

Comments received in response to the publication on 6 August 2008 of shortlisted sites and site assessments for a prison in Wales

Introduction

1. The search for a site in Wales for a new prison was instigated in the light of the strategic need for additional prison places and the policy aim of the Welsh Assembly Government that Welsh prisoners should be housed in prisons in Wales. This policy aim was supported by other interested parties including the Welsh Affairs Committee.
2. The original area of search for a site for a new prison covered South Wales and in particular the M4 corridor as being an area where a site would provide good access to the courts and the main centres of population. The Welsh Assembly Government subsequently proposed that a new prison should be located on a site in the Heads of the Valleys to assist regeneration and this area was considered as a possible location for a prison in South Wales. Sites in the Heads of the Valleys put forward by the Welsh Assembly Government were considered. Following the North Wales Criminal Justice Board (NWCJB) and others advocating a prison in North Wales, the search for a suitable site was extended to North Wales and a list of sites put forward by the NWCJB was considered.
3. A shortlist of potential sites was issued on 6 August 2008. The shortlist contained four sites – two in South Wales and two in North Wales – which appeared to have the most potential, based on the information currently available. One site is owned by NOMS. The other three are sites considered to have the most potential from those put forward by the Welsh Assembly Government and the North Wales Criminal Justice Board as being suitable and available. One is owned by a County Borough Council and one by the Welsh Assembly Government. The other has private owners who are in the process of developing proposals for the site and any acquisition would be subject to terms being agreed.

Strategic Need

4. There is an overall shortage of prison capacity in Wales. The key shortages are split between North Wales (around 800 places) and South Wales (around 500 places). As there are no women's prisons in Wales, there is a requirement for nearly 200 female prison places within this total.
5. The current prison capacity programme will provide 330 additional prison places at HMP Parc, Bridgend which will help to address the shortfall of male prison places in South Wales, and there is the longer-term potential for the new capacity to provide a further 135 places.

6. The long term prison population projections (based on the high scenario of the latest published prison population projections¹) indicate that in future years we may need to provide a further 1,700 places in Wales. This is in addition to the expansion that is underway at HMP Parc.

Site Criteria

7. Each site was assessed using the standard criteria that is used for all site searches by the Ministry of Justice. The criteria is shown below.
 - Sites should be an absolute minimum of 15 acres;
 - Close to or within large urban conurbations;
 - Within 1 hour (peak period) of key courts serving the key location in the region;
 - Have reasonable access to public transport and to major roads (motorways/A roads).
 - Sites with shorter access times to courts and centres of population will have higher priority.
 - Sites should not be overlooked.
 - Sites should be of regular shape.
 - Brownfield sites are preferable.
 - Sites should be reasonably level;
 - Not normally have significant public rights of way.
 - Sites should be capable of taking buildings up to 4 storeys.
 - Any contamination should be manageable.
 - Sites should not require major road building/not have access difficulties;
 - Nor have significant restrictions on existing buildings, nor include listed buildings that could prevent development;
 - It should be possible to connect main services easily and without unreasonably high cost.
 - Sites should not normally be in green belt areas.
8. Preference is for sites which would provide scope for a large prison of around 1,000 places and up to 2,500 places. This is to allow for some degree of future-proofing, by having the space for expansion if necessary.
9. However, smaller sites are also considered, particularly in key locations if large sites are not available.
10. Sites close to, or within, urban conurbations are preferred, to minimise travelling time. Prisons have a long history of such locations, including being adjacent to residential areas and public buildings.

¹ Prison Population Projections 2008-2015, published on 18 September 2008 and available from the Ministry of Justice's website at www.justice.gov.uk.

The Shortlisted Sites

11. The four sites that were short-listed were:

Location	Comments
<u>South Wales</u> Cwmbran (former Centrex site – police training)	This site is owned by NOMS, and is located in the original site search area of the M4 corridor.
Goatmill Road, East Merthyr, Whiteland, Merthyr Tydfil	This site was suggested by the Welsh Assembly Government. It is owned by Merthyr Tydfil County Borough Council, and is situated in the Heads of Valleys which is the location proposed by the Welsh Assembly Government for regeneration.
<u>North Wales</u> Firestone, Wrexham	This site was suggested by the NWCJB, and is owned by the Welsh Assembly Government.
Dynamex, Caernarfon	This site was suggested by the NWCJB and is privately owned.

Other Sites

12. When the shortlist was published, it was stated that any further sites that were put forward, and which seemed to have potential, would be investigated.
13. The site of the former North Wales Hospital, Denbigh, was put forward by its owners, and this has been the subject of a site assessment and discussions with the appropriate Council.
14. Comments received on the shortlist, also proposed that the Green Gates Farm site at St Asaph, owned by Denbighshire County Council, should be reconsidered. This site had been on the list of potential sites put forward by the NWCJB. The site was reviewed and discussions were held with the Council.
15. Four sites, at Dolgarrog (former Aluminium Works); Hirwaun Industrial Estate; Haford and Bryn South, Ebbw Vale were also reviewed. None were considered to have sufficient potential for a prison.

Deadline for Responses

16. The original deadline that had been set for comments on the shortlist was 31 October 2008. However, following representations, the Minister for Prisons decided to extend the deadline until 28 November 2008.

The Responses

17. A total of 85 responses were received from the public.
18. In addition, four petitions of objection to the Cwmbran site at Torfaen, were received, totalling 6,281 signatures, with 19 individual letters of objection, and 118 expressions of concern in a residents' survey conducted by Paul Murphy, MP for Torfaen.
19. In addition to accepting written responses, the Minister for Prisons held a number of meetings with constituency MPs and AMs to hear contributions.
20. Officials also met the following Councils:
- Denbighshire County Council
 - Gwynedd Council
 - Merthyr Tydfil County Borough Council
 - Torfaen County Borough Council
 - Wrexham County Borough Council.
21. Meetings were also held between officials and the following:
- "Oppose the Prison Action Group" (Torfaen)
 - Bluefield Caernarfon Limited (owners of the Dynamex site)
 - Chief Constable, Gwent
 - Freemont (Denbigh) Limited (owners of the North Wales Hospital site at Denbigh)
 - Huw Lewis AM (Merthyr Tydfil and Rhymney)
 - North Wales Criminal Justice Board
 - Welsh Assembly Government (Department for Economy and Transport).
22. Torfaen County Borough Council has issued a claim for Judicial Review of the process of seeking views on the shortlist of sites. However it has advised the Court that this should be held in abeyance until the decision on the preferred site has been announced.
23. The responses have been divided into those which are site specific and those of a more general nature.

24. The table at Annex A lists those who provided site specific comments during the public debate, together with a summary of their contribution; whereas Annex B lists those who provided more general comments, together with a summary of their contribution.

Site Assessments

25. Following discussions with local councils, and other stakeholders as above; advice received from Town Planning Consultants; and taking account of the site assessment criteria, each of the six sites were assessed. Notes on the assessments are given in Annex C.

Conclusion

26. Having taken into account all factors regarding the assessment of the sites, and the comments received during the public debate, the Minister for Prisons has decided that the location of a new prison in Wales should be in North Wales; and that the preferred site is the Dynamex site, near Caernarfon.
27. Acquisition of the site will be subject to satisfactory negotiations with the owners; confirmation that contamination on the site would not seriously inhibit any prison development; and a successful application for outline planning permission.

Site Specific Contributions

Site	Contributor	Summary of Comments
Cwmbran	"Oppose the Prison Action Group"	Submitted a petition (in excess of 6,000 signatures) against the use of the Cwmbran site and a video showing the "closeness" of the site to the adjacent residential areas. Also representatives met MoJ officials. The main reasons against the site:- • It is within a highly populated residential area. • It is near a Senior Citizens Complex. • There are 7 schools within a mile of the site. • There are inadequate policing levels to accommodate this prison. • Insufficient information about details of what is planned. • It will have an adverse effect on house prices locally. • It is adjacent to the biggest tourist attraction in Cwmbran, risking visitor numbers dropping to the Community Farm. • It will mean building on green fields on half the acreage of the site.
	Lynne Neagle AM (Torfaen)	Opposes Cwmbran Site. Reasons: • Located within residential area; • Local residents bitterly opposed; • Other areas support prison; Heads of Valley site would have bigger economic impact; • North Wales sites have more political and public backing; • North Wales: shorter travelling for visits to prisoners; • Cwmbran site would jeopardise current economic plan for Cwmbran.
	Torfaen County Borough Council	Opposes Cwmbran site: has initiated Judicial Review Process but requested it be held in abeyance pending announcement of a decision by Ministers. However and notwithstanding this potential challenge, and in order to comply with the original closing date for comments of 31 October 2008, the Council submitted their response on 27 October 2008. The Council stated that the following work should have been undertaken prior to the shortlist stage:- • The strategic process for reaching a decision that a prison is required in Wales; • Details of demographic work on optimum location;

		• An analysis of the process of choice of the shortlisted sites; • Details of Environmental Site Assessments; • Topographic and other studies; • The process, timescales and responsibility for delivering a prison; and • An environmental report under the “SEA Directive” process should be prepared and consulted upon. Other comments were as follows:- • Details of the decision making process following closures of discussion on the shortlist should be made available. • No evidence was submitted to support a prison proposal for the Cwmbran site in the emerging Local Development Plan. • Cwmbran site and adjacent land could potentially accommodate 700 houses (10% of future housing requirement of Torfaen): a prison proposal would threaten the implementation of this strategy. The site is one of the largest vacant brownfield sites within the County Borough with potential to greatly assist both the Council and Welsh Assembly Government’s priority for delivering affordable housing and meeting local housing needs. • The Council have been reluctant to propose alternative sites as requested as MOJ have produced no evidence to suggest that a systematic analysis leading to the identification of an optimum location has occurred. • There has been no assessment of sustainability issues in advancing the proposed sites which are geographically desperate and without logic. • There is no evidence of a Strategic Environmental Assessment. The “information vacuum” has caused considerable consternation in the local community. Elected members have not been able to debate the shortlist as so little information has been released. • The majority of residents strongly oppose the selection of Cwmbran. MOJ urged to engage in fresh and meaningful consultation exercise.
	Michael German AC/AM Leader, Welsh Liberal Democrats	Opposes Cwmbran: • More urgent need in North Wales or more central location in Wales than the South; • In area of high population; • Adjacent to doctor’s surgery; • Close proximity to sheltered housing complex;

		• Within ¼ mile of infant school, junior school and community centres; • Adjacent to Greenmeadow Community Farm – visited by children; • Site earmarked for housing in Local Development Plan; • Archaeological value of site.
	Chief Constable Gwent Police (Police area includes the Cwmbran site)	• Cwmbran unsuitable location. • Concerns about the potential impact on the area and community in the context of two key themes; • Effect on policing of roads – associated increase in volume of traffic; parking problems and potential accidents on already tested road infrastructure. Accepts that there could be improvements to local road and parking infrastructure. • Impact of a prison establishment in dense residential area on community, crime, disorder and anti-social behaviour. • Prison establishments in dense residential area not compatible with shared aim of improving public confidence as articulated in Government's Green Paper on Policing nor go towards reducing crime, disorder and anti-social behaviour. • Research has indicated that each year there are many incidents directly associated with prison establishments in residential areas around HMP Liverpool and HMP Altcourse. • Understands pressures on current prison estate and need to resolve issues of over-crowding and is not objecting to a prison being located in Gwent.
	Henllys Community Council	Strongly objects to the Cwmbran site.
	Rt Hon Paul Murphy MP (Constituency Member for Torfaen)	No objection to building of prison in Wales but to the suitability of the Cwmbran Site; draws attention to concerns expressed by local people; site surrounded on at least three sides by some of the most tightly packed housing in Wales; high proportion of families and older people live on door step of site; across the road from site is Community Farm which attracts thousands of visitors every year; OAP complex opposite site entrance; several doctor's surgeries within small distance. Local opposition to site is overwhelming; local politicians are totally united in their concerns; Welsh Assembly Government think that other sites are more suitable. Vital that concerns and objections of local people and politicians be given full consideration when making final decision.

The Ministry of Justice received 60 letters from the public opposing the choice of the site with one letter of support.

Site	Contributor	Summary of Comments
Goatmill Road Site	Merthyr Tydfil County Borough Council	Supports the Goatmill Road site. • Suggests strong local political support for site in Merthyr Tydfil; They have drawn attention to the debate in the Welsh Assembly on 14 October, where the Minister for Social Justice and Local Government stated “we, as an Assembly Government would have a strong preference for the Merthyr Tydfil site. They also state that there is cross party support for the site which is the formal position of the Council and its Leader. Also stated to be in support of location in Merthyr Tydfil are:- ➤ The local MP: Dai Havard; ➤ The First Minister and Deputy First Minister; ➤ The Leader and Chief Executive of Torfaen Council; ➤ The Chief Constable of South Wales; ➤ The Local Magistrates Court; and ➤ The Director of the Department of the Economy and Transport. ➤ Response from Leader of Council and Chief Executive. • Merthyr Tydfil has highest level of economic inactivity in Wales (amongst the highest in Europe) at above 28% of the working population. This has resulted in damage to the socio-economic conditions of the community – shortest life expectancy; lowest educational attainment, highest levels of chronic health problems in Wales. • Population in Merthyr Tydfil has been fastest declining population in Wales for several decades. • Compelling case for structural change to be introduced into Merthyr Tydfil to radically improve socio-economic conditions. • Cites way Council in partnership with other bodies has worked to lead region to sustainable new future. However, recently enormous job losses. Have quoted example, which we understand to be the Hoover Factory of some 500 jobs to be lost. • Introduction of a major new employer would counteract this; offering a real lifeline at a critical juncture in the region's revival. New prison presents just such a prospect and feel there is a compelling business case for re-investment. • Recognises tremendous regeneration benefits that new prison investment would bring together with powerful social benefits.

		• Would be well received in the community. • Summary of case:- ➤ The prison development would be accessible by excellent north-south/east-west dual-carriageways, for all of south and mid Wales. ➤ The site is ready, clear, and is unencumbered by planning problems. ➤ The Council has already indicated its support in principle to the current negotiations. ➤ The First Minister has announced his support for Merthyr Tydfil as the best site, as has the local MP, Dai Havard. ➤ The Minister for Social Justice and Local Government announced in the Welsh Assembly in October 2008, that the view of the Welsh Assembly was clear – that Merthyr Tydfil was the best site for the prison investment. ➤ The Chief Constable for South Wales supports the case for Merthyr Tydfil. ➤ All the above preceded the current news of major new job losses – based on the merits of the business case. ➤ There is no known opposition to this potential investment in the local community, despite it being widely written about in the local press. • Rare that so many positive, favourable conditions exist to support such a development in the most socio-economic region in the country.
	Welsh Assembly Government (Department for Economy and Transport)	Reports position of Welsh Ministers as:- Welcome additional prison accommodation in Wales; ideally in both North and South; no preference between them; like accommodation for women; if South Wales prefer Heads of the Valleys; of two short listed sites – prefer Merthyr Tydfil for regeneration benefits.
	Dai Havard MP	Echoes “positive attitude” of Merthyr Tydfil Council regarding siting of prison there; aware of benefits in terms of justice community; welfare and housing of prisoners; also in terms of employment training in Merthyr Tydfil and environs.
	Huw Lewis AM (Merthyr Tydfil & Rhymney)	Clear need for prison in Wales; greatly disturbed to see loss of one of the last remaining sites for industrial development; remain broadly supportive of new prison in constituency – does not feel that Goatmill Road is the right location. Legitimacy of consultation process in question; not enough facts provided to public or elected representatives to make qualified judgement regarding site,. Alternative locations should be considered away from residential; areas with better transport links.
	Brian Gibbons AC/AM (Minister for Social Justice and Local	Welcomes additional prison accommodation in Wales; insufficient capacity in South Wales and none in North Wales; strong case for additional provision in both North and South and has no preference

	Government)	between them. Essential that additional accommodation for women be provided in Wales. Of shortlisted South Wales sites, Merthyr Tydfil is preferred site; will bring regenerative benefits; cross party support for Merthyr option amongst elected members. Either site in North Wales would be welcome. Refers to debate in Welsh Assembly in which he set out the Welsh Assembly Government position.
	Chief Constable South Wales Police (Police area includes the Goatmill Road site)	Fully supports site for prison development. Records imperceptible negative reaction from the community: increased demands and considerations from police perspective but these could be catered for within existing emergency planning. Regeneration benefits from such an investment would be significant for the area and economic and social regeneration would have a positive impact on crime and criminality. Reasonable to assume that majority of prisoners housed on site would be from South Wales and such a facility would also support the welfare needs of families who would be afforded much easier access to prisoners. Location also benefits from excellent road network.
Firestone, Wrexham	Ian Lucas MP	Re-assured by, David Hanson, the Minister for Prisons that Wrexham is not being considered as a Large Prison Complex. Supports case for prison in North Wales but one that is geographically centrally based – the distance from Caernarfan Court was highlighted as strong weakness in the case for a prison in Wrexham.
	Wrexham County Borough Council	Fully supports a prison in North Wales. Did not provide a view on the Wrexham site (see entry under General Comments below).
Dynamex, Caernarfon (Formerly known as Ferodo site)	Gwynedd Mon Youth Justice Services	Strongly advocate custodial establishment in North Wales located close to community ties. Full support for the proposal for a custodial facility on the Ferodo site, Caernarfon. Strongly supports young person's custodial facility as part of North Wales prison.
	Iwan T Jones (Strategic Director Development Director) report to Gwynedd Council Meeting on 4 November	Gwynedd Council supports development of the new prison on the Ferodo site in Caernarfon.
	Isle of Anglesey County Council Executive	Resolved to support Gwynedd Council's efforts in promoting the Ferodo site.
	Gwynedd Local Health Board	Clear need for additional capacity in Wales; specifically North Wales. North Wales residents disadvantaged by current configuration of services which impacts negatively on rehabilitation, reintegration and family relationships. A South Wales site would exacerbate the existing concerns. Ferodo site offers unique opportunity to address these concerns; would improve local services; make

		best use of resources; bring economic benefits. Board recognises distinctive health needs of prison population and keen to work with partners at the Caernarfon location to ensure health needs are met in timely and appropriate manner.
	Conwy County Borough Council	The most significant unmet regional need relates to young people and women prisoners; strongly advocate site in North Wales; preferred option is the Caernarfon site.
	Bluefield Caernarfon Limited (Owners of Ferodo site)	Supportive of the site for a proposed prison.
	Councillor Sian Gwenllian (Ward Member)	• In full agreement that there should be prison provision, especially for young offenders in North Wales; welcomes job opportunities; • Needs to be certain that some if not all local concerns can be addressed; ➤ Would a prison development aggravate local drugs problem?; ➤ Would visitors and release prisoners increase crime and anti-social behaviour?; ➤ Would there be an influx of professional people to the area to work at the prison buying properties and making use of local schools? Would this increase the present problem of local people being housed out of the housing market? ➤ Would there be pressure on school places? ➤ Would the “self imagery” of the area suffer? ➤ Would it have an adverse affect on economic development tourism?
Denbigh (Former North Wales Hospital)	Freemont (Denbigh Ltd) (Owners of the site)	Maintain that there is overwhelming support for a proposed prison on the site. States that, following discussions with Councillors and others, there would be considerable concern at the use of the Green Gates Farm site. Allocated in UDP for “high tech” employment use. More support for hospital site following previous use as a “mental asylum”. Has submitted indicative design for 1000-1500 place prison on site. States that there is support from the following amongst others for the choice of the site:- ➤ Denbighshire County Council Cabinet Resolution – to promote this site for a prison ➤ Town Council – in favour ➤ Local and regional councillors in favour ➤ Local Community in favour – through 2 questionnaire consultations undertaken ➤ Chris Ruane MP, David Jones MP, Elfyn Llwyd MP and Janet Ryder AM – all in favour ➤ Chief Constable – Richard Brunstrom – in favour ➤ North West Criminal Justice Board – in favour ➤ Deputy Mayor (Ian Davies) of Denbigh – in favour ➤ Business Leaders – in favour, including Mr Jones former Chairman of the North Wales CBI

		and Lord Lieutenant of Clwyd Responds to three issues understood to be of concern to MOJ. <u>Public Transport</u> Commutated sum agreed of £110k as part of existing mixed use planning permission towards transport, part of which is a contribution towards a bus entering the site., prison use would make a bus route even more sustainable. <u>Tree Preservation Orders</u> Confident the Council would take a sympathetic view towards any proposal to remove trees. <u>Listed Buildings</u> There is the prospect of further demolition of all ancillary buildings other than the main building itself.
	Denbigh Town Council	Urges that serious consideration be given to the development being built on the hospital site, good road links; welcome boost for employment and bring significant economic benefits to the town; a prison development would have the support of the majority of the local community. The Council has resolved that it is strongly in favour of the prison being built in Denbigh.
	Janet Ryder AC/AM	Supports Denbigh Town Council; be of great benefit in job security and boost to local economy.
Green Gates Farm, St Asaph	North Wales Criminal Justice Board	Supports the two sites in North Wales on the short list but also the Green Gates Farm site. Believes the latter would meet all needs (see entry under General Comments below).
	Denbighshire County Council	Asserts that there are compelling arguments in favour of selecting the Green Gates Farm site (see entry under General Comments below).

General Contributions

Contributor	Comments
Welsh Language Board	In discussing location of new prison MoJ to act in accordance with Welsh Language Schemes. Should ensure when selecting site that due consideration given to the need to develop Welsh Language services for prisoners.
North Wales Criminal Justice Board	Together with six local authorities in North Wales unanimously support a new prison in North Wales as soon as possible. Board supports the two sites in North Wales and also the Green Gates site at St Asaph but believe that a central site like the Green Gates site would meet all needs as well as 'English prison' needs.
Judicial Issues Group	Support for North Wales prison either Caernarfon or Wrexham.
Denbighshire County Council	Strongly supports need for a prison in North Wales; consideration should be given to two sites in Denbighshire – Green Gates Farm, St Asaph and/or North Wales Hospital in Denbigh; feel compelling arguments in favour of selecting Green Gates Farm site.
Vice – Chancellor Bangor University (Professor R Merfyn Jones)	Supports proposal that a prison be built in North West Wales. Well aware of economic and social benefits of a prison development draws attention to synergies, particularly in fields of training and research which could exist between a prison and the university.
North Wales Probation Board	Endorses both North Wales sites as suitable for multi-purpose unit capable of providing segregated accommodation for the different custodial needs of the area. Disappointed that a potential site was not identified in the Denbighshire/Conwy area which could provide the optimum solution for a central facility within an hour of both Crown Courts at Mold and Caernarfon and the majority of Magistrates Courts. Green Gates Farm at St Asaph would be well positioned to recruit local Welsh speakers with the skill mix needed for staffing a custodial facility.
Welsh Assembly Government Officials	Welcome the proposal to provide additional prison capacity in Wales; do not have a preference between North or South Wales for any additional capacity; ideally like to see developments in both areas; particularly anxious to secure provision for women prisoners in Wales. No preference between the 2 sites put forward for North Wales. In South Wales, the Merthyr Tydfil site is favoured. This is inkeeping with their Ministers continued preference for a Heads of the Valleys location because of the regenerative benefits it will bring. There is also local support for the Merthyr site but continued opposition to the Cwmbran site.
Wrexham County Borough Council	The Council's position was agreed at a meeting of its Executive Board on 2 December 2008.

	Fully supports the need for a new prison in North Wales. Does not support the view that the location of a new prison in South Wales could possibly serve the needs of prisoners from North Wales. Present arrangements whereby prisoners and their families travel to England puts unacceptable logistical pressure on these people and on the system and does not properly support and reflect the Welsh language and cultural needs of the people of North Wales. Recognises prison development as an important economic driver. Does not wish at this stage to comment on site specific issues. Hopes that the Minister will announce his decision as soon as possible.
North Wales Economic Forum	Welcomes the Ministry of Justice's consultation; strongly supports the need for a prison in North Wales commensurate with the number of prisoners from the region; North Wales needs a prison in preference to South Wales; certainly if only one site is to proceed in the principality as all prisoners from North Wales have to serve their sentences outside the region – a high proportion of South Wales prisoners serve their sentences in the region. Arguments in favour of North Wales Site:- Social need; reduce cost and impact on public services; better cater for needs of Welsh speaking prisoners; provide very significant and relatively secure economic benefits. Both shortlisted North Wales sites are close to areas appearing in the top 10% of the 1,896 areas in the Welsh index of multiple deprivation. The Caernarfon site is within the convergence area where the highest levels of EU intervention were also available. Feels that the process followed by the Ministry has not been sufficiently transparent and that in the interests of transparency and accountability the Welsh Assembly Government's response to the shortlist should be published.
North Wales Regional Partnership Board	Welcomes the Ministry of Justice proposals that include potential sites for a prison in Wales and commends all the sites from North Wales in the consultation to the Ministry. Believes that priority for a new prison in Wales should be given to North Wales: all prisoners from North Wales have to serve their sentences outside the region, whereas a high proportion of prisoners from South Wales are able to serve their sentences within the region. Local provision would enable use of the Welsh Language for all categories of prisoner. A prison would be a much needed regeneration opportunity. The Board is concerned that the Ministry's process has not been sufficiently transparent.

Site Assessment Notes

Site: Cwmbran	
Ownership	Ministry of Justice (NOMS)
Size	C 39 acres
Potential Capacity	Up to 1500 prisoner places
Topography	Undulating – severe in places
Shape	Broadly rectangular
Strategic Location	In M4 corridor which provides access to courts and main centres of population
Transport connections	Connected to strategic road network via local roads to A4051 with access to the south with M4 at J26. To the north, the A4042 links to the A465 Heads of the Valleys Road and the A40 giving east-west strategic links. Bus route runs along adjoining Greenmeadow Way. Rail: Within a mile of site linking to Swansea – Paddington mainline and mainline services to Manchester and Crewe.
Site access	Already provided off Greenmeadow Way
Planning Policy	The allocation of the site as a strategic housing site emerging through the Local Development Plan puts a proposal for a prison in a much weaker position than under the adopted Torfaen Local Plan. The Ministry has made representations for the site to be designated for prison use in the LDP. If this is not accepted a prison proposal would be viewed as a clear departure to the Development Plan which would be a key reason for the Council to refuse a planning application.
Other comments	Screened; not overlooked. Former police training complex in situ. Weston Power 11KV over ground and buried power lines cross south eastern part of site. The most distant and middle-distant views will be screened or reduced by topography, vegetation or built form. Closer views will be more extensive. There is suitable habitat within the site to support bats, badgers, nesting birds, great crested newts and reptiles. It is proposed to designate the site as a SINC because of its grasslands and for the presence of bats, grass snakes and birds. Development of both previously developed and undeveloped sections of the site would require careful design of suitable drainage management schemes. The fact that Torfaen qualifies for European Convergence funding and is a Tier 1 Assisted Area are clear indicators of deprivation. However, Cwmbran has suffered less from the decline in traditional industries and unemployment has

	reduced significantly in recent years.
Infrastructure	Services and utilities already provided to site.
Advantages	- Owned by the Ministry of Justice. - Partly brownfield site which has previously supported a substantial single use employment complex. - Accessible to centres of population and courts along M4 corridor and locally; close to town centre with its services and transport links.
Disadvantages	- Emerging as a site that will have a residential allocation which will make it more difficult to secure a prison planning consent. - Local Planning Authority is strongly against the development of a prison. - Potential loss of all or part of a proposed SINC will need to be compensated for with replacement habitat.

Site: Goatmill Road, Dowlais East of Merthyr Tydfil	
Ownership	Merthyr Tydfil County Borough Council
Size	C 29 acres
Potential Capacity	Upto 900 prisoner places
Topography	Flat. Reclaimed land. Previously mining and mineral tip
Shape	Irregular
Strategic location	Dual carriageway road access to M4 corridor which provides access to courts and main centres of population.
Transport connections	Approximately 20 miles from Junction 32 of M4 via A470 (dual carriageway) and 1.5 miles from A465 Heads of the Valleys Road via A4060. Buses available within a mile of the site from Dowlais. Rail via Merthyr town centre – 2 miles from site : services across Valleys to Cardiff in an hour.
Site access	Hammer Head access already provided
Planning Policy	The existing employment allocation on the site is positive in terms of the prison development – prisons having an employment generating use. No ecological constraints. Unlikely to be of archaeological importance in view of previous use and reclamation.
Other comments	Put forward by Welsh Assembly Government; situated in Heads of the Valleys, the location proposed by the Welsh Assembly Government for regeneration. Cleared brownfield site. Further information needs to be obtained on ground conditions as previous mining may restrict the extent the site can be developed.
Infrastructure	Needs further investigation; including utility services, drainage would need upgrading; existing electricity substation would require additional transformer or the provision of a new substation
Advantages	- Owned by the local planning authority. - Cleared, flat brownfield site.

	- Identified for employment uses. - Local Authority support for prison development on site.
Disadvantages	- Potential significant ground condition issues. - Residential allocation adjacent to site. - Potential issues of the capacity of some services.

Site: Firestone, Wrexham	
Ownership	Welsh Assembly Government
Size	C 108 acres
Potential capacity	Between 1,000 and 2,000 prisoner places (Not Large Prison complex)
Topography	Mildly undulating
Shape	Regular
Strategic Location	2/3 miles from centre of Wrexham in that part of North Wales from which the greater number of prisoners from North Wales originate. However, away from main courts which are in the Caernarfon area.
Transport connections	Wrexham is located on the strategic road network but local links to this wider network are poor for a number of reasons but will improve in 2011. Bus services from the town centre with a half-hourly service to the Industrial Estate bordering the site. There is a demand responsive service to the Estate: "the Wrexham Shuttle". Welsh Assembly funding for the service in 07/08 but long term position is unknown. Rail: access via Wrexham Central and generally offering both local and more strategic direct services and connections at Chester and Shrewsbury.
Site access	Hammer Head access already provided.
Planning Policy	The site's position with the defined boundary of the industrial estate with its presumption on single use employment activity is positive in terms of future prison development – prisons being an employment generating use.
Other comments	Put forward by North Wales Criminal Justice Board (NWCJB). Cleared brownfield site; not overlooked; extent of contamination unclear; Mitigation pressures would have to be undertaken for newt population would have to be relocated; other ecological mitigation measures would be required. No known features of archaeological importance. Further report on ground conditions required.
Infrastructure	Needs further investigation, including utility services.
Advantages	- Owned by the Welsh Assembly Government. - Cleared, relatively flat brownfield site. - Identified for industrial/employment uses. - Northern and Southern road access improvements imminent.
Disadvantages	Ecological sensitivities could impose some constraints

	on location of development. • Accessibility (but improvements planned)
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Site: Former Dynamex Site, Griffiths Crossing, Caernarfon	
Ownership	Privately owned.
Size	C 45 acres
Potential capacity	600 – 900 prisoner places.
Topography	Mainly flat with steep entrance.
Shape	Regular shaped site.
Strategic location	In area where main courts in North Wales are situated; but away from area in North Wales where greater number of prisoners from North Wales originate.
Transport connections	Connected to strategic road network having access to A487 which links to A5 which in turn links to the A55 North Wales Expressway and the A470 providing road access to the north-east, north-west and mid-Wales. Bus service between Caernarfon, Bangor and Llandudno (among other destinations) – Caernarfon is 2 miles away. Rail: Bangor 9 miles away. 20 minutes by road. Coach: Extensive strategic services from Caernarfon.
Site access	Steep access, narrow bridge.
Planning Policy	Emerging development plan has focus on recycling/waste activity and owner progressing proposals for mixed use redevelopment. Both have employment aspect and this taken together with site's previous employment use would not preclude a planning application for a prison development.
Other comments	Brown field site with former factory buildings in-situ. Mainly screened but overlooked from A487 and Anglesey Coast. The Menai Strait and Conwy Bay Special Area of Conservation does not extend on shore to the site. Part of the site has been identified as a PSAC. However it is understood that this should not restrict appropriate development of the site. Waste asbestos known to be buried on site. Other unspecified contaminated materials are referenced as being present on site.
Infrastructure	Assume relatively resilient given nature of previous site use.
Advantages	• Private owners of site willing to sell site if agreement on a sale can be reached. • Brownfield site, previously supported a substantial single use employment complex. • Accessible to a number of centres of population including Caernarfon and Bangor. • Accessible to the main North Wales Courts in the area.
Disadvantages	• Owner at an advanced stage of developing proposals

	for the redevelopment of the site (but willing to considered sale – see above). • Not cleared/remediated site. • Site to be designated as SINC.
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Site: Green Gates Farm, St Asaph	
Ownership	Denbighshire County Council.
Size	73 acres.
Potential capacity	To be established. See "Other Comments".
Topography	From A55 slight slope downwards.
Shape	Regular.
Strategic location	
Transport connections	Connected to strategic road network, access to A55 via a grade separated interchange to the adjoining Business Park offering strategic links across North Wales and access to A525 to Mid and South Wales. Rail: From Rhyl, approximately 10 minutes by road. Bus: Serves Business Park.
Site access	At present only from Cwtir Lane, a minor rural road. The County Council have indicated that improvements to this road would be possible or creation of a direct access from the Business Park would be possible.
Planning Policy	Discussions with the Council indicate that the principle of a prison development is likely to be acceptable.
Other comments	Site constraints are:- Stream bisects site. Waterpipes cross the site as does a surface water outfall and surface water drain and these have associated wayleaves and easements; Numerous overhead electrical power lines (11KV to 132KV) cross the site; There is an indicative 50m wide easement associated with the proposed connection between the National Grid and an offshore wind farm. The Council believe that a deviation to the route could be negotiated with N Power. The council have indicated that there may be foul drainage capacity issues with the existing system if the entire site is redeveloped. High possibility of great crested newt colony.
Infrastructure	Mains water to farmhouse and Business Park. Welsh Water has project underway to upgrade main water supply – timing and capacity require confirmation; Gas main serves adjoining sub-station.
Advantages	- Owned by Denbighshire County Council. - Brownfield site which has previously supported a substantial single use employment complex.

	Accessible to a number of centres of population being at a mid point in North Wales.
Disadvantages	Not cleared/remediated site.

Site: Denbigh: former North Wales Hospital	
Ownership	Privately owned.
Size	C 50 acres within total site area of some 126 acres.
Potential capacity	Approx 1,000 but needs to be confirmed.
Topography	Undulating: steep in places – especially at rear of site.
Shape	Fairly regular.
Strategic location	
Transport connections	B4501 links to A453 which is strategic route connection with A525 and wider trunk road network (avoiding town centre) including A55 North Wales Expressway and A543/A5 to South. No significant traffic issues; traffic flows in vicinity of site are low. Infrequent bus service passes site – otherwise town centre. Rail: Rhyl – 10 miles away. 20 minutes by road.
Site access	Made up to site: Pont Ystrad Road to east and B4501 to west.
Planning policy	Site benefits from a number of extant planning and listed building consents. The adopted UDP refers to a realistic but flexible approach to the future development of the site. The objectives are a viable alternative use or mix of uses for the site and for any development proposed to contribute to the viability and vitality of Denbigh Town. Develop and use of the site should be mainly for employment or economic uses along with any associated facilities and service sector uses. Development proposals should be of high quality and respect the integrity of the listed buildings and their setting as a whole. Policy states that any new development should be confined to 'infilling' and that size, mass, height and coverage of new buildings be of high quality and appropriate density and sub ordinate to retained listed buildings, new buildings should take account of views into/out of site. This represents a restrictive and conservation led approach to development which is likely to pose limitations as the opportunity to design and locate a prison on the site.
Other comments	Brownfield site with former hospital buildings in situ (hospital closed 1995) some Grade II listed. Recently suffered fire damage. Surrounding area mostly open countryside but not severely exposed/overlooked. Evidence of bats.
Infrastructure	The site supported a regional hospital complex which would have required substantial and resilient services.
Advantages	• Private owners willing to negotiate (but not clear sale or lease). • Identified for employment led regeneration.

	• Appears to be level of local political support for development of prison on site. • Easy access to Denbigh and is relatively accessible strategically. • Large site close to town centre but well screened within a mature landscape setting.
Disadvantages	• Significant Grade II/Grade II* listed buildings on site and the conservation and restoration requirements are significant. • Private owner at an advanced stage of planning with mixed use redevelopment proposal.

Contact Details:-

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