



UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT

Former Kempston Hardwick Brickworks
and adjoining land, Bedford

Environmental Statement Volume 3

Appendix 6.19 - Letters of Comfort – Protected Species Licensing

Report reference: 4.6.19.0

Revision number: 00

Date: June 2025



Date: 13 May 2025
Our ref: 202410008



NatureSpace Partnership Ltd
22 St Peter's Street
Stamford
Lincolnshire
PE9 2PF

BY EMAIL

Dear [REDACTED],

In-principle District Licence coverage: Successful, site is coverable

Legislation: The Conservation of Habitats and Species Regulations 2017 (as amended)

Development proposal: SDO – Universal Destinations & Experiences UK Project

Development location: Manor Road, Kempston Hardwick, Bedford, MK43 9NT

Thank you for your application to cover this SDO site under Bedford Borough Council's great crested newt District Licence scheme. Following an April enquiry and May assessment, NatureSpace Partnership Ltd (NSP) provided a technical report to Universal Destinations & Experiences (UDX) and WSP UK Limited on May 13th 2025.

Assessment

NSP have completed a great crested newt impact assessment to determine the feasibility of licence coverage under Bedford Borough's District Licensing (DL) scheme. Particular attention was afforded to unusual aspects of this case in completing this assessment including the; development size (267ha), local character (high pond density, local wildlife sites and clay pit presence) planning route (SDO) and timescales (intention to be on-site this autumn).

Given the early design stage of the project, this assessment was undertaken assuming a highest impact, whole-site-loss scenario to provide certainty that licence coverage is feasible and to provide client flexibility in site design. Further iterations of assessment to reduce impacts and improve proportionality are expected.

Statement

Following our assessment of the available documents and plans, I can now confirm that, based on the information and proposals provided, NatureSpace Partnership sees no impediment to licence coverage, should the SDO be granted.

This letter of no impediment is issued on the understanding that the following steps of the DL would be completed before authorisation to start works is provided:

- Stage 1/Assessment fees are paid and received

- Any further assessments requested by client are completed and documentation provided
- NSP Terms and Conditions are agreed and signed by UDX
- SDO is granted with DL conditions attached to a working document (e.g. CEMP, LEMP)
- Stage 2/Impact fees are paid and received
- Conditions are discharged
- On-site great crested newt mitigation works (reduced under DL) are completed

Open dialogue on further iterations of assessment, progression of the SDO, on-site mitigation plans and any process delays will be essential in meeting UDX's intended development timeline.

Should you have any queries please do not hesitate to contact me or NSP site assessor [REDACTED] (contact details below).

Yours sincerely,

[REDACTED] Technical Manager

[REDACTED]

[REDACTED] Technical Officer

[REDACTED]

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 [REDACTED]

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.
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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,



Senior Officer (Senior Adviser) – National Delivery
Wildlife Licensing – Chargeable Advice and Strategic Casework
Natural England Wildlife Licensing Service



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 [REDACTED]

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).
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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.

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Yours sincerely,

[REDACTED]

Senior Officer (Senior Adviser) – National Delivery
Wildlife Licensing – Chargeable Advice and Strategic Casework
Natural England Wildlife Licensing Service

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