

Bedford Borough Council

Entertainment Resort Complex - Universal destinations and experiences - SPECIAL DEVELOPMENT ORDER STATUTORY CONSULTATION RESPONSE

1.0 INTRODUCTION

- 1.1 Universal Destinations and Experiences (UDX; the applicants) have submitted a request to the Ministry of Housing, Communities and Local Government (MHCLG) to grant planning permission for an Entertainment Resort Complex and associated development at the former brickworks and adjoining land in Kempston Hardwick (please see Site Location plan, Appendix F). The development site has 268 hectares, and the proposal includes provision for a theme park and associated facilities such as retail, dining, and hotels, divided into four zones.
- 1.2 MHCLG has been asked to consider granting planning permission by making a Special Development Order (SDO) for the proposal under Section 59 of the Town and Country Planning Act 1990, which will be determined by the Secretary of State for MHCLG. 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 (the Council).
- 1.3 The Council acknowledges the unique character and scale of the proposed development, which may not be fully covered by the Council's Development Plan, justifying the request made a Special Development Order. The review of the documents and comments hereby provided consider this context.
- 1.4 The Council have been formally consulted as a statutory consultee by MHCLG in respect of the proposed development. Council's officers have reviewed the Environmental Statement and other documents accompanying the request, as listed in Appendix D. This report sets out our response to each of the submitted documents where applicable.
- 1.5 It is noted that the Council's role in responding to the consultation differs to our role as local planning authority when determining planning applications. In these cases, we consult external bodies so that we can take account of their views in the decision-making process. In the case of this particular assessment, the Council is not the decision maker, and the views of external bodies are being sought and considered by the Secretary of State for MHCLG and will inform the decision-making process for this planning application.
- 1.6 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 (as there is for Nationally Significant

Infrastructure Projects). As a general principle however, national and local planning policy are still material considerations for the Secretary of State to consider when deciding whether to make a planning decision.

2.0 THE SITE AND THE PROPOSAL

- 2.1 The site is in a rural location adjacent to the southwestern edge of Bedford's urban area and southeast of the A421, entirely within Bedford Borough Council's administrative area. It broadly sits to the east of the Marston Vale Railway Line (MVL) and to the west of the Midland Main Line (MML) and Ampthill Road. Local access is provided by Woburn Road running in parallel on the A421's eastern edge and connecting to Broadmead Road running along the southern edge of the site. Access is also from Manor Road, which bisects the site. Existing waterbodies bound the site to the north, east and southeast.
- 2.2 There are residential properties with direct frontage along Manor Road, in addition to the CEMEX Bedford Concrete Plant and BCA (British Car Auctions) sites. Warehouse units sit to the northwest beyond the MVL, and agricultural land and open fields are to the south and southwest, beyond MVL and Broadmead Road. Wootton is located further west of the site, beyond the A421 and approximately 930 metres from the western site boundary. Kempston Hardwick and Wixams are immediately to the east of the site boundary; most of which are beyond Ampthill Road and the MML. Stewartby is approximately 230 metres further to the south of the site beyond Broadmead Road and agricultural fields.
- 2.3 The northern part of the site is the former Kempston Hardwick brickworks, with an area of unused hard standing, associated with the former use, along with stockpiles of former demolition waste. The northern part of the site also includes areas of grass scrub and arable farmland used to grow crops and previous clay extraction pits, now either in-filled or flooded semi-permanent waterbodies. The southern part of the site comprises primarily arable fields, hedgerows and drainage ditches. Elstow Brook, a tributary of the Great River Ouse runs along the western part of the site and diverges towards its southwestern portion and the A421. Public rights of way (PRoWs) 1 and 2 cross the southern part of the site in the east/west and north/south directions respectively, and the footpath (also a PRoW) 8 crosses a small edge of the site, to the northeast. PRoW/ Footpath 1A sits alongside the northern boundary of the site, linking footpath 8 with the A421.
- 2.4 The planning application is made to obtain planning permission for the construction and operation of a Universal Entertainment Resort Complex (ERC) and associated development. The proposed development is divided in four main site areas referred to as Core Zone, Lake Zone, West Gateway Zone, and East Gateway Zone. The proposed 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.

- 2.5 The 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 Midland Main Line (MML) at Wixams (providing 4 platforms rather than the 2 consented platforms); improvements to Manor Road; and improvements to certain other local roads. The proposal also safeguards land for a potential new railway station on the proposed East West Rail (EWR) Bletchley to Bedford line; however the ERC is independent of this coming forward in the future.
- 2.6 The proposed approval process would give permission to the 'authorised development', as detailed in the Description of Development (Document 1.9.0), and includes all areas within the red line boundary shown in the Site Location Plan (Document 1.6.0). The proposed primary access points are shown in the Primary Access Plan (Document 1.7.0), which would also be approved with the SDO. These documents are intended to comprise the operative part of the authorised development, if planning permission is granted
- 2.7 A set of controlling documents are also proposed, setting out controls that the authorised development must be carried out in accordance with. These will be part of the SDO, if made, and include the Zonal Plan (Document 1.8.0), Parameter Plans (documents 1.10.0 to 1.15.0), Travel Plan (Document 4.5.6.0), Design Standards (Document 6.3.0), Security and Emergency Management Plan (Document 6.4.0), Environmental Controls Document (Document 6.16.0), Land Use Limitations Table (Document 6.17.0), and Dependencies Table (Document 6.18.0).
- 2.8 There are also Proposed Conditions (Document 1.5.0) which will secure Construction and Environmental Management Plans (CEMPs) for the authorised development. These are aimed at ensuring that the mitigations for the construction phase set out in the Environmental Statement (ES) are implemented. Other proposed conditions also secure the arrangements for the Temporary Workforce Accommodation, and for approval of masterplan and design standards for future phases, as well as details relating to layout, landscape, appearance, access and scale.
- 2.9 The submitted application is structured in the following sets of documents, which were reviewed by the Council's internal team:
 - Introductory Documents and Drawings – including documents such as Description of Development (Document 1.9.0), Proposed Conditions (Document 1.5.0) and Parameter Plans (documents 1.10.0 to 1.15.0).
 - Environmental Statement (ES) Chapters, Figures and Appendices – including the topics of Traffic and Transport (Document 2.5.0); Ecology and Nature Conservation (Document 2.6.0); Landscape and Visual (Document 2.7.0); Air Quality (Document 2.8.0); Noise and Vibration (Document 2.9.0); Cultural Heritage and Archaeology

(Document 2.10.0); Ground Conditions and Soils (Document 2.11.0); Water Resources (Document 2.12.0); Socioeconomics (Document 2.13.0); Greenhouse Gases (Document 2.14.0); Climate Resilience (Document 2.15.0); Major Accidents and Disasters (Document 2.16.0); Population and Human Health (Document 2.17.0); and Cumulative Effects (Document 2.18.0).

- Non-Technical Summary of the Environmental Statement (Document 5.1.0).
- Other Documents – including Planning Statement (Document 6.1.10), Design Standards (Document 6.3.0), Dependencies Table (Document 6.18.0), Employment and Skills Plan (Document 6.12.0), and Sustainability Statement (Document 6.8.0).

3.0 BEDFORD BOROUGH COUNCIL'S COMMENTS

3.1 Having had our technical specialists review the relevant documents; we have set out a detailed summary of our internal comments in this report. Full Council is recommended that the following comments are submitted to the Secretary of State for the Ministry of Housing, Communities and Local Government (MHCLG), as decision maker in respect of the proposed development:

ENVIRONMENTAL STATEMENT

Chapter 2 – Description of Development (Document 2.2.0)

- 3.2 The Council is satisfied that the description as set out in Chapter 2: Description of Proposed Development (Document 2.2.0) is an appropriate basis for the assessment of the impacts from development.
- 3.3 We note the submitted documents also include a separate Description of Development (Document 1.9.0), for which planning permission would be granted, also identified in the submission as 'authorised development'. As the request was made under Section 59(3)(b), this description would therefore be part of the SDO and has therefore guided the planning assessment in terms of the principle of development.
- 3.4 As the site falls within Bedford's countryside, the proposal has been assessed against Policy 7S of Bedford's Local Plan (2030). Whilst there is not a requirement for compliance in relation to the Development Plan, officers have reviewed the main use within the 'authorised development' description. This includes the theme park, associated with hotel, sports, convention and retail provision and it has been concluded that the development would be justified by the exception cases within Policy 7S.
- 3.5 The Council is satisfied that it has been demonstrated that the development responds to an identified community [national] need; and that there is an identified community support, in line with Policy 7S (vi) and (vii). Other points in the exception requirements of Policy 7S are discussed in detail in this report.

Outline Construction Environmental Management Plan (OCEMP) (Document 4.2.3.0)

- 3.6 Officers note the approach in the proposed Condition 5 (Construction and Environmental Management Plan) (CEMP) (Document 1.5.0) requiring any future phase of development to have its own CEMP approved before commencement. The CEMPs are required to include mitigation for several areas within the ES, including different types of pollution, materials storage and compounds, construction waste, management of surface water, natural environment and cultural heritage protection, arrangements for management of the impacts on population and human health, major accidents and greenhouse gas emissions, as well as the appointment and retention of workers.
- 3.7 The Council acknowledges that in the event that permission is granted, the SDO will overlap with other legislation listed in Annex 1 of the OCEMP (Document 4.2.3.0), including the Control of Pollution Act 1974. Ideally, the Council would prefer that measures were enforceable (specific, measurable, achievable, realistic, and time-bound), and we would restrict the scope of the OCEMP to matters which cannot be controlled through other legislation and which are related to avoiding harm to neighbour amenity.
- 3.8 Notwithstanding the above position, the Council accepts the approach given for the CEMP to identify the main environmental mitigation measures associated with the construction phase of the proposed development. We are supportive of the proposal for future stages to include its own CEMP and for the Principal Contractor to be the first port of call for residents' complaints. Comments relating to each ES topic and the proposed mitigation within the OCEMP are set out with the respective ES Chapter on other sections of this report. We would welcome consideration of those construction traffic routes that avoid Stewartby as part of any permission and future CEMP, considering the village's proximity to the site.
- 3.9 The Council would like to recommend that for clarity, paragraph 5.(1) of Condition 5 (Document 1.5.0) should read 'The Promoter shall not carry out any part of the Authorised Development [...]' instead of 'may not carry out'. We also suggest that paragraph 5(n)(i) of proposed Condition 5 (Document 1.5.0) include not only site access but also vehicle holding areas to address early arrivals to site, as part of the regulation of construction vehicle movements onto and from the application site. The Council supports the wording in paragraph 5(n)(iii) 'to avoid queues of vehicles forming'. The Council would also suggest that under 5(e)(ii) a requirement is included for all monitoring reports to be made available to Bedford Borough Council on request, reflecting Paragraph 3.6.1 of the OCEMP (Document 4.2.3.0) in relation to monitoring air quality during construction.
- 3.10 It is noted that part 5(1)(b) of proposed Condition 5 (Document 1.5.0) provides that each CEMP will be determined by the Secretary of State. It is important to note that other developments in the area will affect the area within Bedford Borough during construction. It is expected that the Secretary of State as decision-maker in assessing future submissions to discharge Condition 5 will enable a level of co-

ordination across different CEMPs reflecting different stages of the proposed development, and all impacts addressed by the CEMPs. Furthermore, we expect that the assessment would involve consultation with the Council, to ensure co-ordination with other developments under construction in the area, securing the overall intended mitigation of impacts, including from construction traffic. To allow meaningful participation of the Council in the process, we would like the opportunity to provide comment to MHCLG during any CEMP review process it may undertake pursuant to proposed Condition 11(1)(c)(Document 1.5.0) .

- 3.11 In relation to Manor Road, on-going discussions with the Council's Highway Fleet, Traffic and Operations team are taking place with UDX to co-ordinate the need for any road closures during construction. A commitment to maintaining access to all properties along Manor Road not owned by UDX is set out in item 6 of the Land Use Limitations Table, another controlling document part of the planning permission, if granted. This is supported.

Chapter 3 – Approach to EIA (Document 2.3.0)

- 3.12 The Council agrees with the approach to the Environmental Impact Assessment (EIA) as set out in the Chapter 3: Approach to EIA.

Chapter 4 – Consideration of Alternatives (Document 2.4.0)

- 3.13 The Council agrees with the alternatives considered in the EIA, as set out in the Chapter 4: Consideration of Alternatives.

Chapter 5 – Traffic and Transport (Document 2.5.0)

Assumptions and Proposed Infrastructure

- 3.14 The Council agrees that the development site can be made highly accessible from both the north-south, and east-west UK railway networks. It can also be made accessible to the UK's strategic road network, through the proposed direct connection at the A421, with connections to the M1 motorway and the A1, towards London and the rest of the UK in all directions. The local road network connects across the site between the B530/ Ampthill Road in the east to Woburn Road/Bedford Road to the west.

- 3.15 The Council agrees that the development will be within easy reach of many of the UK's major airports and a direct rail connection to London's Eurostar terminal, the UK hub for rail connections throughout Europe. We also agree with the assumption that there will be good connections at the local scale, and that operation and construction workers will be able to get access by a choice of means of transport, which if managed and enforced by the Undertakers, will ensure that local towns and villages are protected from inappropriate traffic and traffic volumes, considering the proposed mitigations and recommendations in this report.

- 3.16 There are two major new pieces of transport infrastructure in the planning proposal: a new railway station at Wixams, that enlarges the currently planned and consented station; and a new road junction on the A421, including a new eastbound off slip into the site, and new westbound off slips into and away from the site. To provide access between the proposed four-platform Wixams Station in the east, particularly for the proposed shuttle bus and local workers' access, Manor Road will be realigned and improved. The Council agrees with the assessment considering the new proposed infrastructure and improvements, which are discussed in more detail in the next sub-sections.
- 3.17 The Council is reliant on the traffic data modelling approved by the Department for Transport (DfT). The Council is also understanding that the design of the proposed junction of the primary site access with the A421, including the proposed scheme for slip-roads has been agreed by National Highways, as highway authority for this section of UK's strategic road network. The Council remains supportive of a future four-directional junction at this location, however if a different design is not viable, detailed design for the junction including signalisation and signage to direct drivers exiting the site in the westerly direction for return to the easterly direction at the roundabout in Shelton/ Marston Moretaine, avoiding the use of local roads such as Woburn Road.
- 3.18 In terms of policy compliance noted by the Transport Policy team, the Planning Policy team has confirmed that the South of Bedford Masterplan is not adopted and was being prepared in tandem with the Local Plan 2040. Given the current status of this latter Plan, the Council is likely to revisit the Masterplan as part of a review of the Council's planning policy provision for the future. In relation to the Bedford-Milton Keynes Waterway Park, officers note that the route for the waterway as described in the Council's Allocations and Designation Plan 2013 does not affect the SDO site directly, as the route is located further west of the site, beyond the A421. The site however does fall within Zone 4 Bedford to Milton Keynes-Marston Vale of Policy AD24, and in this instance, the development improves access routes connecting with the Bedford Green Wheel, as required in the Policy. This is supported.
- 3.19 In light of the request for permission using an SDO being made to the Secretary of State for Housing, Communities and Local Government, ultimately the assessment criteria surrounding the organisation and scope of documents in the submission will fall in their remit. From the Council's point of view, the information provided is proportionate to the level of information available about the development at this planning stage and is sufficient for this assessment.

Travelling Patterns and Impact Assessment

- 3.20 The submitted Transport Assessment (TA, Document 4.5.1.0) considers an estimated average of 23,000 visitors per day on the Opening Year in 2031, growing to 31,250 visitors in the Future Year scenario, with the full build out of the ERC, estimated to 2051. In addition, 8,050 people are expected to be working in the Opening Year and

a total of 10,000 people in the Future Year. These numbers will have different impacts on the highway network as workers will be available in three different shifts, with a maximum of 80% required at peak days. Visitors are also expected to arrive and depart in hours outside usual commuting peak. The TA also considers the implementation of the infrastructure proposed with the application, namely a new A421 Junction; an expanded railway station on the Midland Main Line (MML) at Wixams; improvements to Manor Road and other local roads, including Broadmead Road and Ampthill Road, as set out in the Dependencies Table (Document 6.18.0). This is supported.

- 3.21 The Transport Vision for the assessment considered that UK visitors would access the development in a 40:40:20 split between road, rail and 'other' modes respectively, where 'other' modes include dedicated coach travel, local bus and taxi travel. Based on this Vision, an assessment of demand in the Future Year was developed using a logit model, resulting in a predicted share mode for all domestic and international visitors divided in the majority travelling by train (40.32%), followed by car (31.98%), coach (23.88%), taxi (2.87%) and local bus & hotel shuttle (0.9%). The assessment also predicts that workers of the theme park only (team members) will in the Future Year mostly travel by car (62%), followed by local bus and shuttle (19%), rail (17%) and active travel (2%). The Travel Plan (Document 4.5.6.0) aims to address this trend by offering more options for sustainable and active travel in the area, as discussed later in this section of the report.
- 3.22 The TA (Document 4.5.1.0) also sets out that, based on the applicants' experience from other resorts, the proposed development will typically be busiest at weekends, during holiday periods and outside of the traditional UK commuter peaks. Looking at the Future Scenario and based on the operation of other similar theme parks around the world, the TA considers that there will be in the order of 15 peak days, there will be approximately 35 days of 'busy' period, and the remainder, approximately 315 days, the proposed development will operate at its 'average' intensity of 31,250 daily visitors or lower.
- 3.23 We reiterate that it is not compulsory that the application is planning policy compliant, if determined using the Special Development Order provisions. It is however noted that the Council has been party to the evolution of the TA methodology and the assumptions used for the purpose of assessment. The Council agrees that the scope of the TA, and the assessment assumptions are reasonable and appropriate for the purpose of assessment, in the context of the proposed approval process. The Council is satisfied with the assessment of the effects and the importance of the effects, considering the context and the proposed monitoring strategy.

Transport Mitigation

- 3.24 There will be residual effects on the highway network resulting from the proposed development. The network will be busier in what are currently off-peak periods and weekday peak periods, with significant effects, both adverse and beneficial at

operation. For the construction phase of the development however, temporary adverse effects are expected particularly in relation to amenity of non-motorised users, such as pedestrians and cyclists.

- 3.25 The mitigations for the construction phase are included in the proposed Condition 5 (Document 1.5.0), requesting among other items, (i) the regulation of vehicle movements onto and from the application site (identified as 'SDO land' in the document), including site access arrangements; (ii) details and phasing of routing for vehicles travelling to and from the application site in connection with construction work; (iii) the management of deliveries to the application site; (iv) measures and activities to maximise the uptake of sustainable modes of transport by construction workers travelling to and from the application site; and (v) measures to prevent the deposit of mud and other deleterious material on roads surrounding the application site. These are supported.
- 3.26 The mitigation proposal for the operational phase of development is for trip making to and from the ERC to be controlled by the Monitor and Manage Plan, included within the Travel Plan (Document 4.5.6.0, Appendix B, Part B-1), one of the controlling documents for the development, if permission is granted. The Monitor and Manage Plan sets out that in the event of exceedance on the controlled trips, restrictions for Separately-Ticketed Events to no more than 15 days in any Monitoring Period (i.e. quarterly) will apply. The Theme Park Operator will be required to issue a framework Improvement Scheme in the event of a Continued Exceedance to the local highway authority and/or National Highways (as applicable), specific to the nature and character of the continued exceedance. The Council accepts that the Monitor and Manage Plan alongside the proposed infrastructure and highways improvements offer a level of mitigation appropriate for the current planning stage, we would like to see reassurance from the HM Government on how further mitigations may be secured in the event that the provisions in the Monitor and Manage Plan are not effective.
- 3.27 We welcome the proposed monitoring during the community's peak periods of 7-9am and 4-7pm, to account for school and other traffic which already affects the local and strategic network surrounding the ERC site, outside those hours. The Council is supportive of the Transport Steering Group (TSG) enabling further discussions in the event the ERC changes the peak patterns, requiring a new monitoring and management strategy to be agreed.
- 3.28 We support the establishment of the TSG prior to commencement of construction work on the site, to address issues arising from the construction phase of the development. We acknowledge and support the transition of the TSG into a role in reviewing the performance of the Travel Plan (Document 4.5.6.0) and any Travel Plan Statements for the proposed development, monitoring and reporting while the ERC is operational. The Council notes the proposal for its participation on the TSG as local highways authority (LHA) and suggests that the TSG meets monthly during

construction of the Primary Phase and for the first five years of operation of the ERC, as a minimum, when the Monitor and Manage Plan provisions will continue to apply.

Parking

- 3.29 The TA (Document 4.5.1.0) explains that the proposed parking numbers are not allocated specifically to areas of the site in order that flexibility in design and operation is maintained. A minimum parking number is proposed on the principle that there will always be enough parking to satisfy demand, with 11,197 spaces provided at the Opening Year (minimum) and 16,661 spaces provided at the Future Year (maximum). In relation to coach parking, a maximum of 200 coach parking spaces should be provided, with a minimum of 100 spaces at Grand Opening (first day of the theme park's operation for the public).
- 3.30 The parking spaces will serve all uses within the ERC, except for the parking related to the East Gateway Zone (i.e. Wixams station). This is acceptable as the enlarged station would still benefit from the parking approved with the extant planning permissions (outline planning permission reference 11/01380/M73 and reserved matters consent reference 23/02136/M73), as described elsewhere in this report.
- 3.31 The TA annexed Parking Note (Document 4.5.1.10.0) sets out the approach taken in determining a minimum and a maximum car parking provision for the proposed development. The note explains that the range is largely due to an allowance for the proposed theme park to grow between the Opening Year and the Future Year development, along with the use of likely parking demand figures for non-theme park uses derived from the TA (Document 4.5.1.0). These latter consider the maximum parking standards derived from the Council's Parking Standards for Sustainable Communities SPD. This is supported.
- 3.32 We note Transport Policy's comments about a potential conflict between the number of car parking spaces to satisfy demand as described above, and the daily vehicular movements of 6,048 used as a baseline threshold in the Monitoring and Manage Plan. This is likely to be due to the expectation that the greatest number of vehicles would enter or exit the ERC site outside the peak hours, when the 2,792 vehicles in the morning and 3,256 vehicles in the afternoon (totalling the 6,048 figure) cannot be exceeded. The Council has been advised by UDX that the traffic model and the baseline thresholds were created for the site in collaboration with the Department for Transport (DfT) and National Highways, using their data and applied trends and models from their other resort operations. This is supported.
- 3.33 The proposed development will deliver electric vehicle (EV) charging provision in all car parks exceeding 10 car parking spaces, where a minimum active EV charging will be provided for 3% of the total car parking spaces in each car park. An overall minimum of active EV charging provision across all car parks within the ERC is proposed at 5% of the total number of car parking spaces at any given time. An additional 5% of the total car parking provision within the ERC will also be provided

with passive provision (i.e. spaces fully wired and ready for future connection, but without the charger provided). This is secured in the CP02 standard in the Design Standards (Document 6.3.0) and is supported.

- 3.34 The Council has not identified a control to ensure provision of disabled parking spaces. We suggest this is an additional standard applied site wide as part of the Design Standard document.
- 3.35 The proposed cycle parking provision for the development will be in total 644 short stay cycle parking spaces and 812 long stay cycle parking spaces. Officers suggest these figures are significantly raised having regard to evidenced success elsewhere in the Borough, however the Council is satisfied with the provision in line with the current local requirements, as set out in the Parking Note submitted in support of the application. Nevertheless, we would welcome consideration for part of the car parking area to be reserved for future cycle parking, considering the aims of the Travel Plan (Document 4.5.6.0) to reduce car use in the future. This could be secured in the Design Standards (Document 6.3.0) document.
- 3.36 Further to the above, the Design Standards (Document 6.3.0) could secure that the design of the cycle spaces follows the Council's Parking Standards for Sustainable Communities SPD for the site-wide ERC. The Design Standards document could also secure a minimum of facilities for non-motorised users, including storage and showers for UDX team members. We note officers request for a mechanism to restrict new car parking areas/ spaces; however, these are restricted by the car parking provision in the Design Standards, set out as the 'maximum' provision.

Active Travel

- 3.37 The Bedford Local Plan 2030 Policy 90S expects new development to explore opportunities to deliver sustainable transport, therefore the Council is supportive of the proposal providing for active travel facilities within the site, enabling north-south and east-west connections. This will be provided by way of pedestrian and cycling routes along Public Roads A and B, which will be offered for adoption by the Council. This is secured in the Active Travel Parameter Plan (Document 1.12.0), which is considered to address the matter adequately. Our understanding is that the information has been prepared using information provided by the Council in relation to the local highway network.
- 3.38 We note the applicants' flexibility to adapt to Network Rail's proposals for the delivery of a road bridge over the Marston Vale Line (MVL) replacing the existing Manor Road level crossing. The current consented road bridge does not include active travel infrastructure. The application indicates the possibility for the consented road bridge to be replaced by an active travel bridge across the MVL and two U-turning facilities on each side of the railway, whilst maintaining the proposal to close the level crossing. This is the applicants' preferred option and so is the Council's, as it maintains this key link available for pedestrians and cyclists in the local area.

- 3.39 Consistency and continuation of the pedestrian and cycle paths along Manor Road would be the Council's preference, and we note the proposals including the realignment of the section of Manor Road part of the site (to the east of the MVL), which will tie in with the road's section to the west of the scheme. This latter section will be part of the provision of the active travel connections between Manor Road and Wootton, with Council's projections for design to complete by October 2025 and construction from the first quarter in 2026. The Council expects the refined design discussions to take place as part of any S278 agreement of the Highways Act 1980 and highways works approvals set out in the Dependencies Table (Document 6.18.0) approved with the SDO.
- 3.40 The Council recognises to promote connectivity to the surrounding and proposed active travel network, a small section of approximately 30 metres along Woburn Road between the junction with Manor Road and the footway and bridge over the A421 is not included as part of the Council's works or the proposed development. The Council would therefore support adding this to the Local Walking and Cycling Infrastructure Plan (LWCIP).
- 3.41 The Council notes the proposed onward improvement to the cycleway/ footway along Ampthill Road. Footways and cycleways are proposed along Manor Road, connecting the future Wixams Station to Kempston Hardwick Station, and the land safeguarded for the EWR station, if this comes forward. This is supported, and detailed design for the provision of such infrastructure is currently discussed with the Council as Highways Authority in the scope of legal agreements under S278 and S38 of the Highways Act 1980, if permission is granted for the proposed development.
- 3.42 Links into Wixams are included in this proposal to the limits of the red boundary, which will tie-in with the existing proposals for the village, with outline permission granted reference 11/01380/M73 and reserved matters reference 23/02136/M73. Shortstown is not located in the vicinity of the development and future improvements will have to be allocated through the delivery of new development in the South of Bedford framework, if this is confirmed in any future revision of the adopted Local Plan. The nearest section of the Sustrans Varsity Way / Route 51 Oxford to Cambridge is located to the west of Wootton, and therefore not in the vicinity of the proposed development.
- 3.43 The Council expects that detailed highway design including drainage, wayfinding, lighting, controls and widths for all modes in the proposed and enhanced routes will be discussed in meetings with the applicants' consultants post-consent, regarding highways design to meet Council's standards for adoption. It is noted that the approval of the highways works, and delivery of the infrastructure are secured in the Dependencies Table (Document 6.18.0), which would be one of the controlling documents for the proposed development. This is supported.
- 3.44 The existing walking routes (PRoWs) 1 and 2 crossing through the Core Zone will be diverted along the newly created new Public Road A and Manor Road. The changes

to PRowS 1 and 2 have been discussed with the Council's Countryside and Public Access team, who have agreed with the stopping up/ diversions to the routes. The new and enhanced network is secured by the Active Travel Parameter Plan (Document 1.12.0), which is proposed as controlling document.

- 3.45 To address the Council's Rights of Way Improvement Plan (ROWIP) and the proposed mitigations to the impact of the proposal, the temporary and permanent PROW closures need to be formalised by individual public path order applications submitted to the Council's Rights of Way Team (unless these provisions are overridden by the SDO process). This shall include (i) the extinguishment of Right of Way through the site; (ii) the diversion of a Right of Way through the site; and (iii) the Creation of a Right of Way along the eastern boundary of the Core Zone.
- 3.46 The Council's Countryside and Public Access team require that controlled crossing will also be required at the end of Bridleway 23 and Woburn Road and at Manor Road to the west of the level crossing, alongside surface improvements and lighting to the off-road route adjacent to Manor Road in its section to the west of the Kempston Hardwick station. These are expected to be included in the design and implementation already programmed by the Council and will be dependent on the final type of bridge/ crossing over the MVL trainline.
- 3.47 Officers also suggest the development could interface with the emerging Local Walking and Cycling Infrastructure Plan (LWCIP) however we note that the LWCIP has not been published for consultation at the time of finalising this report. We note the request for access by active travel between the train station [in Stewartby] and the Kimberley College, however this section of Green Lane is not affected by the development. It is concluded therefore that the proposals are in line with the adopted Local Plan policies 35S, 53, 86S, as well as policies AD36 and AD39 of the Allocations and Designations Local Plan 2013.

Travel Plan

- 3.48 We note that the proposal includes an overarching Heads of Terms (HoT) for the Construction Worker Travel Plan (CWTP), as part of the OCEMP (Document 4.2.3.0). The CWTP sets out management measures for how workers will get to and from site during construction. The CWTP is expected to support and encourage sustainable travel (public transport, cycling, walking, and car-sharing) to site for employees during the construction phase (Phase 1). The measures in the document are noted alongside the proposal for the Transport Steering Group (TSG) to manage the CWTP and for each Undertaker to be responsible for its implementation, and note that Condition 5(n) specifically addresses the CWTP.
- 3.49 An overarching Travel Plan (Document 4.5.6.0) will be one of the controlling documents for the proposed development, covering construction and operation phases with measures set out to help control movements of visitors and workers (team members and employees) of the ERC. The Travel Plan aims to govern

transport activities on the site through a series of measures, including the Monitor and Manage Plan; the Wixams and the Milton Keynes shuttle buses; the Travel Plan Statement(s); and the Transport Steering Group. This is supported.

- 3.50 The implementation of the Travel Plan (Document 4.5.6.0) aims to have a range of benefits through the promotion of active and sustainable measures and the reduction of vehicles in the surrounding network. The measures will be set out in Travel Plan Statements to be submitted to the Secretary of State for approval in next planning stages, as set out in Appendices E-1 and E-2 of the Travel Plan. E-2 includes examples of potential measures and can be extended in the future when owners and/or occupiers of land within the ERC prepare their Travel Plan Statements for approval, which may accommodate suggestions for further measures made by the Transport Policy team, as applicable. The Council would also be strongly supportive of measures by HM Government to reduce the travelling costs by train between the SDO site and Bedford's town centre, promoting the uptake of this travel mode by visitors and workers at the ERC, and further boosting the spread of the projected economic growth in the area.
- 3.51 Enforceable controls in the Travel Plan (Document 4.5.6.0) are contained in paragraphs 3.14 and 3.35 and Appendices B to E-1, however we welcome the commitment for the Promoter to establish a TSG to make recommendations to the Promoter, particularly at paragraph 3.15 of the Travel Plan. We reiterate that the Travel Plan will be a controlling document part of the SDO, if made, which addresses officers' concerns in relation to the enforceability of the document.
- 3.52 Whilst satisfied with the level of detail of the Travel Plan (Document 4.5.6.0) for this planning stage, the Council recommends that the Travel Plan and/or Statements include the percentage in reduction of car use, at least for workers during construction and operation. This could effectively reduce car dependency and the 62% of workers estimated to be travelling by car to the site in the Future Year projections, in line with the Local Plan policies 87 and 88. We are supportive of officers' suggestion for the Travel Statements to not only offer mitigation for uncontrolled trips but strategic coordination of all trips, seeking to work with a site-wide Parking Management Plan as a way to effectively manage travel demand that will arise from this site. We defer comments regarding Travel Plan guidance issued by DfT to this specific department of HM Government and Active Travel England, which will be statutory consultees in this process.

Bus Services

- 3.53 The submission was reviewed by the Council's Passenger Transport and Sustainable Travel and the Schools and Specialist Transport teams, both indicating specific routes and services which would be affected both during construction and operation. Closures to Broadmead Road during construction may affect the existing services, particularly due to the existing low bridge accessing Stewartby, which impedes the use of this re-routing by the double deck buses currently in use. The Council

acknowledges that any CEMP will address these potential impacts to existing public transport within the construction traffic management provisions.

- 3.54 The Passenger Transport and Sustainable Travel team note that the local road and bus networks could benefit from local transport exchange hubs at various locations such as the Park and Ride, Bedford Interchange, Marsch Leys industrial Park, and potentially Wixams Rail station, and Bedford Bus station located in the town centre.
- 3.55 We note other points raised in relation to transport hubs and highways works to benefit public transportation in the ERC's surrounding area. Connection between Wixams and the ERC is proposed between the extended Wixams Station via a new bridge and the re-aligned Manor Road, accommodating cyclists and pedestrians.
- 3.56 Circa 2 school buses serve Fields Road in Wootton, on which, in the region of 80 children wait for school transport in the AM and alight in the PM. Therefore, increase traffic flow may increase the road safety risk to children waiting for these services. Other commissioned transport to various schools around the Bedford Borough could also be disrupted if children's homes are in the affected areas (Marston Moretaine, Stewartby, Wixams, Wootton). If roads are closed and diversion routes take longer in time/distance.
- 3.57 Suitable measures to address the issues raised can be reflected in the construction traffic management provisions within the detailed CEMPs.

Wixams Station

- 3.58 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. The Council acknowledges that the current proposal for a two-platform station serves the Wixams new settlement as intended, however, it would not have sufficient capacity to accommodate the demands of the planning proposal.
- 3.59 The proposal therefore is for this permission if granted to replace the planning permission for Wixams Station (reference 23/02629/MDC3) and the four-track, four platform option will be entirely built out pursuant to the planning proposal submission. The Council notes that 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). This is supported.
- 3.60 As such, 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 proposed development. The Council 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.

EWR Station

- 3.61 The TA (Document 4.5.1.0) notes that the development is not dependent on a new East West Rail (EWR) station at the site, however stating that applicants are strongly supportive of an extension of EWR beyond Milton Keynes. For this reason, the proposal safeguards land for a potential new Stewartby station on the EWR line between Bletchley and Bedford. The safeguarded land is secured by a parameter plan to be approved with the SDO, if made, and provisions for EWR to construct the station secured in proposed Condition 3 (Document 1.5.0). This is supported by the Council.

Chapter 6 – Ecology and Nature Conservation (Document 2.6.0)

- 3.62 Officers acknowledge that the approach to the matters of ecology, biodiversity, landscaping, and tree planting aligns with policy principles and are welcomed. The Council supports the intention to retain and enhance habitats on the site, in line with Local Plan Policy 42S. We are also supportive of the creation of a Habitat Creation and Enhancement Plan, secured by the Environmental Controls Document (Document 6.16.0), which we would expect would help the Council achieve the aims of Policy 43 of the Local Plan.
- 3.63 The site falls within Zone 4 Bedford to Milton Keynes - Marston Vale of Policy AD24 of the Allocations and Designations Plan 2013, and the Council notes the development contributing to the creation of green corridors along Ampthill Road. The landscape, tree coverage and habitat creation around brick pit and borrow pit lakes are expected to improve with the creation of the Habitat Creation and Enhancement Plan.
- 3.64 We understand there are operational constraints with the delivery of the development that preclude the retention of some existing habitat. It is our preference to retain the existing high value vegetation as much as possible on the site, and the replacement should reflect the value of the vegetation that has been removed. More details are discussed in the following Arboricultural Impact Assessment section.
- 3.65 It is noted in relation to comments from the Planning Policy team that proposed Condition 5(2)(a)(iii) (Document 1.5.0) requires details of required permits and licences required as a part of the applicable works. A Great Crested Newt Survey Report has been submitted as part of the assessment in Chapter 6 of the EIA (Document 4.6.7.0). The Environmental Controls Document (Document 6.16.0) will control the operational phase of the development if authorised, requiring that detailed Habitat Creation and Enhancement Plans are approved with the next planning stages. This is secured by proposed conditions 7, 8 and 10 (Document 1.5.0), as discussed in other sections of this report.
- 3.66 It is noted that the Environment Act 2021 exempts developments that are granted planning permission by a development order from demonstrating a minimum of 10%

of Biodiversity Net Gain (BNG). The development is not required to provide open public spaces by the adopted Local Plan and considered in line with the current Development Plan in Bedford in this regard. Landscape details are secured by proposed conditions 7, 8 and 10 (Document 1.5.0) and the description following these, and they are expected to align with the Habitat Creation and Enhancement Controls and Arboricultural Controls. This is supported.

- 3.67 We defer further assessment of the Ecology and Nature Conservation chapter (Document 2.6.0) to relevant statutory bodies such as Natural England, relevant third parties such as the Wildlife Trust, both of whom have relevant technical specialists to input. We will defer the assessment of the development against Policy 36S to the Forest of Marston Vale Trust, who are consultees in this process.

Arboricultural Impact Assessment

- 3.68 The Council notes the Tree Removal and Protection Plan and Arboricultural Impact Assessment (AIA) included in the Environmental Controls Document (Document 6.16.0), aimed at securing the ES mitigations for the operational phase of the development. The documents highlight areas of trees and hedgerows proposed to be removed to facilitate construction of the proposal and assess the quality of trees and hedgerows and the visual impact from their removal, when this is the case.
- 3.69 Officers note that the extent of visual change removal of trees adjacent to Manor Road, Woburn Road and Ampthill Road would be relatively localised, however their removal would reduce tree cover significantly, and the trees and hedgerow's collective environmental contributions. The Council's Arboricultural officer notes the proposal to remove the hedgerow running along the proposed Core Zone is classed as 'important' hedgerow under Criterion 7 of The Hedgerows Regulations 1997. In the same area, a proposal to remove an area of established woodland (G63 in the AIA), made of mature trees, dense UK native understory vegetation and large standing deadwood, making this area a high quality and valuable environmental feature.
- 3.70 The Council understands that the operational nature of the proposed development would require the removal of some of the trees and hedges, and that this also justifies replacement outside the Core Zone. We note the creation and enhancement of woodland in the Indicative Habitat Creation and Enhancement Plan and would expect that the landscape details when submitted to satisfy proposed Condition 10 will extend the woodland areas and secure the replacement of the trees and hedgerow.
- 3.71 The Council's Arboricultural officer is supportive of the proposed hedgerow species and planting formations in the Outline Habitat Creation and Enhancement Plan (Document 4.6.4.0). Officers are satisfied with the preliminary details, and the Council would welcome the suggested list of species for the woodland planting to include tree species more adaptable to changing climate conditions. Proposals for

the establishment and long-term management of landscape and ecological mitigation planting are secured by Section 1.2 of the Environmental Controls (Document 6.16.0).

- 3.72 The Council's Arboricultural officer is satisfied with the proposed tree protection measures detailed in the outline Arboricultural Method Statement (AMS) which are secured by Section 8 and Appendix D of the Environmental Controls (Document 6.16.0).
- 3.73 We note and agree with officers' comments highlighting the newly created areas of woodland would be less publicly visible, however their location is likely to benefit the ecological enhancement of the Kempston Hardwick Pit County Wildlife Site (CWS). There seems to be some inconsistency in the proposal for woodland creation in the northern-most area of the site, where the flood compensation areas are proposed (Appendix C of the Environmental Controls Document 6.16.0), and the Council expects that the detailed HCEP will address this item.
- 3.74 Considering the above comments and recommendations, we are of the view that the proposals have potential to contribute to achieving the aims of policies 35s, 37, 38 and 39 of the Bedford Borough Local Plan 2030. Comments regarding the visual impact are dealt by in the next section.

Chapter 7 – Landscape and Visual (Document 2.7.0)

- 3.75 The proposed approach to the landscape and visual impact assessment (LVIA), including the extent of the study area and viewpoints referred to in the assessment, has been discussed with the Council and is supported.
- 3.76 The Council agrees with the conclusions of the effects on landscape and visual amenity. The assessment explains that significant landscape effects are predicted to arise primarily due to construction activities associated with the tallest elements within the Core Zone during the Primary Phase of construction. This is a result of the tallest elements (ride attractions up to 115 metres and the hotel development up to 75 metres) and associated cranes (up to 10 during the peak period of construction) being visible above intervening vegetation within a predominantly flat landscape or where elevated receptors have a broader angle of views from the local ridgelines to the south and west.
- 3.77 The impact assessment highlights that the visual baseline includes elements that punctuate the horizon, including the wind turbine at Millennium Country Park (over 120 metres above ground level), the chimney at Rookery South Energy Recovery Facility (105 metres high), and retained brickwork chimneys at Stewartby (70 metres high above ground level). We agree that these structures generally only form a very small portion of the long-distance views but contribute to the visual character.
- 3.78 We note comments by the Planning Policy team regarding context and height comparisons for the proposals. These are addressed in Appendix 7.7 Landscape

Visualisations of the ES. Consideration on how extensive the effect on the proposed buildings heights is discussed in this chapter of the ES, concluding that the proposals would generate significant adverse effects on most of the relevant Landscape Character Areas (LCAs) both during construction and operation. The Council acknowledges that achieving the proposed heights is part of the operational requirements or the proposal, particularly for the theme park within the Core Zone.

- 3.79 The tallest elements in the Core Zone will align with the turbine height and to some degree those of the Rookery stacks, considering the proposed finished floor levels for the proposed development and the visualisations presented in Appendix 7.7 of the ES. We note however that 15% of the Lake Zone and 10% of the extent of the Core Zone may achieve the up to 75 metres heights and will result in a denser agglomeration of tall elements in the landscape, in comparison to the existing context.
- 3.80 Notwithstanding the above, the Council notes and welcomes that mitigation measures are embedded in the landscape for both construction and operational phases, and we suggest these are secured by the proposed Condition 5 (Construction Ecological Management Plans) (Document 1.5.0) and the Environmental Controls Document (Document 6.16.0) respectively.
- 3.81 We note Planning Policy and Arboricultural officers' comments regarding the proposals' impact on the landscape character of the countryside location. The Council acknowledges that, whilst the landscape details secured by the proposed Condition 10 (Document 1.5.0) can contribute to mitigating this aspect, the scale and nature of the proposed development will change the context of the area.
- 3.82 Currently the northern area of the site is surrounded by large industrial buildings, typical to an edge of urban area location such as the development site. In this sense, the proposed Habitat Creation and Enhancement Plan (Document 4.6.4.1.0) have potential to create the screening and enhance the setting around the remaining green areas immediately to the south of the A421.
- 3.83 The Council however acknowledges and agrees with the ES conclusion that the proposal will transform the existing landscape permanently. For the purposes of this report, we would welcome consideration by the decision maker in weighing any landscape and visual adverse impacts against the significant benefits of the proposal, as set out in the Conclusion section of this report.

Chapter 8 – Air Quality (Document 2.8.0)

- 3.84 The Air Quality Report has been reviewed along with the supporting documents referenced in the report. The report advises that the air quality assessment follows best practice guidance with due regard to associated legal requirements, Policy and Guidance. The areas being modelled are sufficient and the most relevant receptor locations have been included. 2022 has been selected as the baseline year which is

expected given the data available at the time of the report and the appropriate future years have been justified.

- 3.85 The effects of NO₂, PM₁₀ and PM_{2.5} during operation phases have been found to be negligible at all receptors for all scenarios. During construction phase for human receptors (residential premises) on Manor Road and at Kempston Hardwick Caravan Site, without mitigation there are likely to be significant adverse effects of loss of amenity due to surface soiling. However, officers are of the view that the Construction Phase mitigation measures set out in Section 3.6 of Appendix 2.3 Outline Construction Environmental Management Plan (OCEMP, Document 4.2.3.0) are appropriate, including the expectation for a Dust Management Plan to be prepared for the construction phase. We recommend that Dust Management Plan(s) are secured with the proposed Condition 5 - Construction and Environmental Management Plan (Document 1.5.0), using recycled water for dampening down. The word 'may' should be replaced by 'shall' in paragraph 5.(1) of the condition, for clarity.
- 3.86 We note comments from the Council's Commercial Regulation and Public Health teams regarding controls related to the use of pyrotechnics and the monitoring of pyrotechnic emissions. These are addressed by the Design Standards Safety and Ecology section in terms of the location and intensity of fireworks use. The Environmental Controls Document (Document 6.16.0) includes measures to control air pollution.

Chapter 9 – Noise and Vibration (Document 2.9.0)

- 3.87 The submitted information was reviewed by the Council's Community Regulations team who have raised concerns with the noise assessment included in the ES, particularly in relation to the operational phase. The team are of the view that the proposed mitigations for this phase are insufficient to demonstrate that off-site sound levels would be reduced. It is noted however that the proposal is not for a reduction, but it aims to demonstrate instead that they can be within the site noise levels set out in the Environmental Controls Document (Section 2, Document 6.16.0). The document would be part of the SDO if permission is granted for the proposed development, and therefore enforceable. Other committed developments were considered in the assessment as set out by Chapter 18 (Cumulative Effects, Document 2.18.0) of the ES.
- 3.88 Notwithstanding this, issues relating to the predicted/ committed noise levels set out for the operation of the Core Zone and Utility Compound remained and, and the Council appointed an external review of the relevant chapters of the ES assessing noise impacts. The external consultant concluded that the low frequency sound levels for entertainment noise are relatively high and could lead to disturbance and complaint, especially at night. This is consistent with and reflected in Chapter 9 of the ES (Document 2.9.0), which identifies adverse effects from noise, particularly from operation of the Core Zone. External consultants have indicated that this impact

would be likely to be perceived particularly during the up to 95 events per year, which would be allowed if permission is granted. Additionally, the proposed plant noise rating level of 10dB above background would also cause adverse effects at dwellings on Manor Road (i.e. RCL 1 only).

- 3.89 In terms of the construction noise, officers accept that activities can be inherently noisy, but impact is likely to decrease as the site moves through various phases of development. It is noted that the controls proposed by the Community Regulations team are already set out in Condition 5 of the Proposed Conditions (Document 1.5.0). Although Condition 5(2)(d) refers to best practicable means (BPM), the (i) to (v) measures are specific and will have to be detailed in the Construction and Environmental Management Plans (CEMPs) approved with future planning stages. Paragraph 5(2)(b) requires the CEMPs to detail the hours within which construction work may take place. As set out elsewhere in this report, we strongly suggest that the wording 'may' in paragraph 5(1) is replaced by 'shall', for clarity and consistency with the proposed mitigations. The external consultant has reviewed the construction noise assessment part of the ES and had no comments.
- 3.90 For clarity, the maximum daytime noise level measured at all Receptor Control Locations (RCLs) is set out at 60 decibels A-weighted equivalent (dB LAeq), which is comparable to the noise produced by a normal conversation. Night-time levels would be lower, at 50 dB LAeq at RCLs positioned in Stewartby and Wixams, and 55 dB LAeq in RCLs in other locations in the vicinity of the Core Zone. Whilst the Council would prefer to see lower noise levels particularly at night, we acknowledge that the nature of the proposed development will generate adverse noise impacts. The Council would strongly encourage the decision-maker to consider the monitoring reporting to be produced by a third-party, and for provisions to ensure unrestricted access by the Council to a noise complaints log maintained by the Promoter. We understand that although preferable, achieving 100% of compliance during the 120-day monitoring period is technically unlikely.
- 3.91 In summary and considering the suggested amendments set out in the previous paragraphs, the Council recognises that there will be an adverse impact from noise, which has been modelled. The Council agrees with the proposed noise controls and mitigation measures during the construction phase as set out in the OCEMP and secured in proposed Condition 5 (Document 1.5.0). We note the compliance and complaints procedure set out in Section 2 of the Environmental Controls Document (Document 6.16.0) and would be supportive of a decision weighing the predicted noise impacts against the significant benefits of the proposal, which MHCLG, as decision maker will need to balance in coming to a decision on the acceptability of the scheme, and on how the impact can be mitigated through the use of conditions.

- 3.92 The Council agrees with the approach taken in the chapter, which outlines a heritage assessment using a 5-kilometre study area for above-ground assets, with additional consideration of significant assets beyond this range where appropriate. For buried heritage assets, a 500-metre radius is deemed suitable due to their limited sensitivity to setting. This methodology, supported by a Desk-Based Assessment (Appendix 10.1 of the ES, Document 4.10.1.0), and the rationale for excluding certain assets, is considered acceptable. The Council agrees with the exclusions listed in Table 10-3, and overall, the scope and evidence base of the assessment are regarded as proportionate and justified.
- 3.93 The matrices used for categorising the effects of the proposed development are found in Tables 10-4, 10-5 and 10-6 of the ES are considered by officers generally acceptable, noting specific issues in the terminology used. Officers however reiterate that this does not change the conclusions reached in the assessment, other than the effect on the significance of Kempston Hardwick Scheduled Monument. This is described as having a significant adverse effect, however in the Council's view, the proposal could result in a high level of 'less than substantial harm' to the significance of the asset, considering the appreciable change in the ability to understand and appreciate the asset, both at construction and operational phases. Proposed Condition 5 part (o) (ii) (Document 1.5.0) relating to Kempston Hardwick moated site is noted and welcomed. The ideal location to monitor the impacts from piling would be on the monument itself, however the Council acknowledges that it is currently unclear whether access to the monument for this purpose can be arranged.
- 3.94 Officers agree that significant adverse effects would be also caused to the Wootton Conservation Area and eight listed buildings within; the Church Road and 3 and 5, Cranfield Road; the Stewartby Conservation Area; Sir Malcolm Stewart Trust Common Room and Sir Malcolm Stewart Trust Homes; as well as to the Elstow Conservation Area, Scheduled Monument and two grade I listed buildings within.
- 3.95 The proposed development site has been subject to comprehensive archaeological evaluation comprising desk-based research, geophysical survey, and trial trenching. The Council agrees with the mitigation areas identified through these works and with methodologies proposed for each area. Whilst we acknowledge that no site-wide archaeological watching brief will take place, officers highlight that in the unlikely event that unexpected archaeological human remains are identified outside of the mitigation areas, applicants would still be legally required to proceed with excavation over and above the mitigation work proposed.
- 3.96 The ES considers that the photographic recording of the historically important hedgerow to be removed (within the Core Zone) alongside archaeological recording reduces the impact to a minor adverse effect (not significant). The Council accepts that the operational requirements of the proposed Core Zone would not be feasible with the retention of the historically important hedgerow.

3.97 The scope and methodology for the site-based archaeological evaluation was agreed with the Council, including the Written Scheme of Investigation, in advance of the work. Officers have been on-site with the applicants' consultants, to ensure that the work was being carried out to the agreed scope and methodology as well as professional standards and are satisfied that the fieldwork was satisfactorily completed.

Chapter 11 – Ground Conditions, Soils and Agricultural Land (Document 2.11.0)

3.98 The Minerals and Waste team has reviewed the submitted information and welcomes the acknowledgment of the Oxford Clay Mineral Safeguarding Area (MSA).

3.99 Officers would welcome further information on the amount of minerals required for the development (during construction and operation), particularly sand and gravel, noting that Bedfordshire councils are required to maintain a landbank and steady supply of these minerals. This, as well as information on operational waste, would help assess future infrastructure needs and inform plan-making.

3.100 In relation to land contamination, the Council's Commercial Regulation team note that the preliminary investigation is thorough, and the technical note provides a detailed overview of existing ground investigation carried out on site to date. The team acknowledges the submission's understanding that further site investigation is required and confirm that at this stage there are no concerns or issues with the work carried and proposed approach. Officers are supportive of the approach for a detailed Land Remediation Strategy to be developed following the completion of the additional ground investigations the detailed design stage. This and other mitigations relating to land contamination are secured by Condition 5 (Document 1.5.0) and Section 4 of the Environmental Controls Document (Document 6.16.0) and are supported.

3.101 In respect of other areas covered in this chapter, the Council would like to defer comments to the Environment Agency and other relevant statutory bodies with specific technical expertise in this area.

Chapter 12 – Water Resources (Document 2.12.0)

3.102 The Council has reviewed the application in its capacity as Lead Local Flood Authority (LLFA) and has considered the impact that the development will have in terms of surface water drainage. Officers agree to the 90% level of impermeability across the site and accept that the drainage infrastructure has been sized for a 1 in 100-year probability return year period with a climate change allowance of 40%. Officers confirm that the proposed surface water drainage and sustainable drainage systems (SuDS) are acceptable.

- 3.103 The submitted documents identify the existing ordinary watercourse through the centre of the Core Zone of the site running from southeast to northwest and sets out the proposal for diverting the watercourse along the eastern boundary of the site. The watercourse will be designed to requirements of the Bedford Group of Internal Drainage Boards and will include a 10 metres riparian protection zone set back from the top of bank. This will enable the Core Zone draining to the diverted watercourse which will discharge into the Kempston Hardwick Clay Pits artificial lake in the Lake Zone.
- 3.104 The information provided describes the drainage strategy, which will split the site area into 3 drainage catchments: the Core and Lake Zones; the West Gateway Zone; and the East Gateway Zone. The Lake Zone strategic attenuation will be a wetland with a permanent level of water, attenuation volume for the Core and Lake Zones and adequate storage for water harvesting on site. Surface water run-off will be conveyed through multiple levels of treatment and stored in the pits. The Lake Zone discharge will be pumped to the Utility Compound in the southern part of the Lake Zone where the water is either processed for reuse within the development or discharged to the Kempston Hardwick Clay Pits artificial lake (in the Lake Zone) or Elstow Brook at a discharge rate not exceeding greenfield run off rate.
- 3.105 The West Gateway Zone surface water run-off will be stored in attenuation basins and then discharge to the Elstow Brook at the greenfield run-off rate. Where the proposed road crosses the Elstow Brook a clear span bridge structure with a raised soffit level will be built at a suitable level to avoid future flooding issues at this location. The East Gateway Zone surface water run-off will also be initially stored in attenuation basins. The discharge will be at the greenfield run-off rate to nearby ordinary watercourse located south of the East Gateway Zone, and subsequent draining via gravity to Harrowden Brook.
- 3.106 Notwithstanding that the Council is the Lead Local Flood Authority for the proposed development, other matters will be deferred to consultation with the Bedfordshire and River Ivel Internal Drainage Board (IDB), as the proposals lie within their drainage area. The other matters include works to watercourses and the proposed water discharge rates, which will need to be agreed with the IDB.
- 3.107 We note Planning Policy team's comments suggesting that green and blue infrastructure is referred to in proposed Condition 10(iii), however the existing and diverted water features and the existing and proposed green infrastructure are part of the Habitat Creation and Enhancement Controls and Arboricultural Controls cited in the proposed condition wording.

Chapter 13 – Socio-Economics (Document 2.13.0)

- 3.108 The Council notes the commitment to apprenticeships, internships and support for 'high risk' and socio-economically disadvantaged populations. We strongly support

the commitment to engage with local students within the Core Study Area (CSA, or the combined local authority boundaries of Bedford and Central Bedfordshire); the prioritising of local students in the hiring process, in terms of Construction Skills and Training; and the focus on apprenticeships and training schemes and priority access to employment opportunities for local residents.

- 3.109 It is estimated that the Core Zone will employ 8,065 people in 2030, and will have 12,475 direct employees by 2050, and that a large share of the jobs on offer at the Core Zone will have low entry requirements. The Council supports the Promoter's intention to upskill Bedford communities, increasing opportunities for progression and development, for those hired under low paid roles and looks forward to working with the Promoter to implement the commitments in the Employment and Skills Plan (Document 6.12.0), as applicable.
- 3.110 We will defer suggested measures regarding the local health care sector to the respective National Health Service (NHS) Integrated Care Board (ICB) who are also statutory consultee in this process.

Temporary Workforce Accommodation Strategy

- 3.111 The submission includes a Temporary Workforce Accommodation Strategy (Document 4.13.1.0), proposed to mitigate the temporary effects on accommodation, as set out in Chapter 13 of the ES (Document 2.13.0). The Strategy considers whether any mitigation in the form of a temporary workforce accommodation campus at the site may be required to accommodate workers during the construction of the proposed development. This is strongly supported.
- 3.112 The Council notes the information submitted as part of the Strategy, including the applicants' anticipated scales of impact on local accommodation, focusing on the peak construction workforce in the Primary Phase. The strategy also includes a comparative analysis of the accommodation requirements from other significant developments in the region. Officers note that the potential peak of non-home-based workforce requirement is estimated, and compared to the available, affordable and appropriate accommodation options. The Strategy points out that 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.
- 3.113 Based on the applicants' experience on the construction of other similar theme parks, the Primary Phase peak construction workforce count on site is estimated to be of 5,380 workers and is expected to occur in winter 2029. An assessment of the potential for cumulative schemes to also place demands on workforce estimates that between 3,985 to 4,495 further construction workers will be required for other schemes not related to the proposed development.

- 3.114 According to the analysis, of the peak construction headcount for the proposed development, approximately 855 workers would be non-UK based employees who will require temporary accommodation during their time in employment. Of the remaining workforce who are expected to be domestic workers, it is estimated that between 225 and 680 might require temporary accommodation, totalling 1,535 workers with this demand during peak construction of Phase 1.
- 3.115 To address this, a Temporary Workforce Accommodation mechanism is secured by proposed Condition 6 (Document 1.5.0), requiring the Promoter to prepare Quarterly Accommodation Report(s) from the first month following the earthworks and grading phase of construction (estimated Autumn 2027). The Quarterly Accommodation Report(s) would be shared with the Socio-Economic Taskforce which is expected to be established to hold quarterly meetings, involving Bedford Borough Council, Central Bedfordshire Council, the applicants, and potentially, MHCLG. The establishment of the Taskforce is secured by the Environmental Controls document (Document 6.16.0).
- 3.116 The Accommodation Report will serve to determine whether 535 or more serviced accommodation rooms within Bedford and Central Bedfordshire (CSA) are being used by construction works in the authorised development. If the threshold is exceeded, an Action Plan must be prepared for discussion with the Taskforce, and in the event of exceedance in the subsequent two Quarterly Reports, a Temporary Accommodation Facility will be provided on or off-site by the developer. The monitoring strategy and establishment of the Taskforce including the Council is supported.
- 3.117 We note that Condition 6 (Document 1.5.0) sets out that an Action Plan is expected to be submitted to the Socio-Economic Taskforce within two months of the Quarterly Accommodation Report that identifies the exceedance. In the event a Temporary Workforce Accommodation Facility is required then the period for submission of such Accommodation Action Plan shall be 6 months. Officers note that identifying that the accommodation need is exceeded, a further 6 months for the action plan submission, and then the timescale for any identified actions to be put in place that we would likely be looking at 12 months or longer to see any of these actions implemented.
- 3.118 To avoid this scenario, we strongly suggest that the frequency for monitoring is increased to bi-monthly (every two months) reporting to the Taskforce, and that the timescales in Condition 6 (Document 1.5.0) are reduced. We suggest that the 'at least' expression relating to the Accommodation Quarterly Monitoring Period description is removed, for clarity and certainty. More importantly, we strongly suggest that the condition wording is specific in identifying the Promoter(s) as solely responsible for providing, managing and maintaining the temporary workforce accommodation, if deemed necessary on or off- site.
- 3.119 We would also welcome anonymised information about the longevity of contracts that workers will have during construction, i.e. fixed-term, permanent etc, to enable

consideration of affordability for accommodation should employment cease. This would help avoid/ preparation for situations that could place additional strain on existing pressure housing and broader services. The information could be part of the Quarterly Reports scope.

- 3.120 The Council's Housing team would welcome the inclusion of analysis of possible impacts on affordability within the local market in any Action Plan that is required pursuant to the Temporary Workforce Accommodation Strategy, both across serviced and non-serviced accommodation, suggesting the applicants to also assess property availability in neighbouring counties north of the Borough. Officers note this area has not currently been included in the CSA or the SRCA and would provide additional supplies of rental properties/serviced accommodation to support the workforce accommodation strategy.
- 3.121 The suggested analysis of affordability across serviced and non-serviced accommodation and the potential impact of this employment profile on local accommodation/ housing should be coordinated with any wider assessment done by the Council, to enable input in any future plan-making initiative by the Council. This could lead to more focused, effective mitigation measures within any Action Plan as well as those in Chapter 17 – Population and Human Health (Document 2.17.0), and it would address Local Plan policies 2S, 3S and 33, whilst enabling specific actions to be implemented in collaboration with the Council in the future.
- 3.122 We note and welcome the requirement in Condition 6(6) (Document 1.5.0) to ensure that any building 18 or more metres in height or which contains 7 or more storeys is required to have a fire statement before such building is occupied. It would be suggested that also any building falling into the definition of a House in Multiple Occupation (HMO) used for accommodation also be in possession of a valid HMO license, issued by the local authority. This ensures that the accommodation meets minimum safety and amenity standards.

Chapter 14 – Greenhouse Gases (Document 2.14.0)

- 3.123 The Council recognises the opportunities for renewable sources of energy on this site, which could help achieve the applicant's aims for contributing to the UK trajectory to 'net zero', and to achieve energy efficiency requirements of the Building Regulations approved document L (Volume 2), which supersedes the Local Plan Policy 54. The Council would like to note the site's location within area of potential for solar energy development as pointed out by Policy 56 of the Local Plan in Bedford.

Chapter 15 – Climate Resilience (Document 2.15.0)

- 3.124 Considering Local Plan Policy 51S and the Council's Climate Change and Pollution SPD (2008), we would expect a strategic approach to climate resilience during construction. Applicants are suggested to conduct thorough risk assessments of their supply chains, particularly in high-risk areas, and consider supply chain insurance to

mitigate potential disruptions due to climate change and adverse weather.

Assessments are suggested to consider planning [construction] phases according to seasonal limitations such as extreme heat or storms/high rainfall.

3.125 In relation to the Carbon Management Plan, we note the HM Government (DCMS) letter Appended to the Planning Statement (Annex 10), encouraging the applicant to work with Government as the applicants further develop the Plan, to ensure its compliance with any new policies and minimise any emissions impact. We note the Environmental Controls Document (Document 6.16.0) securing water conservation and carbon management controls and support these measures.

3.126 We note the commitment in the Environmental Controls Document (Document 6.16.0) to achieving Leadership in Energy and Environmental Design (LEED) Gold certification under the U.S. Green Building Council's for Communities (USGBC) Plan and Design rating system for the design of the ERC, secured in the Environmental Controls Document. We are supportive of the proposal for flagship buildings (first building of the restaurant; retail venue; office or administration facility; server centre; warehouse or storage facility; and hotel categories) within the ERC to achieve LEED Gold certification under the USGBC's LEED for Building Design and Construction.

Chapter 16 – Major Accidents and Disasters (Document 2.16.0)

3.127 We note that disease epidemics have been scoped out of the ES on grounds that mitigation would be put in place by the occupational health and safety processes that are implemented by both the Undertaker, alongside HM Government rules and guidelines for the spread and control of COVID-19. The assessment also indicates that the construction and use of the proposed development will not give rise to any disease epidemics, and that the Undertaker's Emergency Management Plan includes protocols for infectious disease. We consider that the response to and management of health protection and infectious disease situations more broadly should be considered, as set out in the next section.

Chapter 17 – Population and Human Health (Document 2.17.0)

3.128 We note the inclusion of the topic in the ES, addressing the Local Plan Policy 2S requirement for health impact assessment of major developments. Given the scale of the anticipated economic benefits and the plans to recruit most of the workforce from Bedford Borough and the neighbouring local authorities, we consider the overall likely impact of the development to be of net benefit to the health of people living and working in the area. There is however a risk of impacts for specific geographic areas or population groups that require consideration and mitigations. Additionally, we see that there are opportunities to maximise the benefits to population health and promote health equity. In this regard, we welcome the pre-engagement with the local Gypsy and Traveller community, and the recognition of this group as disproportionately represented in the local area.

- 3.129 The Proposed Conditions set out in Condition 5(p) (Document 1.5.0) requirements in relation to population health during construction, regarding: access to emergency vehicles; a code of conduct for construction workers; details of initial first aid treatment services; and coordination with the local health care providers. This is noted and the following comments provide a broader perspective and approach to mitigations and for maximising the potential health benefits. The Council agrees with the ES conclusion that the capacity of local health system, and particularly the capacity of primary care, are constrained. The proposal that the applicants will liaise with the health care system is welcomed and we expect that this is taken further to the local Integrated Care Board (ICB) and HM Government to allocate appropriate levels of funding, if required.
- 3.130 We recommend that health protection measures are also considered in Condition 5 (Document 1.5.0), for example regarding the potential for infectious disease outbreaks among the workforce or among visitors; and any mitigations relating to contaminated land, if at any stage this is identified as a potential hazard. We strongly advise that the applicants liaise with the Council's Public Health team, the UK Health Security Agency and the local ICB to develop and agree coordinated infectious disease notification and management protocols, with such protocols to be in place prior to the theme park opening.
- 3.131 To enable workers in the construction and operational phases to have a healthy and affordable diet, consideration should be given to provision of healthy, affordable food options, and facilities to store and prepare a range of foods, including perishable food. We would encourage the applicants to adopt a healthier catering commitment for workers and visitors equivalent to the London scheme (please see more information on <https://healthiercateringcommitment.co.uk/>). Furthermore, we would welcome a commitment that all food outlets with tables and seating offer healthy menu choices, and that a range of healthy snack choices are available throughout the park. These recommendations are in line with the aims of Policy 2S of the Local Plan 2030. We will defer assessment against Paragraph 97 of the NPPF to the decision-maker.
- 3.132 The Council has identified the following operation related climate change-related public health impacts that it would like the Promoter to consider in its detailed design, including in relation to heat and dehydration, such as free, easily accessible potable water throughout the park, including provision in all food outlet and picnic areas; with encouragement for workers and visitors to bring their own water bottles. This would also improve the availability of healthy, affordable drinks for workers and visitors. In addition to this we seek inclusion of easily accessible areas of shaded seating throughout the park to reduce the risks of exhaustion, dehydration, overheating and excessive exposure to ultraviolet radiation.

- 3.133 The Council has identified the following operation related items that it would like the Promoter to consider in its detailed design that respond to potential inequities for the proportion of the population who have hyper-noise sensitivity (e.g. associated with neurodivergent status such as autism), or the proportion of the population who have special needs in relation to exposure to crowded environments, or toileting such as the provision of designated quiet zones throughout the park, priority access (e.g. early entry or fast-track passes) for children and adults with SEND and their carers, and adequate provision of changing places and disabled toilets.
- 3.134 The Council has identified the following operation related items that it would like the Promoter to consider in implementation of its Security and Emergency Management Plan to safeguard children during the operation of the park, notably for vulnerable children and young adults in local authority care or those supported by social services. The publicly accessible areas of the site are places where such individuals would be likely to congregate, including when they go missing from their carers. Such locations are associated with elevated risks of unaccompanied individuals targeted for exploitation. We suggest that the Promoter work with the local Children's Services directorates to develop and agree coordinated prevention, notification, management, and monitoring protocols, with such protocols to be in place prior to the theme park opening.
- 3.135 In line with the known and considerable harms of tobacco smoking, and the Government's ambitions for a smoke-free UK, we seek smoking and vaping be restricted to designated areas away from children and young people.
- 3.136 We note the local community can benefit from the presence of the park, and we would seek to collaborate with the Applicant to further this community benefit.
- 3.137 The Council acknowledges that hosting a project of this nature has benefits for the local community and it also has potential to significantly change community identity. Not all members of the community will benefit equally from the presence of the theme park, and some may be disadvantaged as local housing and employment markets change. In this sense, we welcome the applicants' commitment to establishing a range of programmes to help shape the future of local communities.
- 3.138 Officers have confirmed that the Promoter will establishing a community social responsibility strategy which would support initiatives developed in collaboration with local communities and which address local need, for example as identified in the Joint Strategic Needs Assessment and Joint Local Health and Wellbeing Strategy. The specifics of the commitment could be developed in collaboration with the Council and local fund givers.
- 3.139 We note officers' recommendation that any permission secures a Monitoring Plan, however the Council understands that the application addresses all foreseeable impacts and mitigations at the time of its consideration. The Council supports the

early establishment of a Socio-Economic Taskforce, and consideration that it incorporates the suggested topics above. Aspects relating to accommodation are considered with the assessment of the Temporary Workforce Accommodation Strategy (Document 4.13.1.0), in the Socio-Economic section of this report.

Chapter 18 – Cumulative Development (Document 2.18.0)

3.140 The approach to identifying potential Committed Developments to undertake an assessment of the cumulative effects of the proposed development, both in terms of scale of development and distance from the site boundary, was agreed with the Council and is supported.

DESIGN STANDARDS (Document 6.3.0)

3.141 The Council supports the proposed flexibility allowing for articulation of the scale and massing of the buildings, acknowledging that the approach is justified by the operational nature of the development. The Open Sky Articulated Skyline standard and related parameters have the potential to create an attractive element in the skyline, without appearing to be excessively bulky and monotonous in the wider open landscape that surrounds the site.

3.142 The general parameters for maximum heights are broadly well distributed across the site, considering environmental aspects to the north of Manor Road (Lake Zone) and sensitive receptors at the immediately adjacent residential areas. The Design Standards document establishes that most of the land area within the Core Zone (at least 70%) and the Lake Zone (at least 60%) will comprise Low Components (up to 10 metres high), with Tall Components (up to 75 metres high) allowed in 10% and 15% of the land area in the respective zones. Maximum Height structures (up to 115 metres high) would only be allowed in the Core Zone and in only 3% of the Zone area.

3.143 The Council notes the proposed variety of building heights and percentages applied to each zone, and the understanding that boundary landscape and greenery are key to softening articulated skyline impacts. Notwithstanding the proposed heights articulation and impact mitigations, the Council acknowledges the potential for significant effects and accepts that the proposed heights are part of the operational requirements of the development, as discussed previously in this report.

3.144 Table MH01 proposes that fences and any integral gates to all zones in the ERC may achieve 5.4 metres in height. The Council accepts that this is justified by the operational security requirements of the theme park area and would be supportive of the proposed Condition 8 (or 10) (Document 1.5.0) to include details for landscaping, demonstrating that the visual impact from the fences and gates are minimized. We would suggest that the maximum height applied to non-ticketed areas in the Core Zone and to other zones in the ERC are reduced to no more than 2.5 metres, and

that articulation of the fence lines and heights are secured, alongside landscaping to minimise visual impacts from those elements.

- 3.145 We are supportive of the proposed floorspace limitations in Section 3 of the document, particularly the limit to individual retail unit size in the Lake and West Gateway zones to up to 1,100 square metres in gross external area (GEA), which will also help with mass articulation of any proposed buildings. It is our understanding that this document will apply in conjunction with the Land Use Limitations Table, which is supported. We also welcome the Land Use Limitations Table securing Vertical Sky Component Assessments (VSCAs) are carried out in relation to elements within the Core Zone, to secure adequate levels of daylight and sunlight to dwellings along Broadmead Road and Manor Road, while these remain in residential use.
- 3.146 The Council is supportive of the proposed conditions securing that the Design Standards (Document 6.3.0) are applied to the detailed stages of the development, and that detailed design for external appearance, means of access, landscaping, layout, lighting, drainage and scale are secured by the proposed Condition 10 (Document 1.5.0). We would be supportive of the wording 'may' be replaced by 'shall' in the heading of the condition.
- 3.147 We are also supportive of the proposed Condition 9 (Document 1.5.0) to secure details for buildings or structures over 45 metres height located outside the Core Zone. We suggest that 'may' is replaced by 'shall' in the heading of Condition 8 (Document 1.5.0), for clarity and to ensure that the details are approved by the Secretary of State, avoiding issues related with light and glare pollution and unacceptable impact on residential amenities and highways safety.
- 3.148 The Council is supportive of proposed Condition 7 (Document 1.5.0) to secure non-Core Zone Design Standards and Masterplans, and we would be grateful if the Council is consulted in the process, particularly as the other zones would include roads to be adopted by the Council. We would be supportive if the term 'may' be replaced by 'shall' in the heading(s) of the condition.
- 3.149 The approach described in the previous paragraphs would address comments made by the Planning Policy team in relation to sustainable design to address climate resilience. Sustainable Construction aspects of the proposal are addressed in the submission and mitigations included in proposed Condition 5 (Document 1.5.0), as discussed in the relevant section of this report. Detailed Lighting and Landscaping considerations will be considered as part of details to satisfy conditions 7, 8, 9 and 10 (Document 1.5.0), as discussed above.
- 3.150 Other comments relating to the submitted Design and Access Statement are noted however this is a supporting document, not for approval at this stage, as set out in the Guide to the Planning Proposal (Document 1.4.0). Detailed design secured by conditions 7, 8, 9 and 10 (Document 1.5.0) if approved will enable the assessment of

the design aspects raised by the Planning Policy team. This addresses officers' comments regarding post-decision approval process for future design documents. Site connectivity and active travel are secured by proposed Parameter Plans (documents 1.10.0 to 1.15.0) and the Travel Plan (Document 4.5.6.0), as discussed in the Transport section of this report.

- 3.151 The Council will defer other comments on surface water, flood risk and drainage to the Internal Drainage Board and Environment Agency, as applicable. The Council will also defer comments on the standards relating to safety to the Health and Safety Executive (HSE) and would expect further assessment of the ecological standards by the relevant statutory bodies and MHCLG.
- 3.152 Other aspects of the Design Standards (Document 6.3.0) relating to sustainability, access, and operational standards will be assessed in relation to the impacts covered by the ES and other framework documents submitted for approval, which are discussed in other sections of this report.

PLANNING STATEMENT (Document 6.1.0)

Development Plan and Planning Compliance

- 3.153 The Council is also of the view that a development of this scale and potential spatial, social and economic transformation to the Bedford Borough area such as the proposed could not have been envisaged when the current planning policy framework was prepared. If planning permission is granted, the authorised development will need to be considered in the preparation of any new Local Plan coming forward.
- 3.154 The Promoter supports the Council in planning adequately and proportionately to the scale of change and will share information regarding projected needs for housing and employment land for the operational phases of the ERC with the Council.
- 3.155 Further to the above, the applicants will support the Council in monitoring the demand and supply for permanent residential accommodation within Bedford and the wider area in similar manner to that within proposed Condition 6 (Document 1.5.0). This will be necessary to help inform the new Local Plan and accommodation needs arising from the proposal. 3.172 The Planning Policy team highlighted other documents in preparation, including the Minerals and Waste Local Plan, which is discussed in the section of this report covering Chapter 11 – Ground Conditions, Soils and Agricultural Land (Document 2.11.0).

Retail Impact and Sequential Test

- 3.156 The Council acknowledges that the ERC could not be located within the town centre and that the proposed site is close and with good linkages proposed to the town centre of Bedford. However, there are uses proposed within the complex which would potentially directly compete with town centre uses such as food outlets and retail premises. Officers are of the view that it is reasonable to assume that most

visitors to the ERC will not be leaving the resort to seek the on-site uses as they are complementary to the visitor experience. The Council therefore agrees that compliance with the sequential test is therefore considered for the proposed ERC as a single development.

- 3.157 The applicants have worked with the Council to determine whether a town centre site would be suitable, if one was available. This was considered, notwithstanding that no sites met the minimum size requirement, and that a town centre site would likely result in unacceptable impacts in terms of accommodating the volume of visitors anticipated. Instead, the option was for a site which had good links and access to the town centre, whilst being geographically separate from it. No town centre or edge of centre sites were identified that were suitable and available to meet the need for the entertainment complex and therefore it is agreed that the sequential test is passed.
- 3.158 The Planning Statement concludes that the proposed development would provide a new source of expenditure for local businesses, increasing existing retail turnover, including for Bedford's town centre. The projected increase in visitor spending is greater than all current primary resident spending, which is concluded unlikely to be fully withdrawn from Bedford's town. Therefore, even in the worst-case scenario, businesses in Bedford town centre can expect to benefit from the trade creation associated with the proposed development, even if there may exist some trade diversion for primary residents.
- 3.159 Notwithstanding the above, the Council welcomes the controls in the proposal to ensure that retail uses within the ERC are solely those in relation and complementary to the resort.

EQUALITIES INFORMATION REPORT (Document 6.6.0)

- 3.160 The Equalities Information Report (Document 6.6.0) accurately describes the populations with protected characteristics in the local area and other relevant geographic areas. The Council is satisfied with the quality of the research used to understand the impact the development would have on communities with different protected characteristics. The literature review summarises the likelihood of disproportionate or differential effects, and the Council agrees with the potential impacts and considerations identified in Chapter 5 of the report.
- 3.161 Broader barriers to inclusion, such as language, digital access, and workplace culture, could have more emphasis. Recognising non-traditional skills and embedding inclusive recruitment practices will support equitable employment outcomes.

SECURITY AND EMERGENCY MANAGEMENT PLAN (Document 6.4.0)

- 3.162 Substantial parts of the document have been redacted and therefore the Council was not able to review the document for comments. We assume that the decision maker

will be satisfied with the details in the unredacted plans and have consulted with Bedfordshire Police and Regional Counter Terrorism units as required.

SUSTAINABILITY STATEMENT (Document 6.8.0)

- 3.163 Comments have been added in other parts of this report, particularly under Chapter 15 – Climate Resilience and Design Standards sections.

ENERGY STATEMENT (Document 6.9.0)

- 3.164 The Council suggests that the Promoter consider solar energy for its power requirements for the site in general, not only heating requirements. Other renewable sources should be considered, as discussed previously, and given they should be key in not only reducing the requirement for power on the grid but also reducing the operational costs of the site going forward.

EMPLOYMENT AND SKILLS PLAN (Document 6.12.0)

- 3.165 The Council notes the submission of the Employment and Skills Plan presenting a similar context as in the Council's 'Skills Led Recovery Plan' and the Local Skills and Improvement Plan. The Plan gives a clear statement of intent and measures to track progress contained in their three key strategic aims of "Improving educational outcomes locally", "Enhancing employability" and "Promoting inclusivity and equity".
- 3.166 The Council acknowledges the applicant's portfolio of existing and previous initiatives ranging from in-house development programmes to Education Centres. We note the applicant's approach of using this track record to deliver similar initiatives in Bedford and with a focus on locally identified needs and issues in respect of their three key objectives. The initiatives would be innovative and welcomed by the Bedford's Careers hub. They could also potentially benefit those in the 16-24 age group where the rate of employment seekers in Bedford is higher than all geographical comparators.
- 3.167 The Council notes the Employment and Skills Commitments outlined in Table 7-1 of the Environmental Controls document (Document 6.16.0), and the proposal to establish a Socio-Economic Taskforce, which would include Bedford Borough Council. We agree for the details of the implementation approach for the commitments to be developed on an ongoing basis, as new information and advice is received from engagement with local authorities and other stakeholders via the Taskforce.
- 3.168 We suggest the Socio-Economic Taskforce is established as soon as the SDO is/ if made, to ensure that the prompt detailing of the commitments will benefit residents in Bedford from employment and training opportunities for all phases of construction and operation. The Council's Jobs & Skills team suggest that when establishing the Taskforce, existing local governance arrangements are considered to avoid duplication of effort and time.

- 3.169 Details regarding the growing number of apprenticeships supported solely by the applicants or in conjunction with Bedford College would help ensuring that aspirations do not fall short of targets. We would welcome in the detailing phase clarity regarding any support to Bedford College as part of the community initiatives to provide more vocational courses to upskill the future workforce for the growing number of roles being created.
- 3.170 The Council's Education team would welcome further clarification about the support for high-risk or socio-economically disadvantaged students and how "high-risk" students are being defined. In line with the proposals, the team suggest that supported internships are offered for the Council's Special Education Needs and Disabilities (SEND) cohort alongside the paid internships and apprenticeships, facilitating the future workforce with required skills. Outreach with local schools via providing talks, career guidance and hands-on experience in creative departments, providing mentorship and educational support to under-resourced schools located near the theme park are strongly supported to the local area, as would be Science, Technology, Engineering, Arts, and Mathematics (STEAM) events and field trips and working with Enterprise Advisors.
- 3.171 The Public Health team also suggests that the detailing of training and employment opportunities are focused on local population groups who experience barriers to employment, to maximise the health benefits of good quality stable employment in a way that reduces local health inequalities. This includes include young adults with SEND, those who are Care Experienced and those who are Not in Education, Employment or Training (NEET).
- 3.172 The Council would seek to work with the applicant to maximise the training and employment opportunities for adults facing barriers to employment, via the Council's Jobs Hub and local Supported Employment and Individual Placement Support schemes. Monitoring of the uptake of training and employment opportunities by key population groups would enable the impacts to be measured and allow further tailor the targeting of local groups. This information could be shared with the Council via the Socio-Economic Taskforce to support collaboration.

4.0 CONCLUSION

- 4.1 The Council is supportive of the proposed development, considering the significant benefits to the local area, and contribution to the local, regional and national economy. The agglomeration opportunity from the investment will enable current fledgling industries such as the visitor economy, service industry, creative sector, advanced engineering and digital sectors to prosper. This will create new jobs at various levels, in professions both skilled and entry level workers wish to access, retaining talent, sharing wealth creation, diversifying and building sector spread and resilience in the local economy.

- 4.2 The Council agrees that it is inevitable that a transformative development of this scale will have both positive and some adverse impacts and trusts that the decision maker will balance the public benefits against the residual impacts from development, in a manner that provides sufficient mitigation. We recognise and welcome the applicants embedding in the proposed development the mitigations required against potential adverse effects. Notwithstanding this initiative, the proposals would still produce impacts during construction and operation, most of which would have a moderate adverse effect. The Council agrees that some of the impact during operation affecting landscape and visual amenity, noise and vibration, cultural heritage and archaeology, as well as the amenity of non-motorised users during construction would be of major nature.
- 4.3 The Council recognises that this is a project of national importance to the UK economy, and is supportive of the benefits that this will bring. However, there are potentially valid concerns being raised by our communities, and our councillors as their representatives, that the potential adverse impacts from the development need to be sufficiently mitigated as discussed above. The Council recognises that the technical information contained within the application documents sets out these proposed mitigations (to be controlled by conditions). The Council respectfully requests that there is sufficient safeguarding in place in order that mitigation is secured by MHCLG. Universal Destinations & Experiences and Bedford Borough Council have committed, during construction and operation to continue to work together to address impacts on the local transport network and local housing supply through the proposed steering groups, Travel Plan, Travel Statements and Action Plans that are secured in the conditions and controlling documents.
- 4.4 If granted permission, however, the development will deliver improvements to the local transport infrastructure and other transformative, positive impacts. Benefits arising from the proposal include significant beneficial effects during operation for non-motorised users with the pedestrian and cyclist facilities provided, for the Kempston Hardwick Pit CWS, arising from proposed habitat modification and enhancement measures. These will also have beneficial effects on the diverted watercourse in the Core Zone which will in turn reduce on and off-site flood risk by increased capacity. Ultimately, the proposal would make efficient use of the land, providing high quality development on previously developed land that has been identified for future growth, at the same time partially replacing brownfield and intensively farmed agricultural fields for additional landscape and tree planting.
- 4.5 Positive effects are also predicted for the socio-economic area, due to the employment opportunities on offer for construction and operation phases. The effect on businesses in Bedford with respect to trade creation and economic output are also expected to be major beneficial effects deriving from the proposed development during the operation of the ERC, alongside the direct, indirect and induced employment opportunities created.

- 4.6 The Council welcomes the pro-active and inclusive way the applicant has sought to engage both with the Council, and with the wider community and stakeholders in the pre-application stage of this project. This approach has successfully built-up trust in the local community, and the Council notes the overwhelming positivity towards the project that has been evident in stakeholder engagement that has taken place throughout 2024 and 2025.
- 4.7 The Council is committed to collaborate with UDX and HM Government, to collectively address any construction and operational impacts as they arise and to jointly promote local employment opportunities.
- 4.8 Looking ahead, if permission is granted, the Council would like to remain involved to ensure co-ordination with local matters and for input of local knowledge.

28th August 2025

