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Via email: cyclonerecoveryunit@dmpc.govt.nz

SUBMISSION TO THE DEPARTMENT OF THE PRIME MINISTER AND CABINET ON RECOVERY SETTINGS DRAFT CRITERIA

Thank you for the opportunity to present this submission on draft criteria for recovery settings after a significant natural hazard event.

The Queenstown Lakes District Council (QLDC) appreciates the opportunity to provide feedback on the draft criteria proposed in the consultation on recovery settings criteria. QLDC recognises the importance of establishing clear and effective criteria to guide Government decision-making following significant natural hazard events.

QLDC has made a number of recommendations for further consideration, that include:

- Ensuring consistency between the different sets of criteria to make it clear how they interact and work together;
- Setting thresholds to enable quick decision making on whether criteria have been met;
- Adding criteria related to environmental and ecological damage and resilience; and
- Considering use of a flexible, principles-based approach to support decision-making on support to be provided for recovery categories.

Thank you again for the opportunity to comment. QLDC is happy to provide any additional information that may be helpful to the review process or discuss any of our feedback with the Cyclone Recovery Unit.

Yours sincerely,



Michelle Morss
General Manager – Strategy & Policy
Local Recovery Manager QLDC

SUBMISSION TO THE DEPARTMENT OF THE PRIME MINISTER AND CABINET (DPMC) ON RECOVERY SETTINGS DRAFT CRITERIA

1.0 Context of recovery settings criteria in relation to QLDC

- 1.1 The Queenstown-Lakes District (QLD) has an average daily population of 70,205 (visitors and residents) and a peak daily population of 99,220. By 2053, this is forecast to increase to 150,082 and 217,462 respectively¹. Rapid population growth and high visitor numbers introduce challenges in planning for and managing natural hazard events. Population challenges are compounded by the QLD's geographical location and alpine environment. Transport corridors are located within some of Aotearoa New Zealand's most dynamic environments.
- 1.2 In 2019, QLDC declared a climate and ecological emergency. QLDC's strategic framework identifies disaster-defying resilience as a key outcome for the community². Its Climate and Biodiversity Plan seeks to ensure that the QLD is a place that is ready and prepared to adapt to a changing climate and identifies actions relevant to natural hazards³.
- 1.3 Resilience is also a key element of the QLDC Spatial Plan 2021-51.⁴ The Spatial Plan is an output of the Whaiora Grow Well Partnership, which is an Urban Growth Partnership between Central Government, Kāi Tahu, QLDC and Otago Regional Council. The Spatial Plan sets out the partnership's long-term approach to grow well, identifying priority areas for growth, transport, community facilities, infrastructure, and economic development. Emissions reduction, sustainability, resilience, and community wellbeing underpin all aspects of the Spatial Plan.
- 1.4 Alongside this, QLDC works collaboratively with the community, iwi, hapū and regional council partners to find solutions to the highest priority natural hazard risks in the district. This includes partnering with Otago Regional Council on a programme of climate change risk assessments, adaptation plans and natural hazard risk assessment studies to support community resilience projects and the implementation of a risk-based land use planning framework⁵.
- 1.5 QLDC understands that this consultation builds upon work that the Cyclone Recovery Unit (CRU) has completed to establish a framework of recovery categories that will help prioritise the development of policy settings and decision-making tools. These categories are:

¹ <https://www.qldc.govt.nz/community/population-and-demand>

² [Our Strategic Framework | Queenstown Lakes District Council](#)

³ [QLDC Climate Action Plan](#)

⁴ [Spatial Plan - QLDC](#)

⁵ [Head of Lake Whakatipu | Otago Regional Council](#)

The categories that the settings and tools will address include:

Recovery categories have been informed by the Minister for Emergency Management and Recovery's meetings with councils and communities and by input from lead agencies that were involved in the North Island Weather Events (NIWE) policy development and existing settings administered by the National Emergency Management Agency (NEMA).

These categories are the priorities for the initial suite of tools because they are the areas where significant ad hoc decisions were made and settings came together in different combinations in the recoveries from the NIWE, Canterbury Earthquake Sequence and the Hurunui/Kaikōura earthquakes. Additional scope could be added in the future to address social recovery settings or other aspects of recovery.

Leadership	The degree to which recovery is locally or centrally led – assessing whether elements of recovery policy and delivery should be led locally or centrally, depending on the characteristics of the event.
	Recovery decision-making arrangements – determining if recovery-related decisions require different temporary arrangements than the status quo and if so, what type of arrangements.
	Central government organisation and coordination – identifying how central government agencies support and coordinate recovery activities if the status quo arrangements are not sufficient.
Enabling mechanisms	Legislative and non-legislative instruments – considering mechanisms to remove regulatory barriers to speed up recovery activities.
	Who pays for which elements of recovery – determining if (and if so, what) additional support Government provides and what contributions are required from others.
Infrastructure remediation	Infrastructure continuity – determining which recovery-related infrastructure projects the Government may want to intervene in, to what level, and how to support delivery.
Support for property owners	Approach to severely affected property – determining whether central government provides support to severely affected property owners, and if so, the scope, scale and delivery of that support.
Economies	Business and key sector recovery – determining whether (and if so, what) support is provided to businesses and local economies to recover.

2.0 Question One: Will the criteria in Table 1 help the Government decide whether to get involved? What other criteria would help?

Table 1: Criteria for Government involvement

Criteria	Indicative questions <i>(not all will be applicable in all situations)</i>
Severe or lasting impacts	Is there a significant and/or ongoing disruption to people's lives (e.g., inability to access communications, prolonged transport disruption) that cannot effectively be restored by standard means? Is there severe disruption to national supply chain(s) (e.g., food, fuel, export goods)? Are there severe impacts on local industry that may trigger a system failure at a regional or national level?
Exceeds capacity and/or capability	Does the scale of impact exceed the capacity and/or capability of the status quo lead agencies and/or local authorities to lead, coordinate, or deliver the recovery? Is there widespread damage that surpasses existing capacity to repair? Is the local governance and/or senior leadership incapacitated to the point that decisions cannot be made?
Financial situation	What is the estimated Government cost for standard, non-discretionary recovery programmes (e.g., Civil Defence Emergency Management essential infrastructure repair and recovery funding, land transport funding assistance)? Will the impacts cause worse long-term structural fiscal outcomes than intervening?
Compounding place-based factors	Has the event exacerbated pre-existing vulnerabilities/deprivation? Is it a highly complex situation (e.g., Are there multiple communities/local authorities involved? Did the event affect a mix of urban/rural/commercial uses?)
Role of Government	Are there impacts that only Government can address?

- 2.1 QLDC acknowledges that the five proposed criteria—severe or lasting impacts, exceeds capacity and/or capability, financial situation, compounding place-based factors, and role of Government—offer a useful starting point for determining the necessity of Government involvement in recovery.
- 2.2 However, QLDC has concerns that the proposed criteria are too broad and ambiguously defined, and that they offer insufficient alignment with the five recovery categories that were established in the first round of consultation. It is suggested that consistency be maintained between these recovery categories and the criteria used to assess whether Government intervention is required. More consistency would mean that the decision on whether Government intervention is required could also identify which categories intervention is needed in.
- 2.3 QLDC also notes that the proposed criteria lack specificity in terms of thresholds, and that they span across multiple domains of impact, which could complicate decision-making. As an example, the indicative questions for ‘severe or lasting impacts’ and ‘exceeds capacity and/or capability’ cover a range of domains (infrastructure, economy, social, environment) and do not provide measurable thresholds that inform when local capacity has been exceeded. Without explicit thresholds, both local authorities and central Government may struggle to determine when the qualification for Government assistance has been met. This could lead to delays in decision-making and uncertainty within emergency response and recovery efforts.
- 2.4 Similarly, the criterion of ‘compounding place-based factors’ is vague and does not adequately define how impacts across all of the place-based domains e.g. social, economic, governance and environmental will be assessed. If central Government intervention is to be guided by place-based challenges, these must be clearly outlined to ensure a consistent and equitable approach across different regions.
- 2.5 QLDC recommends that more detailed guidance is developed on threshold levels that can clearly guide when Government intervention is required. An example of potential thresholds is provided below:

Leadership	<i>Local government capacity thresholds:</i> Develop objective criteria to assess when local government resources are overwhelmed, such as staffing shortages or length of CDEM response activation. There also needs to be criteria for assessing and monitoring competencies so that baseline competencies are known prior to a recovery situation.
Enabling Mechanisms	<i>Financial thresholds:</i> Define a recovery cost threshold for local authorities that, if exceeded, would trigger central Government intervention e.g., local government costs exceeding a certain percentage of annual revenue. <i>Governance thresholds:</i> If recovery efforts require changes to laws, emergency powers, or coordination across multiple jurisdictions, central Government leadership is essential to ensure a coherent and legally sound response.
Infrastructure Remediation	<i>Critical infrastructure outage threshold:</i> Define clear thresholds for when the damage to critical infrastructure such as transportation networks, energy supply, telecommunications, and water systems exceeds the capacity of local authorities to restore within acceptable timeframes for their communities. These thresholds could be informed by the Planned Emergency Levels of Service (PELOS) criteria that are to be established under the Strengthening NZ’s critical infrastructure programme.
Support for Property Owners	<i>Social impact thresholds:</i> Establish clear parameters around impacted communities with a specific focus on at-risk communities to ensure equitable support. If the event disproportionately affects disadvantaged or isolated communities, including Māori, rural

	populations, and low-income groups, Government intervention should be activated to ensure equitable recovery efforts.
Economies	<i>Economic impact thresholds:</i> If the scale of the event results in the destabilisation of the local economy and causes cascading economic consequences such as widespread business failure, significant job losses and economic hardship, loss of tax and rates revenue or impact on international reputation.

2.6 It is noted that there are no criteria related to environmental and ecological damage. Establishing criteria around this is recommended to ensure that events which have significant long-term environmental impacts can quickly receive the right level of Government intervention.

3.0 Question Two: Will the criteria in Table 2 help to determine which categories the Government should get involved in? What other criteria would help?

Table 2: Criteria to determine which categories to focus on

Criteria	Indicative questions
Significance	Which are the most severe impacts? Which are critical risks that only Government can address?
Recovery priorities	What outcomes and results are sought from Government involvement (e.g., remediation, resilience, relocation; faster recovery; lower cost of delivery)? What trade-offs might there be in prioritising those results?
Existing settings	Who has responsibilities under existing settings (e.g., local authorities, private individuals, insurers)? Are the existing legal powers appropriate for the situation (e.g., do regulatory barriers need to be removed, does the Government need other powers to enable involvement)? Can existing policies/programmes support acceptable recovery outcomes? Would a discretionary increase or an adjustment make existing settings fit for purpose?
Timing	Have there been recent policy or funding decisions that could be brought forward to support the recovery (e.g., if there are agreed-to National Adaptation Framework principles)? Does providing certainty sooner have more benefits or is more information needed to ensure desired outcomes?
Availability of resources	Is there a local or national shortage of certain resources (e.g., trained specialists, materials)?

- 3.1 QLDC again has concerns that the proposed criteria and questions are too broad, ambiguous and lack clear, objective thresholds for determining when Government intervention is warranted. This may lead to inconsistencies in decision-making between different regions and different events.
- 3.2 The ‘existing settings’ criterion asks whether legal powers are appropriate but does not clarify what conditions would justify shifting responsibilities from local to central Government. Explicit triggers for escalating Government involvement would improve predictability and provide greater assurance to impacted communities and institutions.
- 3.3 Given increasing climate-related disasters, a criterion assessing long-term resilience (e.g., infrastructure sustainability, adaptation measures) could ensure that interventions contribute to future preparedness rather than just short-term recovery.

- 3.4 The proposed criteria also fails to reflect the critical role of iwi Māori and marae networks in the recovery from major events. Any decision framework needs to recognise the importance of this partnership and the capacity that it provides for welfare support and social recovery. Equally areas, such as Queenstown Lakes, which do not have a marae network need to be flagged early as requiring alternate approaches to welfare recovery support.

4.0 Question Three: If the Government is considering getting involved in a category, are these the right steps and questions to determine to what extent and how to deliver support?

- 4.1 QLDC notes that there are three proposed decision trees (infrastructure remediation, support for property owners, support to stabilise national or local economies) which align with three of the established recovery categories. Having decision trees for the remaining two categories is also recommended if this approach is adopted.
- 4.2 However, QLDC strongly suggests that a flexible, principles-based approach will be more effective than decision trees. Recovery requires effective managerialism and relationship building, not command and control, making a flexible, principles-based essential. Recovery efforts involve rapidly changing conditions, unexpected challenges, and a wide range of interdependent factors, such as economic impacts, social vulnerability, and environmental risks. Decision trees are inherently rigid and struggle to accommodate the fluid and unpredictable nature of disaster recovery. The evolving needs and challenges of recovery will be a difficult, and potentially dangerous, subject to be mapped through Yes/No decision gates.
- 4.3 Similarly, complex questions about resilience and long-term recovery outcomes cannot be effectively answered through Yes/No gates. They require ongoing assessment, collaboration, and expert judgment. A decision tree approach risks forcing premature conclusions when a more nuanced evaluation is required.
- 4.4 A decision tree that relies on predefined pathways may fail to account for the unique nuances of each disaster, leading to decisions that are either too slow, too narrow, or misaligned with actual recovery needs. Given the importance of deciding over the potential areas for Government intervention, a more flexible, principles-based approach would be better suited to ensuring effective and adaptive decision-making.

5.0 Question Four: What else should the Government consider when deciding whether adjustments are needed to leadership settings and enabling mechanisms

- 5.1 QLDC emphasises the following key considerations that may contribute to improved recovery outcomes:
- Strengthening infrastructure resilience - Government intervention should go beyond restoring essential services and focus on enhancing infrastructure to withstand future events. A long-term, resilience-focused approach is essential to reducing vulnerability and ensuring sustainable recovery efforts. The decision also needs to be made where resilient infrastructure should be located, and whether retreat through recovery is the more appropriate option. The tools and mechanisms to decide on and manage the process of a highly emotive and impactful action such as retreat need to be defined in advance, as there is likely to be a very narrow window of opportunity for changes of that nature. A potential framework for this is Dynamic Adaptative Pathway Planning (DAPP) which could be promoted more broadly as industry best practice.
 - Building community resilience - Recovery efforts must prioritise community-level resilience, ensuring that affected communities are better prepared for future events. This includes supporting social cohesion, capacity building, and initiatives that empower local responses to disasters.

- Integration with local and national long-term planning - Government support for recovery outcomes should be aligned with regional and district plans, as well as national strategies such as the National Infrastructure Plan and National Adaptation Plan. A coordinated, strategic approach will maximise the effectiveness of resilience investments and prevent misalignment with long-term development goals.
- Enhancing coordination and collaboration - A clear framework for communication and decision-making between government agencies, local authorities, and infrastructure providers is essential for effective response and recovery. Strengthening collaboration will reduce inefficiencies and improve recovery outcomes.
- System-Level Improvements - QLDC recognises ongoing national initiatives aimed at improving New Zealand's ability to manage natural hazard risks and recover from significant events. Continued investment in system-level improvements across multiple portfolios will enhance the country's overall resilience and readiness for future disasters.

Recommendations:

- R.1. Refine criteria to create consistency between criteria for Government intervention and determining categories for intervention.
- R.2. Develop unambiguous and specific thresholds that clearly define whether criteria are met.
- R.3. Add environmental and ecological damage to the criteria for Government intervention.
- R.4. Add long-term resilience to the criteria to determine which categories Government should be involved in, if these are retained.
- R.5. Instead of decision trees, use a flexible, principles-based approach to support decision-making on the extent and delivery of support for a category.