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Submission to the Inquiry into Billboards Standing Committee on Planning and Urban Renewal

Submission from:

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	A.C.T. LEGISLATIVE ASSEMBLY COMMITTEE OFFICE
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I am happy for this submission to be made public, and would be more than happy to appear as a witness at any public hearings, in order to explain or expand on any of the issues discussed in the submission.

Executive Summary

- Canberra's mostly ad-free state, as part of its natural beauty, is one of the city's most precious features. It should be cherished and protected, not whittled away.
- Encroachments of advertising into public space should be pushed back with stricter enforcement, not used as an excuse to wind back regulation.
- Canberra, as our nation's capital and the home of our government and public service, should be particularly careful about our public space. Advertising hands public space to private interests, enclosing the commons, and as such has no place in Canberra.
- Advertising is not just unpopular and ugly; there is abundant evidence that it has negative social impacts, driving materialist behaviour which is linked to higher rates of depression, mental illness, interpersonal violence and antisocial behaviour.
- Around the world, cities and communities are coming together to remove advertising from the streets. Far from opening up more space to advertising, Canberra should push back against advertising's encroachment, removing it from public transport, bus shelters, road sides and buildings, and protecting the beauty of our bush capital.



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1. Rationale for restricting advertising

Term of reference 1(a)

Advertising is ugly and unpopular; it is privatisation of public space, enclosing the commons for private profit; and it has deeply damaging impacts on our society at large.

The first two of these points are already understood and expressed in existing rationales for restricting advertising in Canberra, which can be read from current regulations to include:

- Visual and community amenity, including heritage values, design, and the natural environment;
- Avoiding hazards to pedestrians and traffic; and
- “Not compromis[ing] the role of the Territory as the setting of the National Capital and Seat of Government of the Commonwealth”.¹

However, when considering the future regulation of advertising, we need a deeper understanding of its role and impact.

1.1. Ads are ugly:

The fact that advertising is unattractive is clearly understood in the restrictions for visual amenity.

Canberra’s “bush capital” natural beauty is one of the most precious aspects of our city, something that sets it apart from other major Australian and world cities, and sees it regularly ranked as one of the world’s most livable cities. Our heritage architecture is also much loved, including the “UFO” bus shelters which have in too many cases been replaced with Adshel shelters identical to those found in any other city in Australia and elsewhere, erasing a unique part of our social and cultural history.

Imagine if the views of the snow-capped Brindabellas, or the tree-lined streets full of birds, or the heritage architecture, were obscured by billboards and other roadside advertising. This process would ruin the Burley Griffins’ vision and obliterate one of Canberra’s special points of difference, turning the city into another bland, cookie-cutter metropolis.

1.2. Ads privatise public space:

As the seat of our government, public space in Canberra is vitally important.

Canberra is a city of government, public service, tertiary education, and national cultural institutions. It is a city whose citizens are proud of its place in our

¹ ACT Planning and Land Authority, *Signs General Code*, March 2008, 2.1 (d), <http://www.legislation.act.gov.au/ni/2008-27/copy/56699/pdf/2008-27.pdf>



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nation, a city which represents the public interest. It is a city which hosts politicians, public servants, lobbyists, visiting school students, tourists and more, for all of whom a public space in the public interest is of vital importance.

Advertising hands public space to private interests, enclosing the commons. It sends a clear and unambiguous message to all who view it that the space is no longer theirs, that it now belongs to a private company to profit from. It embeds the social and cultural primacy of private profit over public interest into our lived environment.

This is damaging for all cities and all public space, but it has no place at all in Canberra, where public space is representative of the city's public role.

1.3. Advertising has deep negative social impacts:

Existing regulations note the hazards to pedestrians and traffic from advertising, but this concept should be expanded to include hazards to the community at large from increased advertising. Advertising makes us unhappy and restless; it drives materialism, which is linked to higher rates of depression, interpersonal violence and antisocial behaviour; and it erodes pro-social and pro-environmental values necessary for the maintenance of a flourish city.

The advertising industry has remarkable insight into its own impact:

- Nancy Shaley, president of the Shaley Agency, describes her profession thus: "Advertising at its best is making people feel that, without their product, you're a loser."²
- Jonathan Trimble, chief executive of ad agency 18 Feet & Rising, says: "Of course advertising makes us unhappy. There's too much of it; we can't screen it out and its premise is to promote extrinsic value – happiness being intrinsic."³
- And Omaid Hiwaizi, planning director of SapientNitro, told advertising industry magazine Campaign Live that "the true essence of advertising is to make you want more. It is designed to make you restless, leaving little room for contentment."⁴

As long ago as 1951, Marshall McLuhan wrote in *The Mechanical Bride* that "a helpless state engendered by prolonged mental rutting is the effect of many ads."⁵ More recently, former ad executive Greg Foyster described the result of

² As quoted in Tim Kasser, *The High Price of Materialism*, Cambridge, Mass: MIT Press, 2002.

³ "Does advertising make people happy?", *Campaign Live*, February 7, 2013, <http://www.campaignlive.co.uk/article/does-advertising-people-happy/1169637#joxpzRyIO2YApZQC.99>

⁴ *ibid.*

⁵ Marshall McLuhan, *The Mechanical Bride: Folklore of Industrial Man*, Beacon Press, 1961, p.v.



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advertising as a “culture of discontent”.⁶ Is this the kind of culture we want for our city, a city of government, public service, universities, and national cultural institutions?

In her PhD thesis on advertising,⁷ Sally Ruth Wengrover discusses the fact that, when we have an unfulfilled need, our brains release dynorphin, which makes us uncomfortable, restless and irritable. When we fulfil the need, our brains immediately release dopamine, making us satisfied. This is a chemically addictive process which Wengrover demonstrated is triggered by exposure to advertising, which continually create unfulfilled needs, continually feeding our addiction.

Much of the in depth psychological research backing up these conclusions has been collated by Tim Kasser in his book, *The High Price of Materialism*. Kasser’s own research, and that of the many others he cites, show a clear link between exposure to advertising and increased materialism, which in turn is linked to higher rates of depression, interpersonal violence and antisocial behaviour. Consumer culture promoted by advertising, Kasser says, “breeds a narcissistic personality”.⁸ Justin Thomas, associate professor of psychology at Zayed University, calls advertising a “psychological pollutant” that is “often implicated in the onset of psychological disorders” including dysphoria and clinical depression.⁹

Kasser describes how advertising emphasises extrinsic values such as wealth and status. It has been repeatedly demonstrated, by Kasser and others, that the more we are exposed to such extrinsic values, the more they suppress intrinsic values that include care for others, sense of community, and care for the environment. Importantly, this psychological effect takes place regardless of the attention paid to the ads and regardless of the values directly expressed by the ads.

Some of Kasser’s colleagues, in a report entitled *Think of Me as Evil*, write that simply seeing ads presenting extrinsic values is a form of social modelling of these values, eroding support for social and environmental action.¹⁰ And even

⁶ Greg Foyster, *A New Critique of Advertising*,
<http://www.wheelercentre.com/notes/b455baf1ac9d>

⁷ Sally Ruth Wengrover, *Should Advertising Remain a Tax-Deductible Business Expense?*, PhD thesis, 2009, <http://drum.lib.umd.edu/handle/1903/9134>

⁸ Tim Kasser, *The High Price of Materialism*, MIT Press, 2002.

⁹ Justin Thomas, “Remove billboards for the sake of our mental health”, *The National*, January 25, 2015,
<http://www.thenational.ae/opinion/comment/remove-billboards-for-the-sake-of-our-mental-health>

¹⁰ Alexander, Crompton, Shrubsole, *Think of Me as Evil*, a report for the Public Interest Research Centre and WWF-UK, October 2011, p31



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ads which express intrinsic values such as positive community life or love of nature are likely to end up activating extrinsic values when their final message is that those values are only attainable through purchase of a particular product or experience:

Advertising that seeks to sell a product through appeals to intrinsic values—for example, promoting a fast-food chain by claiming that it will improve the quality of family life — risks reinforcing the perception that intrinsic values can be meaningfully pursued through the purchase of particular products. Where a customer feels, on purchasing this product, that it falls short in expressing these values, this experience may serve to erode a person's future commitment to pursuing these intrinsic values.¹¹

Advertising in public space is of particular concern thanks to its ubiquity and incorporation into our lived environment.

Richard Pollay, in an article entitled *The Distorted Mirror: Reflections on the Unintended Consequences of Advertising*, writes that "The proliferation and the intrusion of various media into the everyday lives of the citizenry make advertising environmental in nature, persistently encountered, and involuntarily experienced by the entire population. It surrounds us no matter where we turn intruding into our communication media, our streets, and our very homes."¹²

This is deliberate. One company, Capital Outdoor, proudly declare of their product: "Outdoor advertising... incorporates your targeted branding message into the everyday landscape of commuters and becomes part of the very fabric of the living and working environment where it is placed."¹³

This is what Canberra would be opening our doors to if we allow further encroachment of advertising into our public spaces.

2. Terms and effectiveness of existing regulations

Terms of reference 1(b) and (c)

Canberra's regulation of billboard and other public space advertising has been ahead of the curve, preventing the wholesale takeover of public space by private interests that cities like Sydney and Melbourne have seen.

http://assets.wwf.org.uk/downloads/think_of_me_as_evil.pdf?ga=1.255065099.289113427.1466121782

¹¹ Ibid, p33

¹² Pollay, Richard W, "The distorted mirror: Reflections on the unintended consequences of advertising", *Journal of Marketing*, 50, 1986, 18-36.

¹³ <https://www.theguardian.com/cities/2015/aug/11/can-cities-kick-ads-ban-urban-billboards>



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However, in recent years, there have been both deliberate and accidental encroachments on this protection of public space. Rather than using this as an excuse to roll back those important protections, we should take this opportunity to take back control and commit to more effective enforcement.

Key examples of the encroachment of advertising include:

- The apparently accidental approval of the huge billboard advertising on the Canberra Centre, which contravenes existing regulations;¹⁴
- The contracting of Adshel to build and maintain new bus shelters across Canberra;
- The approval of ever more advertising on ACTION buses; and
- The stretching or direct contravention of existing regulations such as through parking trucks with advertising signage beside arterial roads, placing A-frame ads in pedestrian areas, etc.¹⁵

Particularly with the arrival of the Capital Metro light rail, which the Green Institute fully supports, this encroachment of advertising should be cause for concern.

3. Other jurisdictions' regulations

Term of reference 1(d)

The Green Institute strongly recommends that, rather than looking to other jurisdictions in Australia which have failed to control public space advertising and progressively lost their unique urban flavours, Canberra should be looking to jurisdictions overseas which have taken bold and popular steps to wind back or ban altogether public space advertising.

The most famous windback of public space advertising is that undertaken by the Brazilian city of Sao Paolo, through its "Lei Cidade Limpa", or Clean City Law, of 2006.¹⁶ This saw the removal of some 15,000 billboards across the city, and has proved very popular.¹⁷ Chennai, India, banned billboards in 2009,¹⁸ and, in 2014, the French city, Grenoble, under a Green mayor, followed suit, with a rollback of

¹⁴ Markus Mannheim, "Canberra Centre's huge ads 'unlawful' but no one checked", *Canberra Times*, July 23, 2014, <http://www.canberratimes.com.au/act-news/canberra-centres-huge-ads-unlawful-but-no-one-checked-20140717-ztz4p.html>

¹⁵ See, for example, images collected by Ian Mcauley at <http://www.ianmcauley.com/cras/cras.html>

¹⁶ https://en.wikipedia.org/wiki/Cidade_Limpa

¹⁷ <https://www.newdream.org/resources/sao-paolo-ad-ban>

¹⁸ <https://www.theguardian.com/cities/2015/aug/11/can-cities-kick-ads-ban-urban-billboards>



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billboard and other street advertising.¹⁹ Several states in the USA, including Hawaii, Maine and Vermont, have banned billboards, and Paris has reduced advertising space across the city by 30%.²⁰

Meanwhile, increasingly passionate groups of citizens are driving a range of initiatives to reclaim public space from advertising. One delightful project called CATS - the Citizens' Advertising Takeover Service - has crowdfunded buying out the ad space in London Underground stations, replacing the commercial messages with pictures of cats.²¹ Others are taking more radical steps, including civil disobedience, to rid their streets and public transport of advertising.²²

In this context, winding back Canberra's restrictions on advertising in public space is out of step with current global social trends.

4. Community views

Term of reference 2

Advertising is unpopular.

While a full survey of the Canberra population is beyond the remit and resources of this submission, there are reliable proxy figures we can use to demonstrate the broad unpopularity of advertising in general.

According to the most recent Grey's Advertising study,²³ 79% of Australians agree with the statement that there is too much advertising and 73% believe that advertising can't be trusted. Previous studies have found that 8 out of 10 Australians feel that advertising bombards them with useless information, two thirds think it is out of touch with economic realities and over 80% feel that it demonstrates an unrealistic depiction of Australia's homes and home life.

¹⁹ Rory Mulholland, "Grenoble to replace street advertising with trees and 'community spaces'", *The Telegraph*, November 24, 2014, <http://www.telegraph.co.uk/news/worldnews/europe/france/11250670/Grenoble-to-replace-street-advertising-with-trees-and-community-spaces.html>

²⁰ Arwa Mahdawi, "Can cities kick ads? Inside the global movement to ban urban billboards", *The Guardian*, August 12, 2015, <https://www.theguardian.com/cities/2015/aug/11/can-cities-kick-ads-ban-urban-billboards>

²¹ James Turner, *We Replaced 68 Tube Adverts with Cats. Here's why...*, September 12, 2016, <https://medium.com/on-advertising/why-we-just-replaced-68-tube-adverts-with-cat-pictures-9ed1ae1177d0>

²² No author, *Advertising Shits in Your Head*, Dog Section Press, 2017 https://issuu.com/dogsectionpress/docs/advertising_shits_in_your_head

²³ Grey, *Eye on Australia*, 2016, <http://www.eyonaustralia.com.au/>



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Another useful indicator is the widespread use of ad-blockers, by far the most popular browser add-ons. According to one study, 45% of Britons and 55% of Americans use ad-blockers on computers, mobiles and tablets.²⁴ While there are no figures for Australia, it is reasonable to assume a similar penetration rate.

Finally, a survey of the people of Sao Paulo after the local government introduced a ban on outdoor advertising found that 70% viewed the step as beneficial.²⁵

In the absence of clear evidence to the contrary, it should be assumed that Canberrans, who love our city's natural beauty, are at least as opposed to advertising as the average Australian.

5. Impact on business and community organisations

Term of reference 3(a)

Increased billboard advertising would most likely benefit large businesses who can afford regular and blanket advertising campaigns over small and medium sized businesses and community organisations. This is not a positive outcome for Canberra or the Canberra community.

In addition, the social impact of advertising discussed at 1.3 above will have a flow on impact on community organisations. Increased depression and interpersonal violence, set out by Tim Kasser as the effect of increased advertising, will put greater pressure on community organisations supporting mental health, victims of domestic violence, and more.

6. Potential to "enliven" urban areas

Term of reference 3(c)

The suggestion term of reference 3(c) that billboard advertising has the "potential to enliven urban areas" is utterly extraordinary and runs contrary to basic common sense, as well as clear evidence.

Advertising sends a powerful message to the community at large that public space is not their space anymore – it belongs to private interests to profit from. As such, far from enlivening urban areas, it deadens them.

Compared to the sensory bombardment from billboards and bus shelters and hoardings in a city like Sydney or Melbourne, our streetscapes are gentler, calmer, more human. Where Sydney's streets make the city a fully

²⁴ Shaun Austin and Nic Newman, *Attitudes to Sponsored and Branded Content (Native Advertising)*, Digital News Report 2015, <http://www.digitalnewsreport.org/essays/2015/attitudes-to-advertising/>.

²⁵ Referred to by the World Watch Institute here: <http://www.worldwatch.org/node/5338>



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commercialised, inherently competitive, entirely transactional zone where people are valued only as a target market, our ad-free spaces nurture a friendlier, more open, more public-spirited community, more connected to the stunning natural environment we're nestled in.

In addition, as noted in point 5 above, advertising is likely to damage small businesses whose continued survival is critical to lively urban areas. The more that small businesses struggle to compete with enormous shopping malls, which are the logical beneficiaries of increased advertising, the harder it will be to maintain lively local shopping strips as the heart of local urban areas.

7. Ways in which advertising could be regulated

Term of reference 4

The Green Institute submits that, for all the above reasons, advertising in Canberra should be regulated and restricted *further*, rather than allowed and enabled to increase. It is our submission in particular that:

- i. Billboard advertising remain prohibited across Canberra, with greater resourcing and priority given to enforcement of the prohibition;
- ii. Advertising on ACTION buses be immediately wound back, with particular emphasis on removal of full wrap advertising covering windows, which causes discomfort and inconvenience to passengers;
- iii. The contract with Adshel for advertising in bus shelters be cancelled, with this important public service provided by government instead of handed to private interests to profit from. If the contract cannot be cancelled, then advertising space in the shelters should be bought back by the government and filled with art by local artists;
- iv. A commitment be made that there will be no advertising on Capital Metro light rail, on the inside or outside of rolling stock, or in shelters at tram stops;
- v. Roadside coreflute signs be allowed only at or below the existing size limitation and only as notification for community events or activities; and
- vi. Truck-top advertising, parked by the sides of arterial roads, be prohibited, with fines heavy enough to properly disincentivise the behaviour.