

OVG Manchester, Application Ref. 126431/FO/2020 - Response to Further

Representations 9th September 2020

The Local Planning Authority has provided an extract of further representations received in respect of OVG Manchester's planning application for a second arena in Manchester.

A summary of those comments is provided below¹ and a full version is provided at Appendix 1), followed by our careful consideration and response to the matters raised.

Summary of the Further Representations

The comment begins by stating the importance of the Manchester Arena to the footfall at surrounding retail developments and its role as a focal point for the evening economy:

"The area surrounding the Arena has become a focal point of Manchester city centre's evening economy as a consequence of the amount of footfall the Arena generates." The comments go on to note that: "The viability of the city centre's leisure economy is underpinned by the operation of a successful in-centre Arena. In order to determine whether the Eastlands Arena application conforms to relevant planning policy requirement, it is necessary to consider how the operation of the city centre's leisure economy would be impacted by the Eastlands proposal."

Against this context, it is noted that: *"Whilst the applicant has attempted to consider the potential expansion of the events market over the long term (based on scenarios which model a level of growth substantially above that which has been historically achieved)"* there has been: *"no direct assessment on city centre operators, in line with the Town Centres PPG paragraph 018 which requires applicants to:*

- establish the state of existing centres;*
- determine the appropriate time frame for assessing impact, focusing in the first five years (the 'impact test year' will generally relate to the second full calendar year of trading);*
- examine the 'no development' scenario;*
- consider the impact of the proposal on existing centres and facilities; and*
- set out the likely impact of the proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues."*

The representation follows by stating that the applicant has not appropriately addressed any of the above matters, based on the following points:

- 1. Lack of any meaningful consideration of the role and function of Manchester Arena and the degree to which neighbouring businesses depend on it for footfall. To do this, there would need to be an assessment of the current health of those facilities or the wider leisure offer.*
- 2. No attempt to understand the ongoing impact of Covid-19, which is likely to be apparent for many years to come.*
- 3. The information submitted by the applicant generally seeks to consider how the events market may expand over the long term (to 2035). However, the Town Centres PPG establishes that the relevant test year in respect of impact will be the second full calendar year of trading.*
- 4. The applicant has made broadbrush assumptions that patrons of Eastlands Arena would continue to use bars and restaurants within the city centre. It has not*

¹ In italicised text

undertaken a meaningful assessment of the diversion of trade from existing facilities to the application proposal.

5. *It is necessary to assess the likely trading position of leisure facilities within the city centre at the identified test year, both with and without the proposal coming forward. The difference between the two positions effectively relates to the impact of the proposal.*
6. *The quantum of commercial development included in the proposal (and the clear indication that the intention is to entice customers to travel early and stay late in order to stagger journeys) seeks to maximise the amount of 'spin off' custom on-site. This has clear implications for city centre food and drink operators, who are situated some distance from the application site.*
7. *As a consequence of the above, the impact of the proposal on the city centre has not been clearly identified. This is with regard to the second part of the NPPF paragraph 89 impact test (relating to the impact of a proposal on town centre vitality and viability). We also remain of the view that the applicant's approach to the first strand of the NPPF impact test (relating to impact on existing, committed and planned public and private in-centre investment) also remains wholly unsatisfactory. In this regard, we note that concerns in respect of the ability of the application proposal to impact on planned investment at the Factory, Mayfield and at the existing Manchester Arena have been dismissed without any detailed consideration of the factors that affect such multi-million pound investment. There is no objective analysis of the potential for similar operations to compete for the same events and therefore no meaningful assessment of the impact on likelihood of investment or the success of the investment should it proceed.*

The comments conclude by stating that: "The market would not support two large-scale viable events arenas in practice. There would be a substantial weakening of Manchester Arena's trading position which would lead to a significant adverse impact on the future operation of operators in the city centre and undermine planned £9m investment to refurbish the facility, which seeks to provide a market-leading interactive customer experience as a key city centre attraction."

Applicant's Response

Alleged impact on Vitality and Viability (NPPF Paragraph 89(b))

The applicant has extensively and robustly demonstrated, through its detailed market assessment, that Manchester can readily and viably sustain two arenas without undermining either. This is considered central to the question posed by the NPPF Paragraph 89 b

In summary, the applicant's detailed market assessment comprises:

- **Due Diligence Report Volume I: UK Arenas and Manchester Market Overview, by PwC.** This total market analysis addresses the growth of the global, UK and Manchester market. In addition, the document includes additional analysis of various arena markets, including London and other cities, and, PwC has produced an evidence based analysis on the size of the future market in Manchester.
- In the light of these market demand analyses, which are the key driver of financial success, PwC then reviewed the implications of these conclusions on the overall viability of both the proposed arena and the on-going viability of the existing arena. This work was informed by a published report by Grant Thornton, which was commissioned by the present arena operator and which also addressed viability thresholds for the existing arena.
- **UK Large Arena Market and Growth Scenarios 2018 – 2040, prepared by ekosgen.** Supplementing the total market analysis prepared by PwC, this document provides an analysis of growth scenarios in respect of the different market outcomes

for Manchester, based upon differing growth patterns. This work concluded with a clearly evidenced profile of growth, which represented not only a credible growth trajectory that was corroborated by industry leaders and market forecasters, but was also in line with the pattern of investment in other parts of the UK.

- **New Arena in Manchester, Assessment of Demand Report, prepared by Amion Consulting.** This body of work was further supplemented and underscored by specialist work overseen by Amion Consulting, which addresses actual consumer preferences and market penetration through surveys undertaken by the industry specialist, The Audience Agency.
- The survey work demonstrated the huge potential to widen and deepen the Manchester Arena market within the 90 min catchment by (a) reducing leakage to venues outside of the catchment to places including London; (b) unlocking latent demand for a new state of the art large arena; (c) increasing the frequency of visits for those already attending large arenas. This work demonstrated that these elements would drive 2.05m additional visits to the proposed arena, more than supporting ekosgen's central growth scenario of 1.27m additional annual attendance by 2035.
- Amion's report also highlights that simple population growth will naturally expand the available market and as a result, attendance at arenas is likely to increase without any supply side interventions or market development. By 2035, the local population (90 minute catchment) is set to grow by 8% which contrasts sharply with the forecast made by the existing Manchester Arena that attendance at UK arenas is likely to increase by just 5% by 2035 which would effectively represent decline in the market. The effects of population growth could add in additional attendance of between 0.24m and 0.38m (shared across venues). In addition, the new venue also has the potential to attract new audiences, including tourists, from outside the 90-minute catchment who do not currently attend arenas.
- The surveys also demonstrate that the existence of two arenas would protect the significant levels of visitor expenditure in the city centre that are currently derived from visits to the existing arena and generate significant additional economic impact from visitors to the new arena. The survey work demonstrated that respondents interested in the new venue would spend money in hotels, bars and restaurants in proportions broadly similar to attendees of the existing Manchester Arena which reinforces the forecasts of economic impact made by ekosgen for the project.

The representations invite the LPA to conclude that the Applicant's analysis involves growth projections which are overly ambitious. However, the objector does not present any credible assessment of market prospects to set against and counter OVG Manchester's evidence-based research.

This includes no challenge whatsoever (as far as we are aware) to the further detailed market capacity modelling and penetration analysis by Amion Consulting.

On this basis, we have previously raised concerns that the representation is essentially seeking to resist competition. It is not the purpose of the planning system to protect a monopoly supplier of facilities or to prevent competition, *"rather to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity,"* (NPPF Paragraph 8a).

The concluding comment in the representation argues that the existing arena's trading performance will be "substantially weakened"; however, this is not the same thing as its viability being undermined, such that its future is in jeopardy and indeed there is no attempt to renege upon the assessment previously made by Grant Thornton, whose independent report prepared on behalf of Manchester Arena, concludes that the existing arena would still break-even with a 45% fall in event numbers.

In making this comment, the objector is seeking to change the test to no impact on existing businesses which is, again, fundamentally anti-competitive. The test is significant adverse impact on existing, committed and planned public and private investments in a centre (89(a)), or town centre vitality and viability (89(b)).

The Applicant's submissions and its further response to earlier representations (29.07.20), demonstrates that the proposed retail / hospitality uses associated with the proposed arena are genuinely ancillary in that they are directly linked to audiences who attend events and will not normally be open outside event days, other than for ancillary use by sponsors and the local community. Such a hospitality offering is an integral element of modern arenas, as has been indicated in the initial concept redevelopment plans for the existing Manchester Arena, published in the Manchester Evening News, March 2020 and provided at Appendix K of our earlier response to representations (29.07.20).

The only exception is the very limited (circa 223 sq. m.) amount of retail floorspace, comprising up to three canalside kiosks and a kiosk to the external podium. Those kiosks could operate independently of event and match days as an adjunct to the leisure use of the canal; however, they clearly represent a highly localised offer.

Notwithstanding the ancillary nature of the proposed food and beverage offer, the applicant has previously carefully considered the likely diversion of trade from restaurants and bars from the City Centre on event days. That analysis, presented in our response to the representations (29.07.20) conclusively proves that the net beneficial impact of a second arena on hotels, restaurants and bars in the city centre as a whole will be significantly positive.

In this regard, the Audience Agency Survey, contained within the Amion report, shows almost the same pattern of spend and behaviour of attendees at the new arena as those who attend the existing arena, with regard to hotels, bars and restaurants. On this basis, ekosgen's further analysis contained in our further response to representations (29.07.20) concludes that with ticket sales of the central growth scenario (circa 2.3m total ticket sales in a single year, illustrative of the 2035 position), the two arenas would support a combined total of:

- Almost £57m of food and beverage expenditure per annum, with 50% of this in or close to the City Centre; and,
- 838,000 bed nights for hotels and serviced accommodation would be generated, 85% of which would be provided by City Centre operators.

Overall, ekosgen conclude that the move to a two arena model and the central growth scenario **will double the economic benefits to city centre businesses** from the large arena market. The scale of city centre benefits are considerable, estimated at almost £95m, with a major boost to the hotel sector and food and beverage businesses. In addition, OVG Manchester expect there to be £36m per year in direct annual local spending and the knock on effect of an additional 1,400 jobs across the City through the supply chain, and at local restaurants, bars and shops, as well as on accommodation and transport.

This significant level of additional benefit to the city centre will substantially outweigh any losses to City Centre trade from events that might otherwise have taken place at the existing arena which is primarily those customers who will arrive more than 30 mins in advance of an event starting. It is important to note that despite the objector seeking to place great emphasis upon such losses, their representation singularly fails to provide any meaningful assessment to evidence what they might be. Moreover it fails to recognise that such losses must be weighed against the substantial benefit to the City Centre as a whole (the test within Paragraph 89 of the NPPF) from the increased overall trade arising from the second arena.

Based on OVG Manchester's industry knowledge, local losses would amount to a displacement of circa £3m per annum from the City Centre which would otherwise be

spent at the various outlets close to the new arena. It is noted that no assessment at all has been provided by the existing operator as to what it contends that this figure might be (despite it having been invited to confirm whether this is a fair reflection of their current operational performance).

OVG Manchester has no access to commercial information regarding audience spend for the existing Manchester Arena, and it is telling that no such data has been provided by the objector (despite it making unsubstantiated assertions as to its extent). However, there is no reason to conclude that the pattern of spend would differ significantly from the proposed new arena, particularly in relation to audiences who arrived at the arena more than 30 minutes before events. In the unlikely event that we have underestimated the level of displacement (for example a 100% increase would increase displacement to £6million per annum), this figure is still more than outweighed by the increase in City Centre spend which will arise (the test being the effect on the City Centre as a whole under Paragraph 89 of the NPPF)

Rather than reducing City Centre trade (and activity) therefore, the Applicant's evidence demonstrates that a second arena would double the economic benefits to city centre businesses arising from the large business market by 2035 and substantially contribute to the vitality of, the City Centre for many years to come.

In addition, our analysis shows that Manchester Arena's market share has continued to decline, and therefore not only has it not been an economic driver of growth in the city centre economy over the last ten years but also that the actual net value of the existing arena's contribution to the City Centre has been steadily eroded. In this regard, attendances have more or less remained stable for years despite the growth in the wider entertainment market. Thus, the benefits of growth have by-passed both the existing arena and the City Centre.

The further comments from Manchester Arena go on to state that our impact analysis of Visitor spend is not localised enough and that the Applicant should not only be evaluating the impact on the City Centre as a whole, but the specific local impact on the visitor sector and in particular on the facilities in the vicinity of the existing arena. There is no warrant for such an approach in national policy (Paragraph 89 of NPPF).

It is not the role of the planning system in this case to prevent competition between one part of a City Centre (i.e. here the Printworks, Corn Exchange, Arndale and other facilities in the vicinity of the arena) with other facilities within the City Centre that would significantly benefit from the proposals.

The area around the existing arena is one of a number of clusters of visitor facilities in the City, with a range of restaurants and bars and there is simply no evidence to demonstrate that this area would not continue to secure more than its fair share of increased trade as a result of the additional spend opportunities – especially since most of their trading days would not coincide with days when the existing arena is hosting events which generate large crowds. Indeed, this effect happens now for European Football matches which take place at both the Etihad and at Old Trafford. This is not just because of the range of facilities which are provided in this cluster but also because of its vicinity to Victoria Station, which has approximately 8 million users per year, and the existence of Metrolink stops facilitating ready access to both the Etihad and Old Trafford.

The market analysis shows that two arenas can readily exist within the City without undermining the viability of either of them. The actual split of events between the two arenas will depend on many factors including the number of events in any one year and the capacity of the arenas to host them. Crucially, it will also reflect the ability of the two operators to embrace new opportunities, noting that this has successfully been done in other instances of arenas in overlapping catchment areas (as evidenced in PwC's Report), resulting in no arena having closed because of competition. Sports and entertainment events are likely to have an increasing profile in this new pattern of events, not just live music.

Thus, the events at the new arena will not arise simply from displacing events from one arena to another. To the contrary the clear position is that the market will widen and grow for the City as a whole and it will attract new events to the City which presently take place only in London amongst other places, and in that regard support the 'levelling up' agenda. This 'leakage' of trade arises from the dramatic loss of market share of the existing arena over time, and the effect of the new arena will be to 'claw back' a substantial part of that market share to the benefit of the City and Catchment considered as a whole.

Both operators will ultimately need to adapt their business models to embrace this diverse market and invest in their facilities to ensure they are equipped to provide the range of facilities which are required to sustain them in this changing market.

These points are of relevance to the misleading reference to the NPPG and test years, as set out within the objection. This is explained further below:

- Firstly, as a matter of status and weight to be applied in decision making processes, the NPPG is not consulted upon, unlike the NPPF and Development Plan policies. It is subject to no external scrutiny, again unlike the NPPF, let alone a Development Plan. It can, and sometimes does, change without any forewarning. The NPPG is not drafted for or by lawyers, and there is no public system for checking for inconsistencies or tensions between paragraphs. It is intended, as its name suggests, to be guidance not policy and it must therefore be considered in that light.
- Secondly, the NPPG's reference to test years (2 years after opening or when trading patterns mature) is intended for out of centre retail schemes e.g. supermarkets or retail warehouses. It is not intended to apply to leisure proposals of national and international significance. In any event, the time frame for trading patterns reaching maturity in this case will be over a longer period, which is consistent with the market analysis that has been provided by the applicant. This includes those points identified earlier in this response, which relate to the need to adapt and embrace the total market opportunity.

It is noted that prior suggestions of comprehensive plans for refurbishing the existing arena, required to embrace the market opportunities identified within OVG's detailed market assessment, appear to have been downgraded in this representation. From the material that has been consulted upon to date, prior to the submission of a formal application, this appears to relate largely to no more than a new front door/ entrance, and an investment of no more than £9m.

Without significant additional investment, the existing arena will continue not to function as a large arena and will become no more than a viable medium sized facility. The Applicant's evidence demonstrates however that Manchester needs two large arenas to fulfil all of its market potential. In addition, there is no reason - other than posturing - why the existing arena wouldn't be able to compete successfully for its fair share of the overall market. This would follow the aforementioned pattern of other two arena catchments where the existing arena invests and 'ups its game.'

Without additional investment in the existing arena, Manchester with two arenas will have a combined practical capacity which is similar to Birmingham with their two arenas at 36k which is before the planned expansion of the Resort Arena. Year 1 activity in the new arena is linked to 117 events across all event types and this is expected to rise steadily in the future. This has been benchmarked as being a sensible reflection of the current market and which will leave significant opportunities for the existing arena not only to achieve its viability threshold but to continue to succeed in the future by embracing the wider market opportunities identified in the detailed market analysis across sport, entertainment and live music.

Impact on existing, committed and planned public and private in-centre investment (NPPF Paragraph 89(a))

Our responses to the representations previously received (29.07.20) already address the part a) of NPPF Paragraph 89, relating to impact on existing, committed and planned public and private in-centre investment.

As a guiding principle, the National Planning Practice Guidance (NPPG) sets out that impact should be assessed on a like-for-like basis in respect of that particular sector. The proposal is for a large arena, and therefore it is not considered that it would have potential to impact on existing, committed and planned investments in the catchment where these are located outside of Manchester City Centre, as these would not compete directly given the different nature of the offer to a large arena.

In addition, for the reasons described elsewhere in this note, the ancillary retail, food and beverage offer is not of a scale that requires separate impact assessment and visitors to the arena would in fact generate beneficial impact to the city centre.

Therefore, the investments tested have been considered limited to major leisure destinations within the City Centre only, including: Factory Manchester; Manchester Arena Refurbishment; Depot Mayfield; The Printworks; Great Northern; Manchester Central Convention Centre; and, Other City Centre Music Venues, e.g. Apollo, Band on the Wall, Albert Hall, Warehouse Project.

In assessing the potential impacts on the investments identified, the following key considerations set out within the National Planning Practice Guidance have also been applied:

- The policy status of the investment (i.e. whether it is outlined in the Development Plan).
- The progress made towards securing the investment (for example, if contracts are established).
- The extent to which the proposed arena is likely to undermine the planned developments or investment based on the effects on current/forecast turnovers, operator demand and investor confidence.

The further comments specifically reference Mayfield and Factory. The Mayfield depot is only a temporary leisure use and funding plans will see permanent redevelopment start in the short term. In this regard, it was announced in August that £23m of funding support for Mayfield will be provided as part of the national shovel ready programme funded by the Getting Building Fund.

The Factory will be a cultural powerhouse at the heart of the North of England with a pluralist and unique programme of commissions which will be curated by Manchester International Festival (MIF). The vast majority of these events will be curated specifically by MIF for the Factory- only a few if any will be mobile for hosting by other facilities. While the programme is now being developed it will have building blocks that will reoccur on annual basis:

- Co-Productions that span across circus, theatre, opera, spoken word, dance, visual arts for example and which will cross art form and collaborations between artists, scientists and technologists.
- MIF - for the Festival itself;
- Exhibitions, music proms, Christmas experience for families and young children.
- A large scale community epic developed in partnership with a local co- producer for the Warehouse Project which in the past have been located at the Mayfield depot.

The Factory will be a commissioner of new works; OVG is intending to collaborate with the Factory during the MIF and other works not to abstract events which are commissioned by MIF but to see if through their commissioning capability there are events which they can jointly commission in the new arena. In this regard, it should be

noted that the existing operator has not, to OVG's knowledge, jointly produced any event with MIF for any of the Festivals since it commenced in 2005.

Based on our assessment, our conclusion remains that a second arena at the Etihad Campus will not have a significant impact on any existing, committed and planned public and private investments decisions within the Regional Centre and hence accords with NPPF paragraph 89(a).

Covid – 19

The comments state that *no attempt has been made to understand the ongoing impact of Covid-19, which is likely to be apparent for many years to come.*

In this regard, our previous response to the representations received has provided information in this regard and is not repeated in full here.

Fundamentally, the opening year of 2023 is beyond the point when the Bank of England expects the economy to have recovered. The Bank's Monetary Policy and Financial Stability Report, August 2020, reports that the economic impact of Covid-19 has been less severe than was first anticipated (9.5% versus an initial estimate of 14%) and that the recovery phase of the pandemic has arisen earlier than expected, supported by new fiscal and business support packages coming forward. Whilst the recovery period is expected to be slower than first forecast, the estimate is for the economy to get back to pre-Covid levels by the end of 2021. The opening year is well beyond this date and our assessment year will be even further into the future given the time for large scale leisure use to mature.

There are no significant changes reported in investment plans as a result of Covid-19. Proposals in Gateshead, London and Cardiff are all still in the planning process (it is also noteworthy that ASM Global are the sponsors of the Gateshead planning application).

In addition, the existing operator of the Manchester Arena continue to bring forward their proposals for the existing arena as evidenced by the recent submission of their planning application, which at the time of writing is awaiting validation.

The proposed second arena will deliver short and long term boosts to the economic recovery of the City Centre and the wider City Region, making this one of the most transformational investments by the private sector in the UK at this time.

Appendix 1:

There direct and significant correlation between the hosting of events at Manchester Arena and the level of footfall apparent at surrounding retail developments. The area surrounding the Arena has become a focal point of Manchester city centre's evening economy as a consequence of the amount of footfall the Arena generates. The critical importance of Manchester Area to the wider city centre was recently recognised by the Greater Manchester Combined Authority's Nighttime Adviser, Sacha Lord. In commenting on the recent difficulties faced by the leisure sector¹, Mr Lord acknowledged in straightforward terms that 'A lot of venues survive off the Arena...'. The viability of the city centre's leisure economy is underpinned by the operation of a successful in-centre Arena. In order to determine whether the Eastlands Arena application conforms to relevant planning policy requirement, it is necessary to consider how the operation of the city centre's leisure economy would be impacted by the Eastlands proposal.

Whilst the applicant has attempted to consider the potential expansion of the events market over the long term (based on scenarios which model a level of growth substantially above that which has been historically achieved), no such direct assessment of impact on city centre operators has been provided. The impact test clearly applies equally to retail and leisure proposals, and the prerequisites for assessment are set out in the Town Centres PPG.

The Town Centres PPG paragraph 018 requires applicants to:

- ♣ establish the state of existing centres;
- ♣ determine the appropriate time frame for assessing impact, focusing in the first five years (the 'impact test year' will generally relate to the second full calendar year of trading); ♣ examine the 'no development' scenario;
- ♣ consider the impact of the proposal on existing centres and facilities; and
- ♣ set out the likely impact of the proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues. We do not believe that the applicant has appropriately addressed any of the above matters. Firstly, there is no meaningful consideration of the role and function of Manchester Arena and the degree to which neighbouring businesses depend on it for footfall. There is no assessment of the vitality and viability of the city centre, nor any consideration of the current health of its leisure offer. There is also no attempt to understand the ongoing impact of Covid-19, which is likely to be apparent for many years to come.

Secondly, the information submitted by the applicant generally seeks to consider how the events market may expand over the long term (to 2035). However, the Town Centres PPG establishes that the relevant test year in respect of impact will be the second full calendar year of trading. We understand that the applicant intends that the Arena would be operational by 2023; this points to an impact test year of 2025. Thirdly, it is necessary to assess the likely trading position of leisure facilities within the city centre at the identified test year, both with and without the proposal coming forward. The difference between the two positions effectively relates to the impact of the proposal. No such comparative exercise, examining the likely performance of in-centre operators, has been undertaken. Instead, the applicant has made broadbrush assumptions that patrons of Eastlands Arena would continue to use bars and restaurants within the city centre. It has not undertaken a meaningful assessment of the diversion of trade from existing facilities to the application proposal.

The quantum of commercial development included in the proposal (and the clear indication that the intention is to entice customers to travel early and stay late in order to stagger journeys) seeks to maximise the amount of ‘spin off’ custom on-site. This has clear implications for city centre food and drink operators, who are situated some distance from the application site. Finally, as a consequence of the above, we do not believe that the impact of the proposal on the city centre has been clearly identified within any part of the extensive application submission. The above steps are of particular relevance to the second part of the NPPF paragraph 89 impact test (relating to the impact of a proposal on town centre vitality and viability). However, we remain of the view that the applicant’s approach to the first strand of the NPPF impact test (relating to impact on existing, committed and planned public and private in-centre investment) also remains wholly unsatisfactory. In this regard, we note that concerns in respect of the ability of the application proposal to impact on planned investment at the Factory, Mayfield and at the existing Manchester Arena have been dismissed without any detailed consideration of the factors that affect such multi-million pound investment. There is no objective analysis of the potential for similar operations to compete for the same events and therefore no meaningful assessment of the impact on likelihood of investment or the success of the investment should it proceed.

Conclusion The market would not support two large-scale viable events arenas in practice. There would be a substantial weakening of Manchester Arena’s trading position would lead to a significant adverse impact on the future operation of operators in the city centre and undermine planned £9m investment to refurbish the facility, which seeks to provide a market-leading interactive customer experience as a key city centre attraction. Both the Arena and city centre operators are of critical importance to the city centre leisure and night time economy, and to the vitality and viability of the city centre as a whole. As we set out above, no meaningful impact assessment – which is consistent with the requirements of the NPPF and the associated Town Centres PPG – has yet been submitted in support of the application.