

# A NATIONAL INFRASTRUCTURE COMMISSION FOR WALES CONSULTATION RESPONSE FORM

Please note responses are required by 9 January 2017. Responses can be sent to:

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**Question 1:** Do you agree that NIFCW's remit and output should consist of analysis, advice and recommendation to the Welsh Ministers?

Natural Resources Wales (NRW) agrees that it would be useful for the National Infrastructure Commission for Wales (NIFCW) to analyse, advise and make recommendations to Welsh Ministers on Wales's longer-term strategic infrastructure needs. However, further clarity will be required in relation to the scope and definition of Infrastructure and how the role complements work undertaken by other public bodies or under other processes.

For example, the emerging National Development Framework (NDF) will set out the Welsh Government's land use priorities by identifying key locations to accommodate change and infrastructure investment over a 20 year period. The preparation of the NDF will be supported by a Strategic Environmental Assessment to identify significant environmental effects, and measures to mitigate adverse effects, and enhance positive effects. The Welsh Government is currently [calling for evidence](#) that can help develop the NDF. This includes seeking evidence on national issues that could be addressed in the NDF e.g. areas for growth, and new infrastructure requirements. It will be useful to understand how the NICW will support this work undertaken as part of the NDF which is to understand the infrastructure needs of Wales, and where they may be best accommodated.

Additionally, the Welsh Government has recently [consulted](#) on the establishment of a new Flood and Coastal Erosion Committee to replace the current Flood Risk Management Wales Committee. The new Flood and Coastal Erosion Committee will

advise Welsh Ministers on matters relating to flood and coastal erosion risk management, and may oversee and set direction for flood risk management programmes. Further clarity will be required on the interaction of NIFCfW with the Committee. For example, clarity on whether the NIFCfW provide facilitate co-working across interested flood risk management priorities, and/ or consider flood risk asset management.

**Question 2:** Do you agree that NIFCW's remit should extend to non-devolved as well as devolved infrastructure?

We note that the responsibility for making investment decisions for infrastructure that is devolved will rest with the Welsh Ministers and with the UK Government for infrastructure that is non-devolved. However, we recognise that certain infrastructure, including environmental infrastructure, will be cross-border in nature and therefore it may be useful for NIFCfW to consider these aspects to ensure decisions align with Welsh Government objectives and priorities. To facilitate this process, greater clarity will be required to explain the inter-relationship between the NIFCfW and the UK Government's Infrastructure Commission in advising Welsh Ministers and the UK Government on devolved and non-devolved infrastructure.

It would also be helpful if the establishing remit or charter of the NIFCfW could clearly set out the types of infrastructure (devolved and non-devolved) for which the NIFCfW will provide advice and analysis to Government, and the types of infrastructure in Wales for which the UK's National Infrastructure Commission will provide a similar service.

The consultation document indicates that the NIFCfW's remit will include 'environmental infrastructure'. It will be helpful to further clarify what forms of infrastructure is captured under this term, and its interrelationship with environmental infrastructure addressed within the emerging Natural Resources Policy, the National Development Framework and the Wales National Marine Plan .

Natural Resources Wales' [State of Natural Resources Report](#) September 2016) provides a national evidence base for Wales on how we are managing our natural resources and ecosystems and outlines the host of multiple benefits for well being derived from Wales's natural resources including:

- £385 million from agriculture to the Welsh economy every year
- 951 million litres of drinking water per day
- 1.5 million tonnes of green timber a year, making construction easier and cheaper
- £499.3 million from woodlands each year
- 14 million tonnes of aggregates per year, for construction and other uses
- 8,919 gigawatt hours of energy from renewable sources, and rising, creating a renewable energy industry that employs 2,000 people

- 410 million tonnes of carbon stored in soil to soak up emissions and protect against climate change
- £2,870 million in tourism to Wales
- 28% of adults meeting the recommended level of physical activity through outdoor pursuits
- £18.2 million in health benefits to people from walking the Wales Coast Path
- £840 million and 30,000 jobs from the historic environment sector.

The Report also consider pressures on Wales' natural resources are resulting in risks and threats to long-term social, cultural, environmental and economic well-being, as well as opportunities for integrated solutions that provide multiple benefits.

In light of the multiple benefits and services derived from and provided by Wales's natural resources, it should be an integral component of the NICW's work. Such an approach will be consistent with the stated aim for the NICW to operate in accordance with the principles of the Well-being of Future Generations (Wales) Act 2015.

NRW would welcome an opportunity to meet to discuss how best to integrate SoNaRR with the work of the NIFCfW.

**Question 3:** Do you agree that NIFCfW should not advise on programmes and work that have already been decided, or will be decided in the immediate future, by statutory and regulatory bodies?

In order to ensure certainty for the delivery of existing commitments, it seems reasonable that the NIFCfW should not advise on programmes and work that have already been decided, or will be decided in the immediate future, by statutory and regulatory bodies.

**Question 4:** Do you agree that NIFCfW should be able to at cross-cutting delivery issues if it considers them a barrier to delivering infrastructure needs, including governance, costs, financing and programme/project management methodology? Please specify any other delivery issues that you consider NIFCfW should be able to look at and the reason.

It may be useful to analyse and advise on infrastructure in an integrated way, taking interdependencies into account, and maximising opportunities for the delivery of multiple benefits. For example, strategic investment in our green infrastructure can improve the resilience of conventional 'grey' infrastructure, for example by mitigating the effects of flood risk and climate change, whilst also supporting the delivery of better known benefits usually associated with green infrastructure such as opportunities for ecological connectivity and outdoor recreation.

Such an integrated approach will be consistent with the stated aim for the NIFCfW to operate in accordance with the ways of working and principles of the Well-being of Future Generations (Wales) Act 2015.

**Question 5:** Do you agree that NIFCfW should engage closely with and consult other bodies that may have an economic and environmental infrastructure remit? Who do you think are the key bodies that NIFCfW should engage with and consult?

We would welcome the opportunity to work with the proposed NIFCfW, and would welcome early engagement so that we can describe our various roles (including as advisor, regulator, land-manager, and a body that delivers infrastructure), our ways of working, the progress of projects which may be of interest to the NIFCfW together with the range of bodies with whom NRW currently engage with and consult.

**Question 6:** Do you agree that NIFCfW's remit should extend to participating in other relevant strategic advisory fora, such as the Council for Economic Renewal? Please specify any other forum you consider NIFCfW should participate in and the reason.

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NRW note that whilst the NIFCfW's remit does not extend to social infrastructure, it does extend to providing advice on the interaction between economic and environmental infrastructure and social infrastructure. To help ensure integration NRW agree that the NIFCfW's remit should extend to participating in other relevant strategic advisory fora. For example, please see our comments in Question 1 on the interaction with the proposed new Flood and Coastal Erosion Committee

**Question 7:** Do you agree that the Welsh Government should undertake and publish a review of NIFCfW's status and remit before the next Assembly election in 2021?

No comment.

**Question 8** Do you agree that NIFCfW should work collaboratively with the UK National Infrastructure Commission where relevant?

A collaborative approach would be useful to consider cross-boundary, non-devolved and interdependent matters. For example in considering the relationship between energy generation and grid infrastructure, as well as infrastructure in marine waters. Please see also our response to Question 2 above.

**Question 9:** Do you agree that NIFCfW members should be appointed by virtue of their expert knowledge and experience?

To ensure integration with the Natural Resources Policy, the Wales National Marine Plan, the National Development Framework and the application of the ways of working and principles of the Well-being of Future Generations (Wales) Act 2015, NRW would advise on the need for the NIFCfW membership to include expert knowledge and experience of natural resource management and environmental infrastructure.

**Question 10:** Do you agree that all appointments to NIFCfW should be made through an open public appointments exercise?

No comment.

**Question 11:** How do you think we should promote this public appointments process to under-represented groups?

No comment.

**Question 12:** Do you agree that NIFCfW should be able to commission targeted research? Please identify any specific research you think NIFCfW should commission as a priority in order to best inform its work, and explain why.

No comment.

**Question 13:** Do you agree that NIFCfW should publish an annual report on its work? What factors do you think might require reports to be published more than once a year?

No comment.

**Question 14:** Do you agree that NIFCfW should hold public meetings in North, Mid, South and West Wales to explain and promote its role?

No comment.

Your name/organisation and postal/email address

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We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

None.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: