

National Development Framework Call for Evidence Consultation
Planning Directorate,
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16th September 2026

Dear Sir / Madam,

Thank you for the opportunity to respond to the consultation on the revision of the National Development Framework (NDF). The National Infrastructure Commission for Wales (NICW) welcomes the review of the NDF and the opportunity to help shape a long-term spatial framework for Wales.

This response is informed by published NICW reports and recommendations which we would like to formally submit in the call for evidence. These include Preparing Wales for a Renewable Energy 2050, Building Resilience to Flooding in Wales by 2050, A Perfect Storm, the Wales Infrastructure Assessment 2026, and our Infrastructure Delivery Research.

Part A - Statement of Public Participation

Question 1: To what extent do you agree the proposed timetable provides sufficient opportunity for meaningful engagement and evidence gathering?

NICW agrees that the proposed timetable can provide sufficient opportunity for meaningful engagement and evidence gathering. However, the effectiveness of the process will depend upon the quality and sequencing of engagement rather than the duration of consultation periods alone. In A Perfect Storm, NICW found that communities often become involved too late in decision-making processes, after key strategic choices have effectively been made. The process of revising the NDF should therefore ensure that engagement begins during evidence gathering and continues throughout policy development, enabling stakeholders to shape outcomes rather than simply respond to proposals.

Question 2: Are there any other stages in the process where additional public engagement or consultation would be beneficial, in addition to those being provided for Options, and draft National Development Framework?

Additional engagement would be beneficial following the completion of evidence gathering and before strategic options are developed. This would allow stakeholders to influence how evidence is interpreted and translated into spatial choices. NICW's work on climate adapta

tion and community engagement demonstrates that public confidence increases when participants can see a clear relationship between their contributions and subsequent policy decisions. A further engagement stage after consultation analysis would also help demonstrate transparency and accountability by showing how responses have influenced the final framework.

Question 3: Are there particular stakeholder groups who may require additional support or tailored engagement?

Additional support should be provided for young people, Welsh-speaking communities, rural communities, disabled people, low-income households, minority ethnic communities, coastal communities facing climate risks, and communities affected by poor transport or digital connectivity. NICW's community engagement work demonstrated that traditional consultation methods do not always reach these groups effectively and that tailored approaches are often necessary to ensure meaningful participation. The NICW Community Engagement Toolkit provides practical examples of how engagement can be adapted to different communities and circumstances.

Question 4: Are there communities or groups whose views are underrepresented in planning processes and who should receive particular attention during the revision of the National Development Framework?

Particular attention should be given to communities experiencing the direct effects of infrastructure and environmental change. These include coastal communities facing erosion and sea-level rise, communities at risk of flooding, rural communities experiencing service decline, communities affected by fuel poverty, and areas with poor digital connectivity. NICW's flooding and climate adaptation work highlights the importance of incorporating lived experience into long-term planning decisions because these communities often possess valuable local knowledge about risks and opportunities.

Question 5A: To what extent do you agree with the engagement methods highlighted?

NICW supports the engagement methods identified in the consultation. However, the success of engagement will depend upon how these methods are implemented and whether they provide genuine opportunities for dialogue and influence rather than simply collecting views.

Question 5B: Are there any additional methods or approaches that should be considered?

NICW recommends greater use of deliberative and participatory methods, including citizens' panels, youth assemblies, community workshops, futures exercises and facilitated discussions. These could be facilitated by other organisations, including the range of relevant 'Commissioners' in Wales. Our Community Engagement Toolkit demonstrates how creative and participatory approaches can help communities engage with complex issues such as climate adaptation, infrastructure investment and long-term planning. These methods can complement more traditional consultation approaches and help reach a broader range of participants.

Question 6: Is there anything else you would like to tell us about the draft Statement of Public Participation?

The Statement of Public Participation should include a clear commitment to reporting back to participants on how their contributions have influenced policy development. It should also establish expectations around accessibility, inclusivity and transparency. Engagement

should be viewed as an ongoing process rather than a series of discrete consultation exercises.

National Conversation Engagement Plan

Question 7: Do the proposed themes cover the most important issues for Wales's future?

We agree that the proposed themes cover the principal issues facing Wales. However, it is important that infrastructure is recognised as a cross-cutting theme connecting all aspects of the conversation. The [Wales Infrastructure Assessment 2026](#) demonstrates that energy, transport, water, digital connectivity and circular economy systems are deeply interconnected and collectively influence economic prosperity, climate resilience, health, wellbeing and equality.

Question 8: Are there any places, communities or issues that should receive special attention during the national conversation?

The national conversation should pay particular attention to coastal communities, flood-risk communities, rural areas experiencing service accessibility challenges, communities affected by economic transition, and areas facing infrastructure constraints. These communities are likely to experience significant change over coming decades and therefore have an important contribution to make to discussions about Wales's future.

Question 9: How can we make sure that everyone in Wales has a chance to take part?

Participation should be supported through a combination of online engagement, local events, workshops, written submissions and partnerships with trusted local organisations. Engagement materials should be available bilingually and in accessible formats. NICW's engagement work consistently demonstrates that no single method reaches all groups effectively and that multiple approaches are required to ensure inclusive participation.

Question 10: What is the best way to engage with you?

NICW is happy to engage in stakeholder events, focused meetings and responding to written consultation documents.

Question 11: Are there any additional comments you wish to make on the draft National Conversation Engagement Plan?

The Engagement Plan should be viewed as the beginning of an ongoing national dialogue rather than a single consultation exercise. Long-term planning requires ongoing discussion about priorities, trade-offs and emerging challenges. NICW's work on future transport systems and climate adaptation demonstrates the value of continuing conversations rather than one-off engagement exercises.

Part B - National Conversation Themes

Question 12: What would you like Wales to be known for in 2050? How can planning, development and infrastructure help make this happen?

By 2050 Wales should be known as a climate-resilient, nature-positive and prosperous nation that has successfully integrated economic development, environmental stewardship and social wellbeing. Wales should be recognised internationally for demonstrating how infrastructure can support decarbonisation, resilience and fairness simultaneously. The [Wales Infrastructure Assessment 2026](#) provides a long-term framework for achieving this ambition through coordinated investment in energy, transport, water, digital connectivity and circular economy systems. Planning and infrastructure decisions will be critical because they shape

where development occurs, how communities are connected and how environmental resources are managed.

Question 13: What should we pass on to future generations in terms of our communities, environment (land, sea and air) and infrastructure?

Future generations should inherit communities that are safer, more resilient, better connected and able to thrive within environmental limits. The revised NDF should therefore protect land, sea and air as long-term public assets and should ensure that infrastructure decisions made now do not transfer avoidable climate, maintenance, biodiversity or affordability risks to future generations. NICW's Wales Infrastructure Assessment 2026 looks across energy, water, transport, digital connectivity and the circular economy to understand future pressures and long-term investment needs, and its purpose is to support better long-term decisions for communities, the economy and the environment. Future generations should also inherit infrastructure that is adaptable rather than brittle. NICW's Building Resilience to Flooding in Wales by 2050 calls for a long-term flood and coastal erosion resilience strategy, nature as a stakeholder, catchment partnerships, community involvement, open data and a climate adaptation fund. Those principles should be reflected in the NDF so that development avoids creating new exposure to flood, heat, drought or coastal risks.

Question 14: Looking ahead to 2050, what are the biggest challenges and opportunities facing Wales, and how should they influence future development?

The biggest challenges are climate change, biodiversity loss, infrastructure ageing, fragmented delivery, water pressure, energy transition, transport dependency, digital exclusion and skills shortages. Our Perfect Storm reports states that Wales has already experienced severe floods and record-breaking heatwaves, that sea levels could rise by over a metre by 2100, and that adaptation is currently less developed than emissions reduction. Future development should therefore be assessed against climate resilience as a core test, not as a secondary environmental consideration. The opportunities are equally significant. Wales can use the NDF to align renewable energy, circular economy infrastructure, digital connectivity, water resilience, transport decarbonisation and nature recovery into one spatial framework. NICW's cross-cutting infrastructure assessment stresses the need for joined-up planning across sectors, long-term policy certainty, improved consenting, better funding and stronger alignment between infrastructure systems.

Question 15: Which parts of Wales should be prioritised for jobs, investment and economic growth, and why?

Investment should be prioritised where it can unlock long-term national value while addressing inequality and infrastructure constraints. This means supporting renewable energy and grid opportunities in areas with strong natural resources, port and supply-chain potential around offshore wind, circular economy clusters where materials can be retained in Wales, digitally underserved rural areas, and regeneration locations where transport, housing and employment can be aligned. NICW's energy assessment identifies Wales's renewable potential, grid constraints, offshore wind opportunities, and the need to retain more value from energy development in Wales. Growth should not simply reinforce existing economic patterns. The NDF should direct investment where infrastructure can enable fair access to opportunity. NICW's circular economy assessment highlights repair, reuse, remanufacture, re-processing and construction materials as opportunities to retain value and create resilient local supply chains.

Question 16: How can planning and infrastructure help create opportunities for people and businesses across all parts of Wales?

Planning and infrastructure can create opportunity by making access to jobs, services, markets and skills easier and more reliable. The NDF should require housing, employment land, transport, energy, water and digital connectivity to be planned together so that growth is not allocated in places where infrastructure cannot support it. NICW's [transport assessment](#) identifies the disconnect between land-use and transport planning as a continuing problem, with some sites still being developed in car-dependent locations. The NDF should also treat digital connectivity as foundational economic infrastructure. NICW's [digital assessment](#) explains that digital connectivity supports productivity, public services, rural businesses, remote working and smart infrastructure, and it identifies rural connectivity as particularly important for Wales.

Question 17: Which industries do you think will be most important to Wales by 2050, and what land, natural resources or infrastructure will they need?

By 2050, strategically important industries are likely to include renewable energy, grid and storage, low-carbon heat, hydrogen where viable, digital connectivity, data-enabled infrastructure, circular economy activities, repair and remanufacture, water resilience, sustainable construction, ports, logistics and climate adaptation services. The NDF should plan the land, grid capacity, water resources, ports, skills infrastructure and transport connections needed to support these sectors. NICW's [energy assessment](#) identifies renewable generation, electricity networks, heat, storage and skills as central to Wales's transition. Wales also has significant potential in circular materials and manufacturing. NICW's [circular economy assessment](#) identifies construction materials, steel, manufacturing, plastics, WEEE, repair, reuse and secondary materials as key areas for future infrastructure and economic opportunity.

Question 18: How can renewable and low-carbon energy projects bring the greatest benefits to local communities and the Welsh economy?

Renewable and low-carbon energy projects will bring greatest benefit where Wales retains more ownership, economic value, skills and supply-chain activity. NICW's [Preparing Wales for a Renewable Energy 2050](#) recommends a Welsh energy vision and action plan, stronger grid planning, building regulation reform, planning reform, pooled planning expertise, community ownership offers, simplified repowering with ownership requirements, and devolution of Crown Estate functions to Wales for reinvestment in Welsh benefit. The NDF should therefore favour projects that demonstrate genuine local and community benefit, not only energy output. NICW's blog post [The wind is not ours](#) argues that without shared ownership and Welsh control over value, offshore wind risks repeating historic patterns in which Wales provides resources while returns flow elsewhere.

Question 19: What should be considered when deciding where renewable and low-carbon energy projects are located?

Location decisions should consider renewable resource, grid capacity, transmission and distribution needs, cumulative landscape and biodiversity impacts, community benefit, repowering opportunities, access to ports and supply chains, and whether projects can support wider spatial objectives. NICW's [renewable energy report](#) states that grid planning should be strategically developed with a long-term view and should consider Wales's policy needs, not functionality alone. The NDF should also avoid separating generation from enabling infrastructure. NICW's [energy assessment](#) identifies limited grid capacity, planning uncertainty and insufficient policy alignment as barriers to renewable deployment, and highlights the need to align generation, distribution and demand.

Question 20: What opportunities are there to reduce energy use and meet more of our energy needs locally?

The clearest opportunities are reducing demand, improving building fabric, supporting low-carbon heat, enabling on-site renewables, using battery storage, supporting local energy systems and strengthening community ownership. NICW's [renewable energy report](#) recommends reviewing permitted development rights to remove unnecessary barriers to renewable deployment, and while these do not form part of the NDF, positive policies in the NDF can reduce barriers to energy reduction measures. NICW's [energy assessment](#) also stresses that energy efficiency should be prioritised through policy and investment, because reducing heat demand can cut bills, support fuel poverty objectives and reduce pressure on the electricity system. The NDF should make demand reduction and local energy generation normal expectations for new development.

Question 21: What changes to the way we plan and develop places are needed to support Wales's transition to net zero, a circular economy, nature recovery and wider environmental sustainability?

The NDF should require development to be planned through a combined net zero, circular economy, nature recovery and climate adaptation lens. NICW's [circular economy assessment](#) argues that the circular economy cuts across every part of Wales's economy and infrastructure, including construction, steel, manufacturing, WEEE, procurement, digital tracking and community repair and reuse. This means circularity should be embedded in design, procurement, construction, reuse and end-of-life planning, rather than treated as waste management after development has occurred. The NDF should therefore make climate resilience and nature-based solutions core spatial policy requirements.

Question 22: How can these changes support a just transition which addresses inequality, creates opportunities and is fair to people and communities across Wales?

A just transition requires communities to share in the benefits of infrastructure change and not only bear its impacts. NICW's [renewable energy report](#) recommends legislation to enable greater community ownership of renewable energy and policies requiring renewable developments to offer community ownership. This should be reflected in the NDF through spatial policy that favours developments with clear local ownership, benefit and engagement commitments. A just transition also means reducing exposure to fuel poverty, poor transport access, poor digital connectivity and environmental risk. NICW's [energy assessment](#) identifies fuel poverty and off-grid rural heating as important challenges, while the [circular economy assessment](#) highlights community repair, reuse and borrowing models as ways to support affordability and local resilience.

Question 23: What are the biggest climate and environmental risks facing different parts of Wales, including flooding, storms, heatwaves, coastal change, water pressures, pollution and impacts on infrastructure, services and natural resources, and how should planning respond?

Planning should respond by placing adaptation at the centre of the NDF. NICW's [A Perfect Storm](#) report identifies floods, heatwaves, sea-level rise, extreme rainfall, urban heat stress, rural drought and coastal erosion as major risks, and recommends a Climate Adaptation Bill, a National Infrastructure Resilience Unit, planning reform, a Climate Futures Hub, dedicated funding and better climate data platforms. The NDF should therefore avoid development that increases exposure to known risks, require resilient design, strengthen green and blue infrastructure, support catchment planning and align infrastructure investment with future climate scenarios. NICW's [flooding report](#) specifically recommends avoiding development on flood-risk areas, establishing catchment partnerships and creating catchment resilience strategies.

Question 24: How can planning help nature and natural systems adapt to climate change so they continue to support wellbeing, ecosystem resilience and essential services for people and communities?

Planning can help by treating nature as infrastructure and by giving natural systems a formal role in resilience, water management, cooling, biodiversity and wellbeing. NICW's [flood-ing report](#) recommends incorporating nature as a key stakeholder within flooding policy and implementation, and scaling nature-based solutions to adapt landscapes to future climate conditions. The NDF should require development to work with catchments, soils, wetlands, peatlands, woodland, rivers and coastal systems rather than degrade them. NICW's [water assessment](#) identifies nature-based solutions and catchment-level planning as important routes to improving water quality, managing runoff, reducing flood risk and strengthening ecosystems.

Question 25: How should land-use planning protect and enhance nature while also supporting housing, renewable energy, food production, timber, economic development, circular economy opportunities, flood resilience and community wellbeing?

The NDF should move towards multifunctional land-use planning. It should not treat housing, energy, food, timber, flood management, biodiversity and circular economy infrastructure as entirely separate questions. NICW's [water assessment](#) recommends catchment-based decision-making that considers cumulative impacts across flood risk, water quality, water resources, biodiversity, agriculture and development. The NDF should also embed circular economy principles into land-use planning. NICW's [circular economy assessment](#) recommends embedding circular principles in planning, design standards, and development plans, including reuse, repair, recovery and material-flow infrastructure. This would allow land-use decisions to deliver multiple wellbeing outcomes at once.

Question 26: How can the planning system help ensure that important landscapes, habitats, coastal and marine areas, and natural resources are protected, restored and effectively managed for biodiversity, climate resilience and future generations?

The planning system should protect important landscapes and habitats by setting clearer spatial expectations on avoidance, restoration, enhancement and long-term stewardship. NICW's [A Perfect Storm](#) recommends that Planning Policy Wales be reviewed to ensure climate adaptation is addressed throughout and that a new Technical Advice Note on climate adaptation be produced. For coastal and marine areas, protection must be integrated with renewable energy, ports, biodiversity, flood resilience and community benefit. NICW's [The wind is not ours](#) highlights the need for Welsh communities to benefit from offshore wind resources, while NICW's [flooding report](#) calls for coastal erosion and flood resilience to be planned over the long term.

Question 27: What do you value most about the sea, and what should it provide for future generations? What does this mean for how we use and manage land and coastal areas?

The sea should be valued as an ecological, cultural, economic and climate-resilience asset. It should provide biodiversity, food, recreation, renewable energy, coastal protection, identity and prosperity for future generations. NICW's [renewable energy report](#) identifies offshore renewable energy and Crown Estate reform as strategically important to Wales's future energy system and economic benefit. This means land and coastal planning must be integrated with marine planning. Coastal communities should not simply host infrastructure; they should share in its value and have meaningful involvement in decisions. NICW's [flood-ing report](#) recommends a 30-year national flood and coastal erosion resilience strategy and community involvement in flood resilience decisions.

Question 28: How can planning and development help create healthier places and improve people's wellbeing?

Planning and development can improve health by creating places that reduce car dependency, support walking and cycling, provide access to green space, reduce air pollution, manage heat, avoid flood risk and provide reliable infrastructure. NICW's transport assessment links active travel, public transport and reduced car dependency to health, air quality and access to services. Climate adaptation is also a health issue. NICW's A Perfect Storm identifies heatwaves, flooding and climate impacts on vulnerable groups as present and growing risks. The NDF should therefore require climate-resilient placemaking, urban greening, sustainable drainage, shade, cooling and safe access to services as part of healthier development.

Question 29: What services, facilities, infrastructure and environmental features are most important for people's health and wellbeing?

The most important features are clean water, safe homes, low-carbon heat, accessible public transport, active travel, digital connectivity, green and blue infrastructure, flood resilience, local services, schools, healthcare, community facilities and access to nature. NICW's water assessment states that clean, safe and resilient water supplies are vital for health and wellbeing. NICW's digital assessment also explains that digital delivery can support health and social services, reduce the need to travel and combat social isolation. The NDF should ensure that such infrastructure is planned alongside development rather than retrofitted after communities are occupied.

Question 30: Are there any places or communities that need extra support to improve health, wellbeing or economic opportunities?

Extra support should be directed to flood-risk communities, coastal communities, rural areas with poor transport or digital access, fuel-poor households, deprived communities, communities exposed to poor air quality and places facing major economic transition. NICW's A Perfect Storm highlights that cities face heat stress, rural communities face drought and coastal towns face erosion, and that vulnerable communities may feel unheard in decision-making. The NDF should identify these spatial inequalities and align infrastructure investment accordingly. NICW's digital assessment identifies digital connectivity as particularly important for rural communities, while the transport assessment highlights rural public transport and accessibility challenges.

Question 31: How can planning make it easier for people to access jobs, healthcare, education, shops, services and community facilities?

Planning should locate development where sustainable access can be delivered from the outset. The NDF should require strategic growth locations to demonstrate how people will access jobs, healthcare, education, shops and services by walking, cycling, public transport and digital means. NICW's transport assessment states that land-use and transport planning are not sufficiently integrated and that this leads to unsustainable, car-dependent development patterns. Digital access must also be part of accessibility planning. NICW's digital assessment explains that digital connectivity can reduce the need to travel and support access to public services, employment and rural business opportunities.

Question 32: How important is good digital connectivity, such as broadband and mobile coverage, for the future of communities and businesses? Where should investment be focused?

Good digital connectivity is essential. It supports business productivity, public services, remote working, rural resilience, transport information, smart infrastructure, digital twins, health and social care, and Welsh-language online communities. NICW's digital assessment

describes digital connectivity as the fixed and wireless networks people and organisations use to exchange information, and identifies fibre, mobile, fixed wireless, satellite and IoT solutions as part of Wales's connectivity ecosystem. Investment should focus on rural not-spots, hard-to-reach premises, urban capacity gaps, mobile coverage, public-sector assets that can enable network deployment, and digital infrastructure that supports transport, water, energy and climate resilience. NICW recommends stronger Welsh Government leadership on mobile connectivity and a more collaborative approach with operators, local authorities and infrastructure providers.

Question 33: What makes a good place to live, and how can planning help create and support these communities?

A good place to live is affordable, resilient, connected, healthy, low-carbon, nature-rich and culturally rooted. It has access to homes, services, schools, healthcare, green space, public transport, digital connectivity, clean water, energy and community facilities. NICW's Wales Infrastructure Assessment 2026 shows that these systems are interdependent and should be understood collectively rather than as isolated sectors. Planning can support good communities by sequencing infrastructure before or alongside development, designing for climate resilience, enabling local services and making places less dependent on car travel. NICW's cross-cutting assessment stresses the need for joined-up planning across infrastructure sectors so benefits and synergies are maximised.

Question 34: What kinds of homes will Wales need over the next 25 years, and where should they be built?

Wales will need homes that are energy efficient, low-carbon, digitally connected, water efficient, climate resilient, accessible and located where sustainable transport and services can be provided. NICW's renewable energy report recommends building regulation reform to mandate renewable technologies and battery storage in new development and significant renovations. Homes should not be built where they create avoidable flood, heat, water, transport or energy risks. NICW's flooding report recommends avoiding development on flood-risk areas, while its water assessment highlights the need to plan for water quality, water resources and catchment impacts.

Question 35: How should towns, cities, villages and rural communities change and grow to meet future needs?

Towns, cities, villages and rural communities should grow in ways that strengthen existing centres, reuse assets, support local services, improve digital and transport access, reduce energy demand and restore nature. NICW's circular economy assessment highlights repair, reuse, borrowing, secondary materials and circular hubs as important elements of local resilience and economic opportunity. Growth should be tailored to place. NICW's community engagement toolkit stresses that engagement is not one-size-fits-all and should be adapted to community context. The NDF should therefore set national outcomes while enabling locally distinctive approaches to regeneration and rural resilience.

Question 36: How should people and goods travel around Wales in 2050, and what transport and infrastructure will be needed?

By 2050 Wales should have a resilient, low-carbon, integrated transport system that supports walking, cycling, public transport, rail, demand-responsive services, low-emission freight, EV charging, rail freight and digital journey information. NICW's transport assessment identifies high car dependency, congestion, maintenance backlogs, transport emissions, limited public transport integration and climate resilience as key challenges. NICW's Infrastructure 2100 work shows that climate change may make transport less convenient and more expensive, making local transport networks, repairable infrastructure, resilience

and participatory engagement more important over the long term. The NDF should therefore prioritise resilience and access, not simply speed.

Question 37: How can planning and new development help support and strengthen the Welsh language?

Planning can support the Welsh language by enabling people to live, work, learn and access services within Welsh-speaking communities. The NDF should align housing, employment, digital connectivity, transport and community facilities so that development sustains rather than displaces local linguistic and cultural life. NICW's digital assessment identifies digital connectivity as supporting Welsh-language online communities and access to cultural and language resources. Place-based planning is important. NICW's Infrastructure 2100 work notes that Blaenau Ffestiniog is a predominantly Welsh-speaking community and that long-term change can pose risks to Welsh-language culture if local identity and community resilience are not protected.

Question 38: How should local history, culture and identity be reflected in decisions about new development?

Local history, culture and identity should shape development from the outset, not be considered only as mitigation. NICW's Infrastructure 2100 work concludes that the history of places matters because transport systems, skills, culture, legacies and local social organisation can increase resilience over time. The NDF should require engagement methods that help communities explain what they value and how places have changed. NICW's community engagement toolkit includes “Looking Back, Looking Forward” as a method using local history and storytelling to build shared understanding of climate adaptation and infrastructure change.

Question 39: How can different parts of Wales contribute to a shared vision for the country while keeping their own unique character and identity?

The NDF should provide a shared national framework for resilience, decarbonisation, nature recovery, infrastructure delivery and wellbeing, while allowing different places to express those goals in ways that reflect their assets, geography, language and culture. NICW's Wales Infrastructure Assessment 2026 provides a national cross-sector evidence base across energy, water, transport, digital connectivity and circular economy systems. At the same time, NICW's community engagement toolkit makes clear that engagement must be adapted to context and community, not imposed as a uniform model. The NDF should therefore combine national consistency with local distinctiveness.

Part C - Role of the revised National Development Framework

Question 40: Do you agree that local councils and regional partnerships should play a stronger role in preparing and delivering the National Development Framework, while reducing unnecessary bureaucracy and duplication? Please explain your views and suggest any improvements.

Yes. Local councils and regional partnerships should play a stronger role, but within a clearer national framework that reduces duplication and clarifies responsibilities. NICW's Infrastructure Delivery Research examines why major infrastructure projects struggle to progress and identifies systemic factors including economics and funding, skills, political drivers, engagement, planning and environmental permitting. The NDF should set national spatial priorities and infrastructure expectations, regional partnerships should coordinate delivery at functional scale, and local authorities should apply this through local planning and place-based delivery. NICW's cross-cutting assessment stresses the need for clearer roles, stronger integration across government and planning policy at the right scale.

Question 41: Are there any issues that should be planned for at a Wales-wide level rather than by regional or local plans?

Yes. Wales-wide planning is needed for energy strategy and grid, strategic water resources, flood and coastal adaptation, national transport corridors, digital connectivity, circular economy infrastructure, climate data, national resilience standards and major spatial choices that have cross-regional implications. NICW's Wales Infrastructure Assessment 2026 is explicitly designed to support long-term national decisions across energy, water, transport, digital connectivity and the circular economy. Climate adaptation also requires national coordination. NICW's A Perfect Storm recommends a Climate Adaptation Bill, National Infrastructure Resilience Unit, common climate data, and a Climate Futures Hub because fragmented action is insufficient for systemic risk.

Question 42: How can overlap and repetition between national, regional and local plans be reduced?

Overlap can be reduced by giving each plan level a distinct function. The NDF should set national outcomes, spatial priorities, evidence requirements and infrastructure principles. Regional plans should coordinate cross-boundary delivery, and local plans should allocate sites and manage local implementation. NICW's cross-cutting assessment identifies the need for better integration across government, clearer tools, updated roles and policy at the right scale. The NDF should also use common evidence and monitoring so regional and local plans do not recreate the same analysis repeatedly. NICW's Infrastructure Delivery Research is relevant because it focuses on systemic delivery barriers across the full lifecycle from conception to funding and completion.

Question 43: How can the National Development Framework give communities, developers and decision-makers more confidence and certainty about future development?

The NDF can give confidence by setting clear long-term spatial priorities, infrastructure sequencing requirements, climate resilience expectations, evidence standards and delivery responsibilities. NICW's cross-cutting assessment identifies the need for long-term, consistent policy independent of short political cycles, because infrastructure providers and investors need clarity and commitment. Communities also need confidence that they will be engaged early and that development will deliver public value. NICW's A Perfect Storm recommends statutory guidance for meaningful community engagement at all stages of the planning system. Certainty should therefore mean certainty for communities as well as for developers.

Question 44: How can planning decisions be made more quickly while still making sure people have a meaningful opportunity to have their say?

Planning decisions can be quicker if engagement happens earlier, technical capacity is strengthened, evidence requirements are clearer and infrastructure priorities are set nationally. NICW's renewable energy report recommends a pooled planning resource for energy to share expertise and technical skills, and proposes that certain renewable energy decisions should default to a positive outcome where statutory timescales elapse without a response. However, speed must not reduce public involvement. NICW's A Perfect Storm recommends early, inclusive and participatory engagement with communities, and statutory guidance requiring meaningful engagement at all planning stages. Early engagement can reduce conflict later in the process.

Question 45: What are the main obstacles that stop developments from being delivered once they have planning support?

The main obstacles are funding uncertainty, grid and water constraints, infrastructure dependencies, skills shortages, fragmented governance, weak community engagement, complex consenting and political uncertainty. NICW's [Infrastructure Delivery Research](#) focuses specifically on the recurring systemic factors shaping infrastructure outcomes, including economics and funding, skills, political drivers, engagement and statutory planning and permitting. NICW's [Infrastructure Cymru 2026](#) engagement also found that the biggest delivery challenges identified by stakeholders included funding uncertainty, weak delivery capability, fragmented governance, an ageing asset base and insufficient political consensus to take difficult long-term decisions.

Question 46: How can the National Development Framework help ensure that infrastructure, such as transport, energy, water and digital networks, is delivered alongside new development?

The NDF should require an infrastructure-first approach. Major development should not be allocated unless the transport, energy, water, digital, flood resilience, circular economy and community infrastructure needed to support it has been identified, sequenced and funded. NICW's [Wales Infrastructure Assessment 2026](#) provides the cross-sector evidence base needed for this approach. The need for integration is clear. NICW's [cross-cutting assessment](#) identifies interdependencies between data centres and water and electricity, EV charging and grid capacity, transport and water resilience, digital systems and transport, and circular economy and construction materials. The NDF should require these interdependencies to be resolved before development proceeds.

Question 47: How can the National Development Framework bring together housing, regeneration, transport, economic growth and infrastructure objectives into a clear long-term plan for Wales?

The NDF should become the long-term spatial expression of Wales's infrastructure and wellbeing objectives. It should bring housing, regeneration, transport, energy, water, digital connectivity, economic development, climate adaptation, nature recovery and circular economy into a single framework that identifies where growth should happen, what infrastructure is needed, and what public value should be delivered. NICW's [Wales Infrastructure Assessment 2026](#) is designed to support better long-term decisions across precisely these infrastructure systems. NICW's [cross-cutting assessment](#) states that Wales needs clear policy, clarity on what infrastructure is needed, improvements to planning and funding processes, and joined-up planning across infrastructure sectors. These should be core purposes of the revised NDF.

Question 48: What information and evidence should be used to help shape the revised National Development Framework?

The revised NDF should use the full published NICW evidence base, excluding annual reports, as a core infrastructure evidence source. This should include the [Wales Infrastructure Assessment 2026](#), the [cross-cutting infrastructure assessment](#), the [Infrastructure Delivery Research](#), [Preparing Wales for a Renewable Energy 2050](#), [Building Resilience to Flooding in Wales by 2050](#), [A Perfect Storm](#), and NICW's published sector assessments on [energy](#), [water](#), [transport](#), [digital connectivity](#) and [circular economy](#). The NDF should also use NICW's [Community Engagement Toolkit](#) and [Infrastructure 2100](#) work to strengthen long-term, participatory and place-based thinking. The evidence base should be transparent, mapped spatially where possible, and updated through monitoring indicators so that the NDF becomes a living framework for long-term delivery rather than a static policy document.

Thank you once again for the opportunity to respond to this consultation, should you require any clarification or expansion on any of the points we have raised, we would be glad to provide further information or meet with officials to discuss.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'JBaxter'.

Dr Jenifer Baxter
Cadeirydd Dros Dro / Interim Chair