:</p> <ul style="list-style-type: none"> • Partnering with local schools, colleges, and/or universities to create awareness about career opportunities in construction; • Organise or participate in local careers fairs and workshops at these institutions; • Advertise job openings through local media, educational institutions, and community centres to make sure local students are aware of the opportunities; and • Arrange site visits for interested local students to provide them with a real-world understanding of construction processes and careers. <p>UDX will make sure that these occur by explicitly including these requirements within the contracting process.</p>
Job creation	<p>During the Primary Phase of construction, Universal will make sure that local skilled workers within Bedford and Central Bedfordshire receive access to employment opportunities. Principal Contractors will be required to actively promote these opportunities, emphasising the importance of hiring qualified people locally within Bedford and Central Bedfordshire. Mechanisms to make sure of this will include:</p> <ol style="list-style-type: none"> 1. Advertising job openings through local media and community centres to make sure local skilled workers are made aware of job opportunities; 2. Providing job requirements and advertisements to the local authorities for them to disseminate through any of their local priority channels, or publicising directly to these groups as advised by the local authorities; and 3. Collaborating with local job centres and employment agencies to identify and recruit skilled workers from the area
Educational and Community Partnerships	<p>Throughout the Primary Phase of construction and the ongoing operations, UDX will commit to forming partnerships with local educational institutions and community groups, such as University of Bedfordshire, Cranfield University and Bedford College.</p>
Education Engagement	<p>UDX will partner with schools, colleges, and universities to promote awareness of creative industry and visitor economy careers and assign a dedicated representative to deliver on these commitments.</p>
Leadership representation	<p>UDX will run executive mentorship programmes for 15 participants annually. This will run for at least 5 years after grand opening.</p>
Accessibility and Disability Inclusion	<p>UDX will make sure accessible job adverts, inclusive job descriptions, and interview accommodations are provided.</p>
Employee DEI Programming	<p>UDX will establish Employee Resource Groups and provide programming to foster an inclusive workforce and guest experience.</p>
Equal Opportunities Compliance	<p>UDX will act as an equal opportunities employer, adhere to the Equality Act 2010, and provide regular Respect in the Workplace training.</p>

APPENDIX 9 – CASE STUDY: THE ECONOMIC IMPACT OF THE UNIVERSAL ENTERTAINMENT RESORT COMPLEXES IN METRO ORLANDO

Case Study: The Economic Impact of the Entertainment Resort Complexes in Metro Orlando

Prepared by: Sean Snaith, Ph.D.
June 2025

Case Study: The Economic Impact of the Entertainment Resort Complexes in Metro Orlando

Spatial Context

- In 1971, the Orlando region was a small metropolitan area with an economy that was driven by agriculture, primarily the citrus industry.
- The opening of Disney World that year followed in 1990 by Universal Orlando Resort began the transformation of the region's economy from a sleepy agricultural town into a global tourism destination and one of Florida's largest and fastest growing regions.
- The opening of Walt Disney World's Magic Kingdom in 1971 and Universal Orlando Resort in 1990 were pivotal moments. These decisions to locate in Orlando were influenced by location theory. In particular, the proximity to major transportation routes (Interstate 4) made it ideal for large-scale theme parks.

Case Study: The Economic Impact of the Entertainment Resort Complexes in Metro Orlando

Tourism-Driven Infrastructure Expansion

- Disney and Universal's presence spurred modern infrastructure like hotels, roads, and the Orlando International Airport (MCO), which opened in 1962 but expanded significantly post-1971 to accommodate tourists and now handles 57 million passengers each year up from 12 million in 1990.
- Orlando's tourism-driven infrastructure including expansion of the Orlando International Airport, International Drive's transformation into an entertainment district, and with the opening of Epic Universe a similar future transformation of the Kirkman Road corridor that continue to enhance the region's accessibility and appeal, reinforcing location advantages.
- The Orange County Convention Center (OCCC), opened in 1983, positioned Orlando as a major business tourism destination, hosting trade shows and conventions. By the 1990s, it was the second-largest trade show destination in the U.S. fueled by the region's greater tourism industry.

Case Study: The Economic Impact of the Entertainment Resort Complexes in Metro Orlando

Agglomeration Economies

- Orlando's tourism industry exemplifies agglomeration economies, with theme parks, hotels, and business conventions creating a self-reinforcing economic ecosystem.
- Disney and Universal's success then attracted other businesses (hotels, restaurants), creating a clustering effect that lowered costs and increased economic activity in Orlando while benefitting existing businesses in the region.
- Tourism has also spurred growth in educational and training programs that boost the region's workforce development. This includes the Rosen College of Hospitality Management at the University of Central Florida –the #1 ranked school in the world for hospitality education.
- Orlando's Creative Village initiative specifically aims to attract high-tech and creative companies by co-locating them with educational institutions. The success of this initiative is tied to the city's established technology and innovation economy, significantly influenced by the theme park industry.

Case Study: The Economic Impact of the Entertainment Resort Complexes in Metro Orlando

Tourism-Driven Infrastructure Expansion

- The Entertainment Resort Complexes owned and operated by Disney and Universal are more than just theme parks, they deliver significant spin off benefits. Disney and Universal have created tens of thousands of direct jobs (park employees), but even more indirect jobs (construction, suppliers).
- The data presented in this table shows that while Leisure and Hospitality jobs increased by 265% in the 35-year period evaluated, other industries like Professional, Scientific, and Technical Services increased significantly more at 521% growth, with Education and Healthcare right behind at 434% growth.

Orlando Employment	Jobs 1990	Jobs 2025 (April)	Percent Change 1990 - 2025
Total Payroll Jobs	566,200	1,528,500	270%
Leisure & Hospitality	112,100	297,400	265%
Professional, Scientific, and Tech. Services	22,800	118,800	521%
Education & Healthcare	45,900	199,300	434%
Financial Activities	41,300	92,400	224%

Case Study: The Economic Impact of the Entertainment Resort Complexes in Metro Orlando

Economic Diversification

- Tourism's success fostered innovation in related industries, such as modeling and simulation (used in ride design and later applied to defense and healthcare) and virtual reality. Orlando's Central Florida Automated Vehicle Partnership, designated in the 2010s, leveraged theme park expertise for autonomous vehicle testing.
- The design and construction of Epic Universe in Orlando resulted in 161 patents issued and published applications solely developed for use in Epic Universe.
- Specific examples in the Orlando region of this type of spin off are advanced manufacturing (Oceaneering Entertainment Systems, Finfrock), creative industries (The Nassal Company, Falcon's Creative Group), and entertainment design firms (Martin Aquatic, PGAV, ITEC).

Case Study: The Economic Impact of the Entertainment Resort Complexes in Metro Orlando

Spatial Economic Impacts

- Traditional economic impact analysis (such as that provided by Volterra in the Environmental Assessment) captures the direct and indirect impacts that the Universal project in Bedford will provide the U.K. Jobs, tax revenues and economic activity that stem from the construction and operations of the Universal Entertainment Resort Complex will ripple across the U.K.'s economy.
- The case study of Entertainment Resort Complexes in Orlando provides more granular insight into the potential spatial economic impact on the region in and around Bedfordshire and how this project will shape the transformation of the region over time.

Case Study: The Economic Impact of the Entertainment Resort Complexes in Metro Orlando

Application of the Orlando Case Study to the proposed Entertainment Resort Complex in Bedford

- Orlando's economic evolution from a small agricultural driven economy in 1970 to a thriving, diversified metropolitan area and a premier global tourist destination today provide a vision for what the coming decades may hold for Bedford and surrounding areas, beginning with Universal's new Entertainment Resort Complex.
- The transformative impact that major Entertainment Resort Complexes have had in Orlando cannot be overstated—and not just in the tourism sector of the economy. These developments have driven innovation in the region, created tens of thousands of jobs, and led to thousands of new businesses across diverse sectors of the economy.
- Universal's planned project in Bedford represents the beginning of a similar journey for Bedford and will accelerate the growth of the Ox-Cam Arc.

Case Study: The Economic Impact of the Entertainment Resort Complexes in Metro Orlando

Application of the Orlando Case Study to the proposed Entertainment Resort Complex in Bedford

- The Orlando case study suggests that the influx of millions of tourists into Bedford and the Ox-Cam Arc areas will benefit the existing businesses in the region and spur the creation of hundreds of new businesses as well.
- The large number of visitors should catalyze agglomeration economies similar to the way it has expanded the economic diversification in Orlando.
- This new industry will lead to clustering of related businesses (hotels, restaurants, other visitor attractions) and creating economies of scale and reduced costs for suppliers and workers.

Case Study: The Economic Impact of the Entertainment Resort Complexes in Metro Orlando

Application of the Orlando Case Study to the proposed Entertainment Resort Complex in Bedford

- Spatial equilibrium dynamics will ensure labor and capital flows to the Bedford region as high wages and job opportunities in tourism attract needed resources.
- Bedford has a stronger existing transportation network (roads, rail and air) than Orlando did when it began its economic evolution and this will help accelerate this process in the region.
- The existing transportation infrastructure in the Bedford region will benefit further from the investment that the influx of visitors, workers and new businesses to the region will provide and will grow as the economy evolves.
- The knowledge economy will benefit as the workforce evolves to meet the demand for workers spurring new education programs and institutions to provide the skills needed to fill jobs in spin-off technology sectors, creative industries, the trades, and hospitality industries as the region's economy grows.

Case Study: The Economic Impact of the Entertainment Resort Complexes in Metro Orlando

Application of the Orlando Case Study to the proposed Entertainment Resort Complex in Bedford

- Innovation in the theme park industry will drive the creation of new industry clusters that will help to further diversification of the region's economy.
- The Ox Cam Arc (now called the Oxford to Cambridge pan-Regional Partnership) has, and aspires to have further, internationally significant projects within its region and contains several top tier research and development universities. A couple of examples of this are:
 - The Biomedical campus in Cambridge, one of the top seven global locations for biomedical and life science research.
 - The hub of Formula 1 motorsports and research is in the Silverstone/Banbury/Milton Keynes region where teams such as Aston Martin, Mercedes, Red Bull and Haas are based.
 - Cranfield University, located near the Bedford site, is already a university on the cutting-edge of research, development and innovation poised to embrace the opportunities to partner with Universal.
- The U.K. and the Bedford region have a unique opportunity to take the first step on a journey similar to Orlando, beginning with moving forward with the planned Universal Entertainment Resort Complex. A journey that offers the promise of transformational change in the region.

Case Study: The Economic Impact of the Entertainment Resort Complexes in Metro Orlando

SNAITH ECONOMICS – Sean Snaith, Ph.D.

- Sean Snaith, Ph.D., is the director of the University of Central Florida's Institute for Economic Forecasting and a nationally recognized economist in the field of business and economic forecasting.
- Snaith is the recipient of multiple awards for the accuracy of his forecasts, his research and his teaching. He has served as a consultant for local governments and multinational corporations such as Compaq, Dell and IBM. Before joining UCF's College of Business, he held teaching positions at Pennsylvania State University, American University in Cairo, the University of North Dakota and the University of the Pacific.
- Snaith is frequently interviewed in international, national and regional media. He has been quoted in The Wall Street Journal, USA Today, The New York Times, The Economist and The Guardian and has appeared on CNBC, Fox Business Network, The Nightly News with Brian Williams, Al Jazeera, the BBC and CBC, China Central TV, Sky News, Nippon TV and the Business News Network, based in Toronto.
- Snaith is a sought-after speaker known for his engaging and humorous presentations. He has built a national reputation for his unique ability to explain complex subject matter in a digestible manner. He earned praise from one business editor for having "an uncanny knack of making economics not only understandable but interesting."
- Snaith is a member of several economic organizations and national economic forecasting panels, including The Wall Street Journal's Economic Forecasting Survey, the Associated Press' Economy Survey, CNNMoney.com's Survey of Leading Economists, USA Today's Survey of Top Economists, Federal Reserve Bank of Philadelphia's Survey of Professional Forecasters, Bloomberg and Reuters.
- Snaith holds a B.S. in Economics from Allegheny College and an M.A. and Ph.D. in Economics from Pennsylvania State University.

APPENDIX 10 – LETTER FROM DCMS ON CARBON BUDGETS



Department
for Culture,
Media & Sport

Director, Project Delivery and Major Events
Department for Culture, Media and Sport
100 Parliament Street
London
SW1A 2BQ

John McReynolds
Universal Destinations & Experiences

20 June 2025

Dear [REDACTED],

Thank you for providing details of your Carbon Management Plan and the calculations behind it. The Department for Digital, Culture, Media and Sport (DCMS) have reviewed both and considered them in the context of the carbon budgets and sector specific carbon strategies. Carbon budgets are set nationally and Government does not usually assess individual projects against them.

However, you have made a number of environmental commitments as part of the Agreement in Principle with Government. We note the commitments as part of this and in your Carbon Management Plan to minimise greenhouse gas emissions and overall carbon footprint of the development, as well as your commitment to PAS 2080:2023 and LEED certification which will contribute to the UK's trajectory towards Net Zero by 2050. Following review, the methodology you have used is acceptable and enables consideration of the emissions in the context of the carbon budgets.

We understand that these estimates do not take account of all future government policy or targets on energy provision or decarbonisation - Government may in due course update its guidance on areas including construction and Net Zero requirements for buildings. As your Carbon Management Plan is a living document, we encourage you to work with Government as you further develop it, to ensure its compliance with any new policies and minimise any emissions impact.

Yours sincerely,

[REDACTED]

[REDACTED]