

Annual scrutiny: National Infrastructure Commission for Wales 2024

April 2025

Introduction

- 1.** The National Infrastructure Commission for Wales (the Commission) was established in 2018 as an independent, non-statutory advisory body to the Welsh Ministers. Its primary purpose is to make recommendations to the Welsh Government about Wales' long-term infrastructure needs.
- 2.** The Climate Change, Environment, and Infrastructure Committee (the Committee) has agreed to undertake annual scrutiny of the National Infrastructure Commission for Wales.
- 3.** This is the Committee's third report on the Commission. It focuses on the Commission's Annual Report 2024¹ and builds on the views expressed in our previous reports, the first report² published in March 2023 and the second report³, published in April 2024.
- 4.** On 20 February 2025, the Committee held a scrutiny session with Dr. David Clubb, Chair of the Commission, Dr. Eurgain Powell and Eluned Parrott, both members of the Commission.

¹ National Infrastructure Commission Wales [Annual Report 2024](#).

² Climate Change, Environment and Infrastructure Committee (CCEI), [Annual report on the National Infrastructure Commission for Wales – 2022-23](#), March 2023.

³ CCEI, [Annual scrutiny of the National Infrastructure Commission for Wales: 2023](#), April 2024.



1. Role, remit, and ways of working

Welsh Government review

5. Under the Commission's terms of reference, the Welsh Government must undertake "a comprehensive review of its [the Commission's] status, remit and objectives at least once every five years"⁴.

6. In its last annual scrutiny report, the Committee recommended that:

*"The Welsh Government must deliver on its commitment to undertake a comprehensive review of the Commission's status, role and objectives before the end of 2024. We expect the Welsh Government to consult the various infrastructure sectors and other relevant stakeholders to inform the review."*⁵

7. This recommendation was accepted by the Government and the review was taken forward by the Welsh Government's Internal Audit Service.

8. The Cabinet Secretary for Economy, Energy and Planning, Rebecca Evans MS, recently wrote to the Committee reporting on the outcome of the review.⁶ On the findings, the Cabinet Secretary says:

*"I am pleased that, overall, the review gives NICW a 'light green' assurance status, which indicates a reasonable assurance that governance, risk management and control processes are suitably designed and applied effectively. However, the report identified six observations that require attention. These largely involved matters which are in the gift of the Chair...and the 'Management Actions' have been accepted by officials to work with the Chair to address these."*⁷

9. The audit report provides more detail on these issues and the actions identified as a result. The review identified a number of strengths including that:

- changes made since the first Commission have been effective;

⁴ Welsh Government [National Infrastructure Commission for Wales Terms of Reference](#) 2022.

⁵ CCEI Committee, [Annual scrutiny of NICW: 2023](#), April 2024.

⁶ Welsh Government [Internal Audit Service Report NICW](#), Jan 2025.

⁷ Welsh Government [Internal Audit Service Report NICW](#), Jan 2025.

- succession planning has been considered appropriately;
- membership is diverse;
- the remit letter provides a clear steer;
- Commissioners have been proactive in their approach; and
- declarations of interest are considered and managed appropriately.

10. The six issues raised in the review report are that:

- the Commission's strategic approach does not define the strategy for achieving success or targets to allow evaluation of performance;
- there are no performance metrics to support performance updates;
- there are no lessons learnt exercises on Commission reporting;
- risk management arrangements require enhancement;
- there are no terms of reference to support Commissioner meetings; and
- verbal updates at meetings impact on the ability to provide robust scrutiny and challenge of the Commission.

11. The Commission responded to the review in a letter to the Cabinet Secretary.⁸ Giving evidence to the Committee Dr. Clubb stated:

*"They've made a number of recommendations, most of which we've already implemented ... I think we received a reasonably clean bill of health for our first audit, and hopefully, we can put in place improvements to the processes to make sure that, next time, it's full green rather than light green."*⁹

12. The Committee suggested to Dr. Clubb that the review "felt more like an audit than a comprehensive review ... very much through a sort of auditing lens rather than a review of what you do."¹⁰

13. Dr. Clubb commented:

⁸ NICW: [Letter to the Welsh Government](#), 24 February 2025.

⁹ CCEI Committee, [20 February 2025](#), paragraph 40.

¹⁰ CCEI Committee, 20 February 2025, [Record of proceedings](#), 20 February 2025 paragraph 47.

“a review of what we do would probably be more of a political choice, because that would then inform the remit or the terms of reference. if we call it an audit, it's a clean bill of health on how this organisation is operating. And then come May next year, there'll be a new Minister, up to them to take a view ... So, I think it did its job as part of what will be a process that concludes, probably, in May or June next year.”¹¹

Monitoring of outcomes

14. The Commission says if it is functioning effectively, it will see the following outcomes, which were set out in a previous annual report:

- future policy that improves the capture of wealth from renewables, that better manages land for various infrastructure uses, and that builds on a better understanding of local community perspectives;
- future policy and practice is better informed about ways to minimise the impact of flooding on Wales’ communities and infrastructure;
- the Commission and other stakeholders are better informed about how to communicate long-term risks to communities most vulnerable to climate change impacts;
- the Commission’s activities and recommendations are better informed by a wide and diverse range of stakeholders; and
- an enhanced profile and reputation for the Commission.¹²

15. The Commission’s latest annual report provides a summary of its performance to date against these outcomes.¹³

16. In last year’s report, we concluded that it was too early to determine how the Commission’s work is influencing Welsh Government thinking. Since then, the Welsh Government has published its response to the Commission’s report on renewable energy whilst the Commission now awaits the government response to its report on flooding.

¹¹ CCEI Committee, [Record of proceedings](#) 20 February 2025, paragraph 48.

¹² NICW [Annual report 2021/22](#), November 2022.

¹³ NICW [Annual Report 2024](#), December 2024.

17. The Commission has established a process to monitor the uptake of its recommendations.¹⁴ The Welsh Government review has, in turn, suggested some improvements (as referenced above) including the introduction of performance metrics to support performance updates and lessons learnt exercises on Commission reporting.

Term of office

18. In our last report, we recommended that:

“As part of the Welsh Government’s review of the Commission’s status role and objectives, it should consider the case for extending the term of appointment for Commissioners so that it is better aligned with those of other public appointees.”¹⁵

19. Having considered this matter, the Government reported:

“Wales has four Commissioners appointed by the First Minister. All are appointed on a fixed seven-year term, have statutory powers and have formalised funding and governance arrangements. As a non-statutory advisory body, the National Infrastructure Commission for Wales does not have the same funding or governance arrangements, with a standard term of office of 3 years.”¹⁶

20. The Welsh Government review drew benchmarking parallels with other Welsh Government advisory bodies and panels, such as the Agricultural Advisory Panel for Wales, without reaching any firm conclusions. It noted that some of these bodies have an option for a second term of office and suggested that “it seems reasonable to extend the period of office”, although this should be accompanied by “strengthened performance management arrangements.”¹⁷

21. For their part, the Commission said:

“We see the merit in having a ‘rolling succession’ of Commissioners where some experience stays within NICW after

¹⁴ NICW: [Our impact – The National Infrastructure Commission for Wales](#).

¹⁵ Climate Change, Environment and Infrastructure Committee, [Annual scrutiny of the National Infrastructure Commission for Wales: 2023](#), April 2024.

¹⁶ Welsh Government [Internal Audit Service Report National Infrastructure Commission for Wales](#), Jan 2025.

¹⁷ Welsh Government [Internal Audit Service Report National Infrastructure Commission for Wales](#), Jan 2025.

a set of Commissioners depart. For example, we have one Commissioner at present who was a member of the previous Commission. The move to a 4-year election cycle from the next Senedd term makes it reasonable to suggest moving to a 4 years + 4 years term of office for Commissioners, supported by enhanced performance management arrangements.”¹⁸

The future of the Commission

22. The current Commission was originally appointed for a three-year term from 2021-22 to 2024-25. In November 2024, the Welsh Government announced an extension to the current Commissioner’s appointments to December 2025 to allow the Commission to “complete its current work programme”.¹⁹

23. Reflecting this period of uncertainty, Dr. Clubb told the Committee:

“We are mindful of our current appointments coming to an end in December this year. What I’m very keen to do is to avoid everybody leaving at once, which is almost what happened last time, so we’re encouraging some people that want to, to stay on, and giving the opportunity to others to leave.

“I still don’t know quite what’s going to happen with my own term. I’ve had some suggestion it might be helpful for me to stay on until after the election next year to provide continuity of leadership. I’m not quite sure what’s going to happen there, but I can assure the Members here that we will be putting in place, in good time, a recruitment process, to ensure that, whatever happens, there will be continuity—so, we will have existing commissioners; we will have new commissioners.”

24. The non-statutory nature of the Commission and the approaching Senedd elections in 2026 add further uncertainty.

25. In her letter to the Committee, the Cabinet Secretary refers to the Committee’s previous recommendations and the observations made by the review including on the Commission’s status, remit, and objectives. She states:

¹⁸ NICW: [Letter to the Welsh Government](#), 24 February 2025.

¹⁹ Welsh Government: [Written Statement: National Infrastructure Commission for Wales – Extension of Appointments](#), November 2024.

“...these will require further consideration as they go to the remit of NICW and its longer-term work programme and I will respond in due course on these. In coming to a view on this, I would like to hear the Committee’s own thoughts on these issues.”²⁰

26. The Committee asked the Chair about relationships with the UK National Infrastructure Commission. Dr. Clubb said that the two commissions had a positive relationship, evidenced by the holding regular meetings and of the UK Commission having sat on advisory groups for the renewable energy and flooding reports.²¹

27. The UK National Infrastructure Commission is itself in a state of flux as the UK Government plans to merge the Commission with the Infrastructure and Projects Authority to create a new National Infrastructure and Service Transformation Authority (NISTA).²²

Funding of the Commission

28. Since 2022-23, the Commission has been allocated an annual budget of around £400,000. The same figure has been allocated as part of the Welsh Government’s 2025-26 draft budget.²³

29. In its review, the Government states that “consideration could be given to agreeing Commission funding for the term of the Government to ensure alignment with the Remit letter”.²⁴

30. Responding to that review, the Commission said:

“NICW recently received early assurances of funding for 2025/26 which means that we can begin planning our projects in good time. We request that this good practice is continued in future years to enable NICW to plan and procure work in a timely manner.”²⁵

²⁰ Welsh Government: [Letter from Cabinet Secretary for Economy, Energy & Planning](#), Jan 2025.

²¹ CCEI Committee, [Record of proceedings, 20 February 2025](#), paragraph 33.

²² UK Government [New body to “get a grip” on infrastructure delays](#), October 2024.

²³ Welsh Government: [Evidence paper on Draft Budget 2025-26](#) Jan 2025.

²⁴ Welsh Government [Internal Audit Service Report NICW](#), Jan 2025.

²⁵ NICW: [Letter to the Welsh Government](#), 24 February 2025.

Managing conflicts of interest

31. In last year's report, the Committee recommended that:

*"The Commission should commit to ensuring that the requirement for Commissioners to remove themselves from discussions or decisions where a conflict of interest, or a perceived conflict of interest might arise is being met consistently. It should also commit to ensuring that appropriate arrangements are in place to monitor compliance with the requirement."*²⁶

32. Responding to that recommendation, the Chair of the Commission wrote to the Committee to set out that:

*"The Commission has taken significant steps in recent months to increase its transparency about conflicts or perceived conflicts of interest. This includes updating its online register on both the Welsh Government and NICW websites. The NICW website includes each Commissioner's declared interests on their personal biography pages. At each meeting, new conflicts of interest are recorded in the meeting notes, which are published online on approval. Commissioners are asked to identify any perceived conflicts on the agenda for all meetings and are asked to withdraw from the meeting for items which carry a risk of perception of conflict of interest. This is recorded in the minutes of the meeting."*²⁷

33. Dr David Clubb reiterated in his evidence that, as set out in the Welsh Government review, "we were judged to be dealing with conflicts of interest appropriately."²⁸

34. The Welsh Government's internal audit service report found that "declarations are considered and managed appropriately."²⁹

²⁶ CCEI Committee, [Annual scrutiny of the National Infrastructure Commission for Wales: 2023](#), April 2024.

²⁷ NICW: [Response to the CCEI Committee report on the annual scrutiny of NICW 2023](#), May 2024.

²⁸ CCEI Committee, [Record of proceedings, 20 February 2025](#), paragraph 29.

²⁹ Welsh Government [Internal Audit Service Report NICW](#), Jan 2025.

Independence

35. Whilst the Commission is remitted to “determine independently its work programme, methodologies and recommendations, as well as the content of its reports and public statements”³⁰, the Commission is appointed and funded by, and receives administrative support, from the Welsh Government. Commenting on how the Commission manages these tensions, Dr. Clubb said:

“Welsh Government pays for us to operate, and therefore you need to have confidence that we can make a robust challenge to Welsh Government on any issues. ... we push back where we feel that Welsh Government is not listening to us... for example, on issues with renewable energy, where we think that they haven't responded satisfactorily. So, you'll see evidence in our correspondence that we keep trying to go back to them. We set our programme of work independently, particularly now, because the original remit set out expectations for the first two years.”³¹

Timescales for responding to reports

36. At the time of our last scrutiny session, the Commission was still waiting for a response to its first major report, *Preparing Wales for a Renewable Energy 2050* which had been published in October 2023.³² The Welsh Government responded to the report in May 2024.

37. In our last report, we recommended that:

“The Welsh Government must review its timeframe for responding to the Commission's reports. It should consider adopting a response time of between 6 weeks and 3 months, so that it is more aligned with the response time for reports by Senedd committees and the Independent Environmental Protection Assessor for Wales.”³³

38. In its response, the Welsh Government said that “a response time of between 6 weeks and 3 months is not unreasonable but the most workable approach

³⁰ Welsh Government, [NICW remit letter](#) April 2022.

³¹ CCEI Committee, [Record of proceedings, 20 February 2025](#), paragraph 22.

³² NICW: [Preparing Wales for a Renewable Energy 2050](#), October 2023.

³³ CCEI Committee, [Annual scrutiny of the National Infrastructure Commission for Wales: 2023](#), April 2024.

might be for the response deadline to be discussed with the relevant Welsh Government teams on an individual report basis.”³⁴

39. In his oral evidence, Dr. David Clubb again referred to the frustrations around the timescales for the Welsh Government to respond to the Commission’s recommendations, even within agreed timescales. Recent changes of ministerial portfolios delayed things still further, as Dr. Clubb explained:

“our recommendations were published in October 2023, and it’s then basically a year before we have any kind of traction.”³⁵

The Commission described the impact of slow government responses to their recommendations:

“we were frustrated with some of the delays that we saw within Welsh Government policy ... if you don’t act on them fairly quickly, then the urgency is gone, and the opportunity then is lost as well.”³⁶

40. This is a point that was referenced in the government audit, which stated:

“There was a consensus across report recipients that response timeframes of 6-12 months are too long and may impact the relevance of report recommendations.”³⁷

41. Responding to the Welsh Government audit the Commission stated:

“We consider that responding in a timely manner is as important as the appetite for the Welsh Government for challenge from our recommendations. Mandating a shorter or longer timeframe for response would be secondary to ensuring a perception across Welsh Government that our contributions are helpful and an important part of a process intended to support delivery of good quality, resilient infrastructure in Wales.”³⁸

³⁴ Welsh Government [Internal Audit Service Report National Infrastructure Commission for Wales](#), Jan 2025.

³⁵ CCEI Committee, [Record of proceedings, 20 February 2025](#), paragraph 25.

³⁶ CCEI Committee, [Record of proceedings, 20 February 2025](#), paragraph 26.

³⁷ Welsh Government [Internal Audit Service Report National Infrastructure Commission for Wales](#), Jan 2025.

³⁸ NICW: [Letter to the Welsh Government](#), 24 February 2025.

Our view

The National Infrastructure Commission for Wales is a body that is created, funded, and appointed by the Welsh Government. The Committee is, therefore, perplexed by what has appeared to be a rather non-committal attitude towards the Commission and its work. The delay in responding to reports, the narrowly focused review, and the uncertainty regarding the budget and Commissioners' roles into next year raise questions about the Government's commitment to the Commission's future.

Timescales for Government responses to the Commission

Last year, we recommended that the Government should review the timescales for responding to the Commission and consider adopting a response time of between 6 weeks and 3 months. The Government has carried out this review but has failed to come to a conclusion. This is not satisfactory. We remain of the view that the Commission's recommendations should be responded to within fixed timescales commensurate with Senedd Committees and the interim Independent Environmental Protection Assessor for Wales. Specifically, given the pertinence of the issues around flooding to the people of Wales, the flooding report should be responded to with the urgency that the seriousness of the issues would suggest.

The future of the Commission

Last year, this Committee made a number of recommendations on the future of the Commission. Central to these recommendations was that *"the Welsh Government must deliver on its commitment to undertake a comprehensive review of the Commission's status, role and objectives before the end of 2024."*

The resulting Internal Audit Service report appears to have been carried out diligently and has made a number of helpful suggestions for improvement, many of which are already being implemented by the Commission. Noting the timetable set out, it would be appropriate for the Commission to provide an update to the Committee on the implementation of these recommendations at six and twelve month intervals (in August 2025 and March 2026).

However, the report has not led to any firm conclusions around the status, remit, objectives, or funding of the Commission. In the view of the Committee, a review that fails to draw any conclusions on these major issues cannot be considered to be comprehensive. As a result, the Commission is still in the

position of having no idea about its short-term future, let alone in the medium term.

As the letter from the Cabinet Secretary states, these issues require further consideration. With Senedd elections on the horizon, a decision point is imminent. The Welsh Government needs to consider whether the Commission is now strengthened with adequate resources and powers to undertake its role and whether this should include the national assessment of Wales' infrastructure needs for the coming decades. Pending such decisions, the Government should remove the short-term uncertainty around the Commission's work by extending terms of office of the Chair and the other commissioners to the other side of the 2026 Senedd elections.

Recommendation 1. The Welsh Government must bring to a conclusion its, review of the Commission by making firm recommendations on the status, role, and objectives of the Commission for the future.

Recommendation 2. The Government should remove the short-term uncertainty around the Commission's work by extending terms of office of the Chair and the other commissioners to the other side of the 2026 Senedd elections.

Recommendation 3. The Welsh Government must agree a specific timescale to respond to Commission reports. In our view, it should consider adopting a response time of between 6 weeks and 3 months, so that it is more aligned with the response time for reports by Senedd committees and the Independent Environmental Protection Assessor for Wales.

Recommendation 4. The Welsh Government should conclude its consideration of the Committee's previous recommendation that it should consider the case for extending the term of appointment for Commissioners, so that it is better aligned with those of other public appointees.

Recommendation 5. The Welsh Government should, as part of concluding its consideration of the Commission's status, agree funding for the term of the Government to ensure alignment with the remit letter.

Recommendation 6. The Commission should provide an update to the Committee on the implementation of the audit recommendations in August 2025 and March 2026.

2. The Commission's work programme

Response and impact of the renewable energy report

42. The first year of the Commission's work programme focused on its renewable energy project. It published its first major report on *Preparing Wales for a Renewable Energy 2050* in October 2023 and made 11 recommendations to the Welsh Government.³⁹

43. At the time of our last scrutiny session with the Commission, the Welsh Government had yet to respond. Dr. Clubb suggested to us that:

"they're struggling a bit with possibly some of our recommendations, which, for me, is a good thing. If we don't cause challenge and we don't cause people to struggle and perhaps change the way they're thinking, then we're not doing our job properly."

44. The Welsh Government responded to the renewable energy report in May 2024. The Commission has summarised the Welsh Government's response against each of the Commission's recommendations.⁴⁰

45. In July 2024, the Commission wrote to the Welsh Government providing feedback on the response and stated its "overriding concern is the apparent lack of urgency in amending policies or regulations which lie wholly within the ambit of the Welsh Government".⁴¹ The Welsh Government provided a response to the Commission's letter in July 2024.⁴²

46. In his evidence to the Committee, Dr. Clubb was frank about these frustrations in influencing Government policy:

"We're a little bit frustrated, and I think there are still things we would want to see. So, for example, we said, 'What's Welsh Government's vision for renewable energy by 2050?' That was something that came up consistently with stakeholders. They want to understand, are we going to be a net energy exporter, what's our view on ownership, what role is community energy

³⁹ NICW: [Preparing Wales for a Renewable Energy 2050](#) Oct 2023.

⁴⁰ NICW: [Recommendation tracker](#).

⁴¹ NICW: [Letter to the Welsh Government](#), July 2024.

⁴² Welsh Government: [Letter to NICW](#) July 2024.

going to play, how much installed capacity is there going to be, what's your view on grid? And, really, we didn't see that; we haven't seen that.”⁴³

47. The first recommendation of the renewable energy report was:

“By 2025, the Welsh Government should present a vision for energy in Wales to 2050, with an accompanying strategy and action plan to set out its long-term ambition. ...The implementation of this vision should be overseen by a cross-government / sector group, chaired by the Minister.”

48. The Welsh Government accepted this recommendation stating that:

“We will use our energy planning evidence to develop a National Energy Plan for Wales by the end of 2024.”⁴⁴

49. Dr. Clubb told the committee:

“That wasn't produced, and there's a rationale for that, which we accept, But nonetheless, we still feel that there's a role for a vision that hasn't been outlined. So, I think that that's still something we would want to push on.”⁴⁵

50. Dr. Clubb also made reference to another recommendation from the report to enable greater community ownership from renewable energy:

“Does Welsh Government want greater levels of ownership? To what extent is ownership of energy important? Those things, for me, would feel very reasonable to implement—high-level ideas on how much electricity should be generated and owned by Wales. We said, ‘why not make ownership of projects a material consideration in the planning?’ Well, aspects like that weren't really responded to, and we said, ‘Well, community ownership and local ownership should both be components.”⁴⁶

⁴³ CCEI Committee, [Record of proceedings, 20 February 2025](#), paragraph 27.

⁴⁴ Welsh Government: response [Preparing Wales for a Renewable Energy 2050 report](#), June 2024.

⁴⁵ CCEI Committee, [Record of proceedings, 20 February 2025](#), paragraph 27.

⁴⁶ CCEI Committee, [Record of proceedings, 20 February 2025](#), paragraph 62.

Response and impact of the flooding report

51. The Commission was asked by the Welsh Government to “conduct an assessment of how the nationwide likelihood of flooding of homes, businesses and infrastructure can be minimised by 2050”. It published this report, including 17 recommendations for the Welsh Government, in October 2024.⁴⁷ The Commission is currently awaiting the Welsh Government’s response to its recommendations.

52. The Commission said that they had also engaged with the Welsh Government on their Climate Adaptation Strategy⁴⁸, commenting that:

“flooding is an important aspect of their strategy. And lots of recommendations, I think, within the Welsh Government’s strategy align with ours, around the integration of nature-based solutions, the establishment of long-term resilience plans, as well.”⁴⁹

53. The Committee is undertaking an inquiry into storm preparation and responses, following the severe impacts of Storm Bert and Storm Darragh in late 2024. Oral evidence from the Commission will inform that inquiry.

54. The Welsh Government review stated that:

“anecdotal evidence suggests the Welsh Government response to the 2024 Flooding Report has been more positive than the response to the 2023 Renewable Energy Report. Discussions with Commissioners indicated changes were made in the approach to the development and launch of the Flood Report to ensure it had greater impact.”⁵⁰

55. Asked about the likely response of the Welsh Government, Eluned Parrott commented:

“It is difficult because we haven’t had a formal response. We’ve had some conversations where we’re talking about some of the individual, specific things in more detail ... The thing that I would say is that it’s some of the bigger ticket items that are harder,

⁴⁷ NICW: [Building Resilience to Flooding in Wales by 2050](#), October 2024.

⁴⁸ Welsh Government [Climate adaptation strategy for Wales](#), October 2024.

⁴⁹ CCEI Committee, [Record of proceedings, 20 February 2025](#), paragraph 188.

⁵⁰ Welsh Government [Internal Audit Service Report NICW](#), Jan 2025.

sometimes, to justify or to deliver, particularly as, obviously, we're running into a not-quite-full political year, and it's difficult to make decisions at this kind of time."⁵¹

Current work on climate communication

56. The Commission's focus for the current year is on climate communication.⁵² The Commission says it will publish its findings and report in autumn 2025.

57. The project is comprised of two research workstreams – engaging communities and resilient infrastructure.

58. The engaging communities workstream will explore how different communities can engage with decision making around infrastructure development and climate adaptation.

59. The resilient infrastructure workstream will review how climate change considerations within infrastructure planning and provision are considered from the perspective of both maintaining existing infrastructure and the development of new infrastructure.

60. Dr. Clubb said that the project was nearing completion:

*"We aimed at trying to get feedback from communities who aren't usually part of the conversation about climate change, and to try and find out whether there are things that we can learn by working with communities, to help the Welsh Government or other public bodies to understand how better to communicate with people to talk about climate change in the long term."*⁵³

61. He continued:

"The other part of the project relates to whether the infrastructure sector is sufficiently prepared for climate change in the long term ... We feel that, generally, there's a gap between the understanding of communities and policy, and how can we fill that gap or bring them together and help people generally

⁵¹ CCEI Committee, [Record of proceedings, 20 February 2025](#), paragraph 208.

⁵² NICW: [Climate Communication](#).

⁵³ CCEI Committee, [Record of proceedings, 20 February 2025](#), paragraph 79.

know more about climate change and policy? That's what the project is trying to do.”⁵⁴

Final year project on futures infrastructure assessment

62. The UK National Infrastructure Commission is required to carry out an overall assessment of the UK’s infrastructure requirements once every five years. Its second assessment makes a series of recommendations to the UK Government.⁵⁵

63. In last year’s report, the Committee recommended that:

“the Welsh Government should consider whether there is merit in requiring the Commission to undertake a national infrastructure assessment (comparable to that of the assessments undertaken by the UK National Infrastructure Commission).”⁵⁶

64. The Chair of the National Infrastructure Commission for Wales has discussed infrastructure assessments with counterparts in the New Zealand Infrastructure Commission (population comparable in size to Wales) who confirmed the cost of carrying out their comprehensive infrastructure assessment was in the region of £2.5m.

65. The Government’s review states:

“In the current financial climate, there is unlikely to be appetite for a comprehensive infrastructure assessment for Wales; any such decision would require considerable additional resource and would need to be considered alongside structural changes to the Commission’s status and remit.”⁵⁷

66. In this context, the Commission states in its annual report that it is:

“looking to undertake a [final year] piece of work with different infrastructure sectors on what is likely to be the major issues for the industry over the next 80 years.”⁵⁸

⁵⁴ CCEI Committee, [Record of proceedings, 20 February 2025](#), paragraph 80.

⁵⁵ National Infrastructure Commission, [The Second National Infrastructure Assessment](#), Oct 2023.

⁵⁶ CCEI Committee, [Annual scrutiny of NICW: 2023](#), April 2024.

⁵⁷ Welsh Government [Internal Audit Service Report NICW](#), Jan 2025.

⁵⁸ NICW [Annual Report 2024](#), page 24.

67. The Commission describes this work as a “futures infrastructure assessment” and says it will “present the Welsh Government with these findings and recommend a work programme” for the next Commission.

68. Dr. Clubb explained to the Committee that even within its existing restraints:

“We can still provide a lot of value by taking a snapshot of particular sectors and then trying to rank those within some sort of priority for our investigations over the coming years.”⁵⁹

69. The Government’s audit report described the approach as “a pragmatic solution... with the outcomes used as a basis for determining if a larger exercise would be appropriate and provide value for money for the Welsh Government.”⁶⁰

Our view

The Commission has continued to produce challenging and worthwhile reports, making both useful recommendations to the Government and providing thoughtful contributions to the wider policy discussions on future infrastructure. That it has continued to do so within the constraints of limited resources is in large part due to the energy and commitment of the Commissioners.

It has continued to pursue the recommendations of last year’s renewable energy report, with a succession of government ministers whilst pursuing its programme of visits, publishing thoughtful and provocative contributions through its series of blog pieces.

Last year, the Committee highlighted the need to improve the Commission’s public engagement. It is evident that it has developed its programme of communication and engagement and is increasingly well regarded by its external stakeholders, as evidenced by the Welsh Government’s review.

The Commission has delivered its major undertaking this year, its report on Building Resilience to Flooding in Wales and continued to work on its current climate communication project. The Committee looks forward to seeing the outputs of that work later in the year.

Nevertheless, the principal aim of the Commission is to provide “radical, challenging and evidence-informed advice and guidance to ...Welsh Government, that will inform and future-proof decisions on infrastructure

⁵⁹ CCEI Committee, [Record of proceedings, 20 February 2025](#), paragraph 95.

⁶⁰ Welsh Government [Internal Audit Service Report NICW](#), Jan 2025.

deployment from 2030–2100.”⁶¹

The Commission has delivered on the first, however we have not seen evidence that its advice is informing or future-proofing Welsh Government decisions. Without this, the Commission will not have the impact that should be expected.

Whilst the Commission has not been given the resources sufficient to carry out a national infrastructure assessment commensurate with that undertaken by its UK counterpart, it has sought to develop an approach to this work that could present the beginnings of a work programme for the next Commission. The Committee remains of the view that there is merit in undertaking such an infrastructure assessment.

Recommendation 7. The Welsh Government should provide a timeline for the delivery of the commitment to produce a National Energy Plan for Wales, as set out in its response to the NICW report on renewable energy.

Recommendation 8. The Welsh Government should ensure that there is a timely and substantive response to the Commission’s 2024 flooding report.

Recommendation 9. The Welsh Government should commit to responding to the climate communication report before the end of this Senedd term.

Recommendation 10. The Commission should continue to monitor and follow up with the Welsh Government the implementation of its recommendations from its renewable energy report.

⁶¹ NICW [Annual Report 2024](#), December 2024.