Annual scrutiny of the National Infrastructure Commission for Wales: 2023

April 2024

1. Introduction

- 1. At the start of the Sixth Senedd, the Climate Change, Environment and Infrastructure Committee (the Committee) agreed to undertake annual scrutiny of the National Infrastructure Commission for Wales (the Commission).
- **2.** This is the Committee's second report on the Commission. It focuses on the Commission's <u>Annual report 2022-23</u> and builds on the views expressed in our <u>first report</u> (March 2023).
- **3.** On <u>31 January 2024</u>, the Committee held a scrutiny session with Dr David Clubb, Chair of the Commission, and Dr Jenifer Baxter, Deputy Chair. We are grateful for their attendance and on-going co-operation.



2. Role, remit and ways of working

- **4.** The Commission was established in 2018 as an independent, non-statutory advisory body to the Welsh Ministers. Its purpose is to assess the economic and environmental infrastructure needs of Wales over the next 5-80 years.¹
- **5.** The current Commission has been appointed for a three-year term from 2021-22 to 2024-25. It is <u>comprised</u> of the Chair, a Deputy Chair and six Commissioners, making it smaller in size than its predecessor, which totalled 12 members. Secretariat support is provided by Welsh Government officials.
- **6.** The <u>Commission's remit letter</u> was issued in April 2022 and covers this term of Government. It sets out two specific areas for the Commission to focus on: renewable energy; and flooding and climate change resilience.

Independence

7. During previous scrutiny of the Commission, the Committee questioned Dr Clubb on the Commission's independence from the Welsh Government. The Committee pursued this matter further in its latest scrutiny session. Dr Clubb reiterated that, although the Commission is funded by the Welsh Government, it is "completely independent". He explained:

"we have editorial independence in that, everything that we say and that we do, we manage ourselves...we're sometimes aware of Welsh Government opinion, which is fed to us through various channels. We don't bend to accommodate that opinion."

8. The Committee asked Dr Clubb whether the Commission's role could be delivered by a civil service department in the Welsh Government. While Dr Clubb acknowledged it would be possible for the Commission's objectives to be delivered 'in-house', he drew attention to the benefits of independence. He said, the Commission is not "subject to all of the culture of Government" or to "ministerial diktat". Dr Clubb asserted, "we think that we fulfil a role that is distinct from [the Welsh Government]".

¹ When the Commission <u>was first established</u>, its focus was on infrastructure needs over a 5-30 year period. Following a recommendation by Dr Clubb, Chair of the current Commission, the Welsh Government amended the Commission's Terms of Reference to extend this to a 5-80 year period.

Managing potential conflicts of interest

- 9. In November 2023, it was <u>reported in the media</u> that concerns had been raised with the Welsh Government over a Commissioner's involvement with a public affairs agency whose recent clients had included renewable energy developers. The media report referenced the fact the Commissioner in question had given evidence to inform the Committee's scrutiny of the Infrastructure (Wales) Bill.
- **10.** When questioned by the Committee on the above, Dr Clubb suggested the article was "[not] entirely objective" and "was [not] trying to portray a completely balanced view". He explained the issue had been investigated, adding "as far as I'm concerned, [the Commissioner] has been cleared. There's no problem with him or anyone else".
- 11. Dr Clubb asserted the Commission "would struggle probably to find people with a wide variety of skills if you decided to rule them out on the basis of any interest that they'd had in the past or any potential future conflict". He added, "I wouldn't have been able to be appointed had my interests in renewable energy or any of the other things that I work on been seen as a blocker".
- 12. Dr Clubb reiterated that Commission members are required to remove themselves from discussions or decisions where a conflict of interest, or a perceived conflict of interest may arise. For instance, Dr Baxter explained she had led on the Commission's work on renewable energy due to Dr Clubb's role at Afallen. Dr Clubb also provided an example of where he had absented himself from a meeting in Milford Haven attended by renewable energy developers.
- **13.** Dr Clubb explained the register of interests for Commissioners, which is <u>published online</u>, is updated as and when changes occur. He said this goes further than the regulatory requirement for an annual update and suggested this "goes way beyond existing good practice".

Term of appointment

14. The Committee asked Dr Clubb whether a three-year term of appointment is sufficient when chairing an organisation looking to the future. He said he did not consider it problematic, adding "I don't think it's out of line with standard practice in most other regulated public bodies". Notwithstanding this, Dr Clubb said he is likely to request a "slight extension" to his appointment, and to that of other

Commission members, to ensure the Commission can complete its work programme.

15. Dr Clubb explained he could, in theory, reapply for appointment, but added, "I'm quite interested in the idea of other people with new ideas coming in".

The Commission's budget

- **16.** The Commission was allocated a specific budget for the first time in 2022-23 of £400,000. Its <u>Annual report</u> 2022-23 shows the Commission spent £370,500. It sets out how this was allocated across its activities, including £198,700 for its renewable energy project and £92,000 on Commissioners' fees and expenses.
- **17.** The Commission's budget for 2023-24 was set at £400,000. According to the Annual report 2022-23, the Commission has allocated £210,000 for its work on flooding and to help prepare for its year three work.
- **18.** The Committee asked Dr Clubb for his views on the Commission's expected budget for 2024-25. Dr Clubb said, during recent discussions with the Welsh Government he "was given sufficient comfort that the budget...wouldn't be halved, wouldn't be significantly reduced, even if there is a reduction." He also said the Commission would "work within whatever budget envelope we get".
- 19. During previous scrutiny of the Commission, the Committee questioned Dr Clubb on the Commission's value for money. Dr Clubb acknowledged the need for the Commission to demonstrate "that we're saving Welsh society as a whole more than the budget for the commission every year for the future". The Committee pursued the question of value for money in its latest scrutiny session. In response, Dr Clubb asserted, "if the Government accepts some of the recommendations from our report on renewable energy, we hope to get far more value remaining in Wales." Dr Baxter echoed this point, saying that the Commission "would definitely save Wales considerably more than the commission has a budget for". She added:

"When it comes to value for money, one of the things that we often find when we're commissioning reports is that initially people might come forward with similar ideas to previous reports...and so we have been able to make sure that we are looking under our values of areas that are more radical, are going to cause more distinct change, more innovation...We do know that that does exist in the reports that we produce.

Monitoring outcomes

- **20.** In its Annual report 2021-22, the Commission set out the outcomes it expects to deliver as a result of its work, including
 - 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; and
 - future policy and practice is better informed about ways to minimise the impact of flooding on Wales' communities and infrastructure;
- **21.** Dr Clubb outlined that the Commission has developed a system to track progress towards delivery of the above outcomes. A table summarising progress is included in the Commission's Annual report 2022-23. It focuses primarily on actions/outputs related to the delivery of its work programme.
- **22.** Dr Clubb explained implementation of the Commission's recommendations on renewable energy (see Chapter 3) would be used to further demonstrate delivery of outcomes.
- **23.** Dr Clubb referred to its commitment to "reviewing the outcomes of [Commission] reports", at least for a period of time. He explained the Commission has already reviewed its predecessor's report, <u>Digital Communications</u>

 <u>Infrastructure in Wales</u> (December 2020). He added, "our anticipation is that, in future years, future commissions will also want to review progress against any recommendations that were made [by us]".

Our view

Operational matters

The Commission has recently come under media scrutiny, with questions raised about the dual roles of Commissioners and how conflicts of interests are being managed.

For the Commission to carry out its role effectively, it is important that Commissioners have an appropriate level of knowledge and expertise about the various infrastructure sectors. It is understandable, therefore, that there will occasionally be questions raised about perceived conflicts of interest. We note Dr Clubb's comments that, if individuals had been ruled out of appointment on

the basis of a potential conflict of interest, or a future conflict of interest, there would have been a small pool of candidates to choose from.

Openness and transparency about Commissioners' financial and personal interests is key to protecting the body's integrity and ensuring public trust. We note the Commission's current practice of updating the register of interests on an on-going basis goes beyond existing legal requirements. This is to be commended.

It is essential that the Commission has robust arrangements in place to ensure that conflicts of interest, or perceived conflicts of interests, are managed appropriately. We note that Commissioners are required to remove themselves from discussions or decisions where their interest might suggest a risk of bias. Dr Clubb provided specific examples of how this is working in practice. We seek assurance from the Commission that this requirement is being met consistently and monitored effectively.

Term of appointment

Commissioners are appointed for a period of 3 years. This is significantly shorter than for other Welsh Government public appointees. For example, the terms of appointment of the Future Generations Commissioner and the Children's Commissioner are 7 years), and for the UK National Infrastructure Commissioners are 5 years but can be renewed up to 10 years. Notwithstanding Dr Clubb's assertion that a 3- year term of appointment is not problematic, he is considering requesting an extension for all Commissioners to ensure the Commission can complete its work programme.

We believe there is merit in extending the three-year appointment period for Commissioners.

Demonstrating value for money

In 2022-23, the Commission received a budget of £400,000. While moderate compared to similar bodies, this is not insignificant when it comes to public spend. It is important, therefore, that the Commission can demonstrate value for money.

In our first report, we concluded it would be premature to judge the impact of the Commission's work. Today, our view remains the same – it is still too early to determine how the Commission's work is influencing Welsh Government thinking. We intend to return to this issue during our next scrutiny session,

informed by the Welsh Government's response to the Commission's report on renewable energy.

We were encouraged to hear the Commission has established a system to monitor the uptake of its recommendations. However, uptake of recommendations is not, in itself, a direct measure of success. As Dr Clubb acknowledged, it is only if the Commission's recommendations are implemented that change will be delivered. The Commission's terms of reference set a clear mandate for the Commission to "hold the government to account for delivering any NICW recommendations that it agreed to take forward". We intend to follow up on how the Commission is delivering on this mandate during our next scrutiny session.

Next steps for the Commission?

The Commission performs an important function, providing the Welsh Government with an outside perspective on Wales' long-term infrastructure needs, which may not otherwise be gained from existing sources. The current Commission comprises experts who demonstrate dedication to, and passion for, their work. However, the Commission is small in size and has limited resource, particularly compared to bodies with similar functions, for example, the UK National Infrastructure Commission.

The Commission was initially established almost six years ago, so is still in a nascent phase. Nevertheless, we believe now would be a good time to take stock, and consider whether it is delivering on expectations. We are keen to emphasise this is not a criticism of the Commissioners, rather about ensuring the current model will enable the Commission to achieve its full potential over the coming years. We note the Welsh Government has already committed to undertake "a comprehensive review of [the Commission's] status, remit and objectives at least once every 5 years". The first review is due this year. We expect the recommendations in this report to be used to inform the review.

It is unclear what timeline the Welsh Government is working towards for the completion of the review. We would welcome clarification on this issue.

Recommendation 1. 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.

Recommendation 2. The Welsh Government should clarify the timeline it is working towards for the completion of the review. If the review is unlikely to be completed before the end of 2024, it should explain the reason.

Recommendation 3. 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.

Recommendation 4. 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

3. The Commission's second year

- **24.** The Annual report 2022-23 points out that although 2022-23 is the second year of the Commission's three-year term, it is the Commissions first full year of delivery.
- **25.** In reflecting on achievements in 2022-23, Dr Clubb told the Committee the Commission had been "extremely busy". He explained that, as well as completing its project on renewable energy (covered later in this chapter), the Commission had undertaken work on the roads review, urban biodiversity, Technical Advice Note 15, and grid issues, among other matters.
- **26.** Dr Clubb added that the Commission had completed several 'study tours' across Wales "to find out what's happening with infrastructure in different areas, including looking at flooding in north Wales, renewable energy in mid Wales, and the ports in Pembrokeshire". In addition, the Commission gave evidence to the Committee on the Infrastructure (Wales) Bill, informed by a stakeholder event held jointly with the Royal Town Planning Institute.

Progress towards delivery of work programme

27. The Commission has committed to complete three main projects during its three-year term: renewable energy (2022-23), flooding (2023-24) and climate resilience and existential risk (2024-25). The first two projects were included in the Commission's remit letter and take forward commitments in the 2021 Cooperation Agreement. The third project was discussed and agreed internally by the Commission.

Renewable energy

- **28.** During the 2022-23 reporting period, the Commission completed its project on renewable energy and published its report, <u>Preparing Wales for a Renewable Energy 2050</u> in October 2023.
- **29.** The report explains the Commission focused on three areas identified as gaps in existing activity where it could "add value" by further investigation. These are:
 - capturing the value of renewable energy projects to Wales;
 - tensions and opportunities arising from future energy scenarios; and

- engaging mid-Wales communities on renewable energy projects.
- **30.** The Commission awarded external contracts for research to be undertaken on the above areas. The research findings were used to inform the Commission's report and supplemented by the Commission's engagement with stakeholders.
- **31.** Following its work, the Commission made <u>11 recommendations to the Welsh</u> <u>Government</u> aimed at accelerating deployment of renewable energy across Wales.
- **32.** During the latest scrutiny session, the Committee sought to explore how the Commission's recommendations go further than those arising from the <u>Welsh Government's renewable energy deep dive</u> (December 2021). Dr Baxter drew attention to several of the Commission's recommendations including for a vision for energy in Wales to 2050, with an accompanying strategy and action plan; reform of the system for planning and delivering grid access for renewable energy; for Part L of Building Regulations and permitted development rights to be reviewed; and for devolution of the Crown Estate's functions coupled with the creation of a Sovereign Wealth Fund.
- **33.** Dr Baxter referred to the Commission's recommendation for devolution of the Crown Estate's functions, as "a bit like planting a seed". She added:

"The idea behind that is it may not be something that happens tomorrow, but we are looking into the future. Being able to make sure that Wales takes advantage and is able to generate wealth from its own landscape is something that we would highly recommend and would continue to do so."

34. Dr Clubb explained the Commission had been expecting the Minister for Climate Change to respond to the report by the end of January 2024, although a response had yet to be received. He said he would be writing to the Minister to follow this up. Dr Clubb added:

"my feeling is, perhaps, that [the Welsh Government is] 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."

Flooding

- **35.** The Commission's Annual report 2022-23 provides an update on its work on flooding. Preparatory work was undertaken during the reporting period "to focus on the areas in this sector where NICW would make the most meaningful recommendations." An external consultancy was commissioned to help understand the current picture and suggest focus areas for study. As a result, the Commission's initial work will focus on four workstreams:
 - developing a vision for flood risk management;
 - exploring the options for coordinated strategic and spatial responses to flood management;
 - the funding and workforce resources needed; and
 - quantifying and analysing the land use planning issues associated with flooding.
- **36.** Dr Clubb told the Committee work on the above is being taken forward by consultants in conjunction with the <u>Flood and Coastal Erosion Committee</u>. Research findings are likely to be available by summer 2024, with the Commission report expected to follow in autumn 2024.
- 37. The Committee sought to explore how the Commission is ensuring it avoids duplication, given that considerable work has already been undertaken on flooding. Dr Clubb explained the Project Advisory Group consists of "pretty much everybody who's part of other organisations with an interest in flooding", including representatives from the Flood and Coastal Erosion Committee and Natural Resources Wales who have recently reported on flooding. He added, "I think this project offers them a freedom that they might not have within a regulated public body to be able to say things or push things that they might not [otherwise] be able to".
- **38.** In commenting on the land use planning workstream, Dr Clubb explained, "this comes back to this cyclical question of why people are consenting housing developments in flood prone areas only for Natural Resources Wales to be then tasked with making them resilient to floods. He added, "for me, that's a madness that we just keep on going around this cycle, throwing ever more public money at developments that shouldn't be taking place".

39. The Committee asked whether any of the workstreams will address drought and water storage. Dr Baxter explained its year three project on climate resilience and existential risk would potentially lend itself best to consideration of such matters.

Climate resilience and existential risk

- **40.** According to its Annual report 2022-23, the Commission has begun preparations for its third and final project, "looking at how climate impacts threaten key infrastructure, alongside communication with communities whose existence is therefore under threat".
- **41.** As with its other projects, the Commission is using consultants to help scope out the issues and identify research priorities. The Commission has also <u>issued a call for evidence</u> to seek the views of the public, organisations and stakeholders to help inform its work. The call for evidence closed in November 2023. The Commission is in the process of analysing submissions in order to develop its research phase.
- **42.** Dr Clubb said the project would include "communities that would be most at risk so, low-lying coastal areas". He added, "That, for me, is probably the most interesting and the most difficult project, which is why there's a bit of work going on at the moment to prepare for that".
- **43.** The Commission is aiming to report in 2025 and make recommendations to the Welsh Government on helping public bodies better engage and involve communities in responding to the threats to infrastructure from climate impacts.

Relationship with UK National Infrastructure Commission

- **44.** The Committee's first report on the Commission highlighted the importance of continuing engagement with the <u>UK National Infrastructure Commission</u> (the UK Commission). During the latest scrutiny session, the Committee explored the on-going relationship between the two Commissions. Dr Baxter referred to the relationship as "very good" and said she meets the UK Commission quarterly.
- **45.** The Committee asked whether the Commission had been involved in the UK Commission's <u>Second National Infrastructure Assessment</u> (October 2023).² Dr Baxter explained the Commission has "the opportunity to respond [to the UK

² 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 was published in October 2023 and makes a series of recommendations to the UK Government.

Commission's consultations and reports] in the same way that other organisations do". She added, "We definitely had a heads-up from them about what was in the second infrastructure assessment".

46. Dr Baxter told the Committee, "We don't do a national infrastructure assessment [in Wales]. That's not to say that it's necessarily something that we should do, but it is an option to consider as well". She went on to highlight the differences between the Commissions in terms of their size and roles:

"The National Infrastructure Commission for the UK is different to the one in Wales in that it has a staff of around 50 people who are looking at making suggestions as to what infrastructure should be, and they don't necessarily do it in the same long-term way that we do, so... their work is quite specific in what they do, which is very different to the work that we do."

Improving public engagement and raising public profile

47. During previous scrutiny of the Commission, Dr Clubb said he aimed to improve Commission engagement with young people so that, by the end of its current term, it can demonstrate and share good practice. The Committee pursued this matter in its latest scrutiny session. Dr Clubb said the Commission already uses several social media platforms, and produces videos and blogs, to encourage youth engagement. He explained:

"...with the time available and the budget available, we're doing as much as we can and as well as we can...There's not much more we can do as individuals or as a commission, because we have only one full-time equivalent, and that's the whole commission, essentially."

48. The Committee asked Dr Clubb for his reflections on the low number of responses (15) to the Commission's <u>May 2023 survey</u>, which sought views on public perception of the Commission. Dr Clubb explained:

"We're not central to most people's lives, I think it's fair to say...It's a bit of a niche topic. Our profile is still building. I would anticipate and hope that we get significantly more than 15 responses this year. There were already indications of which of our key performance indicators, if you like, we were succeeding on from those 15 responses, but I would hope that we'll get a

better response this year, and I think that's almost inevitable, if our profile keeps developing."

49. Dr Clubb highlighted visitors to the Commission's website are increasing annually, with around 7,000 "over the past year".

Our view

The Commission has had a productive second year. It has published its report on renewable energy; made demonstrable progress towards its work on flooding and climate resilience and existential risk; held a range of stakeholder events; completed several 'study tours'; and undertaken work on a variety of topical matters.

Renewable energy

In October 2023, the Commission published its first report, <u>Preparing Wales for a Renewable Energy 2050</u>. We are pleased to see that several of the Commission's recommendations accord with those made by this Committee in our reports on <u>renewable energy</u> (October 2022) and <u>marine management policies</u> (February 2022). For example, devolution of the functions of the Crown Estate.

The Commission's recommendations for a review of Part L of the Building Regulations (Part L) and of permitted development rights align with those made by the UK Climate Change Committee (UK CCC) in its <u>Progress Report</u>: <u>Reducing emissions in Wales</u> (June 2023). The UK CCC's recommendations were met with a lukewarm response from the Welsh Government. We will be interested to see whether the Commission has managed to persuade the Welsh Government of the merits of these reviews in the context of increasing renewable energy generation.

The Commission's terms of reference set out a clear process for the Welsh Government to respond to Commission reports, which we welcome. However, the current timeframe for responses (within 6 months and up to 12 months) is longer than we consider necessary or reasonable. We believe a shorter timeframe for responses to the Commission's reports would be appropriate, although we accept that in some cases detailed responses may require more time.

In the case of the Commission's renewable energy report, the Minister committed to a response by the end of January 2024 (i.e. within 3 months of

publication). At the time of writing this report, it had not been received. This is disappointing. As Dr Clubb pointed out, the delay in the response might be a reflection of the challenging nature of the recommendations. Equally, it might be because the Welsh Government is not affording sufficient priority to the Commission's work, which would be regrettable.

We will be keen to follow up on the uptake of recommendations and on progress towards their implementation during our next annual scrutiny session with the Commission.

Flooding

In recent years, there have been various reviews and reports on Wales' long-term approach to flood management, including by the Flood and Coastal Erosion Committee and Natural Resources Wales. Avoiding duplication and ensuring the Commission's work adds value might, therefore, be a challenge.

We heard the Commission sought to focus its work on the areas where it "would make the most meaningful recommendations". We await with interest the publication of the Commission's report and recommendations.

Climate resilience and existential risk

We note the progress made by the Commission in preparing for its project on climate resilience and existential risk. We were encouraged to hear that this work might lend itself to consideration of drought and water storage. We ask that the Commission reflect on how these matters could be incorporated into the research phase of its work, which is currently under development.

We note the UK CCC's Progress Report: Reducing emissions in Wales (June 2023) includes recommendations on community preparedness and response to climate change. We would be interested to hear whether the Commission has engaged, or intends to engage, with the UK CCC in its work on climate resilience and existential risk. We believe there is merit in seeking UK CCC representation on the Project Advisory Board, which will oversee this work. We would like the Commission to explore this matter.

Relationship with UK National Infrastructure Commission

We welcome the continuing engagement between the Commission and the UK National Infrastructure Commission (the UK Commission).

We note the UK Commission has recently published its Second National Infrastructure Assessment. The Assessment covers all economic infrastructure sectors, including digital and energy, which are reserved or mainly reserved, and takes a 30 year view of infrastructure needs. The evidence we received from Dr Baxter suggests the Commission did not proactively engage with the UK Commission's Assessment. We believe this was a missed opportunity. The Commission would have been well-placed to help ensure Wales' infrastructure needs in the digital and energy sectors were fully reflected in the Assessment.

It is unclear why the Welsh Government chose not to task the Commission with carrying out a national infrastructure assessment. Given the constraints within which the current Commission is operating, it would be unreasonable to expect it to do this. However, we believe the Welsh Government should consider the merits of an overall assessment as part of its comprehensive review of the Commission.

Improving public engagement

We welcome the steps taken by the Commission to improve public engagement, including youth engagement, during the reporting period. Despite efforts, progress appears to be slow, as demonstrated by the low response rate to the Commission's May 2023 survey.

We note Dr Clubb's suggestion that infrastructure is a "niche topic", which could explain the slow progress. We recognise that raising public awareness and improving public understanding of the Commission is ancillary to its other work. However, we would encourage the Commission to continue its efforts to raise public awareness over the coming year.

Recommendation 5. The Welsh Government should:

- respond to the Commission's report, Preparing Wales for a Renewable Energy 2050, as a priority, and
- explain why it did not meet its commitment to provide a response by the end of January 2024.

Recommendation 6. 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.

Recommendation 7. The Commission should consider whether and how drainage and water storage could be incorporated into the research phase of its work on climate resilience and existential risk. It should report back to the Committee on the outcome in response to our report.

Recommendation 8. The Commission should-

- clarify whether and how it is engaging the UK Climate Change
 Committee (UK CCC) with its work, in particular its year three project on climate resilience and existential risk, and
- seek UK CCC representation on its Project Advisory on climate resilience and existential risk.

Recommendation 9. As part of the comprehensive review of the Commission's status, remit and objectives, the Welsh Government should consider whether there is merit in requiring the Commissions to undertake a national infrastructure assessment (comparable to that of the assessments undertaken by the UK National Infrastructure Commission).