

Adfree Cities - Briefing for the Commons Committee Stage of the Levelling Up and Regeneration Bill

12th August 2022

Overview

1. The Levelling up and Regeneration Bill presents a unique opportunity to ensure the planning system is fit for people, nature and the climate.
2. Adfree Cities is a network of local groups across the UK who are concerned about the impacts of outdoor advertising on our health, wellbeing, environment, climate, communities and the local economy. We welcome the elements of the Levelling up and Regeneration Bill which seek to increase the accessibility of neighbourhood planning and the engagement of communities in planning decisions, as well as to give local councils more autonomy in making decisions about planning at a local level. The focus on creating beautiful places and improving environmental outcomes is also key to improving individual health and wellbeing and supporting local ecology.
3. We particularly welcome the revision of the National Planning Policy Framework (NPPF) as we are increasingly **concerned about the scale and growth of planning applications for more intrusive digital out-of-home advertising (OOH) sites**. Our key concern is that **current planning regulations dating back to 2007¹ were not designed with new digital billboard technology in mind**, and are not enabling councils to make decisions in line with new policy goals including public health and the transition to Net Zero.
4. However, we fear that **it will be a missed opportunity if amendments to planning policy that controls outdoor advertising are not included in the Bill** as advertising structures have a significant impact on local areas and on Net Zero targets.
5. We recommend that three parallel and complementary approaches should be explored:
 - As part of revising the NPPF and National Development Management Policy, **regulations on outdoor advertising should be updated to take into account the unique problems with digital billboards**, and to enable councils to respond to applications according to their current priorities, not just the

¹ Town and Country Planning (Control of Advertisements) (England) Regulations 2007
<https://www.legislation.gov.uk/uksi/2007/783/made>

narrow grounds of 'amenity' and 'public safety' that the 2007 legislation currently permits.

- The Bill should be amended to **enable local councils to adopt planning policies on digital outdoor advertising**. For example, this could take the form of a presumption against planning applications for digital billboards on the grounds of carbon emissions, light pollution, biodiversity, impact on local residents and road safety. This would better reflect the proposal set out within the Levelling Up and Regeneration Bill for local communities to have a greater say in how the built environment is shaped around them.
 - In line with the Bill's commitment to enabling pre-application engagement with communities to be required before a planning application is submitted, this should **include a requirement to carry out pre-application consultation for advertisement sites**, equal to that required for development of any land under section 122 of the Localism Act 2011. This is to ensure that residents who will be impacted by new advertising sites, and particularly digital screens, know about potential planning applications and have an opportunity to comment on them.
6. We are concerned that many of the welcome and needed provisions in the Bill are dependent upon an effective and well-resourced planning system to deliver them, but are aware that a legacy of cuts has left local planning authorities under-skilled and under-resourced. Therefore, making planning processes more democratic and giving councils the opportunity to implement more far reaching policies on outdoor advertising would also **reduce the administrative burden on local authorities**.

Summary of key concerns and comments on the Bill

Outdated planning policy does not reflect new policy goals

7. Circumstances have materially changed since 2007, shown by the number of planning applications that are being submitted for outdoor digital advertising screens and changing advertising technologies relating to facial detection and user tracking capabilities.² In addition, since 2007 the climate crisis has substantially worsened, and the UK Government and over 300 local authorities have made policy commitments to reduce emissions having declared a Climate Emergency. Current planning policies and guidance are outdated and do not accommodate residents legitimate concerns around climate and sustainability, environmental light pollution, mental health and the dominance of commercial

² *Bristol's new phoneboxes could end up spying on you* , The Bristol Cable , 17 April 2018
<https://thebristolcable.org/2018/04/opinion-bts-spy-kiosks-could-be-coming-to-bristol/>

messaging in public space. The emergence of digital screens has been such a dramatic change that it has been described as ‘changing the face of London’.³

8. There are also increasing calls for the planning, public health and climate agendas to work together to achieve wider policy goals. For example, the British Medical Journal (BMJ) has called for multidisciplinary action in planning and health in order to contribute to more equitable communities and improved health and wellbeing⁴ - it is becoming clear that the impact of public advertising is currently a blind spot in this effort.
9. The ‘Planning for the Future’ White Paper (2020) stated that: *“planning should be a powerful tool for creating visions of how places can be, engaging communities in that process and fostering high quality development: not just beautiful buildings, but the gardens, parks and other green spaces in between, as well as the facilities which are essential for building a real sense of community. It should generate net gains for the quality of our built and natural environments - not just ‘no net harm’.”*
10. However, current regulations only allow adverts to be approved or refused on two narrow grounds of ‘public safety’ and ‘amenity’ which ignores the multiple additional impacts of outdoor advertising. These grounds also do not take into account the particular problems with digital billboards, including:
 - they use an excessive amount of electricity; a conservative estimate on the energy requirements of a large new screen is the equivalent of 11 average UK homes;⁵
 - they cause light pollution, affecting people (particularly those with photosensitivity) and wildlife;⁶
 - they are extremely intrusive, being glaring and unavoidable;
 - they expose us to more and more unwanted commercial adverts in public space where they are impossible to avoid, showing up to six ads per minute;
 - they are extremely distracting to drivers, causing unacceptable risks to safety (it can be argued that all digital billboards should be refused on this basis);
 - they raise questions over privacy, as some structures incorporate surveillance technology;
 - they encourage unnecessary and wasteful overconsumption of goods and services (consumption beyond levels needed to meet decent quality of life standards), which is reckless in a time of climate and ecological crisis.⁷

³ Rise of digital billboards changing the face of London, Evening Standard, 22 October 2014
<https://www.standard.co.uk/business/media/media-rise-of-the-digital-billboards-changing-the-face-of-london-9810062.html>

⁴ McKinnon et al., 2020. Strengthening the links between planning and health in England
<https://www.bmj.com/content/369/bmj.m795>

⁵ The electricity cost of digital adverts, Adfree Cities, 28 November 2019
<https://adfreecities.org.uk/2019/11/the-electricity-cost-of-digital-adverts/>

⁶ Digital advertising and light pollution, Adfree Cities (2021)
<https://adfreecities.org.uk/wp-content/uploads/2022/01/Advertising-and-Light-Pollution-Adfree-Cities-Briefing.pdf>

⁷ Advertising’s role in climate and ecological degradation, Badvertising (2020)
<https://www.badverts.org/s/Advertisings-role-in-climate-and-ecological-degradation.pdf>

- research shows the real-world impacts screens have on their near neighbours; including impacts on mental health, sleep quality and ability to enjoy the area in which they live.⁸
11. These grounds above cannot be formally considered by planning authorities. Therefore, local residents are disempowered to object and communities continue to be blighted by an increase in digital screens resulting from inadequate planning regulation. Additional regulations are needed to allow councils to refuse applications based on wider grounds than just ‘public safety’ and ‘amenity’ and the revision of the NPPF provides the perfect opportunity for this.
 12. ‘Public safety’ grounds must also be updated in relation to the particular harms caused by digital screens. Peer-reviewed evidence shows that digital billboards are substantially more distracting for drivers, particularly younger drivers, causing severe additional concerns over road safety for all road users.⁹
 13. National planning regulations and guidance on outdoor advertising must be updated to take into account the unique problems with digital billboards, and to enable councils to respond to planning applications according to their current priorities, not just the narrow grounds of ‘amenity’ and ‘public safety’ that the 2007 *Town and Country Planning Regulations* (England) legislation currently permits.

Socio-economic impact of outdoor advertising

14. We absolutely agree that “*a strong planning system is vital to level up communities across the country and give them a say in how their land is used*”. However, we also know that there is a disproportionate concentration of outdoor advertising in the most deprived areas.¹⁰ Billboards are mostly placed next to busy roads which are usually in lower income neighbourhoods; while wealthier neighbourhoods have greater social and political capital to oppose new advertising billboard planning applications, and are better able to make use of heritage and preservation orders to resist new ad sites. Some Business Improvement organisations are also opposed to billboards on the basis that large roadside adverts give a sense that an area is to be driven through, rather than somewhere people should stop to spend time.¹¹ This directly undermines the Levelling Up agenda and town centre regeneration strategies outlined in the Bill. Therefore, planning policy relating to outdoor advertising should be included in the reforms to ensure all communities can positively influence what their local area looks like.

⁸ Adblock Bristol research (2021) [Living next to digital billboards](#)

⁹ *The Impact of Road Advertising Signs on driver behaviour and implications for road safety: A systematic review*, Oviedo-Trespalacios et al. (2019) <https://doi.org/10.1016/j.tra.2019.01.012>

¹⁰ *How outdoor advertising can deepen inequality*, BBC, 20 August 2020 <https://www.bbc.com/worklife/article/20200817-the-inequality-of-outdoor-advertising-exposure>

¹¹ Bedminster Business Improvement District opposition to billboards Adfree Cities, May 2020 <https://adfreecities.org.uk/bristol/bedminster-business-improvement-district/>

15. We support the recommendation from the Better Planning Coalition that the Bill should include a new duty on authorities to reduce health inequalities and improve wellbeing in the exercise of their planning functions. Advertising in particular can have significant impacts on physical and mental health and wellbeing¹² and so reducing ads in public spaces can have a positive impact on public health¹³ and equality.

Climate and sustainable development

16. The planning system needs to consistently support developments whose location, design and use promote the transition to Net Zero while rejecting those which are carbon intensive. The Bill must take the opportunity to ensure that the planning system plays its part to tackle the climate emergency.
17. The rise in digital advertising screens in recent years is pushing up and locking-in energy demand due to their high electricity usage and goes against local authorities' efforts to deliver on their climate targets. This new digital infrastructure comes with a considerable impact on the environment. Not only are these billboards highly energy-demanding but they also present a threat to local biodiversity by creating greater light pollution.¹⁴
18. Research shows that a 'six-sheet' sized double-sided digital billboard (often found at bus stops) requires the same electricity as four average UK households per year. Other larger billboards were found to consume as much electricity as 37 households a year when running at their maximum capacity.¹⁵
19. The Bill needs to establish clear duties requiring policies, plans, assessment processes and individual planning decisions to put sustainable development and the health and wellbeing of people, and tackling the nature and climate emergencies at the heart of the planning system. Enabling restrictions to energy intensive outdoor advertising screens would help to "ensure there is a clear focus on protecting our environment, pursuing positive environmental improvements" as the Bill states.

¹² *Because you're worthless? How corporate outdoor advertising makes us feel bad, to sell us stuff we don't need*, Adblock Bristol (2018) <https://adfreecities.org.uk/resources/advertising-mental-health/>

¹³ *Junk food advertising restrictions prevent almost 100,000 obesity cases and is expected to save the NHS £200m*, London School of Hygiene and Tropical Medicine, 2 August 2022 <https://www.lshtm.ac.uk/newsevents/news/2022/junk-food-advertising-restrictions-prevent-almost-10000-obesity-cases-and#:~:text=Restrictions%20for%20junk%20food%20advertising,Behavioural%20Nutrition%20and%20Physical%20Activity>

¹⁴ *Digital advertising and light pollution*, Adfree Cities (2021) <https://adfreecities.org.uk/wp-content/uploads/2022/01/Advertising-and-Light-Pollution-Adfree-Cities-Briefing.pdf>

¹⁵ *The electricity cost of digital adverts*, Adfree Cities, 28 November 2019 <https://adfreecities.org.uk/2019/11/the-electricity-cost-of-digital-adverts/>



Adfree Cities is a network of groups across the UK who are concerned about the impacts of corporate advertising on our health, wellbeing, environment, climate, communities and the local economy. We campaign for happier, healthier cities free from the pressures of corporate outdoor advertising.

www.adfreecities.org.uk

For more information please contact charlotte@adfreecities.org.uk