

Development Application No.DA0273/2014 (Farm 1)

Subject Land: Lots 90 and 117 DP 752204, Lots 1 and 2 DP 1078254 and part Lot 1 DP 377811, "Strathfield", Crow Mountain Road, Namoi River.

Description: Construction of a poultry broiler farm (Farm 1) containing 14 sheds, with 42,000 birds per shed and a maximum of 588,000 birds and associated infrastructure.

General

- 1) The development must be carried out generally in accordance with the Development Application, the Environmental Impact Statement prepared by PSA Consulting Pty Ltd, any plans approved by the Land and Environment Court in proceedings number 10605/2014, or as amended by conditions of this consent. If there is any inconsistency between these documents, the most recent document shall prevail to the extent of the inconsistency.
- 2) Dust control measures are to be in place and are to be undertaken for the duration of the construction works to prevent dust from affecting the amenity of the immediate area during construction. The applicant is to ensure dust control measures are maintained for the duration of the construction works and is to inspect the control measures for this purpose at frequent intervals. Any deficiencies in the dust control measures are to be immediately made good.
- 3) All wheel wash facilities shall be designed, installed and maintained with bunding and contained so as to prevent any spillage, seepage, or contamination of surrounding soils. Any wastewater accumulated within the bunding that does not evaporate is to be periodically pumped out and sent to trade waste.
- 4) All building works shall be constructed in accordance with safe work practices and complying with the relevant Australian Standards, Codes of Practice and the National Construction Code (NCC).
- 5) A copy of the approved and certified plans, specifications and documents incorporating conditions of approval shall be kept on the Subject Land at all times and shall be readily available for perusal.
- 6) All building work must be carried out in accordance with the provisions of the National Construction Code (NCC).
- 7) All building work must be carried out in accordance with the provisions of the disability (Access to Premises – Buildings) Standards 2010.
- 8) Construction work on the project shall be limited to the following hours to prevent unreasonable disturbance to the amenity of the area:

Monday to Friday – 7:00am to 7:00pm;
Saturday – 7:00am to 5:00pm; and

No work to be carried out on Sunday or Public Holidays if it is audible on other residential premises.

The applicant shall be responsible to instruct and control any sub-contractors regarding the hours of work.

- 9) To ensure safety, all demolition work shall be carried out in accordance with Workcover Authority requirements and Australian Standard 2601 – The Demolition of Structures.
- 10) To protect the amenity of the surrounding neighbourhood from the emission of light, any lighting on the Subject Land shall be designed so as not to cause nuisance to other residences in the area or to motorists on nearby roads and to ensure no adverse impact on the amenity of the surrounding area by light overspill. All lighting shall comply with Australian Standard AS4282.
- 11) The proposed building, site works or property improvement approved by each Construction Certificate shall be completed prior to occupation or use to ensure compliance with the provisions of the *Environmental Planning and Assessment Act 1979*.
- 12) Pursuant to Section 97A of the *Environmental Planning and Assessment Regulation 2000*, a BASIX Certificate is to be submitted for the proposed dwellings.
- 13) Stormwater Quality and flows:
Except to the extent modified by the Soil and Water Management Plan or the Joint Statement of Water/Engineering Experts filed on 28 October 2015 in proceedings number 10605/2014:
 - overland flows up to 1 in 100 ARI events upslope will be diverted around areas of disturbance;
 - clearing of ground covers to be limited to construction areas only;
 - disturbed areas will be promptly rehabilitated and revegetated to stabilise with grass species consistent with surrounding landscape;
 - each of the poultry sheds will be constructed on an individual level concrete slab with a block work bund wall on each side, and 100mm bund outside each shed entrance point, to ensure no interaction with external water movement (roof water and stormwater);
 - shed roof will be constructed with sufficient overhang to ensure roof water is separated from the internal bird accommodation areas;
 - shed roof guttering systems are to be designed for 1 in 20 ARI events;
 - developed flows from sheds and hardstand areas shall be captured and controlled onsite for 1 in 1 to 1 in 100 ARI events. Where possible, discharge is to be directed to natural flow paths;
 - wash down water from the internal areas of the sheds are not to discharge from the sheds;
 - stormwater runoff around the sheds is to be collected within grass swales running lengthwise along each of the building pads:
 - drain inlets are to be provided at intervals to collect stormwater within a stormwater pipe and direct the water to the detention/bio-retention basin as detailed in the Joint Report Plans. The pipes will be designed for a 1 in 5 ARI event; -
 - stormwater discharge points will be constructed of loose packed rock to slow velocities, disperse water, and minimise the risk of erosion at the outlet;

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- detention/bio-retention basin to be constructed in accordance with the details in the Joint Statement of Water/Engineering Experts filed 28 October 2015 proceedings number 10605/2014; and
- where access roads cross natural flow paths, adequate drainage structure shall be constructed under the road or at the road finished level to allow the unobstructed movement of water along the flow path. Under road culvert structures must be designed for a 1 in 20 ARI event, and existing culverts within the public road reserves on the Subject Property upgraded to appropriate standard for a 1 in 20 ARI event.

13A) Groundwater:

Productions bores are to be designed and located in accordance with relevant NSW Office of Water Guidelines, to ensure as far as is reasonably practicable that they are deep enough to prevent abstraction from surface water drainage systems, alluvial aquifers or any groundwater dependant ecosystems.

13B) Surface Water Extraction

Satellite based telemetry is to be installed at the relevant surface water extraction point to assist the NSW Office of Water in monitoring compliance with relevant surface Water Access Licenses.

14) Flooding:

- (i) The finished floor level of the building shall not be lower than the 1 in 100 year ARI overland flow level plus 0.5m (taking account of the detailed site survey and 2D flood modelling and any amended plans under condition 26A). This level shall be determined by a suitably qualified stormwater engineer and submitted to Council for review prior to the issue of a Construction Certificate.
- (ii) An appropriate management plan is to be developed by the applicant to ensure adequate feed, water and avian health care are available during a 1 in 100 year event.

15) The following items including signage, tree removal for improved sight distance and guardrail construction, as identified in Table 26 of the Environmental Impact Statement prepared by PSA Consulting Pty Ltd, with amendment of the haulage route now being via Barraba Street, in lieu of Charles/Arthur Streets, shall be completed prior to commencement of operation of any poultry sheds:

- (i) widening at Barraba Street/Arthur Street/Namoi River Road intersection to allow for a legal swept path movement of a Restricted Access Vehicle and to allow two heavy vehicles to pass each other;
- (ii) school bus stopping area and drop off zone at the Crow Mountain Road/Namoi River Road intersection as described in Appendix D of the Traffic Impact Assessment;
- (iii) tree removal at chainage 4.82km along Namoi River Road to improve sight distance;
- (iv) installation of guard rail at the culverts at chainages 7.53km and 10.30km along Namoi River Road;
- (v) lighting and signage required at Crow Mountain Road/Namoi River Road intersection;
- (vi) remove or replace the existing cattle grids on all roads within the "Strathfield" property (the "Strathfield" Property is identified in Figure one on page two of the Revised Traffic Impact Assessment dated 17 April

2014, PSA Reference 0238). If the grids are replaced, they shall be four metres minimum width with fixed wing walls and reflectors on both sides of the grid and both approaches to the grid. The grids will be installed so that the top of the grid is flush with the road surface, and a "Give Way" sign will be installed on one of the approaches to the grid. On the side of the grid where the "Give Way" sign is installed, a pull off area shall be constructed to allow a B-Double to yield to oncoming heavy vehicles. Cattle grid approach warning signs shall be installed on both approaches to all grids; and

(vii) undertake and submit to Council for approval an engineering assessment of the structural capacity and width (for road safety purposes) of the culvert on Crow Mountain Road (100m south of intersection with Byrnes Gap Road). If the assessment identifies there are deficiencies with the capacity or width of the culvert, then it shall be replaced. If the assessment identifies there are no deficiencies with the capacity or width of the culvert, then no work is required.

15A) Immediately prior to tree removal in accordance with condition 15(iii) above, a suitably qualified ecologist is to inspect tree hollows to check for the presence of native fauna. If native fauna is present:

- (i) native fauna is to be relocated to avoid or reduce mortality during tree clearing; and
- (ii) to the extent that hollow limbs and/or tree hollows are to be removed, additional nest boxes are to be established.

16) Prior to commencement of construction, the developer shall develop a Transport Management Plan that includes a Heavy Vehicle Operator Code of Conduct that shall be signed and adhered to by all heavy vehicle operators servicing the Subject Land. The Transport Management Plan is to be co-ordinated amongst, and apply to Farms 1, 2, 3, 4 and 5 in "Strathfield". A copy of the Transport Management Plan shall be supplied to Council for review and approval prior to implementation. This Transport Management Plan shall make provision for requirements that:

- the operators of heavy vehicles will only travel on the nominated haulage route;
- no more than 48 B-Double truck movements will be permitted for the transportation of live birds to and from all five farms at "Strathfield" between 10pm and 7am;
- B-Double trucks transporting live birds between 10pm and 7am will travel at or below 60km/h along Namoi River Road between the cemetery and Arthur Street, and at or below 20km/h along Barraba Street between Arthur Street and Fossickers Way;
- limit the use of air brakes in urban areas and along the haulage route from "Strathfield" to the southern end of the township of Manilla;
- a phone number or email address to be provided for members of the public to lodge complaints in relation to heavy vehicles; and
- a complaints register to be maintained of all such complaints made, and actions taken as a result of the complaints, to be provided to the Council quarterly.

The Transport Management Plan may only be amended with the written consent of the Council.

16A) Acoustic treatment of individual dwellings:

In respect of the following residential premises located along the haulage route, prior to commencement of operations, the applicant shall offer to procure at its own cost the installation of a fresh air ventilation system that meets the Building Code of Australia requirements with the windows and doors shut, for each bedroom existing as at the date of the granting of this development consent that relies for its ventilation on a bedroom window which faces the haulage route:

- (a) All properties on Namoi River Road, Manilla, NSW, between the cemetery and the start of Arthur Street, Manilla, NSW, the front façade of which is located within 70 metres of the haulage route;
- (b) All properties on Barraba Street, Manilla, NSW, between Namoi River Road, Manilla, NSW and Fossickers Way (SR63), the front façade of which is located within 70 metres of the haulage route.

In respect of each such offer that is accepted within 30 days of being made, the applicant must procure the installation of the said fresh air ventilation system prior to the commencement of operations of the broiler farm.

In respect of each such offer that is accepted after 30 days of being made, the applicant must procure the installation of the said fresh air ventilation system within 60 days of the acceptance of the offer.

- 17) Section 138 approval, in accordance with the Roads Act 1993, is required from Council for any work undertaken on a public road reserve.
- 18) In accordance with Section 80A(1) of the *Environmental Planning and Assessment Act 1979* and the Tamworth Regional Council Section 94A Development Contributions Plan 2013, a levy of 1% of the development cost, as determined by a Quantity Surveyors Detailed Cost Report, shall be paid to Council to cater for the increased demand for community infrastructure resulting from the development.

The monetary contribution shall be paid to Council prior to the release of the first Construction Certificate for any sheds.

The Tamworth Regional Council Section 94A Development Contributions Plan may be viewed at www.tamworth.nsw.gov.au or a copy may be inspected at Council's Administration Centre during normal business hours.

General Terms of Approval

- 19) The development shall be carried out in accordance with the General Terms of Approval issued by the NSW Environment Protection Authority, attached.
- 20) The development shall be carried out in accordance with the General Terms of Approval issued by the NSW Office of Water, attached.
- 20a) Pursuant to Section 91A(3) of the *Environmental Planning Assessment Act 1979*, in the case of any inconsistency between the General Terms of Approval

referred to in Conditions 19 and 20 and the other conditions of this consent, the General Terms of Approval shall prevail.

Prior to Work Commencing

- 21) Pursuant to s.81A of the *Environmental Planning Assessment Act 1979*, the following matters must be satisfied prior to the commencement of work:
 - (i) obtain a construction certificate from either Tamworth Regional Council or an accredited certifier; and
 - (ii) appoint a Principal Certifying Authority (and advise Council of the appointment, if it is not the Council).
- 22) Erosion and sediment controls, in accordance with the Soil and Water Management Plan and any updated sediment and erosion control plan approved by Council for all construction works are to be installed and authorised before any site works begin, and be maintained effectively for the duration of the construction works.
- 23) A sign is to be erected in a prominent position on any work site on which work involved in the erection or demolition of a building is being carried out stating:
 - * unauthorised entry to the work site is prohibited;
 - * the name of the person in charge of the work site and a telephone number at which that person may be contacted outside working hours; and
 - * the name, address and phone number of the PCA.

The sign is to be removed when the work has been completed.

- 24) Toilet facilities are to be provided, prior to the commencement of work, at or in the vicinity of the work site on which work involved in the erection or demolition of a building is being carried out. Facilities are to be provided at the rate of one toilet for every 20 persons or part of 20 persons employed at the site.

Each toilet provided must be a standard flushing toilet, and must be connected to an accredited sewage management facility approved by the council. If connection to an accredited sewage management facility is not practicable, then connection to some other sewage management facility approved by the council is required.

The provision of toilet facilities in accordance with this clause must be completed before any work is commenced.

Prior to the issue of a Construction Certificate

- 25) Proposed Lot 1, as shown generally on the Preliminary Lot Configuration Plan prepared by PSA Consulting dated 25 June 2014, is to be registered with the NSW Land and Property Information Service prior to the issue of a Construction Certificate for the first shed(s).
- 26) Final location and engineering details of the on-site water storage dam, including dam liners to prevent seepage, and in accordance with the Soil and Water Management Plan and as amended by the Joint Report Plans and as necessary following the detailed site survey and 2D flood modelling are to be

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submitted to the NSW Office of Water for approval. Written confirmation of the approval of the design details is to be submitted to Council.

26A) Civil Works:

- a) Civil engineering plans and documents are to be submitted to Council for approval prior to the issue of a Construction Certificate.
- b) The civil engineering plans and documents are to be based on a detailed site survey and 2D flood modelling to inform any required changes to site earthworks and stormwater management infrastructure, and to incorporate the following requirements:
 - (i) The Farm (including sheds, loop road, water storage tanks and associated earthworks but not including the dam) is to be positioned a minimum of 10 metres from the top of the bank of any retained or relocated watercourse/constructed waterway;
 - (ii) All stormwater management infrastructure (including bio-retention basins, detention basins, relocated waterways, relocated diversion banks and erosion control requirements) as required; and
 - (iii) A dedicated sediment and erosion control plan based on the Soil and Water Management Plan and the final location of the Farm, ancillary infrastructure and dam.
- 27) Details of the proposed colour scheme for the external finishes of the farm sheds and associated infrastructure are to be submitted for the approval of Council prior to the release of a Construction Certificate.
- 28) Pursuant to Section 68, of the *Local Government Act*, an approval to operate a system of sewage management shall be obtained.

28A)

- a) A co-ordinated Environmental Management Plan applying to Farms 1, 2, 3, 4 and 5 in "Strathfield" is to be prepared and submitted to the Council by the applicant and approved by the Council prior to the release of a Construction Certificate.
- b) The Environmental Management Plan is to include the following components:
 - a Biodiversity Management Plan (which includes weed and pest management);
 - the Soil and Water Management Plan, the Joint Statement of Water/Engineering Experts filed 28 October 2015 and any civil engineering plans and documents prepared in accordance with condition 26A;
 - a Transport Management Plan including Heavy Vehicle Operator Code of Conduct;
 - the document entitled *Best Practice Management for Meat Chicken Production in New South Wales – Manual 2 (Meat Chicken Growing Management)*; and
 - an Operations Manual.
- c) The Environmental Management Plan is to have regard to:
 - these conditions of consent;
 - any environmental protection licence issued by the EPA; and

- any controlled activity approval issued by the NSW Office of Water.

28B) The applicant is to submit to the Council, prior to the issue of a Construction Certificate, details of a suitable arrangement in accordance with Attachment B of the Joint Statement of Water/Engineering Experts filed 28 October 2015 ensuring:

- the acquisition of any necessary easements benefitting the Subject Land for the purpose of extraction of surface water, including for the running of pipes and ancillary infrastructure across other land or under roads;
- reciprocal rights to exploit 1/5th of the groundwater and surface water available to the five farms in "Strathfield" under relevant Water Access Licences.

During Construction

- 29) Should evidence of contamination be discovered during construction works, all works are to cease until a Remediation Action Plan has been prepared by the applicant in consultation with Council.
- 30) The public way (outside of any construction works zone) must not be obstructed by any materials, vehicles, refuse, skips or the like, under any circumstances. Non-compliance with this requirement will result in the issue of a notice by the relevant Authority to stop all work on site.
- 31) Erosion and sediment control measures must be regularly inspected and maintained to avoid damage to and/or pollution of the environment during construction.
- 32) To comply with the statutory requirements of the *Protection of the Environment Operations Act 1997*, any contaminated material to be removed from the Subject Land shall be disposed of to an EPA licensed landfill.
- 33) If the work involved in the construction of the development is likely to cause vehicular traffic in a public place to be obstructed or rendered inconvenient, or involves the closure of a public place, approval from Council's Infrastructure Planning Division is required.
- 34) All allotment filling shall meet the requirements of AS3798 (as amended) – Guidelines on Earthworks for Commercial and Residential Developments.
Certification of the allotment filling shall be provided by a geotechnical testing authority registered under National Association of Testing Authorities (NATA). The testing authority shall be required to certify whether the fill complies with the requirements of AS2870.1 (as amended) – Residential Slabs and Footings – Construction, as "controlled fill".
- 35) Stockpiles of topsoil, sand, aggregates, spoil or other material shall be stored clear of any natural drainage path, constructed drainage systems, easement, water bodies, or road surface and located wholly within the Subject Land with measures in place to prevent erosion or movements of sediment in accordance with the approved erosion and sediment control management plan.

- 36) All spillage of materials, as a result of delivery or handling, must be removed as soon as practicable and placed into suitable receptacles for reclamation or disposal in a manner that does not cause pollution of the environment.
- 37) It is required that a Principal Certifying Authority (PCA) be appointed to undertake all critical stage inspections as prescribed under the *Environmental Planning and Assessment Regulations 2000*. The applicant may appoint either Tamworth Regional Council or an accredited certifier to be the PCA.

Prior to the issue of an Occupation Certificate

- 38) The section of Crow Mountain Road located within the Subject Land is to be gazetted as a Restricted Heavy Vehicle Access Route and any works required to facilitate this gazettal shall be the responsibility of the developer.
- 39) The landscaped areas of the development for screening purposes are to be provided prior to the issue of an Occupation Certificate for any sheds and then maintained at all times.
- 40) The occupation or use of the whole or any part of a new building must not commence unless an Occupation Certificate has been issued in relation to the building or part.
- 41) A minimum of 60 cubic metres (60,000L) of stored rainwater shall be provided for domestic purposes for each dwelling, unless the Subject Land is serviced by a Council water main. The draw off point for the water use for domestic purposes shall be located to allow a minimum of 10,000 litres of stored water for use in fire fighting, to remain in the tank/s at all times. Water storage tanks shall have fitted an outlet capable of being coupled to Fire Brigade fire fighting equipment. Fittings shall include the provision of a 65mm "Stortz" fitting with blanking cap (Stortz fittings may be obtained from a fire protection equipment supplier). The Stortz fitting draw off point shall be located at the base of the storage tanks (or connecting line). Reasonable vehicular access for fire tankers shall be available to the water supply. Guttering and downpipes shall be provided to convey roof water to the required rainwater tanks.
- 41A) An on-site effluent treatment and disposal system is to be installed for each dwelling according to the following specifications:
 - (i) The treatment system can consist of either primary or secondary treatment.
 - (ii) A minimum of 300m² of sub-surface irrigation area for each dwelling.
 - (iii) All effluent disposal fields are to be located at least 40m from any watercourse, at least 250m from any groundwater well, and outside areas affected by the 1 in 100 year flood event.

The farm staff amenities (office and shed) are also to have a minimum of 300m² of sub-surface irrigation.

- 42) The access points to the farms will have a pipe culvert with sloping headwalls installed. The culvert will be designed for a 1 in 5 ARI event and installed so that the invert of the culvert is at the same level as the invert of the table drain.

The culvert will be of sufficient width to allow the swept path movement of a B-Double from the adjacent public road (without pulling off the road onto the shoulder to allow the turning movement).

Continued Operations

43) Haulage Routes – “Strathfield” to Manilla.

Only the following roads are to be used as the haulage route from “Strathfield” to the Manilla township:

- Crow Mountain Road (within the Subject Land);
- Strathfield Road;
- Namoi River Road;
- Arthur Street (north of Barraba Street);
- Barraba Street;
- Manilla Street (Fossickers Way);
- Market Street; and
- Arthur Street (south of Market Street).

If in the future, a suitable alternate route through the Manilla township is identified and designated as a Restricted Access Vehicle Route for B-Double trucks, Council shall reserve the right to relocate the approved haulage route.

44) Haulage Routes – Manilla to Tamworth.

Only the following roads are to be used as the haulage route from Manilla to the Out Street Processing Plant (located at 1 Out Street, Tamworth) or the Oakburn Processing Plant (located at 1154 Oxley Highway, Tamworth) or the Oakburn Rendering Plant (located at 1154 Oxley Highway, Tamworth):

- Manilla Road (Fossickers Way) (South Manilla);
- Jewry Street, Tamworth;
- Ebsworth Street;
- Plain Street;
- Denison Street;
- Bridge Street; and
- Out Street (to the Out Street Processing Plant); or
- Gunnedah Road (to the Oakburn Processing Plant or the Oakburn Rendering Plant).

If in the future, a suitable alternate route is identified, and designated as a Restricted Access Vehicle Route for B-Double trucks, Council shall reserve the right to relocate the approved haulage route.

44B) Haulage Route - dead birds

Notwithstanding conditions 43 and 44, an alternative haulage route for the transportation of dead birds from "Strathfield" may be used if approved by the Council in writing.

45) Haulage Routes – In the Event of an Emergency.

Only in the event of an emergency, and access to the nominated haulage route is prevented, the following roads can be used as a haulage route:

Emergency Route A:

- Strathfield Road;
- Crow Mountain Road;
- Byrnes Gap Road;
- Buena Vista Road; and
- Manilla Street (Fossickers Way).

Emergency Route B:

- Strathfield Road;
- Crow Mountain Road;
- Namoi River Road;
- Arthur Street;
- Barraba Street; and
- Manilla Street (Fossickers Way).

- 46) At all times the Heavy Vehicle Operator Code of Conduct shall be adhered to.
- 47) Unless specifically directed or approved by the Council or the NSW Department of Primary Industries, the disposal of dead birds is only to occur by transport to the Oakburn Rendering Plant. Dead birds are to be collected from sheds on a daily basis and stored in on-site sealed chillers until collected and transported to the Oakburn Rendering Plant. Dead birds are not to be buried on the Subject Land or any other property.
- 48) At the end of each farming cycle, spent litter is to be collected from the sheds and loaded directly into trucks for removal from the Subject Land. No spent litter is to be stored, stockpiled, spread or processed on the Subject Land.
- 49) Spent litter is to be transported from the Subject Land as a securely covered load to minimise emissions of odour and particulate matter into the surrounding environment. Trucks hauling waste and spent litter are required to be either enclosed or securely covered.
- 50) All live birds collected from the Subject Land must be delivered to the Out Street Processing Plant, or once the approved Oakburn Processing Plant becomes operational, the Oakburn Processing Plant (but not to the Out Street Processing Plant and Oakburn Processing Plant at the same time), except in case of emergency in which case live birds may be delivered to another suitable processing plant.
- 51) To mitigate any potential risks associated with contact with wild waterfowl, the applicant must implement the following procedures:
 - a) Effective sanitisation of all drinking and cooling water that is obtained from surface water sources in accordance with the *National Water Biosecurity Manual - Poultry Production* or equivalent;
 - b) Maintenance of grass and vegetation around the perimeter of the sheds;
 - c) Use of foot baths or the use of shed boots at the entrance to each shed;
 - d) Maintain biosecurity practices in relation to the movement of people onto and from the Subject Land and entry into sheds in accordance with the *National Farm Biosecurity Manual for Chicken Growers* or equivalent;

- e) The use of waterfowl aversion techniques such as anti-alighting reflective tape on dams; and
- f) The inclusion of Bromide Ease Dose capsules®, or a substance which achieves the same effect, in the cooling pad water.

Advisory Notes

Note 1)

The applicant is to obtain any required Aboriginal Heritage Impact Permit or other required approvals from the NSW Office of Environment and Heritage.

Note 2)

Council accepts the applicant's undertaking to include into the Good Neighbour Policy or Environmental Operations Manual provisions that avoid the scheduling of operational and construction heavy vehicle movements between 7:00am and 9:00am and 3:00pm and 5:00pm on school days unless exceptional circumstances exist, in which case a speed restriction of 50km/h should apply to reduce potential conflict between heavy vehicles, school buses and related school traffic.