



UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT

Former Kempston Hardwick
Brickworks and adjoining land, Bedford

Covering Letter

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Date: June 2025





26 June 2025

Via Hand Delivery

Mr. Matthew Pennycook MP
Minister of Housing and Planning
House of Commons
London
SW1A 0AA

Dear Minister,

**INFORMATION TO SUPPORT PLANNING PROPOSAL BY
UNIVERSAL DESTINATIONS & EXPERIENCES**

Introduction

I am delighted to provide this letter and supporting documents regarding a planning proposal for a Universal Entertainment Resort Complex and associated development in Bedford ('the Project'). We believe that these documents provide all necessary information to enable the Secretary of State for Housing, Communities and Local Government to consider and decide whether to grant planning permission for the Project.

First, we would like to extend a sincere thank you to everyone who has helped us get to this stage, not least the people of Bedford, who have welcomed us and through their input during our pre-proposal engagement, helped us to craft a planning proposal that maximises the local opportunities that this unique project brings. We carried out a period of public engagement in 2024 and were delighted that 92% of people supported the creation of a Universal theme park and resort on this site. We do not take this support for granted.

We have worked closely with the host local authority, Bedford Borough Council, to inform our understanding of the baseline condition of the site and surrounding area, assessment methodologies, and approach to mitigation.

Our submission has also been informed by early engagement with numerous organisations including the Department for Transport (DfT), the Environment Agency, Historic England, Natural England, the Health and Safety Executive (HSE), the Internal Drainage Board and the local NHS Trusts and blue light services, as well as the many other local organisations that have helped us to develop the vision for our Project.

We have also been collaborating closely with Network Rail and with East West Rail to understand the impact of our proposals on existing rail networks and to ensure that the transport infrastructure improvements they are designing are appropriate and provide sufficient capacity.

We are extremely grateful for this engagement and the responsive interactions with Bedford Borough Council, its staff and the other organisations mentioned above that helped us to prepare for this submission. Subject to planning permission being granted, we look forward to continuing to develop collaborative working relationships with the community and these organisations as we move into detailed design, construction and operation and to be a part of the fabric of Bedford for years to come.

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Our planning proposal

The planning proposal that we are asking MHCLG to consult on and make a planning decision for is an Entertainment Resort Complex (ERC) comprising a theme park and associated uses including retail, dining, and 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 parking, maintenance and servicing; access routes and circulation spaces; landscaping; utility conveyance infrastructure; and use of land necessary to support construction.

The Minimum Development Programme (MDP) of the ERC to be delivered in the initial phase 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 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 including an environmental enhancement area(s) 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.

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

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

The full Description of Development is provided at Document Reference 1.9.0 of this submission.

In addition, UDX has committed to specific measures in an Employment and Skills Plan (Document Reference 6.12.0) 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 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.

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For the avoidance of doubt, the uses that would be allowed through any planning permission would not exceed the thresholds for Nationally Significant Infrastructure Projects (NSIP) in the Planning Act 2008, as follows:

- The road components for roads operating at 50 mph or above, including limits of deviation, are below the 12.5ha threshold.
- The combined on-site energy generation will not be more than 49.9MW AC.
- The railway-related development will not result in the construction or alteration of a stretch of railway track which has a continuous length of more than 2 km and is in any event on operational land.

The NSIP limits are addressed in the Land Use Limitations Table (Document Reference 6.17.0). Further information on NSIP limits is provided in Appendix 3 of the Planning Statement (Document Reference 6.1.0).

Beneficiaries

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 MDP and the unique provisions of the proposal related to unified design and unified control.

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-consent design 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)).

Key Benefits

The materials provided in the submission that accompanies this letter include information on the impacts and benefits of the Project, which include the following key benefits:

- The creation of 8,050 new jobs once the Project is operational, rising to 10,000 by year 20 of operation. These employment opportunities provide for a diverse range of career opportunities from retail to cutting edge digital technology and creative industries. Our experience in other markets indicates that for every job supported within our theme park, it can be expected that at least 1.5 further jobs would be supported across the economy, resulting in another 12,075 – 15,000 jobs being created in the surrounding communities. We anticipate that approximately 80% of those working at the theme park and resort once operational will come from the local area – specifically from the local authority areas of Bedford, Central Bedfordshire, Luton and Milton Keynes.
- The provision of thousands of further jobs generated throughout the construction phase, with an estimated peak on-site workforce of 5,380, many of whom will be from the local area.
- An Employment and Skills Plan, which includes specific commitments on how we will work with local institutions and businesses to support a healthy and growing economy. As part of our outreach to local businesses, we will also conduct information seminars on how to do business with Universal.
- UDX will establish programs to help shape the future of local communities through uplifting experiences that lead to a positive, lasting impact. These programs will focus on serving local

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community needs, creating unforgettable experiences, and inspiring future innovators. UDX will support implementation of these programs through a combination of community partnerships, charitable financial and in-kind contributions, and volunteerism.

- The infrastructure to facilitate access to the Entertainment Resort Complex includes an expanded train station on the Midland Main Railway Line at Wixams, a new A421 junction, a new public entry road connecting to Manor Road, and significant improvements to Manor Road. It also safeguards land for a potential new railway station on the proposed East West Rail Bletchley to Bedford line, should this come forward in the future.
- A commitment to ecology and landscaping areas that help to celebrate the beauty of the natural world. Our proposals include planting thousands of trees and dedicating large areas for ecological restoration and enhancement.

Justification for proposed consenting route

We consider that making a planning proposal to MHCLG for a Special Development Order (SDO) is appropriate for the following reasons:

1. **Timeliness** – We need planning permission for the Project in 2025 to be able to open the theme park, and to start to deliver the economic benefits of the Project, in 2031. This timeline would not be possible if we were to ask the Secretary of State to consider designating the Project as an NSIP under S35 of the Planning Act 2008 or under other available consenting routes.
2. **Investor confidence** – To make this significant investment, we need a future-focused planning approach that ensures our ability to bring world-class, innovative attractions to the Project well into the future.
3. **National Coordination** – While we enjoy a positive working relationship with Bedford Borough Council as our host authority, the magnitude and complexity of this Project requires coordination among many different agencies at a national level. Further, the pace at which we intend to bring this Project to market means that we must move faster than the local plan is able to progress. It is important to us that this national coordination continues post-consent, should the decision be issued, with government leading on any implementing decisions, as proposed.
4. **Combined consenting route** – An SDO enables us to combine the various components of the Project into a single planning permission, including works to national and local highways, and railway works. This has benefits both in terms of clarity and expedience of current and future decision-making, but also public understanding of the Project components and their relationship to each other.
5. **Global nature of the consent** – We are requesting a bespoke regulatory framework consistent with the consenting approach used for similar ERCs around the globe and that we benefit from in Orange County, Florida where we operate one of our ERCs, (and that which Disney benefits from in Disneyland Paris) which provides the necessary flexibility for us to effectively operate over time. This would not be able to be achieved through the more traditional UK consenting routes.
6. **Benefits beyond local importance** – The benefits of our Project are clearly of more than local importance, indeed extending to regional, national and international significance. To secure these benefits, UDX has committed to deliver the Minimum Development Programme described above from Grand Opening. This level of investment and economic impact from day one, across a wider area than any single local authority, is relatively unique and, together with the international tourism draw of a Project such as this, we consider that it is appropriate for the planning decision to be made at the national level.
7. **Cross-boundary issues** – Our Project is located in the Bedford Borough Council administrative area but is very close to the border with Central Bedfordshire, where many of the local community who will be directly affected by our Project live. The economic impacts of our Project will also be

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felt beyond Bedford across Central Bedfordshire, Milton Keynes, Luton and further afield. Whilst the Project has made significant commitments to public transport, the traffic effects of the Project will also not be limited to Bedford alone and so national co-ordination is required to ensure that these are appropriately considered.

8. **Significant architecture and urban design issues** – Our Project is delivering a significant new development into the locality, with unique architectural and urban design concepts that require national consideration.
9. **National Security** – The Proposed Development is for a large visitor attraction, of which there is no current comparable in the UK, with a peak of 55,000 visitors a day from Grand Opening. This requires sensitive consideration of security matters to ensure public protection which can only be made at a national level.

Supporting Documentation

Our submission is accompanied by a significant volume of materials to support your assessment of the Project. A list of all of the documents and their purpose is described in the Guide to the Planning Proposal, provided at Document Reference 1.4.0.

We trust that this provides you with the necessary information to enable the Secretary of State to consult on and consider making a planning decision.

We are excited to move on to this next step in the process and our teams stand ready to assist in your scrutiny of these documents.

Yours faithfully,

Signed by:

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President, New Ventures
Universal Destinations & Experiences

cc.