Dear Sir/ Madam

**Torfaen Local Development Plan – Examination in Public**

We act on behalf of Prudential Property Investment Managers Ltd (PRUPIM), the managers of the Cwmbran Shopping Centre, owned by The Prudential Assurance Company Limited ("Prudential").

Prudential has owned the freehold of Cwmbran Shopping Centre since 1994. The shopping centre forms the town centre of Cwmbran and it is one of the largest pedestrianised shopping environments in Wales, with its origins in the post war new town movement. The Prudential’s ownership all falls within the presently identified Cwmbran Town Centre boundary.

On behalf of Prudential we submitted representations to previous rounds of consultation – the Deposit Plan Written Statement in May 2011 and Focused Changes in April 2012. We also commented on 9 August 2011 and 9 November 2011 on the Alternative Sites Register in specific response to the representations submitted in respect of the Homebase site and the Sainsbury’s site, both in Cwmbran.

GL Hearn will be attending the Torfaen LDP Examination in Public and will be taking part in Hearing Session 6 on Town Centre and Employment Matters dealing with Matters 2 and 3 including 2a, 2b, 3a and 3b.

We have produced two further statements setting out Prudential’s position on each of these matters which are enclosed.

This note summarises Prudential’s position on outstanding points and focused changes within the LDP that we commented on in our letter on the Focused Changes, dated 18 May 2012, that will not be covered at the hearing session on Town Centre and Employment matters. They are as follows:

**Policies S6 and EET5**

Prudential’s position remains as stated in our letter on the Focused Changes, dated 18 May 2012.

**Policies 5.9.2**

Prudential supports the change to paragraph 5.9.2 as stated in the Appendix 1 of the Extraordinary Council Meeting report dated 20 November 2012.
**Paragraph 7.2.5**

Prudential addresses changes made to paragraph 7.2.5 in the statement on Matter 3a for hearing session 6 on Town Centre and Employment Matters.

**Paragraph 9.19.4**

Prudential’s position remains as stated in our letter on the Focused Changes, dated 18 May 2012.

**Policy SOAs**

Prudential addresses changes made to the policies relating to the SOAs in the statement on Matter 3b for hearing session 6 on Town Centre and Employment Matters.

**Policy T1**

Prudential has no further comments.

**Policy RLT5**

Prudential’s position remains as stated in our letter on the Focused Changes, dated 18 May 2012.

**Other matters**

Prudential notes the change the Council has made to paragraph 9.19.2 to the capacity for comparison retail floorspace as set out in Appendix 1 of the Extraordinary Council Meeting report dated 20 November 2012, up to the words “… or a ceiling”. Prudential queries whether the remaining part of Focused Change FC32a (as set out in the Statement of Focused Changes, April 2012) for convenience floorspace will be included in paragraph 9.19.2. Prudential raises this on the basis that the November 2012 retail capacity update concluded that there is no capacity for further convenience floorspace in Cwmbran.

**Conclusion**

On the whole, we support the majority of changes made by the Council to the deposit LDP, which broadly reflect the comments we submitted. However, there are several specific further changes that Prudential considers should be made, as summarised above, and set out in our detailed representations, in order for the LDP to be found sound.

If you have any queries on the points raised, please do not hesitate to be in contact.

Yours sincerely

GL Hearn