

7/07/2026

Ref: 26037

City of Swan  
2 Midland Square  
Midland WA 6056

Dear Sir Madam,

**Supplementary Information for DA-869/2026 - Proposed Private Recreation (Traditional Bhutanese Archery Range) - 355 Warbrook Road, Bullsbrook**

Statewest Planning has been engaged by the proponents, who have entered into a commercial lease agreement with the landowners over a portion of the subject site, to assist in the preparation and coordination of this Development Application. The application has been prepared in response to the preliminary planning advice provided by the City of Swan in relation to Planning Enquiry Reference PA1-1253/2026 and relates to DA-869/2026

Following discussions with the City's Planning Officers, the proposal has been refined to address the matters raised in the City's correspondence. In particular, the proponents have elected to significantly reduce the scope of the proposal by limiting this application to Stage 1 only. Any future tourism-related components, including camping, traditional Bhutanese hot stone baths and other ancillary activities, are expressly excluded from this application and, if pursued, will be the subject of separate development applications.

Accordingly, this application seeks development approval solely for the establishment of a Private Traditional Bhutanese Archery Range, together with the ancillary buildings, structures and works necessary to safely facilitate and operate that use.

**Proposal**

The proposal comprises a modest, low-intensity recreational facility promoting the traditional Bhutanese sport of archery within a rural setting.

The development generally includes:

- a 150-metre traditional Bhutanese archery range;
- a dome-style visitor shelter incorporating dining and gathering space;
- toilet facilities;
- an equipment storage area;
- safety walls adjacent to the target area;

- internal access and informal parking;
- minor earthworks to establish a safe and level playing surface (~200mm); and
- associated signage and safety infrastructure.

Note: No camping, tourist accommodation, hot stone baths or other tourism uses form part of this application.

### **Land Use Compatibility**

The subject site is zoned General Rural under the City's Local Planning Scheme, with the proposed use falling within the land use classification of 'Recreation – Private', a discretionary ("D") land use.

The proposal is consistent with the intent of this land use classification, as it provides a privately operated outdoor recreational facility for organised sporting and cultural activities, rather than a public recreation reserve or high-intensity commercial entertainment venue. The proposed traditional Bhutanese archery range is a purpose-built recreational facility that enables participants to undertake organised archery activities in a safe and controlled environment and therefore appropriately falls within the definition of *Recreation – Private*.

The discretionary nature of the land use recognises that the suitability of private recreational facilities is dependent upon the characteristics of the site and the potential impacts on the surrounding locality. In this instance, it is considered that the proposal represents an appropriate exercise of the City's discretion for the following reasons:

- the use is inherently low intensity, with activities conducted primarily in the open air;
- visitor numbers are modest and managed through a pre-booking system, limiting the scale and frequency of activity;
- the proposal generates relatively low traffic volumes and provides adequate on-site parking;
- operating hours are restricted to daytime hours (9:00 am to 6:00 pm), avoiding impacts associated with evening or late-night activities;
- the development does not involve amplified music, entertainment, industrial processes, significant lighting, dust, smoke, odour or other emissions that would adversely affect surrounding landowners;
- the built form is limited to relatively small ancillary structures necessary to support the recreational use, ensuring the overall scale of development remains consistent with the rural character of the locality;
- the development is located within an existing cleared area and does not require the removal of native vegetation; and
- the proposal provides a unique cultural and sporting opportunity within the City, contributing to the diversity of recreational opportunities available to the community.

Having regard to the above, it is considered that the proposal is compatible with the objectives of the General Rural zone. The development will maintain the rural character of the locality while introducing a low-impact recreational use that can operate without giving rise to

unreasonable impacts on the surrounding road network, neighbouring landowners or the broader rural environment.

Accordingly, it is submitted that the proposal represents an appropriate and supportable 'Recreation – Private' land use within the General Rural zone and warrants favourable consideration by the City.

### **Operations**

The proposed archery range is intended to operate as a small-scale private recreational facility, offering traditional Bhutanese archery experiences through pre-booked sessions within a safe and supervised rural environment.

The facility will operate between 9:00 am and 6:00 pm, seven days a week, with demand expected to be greatest on weekends and public holidays.

Activities will generally be conducted by prior booking, with each session accommodating typically between 10 and 20 participants. Sessions are expected to run for approximately 2 to 3 hours, allowing sufficient time for participant registration, a safety induction, equipment familiarisation, archery activities and breaks.

Under normal operating conditions, the facility is expected to host up to two organised sessions per day, with a third session occurring only occasionally during periods of higher demand. Based on this operating model, anticipated attendance is expected to comprise:

- Weekdays: approximately 5–15 visitors per day; and
- Weekends and organised events: generally 30–50 visitors per day.

The facility will be managed by the applicant, with assistance from family members or casual staff during busier periods or organised group bookings. It is anticipated that one to three staff members will be present on site at any one time, depending on booking numbers.

The proposed use is not intended to operate as a high-intensity commercial recreation or entertainment venue. Rather, it is designed to provide a low-impact cultural and recreational experience centred on traditional Bhutanese archery. Activities will primarily comprise supervised archery practice, coaching, cultural demonstrations and organised group sessions.

No amplified music, late-night activities or other high-impact recreational uses are proposed. The proposed operational model will ensure visitor numbers remain manageable, activities are appropriately supervised, and traffic generation and amenity impacts on surrounding rural properties are minimised.

### **Traffic and Access**

The proposed development is expected to generate only a modest level of traffic and is unlikely to have any material impact on the surrounding road network.

The archery range will operate primarily on a pre-booked basis, with activities generally conducted in up to two organised sessions per day, each lasting approximately 2 to 3 hours. A third session may be held occasionally during periods of higher demand.

Typical sessions are expected to accommodate 10 to 20 participants. Given the nature of the activity, it is anticipated that many visitors will attend as couples, families or organised groups, resulting in multiple participants arriving in the same vehicle. On this basis, a typical session of 10–20 participants is expected to generate approximately 5 to 10 visitor vehicles, together with one or two staff vehicles.

Even during busier weekend periods, when total attendance may reach approximately 30–50 visitors over the course of the day, arrivals and departures will be staggered between sessions rather than occurring simultaneously. It is anticipated that this level of activity would typically generate between 15 and 25 visitor vehicles across an entire day, which is considered modest for a recreational use within a rural setting.

The proposed use does not involve continuous patron turnover, retail trade or activities that would generate frequent vehicle movements throughout the day. Instead, traffic will generally be concentrated around the commencement and conclusion of each booked session, with relatively little vehicle movement occurring while activities are underway.

Adequate on-site parking will be provided within the development area to accommodate staff and visitors, ensuring all vehicles can be contained on-site without reliance on the surrounding road reserve.

Having regard to the anticipated visitor numbers, the booking-based operating model and the relatively low frequency of vehicle movements, the proposal is not expected to adversely affect the safety or efficiency of the surrounding road network, nor is it expected to give rise to unreasonable traffic or parking impacts on adjoining properties.

### **Amenity**

the proposal has been deliberately designed as a modest, low-scale recreational facility that responds appropriately to its rural setting.

The principal-built form comprises a small dome shelter and ancillary facilities, which are located well within the subject property and are separated from the nearest existing dwelling by approximately 200 metres (east). This separation distance, together with the expansive nature of the surrounding rural landholdings, provides a substantial physical buffer between the proposed use and neighbouring residences.

The proposed structures will also benefit from natural and established screening provided by existing agricultural buildings and vegetation within and surrounding the site. Consequently, views of the development from adjoining properties and the surrounding road network will be limited, ensuring the visual presence of the development remains subdued within the broader rural landscape.

From a visual perspective, the scale and form of the proposed structures are considered entirely consistent with the character of the locality. Rural areas commonly accommodate a variety of agricultural and ancillary buildings, including sheds, workshops, storage structures, shelters and other functional outbuildings of varying sizes and designs. The proposed dome shelter and associated facilities are comparable in scale to many of these structures and will read as a small ancillary component of the broader rural property rather than a dominant built form.

Importantly, the proposal does not involve intensive urban-style development, extensive hardstand areas, large commercial buildings or expansive car parking areas that would be out of character within the General Rural zone. Instead, the built form has been intentionally limited to only those structures necessary to support the operation of the archery range.

In terms of operational amenity, the proposed use is also expected to have minimal impact on surrounding properties. Activities are confined to daylight hours between 9:00 am and 6:00 pm, with operation primarily by prior booking and generally limited to two organised sessions per day.

The proposal does not involve amplified music, public address systems, late-night trading, licensed premises, mechanical plant or other activities typically associated with elevated noise levels. Noise generated by participants will largely comprise normal conversation and the occasional release of arrows, both of which are inherently low-intensity and intermittent in nature.

Similarly, traffic generation will remain modest, with visitor arrivals concentrated around the commencement and conclusion of organised sessions. Given the relatively low patron numbers, the tendency for participants to arrive in shared vehicles and the provision of on-site parking, the proposal is not expected to create unreasonable traffic, parking or access impacts for neighbouring properties.

Overall, the proposal represents a low-intensity recreational land use that is appropriately scaled for its rural setting. Having regard to the generous separation distances, existing vegetation and built screening, modest built form, limited hours of operation and low traffic generation, it is considered that the development will not result in any unreasonable adverse impact on the amenity of adjoining landowners or the established rural character of the locality.

### **Environmental Considerations**

The proposed development is confined to an existing cleared area.

No native vegetation or mature trees are proposed to be removed, and only minor ground levelling (approx. 200mm to smooth out undulating areas) will be undertaken where necessary to provide a safe and even playing surface.

The proposal therefore maintains the existing landscape character while avoiding unnecessary environmental impacts.

### **Bushfire**

Based on the States bushfire prone mapping and preliminary discussions, the leased development area is not located within a bushfire prone area.

Accordingly, it is understood that a Bushfire Management Plan is not required for the proposed development area.

### **Servicing**

The development will incorporate appropriate visitor amenities, including toilet facilities serviced by an on-site effluent disposal system designed in accordance with the requirements of the relevant health and environmental requirements and conditions.

### **Archery Safety Management**

Although the proposal represents a relatively low-risk recreational activity, the applicants are committed to implementing industry best-practice safety measures to ensure the safe operation of the facility.

These measures include:

- operation under direct supervision by the proprietor or nominated range supervisor;
- use of designated shooting lanes with clearly defined shooting lines and target areas;
- installation of safety walls adjacent to the target area to assist in containing stray arrows;
- clearly identified exclusion zones beyond and adjacent to the targets to prevent public access during shooting activities;
- prominent safety signage advising participants and visitors of range rules and restricted areas;
- mandatory safety briefings for participants before shooting commences;
- controlled shooting conducted only on instruction from the supervising range operator;
- routine inspection and maintenance of targets, safety structures and range equipment;
- and
- operation on a pre-booked basis to enable participant numbers to be effectively managed and supervised.

These operational measures will ensure the facility is managed in accordance with accepted archery safety practices while providing a safe recreational environment for participants and visitors.

## **Conclusion**

The proposed development represents a modest, low-impact Private Recreation use that is considered appropriate within the General Rural zone. The application has been deliberately refined to ensure the scale and intensity of the development remains compatible with the rural character of the locality, while providing a unique cultural and recreational facility for the community.

As outlined throughout this report, the proposal has been designed to minimise potential impacts through its limited built form, low traffic generation, daytime operating hours, managed patron numbers, implementation of appropriate safety measures, and retention of existing vegetation. The development is appropriately setback from neighbouring dwellings, visually integrated within the site, and is not expected to adversely affect the amenity of surrounding landowners.

Having regard to the nature of the proposal, its consistency with the objectives of the General Rural zone, and its suitability as a discretionary 'Recreation – Private' land use, it is respectfully submitted that the application is capable of being supported.

We therefore commend the application to the City of Swan and respectfully request that development approval be granted, subject to any reasonable conditions the City considers appropriate.

Please contact the undersigned with any question regarding this application.

Yours faithfully

**ADAM OLIVARI**  
**Senior Planner**

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