



The countryside charity
Bedfordshire

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**MHCLG Consultation on a request for planning permission for an
Entertainment Resort Complex and associated development at the former
Brickworks and adjoining land, Kempston Hardwick Bedford**

Introduction

1. CPRE Bedfordshire is pleased to take the opportunity to contribute comments to the MHCLG consultation on the request for planning permission for an Entertainment Resort Complex at the former Kempston Hardwick Brickworks, Bedford, put forward by Universal Destinations & Experiences (UDX).
2. We have reviewed the documentation supporting the request and have focussed most of our attention on the sections of the Environmental Impact Statement (EIS) concerned with impacts on landscape, ecology, and noise. In addition, we are particularly concerned about the additional demand the project will place on water resources. We are looking to be reassured that these demands, both on site and from associated independent development that will inevitably follow from a development of this kind, can be realistically managed and delivered.
3. We recognise that the material presented for the EIS has been generated in a thorough and professional manner and provides a useful analysis of the environmental issues associated with the project. In general, the negative impacts appear to have been identified accurately, and the proposed mitigation measures well designed to keep adverse impacts to a minimum, as long as these measures are implemented effectively and maintained for the long term.

Landscape and Visual Amenity

4. The proposed location for the theme park is on the historic site of Bedford's Stewartby brickworks, once the largest in the world. The brickworks played a significant part in Bedfordshire's industrial history, shaping its multi-cultural society as well as leaving lasting negative impacts on the landscape. Although the brickworks achieved iconic status, bringing economic wealth and employment to the county, brickmaking generated a significant source of pollution with 32 chimneys each standing 70 metres tall at Stewartby. The chimneys were imposing industrial landmarks on an otherwise rural landscape.
5. The impact of the theme park in its final built form on the surrounding landscape will be dictated to a great extent by the height of the buildings on the park. These are specified in the Design Standards tables which show the range of maximum heights for various types of building to be as high as 70m to more than 100m in some areas. The visual impact of buildings as high as this can be imagined from memories and photographs of the brickwork chimneys. The overall impact of such a large group of very high buildings over an extended area of land will inevitably be considerable. The park will create an imposing presence which will be visible for miles around and particularly from higher ground such as at Ampthill Park and from the Greensand Ridge.
6. The key approach put forward by UDX as a way of mitigating the visual impact is to adopt an 'Open Sky Concept Articulated Skyline standard, which will comprise differentiating buildings heights, a varied architectural style, spacing and setbacks which will break up the mass of the buildings to create a varied skyline.' In the event that permission for the proposed development is granted, it must be hoped that UDX will apply their experience from their other projects, some of which are located in sensitive environments, to mitigate adverse impacts and deliver significant positive features.
7. Another set of key measures designed to soften the impact of the park on the surrounding countryside include early 'implementation of landscape proposals, tree planting, use of mitigation planting or alternative visual screening, retaining vegetation at certain locations, long term management of planting including weed control, grassland/hedgerow maintenance and woodland management.'
8. CPRE Bedfordshire consider these measures, as well as other mitigation measures referred to below aimed at conserving and enhancing the ecology of the site, are crucial to the success of the project. Whilst the main purpose of the theme park may be principally to create a world class leisure attraction that has the potential to bring substantial economic benefits to the area, it also has the potential to generate benefits for nature and the environment that go beyond the ambitions of other types of commercial development likely to be delivered locally.

Ecology and Nature

9. Since the brickworks finally closed in 2008 large areas of the site have been developed for nature through the Forest of Marston Vale and County Wildlife sites, providing an extensive range of habitats and water bodies.

10. Development can bring threats to ecology and nature if not delivered carefully and with good intentions. Alternatively, with a positive approach, development can provide great opportunities, especially to an area of land that has suffered degradation due to extensive industrial activity over a long period of time.
11. We are pleased to see that the approach taken by UDX highlights landscaping and greening as playing an important part in how they design and create their theme parks. The commitment to 'plant thousands of trees and create green, natural buffers around the site of the park to both enhance biodiversity and shield local communities' is welcomed. It is good to see that UDX are engaging with the team at the Forest of Marston Vale about how the proposal can contribute to their policy goals, including environmentally led regeneration of the Forest of Marston Vale and potentially increasing tree coverage across the site.
12. However, we note with concern the Bedford Borough Council Arboricultural Officer report which refers to the proposal to remove a number of large, established and higher quality trees such as those adjacent to Manor Road, Woburn Road and Ampthill Road. The report highlights that these mature trees are seen to make "positive contributions to the verdant and rural character and appearance of the area."
13. It will be important to ensure that any loss of mature trees, where unavoidable, is kept to an absolute minimum.
14. Key mitigation control measures put forward in the EIS that are particularly important to deliver effectively for ecology and nature include;
 - Retention and creation of a minimum of 49.3ha of habitats including within Ecological Enhancement Areas (EEAs) across the Site;
 - Establishing protected zones for ecology during construction;
 - Obtaining protected species licences including a District Level Licence (DLL) for great crested newts and site specific licences from Natural England for bats and badger including mitigation measures for these species.
15. It is of the utmost importance to see that measures to mitigate for visitor presence in the park in the delivery stage are effective in reducing disturbance to sensitive habitats, such as reedbeds and nesting islands, and that priority species are adequately protected. It would be helpful to see UDX working with the local authority and wildlife groups to enhance nature and ecology on the site including protecting the County Wildlife Sites nearby, such as Kempston Hardwick Pit and Coronation Pit.
16. It is encouraging to observe UDX taking great pride in being recognised for its work to build healthy, sustainable environments in other well established projects, for example by the United States Environmental Protection Agency and the Council for Sustainable Florida for "protecting human health and the environment" and restoring disturbed and dehydrated wetlands to their former natural habitat, "helping to ensure that Florida will be enjoyed for future generations." As mentioned earlier, this site in Bedford has been subject to industrial degradation in the past and been the focus of concerted efforts by the local authority and independent local conservation groups in recent years to be supported back to achieve better environmental health.

This theme park project provides a valuable opportunity to take these developments to a whole new level.

17. We are aware that Biodiversity Net Gain (BNG) is not mandatory in the case of Special Development Orders (SDOs), however, this could be undertaken on a voluntary basis in order to demonstrate the achievement of positive impacts for ecology and nature in this project. The local Wildlife Trust recommend that undertaking a voluntary BNG assessment could strengthen the case for ecological enhancement and provide a quantifiable metric for net outcomes. CPRE Bedfordshire support this recommendation and would like to see a commitment from UDX to adopt this approach.

Noise

18. There are a number of small rural villages in close proximity to the theme park site that will be significantly impacted by the project if it goes ahead. These villages were already seeing the increasing urbanisation of the area around Kempston Hardwick from recent development and planned development. The anticipated volume of visitors would inevitably make the local area busier and noisier. Many residents are likely to be highly anxious about the potential impacts of the park in terms of noise and traffic.
19. UDX explain their approach as follows: “to make each area (we call them “lands”) within our theme parks work, we need our experiences to be truly immersive. A land at a Universal theme park cannot be an immersive experience if the music from the land next door is heard. That is why we design our lands, and use advanced technology, to focus all the sound and light effects inwardly.”
20. Ove Arup and Partners Limited (Arup) have undertaken a review of the noise and vibration chapter of the EIS on behalf of Bedford Borough Council BBC. In their report they express the opinion that “the stated low frequency sound levels for entertainment noise are relatively high and could lead to disturbance and complaint, especially at night.”
21. Arup recommend that UDX seek to “achieve noise levels well below those proposed in the EIS, particularly given the number of events for which consent is sought.”
22. It is important that UDX ensure that their approach works to effectively manage noise impacts upon the nearby village communities and work closely with residents and resident groups to allay their fears.

Transport Infrastructure and Transport Assessment

23. Recent announcements have confirmed the government’s commitment to provide funding for major upgrades of transport infrastructure to improve access to the theme park from the A421 and the new Wixams station, which is welcomed. However, CPRE Bedfordshire are concerned that the traffic modelling appears to be limited to the A421 and the area directly around the theme park site. The traffic assessment covers the A421 corridor, from the M1 junction 13 to the Black Cat roundabout which is a very narrow focus on the A421 and the roads immediately around the site.

24. UDX predict is that the complex will attract 12.5m visitors a year of which 40% of visitors will arrive by road, and two thirds will access the site via the M1 junction 13. Forecasts suggest circa 3.5 million visitors will be passing through the M1 junction 13 every year to get to the park.
25. In our view there needs to be a full assessment of the traffic impacts of the complex on junction 13. It should be noted that National Highways traffic consultants state junction 13 is 'the main capacity concern in the network'.
26. The impact of traffic arising from visitors to the park must be properly analysed and the cumulative impact of all planned new development around junction 13, including Marston Valley Villages and the warehouse expansion at junction 13, must be properly assessed and mitigated.

Water Supply and Sewage Treatment Capacity

Water Supply

27. CPRE Bedfordshire has severe concerns that the huge water requirements of the proposed Resort Complex itself, together with that due to the extensive additional developments that will take place following the establishment of the resort in the immediate area around Bedford, will not be able to be met by Anglian Water. This is principally due to the impact of Climate Change and future housing construction across the Ox-Cam Arc.
28. Additional development in the immediate area will be necessary in order to satisfy demand for services on top of those planned by UDX such as; hotel rooms, rental and Airbnb properties, cafés and restaurants. There will also be a need for extra homes for those taking employment at the park and additional warehousing to support the supply chains for goods required to serve the needs of the operation.
29. In the request for planning permission UDX identifies the Water Supply Requirements for the theme park in their Utilities Statement, Table 3-2 Water Supply Requirements as a massive 12.7 Mega Litres/Day (ML/d) of which 6.5 ML/d is for Potable Water.
30. This is for the theme park alone. It does not include the additional developments identified by CPRE Bedfordshire that will be generated around Bedford once the complex is operational. The identified water supply requirement is equivalent to that of a medium sized town.
31. UDX's Entertainment & Resource Complex will be built in an area designated by the Environment Agency as being under "Severe Water Stress".

Water Resources East 2050 Plan

32. The recently released Water Resources East 2050 Plan puts forward a strategy to overcome the serious water shortage issues in the East of England region and states as follows; "Eastern England is the driest region of the UK, receiving only two-thirds of average national rainfall. Many of the region's chalk rivers, peatlands, wetlands and sensitive water environments are in poor health due to decades of licensed over-

abstraction alongside other pressures. Housing growth and the region's agricultural production is at risk of being curtailed as access to existing water resources is reduced and the impacts of climate change are increasingly felt."

33. One of the principal solutions to the water shortages identified by Water Resources East in their 2050 Plan is 'Water Transfer' from areas with excess water resources to those areas with serious shortages. A Water Transfer solution to severe water shortages is no longer an option. The current drought conditions due to Climate Change experienced right across the UK during 2025, are showing that the areas previously identified by Water Resources East as having excess water supplies such as North Lincolnshire, are now also experiencing severe water shortages themselves.
34. CPRE Bedfordshire believe that water demand has been seriously underestimated by Water Resources East in their 2050 Plan. Since the 2050 Plan was published, the new Government has announced plans for substantial additional housing development across the Ox-Cam Arc (up to 1 million additional homes) with very substantial New Towns in areas such as Tempsford in Bedfordshire expected to be proposed very shortly. None of this has been incorporated into the Water Resources East 2050 Plan for additional water resources.
35. For the reasons stated above, CPRE Bedfordshire has no confidence that Anglian Water will be able to supply the water requirements of the proposed the theme park and the additional development that will take place around Bedford due to the Complex, in an environmentally sustainable manner.

Sewage Treatment Capacity

36. For the same reasons as identified above regarding water supply capacity, CPRE Bedfordshire believes that Anglian Water will be unable to provide environmentally sustainable Sewage Treatment Capacity for the theme park and the additional local development. Bedford Borough already has extremely serious sewage treatment capacity issues with raw sewage regularly spilled into the River Great Ouse causing very serious potential health issues to local people and to the environment generally.
37. Sewage is also backing up across large areas of Bedford itself and in other rural communities across Bedford Borough.

Implications for water supply and sewage treatment

38. Water Supply and Sewage Capacity are both linked and cannot be treated as separate issues. A Water and Sewage Treatment Plan for Bedford as a whole is required due to the proposed theme park and its impact locally.
39. UDX state that Anglian Water has a "legal obligation" to supply the water and sewage treatment capacity for the complex. This without any clear detail demonstrating how it will be achieved in an area of "Severe Water Stress", which is getting worse due to climate change. This is unacceptable for such an important issue.
40. CPRE Bedfordshire would like to see a comprehensive plan from Anglian Water as part of this application, detailing the additional water and sewage treatment capacity

that will be required for the entire Bedford area due to the proposed complex and how it will be delivered.

Committed Developments

41. The consultation documents refer to the approach to identifying potential Committed Developments both in terms of size/scale of development and distance from the theme park site boundary as having been agreed during engagement with Bedford Borough Council and Central Bedfordshire Council during April 2024.
42. Planning application CB/18/01969/OUT is a very significant proposed development which aims to deliver 5,000 homes covering the parishes of Brogborough, Marston Moreteyne and Lidlington. Allocated Site SA2 is currently out for consultation closing on 3rd September 2025.
43. We are surprised that this scheme appears to have been overlooked, whereas it would be expected that a development on this scale should have been taken into account.
44. In particular it appears that the Highways impact of SA2 has not been considered in the UDX submission, and the SA2 developer has not considered the impact of the theme park proposal in their most recent Transportation & Highways analysis.

Concluding comments

45. This request for planning permission through a Special Development Order for an Entertainment Resort Complex at the former Kempston Hardwick Brickworks is a massively significant scheme with the potential to bring economic benefits locally and for the wider region. However, development at this scale also brings substantial risks of negative impacts, both in the construction and delivery stages. It has potential to have adverse effects on the local environment and on the quality of life enjoyed by local communities.
46. CPRE Bedfordshire also have major concerns that the demands the theme park and associated development will place on water resources and sewage disposal services in an area under severe water stress, could present a serious obstacle to the successful delivery of the project.
47. Alternatively, if the water resources pressures can be resolved, and the mitigation measures as put forward in the EIS work effectively to minimise disruption and adverse effects, the scheme also has the potential accelerate and enhance the recovery of the environmental harms caused by historic industrial activity on the site.

Yours sincerely,

Martin Christopher
Chair, CPRE Bedfordshire