NRW have said they can screen out the requirement for a HRA as we are utilising the existing permits already in place and take a favourable view on upgrading the existing septic tanks to WTP's.

NRW general guidance is :

Each development should be considered on a case by case basis. Developments should first be screened to determine whether they are likely to have a significant effect.

With no pathway for impacts, the development can be screened out as not likely to have a significant effect on the SAC in relation to phosphate inputs. Therefore, there is no need to progress further with the HRA, unless there are other potential impact pathways associated with the development which need to be considered.

The following types of development are unlikely to increase phosphate inputs:
• Any development that does not increase the volume or concentration of wastewater;
• Any development which improves existing water quality discharges by reducing the phosphate load of wastewater, or by decreasing the volume of wastewater produced (e.g. by improvements to existing wastewater treatment infrastructure);
• Any development connecting to a public wastewater treatment works where the permit has phosphate conditions in place and the sewerage undertaker has confirmed that there is capacity to treat the additional wastewater and the additional phosphate from the proposed development;
• Private sewage treatment systems discharging domestic wastewater to ground which are located more than 50m from a SAC boundary, and which have a maximum daily discharge rate of less than 2 cubic metres (m^3);
• Development to an existing residential property (e.g. extensions) that does not increase the volume of foul drainage (e.g. as a result of increased occupancy).

I assume the screening process will involve NRW reviewing our latest submission and based on previous discussions Pauline said they should be able to screen out the need for a HRA which presumably is just responding to planning saying the no longer object. However, as with most planning processes in Wales it seems to be down to interpretation of the guidance and who's reviewing the application