Appendix A DOC s53 comments - Delmore – Record of engagement on proposed revegetation

Topic	DOC comments 09/02/26	Applicant response 05/03/26	DOC response 11/03/26	Applicant response 02/05/26	Issue Resolved - Yes/No
General comment	As previously confirmed, the applicant has addressed my earlier comments regarding WF11 intent, species composition and function, fire and drought risk settings, and long-term establishment and weed management. The maintenance specification is particularly strong and provides a solid basis for consent conditions that support successful establishment, including clear performance settings (90% survival and 80% canopy closure over a minimum five year period) and an inspection and sign-off pathway that includes Auckland Council assessment. My further comments are mainly about enforceability and long-term resilience, particularly around kauri dieback hygiene, adaptive planting, and supplementary podocarp planting if natural recruitment does not occur as anticipated.	Vineway received comments from J Stavert on behalf of DOC on 9 February 2026. The technical aspects of these responses have been prepared by Viridis Consultants (ecology) and Greenwoods Associates (landscape). This will ensure Vineway has a clear record of agreed changes to the proposal, plans, or conditions which it can use to ensure these are carried through into the amendments put to the panel by Vineway. Depending when these are agreed Vineway will do this at the initial panel conference when the panel is set up or when it provides a comprehensive response to comments provided under s 53 FTAA, or both. Vineway thanks DOC for taking the time to engage on the Delmore project.	N/A	N/A	N/A
Target Ecosystem type	The applicant has explicitly confirmed that revegetation is targeting indigenous forest type WF11 (kauri, podocarp, broadleaf), and they propose adding an explicit note to the planting sheets confirming the WF11 intent. The EIA also ties the revegetation programme to supporting succession toward a future WF11 forest type consistent with historic vegetation patterns. A related point is that kauri is excluded from active planting due to kauri dieback spread risk. This is a defensible position, provided hygiene	Noted and no further action proposed. A response regarding kauri dieback management procedures are addressed below under the comment relating specifically to that issue.	Noted. DOC appreciates the clarification that the revegetation is explicitly targeting WF11 and, on that basis, does not seek any further change on this point. The exclusion of kauri from active planting is understandable in light of kauri dieback risk. DOC's view remains that this approach is most appropriate where kauri dieback hygiene requirements are clearly addressed through conditions and the certified TMP.		Yes

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	and risk management conditions are still applied.				
Improved Species Mix	The applicant has responded by adding miro and matai and increasing kahikatea within the relevant mix. They have also responded to the year-round food supply and frugivory point by adding karaka and kohekohe and increasing taraire to support native bird values and successional dispersal processes. The plant palette includes a WF11-aligned suite of canopy and podocarp species consistent with these changes.	Noted and no further action proposed.	DOC does not seek any further change on this point.		Yes
Fire and Drought Considerations	The applicant has reduced mānuka in the bush mix from 20% to 10% and explicitly links this to concerns regarding flammability and drought vulnerability. They state that soil moisture will be actively managed during establishment via watering. A minor remaining issue is that 15% mānuka is retained in the riparian mix on the rationale that fire spread is less likely in riparian environments. That is reasonable, but I would prefer that the overall design avoids large continuous mānuka-dominant patches that could act as a fuel pathway in extreme fire weather.	The intent of the planting is to integrate the species throughout the area, rather than establishing them in single-species blocks. This would involve distributing each species approximately evenly across the site in proportion to its percentage of the total planting mix. In response to DOC's comment Vineway proposes to include a note on each of the landscape planting plans: *"Mānuka plants are to be integrated with other plants throughout each planting area. No manuka single-species planting blocks are to be established."*	DOC appreciates the proposed response. The note requiring mānuka to be integrated throughout planting areas, rather than established in single-species blocks, appears to respond appropriately to the concern about continuous fuel pathways. DOC supports that note being carried through into the relevant planting plans.		Yes
Maintenance, weed control, and infill planting	The applicant has confirmed that a planting maintenance plan will be required via consent conditions and that it will be based on the Strathmill development. The planting specification is detailed and provides clear performance settings, including 90% survival and 80% canopy closure over a minimum five year period. The	Noted and no further action proposed. However, it is noted that changes to the Planting Implementation and Maintenance Plan are proposed in response to the further recommendations below.	Noted. DOC agrees that the planting implementation and maintenance framework is generally strong and provides a sound basis for establishment, infill planting, and ongoing management. DOC does not seek any further change under this heading, subject to the		Yes

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	documents also assign long-term responsibility beyond the initial establishment period, with a Residential Society responsible for ongoing maintenance in perpetuity, including annual site visits and an annual report to the Residential Society.		comments below regarding monitoring, long-term implementation, and weed outcomes.		
Further Recommendations					
Climate change adaptation	It would be worthwhile to include an explicit adaptive planting condition that enables substitutions (and additional planting where required) if monitoring shows consistent heat or drought failure for particular species during establishment. The implementation and maintenance specification already places heavy emphasis on moisture management and avoiding drought stress (including specific watering and soil moisture settings), which is a strength. It also contemplates replacement plant species being discussed and agreed with the Landscape Architect, which provides a useful approval mechanism. What is still missing is the clear, criteria-based "adaptive" part: a defined pathway that links observed climate performance (for example, repeated drought-related mortality in a planting season) to allowable, WF11-consistent substitutions.	This recommendation is consistent with the intent of the Planting Implementation and Maintenance Plan and related proposed conditions of consent that planting successfully establishes and is replaced where it does not. In response to DOC's comment Vineway proposes to expressly refer to climate performance as part of the into the planting implementation and maintenance plan monitoring report condition, which is proposed condition 79. This is provided for in new subparagraph (d). Changes to proposed condition 79 are also proposed by Vineway in response to DOC's comment below, so an amended version of proposed condition 79 is recorded there.	DOC generally welcomes the proposed amendment to condition 79, as it goes some way toward addressing the earlier concern by explicitly linking monitoring to drought-related mortality and species suitability review. DOC's preference, however, would be for the wording to go slightly further by providing a clearer adaptive response where the drought-mortality trigger is met. In particular, it would be helpful for the condition to indicate that replacement planting, and any appropriate WF11-consistent species substitutions, are followed through in a timely way. In DOC's view, this would better support the long-term resilience of the planting response under increasingly dry conditions.	In response to this comment the project ecologist (Viridis consultants) has proposed a further amendment to condition 78 which requires a monitoring report to demonstrate compliance with the certified Implementation and Maintenance Plan. This amendment adds the following to the drought mortality monitoring information requirement as follows: *(d) An assessment of whether ≥20% drought-related mortality of any species has occurred with the year that is the subject of the Monitoring Report. If this has occurred for any species the consent holder must review the suitability of the species for planting within the site. Where a species is found not to be suitable, any replacement species must be WF11-consistent and selected by a suitability qualified ecologist and/or landscape architect and implemented within the next planting year.*	No - refer to paragraph 4.5 of s53 comments letter. Amendments are sought to proposed condition 78.

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Performance monitoring and reporting	This would be much stronger if there were a simple requirement for periodic reporting to Auckland Council linking observed outcomes to corrective actions where required. The specification already provides strong performance targets (90% survival and 80% canopy closure) and an inspection framework, including three-monthly inspection reports during the establishment period and a Council inspection decision at five years. If that same clarity was carried into an explicit reporting condition (even brief, milestone-based reporting), it would materially improve transparency, especially for weed suppression and canopy development outcomes.	This comment aligns with the performance target and inspection framework already proposed by Vineway. In response to DOC's comment Vineway proposes to amend condition 79 to include that annual milestone reporting is required as part of the Monitoring Report on survival rates, canopy development, weed suppression, and corrective actions. *The consent holder must submit an annual monitoring report to Council for all new revegetation areas on Lots 1901, 1904, 1905, 1908, 1910, 1920 and 1922, and for all existing bush covenant areas on private residential lots, to demonstrate compliance with the certified Implementation and Maintenance Plan. The Monitoring Report must include but is not limited to the following information:* *(a) Identification of pest plant and pest animal presence, a description of weed suppression outcomes, and confirmation of control measures undertaken;* *(b) Photographic records from fixed monitoring points demonstrating vegetation establishment and progression over time and a description of canopy development and species survival rates;* *(c) Recommendations for remedial planting or maintenance actions where performance criteria are not being met and/or where alternative weed control measures are required; ~~and~~* *(d) An assessment of whether ≥20% drought-related mortality of any species has occurred with the year that is the subject of the Monitoring Report. If this*	DOC supports the proposed inclusion of annual monitoring reports to Council and agrees that this improves transparency and oversight. The matters proposed to be covered appear generally appropriate. DOC considers this is a helpful improvement and does not seek any major further change on this point.		Yes

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		has occurred for any species the consent holder must review the suitability of the species for planting within the site. Where a species is found not to be suitable, any replacement species must be WF11-consistent and selected by a suitability qualified ecologist and/or landscape architect; and *(e) An assessment of whether the required minimum 90% plant survival rate and progression toward 80% canopy closure has been achieved;* *The monitoring report is no longer required when it can be demonstrated that the planting has successfully established in accordance with Condition 79(~~d~~ e).*			
Kauri Dieback Hygiene conditions	Even though kauri is not being planted, earthworks and planting can move soil and potentially spread kauri dieback. The rationale for excluding kauri explicitly acknowledges dieback risk. Accordingly, it would be worthwhile ensuring hygiene requirements are clearly conditioned, including practical controls (clean-down, soil movement management, and compliance checks) appropriate to the site and works.	Kauri are present on the site, so it is agreed that having appropriate management procedures is important. Vineways' understanding is that these are already provided for by the Tree Management Plan that is required by proposed condition 27. Proposed condition 27 requires a final Tree Management Plan to be provided to Auckland Council for certification. The purpose of the final Tree Management Plan is to manage arboricultural effects on vegetation identified within the Arboricultural Report. Section 8 of the Arboricultural Report recommends adopting kauri hygiene requirements and these are attached to the Report. However, to provide DOC with confidence about this Vineway proposes to amend proposed condition 27 to expressly refer to kauri dieback management as being a matter to be included in the final Tree Management Plan. The applicant has also included an amendment to remove the deemed certification aspect of the condition,	DOC agrees that kauri dieback management is appropriately addressed through the certified TMP, and supports explicit reference to that in the relevant condition. DOC's view remains that the effectiveness of that response will depend on the hygiene controls being sufficiently clear and practical at implementation stage. In that respect, it would be helpful for the final TMP to clearly capture the key measures needed to manage kauri dieback risk, rather than relying on high-level reference alone.		Yes

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		which was intended to be removed prior to lodging the conditions and which responds to feedback from Ms Averill. *At least 20 working days prior to the commencement of any vegetation clearance works for any stage or sub-stage of the development, the consent holder must prepare and submit to Council a final Tree Management Plan (TMP) for certification. ~~Council must respond to the request within 20 working days, or the TMP is deemed to be certified.~~ The purpose of the TMP is to manage arboricultural effects on vegetation identified within the Arboricultural Report and to specify procedures for restricting the spread of kauri dieback.* The kauri dieback procedure document included in the Arboricultural Report is attached for completeness.			
Podocarp recruitment and natural succession assumptions	The response relies partly on the expectation that podocarp density will increase through natural seed dispersal over time. That is plausible, but it is also a common failure point in restoration if recruitment is slower than expected or if weeds maintain dominance. I recommend a simple set of clear thresholds and follow-up actions, rather than relying on assumption of survival and recruitment alone. For example, if podocarp survival and recruitment are below expectation at Year 5, require supplementary podocarp planting in suitable microsites.	Vineway respectfully does not agree that changes as described are required to the proposed conditions of planting implementation and maintenance plan. This is because the proposed species mix already includes planted podocarps at ecologically appropriate densities consistent with a WF11 trajectory. The planting specification, 90% survival target, 80% canopy closure requirement, and 5-year inspection and maintenance framework collectively provide a robust mechanism to achieve sufficient structural diversity and canopy development. Further, and importantly, no mitigation or offset calculations rely on an assumed future increase in podocarp density through natural recruitment. Natural seed dispersal has been described as a potential ecological benefit, not a dependency	DOC acknowledges the applicant's point that no mitigation or offset calculation relies on future natural podocarp recruitment, and DOC is not suggesting a plantation-style management approach in perpetuity. DOC's earlier concern was narrower than that, and related more to whether there should be some modest contingency if podocarp establishment is clearly below expectation by the end of the establishment period. One possible middle ground could be a Year 5 check on planted podocarp performance and	In response to this comment the project ecologist (Viridis consultants) has said that establishment work over the 5-year period is already required by the existing conditions if the performance targets are not met. This is by virtue of condition 78 which sets those performance targets as mandatory outcomes; the consent holder is responsible for establishment and maintenance "until 80% canopy closure has occurred and a minimum survival rate of the plants being 90% of the original density through the	No - refer to paragraph 4.6 of s53 comments letter. Amendments are sought to proposed conditions 78 and 79.

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		underpinning the proposal's effects assessment or performance standards. At some stage, restoration must transition from managed establishment to natural successional processes. Imposing ongoing density thresholds beyond the establishment phase risks shifting the framework from restoration to plantation-style management, which is not the ecological intent.	evidence of recruitment, with supplementary planting in suitable microsites only where there is an obvious shortfall relative to the intended WF11 trajectory.	entire planting area". This responsibility is in place "over a minimum 5-year period". The monitoring report required by condition 79 must be prepared until those thresholds are met. It is considered likely that 5 years will be sufficient to ensure successful establishment of the planted community, including podocarps, but the language already provides a contingency for if a slightly longer time ends up being needed. As a result, no species-specific additional thresholds or planting triggers are considered necessary.	
Long-term enforceability and resourcing	Long-term responsibilities are assigned to a Residential Society. The key issue is ensuring this obligation is enforceable and durable over time, with adequate resourcing. The consent framework should make it difficult for these obligations to be diluted or deferred, particularly once the development is occupied.	Noted and no further action proposed.	DOC does not seek any further change on this point.		Yes
Weed Risk	The weed context is significant, and the detailed weed control methods in the planting specification are therefore an important strength. I would support linking performance targets not only to planting survival but also to weed suppression and canopy development outcomes, so that surviving plants do not coexist with persistent weed dominance. The specification itself is clear that adequate moisture and	Regarding the recommendation for a canopy performance target, proposed condition 79 (reproduced above) includes a canopy development performance target of 80%. Regarding a weed-related performance target, the draft planting and implementation plan includes weed suppression requirements as part of all phases. The intent is that all weeds identified are removed during each initial planting visits and then subsequent maintenance visits.	DOC welcomes the proposed amendments in relation to weed management. Requiring weeds identified during establishment and maintenance visits to be removed, and applying that through both Phase 1 and Phase 2, strengthens the proposal and responds constructively to DOC's earlier concern. DOC considers that,		Yes

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	eliminating competition are the two key determinants of success, which aligns with this point.	In response to DOC's comments it is proposed that the draft planting and implementation plan is amended to specify the weed removal performance target required for each phase and planting / implementation visit. This would see: • The text associated with Part 5B of Phase amended to read: *Pest animal and weed control is required to maximize the survivability of plants in their first 5 years of growth. Animal pests are a common cause of failure for new riparian planting and the Consent Holder is expected to approach the task within industry standards and laws with common sense and high safety priorities. Weeds and pasture grasses are key competitors for new plantings. The weed management program should be undertaken in a proactive as opposed to a reactive manner. It will ensure that weeds do not compete with the new plantings.* *To this end, <u>all weeds identified during an initial planting or following maintenance or inspection visit will be removed,</u> weeds and grasses shall always be controlled before they flower, set seed or get to half the height of the new plantings.* • The text associated with Part 5C2 of Phase 1 amended to read:	together with the proposed annual reporting to Council on weed suppression outcomes and corrective actions, this provides a more robust basis for supporting long-term restoration success. No further change is sought on this point, beyond ensuring the amended approach is reflected in the final certified documents and conditions.		

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		The Consent Holder will undertake regular maintenance visits. They are required to: *a) Review work done in the month(s) prior to that visit* *b) Assess the condition of plantings and identify any issues* *c) Undertake weed control work to be done <u>with all weeds that are identified being removed</u>* *d) Identify and confirm work for upcoming months* *e) Review weed control species lists and identify any new threats* • *The text associated with Part 7C2 of Phase 2 amended to read:* *A list of key weeds to be controlled if required and the appropriate eradication methods for each species is listed in Section 5F below. Note this list is not exclusive. Control of additional weeds will be undertaken with the same methodology. In some cases removal may require hand pulling of weeds as opposed to spraying. <u>All weeds that are identified during each maintenance visit will be removed.</u>*			