



Arbenigwyr mewn Busnes
Experts in Business

15 November 2019
Janet Finch-Saunders AM
Chair
Petitions Committee
National Assembly for Wales
CF99 1NA

Dear Janet Finch-Saunders AM,

RE: Petition on Advertising Boards

FSB Wales welcomes the opportunity to contribute to the Petitions Committee's review of the petition regarding a potential ban on advertising boards.

FSB Wales is the authoritative voice of businesses in Wales, with around 10,000 members. It campaigns for a better social, political and economic environment in which to work and do business. With a strong grassroots structure, a Wales Policy Unit and dedicated Welsh staff to deal with Welsh institutions, media and politicians, FSB Wales makes its members' voices heard at the heart of the decision-making process.

Work FSB has done on banning Advertising Boards:

FSB Wales have not engaged in depth with members in Wales on this issue. However, our colleagues in Scotland responded to the City of Edinburgh Council's consultation on such a ban. As such, in this document we draw on our FSB Scotland colleagues' work on this issue. There is no reason to think that the issues raised in that consultation by SMEs and our members would be dramatically different to those that pertain in Wales, so we believe this to be useful evidence for the Petitions Committee.

Summary

The consultation in Edinburgh found that many local businesses are sympathetic to the goal of decluttering streets in order to make their areas more attractive and accessible, which is a goal that would have benefits for the businesses on a street as well as for the community.

Ff/T 029 2074 7406
E wales.policy@fsb.org.uk
W fsb.wales

C/A 1 Cleeve House,
Lambourne Crescent,
Caerdydd, CF14 5GP

Swyddfa Gofrestredig | Registered Office:
National Federation of Self Employed and Small Businesses Limited,
Sir Frank Whittle Way, Blackpool Business Park, Blackpool, FY4 2FE
Cofrestrwyd yn Lloegr Rhif | Registered in England: 1263540



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However, the nature of street clutter is varied. Examples cited by Edinburgh SMEs include:

- Street furniture
- Moveable waste and recycling bins
- Irresponsibly parked vehicles

If the main aim of this ban would be to lower the risk of injury, then any solutions must also take into account hazards such as defects on pavements and on roads.

Any serious policy to address these risks must take into account the general obstructions and risks, as well as the wider role of pedestrianisation of spaces. Ongoing work by Welsh Government on Active Travel and making accessible shared spaces, including the issues listed above seems a good holistic agenda within which to explore the issue of A boards within a wider strategic analysis.

In terms of how accessibility and connectivity fit into a general strategy for making attractive places and helping town centres become community hubs, our recent work on the future towns gives an overarching strategic view, which can be found here: <https://www.fsb.org.uk/docs/default-source/fsb-org-uk/tm-the-future-of-welsh-towns-report.pdf?sfvrsn=0>

Impact of a ban on Advertising Boards

In general, A boards are an investment by a business to serve a purpose, whether to attract customers to a location that is not immediately apparent; or in order to advertise a particular promotion.

The impact of A boards will therefore vary according to the nature of a business and its location. For example, a business for whom a ban would have a particularly impact may need advertising boards to attract customers to the upper floor of a building, a basement, or on a side street. Therefore, a retail business sited in such an area is more dependent on A Boards than would be a business with a substantial on street frontage. As such, A boards will tend to be valued by smaller businesses than large chains, although both make use of them.

In the FSB Scotland consultation on a ban in Edinburgh, many businesses stated that if there were a blanket ban on A Boards, it could lead to significant difficulty:



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"[A] ban could prove a significant blow to many struggling small businesses throughout Edinburgh." – FSB Member

"This will have a detrimental effect on small shops, cafes and galleries." – FSB Member

"The ban on A-boards would I am sure be the final nail in many small business's coffin." – FSB Member

"It is tough as hell having a business in a basement - customers can't find you, don't notice you and don't look down at your shop when they are walking along the road. My A-board brings me ALL the footfall that I get. Customers constantly tell me they only noticed us because they saw our sign." – FSB Member

So a narrow focus on A Boards not only does not take into account the other issues cited above of other obstructions and defective paving etc., but would also have an uneven impact with the more vulnerable SME sector being impacted the most.

Evidence and Text of Petition

The following paragraph requires evidence to justify a blanket ban.

'This is especially an issue on shared spaces such as city centres as well as coastal towns where the pavements are narrower.'

The different effects on areas due to (for example) the level of pedestrianisation, needs to be understood before a blanket ban that would have a particular effect on smaller businesses be enacted, and may have uneven impact in different types of places. As such, engagement with SMEs in local areas, to provide evidence and understanding of different places and the impact this issue has is important.

What can be done

It is important to note that small businesses are often aware of the issues of obstructions, and use A boards responsibly. As such, businesses in general in the Edinburgh survey had a balanced approach.



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“I am against unnecessary A boards on the street as I agree that streets are too cluttered... I do however, feel that some businesses do need and benefit from an A board – namely those situated off the main road, or upstairs, where there is no opportunity to show clearly that the business is there or what the business offers.” – FSB Member

“The use of A boards should not inconvenience free movement by pedestrians but should be proportionate to pavement width. Therefore a blanket ban would have a detrimental effect but some compromise on maximum size would seem reasonable.” – FSB Member

“One of the few ways we can advertise our products and services to passers-by, is via our small A-board... We always ensure that our signage is placed with our guests' (and potential guests') ease, safety and accessibility in mind.” – FSB Member

It would be a shame to penalise responsible businesses who are aware of the issues, and do not create obstructions with their A boards, which are necessary to their business. A better approach than a blanket ban would be engagement with businesses on how they use A boards, and what can be done to ensure they are used in a more considerate manner.

Our understanding that one of the problems for RNIB is that A boards are by their nature mobile and can be placed in different positions every day, or through being blown into different positions by the wind. As such, consistent and secure positioning would allay some problems. Such an approach would require engagement with businesses.

Moreover, were there to be a ban there is a question of enforcement– for many responsible SMEs, facing greater regulatory burden is more frustrating when unscrupulous businesses operate without regard to the rules.

Our Recommendations:

- Place the A boards issue within a wider strategic understanding of access, connectivity, particularly in relation to town and city centres as linked to town planning and active travel. This should include the wider issues of obstruction and quality of pedestrianised spaces, and how A boards can fit within such an agenda.



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- Engage with business in local areas, to gain understanding of how, where and why A boards are used.
- Consider providing clear guidance for business use of A boards in different types of areas, based on evidence from the above.
- Explore alternatives to a blanket ban through the engagement process – for example, a maximum size, a set space required on pavements, and so on.
- Ensure fair and consistent enforcement on any proposals.
- An audit on the uses of A boards by businesses in different settings, and the impact of A boards on pedestrians, and particularly on disabled people, taking into account other issues such as quality of paving, other obstructions, behaviours and risks.

I hope this perspective is of interest to the committee as it looks into the potential impact of a ban on advertising boards in Wales.

Yours sincerely,

Ben Francis
Wales Policy Chair
Federation of Small Businesses Wales