

5 December 2019

[REDACTED]  
Aviation & Airports Division  
Department of Infrastructure, Transport, Cities and Regional Development  
GPO Box 594  
Canberra ACT 2601

Via email: [noise regulation@infrastructure.gov.au](mailto:noise regulation@infrastructure.gov.au)

Dear [REDACTED],

I am writing to you in relation to your Department's recent invitation to the Australian Airports Association (AAA) to provide a submission to the *Air Navigation (Aircraft Noise) Regulations 2018* review.

The AAA welcomes the opportunity to provide input into the review process, particularly given our airport members represent significant pieces of infrastructure that will be directly and indirectly affected by the changes to noise regulations, particularly those related to 'drones' (either Remotely Piloted Aircraft [RPAS] and Urban Air Mobility [UAM] systems).

The AAA is generally supportive of the proposed regulatory approach put forward in the Department's issues paper. The AAA and its members agree that the allocation of responsibilities for managing and regulating drone noise are appropriately delegated in the issues paper.

The AAA is particularly supportive of Proposal F, where state/territory governments would be able to regulate noise from drones where not inconsistent with Commonwealth legislation. The AAA believes that by putting greater responsibility for drone noise onto state and territory governments, they would better understand the issues involved with managing aircraft noise in urban areas and the effects of land use planning decisions for drones (such as approvals for commercial RPAS and UAM systems) on amenity in the urban environment.

A significant concern raised by our airport members is that the activities and noise generated by drones do not become a default issue for airports to manage and resolve. Given that many drone systems (such as delivery drones) do not need an airport for take-off and landing and can be launched and recovered in urban areas, the regulation of drone noise would be best placed with state and territory environmental protection agencies (EPA).

In respect to Proposal E, where UAM operators would be required to produce Australian Noise Exposure Forecast (ANEF) profiles around take-off and landing sites to identify and manage noise effects, the AAA wishes to highlight the following concerns regarding the proposed regulations:

- That airports, as 'known' generators of aviation noise can clearly identify themselves as not responsible for noise and activity by drones using urban areas for take-off and landings (i.e. delivery drones);
- A third party (e.g. CASA or a state/territory EPA) should be responsible for monitoring and managing noise generated from drones;
- That ANEF profiles developed by UAM operators under this proposal should be identified as separate to ANEF profiles developed by airports, and;
- That airports, or at least airports subject to the *Airports Act 1996*, should not be responsible for communicating noise impacts associated with UAMs, whether as part of an ANEF or other noise metric.

Further, the AAA encourages the Department consider the use of N-Above metrics by drone operators as a requirement to identify and manage potential noise impacts, either in place of, or in conjunction with ANEF metrics. While the ANEF is useful for decision making in land-use planning it is widely accepted that N-Above charts provide better understanding of potential noise impacts and are easier to communicate to the general public.

I would welcome the opportunity to discuss any of these issues with you further and, should you have any questions, please do not hesitate to contact me via Simon Bourke (Policy Director, AAA) on [REDACTED]

Yours sincerely,



Caroline Wilkie  
Chief Executive Officer