UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT

Former Kempston Hardwick
Brickworks and adjoining land, Bedford

**Security and Emergency
Management Plan - Redacted**

List of Appendices

1. Introduction

1.1. This Security and Emergency Management Plan ("SEMP") has been prepared on behalf of Universal Destinations & Experiences ("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.

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 Railway Line and is on the former Kempston Hardwick brickworks and agricultural land. The Site is divided into four main land areas referred to as the Core Zone, Lake Zone, West Gateway Zone, and East Gateway Zone. The proposed ERC lying within these zones would allow a theme park and associated uses including retail, dining, entertainment; visitor accommodation; sport, recreation, leisure and spa facilities; venues with conference and convention spaces; associated services and uses for any operational or administrative functions; utilities generation, storage, collection, treatment, and processing facilities associated with the ERC; vehicle and cycle parking, maintenance and servicing, and transportation hubs; access routes and circulation spaces; landscaping; utility infrastructure; and use of land necessary to support construction. Within this document, the term 'Theme Park' relates to the operational component of the development proposals directly within the control of UDX.

1.3. The planning proposal also includes a series of infrastructure improvements including:
- a new A421 junction;
- a new 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 East West Rail ("EWR") Bletchley to Bedford line, should this come forward in the future.

1.5. This SEMP has been prepared to set out principles for the way in which UDX and other relevant Undertakers, as applicable, will prepare for, respond to, mitigate, and recover from natural, technological and/or man-made hazards.

1.6. Emergency planning will inform every stage of the development and operations of the Proposed Development from the detailed design and site layout to the engineering, processes, and operational plans. The risk assessment process and emergency planning are continually evolving to respond to new hazards and developing technologies. As such, this SEMP cannot contain all applicable security measures, which may change over time to achieve better results or address new risks.

1.7. For the Theme Park and its associated uses, each UDX department will be familiar with and provide training for its respective emergency plan. Individual responsibilities will be clearly assigned so in the event of an emergency the right people are doing the right thing at the right time to keep our guests, employees, and contractors/vendors, safe, while also protecting the surrounding community/property.

2. Background

2.1. UDX has planned and delivered entertainment resort complexes and themed entertainment attractions across the globe. Security and emergency response practices and procedures are globally created, discussed, executed, reviewed and then adapted to new locations to ensure a safe, enjoyable guest experience as well as a safe workplace for our employees and vendors.

2.2. During the early planning of the Proposed Development UDX's internal processes and procedures have focused on ensuring that security factors have been considered as well as being responsive to the security recommendations provided by other stakeholders during the pre-proposal engagement process, including the National Protective Security Authority ("NPSA"), Bedfordshire Police, Bedfordshire Fire and Rescue Service, and East of England Ambulance Service NHS Trust.

2.3. The operational emergency planning measures discussed in this SEMP are for the components of the ERC being operated by UDX, unless specified otherwise. Emergency planning measures implemented at the ERC include both guest-facing areas and non-guest-facing areas.

2.4. Operators of other components of the Proposed Development (e.g., public roads and rail stations) will also implement appropriate emergency planning measures to secure their facilities, which will be integrated with those for the ERC, where appropriate, so that there is an integrated approach to security and emergency management and any potential for grey spaces is addressed.

3. Legislation and Guidance

3.1. The National Planning Policy Framework (NPPF) gives some guidance on how emergency and security planning should be considered in planning applications. Whilst not mandatory, that guidance is a material consideration that has been taken into account by UDX. Paragraph 102 of the NPPF (updated February 2025) (Chapter 8 – Promoting Healthy and Safe Communities) states:

3.1.1. "Planning 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 about the nature of potential threats and their implications. This includes appropriate and proportionate steps are taken to reduce vulnerability, increase resilience and ensure public safety and security."

3.2. Universal acknowledges *CONTEST: The United Kingdom's Strategy for Countering Terrorism* and the role of the private sector in creating safe places, recognizing and countering threats and working with the relevant security services to ensure the safety of all users of the Proposed Development.

4. Unified Control of Development

4.1 Concept of Unified Control

4.1.1.   UDX is seeking consent for an ERC and necessary infrastructure to support the ERC across the Site.

4.1.2.   UDX will be the master developer of the ERC, with National Highways constructing the new A421 junction and Network Rail building the Wixams Railway Station and carrying out works to close the Manor Road level crossing.

4.1.3.   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.

4.1.4.   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 ERC over time.

4.2 Unified Control through an Entertainment Resort Complex

4.2.1   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. The concept of an ERC of this nature, rather than simply delivering a theme park, is what sets UDX apart.

4.2.2   This type of world class ERC is only delivered in the theme park market by UDX and The Walt Disney Company and its affiliated entities ("Disney"), 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.

4.2.3   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 1.09.0)** located in the area designated on the **Parameter Plan Entertainment Resort Complex Land Use Plan (Document Reference 1.10.0)**."

4.3 Unified Control through Enforcement of Beneficiary Clause

4.3.1   The proposed beneficiary clause that UDX has put forth to be included in any Order for the Proposed Development would enhance the Secretary of State's ability to control and enforce this concept of unified control of development for the ERC.

4.4 Unified Control of Design

4.4.1   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 BC 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.

4.4.2   It is envisaged that any Order for the development would require all development within the Site to comply with the following documents, in addition to this SEMP, which will provide ongoing controls on the ERC including:

4.4.2.1   Landscape and Ecology Management measures in the **Environmental Controls (Document Reference 6.16.0)** – contains commitments on management and maintenance of both habitat and landscape areas across the Site, including biosecurity measures.

4.4.2.2   **Design Standards (Document Reference 6.16.0)** – 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.

4.4.2.3   **Zonal Masterplan(s) and Zonal Design Standards** – 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 the Secretary of State pursuant to a condition on the post-consent design review process.

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

5 Stakeholder Engagement

5.1 Bedfordshire Local Resilience Forum (BLRF)

5.1.1 UDX will work alongside the existing Bedfordshire Local Resilience Forum in developing its detailed emergency response plans during both construction and operation. The BLRF brings together emergency services, Local Authorities (Bedfordshire County Council and Bedford Borough Council), the National Health Service and other agencies which are required to respond to a major emergency within Bedfordshire. UDX recognises the benefits of a coordinated approach, and that engagement with the BLRF will provide insight into critical local knowledge.

5.2 Other relevant stakeholder coordination

5.2.1 UDX will also coordinate with the relevant services on other security related matters, including:

- Bedfordshire Police
- Bedfordshire Designing Out Crime Services
- Bedfordshire, Cambridgeshire and Huntingdonshire Counter Terrorism Security Advisor
- Bedfordshire Fire and Rescue Service
- National Protective Security Authority
- British Transport Policy Counter Terrorism
- National Security Services
- Bedfordshire and surrounding area medical facilities

5.3 Regular stakeholder engagement

5.3.1 Regular engagement and coordination with these key stakeholders will provide opportunity for appropriate recommendations to be made and included within the overall design and function of the Proposed Development. The detailed measures will not be made available for public inspection for security reasons. UDX will continue to engage with the relevant bodies on an ongoing basis to ensure measures are up-to-date and reflect the appropriate approach to emergency situations at the time.

6 Security Design Considerations

6.1 Security and Emergency Planning Design Measures

Text redacted

7. Data Security Considerations

7.1 Data Security Purpose

Text redacted

7.2 Data Security Strategy

Text redacted

7.3 Required Compliance with Third Party Security Standard

Text redacted

8 Security Operations

8.1 On-site security management team

Text redacted

8.2 Property perimeter controls & reinforcement

Text redacted

8.3 CCTV surveillance

Text redacted

8.4 Security screening

Text redacted

8.5 CCTV and access control security systems

Text redacted

8.6 Health Services

Text redacted

8.7 Security Patrols

Text redacted

8.8 Security Command Centre (SCC)

Text redacted

8.9 Emergency Operations Centre (EOC)

Text redacted

9. Emergency Management Organisation

9.1 Emergency Management Team

Text redacted

9.2 Emergency Management Policies and Procedures

Text redacted

9.3 Business Recovery Process

Text redacted

9.4 Emergency Resources Manpower

Text redacted

10. Emergency Response Readiness

10.1 Emergency Organisation Structure

Text redacted

10.2 Incident action planning process

Text redacted

10.3 Types of Potential Incidents

Text redacted

10.4 Evacuation

Text redacted

10.5   Building / Facility Evacuation

Text redacted

10.6 Area / Land / Zone Evacuation

Text redacted

10.7 Theme Park Evacuation

Text redacted

10.8 Primary Evacuation Routes

Text redacted

10.9 Alternative Exit Routes

Text redacted

10.10   Stay In Place / Shelter in Place

Text redacted

11. Government Agency Coordination

11.1. Coordination with Outside Agencies

Text redacted

11.2. Coordinated Drills and Exercises

Text redacted

12. Business Continuity Planning

12.1. Business Continuity Plan (BCP)

Text redacted

12.2. BCP Coordination with Local Authorities

Text redacted

12.3. BCP Drills and Readiness

Text redacted

13. Corporate Communications Planning

13.1. Communication of Information to Guests and Team Members

Text redacted

13.2. Alignment with Local Authorities

Text redacted

13.3. Coordination with Other Stakeholders

Text redacted

14 Government Partnership

14.1. Open Communication

14.1.1   At our resort locations across the globe, our partnership and open communication with local and national level authorities is key to our successful operations and response to situations that may arise in the daily operations of our destination resorts.

14.1.2   Open communication and partnership ensures information sharing is efficient, timely and accurate. This includes sharing of planning, processes, facility information and intelligence to ensure cross cooperation support is maintained.

14.1.3   When appropriate, members of UDX participate in government agency emergency operations centre activations, based on the nature of the emergency or situation.

14.2. Partnership with Law Enforcement

14.2.1.   UDX welcomes the deployment of on-duty police officers to safeguard and maintain a presence of law enforcement in addition to our internal security department.

14.3. Partnership with Other Blue Lights

14.1.4   UDX welcomes training with government agencies that UDX work with during the day-to-day operations of our resorts. This includes fire, police, and medical teams from both the local and national levels. This ensures a mutual understanding of the different agencies and how UDX best partner together in the event of emergency situations requiring this level of response.

15 Detailed Confidential Security and Emergency Management Plan

15.1 Detailed Confidential SEMP for the Theme Park

Text redacted

15.2 Detailed Confidential SEMP for Other Undertakers

Text redacted

Appendix A
Acronyms and Defined Terms

Table 1.1 – Acronyms

ACRONYM	DESCRIPTION
AED	Automatic External Defibrillator
BCP	Business Continuity Plan
Bedford BC	Bedford Borough Council
BLRF	Bedfordshire Local Resilience Forum
BLS	Basic Life Support
BOH	Back of House
CCTV	Closed Circuit Television
CPR	Cardiopulmonary Resuscitation
DCMS	Department for Culture, Media and Sport
DfT	Department for Transport
EHS	Environmental Health & Safety
EOC	Emergency Operations Centre
ERC	Entertainment Resort Complex
EWR	East West Rail
LNG	Liquified Natural Gas
MFA	Multi-Factor Authentication
MHCLG	Ministry of Housing, Communities & Local Government
NHS	National Health Service
NPPF	National Planning Policy Framework
NPSA	National Protective Security Authority
SCC	Security Command Centre
SEMP	Security and Emergency Management Plan
UDX	Universal Destinations & Experiences

Table 1.2 – Defined Terms

The following definitions shall apply to the terms used in this document:

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.
Active Travel	Making journeys by physically active means, like walking and cycling.
Bedfordshire Local Resilience Forum (BLRF)	A statutory body covering a police force area, designed to bring together category 1 and 2 responders for multi-agency co-operation and information sharing formed under the Civil Contingencies Act (2004). The Bedfordshire Local Resilience Forum (BLRF) brings together the emergency services, local authorities, National Health Service and other agencies which are all required to respond to any major emergency in Bedfordshire.
Business Continuity Plan (BCP)	A comprehensive business continuity plan to ensure the Entertainment Resort Complex, including the Theme Park, can maintain or resume regular operations in a timely manner following an emergency event.
Core Zone Perimeter Masterplan	Means a master plan for the Core Zone which shall include details of the following: (a) the location of any sub–zones within the Core Zone; (b) the areas of the Entertainment Resort Complex to be provided within the Core Zone Perimeter; and (c) the areas for vehicular, pedestrian and any cycle routes within the Core Zone Perimeter
Core Zone Transport Hub	The area shown on **Parameter Plan – Core Zone Transport Hub (Document Reference 1.13.0)**.
Emergency Management Team	A branch of the UDX security department responsible for the planning and coordination of emergency response across the ERC.
Entertainment Resort Complex (ERC)	The proposed Theme Park (as such term is defined in this Glossary), 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)** and located in the area designated on the **Parameter Plans – Entertainment Resort Complex Land Use Plan (Document Reference 1.10.0)**. For the sake of clarification, the

	ERC includes the Entry Plaza and Entertainment Resort Complex Support, as such terms are defined in this Glossary.
Entertainment Resort Complex Support (ERC Support)	Associated services and uses for any operational or administrative functions of the Entertainment Resort Complex, such as office buildings and warehouse/storage facilities.
Entry Plaza	Located in the Core Zone, this restricted access area is outside of the ticketed area but requires visitors to pass a security screening before entry which accommodates primarily themed retail, bars, restaurant and entertainment uses located in conjunction with the primary entrance. It is aimed at encouraging ticketed guests to extend their visit to the Entertainment Resort Complex by arriving earlier than the park's opening time or staying longer after the park's closing time. Whilst these uses are designed primarily for ticketed guests, they could be used by the general public.
Fireworks	Fireworks shall mean those articles within UN 0335 1.3G, as the same may be modified or replaced from time to time and shall not otherwise include pyrotechnics within UN 0431 1.4G both as defined in the United Nations (2023) *Transport of Dangerous Goods Model Regulations Volume 1, 23rd revised edition* (Available at UN Model Regulations Rev. 23 (2023)	UNECE) [Accessed on 7th June 2025].
Full Buildout	Full Buildout consists of construction of the balance of the ERC, roads, utilities and rail-related development that was not completed during the Primary Phase (assumed to occur over a twenty-year period following the Primary Opening Year, completing in 2051) and operation of same thereafter, including the evolution and expansion of the same over time in accordance with the planning permission.
Grand Opening	The date on which the Theme Park within the ERC officially opens to the general public (excluding its Soft Opening Period, if applicable) with a majority of its attractions operational.
National Highways	The government agency responsible for Strategic Road Network (SRN) building, maintenance and operation and has the power to direct a refusal of a planning application which it believes would adversely affect the operation or safety of an SRN.
Network Rail	The government agency responsible for building, maintenance and operation of the railway network in England, Scotland and Wales and has the power to direct a refusal of a planning application which it believes would adversely affect the operation or safety of said railway network.
Proposed Development	All elements of the proposed development that will form the basis of any planning permission granted for the planning proposal.

Roadways	Public roadways (and associated Active Travel) to be provided within the limits of deviation shown on **Parameter Plan - Access and Roadways (Document Reference 1.11.0)**.
Security and Emergency Management Plan (SEMP)	A plan containing security and emergency management measures for the whole ERC, including maintaining a secure perimeter, access control and a central security command centre, as well as requirements for coordination with blue lights on integrated planning and response. The SEMP aims to deliver security controls that include collaboration between security professionals and UDX during the detailed design process, including both physical and technological solutions, that will serve to eliminate grey spaces and create more defensible spaces.
Security Command Centre (SCC)	**Text redacted**
Secretary of State	The Secretary of State for Housing, Communities and Local Government.
Soft Opening Period	Any period prior to the Grand Opening when some or all of the Theme Park on the Site is open for technical rehearsal to allow employees an opportunity to deliver guest services in a real-time operating mode, but in a controlled environment for training purposes (e.g., limited attendance, limited hours, and/or limited attraction availability).
Site	Means all the land edged red on the **Site Location Plan (Document Reference 1.6.0)**.
Statutory Undertaker(s)	Any statutory undertaker mentioned in Section 262(1) of the Town and Country Planning Act 1990 (as amended) or in the definition of 'statutory undertaker' in Article 2(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)".
Team Member(s)	Staff employed by UDX to work at the Proposed Development.
Theme Park	Theme park(s), amusement park(s) and/or water park(s) located in the Core Zone consisting of buildings, structures and facilities for tourism and leisure uses comprising theme parks, amusement parks and/or water parks uses, including: a) events spaces, rides, attractions, pools, shows, entertainment venues, art and creative imagery, theatres, and cinemas, all or some of which may involve water, special effects (including fire), and/or be enclosed; b) retail, dining and entertainment facilities comprising venues for the sale of food and drink (including indoor and outdoor alcoholic beverage venues), retail venues, music and entertainment venues, dance clubs, nightlife entertainment and related ancillary facilities, support facilities, kitchens, storage, loading, security, servicing and laundry services to support these uses;

	c) permanent and/or temporary exhibition or multi-use spaces, including seasonal event venues and spaces; d) visitor facilities; e) visitor entrance areas, including ticketing points, turnstile structures, and ancillary commercial uses; f) security plaza, including screening facilities (such as metal detectors and x-ray machines); g) ticketing facilities; h) parades, shows and displays, including use of drones, indoor and outdoor concerts, fireworks, pyrotechnics, laser, light or projection shows, and seasonal events; i) any other similar, related or ancillary use.
Universal Destinations & Experiences ('UDX' or 'Promoter')	Universal City Studios LLC, Kempston Hardwick Developments Limited, SC Collection Limited and/or any of their group companies involved with the ownership of the Site or the ownership or operation of the Theme Park.
Undertaker(s)	The persons (corporate or otherwise) who are permitted to carry out the Proposed Development (including their contractors and other persons appointed by them in connection with the carrying out of the Proposed Development).
Zone	Each of the Core Zone, Lake Zone, West Gateway and East Gateway as shown on Zonal Plan (**Document Reference 1.8.0**).

Appendices B and C have been redacted in their entirety.