

Submission 74 – Robert James



Infrastructure Planning Guidelines for Drone Delivery Services Public Consultation Draft

I am writing in response to the above paper.

I am in disbelief that the Federal government are considering such a scheme as this, it appears that some serious lobbying has been undertaken as I am unaware of any public demand for such services and the impact of noisy Drones that will effect peoples lifestyles & mental health.

Has any consideration been given to the impact on communities, and the dangers of Drone movement in the airspace above people.

I was astounded that the Federal minister for transport Catherine King announced recently that \$18m had been given to the industry to assist with its development.

It appears that the Federal Government have decided the operation of Drone deliveries is going to be forced on to communities before seeking approval from the Australian people and having strict guidelines and regulations in place beforehand.

Brisbane has experienced the deceit and underhanded processes that have allowed the (new parallel runway) NPR become operational, the community have been inundated with excessive noise far above what was stated in any of the AsA documentation and more flights on a 24/7 basis.

Now we are faced with Drones that don't even have any regulations or guidelines in place and without any public consultation. Apart from the commercial/corporate operators what are the benefits to the communities?, do the people of Brisbane want Drone deliveries?

Where is the review process for these operations? The community must be represented and be made part of the development and review processes.

Background

The drones and newly emerging [Advanced Air Mobility](#) (AAM) sector will create new jobs, industries and markets, and can connect our cities and regions with comparatively less capital investment than competing transport modes

- Subsequently there will be a loss of jobs as traditional transport modes fall into decline this is conveniently omitted from your statement as well as a reduced economic benefit from the same.

The sector is projected to deliver benefits to the Australian economy, including adding \$14.5 billion to Australia's Gross Domestic Product and creating and sustaining 10,000 jobs over the next 20 years. It is important that the sector continues to grow in a manner that is safe, secure and considerate of the community and the environment.

- Forecasting figures such as these are at best fanciful, the Australian community has been subject to many false forecasts of job creation and wealth and we are yet to see any of these eventuate. These figures are imaginary.

Safety

1. The Civil Aviation Safety Authority (CASA) regulates the safety aspects of civil aviation, including drone flights.
 2. CASA is responsible for regulating the safe operation of drones used for delivery services. This includes the aircraft, pilot licensing and operator certification.
- Unfortunately as Brisbane residents have experience with the second runway CASA & Airservices Australia (AsA) have lost their way and are no longer the credible agencies they once were. The corporate sector has got to them and instead of taking an unbiased assessment of a situation err on the corporate side

as they see imaginary jobs, increased share prices and wealth as a preference to what is right by communities.

- Nothing stated here mentions flight paths, who is responsible for developing these?
- As the use of Drones in built up areas/suburbs is a new industry, what assessments have CASA made with regards to safety, the drones will be carrying packages for delivery how have these been assessed as safe. Brisbane is notorious for windy conditions that arise without warning have CASA done an assessment on this? How could they if the industry is in development?

Noise

3. The Noise Regulations were amended in December 2021 to streamline drone noise management. As of 1 July 2022, most commercial drone operators are required to complete a [self-assessment form](#) as the first step to obtaining a noise approval. Drone delivery services will typically require a full assessment process to gain a noise approval.

- I am yet to see in any industry where self assessment has led to anything other than sub standard and unacceptable outcomes. To allow a developing industry to self assess noise management is pure negligence by the Federal Government. This cannot be allowed to happen to Drone deliveries, this is a developing industry and needs government regulation to keep it within acceptable parameters self assessment does not work in the real world where commercial interests are at stake.

4. The department considers a range of matters relating to noise impacts, including from the frequent take-off and landing of drones at infrastructure sites, as part of the operational approval process. Should you have any questions, please email dronenoise@infrastructure.gov.au.

- I would certainly assume you do consider a range of matters, surely you might explain what these are insert a document instead of asking people to email for answers?

5. In some limited circumstances, the regulation of drone noise may be the responsibility of a state government¹.

- Either the Federal Government are responsible or they are not the suggestion that State Governments may be responsible allows for buck passing and is not acceptable.

6. Local governments generally have responsibility for developing and implementing land use plans at the local level, with local plans expected to be consistent with regional plans and applicable state planning policies.

- I have no issue with this as long as guidelines and regulations are met but again involving another level of government leads to buck passing.

7. The department will consult with local governments as part of the noise approval process for drone delivery services to ensure community feedback is managed appropriately.

- As Brisbane residents experience with the second runway development community feedback and communication / consultation can be very poorly undertaken to the extent that the very people most affected by noise impacts are not informed. A dedicated communication team with a sufficient budget need to be established to ensure all communities are kept informed.

¹ State regulations may apply if a drone operator operates exclusively in Queensland or Victoria and is not a constitutional corporation. If you are unsure of the applicability of Commonwealth noise regulations on a drone delivery service, please contact the department.

- 8. The department will typically require drone operators to undertake noise measurement of their aircraft in operation as part of the noise approval process, unless existing measurements for the type of aircraft being used are available.**
- Self assessment does not work, commercial / corporate interests destroy any hope of it being successful, an independent acoustic analysis made must be used and on a monthly basis.
- 9. Commercial drone delivery aircraft for which measurements are available typically produce noise that is between 50dB and 70dB at a distance of 25-30m during take-off and landing.**
- Will this be ANEF average dB or a peak, maximum noise level must be taken as a peak dB and not averaged. The use of 25-30mtrs is ridiculous 1dB is lost for every metre of distance so at the source of the noise the Drone, the noise level could be 80 - 100dB. This is unacceptable
- 10. This noise profile is not substantially different from what is commonly experienced in commercial and light industrial areas, such as normal conversations (60db), loud conversation (70dB), kerbside heavy traffic (75dB) and construction vehicles (80dB)².**
- This is untrue, at the source of the noise where Drones land and take off the noise levels will be 80-100dB (refer item 9 above). So anyone within 30 mtrs of a landing or take off will experience in excess of your quoted figures.
- 11. Sound is reduced by about 6dB for each doubling of its distance from the source³. The generally accepted noise limit in Australia for residential areas during the day is between 40dB and 50dB.**
- 12. A range of factors can influence the noise impacts experienced in different locations, including local topography, cumulative noise impacts, and the effectiveness of drone noise abatement measures.**
- 13. It is not recommended that planning authorities require an independent noise measurement of drone operations where the planned infrastructure is within commercial or industrial areas.**
- I would insist on independent noise measurement of drone operations, surely you don't expect the commercial interests not to get in the way of responsible management of noise. Corporate Australia is well known to be expert in non reporting of deficiencies in their systems & operations.
- 14. If planning authorities are concerned about the potential noise impacts on nearby noise-sensitive receivers from drone operations associated with drone delivery infrastructure, it is recommended that they contact the department at dronenoise@infrastructure.gov.au.**
- Unless regulations with sufficient deterrents are introduced for non compliance what have planning authorities to complain about there are no guidelines.
 - Who takes ultimate responsibility for Drone operations it seems this document seeks to transfer responsibility from Federal to both State & Local Councils. This is unacceptable it must be Federal responsibility as it involves flight movements & CASA are answerable to the Federal government. This will lead to buck passing at each level as we are experiencing with the second runway at Brisbane airport no one takes responsibility.
- 15. The department is responsible for managing complaints and enquiries about drone noise. [Community feedback](#) can help identify issues of concern and possible opportunities for improvement. The department works with local authorities to ensure community feedback received from different sources is recorded.**

² Reference – Safe Work Australia

³ Reference – Safe Work Australia

- The guidelines and regulations are way too loose to have any affect, it will be the same outcome as the Brisbane community currently experience with the second runway at the Brisbane airport, no regulation and state capture by corporate Australia.

16. As an emerging industry, there may be significant variation in the noise emissions from drone delivery operators in the future. If drone delivery operations in the future are found to be causing a significant noise impact, this advice may be reviewed.

- What will be the trigger point for commencing a review? Surely the process should be outlined and transparent not left for some future discussion the Australian people deserve better than this.

Land use planning considerations

17. Drone delivery services currently do not require new or complex infrastructure for consideration in land-use planning processes.

- How can this statement be true? They need to be near the source of freight they are to deliver & I know of no warehouse that currently has a Drone landing/take off area so a NEW & COMPLEX piece of infrastructure is required with regulation & guidelines. Separation from current activities, traffic & people movement are just a start. Australia does have safety standards is the Drone industry to be exempt from these?

18. It is recommended that planning processes should treat drone delivery infrastructure as an ancillary use to the primary purpose of the development where the drone delivery infrastructure is located.

- Why only recommendations, this should be clearly defined as without clear guidelines it will lead to intergovernmental disputes

19. Local governments should consider accommodating drone delivery operations within existing land use zones where they are unlikely to cause a significant noise impact.

- a. Depending on the local environment, ambient noise and proposed drone technologies or operations, a separation distance of 100-400m between drone delivery hubs and residential areas is a reasonable starting point for planning and/or consultation purposes.**
- b. Planning authorities should also consider cases put forward by operators which demonstrate how impacting noise can be mitigated to acceptable levels.**

20. Planning controls for other forms of aviation infrastructure such as airports or helipads are not appropriate for considering approvals of drone delivery infrastructure, as drones are significantly less complex than traditional aircraft such as helicopters or passenger planes.

- They are however noisy & potentially deadly machines when they come in to contact with people. Your use of terms such as less complex appears to downplay the risks to peoples safety & the mental health impacts of noise levels.

21. Approvals for drone delivery services should also consider the impact of future developments and changes to neighbouring land uses, including providing appropriate protections to ensure the continuity of operations.

- What is the recommended distance from a Drone landing/take off point to any residence?

22. It is not recommended that planning authorities develop or require specific land-use categories or planning controls for small to medium drone delivery infrastructure.

- **So if my neighbour decides to go into the Drone delivery business they will be able to do so? This is absurd some regulations are required and this paper is very short on these details.**

23. For dedicated drone delivery facilities, warehouse or depot use categories may be an appropriate dominant use. For drone delivery services operated from commercial sites, the existing commercial land use category can remain the dominant use.

- No mention is made of home office delivery services where a residential based business commences a Drone delivery service, is this to be acceptable?

24. This approach has been sufficient to manage the relevant land use planning implications of current drone delivery services, including considerations such as parking, loading access and traffic.

- I would expect at the least the Drone landing/take off areas would be secure and not open to public access or inquisitive children getting within these areas.

This document appears to have been written to provide Drone operators with an easy pathway to develop their business and very little if any consideration has been made with regards to its impact on peoples lives and mental health.

I am unaware of any demand for this service within suburban areas of Brisbane, I can however understand the economic benefits for operations in country towns with less populated areas.

The Brisbane community has been impacted with deceit and untruths with the operation of the NPR where noise impacts were understated and we expect the Federal Government to protect Australian people not just corporate Australia.

I also endorse the BFPCA submission Drone Delivery Services Dec 1.

Robert James

