

Noise Management Plan

First Milk Haverfordwest Creamery

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SHE-POL-16	5	29/01/2025	Neil Shawcross	Haverfordwest

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1. Introduction

Following issue of the consolidated Environmental Permit (Ref: XP3830UR) by Natural Resources Wales (NRW) and subsequent regulatory inspections, the facility is required to produce a standalone Noise Management Plan (NMP). NRW requires that the NMP is in accordance with Environmental Agency (EA) online guidance “Noise and Vibration Management: Environmental Permits” and addresses the delivery of all relevant Food and Drink Sector Best Available Techniques (BAT) Conclusions.

The purpose of the NMP is to demonstrate that the control of noise has been taken into account in the operation of the permitted installation. This NMP is therefore a working document and is updated and refined as required throughout the operation of the Facility. The NMP forms an integral part of the site Environmental Management System (EMS) and operational staff have easy access to the document. Further to this the NMP sets out operational arrangements to control and mitigate noise from the Facility, made available to all operational staff working at the Facility.

In developing this NMP, First Milk understands its responsibilities for controlling noise generated by the Facility and is committed to ensuring that its operations do not result in unacceptable noise impacts at off-site receptors. First Milk is committed to ensuring that all noise control equipment is designed, operated and maintained appropriately to ensure that noise is effectively controlled at all times.

First Milk will undertake regular and periodic review including scheduled annual reviews of the NMP (see Appendix 3) to ensure that it is effective at controlling noise and mitigating the impact of noise generated by the Facility. The NMP will updated to include for the activities arising as a result of the proposed forthcoming EPR permit variation.

1.1 Report structure

This report has the following structure broadly in line with the guidance provided by the Environment Agency, as referred to by NRW:

Section 2	Details of the site location including site address are presented in section 2.
Section 3	Review of sources, pathways and receptors are presented in section
Section 4	A noise risk assessment including measures for noise management at the Facility
Section 5	Noise monitoring at the site
Section 6	Further details on the reporting and complaints procedures implemented at the Facility
Section 7	Actions in the case that unacceptable noise has been monitored or complaints have been received
Section 8	Improvements

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2. Site Location and Description

2.1 The site

First Milk Haverfordwest Creamery is a cheese manufacturing installation located at Pembroke Road, Merlin's Bridge, Haverfordwest, SA61 1JN approximately 800m south of Haverfordwest town centre (National Grid reference 194882, 214503) as shown in Figure 1.

Figure 1: Site Location



The installation comprises an irregular plot of land occupying an area of approximately 6 hectares within area of generally mixed-use development on the edge of the centre of Haverfordwest. The site is understood to have been developed as a factory in the 1960s/1970s, which was expanded throughout the 2000s and 2010s. The site's Environmental Permit was applied for and determined in 2005, with notable additions to permitted processes in 2013 for an effluent treatment plant; and in 2019 for medium combustion plant.

In summary, the installation is a cheese manufacturing facility processing raw milk into cheese which is despatched product to an off installation third-party storage facility. As part of the process, the site produces several co-products such as cream and concentrated whey which are despatched to customers for ongoing processing within their operations. Deliveries of milk are accepted at the site via tanker from farms and the end products are despatched from site via HGV's and tankers. As part of the site's operation there is an effluent

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treatment plant (ETP) located to the east of the site which accepts effluent from the sites drainage system for treatment before it is ultimately discharged to the River Cleddau.

The installation is operated in accordance with the extant varied and consolidated permit EPR ref XP3830UR. The site is manned and operational on a 24-hour-a-day basis. A full summary of operations is detailed within the permit and documentation submitted to NRW.

Site Setting

The site is bounded by Merlin's Brook which forms the northern perimeter of the site with the A4076 immediately beyond this. The eastern perimeter is open ground with Dwr Cymru wastewater treatment plan beyond. To the immediate south of the Site across the adjacent Milford Haven-Carmarthen railway line are residential properties at Jenkins Close and a residential care home with commercial and residential properties centred around Pembroke Road and Magdalen Street to the west which border the site.

The topography of the site and surrounding area slopes towards the north of the site.

The Installation location in the context of the wider area is shown in Figure 2.

Figure 2: Installation location in the context of the wider area



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3. Review of Noise Sources, Pathways and Receptors

3.1 Noise

Emissions of noise radiating from the operation of the Facility (for example, regular 'drone' type noise, impacts from movement of vehicles and materials and tonal noise from reversing alarms) can give rise to annoyance at local resident properties and affect their enjoyment of their homes and gardens. Long-term exposure to high levels of noise pollution can cause nuisance resulting in sleep disturbance, anxiety and stress and can therefore affect health.

3.2 Potential noise sources

In summary, the main noise contribution from the site occurs during operation of the plant due to; vehicle traffic, loading/unloading of HGVs and the operation of boilers/CHP, creamery plant and machinery in addition to the ETP that serves the site. Food safety requires that all processing machinery is housed within buildings at the site.

The management of the Facility is split into area/departments. A register of noise sources within the Facility is contained in Appendix 1 and 2. This includes details of the noise source and has been used to inform the qualitative Noise Impact Risk Assessment. This includes potential noise associated with raw materials, the production process, maintenance, abnormal activities and waste management for each area. This noise register is linked to the site's aspect register (which forms part of the EMS). In addition, all noise producing assets are further controlled through a defined maintenance frequency for each relevant piece of equipment in the Planned Preventative Maintenance (PPM) schedule.

3.3 Noise Impact Assessment

A quantitative Noise Impact Assessment is important to . quantify the impact of noise emissions from the Facility at offsite receptors and be used to identify the main sources of noise from the Facility. This will be used to identify and inform the site noise improvement programme to minimise noise impacts on the local environment going forward.

3.4 Pathways

Airborne noise (i.e. the spreading of sound energy) radiated from plant, vehicles and plant buildings on site has the potential to be transferred to nearby receptors through the air. The extent to which the noise is perceptible or where it becomes a nuisance at sensitive receptors is dependent upon the pathway. This is influenced by the separation distance, wind direction, wind speed, frequency of sound, obstructions along the pathway, type of ground cover, meteorological conditions, height of noise source and receptor above ground level, and the size and characteristics of the noise source.

3.5 Receptors

A human sensitive receptor is any location where a person may experience perceptible site noise which causes adverse impacts or annoyance or nuisance in accordance with relevant noise guidance and standards.

Site Personnel and visitors

Personnel/operatives working on site are the closest receptors to any noise and vibration produced on site, however due to consistent working conditions it may be unlikely that operatives would be particularly sensitive to noise and vibration. Personal Protective Equipment (PPE) is made available where appropriate.

It is unlikely that noise and vibration from the installation will cause nuisance or distress to visitors to the site. However, all visitors shall be made aware of the nature of the site operations. PPE shall be made available where appropriate in line with the site rules.

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Neighbours

Neighbouring sites and businesses are likely to be the most sensitive receptors to noise and vibration nuisances especially those not operating industrial or commercial facilities where noise generating plant/equipment is used. Good relationships with neighbouring landowners and businesses are essential to anticipate potential problems and avoid them, where possible, to avoid any cause of complaint.

Sensitive human receptors can include:

- Residential dwellings;
- Schools;
- Hospitals;
- Care homes;
- Childcare facilities;
- Hotels;
- Gardens (where relevant public exposure is likely i.e. excluding extremities of gardens or front gardens); and
- Sensitive commercial premises which may include for example, an office environment.

For the Facility, there are several receptors located within the vicinity of the installation. Below is a list of potential noise receptors beyond the installation and a diagram showing locations of receptors.

Table 1: Receptors

Ref	Receptor	Location (direction from site)	Approx. distance to the site boundary	Category
R1	Pembroke Road	West of the site	50m	Residential & Commercial
R2	Pembrokeshire College	Northwest of the site Across the Merlin's Bridge roundabout	300m	Educational
R3	Dwellings on Merlin's Hill	Northwest of the site Across the A4076 and Merlin's Bridge roundabout	320m	Residential
R4	Dwellings in "Poet's Corner e.g. Shakespeare Close	Northeast of the site Across the A4076	390m	Residential
R5	Dwellings on Jenkins Close	Southeast of the site Across the adjacent railway line (Milford Haven-Carmarthen)	100m	Residential
R6	Dwellings on Pembroke Road inc residential home and Merlin's Bridge Village Hall.	South of the site	35m	Residential
R7	Merlin's Bridge Village Hall.	South of the site	130m	Public use

The receptors used within this NMP provide a good cross-section of receptor locations which are either in proximity to the site and at greater distance where noise may be perceptible. It is recognised that they are not an exhaustive list and that consideration of noise levels in other residential areas around the Facility may also need to be considered, as required.

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There are no ecological receptors considered to be sensitive to noise within 1 km of the installation boundary.

In consideration of its potential to impact on and off-site receptors First Milk shall ensure:

- That the site is generally open to contact from both site personnel and neighbours with contact details shown on signage at the site entrance. First Milk don't believe there is a need to engage further at this stage with the community.. That said, would of course remain open to anyone who approached them and would always engage on that basis seeking to ensure relationships are maintained.
- That any complaints are recorded and that problems, where possible, are dealt with promptly as set out in the relevant section in this document.

Figure 3: Receptor locations



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4. Noise Management

4.1 Responsibility for implementation of this plan

This NMP is working document. Initially, it is intended to demonstrate that the control of noise has been considered as part of the day-to-day operation of the Facility. First Milk has responsibility for the implementation, reviewing and updating of the NMP. Reviews are undertaken on an annual basis, whenever new equipment or mitigation measures are implemented at the Facility or following the receipt of complaints.

The schedule of programmed review dates is listed in Appendix 3.

First Milk aims to ensure that any persons performing tasks for it, or on its behalf, which have the potential to cause significant environmental impact, are competent on the basis of appropriate education and training or experience. Key management roles at the Facility include the Safety, Health and Environment (SHE) Department, the Departmental Managers and the Site Director. The SHE Department Management are responsible for ensuring that procedures are in place for noise management on site and responsible for responding to and investigating off-site environmental noise complaints. The Departmental Managers are responsible for ensuring that noise control measures are in place in their department, and for investigating any justified environmental complaints that have been caused by noise originating in their department and putting in place mitigation measures as appropriate. The managers are responsible for ensuring that all employees are fully trained on noise control, with all employees at the Facility responsible for following the company procedures.

Noise control and NMP awareness training takes place at employee induction.

Systems to provide training for relevant staff is provided. Training requirements and records for staff are documented and recorded as part of the site training matrices at the facility. Relevant documents include:

- Site Induction within which is included a section on Environmental Noise
- SOP-ENV-004 Environmental Noise
- Site Contractor induction within which is included a section on Environmental Noise

Where noise is generated by contractors working at the Facility, First Milk acknowledges responsibility for ensuring that noise impacts are minimised. This includes providing contractors details of the health and safety risks on site and the procedures which need to be complied with. Contractors are required to confirm that they will adhere to the site rules and pass the site induction prior to working on site. Where a contractor has been found not to comply with the site rules, escalation procedures are in place and repeat offenders refused access to the site.

4.2 Control of noise

The key sources of noise emissions have been referred to in section 3 and are listed in Appendix 1. Control of the impact of noise involves the treatment of the noise at source (e.g. via enclosing, or method of operation, replacement, maintenance, monitoring and review).

The overall approach taken to managing noise includes the following steps:

- Identify all noise sources within the site by conducting a noise survey. The most recent survey has been undertaken in 2024 and has informed the current NMP.
- Assess noise levels by measurement of the identified noise sources. This has been undertaken in April and May 2024 and has informed the current NMP.
- Determine the regulatory requirements for the site. This has been completed and is included in the most recent Noise Impact Assessment report from 2024 and has informed the current NMP.
- Determine the most significant noise sources on-site and at sensitive receptors off-site. These have been determined and are presented in the most recent Noise Impact Assessment report from June 2024 and have been used to inform the current NMP. Any further significant sources if arising will be determined during annual review and monitoring and / or in response to complaints or site observations as applicable.

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- Apply a noise reduction programme which includes the use of noise mapping and propagation, evaluation of most cost-effective measures and their implementation. This is ongoing with the most recent elements having been included as recommendations in the most recent Noise Impact Assessment report from June 2024 and has informed the current NMP.
- Consider techniques for the reduction of noise at source and the site level (e.g. enclosing noisy plant, soundproofing buildings, use of silencers, keeping doors closed, regular maintenance, screening methods, limiting outdoor night-time activities where practicable and limiting speed). This is ongoing with the most recent recommendations included in the most recent Noise Impact Assessment report from June 2024 and has informed the current NMP.
- 6 monthly monitoring of noise levels to ensure they are within regulatory limits at sensitive receptors where if these are applicable. This has been put in place as part of this NMP. A list of pre-scheduled dates is presented in Appendix 3. A pro forma for recording observations is included in Appendix 4.
- Review and update the noise management plan to ensure it remains effective and up to date with current regulations and Best Available Techniques relevant to the Food and Drink generally and Milk sector specifically. This will be undertaken at annual review considering interim observations and records from the previous year.

Appendix 1 and 2 includes a summary description and consideration of the general mitigation/control measures that are in place at the Facility to prevent, reduce and/or mitigate against noise emissions. Appendix 1 and 2 is reviewed by management as part of annual periodic reviews of the NMP as per the schedule in Appendix 3 and in interim periods as required. This ensures that sources and receptors of noise are regularly examined, so that there are no 'gaps' in abating the noise at the Facility, and as part of First Milk's aim of continual improvement.

4.2.1 Permit Requirements

The Facility has an EPR to operate. Section 3.4 of the EP includes conditions regarding the 3.4 Noise and vibration with 3.4.1 stating that *'Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration'*.

Therefore, the EPR controls emissions from all activities on-site as such, to comply with the requirements of the EP permit, there are a number of noise emissions control measures in place at the Facility, including both physical measures and management techniques. These are detailed below.

4.2.3 Appropriate measures and best available techniques (BAT)

In respect of the EU BAT Reference Document for the Food and Drink Sector the associated BAT Conclusions for the site, the site's response below is provided.

In order to prevent or, where that is not practicable, to reduce noise emissions, BAT 14 is to use one or a combination of the techniques given below (prevention / point source reduction / site level reduction):

(a) Appropriate location of equipment and buildings

Due to the layout and location of the installation there is not much opportunity to maximise distance between noise emitters and receptors. Plant or equipment with the greatest potential to create excessive noise is internal or enclosed (e.g. compressors, boilers, CHP, all main processing equipment). The site exercises a range of noise management measures in line with its NMP.

When installing new plant, noise is taken into consideration and plant is designed in order to minimise noise off-site. Noise surveys are carried out as part of planning applications prior to installation to assess the impact of any new plant to the surrounding areas.

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(b) Operational measures

Plant and equipment is subject to annual PPM and condition-based inspection that would detect abnormalities in operation that could lead to excessive noise. There is no specific noise abatement equipment. A combination of management techniques, housekeeping, monitoring, maintenance and inspection are used in combination to minimise noise. Various primarily operational measures are in place to control noise emitted from the site, particularly during the night; personnel are inducted and reminded of the sensitivity of neighbouring residents and the need to follow appropriate procedures external activity is reduced during the night. Noise is a consideration of the activities of contractors and projects and is routinely assessed as part of the evaluation of RAMS during planned and reactive construction and maintenance activities. All areas of the site are subject to inspection and process confirmation audits that would identify abnormal operations/activities that may give rise to noise nuisance potential.

(c) Low-noise equipment

Consideration of noise is part of the part of equipment specification which would identify opportunities to include the requirement for low noise equipment such as fans, pumps and compressors where this is applicable for both temporary and / or new equipment.

(d) Noise control equipment and (e) Noise abatement

Consideration of noise is part of the part of the change management process and in the design brief for new installations (including specification of building fabric in addition to the location and layout of process and ancillary equipment). Environmental noise would be driven by the need to meet both planning and permitting requirements which, if the need for a technical assessment is demonstrated, would identify noise control and mitigation methods to address noise nuisance potential.

In addition to the general sector BAT points the following good practice techniques are considered relevant:

(i) Performing regular noise surveys with monitoring of noise levels outside the site boundaries;

Qualitative noise monitoring is carried out as detailed in Section 5.2 at various locations within the local area. These points take into account sensitive receptors as, being located where noise from the plant has the potential to cause a nuisance (e.g. residential population, or sensitive receptors). A list of pre-scheduled noise monitoring dates is given in Appendix 3. Appendix 4 gives an example pro-forma for recording noise monitoring observations.

(ii) Enclosing noisy equipment in housing or by encapsulation and by soundproofing buildings;

For plant and equipment outside of buildings, the aim is to reduce noise levels to as reasonably practicable. This is carried out for new plant by careful selection of plant and equipment.

(iii) Decoupling individual equipment to pre-empt and limit propagation of vibrations and resonance noise;

Regular condition monitoring is carried out on large plant assets to inform planned preventative maintenance work and minimise noise emitted from motors, fans etc. Large plant assets are also fitted with continuous vibration monitoring that causes plant shutdown should vibrational set points be exceeded.

(iv) Point source insulation using silencer, damping, attenuators on noise sources, e.g. fans, acoustic vents, mufflers, and acoustic enclosures of filters;

Equipment that produces a high level of noise is generally fitted with noise reduction devices to lessen any off-site impact (e.g. CHP acoustic enclosure). Careful consideration is taken in selecting the correct device for the plant.

(v) Keeping gates and doors closed at all times when not in use.

The installation operates a closed door policy in line with food safety standards. Most factory doors are self-closing which will reduce noise nuisance potential.

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(vi) *Reducing noise from traffic by limiting the speed of internal traffic and for trucks entering the site;*

The on-site speed limit is enforced. All vehicles entering the site must obey local signage and near miss reporting is used to identify any vehicles that may be exceeding the speed limits. Any issues with external hauliers would be dealt with by the Despatch contacting the specific haulier with complaints.

(i) *Limiting outdoor activities during the night;*

Outdoor activities that may have an impact off-site are reduced.

4.3 Noise Risk Assessment and mitigation

Appendix 1 and 2 provides detail of each of the noise sources within each department and the potential impact they could have on local receptors. The table include measures used to manage the risk and the overall perceived risk. The perceived overall risk is 'insignificant', 'not significant' or 'significant' in line with the EA's H1 guidance.

4.3.3 Specific noise prevention equipment

Other than the acoustic enclosure around the CHP engine there is no specific noise prevention equipment employed on site.

4.3.4 Noise Risk Assessment Summary

The risk assessment and management measures (Appendix 1) have shown that the perceived risk of noise from the Facility is 'not significant' or 'insignificant'. Should the monitoring (see section 5) or complaints procedure (see section 6) prove otherwise, appropriate action will be taken to identify and stop the source of the noise. Following this, the risk assessment and NMP will be reviewed and updated accordingly to ensure its effectiveness.

4.4 Abnormal operations

The above sections consider normal operations. It is possible that abnormal operations (equipment failure, weather, emergencies), could increase the risk of noise impacts. Management for the following abnormal situations is as follows.

Table 2 Abnormal Operations

Event	Location	Likely Effect	Response Measures	Timescale for Response
Loss of electrical supply	Site-wide	Back-up generators startup to allow safe plant shutdown	Back-up generators and pumps are located in enclosed areas.	Immediate, for length of outage. Reliance on diesel generation for long periods is not economically viable
Prolonged power outage	Site-wide	Emergency generators brought onto site	Suitable location selected for generators on a case-by-case basis. Off-site monitoring to ensure generators do not increase noise levels. Contact sensitive receptors to give indication of length of outage.	Immediate, for length of outage. Reliance on diesel generation for long periods is not economically viable

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Event	Location	Likely Effect	Response Measures	Timescale for Response
Fire / emergency	Site-wide	Prolonged sounding of the site fire/Ammonia alarms	Alarms are sounded until the Incident Commander is satisfied that the situation is safe	Immediate
Emergency venting of process emissions	Site-wide	Reverberation through the stacks may change the noise profile	Certain instances may require the use of stacks for a short duration to enable safe shutdown of processes however the air flow expected is no greater than under normal operations. Short term so no requirement for receiver contact.	Immediate
Emergency venting of pressure through PRVs	Pressure vessels and associated systems	Venting through PRV for short duration – as above	As above	As above
Equipment failure	Site-wide	Potential for short duration impulse noise to be generated	Process stopped for safety reasons Short term so no requirement for receiver contact.	Immediate

4.5 Management of change

When equipment is to be replaced a decision is made as to whether to replace like-for-like or whether different equipment is more appropriate. As part of this decision-making process consideration is made of noise impacts of the equipment and whether an alternative option could be used which would reduce off-site noise impacts.

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5. Monitoring

5.1 Environmental Management System

This NMP forms part of the EMS and is reviewed and updated accordingly. The EMS includes procedures for managing external complaints. Further detail on the complaints procedures at the Facility are presented within section 6.

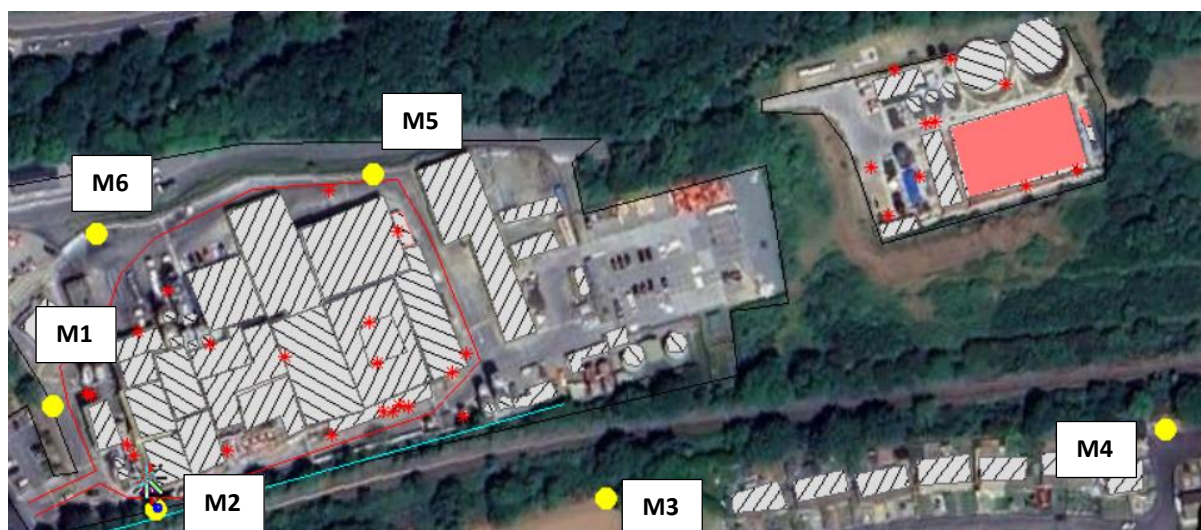
5.2 Noise monitoring

This NMP forms part of the EMS and is reviewed and updated accordingly. Noise monitoring is conducted by the EHS Team.

As a result of the considered low likelihood or impact and the lack of a significant history of noise complaints the site, an extensive noise monitoring regime is not considered appropriate or proportionate. It is considered that generally there is a low likelihood of any adverse impact from noise to nearby sensitive receptors.

The site is in an area influenced by road noise from the A4076 and the adjacent railway line. Each of these transport routes separates the site from most of its receptors. However, in order to ensure that the noise levels emitted by the site continue to be of a relatively low level a monitoring program of periodic noise assessments around the site boundary shall be conducted. A plan of the sampling points is detailed in the map below.

Figure 4 – noise monitoring locations:



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Table 3 Monitoring Positions

Position	Location	Expected Noise Level Range (from noise model) dB(A) Leq 15 minutes	Expected Dominant Noise Sources (See Appendix 1)
M1	Circa 13.5m in front of Main Evaporator	51-57	Main Evaporator NSA, CHP Plant NSM NSN NSO, Truck Movements NSG
M2	Circa 10m from CHP Plant	59-65	CHP Plant NSM NSN NSO
M3	North-east corner of Playing Fields (exclude rail pass-by activity)	42-48	Roof Condenser Fan Rack NSL, Twin Primary DAF Pumps (ETP) NSI, CIP Kitchen Pumps, Nitric Pressure Release, Roof Louvre unit, Former Block Plant Louvre
M4	Close opposite 27 Jenkins Close Haverfordwest by rail line (exclude rail pass-by activity)	37-43	ETP Compressors NSH, Roof Condenser Fan Rack NSL
M5	Directly opposite north-east corner of stores at circa 8m distance	61-67	Stores plant room louvres NSF, Truck movements NSG, Refrigerated Unit Charging Point
M6	At circa 35m from milk intake pumps	46-52	Milk intake pumps NSC, Main Evaporator NSA, Roof air Handling Unit, Truck Movements NSG

Noise monitoring is scheduled in at 6 monthly intervals given the current low risk associated with noise at the site. Pre-scheduled noise monitoring dates are given in Appendix 3. A pro-forma to be used for noise monitoring is presented in Appendix 4. A procedure and instruction for using the sound meter is found in Appendix 7.

Where noise levels in excess of 5dB greater than the upper limit in the above expected ranges are measured then the cause for this shall be investigated and recorded on the noise monitoring form for review and action if required.

Where noise levels in excess of 10dB greater than the upper limit in the above expected ranges are measured then the cause for this shall be investigated and recorded on the noise monitoring form for review and action if required. If a means of resolution is not immediately evident and able to be actioned then temporary mitigation measures will need to be put in place and residents at the most affected receiver as identified in the form will need to be informed of the situation and of actions being undertaken (see Section 7 below).

Noise monitoring, when carried out, shall not be done during adverse weather conditions so as not to affect the results.

The noise monitoring shall be carried out using a simple noise meter or noise meter app to give indicative noise values for the site.

The site shall remain open to the potential that should conditions or operations at the site alter significantly there may be a need to review the current noise monitoring regime and amend accordingly. This will be reviewed during the annual NMP review.

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In the event that the site receives a verified noise complaint a noise assessment shall be undertaken.

5.3 Noise monitoring record keeping

Records of noise monitoring are kept in within the site EMS. Monitoring records (see Appendix 4) will be reviewed within the annual review of the NMP (see Appendix 3 for list of review dates) with the aim of improving noise management measures at the site and reducing any significant noise levels.

5.4 Reporting of data

Reporting of data to NRW is undertaken as required in accordance with the conditions of the EPR permit for the Facility. Any complaints received are reported to NRW in accordance with the reporting and complaints procedure for the site – refer to section 6 for further details.

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6. Reporting and Complaints Response

The measures outlined in this NMP are aimed at preventing emissions of noise to the extent where complaints may be made by nearby sensitive receptors. Nevertheless, it is considered that having an established complaints procedure is an essential part of implementing a successful NMP.

As such, the EMS includes procedures for managing external complaints. This includes for complaints in relation to noise emissions from the Facility. The procedures include those for the recording of the initial complaint, the approach to investigation of the possible cause, and determination of actions to prevent recurrence. This aligns with the requirements of the EPR permit.

The SHE Department Management are responsible for ensuring that procedures are in place for noise management on site and responsible for responding to and investigating off-site environmental noise complaints. The Departmental Managers are responsible for logging any complaints received in the site's incident reporting system, with NRW informed within 2 hours following receipt of a complaint. They are also responsible for submitting a short report to NRW detailing the complaint and whether any remedial actions have been implemented.

Receipt of complaints:

Response to identification of elevated noise levels

Elevated levels of noise may be identified either by site operational staff or by the receipt of a noise complaint from a third party suggesting there may be excessive noise from the operations at the First Milk creamery.

This section details the contingency measures in place to identify the source of elevated noise levels, bring the noise levels back under control and minimize their impact.

Receipt of complaints

Members of the public can contact the First Milk creamery with any noise or vibration complaints by the following means:

- By telephone, calling the main switchboard number. Callers to the main First Milk number (published online 0141 887 6111) would be directed to site via the call handler.
- By letter.
- In person, by attending the reception at the site.

Members of the public are also able to contact NRW or the Local Authority with any noise or vibration complaints about the site.

Once a complaint has been received and the details collected, the complaint will be processed in the manner outlined in the section below.

Public comments, complaints and concerns could be received by email, telephone or letter, either directly to the site or via the relevant authorities (such as the Local Planning Authority or NRW). First Milk aims to respond to complaints within 2 working days of receipt, with a maximum time of 7 days implemented to respond to a complaint.

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Management of complaints:

Complaint registration

The site will maintain a record of all complaints received. Such complaints will be recorded on the “Hav Noise & ETP Odour Tracker”.

Complaints will be collated by the site SHE Manager and all new complaints escalated for the immediate attention of the SMT with actions to investigate and progress with close out reviewed as part of the Daily Review Meeting schedules as appropriate.

Collecting complaint details.

Wherever possible, the following information will be attempted to be collected for each complaint:

- The time and date when the offensive noise was observed;
- The location where the offensive noise was observed, (e.g. postal address, grid reference);
- The complainant’s description of noise. This should include a subjective description of all the factors necessary to assess the impact of the noise, including intensity, character, relative unpleasantness (pleasant, unpleasant, or neutral), frequency and duration;
- The identity of the complainant, if possible, to assess the repeated nature of complaints;
- The residential address of the complainant; and
- Any other information the complainant can offer on activities at the alleged noise source

The noise complaint report form is presented in Appendix 5.

Investigating noise complaints.

This response procedure sets out what investigative actions will be taken in response to a complaint. The aim of the investigative actions will be to establish:

- The source of the noise complaint; and
- The impact of the noise

The investigation will start with an initial screening of the complaint. If the screening process fails to confirm the noise incident, then the investigation will stop at that point. If the screening process confirms the noise incident, then a more detailed investigation is carried out.

The object of the initial screening is to quickly screen out those noise complaints that are unlikely to be due to operations at the First Milk site, perhaps because they result from some other activities in the area.

The initial screening exercise will consider the following:

- knowledge of potential sources at the First Milk site (including work activities in progress, any technical problems, etc.)
- knowledge of potential sources in the locality other than First Milk
- wind direction at the time of the alleged noise episode (if known)
- distance and location of the complainant in relation to the site.

If the initial screening concludes that First Milk could be the source of the noise complaint, then further investigation will be carried out, which will either 'confirm' and 'further characterise' the noise incident as being due to activities at First Milk, or it will 'fail to confirm' the incident.

In the event that there is an identified noise source from the Creamery causing complaints, this shall be discussed in the next appropriate management meeting and any potential actions to minimise the noise discussed and agreed.

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7. Actions

During correct operation of the equipment noise adverse impacts are not expected. An increase or change in noise is typically associated with a failure of equipment and highlights a process issue.

Should there be any unacceptable emissions of noise identified by monitoring, a complaint, or departmental managers, the source and reason for the noise will be stopped and investigated and any relevant mitigation or further control measures arranged. Unacceptable noise emissions would be considered to be found to be 10dB or more in excess of the expected levels presented in Table 4 previously. The SHE team will identify the relevant departmental manager and action will be taken. Under certain abnormal operations direction will be sought from the Site lead. This may involve the shut-down of operations causing the noise until a suitable mitigation measure can be put into place. However, a judgement will need to be made to ensure that any equipment can be safely shut-down. NRW may also request the cessation of a noise source due to their investigation / response to complaints.

The source and mitigation measures will be monitored by the departmental managers for as long as necessary to ensure that the mitigation measures have been successful and the unacceptable noise has been halted. This may also warrant additional noise monitoring at off-site receptors for a period of time that provides reassurance that the measures implemented are sufficient.

8. Improvements

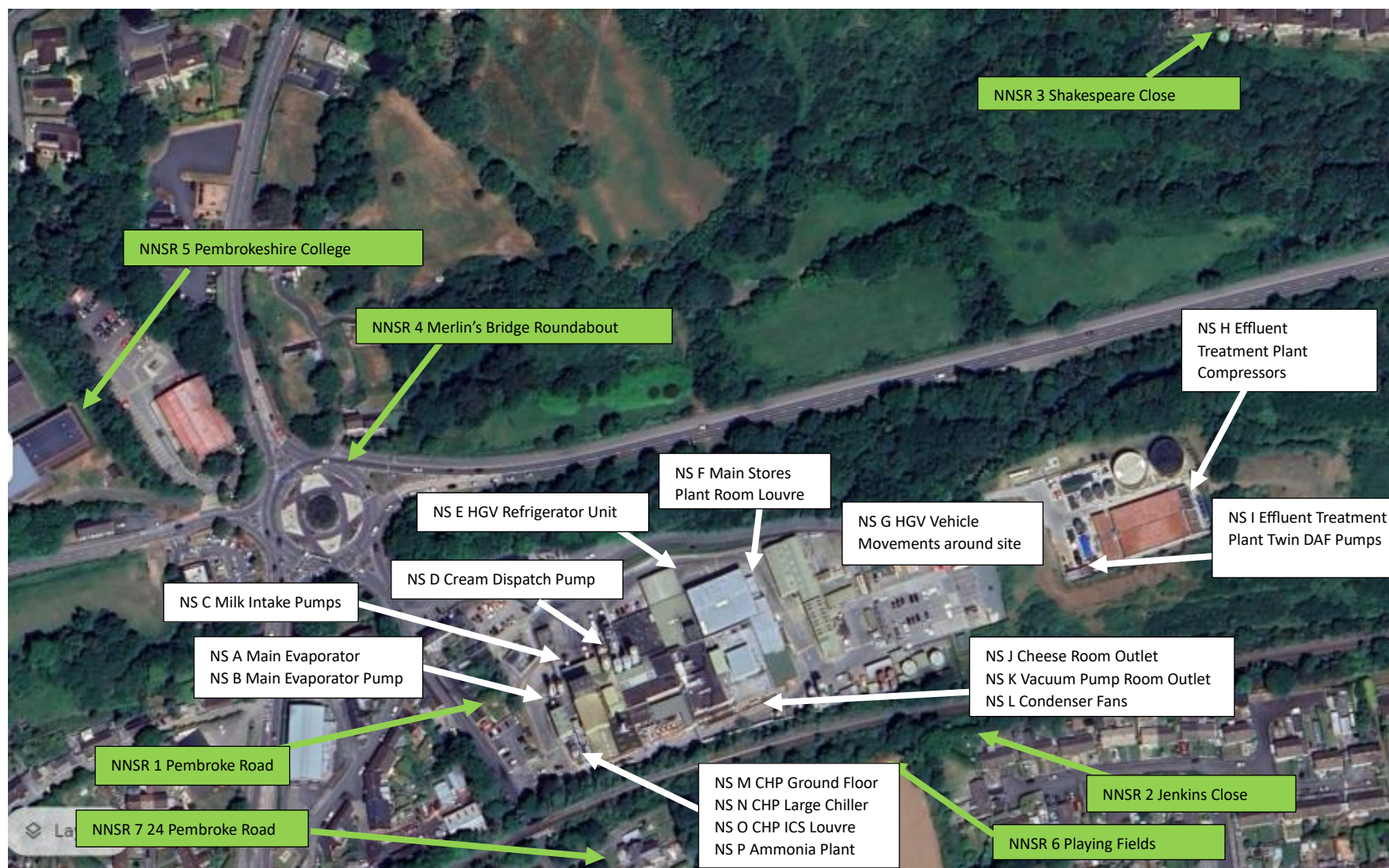
Improvements will be identified following each annual review of the NMP.

9. Summary

This NMP has been prepared to set out operational procedures to control and mitigate noise from the Facility. It is to be refined and updated on an annual basis as part of periodic reviews of the documented management systems at the Facility. Reviews will serve to confirm the identification of any new sensitive receptors, sources of noise, monitoring equipment or changes to relevant procedures (such as complaints handling and reporting).

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Appendix 1 Noise Source (NS) and Nearest Noise Sensitive Receiver (NNSR) Map



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Appendix 2 Quantitative and Qualitative Noise Impact Assessment

(Based on PDA Ltd Noise Impact Assessment J004852-7849-02 May 2024)

Noise Source	Pattern of Release	Contribution to overall impact	Likelihood	Inherent Risk	Control Measures in Place	Residual Overall Risk	Noise Action Plan	Responsible Person	Noise Sensitive Receiver NNSR
NS A Main Evaporator NSB Main Evaporator Pump	Continuously during hours of operation	High	Medium	High	All plant and equipment regularly maintained and inspected to ensure that the likelihood and actuality of items producing excessive noise is minimised. Pumps/fans/compressors will be housed within buildings and / or enclosed where possible. Regular periodic noise monitoring, Building doors to be kept closed. Continued NNSR liaison.	Medium	<i>See appendix 6</i>	EHS manager Site Lead Duty Manager	NNSR1 Pembroke Road
NS C Milk Intake Pump NS D Cream Dispatch Pump	As required during hours of operation.	Medium	High	Medium	Regular and periodic maintenance, inspection and noise monitoring. Pumps/fans/compressors will be housed within buildings and / or enclosed where possible.	Medium	<i>See appendix 6</i>	EHS manager Site Lead Duty Manager	NNSR1 Pembroke Road NNSR4 Merlin's Bridge Roundabout
NS E HGV Refrigerator Unit	As required during hours of operation.	Medium	High	Medium	Regular and periodic maintenance, inspection and noise monitoring.	Low	<i>None Required</i>	EHS manager Site Lead Duty Manager	NNSR4 Merlin's Bridge Roundabout
NS F Main Stores Plant Room Louvre	Continuously during hours of operation	Medium	High	Medium	Pumps/fans/compressors will be housed within buildings and / or enclosed where possible. Regular periodic maintenance, inspection and noise monitoring, Building doors to be kept closed.	Low	<i>None Required</i>	EHS manager Site Lead Duty Manager	NNSR4 Merlin's Bridge Roundabout NNSR2 Jenkin's Close
NS G Vehicle Movements Around Site	Continuously during hours of operation . Staff vehicles mainly at shift	Medium	High	Medium	Site / Driver Induction. Site rules, Number of HGVs and tankers limited to the amount needed to service the creamery. Speed limit at site to limit engine noise. Stereos / radios off or at low level.	Medium / Low	<i>None Required</i>	EHS manager Site Lead Duty Manager	All NNSRs

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Noise Source	Pattern of Release	Contribution to overall impact	Likelihood	Inherent Risk	Control Measures in Place	Residual Overall Risk	Noise Action Plan	Responsible Person	Noise Sensitive Receiver NNSR
	changeover times. Milk tankers 24/7 with peaks at 08:00 /10:00 /14:00 / 20:00 / 02:00 Cheese collections throughout 24 hr period. Packaging / Parts delivery typically during normal office hours.				Minimize use of horns Engines to be switched off when stationary and practical to do so and during delivery. Delivery tankers typically have their engines turned off during delivery. The “site” pumps are used rather than on board pumps. This is the case for the majority of the tankers that come to site to deliver. There is an exception to this which would be the “ex farm” tankers. Some of these have air valves fitted which require the engine to run. These account for a small proportion of the tankers that deliver to site One way traffic system. Instruction issued instructing staff to consider residents when arriving/departing/moving around the site				
NS H ETP Compressors	Continuously during hours of operation.	Medium	High	Medium / Low	Pumps/fans/compressors will be housed within buildings and / or enclosed or shielded where possible. Regular periodic maintenance, inspection and noise monitoring,	Low	<i>None Required</i>	EHS manager Site Lead Duty Manager	NNSR3 Shakespeare Close NNSR2 Jenkin’s Close
NS I ETP Twin DAF Pumps	Continuously during hours of operation.	Medium	High	Medium / Low	Pumps/fans/compressors will be housed within buildings and / or enclosed or shielded where possible. Regular periodic maintenance, inspection and noise monitoring,	Low	<i>None Required</i>	EHS manager Site Lead Duty Manager	NNSR3 Shakespeare Close NNSR2 Jenkin’s Close
NS J Cheese Room Outlet	Continuously during hours of operation	Medium	High	Medium	Regular periodic maintenance, inspection and noise monitoring,	Medium	<i>See appendix 6</i>	EHS manager Site Lead Duty Manager	NNSR2 Jenkin’s Close NNSR7 24 Pembroke Road
NS K Vacuum Pump Room Outlet	Continuously during hours of operation	Medium	High	Medium	Regular periodic maintenance, inspection and noise monitoring,	Medium	<i>See appendix 6</i>	EHS manager Site Lead Duty Manager	NNSR2 Jenkin’s Close NNSR7 24 Pembroke Road

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Noise Source	Pattern of Release	Contribution to overall impact	Likelihood	Inherent Risk	Control Measures in Place	Residual Overall Risk	Noise Action Plan	Responsible Person	Noise Sensitive Receiver NNSR
NS L Condenser Fans	Continuously during hours of operation	Medium	High	Medium	Regular periodic maintenance, inspection and noise monitoring,	Low	<i>None Required</i>	EHS manager Site Lead Duty Manager	NNSR2 Jenkin's Close NNSR7 24 Pembroke Road
NS M CHP Ground Floor NS N CHP Large Chiller NS O CHP ICS Louvre	Continuously during hours of operation	Medium	High	Medium	Equipment design specification Plant regularly maintained to ensure that the likelihood of items producing excessive noise is minimised. Engine housed within an acoustic enclosure. Regular periodic inspection and noise monitoring,	Low	<i>None Required</i>	EHS manager Site Lead Duty Manager	NNSR2 Jenkin's Close NNSR7 24 Pembroke Road
NS P Ammonia Plant	Continuously during hours of operation	Medium	Medium	Medium	All plant and equipment regularly maintained to ensure that the likelihood of items producing excessive noise is minimised. Maintenance and inspection by the on site Engineering team. Pumps/fans/compressors housed within buildings where it is possible to do so. Building doors to be kept closed.	Low	<i>None Required</i>	EHS Manager Site Lead Engineering Manager	NNSR2 Jenkin's Close NNSR7 24 Pembroke Road
General Dairy Operations	Continuously during hours of operation	Medium	Low	Low	All external doors / windows / roller doors kept shut to prevent escape of noise. Regular periodic inspection and noise monitoring,	Low	<i>None Required</i>	EHS manager Site Lead Duty Manager	All NNSRs

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Appendix 3 Key Scheduling Dates

1. List of pre-scheduled NMP Review Dates

08th August 2025

08th August 2026

08th August 2027

2. List of pre-scheduled noise monitoring dates

3rd September 2024

3rd March 2025

3rd September 2025

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Appendix 4 Pro-forma for recording noise monitoring observations

Noise Monitoring Record	
Noise Monitoring Position (M1,M2,M3,M4,M5,M6)	
Date of Observation:	
Time of Observation:	
Weather conditions (i.e. dry, rain, fog, snow):	
Temperature (none, light, steady, strong, gusting):	
Wind direction (e.g. from NE)	
Expected Dominant Noise Sources	
Measurement Device (E.g. Integrating Class 2 Sound Level Meter with Calibrator – for example Noise Meters CR310 with Noise Meters Class 2 Acoustic Calibrator)	
Measured Noise Level [dB(A) L_{eq} 15 minutes]	
Expected Noise Level Range [dB(A) L_{eq} 15 minutes]	
Is Noise Level within 5dB of Expected Range? Y/N	
Is Noise Level within 10dB of Expected Range? Y/N If Yes ...	
- Is there a character (e.g. tonal, impulsive, other)? Y/N If so which dominates?	
- Is there a clear source of the noise exceedance? Y/N Can it be easily resolved? Y/N	
- Does action need to be taken? Y/N If so what and when?	
Is Noise Level in excess of 10dB greater than Expected Range? Y/N If Yes ...	
- Is there a character (e.g. tonal, impulsive, other)? Y/N If so which dominates?	
- Is there a clear source of the noise exceedance? Y/N Can it be easily resolved?	
- Does action need to be taken? Y/N If so what and when?	
- Have temporary mitigation measures been put in place or arranged. Y/N If not why not?	
- Have most affected receivers been informed? Y/N If not why not?	

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Appendix 5 Noise Complaint Form

Noise Complaint Form		
Time and date of complaint:	Name and Address of Complainant:	
Telephone Number of Complainant:		
Date of Noise:		
Time of Noise:		
Weather conditions (i.e. dry, rain, fog, snow):		
Location of noise, if not at above address:		
Temperature (none, light, steady, strong, gusting):		
Wind direction (e.g. from NE)		
Complainant's description of noise:		
- What does it sound like.		
- Intensity (see below):		
- Duration (time):		
- Constant or intermittent		
- Does the complainant have any other comments about the noise?		
Are there any other complaints relating to the installation, or to that location? (either previously or relating to the same exposure).		
Any other relevant information:		
Do you accept that the noise is likely to be from your activities?		
Operating conditions at time the noise occurred (e.g. flow rate, pressure at inlet and pressure at outlet, vehicular operations, chiller duty etc.):		
Actions taken:		
Form completed by	Date:	Signed:

Intensity

0 No Noise

3 Distinct Noise

6 Extremely loud Noise

1 Very Faint Noise

4 Loud Noise

2 Faint Noise

5 Very loud Noise

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Appendix 6 Noise Reduction Programme / Action Plan

The following items have been identified as areas where the site can improve further its environmental noise impact.

These items shall be taken forward for Capex approval and then progressed by the Business Unit Projects Team.

The actions shall be tracked to completion by the site Senior Leadership Team.

Item no	Item / noise source	Action identified	Anticipated action date
1	NS A Main Evaporator (Cooling Tower 1)	Replacement of the current fans with specialist Whisper Quiet fans. This will provide approximately 10 dBA attenuation to sound from the pump at the nearest dwellings.	Q1 of 2025
2	Cooling Tower 1 Process Pumps	The construction of an acoustic enclosure of approximately 1.7m wide x 1.4m deep x 0.7m high comprised of removable panels. The acoustic enclosure will provide approximately 12 dBA attenuation to sound from the pump at the nearest dwellings.	Q1 of 2025
3	Cooling Tower 1	The construction of an acoustic barrier of approximately 19m wide x 2.4m high x 50mm thick which will be fixed to seven bays of the existing palisade perimeter fence. The acoustic barrier will provide approximately 5 to 10 dBA attenuation to sound from the yard at the nearest dwellings.	Q1 of 2025
4	NS C Milk Intake Pump	The acoustic enclosure will be approximately 0.6m wide x 1.5m deep x 1.1m high comprising removable panels. The acoustic enclosure will provide approximately 12 dBA attenuation to sound from the pump at the nearest dwellings.	Q1 of 2025
5	NS D Cream Despatch Pump (Milk intake pumps and Niro/12% silo process pumps)	The construction of an acoustic barrier of approximately 5.1m wide x 2.2m high x 70mm thick which will be located on the raised walkway adjacent to this area, immediately in front of the fall arrest barrier next to 12% Silo 1 adjacent to the pumps and behind big whey process flow plate. It is estimated that the acoustic barrier will provide circa 10 dBA attenuation to sound from the pumps at the nearest dwellings.	Q1 of 2025
6	NS J Cheese Room Outlet (Cream Room Extractor Fan)	The acoustic barrier will be approximately 1.5m wide x 1m high x 2.5m high located on the flat roof where the fan is located and braced back to the building wall from which the duct projects. It is estimated that the acoustic barrier will provide circa 10 dBA attenuation to sound from the pumps at the nearest dwellings.	Q1 of 2025
7	NS K Vacuum Pump Room Outlet	The attenuator will be approximately 2.4m wide x 0.25m deep x 0.9m high discharging air from the vacuum pump outlet to both sides through attenuated airways, with a full-length side lining to provide the attenuation and top/bottom casings to control noise breakout. The attenuator will provide approximately 15 dBA attenuation to sound from the vacuum pump at the nearest dwellings.	Q1 of 2025

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Appendix 7 Noise Monitoring Procedure

The following section details the noise monitoring procedure for the site. As noted in section 5.2 the site shall carry out noise monitoring at 6 monthly intervals.

Noise monitoring shall only be carried out by persons who have been trained against this document and in particular this appendix (7) as this defines what equipment to use, how to use it and what to do with the information once gathered. This shall typically be, although not necessarily restricted to, the SHE Manager or SHE Advisor roles at site.

Procedure

1. As outlined in section 5.2, noise monitoring shall take place at 6 monthly intervals with the intention being to determine if there is any significant noise issue that the site may wish to address before it becomes impactful to neighbouring receptors.
2. The noise equipment to be used shall be a dedicated sound level meter. The site has in its possession a Latnex SM-130DB Sound Level Meter which is held within the SHE department. This device is a digital noise meter an auto shifting function that can be applied to the measurements for both environmental and mechanical noise. This shall be the preferred equipment to be used.
3. Detailed instructions on its use are contained within this appendix with additional support for the device found at www.latnex.com.
4. The person carrying out the monitoring shall obtain 6x copies of Appendix 4 of this document sufficient to cover monitoring positions M1-M6.
5. The person carrying out the monitoring shall also make a note of the expected noise levels for each of the locations as a comparison will be made once monitoring begins.
6. The person shall position themselves at the first monitoring position as identified in figure 4 of section 5.2.
7. Appendix 4 shall be completed with details of the time, date location etc noted
8. Noise readings shall be taken at that position and recorded and the person shall complete the remainder of the appendix comparing the noise levels noted with that expected at the location.
9. Where noise levels in excess of 5dB greater than the upper limit in the above expected ranges are measured then the cause for this shall be investigated and recorded on the noise monitoring form for review and action if required.

Note: elevated noise levels do not necessarily mean that the First Milk creamery is the cause. The person carrying out the monitoring should assess the source of the dominant noise and note if it appears to be from the creamery or other noise source. For example, roadworks or other construction.

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10. Where noise levels in excess of 10dB greater than the upper limit in the above expected ranges are measured then the cause for this shall be investigated and recorded on the noise monitoring form for review and action if required.

Note: elevated noise levels do not necessarily mean that the First Milk creamery is the cause. The person carrying out the monitoring should assess the source of the dominant noise and note if it appears to be from the creamery or other noise source. For example, roadworks or other construction.

11. When the monitoring has been completed, the findings of the monitoring shall be communicated within the site Senior Leadership Team (SLT), discussed if required and any further actions discussed with the aim of minimising noise impact potential.

Note: If a means of resolution is not immediately evident and able to be actioned then temporary mitigation measures may need to be put in place and residents at the most affected receiver as identified in the form will need to be informed of the situation and of actions being undertaken.

It may be the case that it is appropriate to seek specialist acoustic advice if the noise source is not obvious or any potential solution appears complex.

12. Records of the monitoring carried out shall be saved within the site N drive by the SHE department.

How to use the equipment

** Please note that the complete user manual for the sound level meter is held within the site N drive **

Meter Description



1. Microphone
2. LCD display
3. A /C weighting select button
4. Power button
5. Maximum and Minimum hold button
6. Data hold button
7. Time weighting select button
8. Tripod nut
9. Battery cover
10. Windscreen

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Operation

- Press (I) to turn on or turn off
- By clicking A/C, select dBA for the measurement of acoustic noise (for analysis of mechanical noise select dBC)
- Select “FAST” to read the real-time noise level and “SLOW” to read the average noise level clicking “Fast/Slow” to do this.
- Press “Max” to capture the maximum or minimum noise level and to lock the readings.

Note:

Wind blowing across the microphone will bring in additional extraneous noise. As noted in section 5.2, noise monitoring, when carried out, shall not be done during adverse weather conditions so as not to affect the results.

- In the case of using the instrument in the presence of wind speed higher than 10m/s the windscreen must be mounted to prevent undesirable noise signals.
- In order to avoid the person carrying out the monitoring being caught out by changing weather conditions it is recommended that the windscreen be fitted to the device by default.



Preventing auto-off

- The meter is preset to shutdown automatically after 15-minute inactivity.
- When powering on, press (I) for 2 seconds to disable the auto shutdown function which can be set to “disable” or “enable” as needed.

Maximum and Minimum hold

- Click MAX for less than 1 second to view the maximum and minimum values cyclically, while pressing A/C and FAST/SLOW for switching frequency weighting and time weighting. Press and hold for more than 1 second to quit the function.

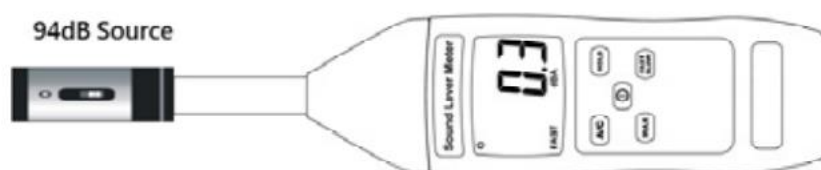
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Data hold

- Click HOLD to enable or disable the data hold function. When "HOLD" is activated, all buttons will be disabled, except for (I).

Calibration (94dB)

- Carefully plug the microphone head into the 1/2 inch hole of the standard audio source (94dB, @1KHz sine wave).



- Turn on the power of the standard audio source (94dB, @1KHz sine wave).
 - Press and hold "A/C" + HOLD for more than 1 second and enter the 94dB correction function.
 - Press "MAX" for auto calibration.
 - Press "A/C" to select frequency weighting.
 - Use the "HOLD" / "FAST/SLOW" buttons to manually adjust the deviation value (± 3.5 dB).
 - Press (I) to quit the 94dB correction function.
- * Auto correction range is 90.5~97.5dB.
- * The meter has been calibrated as ex-factory. The calibration period is recommended as 1 year.

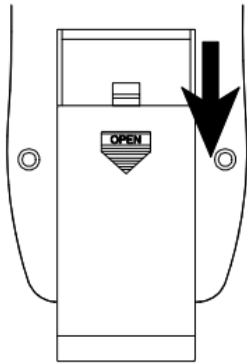
Maintenance

- When the battery symbol is displayed on the LCD, it means that there is insufficient power; Change the battery immediately in order to ensure its accuracy.
- Do not place the meter in locations that have high temperature, humidity, or with exposure to direct sunlight.
- Remember to turn off the power after usage; Remove the battery if not used for a long period of time in order to prevent battery leakage and damage to internal components.
- If the instrument fails to function, repair must be done by the authorized service provider

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Battery replacement

- Turn off the power.
- Open the battery cover at the back of the meter to remove the batteries.
- Insert the new 9V batteries according to the polarities.
- Put the battery cover back in place.



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Version control

Ver.No.	Page(s)	Section(s)	Amendment detail	Amended by	Date
1	n/a	n/a	Original document	n/a	22.05.2023
2	All	All	Document fully reviewed and revised to take into consideration the recommendations from NRW as part of their Environmental Permit IC6 review	Neil Shawcross	09.02.2024
3	All	All	Document fully reviewed and revised to take into consideration the recommendations from NRW as part of their Environmental Permit IC6 review	Neil Shawcross	08.08.2024
4	7 13 19 20 21 25	4.1 5.2 App 2 App 6	Document revised to take into consideration the recommendations from NRW as part of their ongoing Environmental Permit IC6 review	Jonathan Wirth / Neil Shawcross	13.11.2024
5	27	App 7	Creation of App 7 to satisfy NRW request for a procedure that documents the noise monitoring procedure for the site in relation to routine monitoring.	Neil Shawcross	29.01.2025

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