



Mr Benedict Lyons
Director Airspace and Future Technology
Department of Infrastructure, Transport, Regional
Development and Communications
GPO Box 594
Canberra ACT 2601

9 November 2020

Dear Mr Lyons

Re: Emerging Aviation Technologies: National Aviation Policy Issues Paper

Thank you for the opportunity to comment on the abovementioned Issues Paper.

Sydney Airport congratulates the Department of Infrastructure, Transport, Regional Development and Communications (DITRDC) for addressing emerging aviation technologies and for consulting key stakeholders, including airports, about future policy in this vitally important area.

This submission addresses airport-related issues associated with the use of drones and electric vertical take-off and landing (eVTOL) vehicles.

As the Deputy Prime Minister recently said, drones have significant potential to boost the nation's economy while creating thousands of jobs. There are significant potential benefits for the nation's economy over five, 10- and 20-year periods. These potential benefits are recognised and supported.

From Sydney Airport's perspective, it will be important to ensure that the increasing use of drones and/or the introduction of eVTOL vehicles for the first time does *not* in any way impede Sydney Airport's ability to operate safely and efficiently.

Safety and efficiency could be adversely affected if, for example, drones and/or eVTOL vehicles were permitted to operate in a way that interfered with air operations at Sydney Airport, be that for passenger, freight or other air services. As the operation of drones and/or eVTOL vehicles would not appear to be a "controlled activity" for the purposes of the *Airports Act 1996*, and to avoid a regulatory vacuum, another appropriate regulatory framework will need to be put in place to ensure airports and their prescribed airspace are properly protected. This new framework could take the form of a new guideline under the National Airports Safeguarding Framework, which would have the added benefit of ensuring consistency across all airports.

By way of background, Sydney Airport has already closely engaged with public land managers in the vicinity of the airport or under flight paths concerning the use of drones within their areas. This has included several local government authorities and the NSW National Parks and Wildlife Service (NPWS).

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In particular, we have suggested to councils that they erect CASA-approved signage in public reserves and national parks that are both close to the airport and/or lie beneath one of Sydney Airport's flight paths. An example of our engagement is shown in the **Attachment** to this letter.

The issue of enforcing the prohibition on drone use in these areas is important. Currently, CASA is responsible for regulating the use of drones in these areas. However, CASA does not have authorised officers patrolling those areas, and presumably does not have the resources to do so. This means the unlawful use of drones around the airport could in many cases be undetected and certainly unpunished. As the relevant local councils and NPWS *do* employ officers who regularly patrol such areas of public land, we believe those officers should be authorised by CASA to police the drone regulations within their areas of responsibility. At the very least, they could be authorised to issue cautions.

The only other issue we'd like to raise regarding the use of drones and/or eVTOL vehicles concerns noise. While it's still an important issue for many in the community, the number of noise complainants in areas close to the airport or under flight paths has been steadily decreasing over time. In fact, despite the number of flights growing by around 16% between 2008 and 2019, the number of noise complainants fell by nearly 80% over that same period, from a high of 2,972 in 2010 to a record low of 620 in 2019. It will be important to ensure that effective strategies are in place to ensure the use of drones and/or eVTOL vehicles does not cause the number of noise complainants to start increasing again.

Thank you for your information,
please feel

Yours sincerely

Ted Plummer
Special Adviser Government and Community Relations



Ms Meredith Wallace
General Manager
Bayside Council
PO Box 21
Rockdale NSW 2216

17 December 2019

Dear Ms Wallace

New CASA-approved signage available to regulate drone activity in areas around Sydney Airport

Earlier this year, I wrote to various councils and other public land managers in the vicinity of Sydney Airport about remotely piloted aircraft systems (also known as drones).

Drone activity in Australia is currently regulated by the Civil Aviation Safety Authority (CASA) under the *Civil Aviation Safety Regulations 1998* (the regulations). CASA applies those regulations consistent with its statutory aviation safety-related obligations.

The regulations include a list of areas where inappropriate drone activity is prohibited, including areas within 3Nm (or within 5.5km) of a controlled aerodrome. This includes Sydney Airport. The prohibited area for drone activity around Sydney Airport therefore includes parts of the Bayside, Inner West, Randwick City, City of Sydney, Canterbury-Bankstown, Georges River and Sutherland Shire local government areas.

In the interests of ensuring aviation safety, Sydney Airport is keen to ensure that the prohibition on inappropriate drone activity within 5.5 km of the airport is consistently and strictly observed. This includes within large areas of open space such as public parks or reserves, golf courses, Kamay–Botany Bay National Park, Towra Point Nature Reserve, Centennial and Moore Parks as well as Botany Bay itself.

My original letter suggested councils consider relying on section 632 of the *Local Government Act 1993* to erect notices that prohibit drone activity in designated locations, including public parks or reserves. However, based on feedback we received from a number of councils, there is a preference for there to be agreed and consistent drone signage rather than having potentially different signage in each council area.

I can now advise that CASA has now developed standardised national drone safety signage.

The two types of CASA-approved signs – which are shown at **Attachment A** – are:

1. Caution: drone rules apply
2. No drone zone

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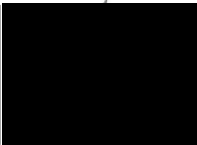
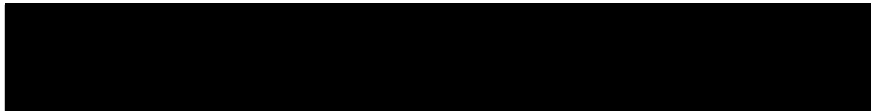
Sydney Airport Corporation Limited ACN 082 578 809 — The Nigel Love Building, 10 Arrivals Court, Locked Bag 5000
Sydney International Airport NSW 2020 Australia — Telephone +61 2 9667 9111 — sydneyairport.com.au

Given the CASA regulations, the "No drone zone" sign would be the appropriate one to use within 5.5km of Sydney Airport. More information about each sign, enforcement and penalties and details of how to seek and obtain CASA approval for their use, can be found at: <https://www.casa.gov.au/drones/rules/drone-signage>.

To assist council, charts showing the flight paths that are typically used by both jet and non-jet aircraft flying to and from Sydney Airport are shown at **Attachment B**. These charts form part of Sydney Airport's *Master Plan 2039*. It's important to also note that flight paths can vary in practice by up to several kilometres or more. This occurs for a range of reasons including weather conditions, requirements for aircraft separation or variations in aircraft performance.

The parks, reserves and other areas of public open space within the Inner West local government area that generally align with these flight paths and where council could consider placing these signs are listed in **Attachment C**.

We urge council to consider placing signs in these areas. We would also be happy to meet with and brief council in more detail about this issue.



General manager Operations

Sydney Airport

Caution: drone rules apply

No drone zone



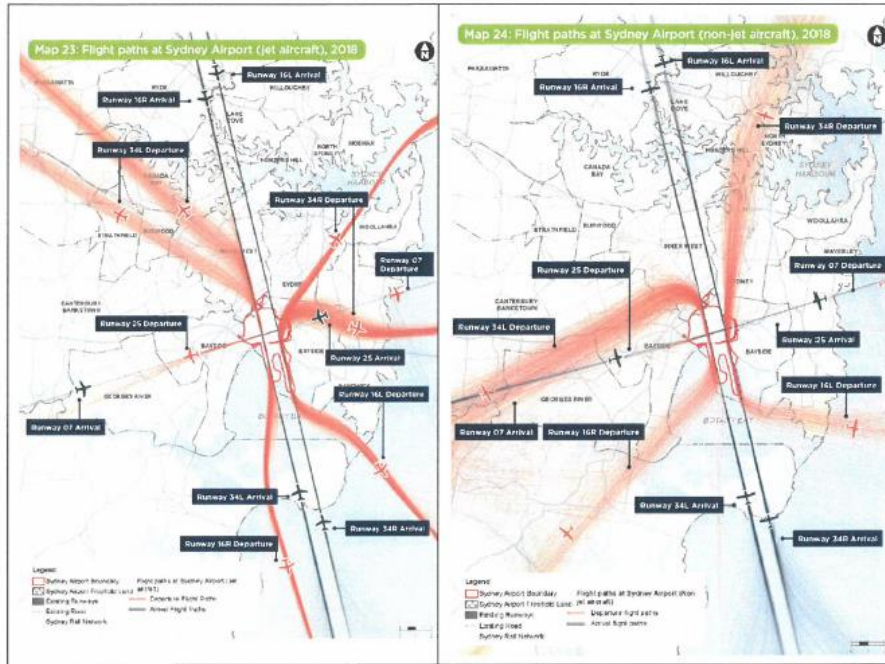
This is a warning sign. It's designed to tell people that there are added conditions or laws that may prevent you from operating your drone in the location it's signposted.

This is a prohibition sign. It's designed to tell people that they must not fly their drone in the location it's signposted. It has a universally recognisable red circle with a diagonal line across the drone symbol.

This sign can only be displayed within 3 nautical miles (5.5 km) of the movement area of a controlled aerodrome or airport and in the approach and departure paths.

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Flight paths at Sydney Airport (jet and non-jet)



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Attachment C

Location	Approximate distance from Sydney Airport boundary
<i>Western side of Sydney Airport</i>	
Kogarah Golf Club	< 0.5 km
Kyeemagh Boat Ramp Reserve	< 0.5 km
Barton Park	< 1.0 km
Cahill Park	< 1.0 km
Brighton Le Sands beach front	Between 1.0 and 3.0 km
Lance Studdert Reserve	< 1.0 km
C A Redmond Field	2.0 km
Ador Avenue Reserve	2.0 km
McCarthy Reserve	2.2 km
Civic Avenue Reserve	3.3 km
Scarborough Park	3.8 km
<i>Eastern side of Sydney Airport</i>	
Sir Joseph Banks Park	< 0.5 km
Boorolee Park	< 1.0 km
Eastlake Golf Club	< 2.0 km
The Lakes Golf Club	< 3.0 km
L'Estrange Park	1.3 km
Mascot Oval	1.5 km
Mutch Park	2.5 km
Bonne Doon Golf Club	3.0 km
Jellicoe Park	3.2 km

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