

29 November 2019

Aircraft Operations  
Aviation Environment Branch  
Department of Infrastructure, Transport, Cities and Regional Development  
111 Alinga Street  
CANBERRA ACT 2601  
Via: [noise@infrastructure.gov.au](mailto:noise@infrastructure.gov.au)

To whom it may concern,

Tourism & Transport Forum Australia (TTF) is the peak national industry association for the tourism, transport and aviation sectors.

I write in response to the Department of Infrastructure, Transport, Cities and Regional Development's Issues Paper, *Review of the Air Navigation (Aircraft Noise) Regulations 2018 - Remotely Piloted Aircraft*.

TTF is the only national multi-modal transport advocacy group in Australia and is committed to improving the quality of transport and mobility across the country for the benefit of locals and visitors alike.

We aim to promote the importance of investment by policymakers in transport infrastructure, the critical role of the private sector in the development of transport and delivery services and finally the commitment to best practice in customer service, particularly through the onset of new technology.

Our firm view is that as policymakers aim to address liveability challenges including population growth, urbanisation, congestion, pollution and increased carbon emissions, building new infrastructure alone is not enough. While new infrastructure is critical, Australia cannot just build its way out of congestion.

New transport technology can directly help to address these challenges and increase the productivity and improve the liveability of our cities and regions. This technology is continuing to rapidly transform all modes of transport and delivery across Australia and this presents a wide range of benefits.

New technology like *remotely piloted* delivery drones enable safer delivery options, improved delivery times, less environmental impacts than some other delivery modes and reduced delivery costs both for consumers and for businesses.

TTF welcomes this issues paper, applauds the Australian Government's commitment to reviewing the Air Navigation (Aircraft Noise) Regulations 2018 and makes four key points as part of this process:

1. Lightweight remotely piloted delivery drones should be treated more like vehicles rather than traditional aircraft with respect to proposed regulations, as their average overfly noise level is more similar to, and in fact less than, passby vehicle noise.
2. Restrictions should not be based on total number of flights per day, the duration of flight or how many flights per hour as this sort of regulation is more applicable to traditional aircraft than to drones or vehicles.
3. There should be no distinction between types of drone use when regulating operations or exemptions depending on use as there is no distinction between different types of vehicle use.

4. Any discussion around noise regulation should be considered as part of the wider whole of government review of drone use rather than in fragments as part of separate discussion papers or policies.

Policymakers should adopt a common-sense approach to the regulation of *remotely piloted* delivery drones and the similar new technology termed by policymakers as *urban air mobility* drones.

Both emerging forms of transport, particularly *remotely piloted* delivery drones, are very different to traditional aircraft with respect to how they move within their communities, the types of services they provide and their noise impacts.

Australians are increasingly embracing new forms of transport mobility in their lives and the flexibility that this provides particularly with respect to convenient delivery options for common household items and a shared economy where private vehicles are increasingly considered optional rather than necessary.

Recent consumer research conducted by TTF and its partners highlighted that some 24 per cent of Australian consumers don't believe that they will still own a car in 10 years' time and some 67 per cent of consumers can imagine a future where people or goods are transported by flying autonomous drones.

It is encouraging that policymakers are thus far taking a positive and proactive approach to preparing for a smarter mobility future which will encourage ongoing confidence and continued international and local investment from the private sector as well as greater flexibility, improved liveability and improved environmental outcomes.

How policymakers continue to manage innovation and disruption in the transport and mobility sector will be critical to successfully addressing future mobility challenges and to attracting further investment.

I look forward to continuing these discussions with the Department of Infrastructure, Transport, Cities and Regional Development and TTF Manager Policy and Government Relations Lindsay Hermes [REDACTED] will remain in touch regarding next steps.

Yours sincerely



**Margy Osmond**  
Chief Executive Officer  
Tourism & Transport Forum (TTF) Australia