I would like to address the following point:
- **The potential for new prisons in Wales**

I am writing in a personal capacity, specifically regarding the proposed site at Baglan, Port Talbot. I have lived in Port Talbot all of my life, 57 years and was brought up on the Sandfields Estate in Aberavon. I have first hand knowledge of the site of the proposed prison on Baglan Moors, a site of bog and marsh, I used to collect tadpoles and frogs on the Baglan Moors as a child.

**Executive Summary**

- The Baglan Moors site should never have been included on the list given to the Ministry of Justice as a suitable site in the initial stage as it was at the time a C2 flood zone.
- The proposed site has a covenant restricting its use
- This site is within 1 mile radius of over 5000 school children and 11 schools
- Planning Policy Wales TAN 15 clearly states any new development should be directed away from flood zone C and towards suitable land in zone A, otherwise to zone B
- This proposed prison does not meet the Welsh Governments own Well-Being of Future Generations (Wales) Act 2015
- Port Talbot has the second highest drug mortality rate in the UK and is one of the most deprived areas in Wales
- The construction costs for the proposed site will be far more than any of the other proposed sites due to the groundwork required to put in foundations/pile-driving prior to the prison build.
- The electrical infrastructure within the proposed area is already fully loaded, there will be substantial costs to modify the existing electrical infrastructure to accommodate the proposed prison.

1. There is a very strong community feeling opposing the site of Baglan Moors being developed for a proposed prison. This site has always been prone to flooding and until February 2017 was designated as C2, defined in TAN 15 as ‘used to indicate that only less vulnerable development should be considered subject to application of justification test, including acceptability of consequences. Emergency services and highly vulnerable development should not be considered’. In March 2017, NRW updated their development advice maps (which had previously been the responsibility of Welsh Government) to indicate that this land was now reclassified as C1. However, according to the TAN 15, new development should be directed away from zone C to zones A or B, as this land is not prone to flooding.
2. It is very concerning that this site was even considered and placed on the list of proposed prison sites as it was a designated a flood plain and had a covenant on the land. The covenant on the land states that the land should be used for light industrial use and not any noisy or dangerous trade or occupation which could be a nuisance to the owners or occupiers of neighbouring premises.

3. At a recent Public Meeting a representative from the MOJ stated that it was an ideal site for prisoners to integrate into the community. The proposed prison will be a training facility and this will allow prisoners to be released into the community. This is alarming for residents and extremely worrying for parents as there is a super school just over 600 metres from the proposed prison site. A second super school (Welsh language secondary) will be opened in 2018 within the same distance. There are 11 schools with 5065 children within a 1 mile radius of the proposed prison. As a governor of a local secondary school, I can see that this presents significant safeguarding issues.

4. There are major concerns over the effect and impact that this facility would have on transport and the surrounding infrastructure. There are already traffic management controls in place in the area to try and ease congestion issues at peak periods especially the M4 Motorway. The M4 Motorway in the area is severely congested of an evening, this would seriously curtail any emergency services that may be required if there was an incident at the proposed prison. This extends to the social impact and in particular the drug related incidents in the locality. Port Talbot has the second highest drug mortality rate in the UK, putting a prison in the area will only exasperate the situation.

The proposed site of Baglan Moors for a new prison is totally unacceptable on a number of fronts:-

- Safeguarding of the 5,065 school children within a mile radius of the proposed site
- The proposed site is a flood plain
- The cost of the build will be significantly more than any other proposed site
- The cost of electrical infrastructure changes in the area will be considerably more than any other proposed site.
- The proposed site is a greenfield site.
- The road infrastructure will be severely overloaded with the increase in traffic as a result of the prison build and prison visitors
- The siting of a prison in this area will increase the already difficult situation regarding drug mortality

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