

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid
Hinsawdd a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate Change
and Rural Affairs



Rebecca Evans AS/MS
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio
Cabinet Secretary for Economy, Energy and Planning

Llywodraeth Cymru
Welsh Government

Dr David Clubb - Chair
National Infrastructure Commission for Wales

NationalInfrastructureCommissionforWales@gov.wales

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Dear Dr David Clubb,

Thank you for bringing forward the publication of the National Infrastructure Commission for Wales (NICW) report "*A Perfect Storm: Is Wales doing enough to co-ordinate action and engage communities in adapting our infrastructure to a changing climate?*".

Please find at the Annex below, Welsh Government's responses to the recommendations in the NICW A Perfect Storm report.

We want to thank the Commission for their insightful and considered report, and for the valuable follow-up discussions you have had with our officials to discuss your findings.

As per those discussions, we think the report contains many important and relevant points on infrastructure development, risk preparedness in communities and getting engagement right that are relevant both in the field of climate adaptation and much more broadly.

Following your discussions with officials, your ask of us was to find our own practical and radical solutions to the issues and opportunities raised by your report. That is the approach we have tried to take in this response, considering the points raised by the report and finding the way forward that we feel best substantively addresses them.

The document responds to each of the recommendations as drafted in the report at 'face value'. As per your discussions with officials, there are areas where we agree with the outcome you describe in the report, but feel there is an alternative approach to take than that outlined the specific recommendation given. In these cases we have rejected

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Gohebiaeth.Huw.Irranca-Davies@llyw.cymru
Correspondence.Huw.Irranca-Davies@gov.wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

the recommendation as drafted but set out what we intend to do in response to the substantive points raised.

Officials across Welsh Government are committed to continuing to engage and work with you in the future as we look to address the substantive points raised in your report.

Yours sincerely,



Rebecca Evans.

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ANNEX

Recommendations

1. *Climate Adaptation Bill* - *In the next Senedd term, the Welsh Government should introduce a Climate Adaptation Bill which should set legally binding targets for climate adaptation and create a framework for action and change.*

Response: **Reject**

This recommendation as drafted would be for a future government to respond to as it would require Primary Legislation. That said, this is an area which we remain keen to build on and consolidate, including on the points brought out in the report such as making responsibility for adaptation clearer, strengthening information and transparency on climate adaptation and encouraging proactive risk assessment work across Wales. Officials would welcome continued engagement with the Commission as we look to further enable and drive progress on climate adaptation across Wales.

We agree with the report's finding that the Welsh Government has an important role to play in terms of setting clear direction on climate adaptation. We are committed to ensuring every person and organisation in Wales knows what they can and should do to prepare for the challenges and opportunities of our changing climate. The Climate Change Committee has also highlighted this key leadership role.

We have taken important steps towards this in our [Climate Adaptation Strategy for Wales](#), which includes asks of groups like the public sector, business and industry and the general public against the fifteen areas of the Strategy. Our view is using our strategies and messaging to set this direction is a leaner, more agile and more proportionate approach than additional primary legislation, which would take several years to develop and implement.

Although we recognise there is more to do on leadership and setting direction, our view is that the current legislative framework is sufficient to enable effective action on climate adaptation. This includes the Climate Change Act 2008, which requires Welsh Ministers to produce reports on Wales' objectives, actions, and priorities on adaptation. The Climate Change Act also includes a specific power to invite or require reporting on climate preparedness.

Additionally, the Well-being of Future Generations (Wales) Act 2015 requires public bodies to act in ways that support resilience and long-term thinking. Our view is that it is impossible for public bodies to comply with the Act if they are not considering climate adaptation as part of their long term thinking.

2. *National Infrastructure Resilience Unit*

The Welsh Government should establish a National Infrastructure Resilience Unit, with an associated Welsh Climate Adaptation Liaison Forum, to address the unclear ownership of the systemic risks of climate change.

Response: **Accept in principle**

We understand the importance of ensuring there is clear ownership of climate adaptation activity, and that this works to drive coordinated action at a regional level and in communities. This is an area where we are keen to do more and where we would appreciate further engagement with the Commission.

At Welsh Government level, climate adaptation is a cross-government responsibility with every minister having a role. Although there is a small central policy team in the climate portfolio, working to coordinate and enable activity across teams, the majority of activity happens within individual portfolios and each Welsh Government portfolio team is responsible for considering climate adaptation in its work.

Our view is that from a Welsh Government policy perspective, this approach promotes a sense of collective responsibility on climate adaptation. We also expect this collaborative approach to adaptation to happen at regional and local levels enabled by the Well-being of Future Generations Act and cross-cutting fora including public service boards, corporate joint committees and local resilience forums.

However, we recognise the challenges raised in the report about understanding who is responsible for infrastructure vulnerability to climate change impacts at a local or regional level. This is an area where we think there is more to do across our climate, infrastructure, planning and resilience teams to set direction and ensure there is clarity of responsibility. This would further support the work of local resilience forums, which as noted in the report already bring together Category 1 and 2 emergency responders, the voluntary sector and defence partners to assess risk, develop and test emergency plans and to develop response and recovery capabilities.

The Local Resilience Forums (LRFs) provide the backbone of local civil protection activity in Wales, ensuring that all relevant agencies work together to assess risks, plan for emergencies, respond collaboratively, and help communities recover.

Since 2024-25, Wales' LRFs have been supported with dedicated funding from the Welsh Government to support multi-agency resilience work. Their work is overseen by the Wales Resilience Forum (WRF), the strategic, pan-Wales body responsible for providing leadership, accountability, assurance on resilience activity, and coordination across Wales' resilience system. The WRF is chaired by the First Minister.

The WRF is supported by the Wales Resilience Partnership (WRP) which coordinates Wales-wide emergency preparedness, drives consistency across the LRFs, ensures risks, lessons and barriers are acted on appropriately, provides assurance to the WRF on delivery, and strengthens communication and good practice across the responder community. The WPR is chaired by the Welsh Government's Chief Officer for National Security and Resilience.

We will continue to deliver emergency preparedness and response activity through this structure, whilst working across policy teams to address the issues raised in the report.

3. Engagement with Communities

Early, inclusive and participatory engagement should be undertaken with all communities on climate adaptation strategies and plans.

Response: **Accept**

We agree it is important to involve the general public at all stages in decision-making on climate adaptation. Communities have crucial local knowledge about flooding, heat, and other issues, and can play a key role in shaping appropriate place-based solutions.

The Well-being of Future Generations (Wales) Act 2015 and Climate Adaptation Strategy for Wales both emphasise how public dialogue plays a central role in effective planning for the future. In line with this, we are already delivering outreach engagement through initiatives such as Wales Climate Week and the Climate Conversations Grant Fund and will continue to invest in more sustained modes of deliberative practice, alongside these flagship activities.

To deliver on this recommendation, we will build on the recommendations from the [Deliberative Engagement Review](#) published in 2025, and will continue to develop tools and resources to enhance our own capacity (and the capacity of others) to apply effective deliberative approaches to inform evidence-based national and local infrastructure solutions. We are keen to work with the Commission as we further strengthen and mature our approach.

4. Chief Participation Officer

By 2028, the Welsh Government should create the position of Chief Participation Officer. This role will lead across government to improve how citizens are involved in decisions.

Response: **Reject**

We agree with the report's findings that engagement with communities is crucial for decision-making at any level, and this is not limited to climate adaptation activity. Under the Well-being of Future Generations Act, the Welsh Government and all public bodies under the Act have a duty to involve people in decision-making as one of the Five Ways of Working.

A number of functional divisions within Welsh Government already operate participatory engagement programmes to ensure evidence-based and inclusive policy making. Although we agree with the Commission's findings that we must continue to go further on embedding and enabling participation across our activity, and continue to encourage other public bodies to do the same in their work, we do not feel the specific recommendation of a Chief Participation Officer would address the practical barriers to doing this as effectively as possible, especially as it would require funding which would need to be found from existing budgets.

We believe the Engagement Toolkit development by the Commission is important resource for enabling effective participation and building on our existing approaches in this area. We would welcome engagement with the Commission on how the toolkit should be further shared and utilised across Wales.

5. Statutory Guidance for Community Engagement

In the next Senedd period, the Planning Acts should be amended to require the production of statutory guidance requiring meaningful community engagement at all stages of the planning system.

Response: **For next Welsh Government**

This recommendation as drafted would be for a future government to respond to as it would require amending Primary Legislation.

Planning Policy Wales (PPW) promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities. PPW states that planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven well-being goals and by using the five Ways of Working, as required by the Well-being of Future Generations Act.

6. Review Planning Policy Wales and new Technical Advice Note

By 2028, the Welsh Government should review PPW to ensure climate adaptation is addressed throughout. A TAN on Climate Adaptation should also be produced.

Response: **For next Welsh Government**

This recommendation as drafted would be for a future government to respond to. Whilst PPW and Future Wales identify a number of climate adaptation considerations such as flood risk resilience, urban heat islands, and air quality it is acknowledged that these have not been explicitly referenced under a climate adaptation chapter or section within the policy documents.

7. Environmental Impact Assessment and Strategic Environmental Assessment

By 2028, secondary legislation and guidance should be amended for climate adaptation to be specifically part of the Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA) processes.

Response: **For next Welsh Government**

This recommendation as drafted would be for a future government to respond to. The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 stipulates in Schedule 4 (Information for inclusion in environmental statements) that Environmental Statements should include information on the impacts relevant to climate adaptation.

8. Green Book Amendments

The UK Government should amend the 'Green Book' to give equal weighting to climate adaptation when assessing new infrastructure projects.

Response: **Not for the Welsh Government**

This recommendation is for the UK Government to take forward, however we recognise the points raised in the report and we are committed to encouraging sustainable and value for money investment approaches both with regards to climate adaptation and more broadly.

From a UK Government perspective, [the Green Book](#) has recently been reviewed by HM Treasury, which included extensive consultation and a new version has been recently published. A number of the changes in the new version impact the issues raised:

- Importance of the strategic case in terms of setting the policy imperatives and investment objectives. This is key to ensuring that relevant evidence is used to generate suitable options for appraisal.

- Ensuring that the Benefit-Cost Ratio is seen in context of a range of evidence and analysis to ensure that consideration is given to relevant factors that may not be easily monetised.
- A review of the discount rate has been commissioned to either ensure that it is still fit for purpose or to recommend necessary changes.

The Green Book does not differentiate between sectors or types of intervention or weight them differently. It is a matter for those drafting and appraising the business cases to ensure that relevant factors are considered. Weighting types of intervention differently may be more likely to introduce bias than to correct for any potential or perceived imbalance because it introduces more subjectivity and, potentially, less consistency.

A previous Green Book review (2020) also looked at the application of the discount rate to environmental impacts. This included consultation with relevant leading economic experts. That review concluded that the Green Book should not change the discount rate for environmental impacts.

Where costs or benefits accrue over the longer term, a lower discount rate is currently applied. This is in part to reflect the uncertainty of the discount rate over the longer run.

More generally, it is fundamental to any appraisal to gather robust evidence both on the direct and wider impacts of any intervention to ensure decisions are properly informed and that such evidence should be objective and tested.

Our Wales Infrastructure Investment Strategy (WIIS) promotes sustainable, long-term financial and investment planning by setting a ten-year strategic framework focused on outcomes rooted in the Well-being of Future Generations Act. The WIIS encourages infrastructure decisions that consider social, economic, environmental and cultural sustainability, and operationalises this through Infrastructure Finance Plans that link annual capital allocations to long-term goals.

9. Establish a Climate Futures Hub

In the next Senedd term, the Welsh Government should establish a 'Climate Futures Hub' as a centre of excellence and support for engaging communities in long-term infrastructure and climate adaptation planning.

Response: For next Welsh Government

This recommendation as drafted would be for a future government to respond to.

As mentioned in our response to NICW's earlier report 'Building Resilience to Flooding in Wales by 2050', we recognise the need for enabling place-based, whole system approaches to climate adaptation in communities and this is something we would be interested to explore further with the Commission and others.

We want to highlight the UKRI / Defra – funded Maximising UK Adaptation to Climate Change (MACC) Hub which provides a knowledge portal hosting research, guidance, case studies and practical tools for adaptation planning. This includes a [specific page](#) with Wales-specific resources. The current MACC programme also provides training and capacity-building support, and integrates climate data and models to support systemic infrastructure risk analysis.

We are actively engaging with Defra and the MACC Hub team and will continue to explore how best to ensure this work continues into the future and that communities and

stakeholders have the resources they need to deliver proactive and successful adaptation activity.

We are also currently reviewing the future role and scope of the Welsh Government Energy Service (WGES) in providing support to the Welsh public sector in relation to climate change mitigation and adaptation, and we are continuing to develop our Climate Action Wales digital hub which provides helpful information and resources to the public.

10. Climate Change Adaptation and Resilience Fund

We repeat our 2024 flooding report recommendation for a new cross-sector climate change and adaptation resilience fund.

Response: **Reject**

As mentioned in our response to NICW's earlier Building Resilience to Flooding in Wales by 2050 report, we recognise the need for sustainable and sufficient funding for adaptation activity in Wales, so organisations and communities can prepare for our changing climate and the challenges and opportunities it will bring.

We expect organisations to apply a long-term approach to infrastructure planning and investment, considering a range of long-term trends including the impacts of climate change. The Wales Infrastructure Investment Strategy sets out that when developing infrastructure investment proposals, spending departments must consider the long-term nature of the development and recognise the implications of climate change including flooding risk. Future Wales and Planning Policy Wales also underline the importance of climate resilience in planning activity at a national, regional and local level.

Our view is that by embedding the need for climate adaptation in our planning and infrastructure funding, we can promote an integrated and fully considered approach rather than 'siloing out' adaptation activity in a separate fund. We continue to encourage bodies to proactively consider funding for adaptation as part of their long-term infrastructure planning in line with our published strategies.

We recognise the points raised in the report on funding and we are actively exploring how we can build on our existing funding mechanisms, including unlocking access to finance for adaptation planning in a sustainable and appropriate way. We are exploring models for sustainable finance, building on exploratory work across Welsh Government including our Sustainable Investment Principles. We are keen to continue engaging with the Commission in this area.

11. Data Platforms

Within the Climate Futures Hub, or separately, the Welsh Government should provide, or otherwise facilitate, platforms for a Welsh climate data and intelligence body, community accessible climate intelligence and regional climate data commons for professionals.

Response: **Accept**

There are a number of useful toolkits and data resources already available which provide relevant data and information to support adaptation planning. These include the Local Authority Climate Service ([LACS](#)) developed by the Met Office Hadley Centre, which provides place-based local-level information on climate projections and extreme weather. While initially developed for use by local authorities, LACS is free to access

and useful to a wide range of other stakeholders. We are working with the Met Office and others to ensure these products help to support action in Wales.

In addition, the Welsh Government provides [DataMapWales](#) as a central hub for presenting geospatial and analytical climate data along with other spatial information, such as indoor environment and building vulnerability data, including indoor air quality outcomes, overheating assessments and building fabric degradation indicators.

We would value ongoing engagement with the Commission about how to ensure this information is as clear and accessible as possible for Welsh stakeholders and communities.

12. Intergovernmental Co-ordination

The Welsh Government should advocate for greater inter-Government co-ordination and representation across the UK on infrastructure resilience.

Response: **Accept**

We agree on the importance of this as an area. The [Wales Resilience Framework](#) underlines the opportunities of working across the UK in this space, and sets out the actions we are taking to deliver this across a range of areas.