

## Submission 85 – City of Melbourne



**CITY OF MELBOURNE**

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Department of Infrastructure, Transport, Regional Development, Communications  
and the Arts  
Australian Government

## RE: PUBLIC CONSULTATION ON INFRASTRUCTURE PLANNING GUIDELINES FOR DRONE DELIVERY SERVICES

The City of Melbourne welcomes the opportunity to provide input on the proposed planning guidelines for drone delivery services. This submission is provided on behalf of City of Melbourne management.

The City of Melbourne recognises that there may be a future demand for drone delivery services and that these could potentially contribute to the economy and reduce transport congestion and emissions. Drone delivery will also have some negative impacts. These could include additional noise and lighting, which could impact residents and wildlife, as well as an increase in disruptive incidents (such as colliding with a power line or similar). It will be important to manage these negative impacts.

The City of Melbourne is concerned that the proposed guidelines are too broad and that the amenity, safety and privacy impacts associated with drone delivery services need to be effectively managed by appropriate agencies or regulatory bodies. City of Melbourne's Transport Strategy 2030 directs us to 'Protect amenity, privacy and equity as urban air transport technology and services develop.'<sup>1</sup>

The central location and level of activity in this municipality already leads to some noise and disruption from aircraft. In some instances this negatively affects residents, workers and visitors, despite City of Melbourne's Fly Neighbourly program<sup>2</sup> and air traffic regulations. Without careful regulation by aviation authorities, drone delivery services could further exacerbate this issue. Allowing significant numbers of drones to operate in the central city or other high activity areas could present an unacceptable negative impact on the privacy and amenity of the community. This needs to be carefully managed.

Our municipality is densely populated, with many people living in close proximity to each other and a range of commercial and industrial uses. There are few areas that would be more than 400 metres from residential uses (as discussed in 27(a) of the Public Consultation draft). Given this, and the 24-hour economy of the City of Melbourne, we believe there will be a need for controls which can regulate noise and lighting and any other negative impacts.

For planning purposes, the frequency of deliveries to a site may mean that the primary use of the site is a delivery centre. Guidance should be developed for operators, regulators and local governments on how to address high frequency drone operations in built up areas. Specific planning controls may be appropriate for drone facilities which see delivery frequencies above a certain threshold.

The potential use of drone services for advertising needs to be monitored and managed.

In addition, economic activity and population is concentrated in the central city<sup>5</sup> and opportunities to accommodate drone access without impacting on ground level activity could be limited. Rooftop access is in high demand in the municipality for uses such as green roof space, hospitality venues, solar panels and other utilities. Accommodating drone access in a way which is both equitable and offers advantages over surface delivery should be prioritised.

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<sup>1</sup> City of Melbourne (2019). Transport Strategy 2030. Policy 37.

<https://www.melbourne.vic.gov.au/SiteCollectionDocuments/transport-strategy-2030-city-of-melbourne.pdf>

<sup>2</sup> City of Melbourne (2016). Fly Neighbourly Agreement 2016 – example only.

<https://www.melbourne.vic.gov.au/SiteCollectionDocuments/fly-neighbourly-agreement-2016-sample.pdf>

<sup>5</sup> The area within the Hoddle Grid, and including the localities of Southbank, Docklands and South Wharf.



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For these reasons, the City of Melbourne believes that the planning guidelines for drone delivery services should take into account the wide variety of urban environments and allow for a nuanced and context-specific application of land use and other regulatory controls. Safety, amenity, privacy and equity should be prioritised as key factors to be considered when evaluating applications for drone delivery infrastructure.

Guidelines should be developed that deal with drone-based advertising and the frequency of take-offs and landings by many users at delivery sites. The City of Melbourne believes that specific guidelines for areas with high residential and commercial densities and many conflicting land uses should be developed for use by local governments.

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