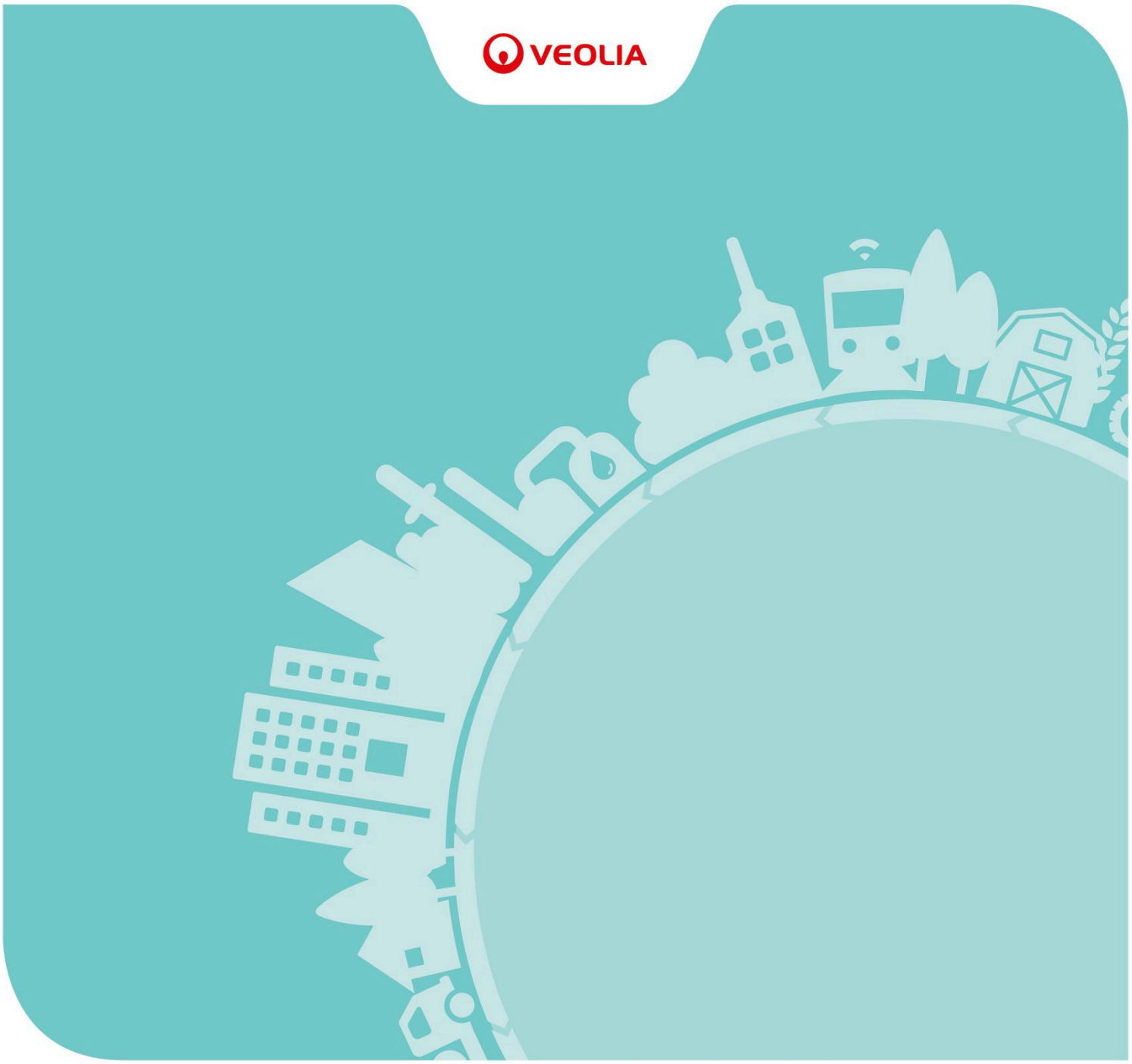


Noise Management Plan

Shropshire IVC

Fenn's Bank, Whitchurch, SY13 3PA (NGR: SJ 50631 39117)
Permit Reference: TBC

Date: May 2025
Version: 1

Document Control

Version	Revision date	Reason for revision	Version
V1	May 2025	Permit application	V1

Accompanying Noise Impact Assessment:

- Noise Impact Assessment For In-Vessel Composting (IVC) Facility at Former Befesa Salt Slags Site, Fenns Bank, Near Whitchurch, For Veolia ES (UK) Ltd, Report No.: R25.0506/DRK, Date: 27 th May 20

Contents

1. Introduction

1.1. Site description

Shropshire IVC 'the IVC facility' will be operated by Veolia ES Shropshire Limited 'Veolia' and will accept 50,000 tonnes per year of primarily municipal green and food waste. The facility is located in Fenn's Bank which is just under 3km south west of Whitchurch and just under 13km south east of Bangor-on-Dee. The input green and food waste will be recycled by the IVC facility to produce a BSI PAS100 compliant compost material which will be used for agricultural or horticultural soil conditioning or improvement.

The site layout will comprise an existing repurposed main building of approximately 95m by 52m and around 11m high which is divided into two roughly equally sized compartments comprising input storage and shredding in one area and the IVC tunnels in the other. Waste inputs will arrive by road vehicle and from initial storage in an enclosed waste reception building will be passed through a low speed shredder to produce a uniform size to prepare the material for the composting process. From there it will be loaded into one of seven concrete tunnels situated within the main building where sanitisation will take place. Once the material is sanitised it is transferred from the tunnels to an external pad where stabilisation stage takes place. The stabilisation / maturation pad has a forced air system supplying the oxygen required for the remainder of the composting process to the windrows via a network of pipes and spigots. A tech room housing the fans used to supply the ait will be situated adjacent to the pad.

Air will be extracted from within the building and from the IVC tunnels by a series of fans which will be ducted to a scrubber and a biofilter with air being released from a 20m stack.

Following stabilisation the material will be processed through a refining plant comprising a star screen, overband magnet, wind sifters and a trommel. The refining process will remove oversized woody material, plastics, metals and separate the compost into both agricultural and horticultural grades.

Veolia operates under an integrated management system that defines the business procedures, formulated to assist in meeting business objectives across the entire scope of Veolia's activities. The system is externally certified to ISO:14001 and therefore is subject to both internal and external audits to ensure compliance and to promote continual improvement. Veolia sites are certified as operating to Competence Management System - Energy & Utility Skills. The certification includes both in-vessel and open windrow composting sites.

1.2. Site setting and location

The following is a summary of the site setting highlighting key noise sensitive receptors within 1km, further information about receptors is provided in the amenity section and the associated drawings.

The facility is located off Fenn's Bank, Whitchurch, SY13 3PA centred on National Grid Reference SJ 50631 39117 and is in a predominantly rural setting. The site is within NRW's Gogledd Dwyran Cymru (North East Wales) operational area within the Wrecsam (Wrexham) unitary local authority.

The nearest residential receptor is approximately 185m to the east of the facility at Park Farm with further properties running south down the road to Maelor Terrace. Approximately 350m to the north east are residential properties at Annies Cottages. A small enclave of residential properties lies approximately 480m to the south east at the Pump House situated just over the border in England.

Approximately 120m to the south is a cluster of commercial properties including a Veterinary practice. To the west and south west are two farms, Conery Farm 680m to the south west and Woodlands Farm 460m west.

The Mereside industrial estate is located approximately 180m to the south comprising a small number of industrial premises with a total area of around 1.6ha.

The A495 (Long Lane) connecting Oswestry and Whitchurch runs south west to north east approximately 815m to the north west boundary of the facility, there are no other potentially impacted transport networks or related There are no other regulated waste or installation sites within 1km - the nearest is D J Huxley (Farms) Limited at Bank Farm approximately 2.7km to the northwest.

1.3. Operational profile

The site operations are typically 07:00 to 18:00 Mondays to Saturday, but are subject to opening Sunday morning for deliveries.

1.4. Responsibility for the Implementation of the Noise Management Plan

The implementation and dissemination of this ONMP will be the responsibility of the Site Manager, supported by other staff. The Site Manager can delegate certain tasks as required, although ultimate responsibility will remain with them. A nominated deputy will be appointed for all times when the Site Manager is not on site. In such circumstances, it will be the nominated deputy's responsibility to ensure that the requirements of the ONMP are adhered to. All site staff will receive instructions on how the management plan is to be implemented during toolbox talks on site. This document forms part of the Site's Environmental Management System (EMS) and will be reviewed on an annual basis to ensure that it is fit for purpose and meets the requirements of current guidance.

1.5. Maintenance and review of the NMP

Training, document access and key review intervals

Training / review aspect	Details
Post holder responsible for FPP related training	Site manager
Review interval criteria	Annually unless there have been no changes.
	Following an incident which resulted in actual or potential fire.
	A change to activities on site.
	Following instruction by National Resources Wales under the relevant condition of the environmental permit.
Training overview	The Veolia Management System 'VMS' includes a procedure that defines the process and responsibilities of personnel involved in the identification and evaluation of learning and development needs as well as the subsequent implementation of essential training to enable all employees to perform effectively and proficiently in their individual jobs. Site personnel are aware of the parts of the permit relevant to their role and a copy of the permit is available. A training matrix for all site personnel is in place and updated with all personnel trained according to the requirements of their role, including refreshers Monitoring is in place to demonstrate competency. Staff will be trained in the use of portable fire fighting equipment.
Training interval	Management will maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment.

1.6. Relevant sector guidance on which this NMP is based

Reference documents

Guidance title	Source	Publication date / date accessed
		11 January 2021
	https://www.gov.uk/guidance/develop-a-management-system-environmental-permit	August 2023 [accessed]

	s	
(BAT) conclusions for waste treatment, under Directive 2010/75/EU	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L_.2018.208.01.0038.01.ENG&toc=OJ%3AL%3A2018%3A208%3ATOC	August 2018
Appropriate Measures for permitted facilities.	https://www.gov.uk/guidance/chemical-waste-appropriate-measures-for-permitted-facilities	August 2023 [accessed]
Appropriate Measures for permitted facilities.	https://www.gov.uk/guidance/treating-metal-waste-in-shredders-appropriate-measures-for-permitted-facilities	August 2023 [accessed]
Appropriate Measures for permitted facilities.	https://www.gov.uk/guidance/waste-electrical-and-electronic-equipment-weee-appropriate-measures-for-permitted-facilities	August 2024 [accessed]

2. Receptors

Receptor list

Receptor reference	Land use e.g. house, school, hospital, commercial	Direction from site (north, south, east, west)	Approximate distance to site boundary (m)
R1 (Park Farm Cottages)	Residential	East	190
R2 (Fenn's Bank Lane)	Residential	East	220
R3 (Fenn's Bank Lane)	Residential	East	240
R4 (Residence nr Mereside Ind.Est.)	Residential	East	308
R5 (The Conery, Conery Lane)	Residential	West	680
R6 (Woodlands Farm, Conery Lane)	Residential	North west	470
R7 (Conery Lane Farm, Conery)	Residential	North west	770
R8 (Pinfold Cottage, Long Lane)	Residential	North west	840
R9 (The View, Fenn's Bank Lane)	Residential	North	390

Receptor plan

3. Noise sources and processes

3.1. Noise impact assessment (NIA) conclusion

The results of baseline sound monitoring show that between 0800-1800 hours, the representative L_{A90} level is 30dB to 33dB. During the evening period, the established representative background sound level was 26dB to 28dB L_{A90}.

During night-time periods (between 2300 to 0700 hours) the representative background level was shown to be 26dB L_{A90}.

Typical site operating noise levels have been established from noise data obtained from Technology Providers or library empirical data for similar sites operating in the UK to provide input data for the noise model. Where appropriate plant design noise levels have been mitigated to ensure compliance with noise guidance and standards to protect amenity.

The predicted rating noise level contribution from the application site using ISO9613-2 methodology and CadnaA noise modelling software shows noise levels at NSR from the Site to range between 25dB and 34dB L A_{eq1hr} during maximum daytime site operations including vehicle and mobile plant movements.

During evening and night-time periods the predicted rating noise level would range between 10dB and 22dB L $A_{eq1hr/15mins}$. The results show that the noise contribution from maximum site rating noise levels (when allowing for a +3dB noise character penalty, which is not deemed to be required by the author this assessment) at NSR would be no higher than the established representative background sound level +4dB during daytime operating periods. According to BS4142: 2014+A1:2019 the resultant assessment would conclude that noise from the site would result in a low impact to below adverse impact.

During the evening and night-time operating periods, when the pre-treatment and processing activities have stopped, the highest likely rating noise level during evening and night-time periods (when allowing for a +3dB noise character penalty, which is not deemed to be required by the author this assessment) show no exceedance of representative background sound level and would result in a low impact according to BS4142:2014+A1:2019.

The predicted noise levels generated by the Proposed Development at NSR in terms of context with typical baseline residual sound levels would produce a negligible impact in terms of any increase (i.e. when comparing L Aeq's).

Maximum levels of vibration during the construction or operational phase (i.e. during the use of vibratory plant during construction) would result in a negligible impact.

The impact from additional vehicle movements on the local roads during construction or operational periods to and from Site during weekdays or Saturdays would result in a negligible impact and therefore not significant.

The assessment concludes that the site can be designed to operate such that it complies with all appropriate and relevant noise standards and guidance. There is, therefore, no reason to refuse the Proposed Development on the grounds of noise or vibration.

3.2. Noise sources

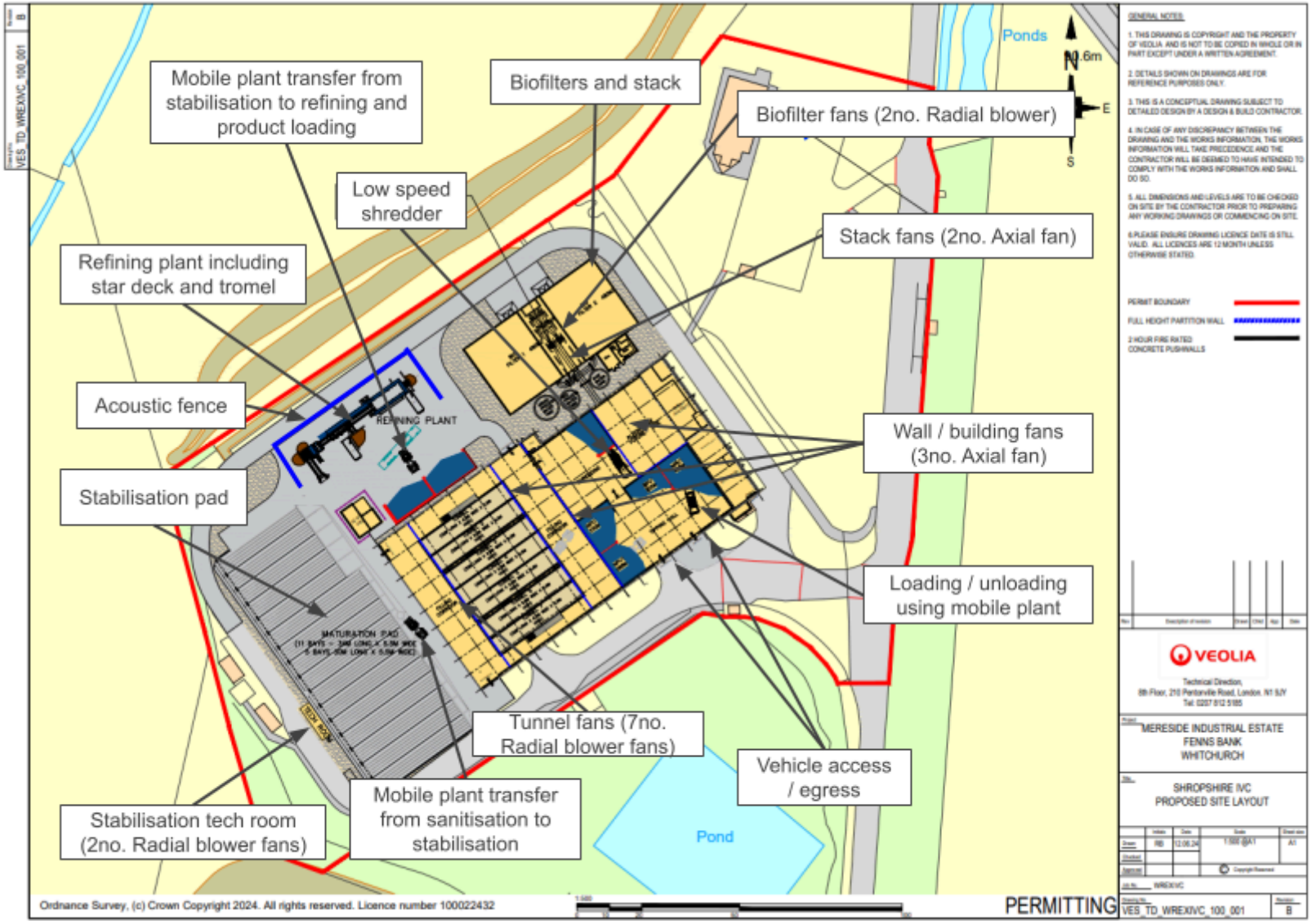
Noise source sound pressure / power levels are described below.

Plant Type	Sound Pressure Level (SPL) LAeq [dB]	Source Of Noise Data	Assumed % Operating Time	Example of mitigation	Period of Operation
Biofilter Stack	65 @ 1m/90deg	Design Limit	100	Design of fan stack silencer (design to limit, remove tonality & avoid stack resonance issues)	Daytime & Night-time
Biofilter Plantroom Building	75 (reverberant SPL in room)	Fan 1A (2 off) Fan 3 (2 off)	100	Fans acoustically treated. Design of Fan & Speed. Wall construction Rw 52dB, roof Rw 48dB.	Daytime
Biofilter Plantroom Building	70 (reverberant SPL in room)	Fan 1A (2 off) Fan 3 (2 off)	100	Fans acoustically treated Design of Fan & Speed Wall construction Rw 52dB roof 48dB.	Night-time
Biofilter Rooms 1 & 2	84 (reverberant SPL in room)	Each room: Fan 1A (1 off) Fan 3 (1 off)	100	Fans acoustically treated. Design of Fan & Speed. Wall construction Rw 52dB, roof Rw 48dB.	Daytime & Night-time
Maturation Pad Tech Room	69 (reverberant SPL in room)	Fan 5 (2 off)	100	Design of Fan & Speed Acoustic Cladding construction Rw 44dB	Daytime & Night-time
Pre-treatment	80-81 (rev. SPL in reception) 83 (rev. SPL in shredder area)	Mobile plant Shredder noise	100 100	Cladding treatment Rw 24dB. Fast Acting Doors Rw 10dB on SE facade	Daytime
Pre-treatment	60 (rev SPL in reception & shredder)	Fan 1B (1 off) & 2B (1 off)	100	Cladding treatment Rw 24dB. Fast acting doors Rw 10dB on SE facade	Night time
Composting Tunnel Building	80-81 (rev. SPL in room)	Mobile Plant	100	Cladding treatment Rw 24dB. Fast Acting Doors Rw 10dB on SW & NW façade. SE façade roller shutter door Rw18dB	Daytime
Composting Tunnel Building	60 (reverberant SPL in room)	Fan 2B in room (fans 2A & 4 in tunnels)	100	Design of fan & speed Cladding & doors as per daytime spec.	Night-time
Refiner Screener	85 – 87 @ 1m 82 – 84 @ 1m	Library Library	100 100	Design of plant Design of plant	Daytime Daytime
HGV	75 @ 10m	Library	Intermittent	No reversing into Reception Hall necessary	Daytime
Front Loader	73 @ 10m	Library	Intermittent	Non-tonal reversing alarm	Daytime

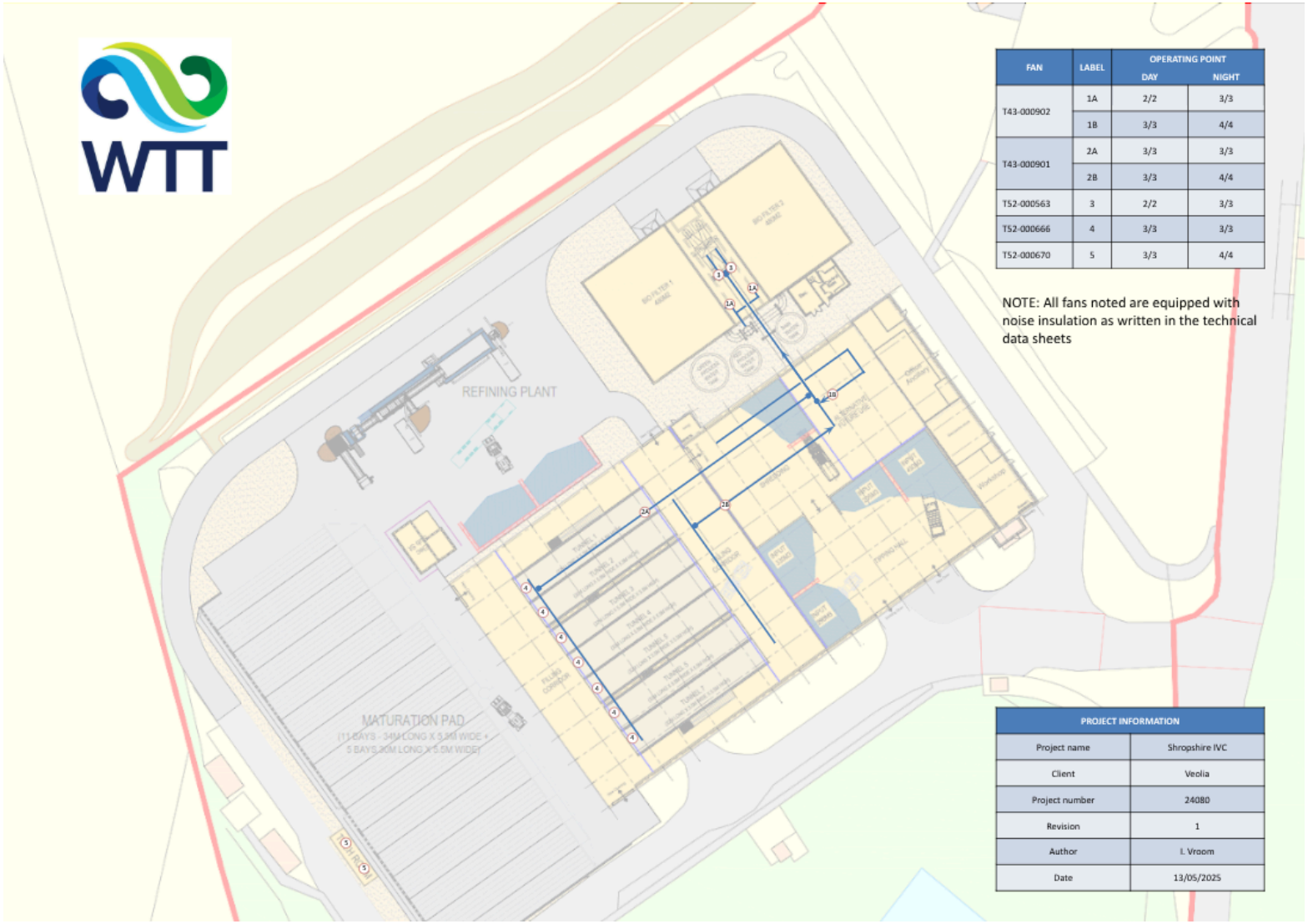
3.3. Overview of noise processes and emissions

Activity which produces noise	Operational Hours / days	Description
HGV movements	0700 - 1800 Mon-Sat (occasional deliveries outside this period)	HGV will bring green / food into the site and export finished PAS100 compliant product.
Mobile plant movements	0700 - 1800 Mon-Fri	Mobile plant movements comprising: ● Movement of material into storage bays ● Transfer of input material to the shredder ● Transfer of shredded material to the IVC tunnels ● Transfer of sanitised material from the tunnels to the stabilisation pad ● Transfer of stabilised material to the refining plant ● Transfer from the refining plant to product storage ● Loading of product for export
Shredding of inputs	0700 - 1700 Mon-Fri	Low speed shredder used for size reduction of input material for pre-conditioning prior to the sanitisation phase.
Fans	24/7	Fans used for air supply and air handling comprising: ● Tunnel fans (one on each IVC tunnel to modulate air supply to the material undergoing sanitisation). ● Wall / building fans within the reception and processing halls to maintain buildings under negative pressure and move air to abatement plant. ● Biofilter fans to distribute air into the biofilters. ● Stack fans to direct air through the 20m stack. ● Stabilisation fans in a tech room adjacent to the external pad apply air to the underside of the windrows during stabilisation.
Refining	0800 - 1800 Mon-Sat	The refining plant accepts stabilised material and which is treated through a star deck, trommel, wind sifter and overband magnet. The plant removed oversized material , plastic and metal and grades the compost by size fraction depending on the required product.
Diesel pumps for fire system	Emergency use only	These pumps will only operate if there is an emergency on site requiring deluge water and are not included in the noise assessment.

Site plan showing locations of noise emitting processes, with routes shown of mobile noise emitting sources



Site plan showing locations of noise emitting processes, with routes shown of mobile noise emitting sources (fan detail and ducting)



FAN	LABEL	OPERATING POINT	
		DAY	NIGHT
T43-000902	1A	2/2	3/3
	1B	3/3	4/4
T43-000901	2A	3/3	3/3
	2B	3/3	4/4
T52-000563	3	2/2	3/3
T52-000666	4	3/3	3/3
T52-000670	5	3/3	4/4

NOTE: All fans noted are equipped with noise insulation as written in the technical data sheets

PROJECT INFORMATION	
Project name	Shropshire IVC
Client	Veolia
Project number	24080
Revision	1
Author	L Vroom
Date	13/05/2025

4. Control measures and process monitoring

4.1. Appropriate measures / Best Available Techniques (BAT)

Actions and procedures which will be in place to achieve appropriate measures / best available techniques (BAT)

Activity which produces noise	Operational Hours / days	Control measures (Appropriate Measure / BAT)	Contribution to overall impact	Action taken if outside optimum process parameters
Maturation pad	0700 - 1800 Mon-Sat	• Retaining wall to be constructed around the maturation pad area to a height of 5m [not a noise mitigation feature but part of site design which contributes to noise control]	Low	• Not applicable - permanent site feature
HGV movements	0700 - 1800 Mon-Sat (occasional deliveries outside this period)	• One way system in place • Vehicles are not required to reverse into buildings	Low	• Investigate the reason for movement outside normal hours and review with the haulier.
Mobile plant movements	0700 - 1800 Mon-Fri	• Mobile plant and site-controlled vehicles fitted with non-tonal reversing alarms (i.e. broadband noise, `white noise' or SMART type reversing alarms) • PPM in place for mobile plant • Staff training to ensure waste is handled sympathetically • Regular toolbox sessions on standard procedures • Regular site walks by site managers checking on procedures • Fast acting doors on the southern and western facades of the Reception & Pre-Treatment Building to minimise door opening periods • Internal and external areas of the site are flat concrete construction, PPM in place for site surfacing • Mobile plant weekly checklist	Medium	• Review staff training • Review PPM schedule • Door failure (see fans)
Shredding of inputs	0700 - 1700 Mon-Fri	• Shredder is of a high torque low speed design • The shredder are situated inside a fully enclosed building • PPM in place for fixed plant • Fabric of the building is maintained in good condition • Trained staff using equipment • Fast acting doors on the southern and western facades of the Reception & Pre-Treatment Building to minimise door opening periods • Roller shutter doors are closed when the equipment is operating	Medium	• Hire alternative shredder • Door failure (see fans)

Activity which produces noise	Operational Hours / days	Control measures (Appropriate Measure / BAT)	Contribution to overall impact	Action taken if outside optimum process parameters
Fans	24/7	• Attenuated fan in accordance with noise report R25.0506/DRK, Date: 27th May 2025 • Operation of fans in daytime and reduced night-time mode [not a noise mitigation feature but part of site design which contributes to noise control] • PPM in place for fixed plant • The fan stack at the Biofilter building is fitted with an attenuator • Fans located in the Biofilter Plantroom (central section) to be enclosed to reduce the reverberant noise level inside the room • The Reception & Pre-treatment and Composting Tunnel Area within the main building would be fitted with a dividing wall formed from cladding or blockwork [not a noise mitigation feature but part of site design which contributes to noise control] • Maturation Pad Technical Room fitted with cladding to walls and roof • The fan stack at the Biofilter building fitted with an attenuator • Fast acting doors on the southern and western facades of the Reception & Pre-Treatment Building to minimise door opening periods • Clear and conspicuous signs will be pinned on all outside doors (inside and out). After entering or exiting the building, it will be the responsibility of all staff / visitors to ensure doors are closed behind themselves (inc. openings).	High	• Equipment failure: Review PPM schedule • Door failure: Nearest person to immediately close the doors either remotely or manually and inform the Competent Person. Competent Person to ensure doors are repaired as quickly as possible. Until repairs are completed, Competent Person to ensure doors remain open for the shortest time possible. The reason for failure will be investigated (in association with supplier / contractor if required) and maintenance plan revised if required. • Personnel door left open: Review staff training
Refining	0800 - 1800 Mon-Sat	• The refining plant is surrounded on three sides by an acoustic screen (formed by close-boarded fencing (15kg/m^2) or a solid wall) to a height of 5m • Monthly inspection of the acoustic screen to ensure it is in good condition • PPM in place for fixed plant	High	• Cease operation and investigate reasons for elevated sound levels
Diesel pumps for fire system	Emergency use only	• PPM in place for fixed plant.	Low	• Investigate root case and ensure repair before next activation

4.2. Onsite monitoring procedures

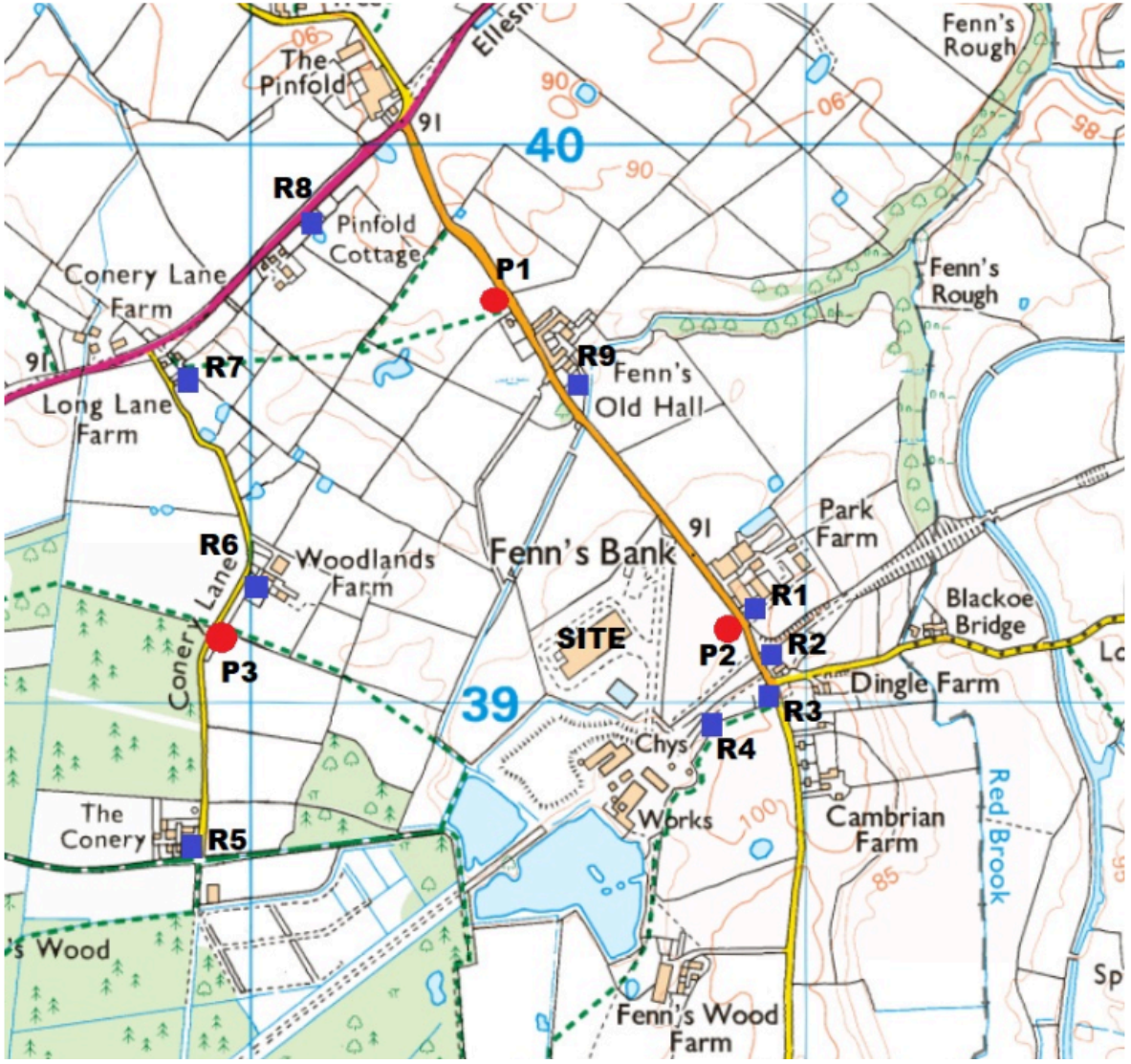
Description of onsite processes which will ensure impacts do not increase on site

Description of procedure	Procedure	When will this be carried out?	Corrective action
Replacing old / faulty equipment	Procurement of new equipment	When equipment requires replacing	• Replace equipment that have sound levels which are equivalent or lower sound levels compared to existing equipment
Checking noise barriers	Visual inspection of barriers to ensure no gaps or holes	Monthly	• Repair the barriers if holes or gaps are found
Check fabric of main building	Visual inspection of the building to ensure no gaps or holes	Monthly	• Repair the building if holes or gaps are found
Check for abnormal operation of fans	Identify and report any fans producing more noise than expected	Daily	• Report via maintenance contract and schedule repair • If severe (perceptible off site) determine whether unit can be taken out of operation temporarily
Planned preventative maintenance 'PPM'	Site has a PPM schedule for all fixed and mobile plant using a combination of HxGN EAM (computerised maintenance tracking), spreadsheet based management and check sheets	In accordance with 'PPM' schedule	• Any PPM failures are reviewed with the site manager and the technology provider

4.3. Monitoring off site sound levels

Off site monitoring is not expected to be required as part of routine operation, however it is proposed to carry out some subjective checks after the equipment is commissioned using the same monitoring locations specified in the noise impact assessment (Ref No.: R24.0605/DRK Date: 25th June 2024).

Plan showing locations of sound level measurement positions used to monitor sound from the site



Measurement Location	Frequency of measurement	Minimum measurement duration	Measurement period	Operating conditions on site	Expected specific sound level
P1	Monthly	10 mins	Within operational hours (0700 – 1800)	Normal operation including refining	Site activity should not be perceptible above ambient noise levels, there should be no perceptible noise characteristics (e.g. bangs, hums / tonal noise from fans, intermittent noise
P2	Monthly	10 mins	Within operational hours (0700 – 1800)	Normal operation including refining	
P3	Monthly	10 mins	Within operational hours (0700 – 1800)	Normal operation including refining	

5. Complaints reporting

All feedback including complaints and non-conformances are recorded and reviewed with corrective and preventive actions put in place in accordance with Complaints and Non-Conformance Reporting procedures.

The management of complaints is controlled by the Veolia Management System 'VMS'. Managers shall ensure that all complaints have been investigated, adequately handled and that any measures necessary to prevent a recurrence have been put in place.

Complaint recording

The recommended minimum level of detail that needs to be collected when a noise potentially linked to on site activities is reported is as follows:

- the time and date when the noise was observed;
- the location (within approx. 100 m) where the noise was observed, e.g. postal address, grid reference)
- the sensitivity of the location;
- a description of the noise including all factors necessary to make an assessment of the impact, including intensity, intermittency, acoustic features such as bangs / tones, frequency and duration;
- the identity and address of the reporter, if provided / consented, in order to understand the spread of complaints and the number of individuals impacted;
- any other information the reporter can offer which may help with the investigation.

It is also necessary to collect (by observation or further investigation) the following additional information to allow subsequent analysis and collation of complaints:

- The type of processes operating at the Facility during the the time period of the complaint.
- any process incidents at the time of complaint.

Complaints are recorded on the standard AVA complaint form. This should then be recorded on AVA as an attachment to the AVA complaint entry.

Investigation of Noise Complaints

The aim of the investigative actions will be to establish:

- the source of the noise complaint; and
- the impact of the noise
- appropriate measures / actions required to prevent pollution if required

Complaint screening

The object of the initial screening is to quickly identify those noise complaints that are unlikely to be due to the facility. Initial screening should consider the following:

- knowledge of potential sources on the facility (timing of the report cross referenced with work activities in progress, any plant problems, etc);
- knowledge of other potential sources in the locality other than the facility;
- distance of the reporter from site; and

VES will liaise with local stakeholders (including the complainant) and inform them on the outcome of the screening assessment of the complaint and whether or not any action is to be taken.

Further investigation / substantiation

If the initial screening does not discount the facility as a potential source of the noise reported further investigation will be carried out using:

- on and off-site noise monitoring (initially subjective), quantitative if required
- a review of activities being carried out on site
- records about process conditions, observations or inspections at the time of report Note that on and off site noise monitoring is not appropriate where reports are made retrospectively but records can still be reviewed.

Where the noise is substantiated, VES will carry out a root cause analysis to identify the conditions which are leading to unacceptable noise emissions from the Facility and review containment and control measures as appropriate.

Multiple Complaints

Where multiple complaints are received during the same time period i.e. during a single working day. The site manager will instigate investigation on site including a review of all current operations taking place.

Reporting systems for the business are laid out in the following two documents -

- SYS/2/007 - Complaints and Non Conformance Reporting
- SYS/2/037 - Event Reporting and Notification

Community engagement

Communicating with Natural Resources Wales

In the event a report of noise is received from a member of the public the local Environment Agency officer / team will be informed by telephone or email and a ‘Notification of Abnormal Emissions’ form will be submitted if the report is substantiated.

Communicating with complainants

In the case of answerphone messages a return call will be made as soon as possible and within 48 hours. In the case of complaints submitted by email or by letter, a written response will be made within 15 working days of submission of the complaint for complaints made by members of the public, or 5 working days for complaints made by an MP or Councillor. In the case of further investigations, Veolia will communicate to the complainant the course of actions likely to be taken so as to ensure that there is transparency and also to establish at the outset clear targets and goals for determining the success of any control measures. The level of annoyance associated with noise can often be reduced if affected individuals are provided with information about what they are smelling, the process that generates the noise, any factors affecting dispersion, what health impacts might be associated with the noise, what efforts are being undertaken to control noise and what is being done in response to their complaint. These actions can help affected individuals to moderate their own emotions of powerlessness and fear which may be exacerbated by noise. Liaison with the local community, offering credible reassurance and taking complaints seriously are often effective means of mitigating noise nuisance. To put this into practice, Veolia will aim to communicate the following message:

- The reason for the noise;
- The likely duration of the noise
- What plan is in place to end the noise episode
- What preventative plan will be implemented to prevent a re-occurrence
- What grievance procedure the aggrieved party can take

- Who is the responsible person on site to contact

Members of the public are able to contact VES directly with any noise complaints about the Facility. Methods of contacting VES will be displayed at the site, shown on the company website and communicated through meetings, press releases, bulletins and other forms of advertisement in connection with the operation of the Facility. Monthly site reviews are in place reviewing all aspects of site performance including performance against objectives, site improvement plan, customer feedback (Customer Feedback Procedure) and site actions. Quarterly reviews with General Managers are in place. Reviews include objectives, customer feedback, site improvement plan, review of actions and performance (Management Review).