PALMERSTON NORTH CITY COUNCIL

AGENDA

MINUTES ATTACHMENTS

COUNCIL

9:00 AM, WEDNESDAY 25 MARCH 2026

COUNCIL CHAMBER, FIRST FLOOR
CIVIC ADMINISTRATION BUILDING
32 THE SQUARE, PALMERSTON NORTH

COUNCIL MEETING

25 March 2026

8 Implication of the Wastewater Environmental Performance Standards (WEPS) on the Nature Calls Project

Nature Calls

Council Meeting 25th March 2026

Background

2017	Nature Calls project begins to select a best practicable option (BPO) for the wastewater treatment plant discharge reconsenting.
Nov. 2021	Council select a dual land and river discharge option to proceed to consent.
Dec. 2022	Consent for the dual land and river discharge was lodged with Horizons Regional Council.
May 2024	During the last LTP process the Nature Calls budget was examined and the selected discharge option (in consent application) was deemed unaffordable. Council directed the CE to put the consent on hold and revisit the option selection.
Late 2024	A long list of options was revised. During this time the Government announced the development of national wastewater standards. The project was put on minimal activity until further information was available.
Feb 2025	Draft wastewater standards were released. The options were analysed against this.
May 2025	Council reviewed a traffic-light screening to determine which long list options were to have no further work done. The project then moved to a low regrets activities only waiting release of the final standards.
Nov 2025	The Government released the Wastewater Environmental Performance Standards (WEPS). The options have since been compared against the WEPS and run through the traffic light process for Council to consider again.

Previously Considered Options - May 2025

Option	Decision	Justification
A: Discharge to River at Ōpiki	Keep	
B1: Discharge to River at Totara Rd	Keep	
B2: B1 + Future Adaptive Management Solution to address periphyton risk	Keep	
C: Discharge to River at Totara Rd and Ōpiki (at low flows)	Keep	
D: Discharge to River at Totara Rd and Ōpiki (at low flows); and Discharge to Land (75% Average Dry Weather Flows (ADWF))	Discard	Not a practicable option because of cost for Nature Calls.
E: Discharge to River at Totara Rd and Ōpiki; Discharge to Land (soil moisture dependent, >75% ADWF)	Keep	
F: Discharge to Ocean	Discard	Not a practicable option because of cost and likelihood of Treaty Partner objections for Nature Calls.
G: Discharge to River at Totara Rd; Discharge to Land (Staged move)	Discard	Not a practicable option because of cost and compliance for Nature Calls.
H: Discharge to River at Totara Rd; Discharge to Land	Discard	Not a practicable option because of cost and compliance for Nature Calls.
I: Discharge to River at Longburn; Discharge to Land (Previous BPO and option that consent was submitted for)	Discard	Not a practicable option because of cost for Nature Calls.

Options to Consider

- Previously considered options brought to Council in May 2025 included Options B1 and B2.
- Both options were for a discharge to the river at Totora Road; and B2 also included Adaptive Management.
- During further refinement of the options, it has been determined that Adaptive Management could be applied to all of the remaining options (not just B2). This allows for the benefits of this approach to be available alongside the other remaining options.
- B1 and B2 are now presented as one 'B' option for consenting purposes, Council could decide to apply Adaptive Management to all the other remaining options.

Adaptive Management

- Adaptive Management was a Council-directed approach (established in 2021 as a resolution of the previous BPO process) to continually reduce effects on the river by exploring ways to divert wastewater from the Manawatū River during the period of the consent (35 years)
- An Adaptive Management Strategy (AMS) was drafted with Rangitāne and submitted with the previous consent application. The AMS sought to reduce the effects of the discharge on the mauri of the river by adopting a range of methods such as offsetting and reducing wastewater going to the river.
- As outlined earlier, Option B2 brought to Council in 2025 included Adaptive Management. Officers now recommend that Adaptative Management is applied to all the discharge options as the benefits are applicable to all of the discharge options.
- Council could decide to apply Adaptive Management to all the other remaining options prior to public engagement commencing, so that iwi, stakeholders and the community can understand how this would apply to the project.
- If Adaptative Management is included with all of the discharge options, it would form part of the consent application prepared and submitted to Horizons.

Options to Consider

	Discharge	Cost	Standards	Objectives	Adaptive Management
A	Discharge to River at Ōpiki	🟩	🟩	🟨	?
B	Discharge to River at Totara Rd	🟩	🟩	🟩	?
B*	Discharge to River at Totara Rd	🟩	🟩	🟩	☑
C	Discharge to River at Totara Rd (at high flows) and below Ōpiki Bridge (at lower flows)	🟩	🟩	🟨	?
E	Treated wastewater is discharged to the Manawatū River at Opiki or Totara Road when a High Dilution ratio (1:250) can be met, with discharge to land at all other times	🟥	🟨	🟥	?

*Applies Adaptive Management (as per previous B2)

Project Objectives

Project objectives as developed by Council, used throughout the BPO process:

A best practicable option that is developed in partnership with Rangitāne o Manawatū which:

1. *Protects public health and minimises public health risks.*
2. *Minimises adverse environmental effects on air, land and water;*
3. *Is sustainable, enduring, and resilient;*
4. *Contributes to improving the health and mauri of the Manawatū River;*
5. *Takes an integrated approach to the management of the Manawatū River Catchment including understanding cumulative effects (not assessed as cumulative effects on entire catchment depends on actions undertaken by others);*
6. *Enhances peoples use and enjoyment of the Manawatū River*
7. *Is affordable and cost effective;*
8. *Minimises whole of life carbon emissions and optimises resource recovery;*
9. *Is innovative while being evidence based;*
10. *Facilitates long term growth and economic development;*
11. *Is developed with the active engagement of the community and key stakeholders (not assessed at this stage given engagement will occur later)*

*Note that Objectives 4,5 & 11 have not been assessed.

Implications of the WEPS

- WEPS classify different discharge environments and set the parameters to be met as an end-of-pipe quality requirement, meaning councils must align their wastewater treatment performance with these nationally defined standards.
- Regional councils are obligated to assess against the defined WEPS treatment levels, and these requirements directly influence which treatment technology can achieve these levels.
- Cultural effects and other non-WEPS matters are still assessed under the RMA (or proposed NEA), so WEPS do not replace broader environmental, social, or cultural considerations.
- WEPS now include clarified requirements for periphyton risk assessment, which includes options discharging at Totara Road (hard-bottomed river). All Totara Road discharge options have been assessed against these updated periphyton requirements, influencing their feasibility and risk profile.
- Land discharge options require site-specific investigations before risks can be assessed. These investigations involve significant upfront costs, with compliance with the WEPS only able to be confirmed once the work is complete.

Cost assumptions

Methodology:

- High-level cost estimates have been prepared using base cost components from previously developed (2024) estimates.
- These were built up to facilitate new high-level options costs for shortlisting, and therefore should be considered for comparative purposes between options only.
- The options are also not yet well defined and therefore risk of unknown costs and change is higher. The costs are expected to change with time and further development.
- A comprehensive cost estimate for all remaining options will be undertaken by a qualified cost estimator.

Assumptions:

- Several high-level assumptions were made to build the costed options for traffic light screening. These assumptions will require confirmation during technical options development in April to July 2026.

Inflation Considerations:

- As the costs are based on 2024 rates, no inflation adjustments are needed against the 2024 LTP budget limit (same-year figures). The costs presented are uninflated costs.

Contingency Allocation:

- Contingencies have been allocated based on the cost estimates prepared in 2024. Higher contingencies have been applied to areas of greater uncertainty as assessed by the qualified cost estimator at that time.

Exclusions:

- Whole of life cost, including ongoing operational costs, has not been factored into these estimates but will be addressed during detailed technical options development.

Description of Options

	Discharge	Cost ($M)	WW standards	Objectives alignment
A	Discharge to River at Ōpiki	$360	Complies	General Alignment

WW Standards and Risks

- CAPEX costs for new & upgraded infrastructure
- OPEX conveyance costs
- Potential perception risk that PNCC are sending their treated wastewater elsewhere.

Assumptions:

- New WWTP (TN 5mg/L) (typically Membrane Bio-Reactor (MBR), or similar with high rate activated sludge), value engineering applied.
- Highest level of treatment.

Description of Options

	Discharge	Cost ($M)	WW standards	Objectives alignment
B	Discharge to River at Totara Rd	$290	Complies	Strong Alignment

WW Standards and Risks

- Periphyton risk assessment required
- Improvement of mixing at Totara Rd could reduce periphyton risk
- TP reduction will require further alum dosing than originally considered for Option B1
- **Assumptions:**
- New WWTP (TN 4mg/L) (typically Membrane Bio-Reactor (MBR), or similar with high rate activated sludge), value engineering applied.
- Highest level of treatment.

Description of Options

	Discharge	Cost ($M)	WW standards	Objectives alignment
B*	Discharge to River at Totara Rd	$290	Complies	Strong Alignment

WW Standards and Risks

- Periphyton risk assessment required
- Improvement of mixing at Totara Rd could reduce periphyton risk
- TP reduction will require further alum dosing than originally considered for Option B1
- **Assumptions:**
- New WWTP (TN 4mg/L) (typically Membrane Bio-Reactor (MBR), or similar with high rate activated sludge), value engineering applied.
- Highest level of treatment.

*Applies Adaptive Management (as per previous B2)

Description of Options

	Discharge	Cost ($M)	WW standards	Objectives alignment
C	Discharge to River at Totara Rd (at high flows) and below Ōpiki Bridge (at lower flows)	$370	Complies	General Alignment

WW Standards and Risks

- Low dilution ratio standards apply at Ōpiki and WWTP upgrades therefore required to reach high level of treatment due to low dilution standards
- Discharging at Totara Road (rather than Ōpiki) saves OPEX costs (e.g. conveyance vs. alum dosing)
- Periphyton risk assessment required for discharge at Tōtara Road
- Potential OPEX cost reduction by minimising alum dosing (and additional sludge) potentially offset by annual pumping costs – to be calculated.

Assumptions:

- New WWTP (TN 4mg/L) (typically Membrane Bio-Reactor (MBR), or similar with high rate activated sludge), value engineering applied.
- Highest level of treatment.
- Conveyance and discharge to Manawatū River at Ōpiki during low river flows (soft-bottom portion of the river).

Description of Options

	Discharge	Cost ($M)	WW standards	Objectives alignment
E	Treated wastewater is discharged to the Manawatū River at Opiki or Totara Road when a High Dilution ratio (1:250) can be met, with discharge to land at all other times	🟥 $500 + substantial other costs.	🟨 Cannot assess (land is unconfirmed)	🟥 Weak Alignment

WW Standards and Risks

- This option provides moderate treatment only, with risks around meeting TN limits (especially achieving 15 mg/L at Totara Road) and may not be supported by iwi due to the lower treatment standard.
- River and land discharge constraints are significant: Totara Road requires low/medium periphyton risk; Ōpiki relies on high dilution; land discharge is highly restricted by soil moisture, requiring ~4,927 ha of land and ~500,000 m³ storage.
- Land discharge also requires confirmed land availability and site-specific assessment, adding uncertainty and complexity before any consent application.

Assumptions:

- Upgrade existing WWTP (TN 15 mg/L), upgrading the existing WWTP components as far as practicable without large step-change. Improved treatment (but not highest level of treatment possible). This WWTP upgrade provides additional processes to the existing lagoon system to reduce total nitrogen to 15mg/l. The total nitrogen reduction achieved by this option is significantly less than achieved by Options A, B and C. Discharge to river only possible when high dilution ratio (250:1) is met.
- Land area requirements are based off a soil moisture constraint vs nutrients. A percentage land area is assumed to be not suitable for discharge due to proximity to high risk areas such as residential houses, schools, waterways etc.

Considered options

	Discharge	Cost ($M)**	WW standards	Objectives alignment
A	Discharge to River at Ōpiki	$360	Complies	General Alignment
B	Discharge to River at Totara Rd	$290	Complies	Strong Alignment
B*	Discharge to River at Totara Rd	$290	Complies	Strong Alignment
C	Discharge to River at Totara Rd (at high flows) and below Ōpiki Bridge (at lower flows)	$370	Complies	General Alignment
E	Treated wastewater is discharged to the Manawatū River at Opiki or Totara Road when a High Dilution ratio (1:250) can be met, with discharge to land at all other times	$500	Cannot Assess (land is unconfirmed)	Weak Alignment

*Applies Adaptive Management (as per previous B2)

**Adaptive Management costs are not included

Public Engagement

- Public feedback on Nature Calls is open from April to May 2026.
- The purpose is to seek community feedback on the revised list of wastewater discharge options.
- A document will outline the background to the project, regulatory requirements, funding, the establishment of Central Districts Water, and the discharge options under consideration. The document also includes a submission form. This will also be available online and at libraries in Palmerston North, Shannon and Foxton.
- Public drop-in sessions will be held in Foxton, Shannon, at the Palmerston North Central Library and Council customer service centre to provide opportunities for people to speak directly with staff and ask questions about the options.
- All feedback received will be analysed and reported back to Council to inform decision-making on the preferred discharge option.

Resource Management Act Reform

- The Government has introduced Resource Management Act reform that seeks to replace the RMA with the Natural Environment Act (NEA) and the Planning Act, with enactment likely in Q3 2026.
- The Natural Environment Bill is the key legislation for wastewater consenting (covers air, water, land, soils, biodiversity), while land-use planning under the Planning Bill will occur later.
- Because the WEPS now apply to new discharges, and depending on the final BPO outcome a new consent application may be required to be submitted to Horizons. If this is the case, the previously lodged consent will need to be withdrawn.
- Depending on timing of the new legislation, any new application would likely be processed under the NEA, requiring compliance with both NEA requirements and the WEPS.
- Processing under the NEA may offer benefits such as simplified consenting and reduced assessment burden, though the detailed implications are still uncertain pending Select Committee process and the final legislation.

Forward Programme

25 March 2026

- Council determine:
  - List of options to progress,
  - Adaptive management approach, and
  - Approve public engagement.

April to July 2026

- Decision making framework finalisation,
- Iwi engagement,
- Public engagement, and compilation of responses,
- Technical option development.
- Develop cost estimates.

July 2026

- Prepare Council paper for option selection (BPO decision)

Q3/Q4 2026

- Council make decision on option selection (BPO decision)

Questions & General Discussion