



# Briefing Note: **car advertising, car ownership and public transport use in England and London**

November 2022



## **Introduction**

'Badvertising' is a campaign to stop adverts fuelling the climate emergency. This includes ads for cars, airline flights and fossil fuels. We ended tobacco advertising when we understood the harm done by smoking. Now we know the damage done by fossil fuel products and activities, it's time to stop promoting them.

The campaign is organised by the [New Weather Institute](#) think tank and kindly funded by the [KR Foundation](#). It is delivered in partnership with climate charity [Possible](#) and the [Adfree Cities](#) network.

Badvertising is targeting national legislation to curb high carbon advertising, as well as the advertising policies of media outlets and local and regional public bodies with commitments to tackle the climate crisis.

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## Public transport and high carbon advertising

In the UK, a high proportion of the out-of-home advertising estate is located on our public transport networks, e.g. bus stops, railway stations and tube stations. These networks are democratically accountable via a range of avenues: the railways, through Network Rail; the tube, DLR, Overground and London buses through Transport for London; and the bus, tram and metro networks in and around our other major cities via their respective Passenger Transport Executives. Each of these bodies maintain advertising policies and/or 'codes of acceptance' which govern the types of adverts which are considered acceptable to host on their networks.

### Network Rail

Network Rail are the public body responsible for managing the rail infrastructure for the whole of England, Wales and Scotland, including the 20 busiest railway stations, and thus administer one of the largest advertising estates in the UK<sup>1</sup>. Unfortunately, NR have refused to disclose their net advertising revenue on the grounds that this is commercially sensitive<sup>2</sup>.

Network Rail's environmental sustainability strategy features six strategic priorities to support decarbonisation<sup>3</sup>, including the acceleration of "modal shift to public and active transport": *"As well as reducing our own emissions we can also encourage passengers and freight away from more carbon-intensive methods of travel like road and air onto the railway"*.

In September 2022 Badvertising wrote to Network Rail to ask them to adopt a low carbon advertising policy which specifically excludes ads from fossil fuels, fossil-powered motor vehicles and airlines<sup>4</sup>. The company responded some days later<sup>5</sup>, setting out why they did not plan to change their advertising Code of Acceptance<sup>6</sup>.

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<https://www.networkrail.co.uk/industry-and-commercial/network-rail-property/advertising-on-our-property/>

<sup>2</sup> Network Rail FOI2022/00869

[https://drive.google.com/file/d/1ScgePlq79qW0pDF\\_ICqPhg5jW5qid0Wy/view?usp=sharing](https://drive.google.com/file/d/1ScgePlq79qW0pDF_ICqPhg5jW5qid0Wy/view?usp=sharing)

<sup>3</sup> Network Rail Environmental Sustainability Strategy 2020-2050

<https://www.networkrail.co.uk/wp-content/uploads/2020/09/NR-Environmental-Strategy-FINAL-web.pdf>

<sup>4</sup> <https://www.badverts.org/latest/letter-a-low-carbon-advertising-policy-for-network-rail>

<sup>5</sup> <https://drive.google.com/file/d/1jN7rghv6muMPfZVcGyLfkFLwiX2V-2IJ/view?usp=sharing>

<sup>6</sup> <https://www.jcdecaux.co.uk/download/file/394>

## Transport for London

Transport for London (TfL) reports that it owns 40% of London's outdoor advertising by value, generating over £150m per annum from advertising prior to the Covid-19 pandemic<sup>7</sup>. TfL states on its website that it is "[H]ome to one of the world's most valuable advertising estates"<sup>8</sup>. In comparison with Network Rail, TfL takes a more active and transparent approach to managing their advertising estate. TfL's Advertising Steering Committee oversees the publication of annual Advertising Reports and maintains an Advertising Policy that also specifically seeks to ensure that its code of acceptance is aligned with the Mayor of London's public policy goals<sup>9</sup>.

In 2019, to reflect the requirements of the Mayor's London Food Strategy<sup>10</sup> TfL amended its Advertising Policy to prohibit ads for what are commonly known as 'junk food' products, i.e. 'food or non-alcoholic drinks which are high in fat, salt and/or sugar ('HFSS' products). TfL also refuses ads from countries which have the death penalty for same-sex sexual acts.

TfL's Sustainability Report 2021 states that as "London's strategic transport authority", they are "committed to help realise the environmental outcomes of the Mayor's Transport Strategy and the transport elements of the London Environmental Strategy":

*"Transport is responsible for a quarter of London's carbon emissions, with private car use the primary source of these. Therefore, we have a vital role in increasing the proportion of journeys that can be made by walking, cycling and public transport, which is why we have a target of 80 percent of trips in London to be made by these methods by 2041."<sup>11</sup>*

TfL's Advertising Reports gives a breakdown of the number of advertisements by market sector. In July 2022, we requested a list of all advertisers for 2018/19 and 2021/22 in the Motors and Travel & Transport categories. The list TfL provided shows that these are predominantly adverts for cars and flights. After removing companies in these sectors selling low carbon products or services (e.g. car-sharing apps or UK rail holidays), we estimate that around 4% of TfL's

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<sup>7</sup> <https://content.tfl.gov.uk/tfl-advertising-report-1718.pdf> following a dip in advertising revenue during the Covid-19 pandemic to just £50m, estimated revenues for 2022/23 are projected to have recovered to £122.2m <https://www.london.gov.uk/questions/2022/0275>

<sup>8</sup> <https://tfl.gov.uk/info-for/business-and-advertisers/advertising>

<sup>9</sup> <https://content.tfl.gov.uk/tfl-advertising-policy-250219.pdf>

<sup>10</sup> <https://content.tfl.gov.uk/tfl-advertising-annual-report-2-july-2021-acc.pdf>

<sup>11</sup> <https://content.tfl.gov.uk/tfl-sustainability-report-29-september-2021-acc.pdf>

advertising revenue is derived from adverts for high-carbon transport goods and services, while cars ads accounted for just 0.48%<sup>12</sup>. As set out in Figure 1, advertising revenues account for around 2.8% of TfL's overall gross revenues in a normal year, so ads for high carbon transport goods and services are generating around 0.1% of total TfL revenues – with car ads specifically bringing in just 0.01%.

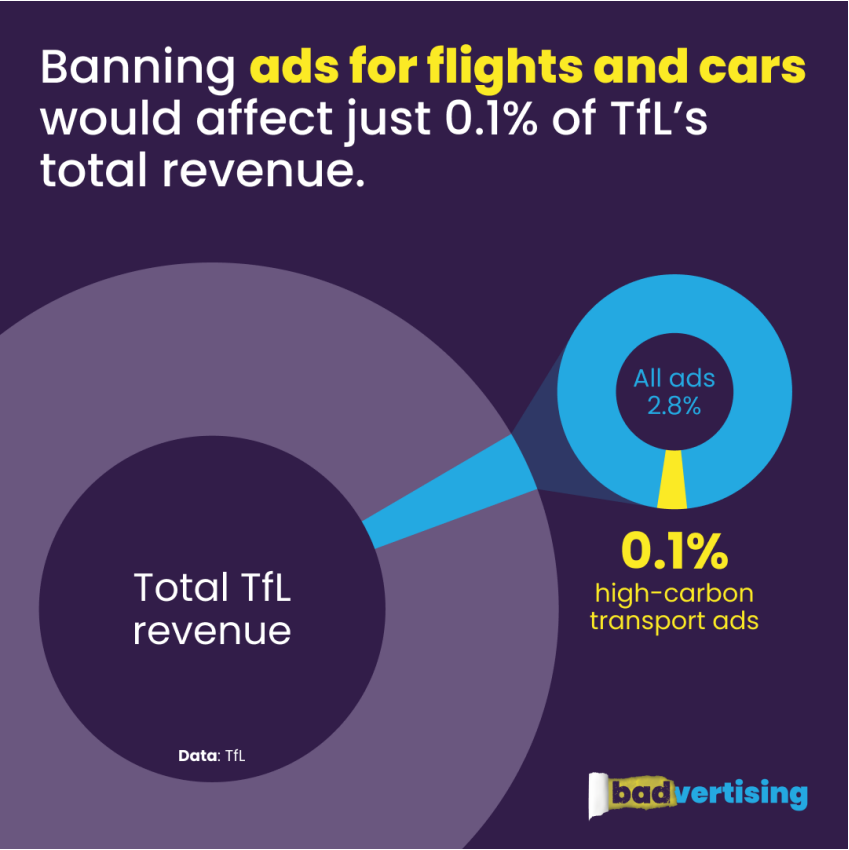


Figure 1: Estimated share of TfL advertising revenue derived from high carbon transport goods and services and cars specifically.

<sup>12</sup> Sources and calculations available here: <https://docs.google.com/spreadsheets/d/1MNTPHKEG3-yLsZIZ0SP5-fXUHPej0iPu2QId-IK8rNM/edit#gid=620863139>

## Car ownership vs rail travel: England

The National Travel Survey is a household survey run by the Department for Transport that is designed to monitor long-term trends in personal travel and to inform the development of policy<sup>13</sup>. It is the primary source of official data on personal travel patterns by residents of England within Great Britain.

Our analysis of NTS data aggregated across the years 2014-2019 and broken down by income group shows clearly that the more cars present in a household, the fewer train journeys its members make each year<sup>14</sup>.

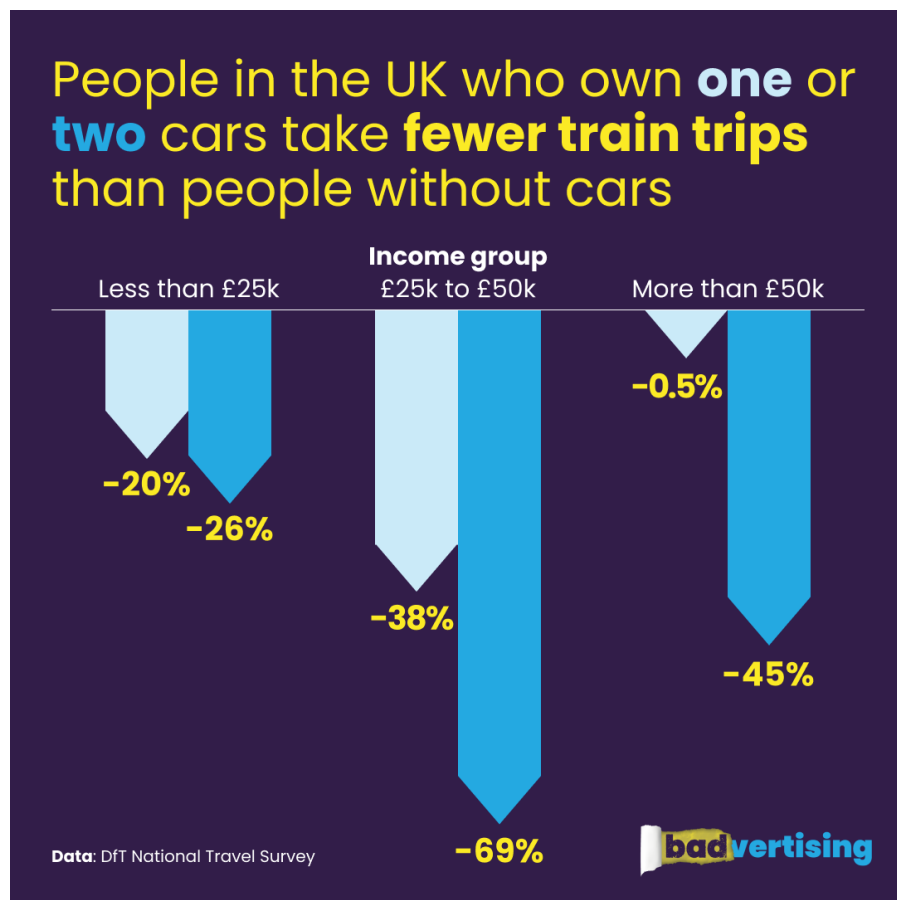


Figure 2: Reduction in annual train journeys taken by English drivers compared to non-drivers, by income.

<sup>13</sup> <https://www.gov.uk/government/collections/national-travel-survey-statistics>

<sup>14</sup> Breakdown [available here](#).

## Car ownership vs public transport use: London

Each year, TfL randomly selects a sample of 8,000 households in London to be interviewed about their travel habits as part of the London Travel Demand Survey (LTDS)<sup>15</sup>. The LTDS records detailed information on the number of trips Londoners make by different modes. Our analysis of the 2018/19 LTDS data shows clearly that (for all income groups except the lowest), the more cars present in a household, the fewer trips they make by public transport.

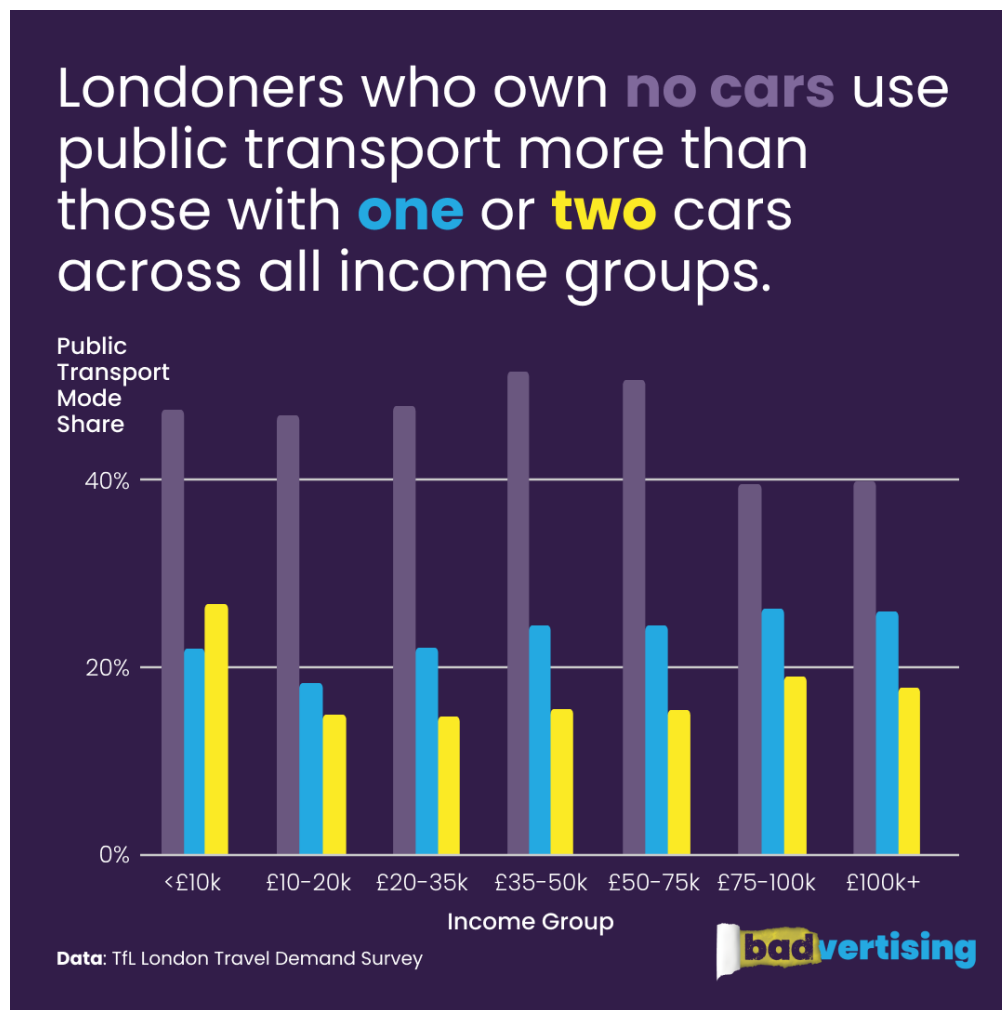


Figure 3: Public transport mode share in journeys taken by London residents, by income and number of cars in household

<sup>15</sup>

<https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/consultations-and-surveys>

## Conclusion & recommendations

Badvertising is calling for Network Rail, TfL and other Passenger Transport Executives across the UK to adopt new low carbon advertising policies which would exclude ads for fossil fuels, flights and polluting cars from appearing on their estates. Both Network Rail and TfL have specific policy commitments around supporting a modal shift from road to rail, and in TfL's case, its decision to amend their Advertising Policy to align with the Mayor's Food Strategy<sup>16</sup> gives rise to the obvious implication that they should also amend the policy to align with the requirements of the Mayor's Transport Strategy<sup>17</sup>.

However, our analysis here demonstrates that both organisations' existing codes of acceptance already contain sufficient grounds to preclude them from carrying ads for cars specifically. Academic research commissioned by the Badvertising campaign demonstrates that car ads (specifically, SUV ads) are highly effective at persuading consumers to purchase them<sup>18</sup>.

Network Rail's code of acceptance lists grounds for refusal of ads which include the following clause:

in the reasonable opinion of Network Rail, it might adversely affect the interests of Network Rail in any way;

Similarly, TfL's current Advertising Policy lists grounds for refusal of ads which include the following clause:

(m) it may adversely affect in any way the interests of the site owner, TfL or any member of the GLA Group;

Network Rail and TfL's financial interests both rely on revenue (including advertising revenue) which is ultimately derived from passenger travel on their networks. Advertising cars to public transport passengers demonstrably undermines these revenue streams, since both NTS and TfL data show clearly that higher household car ownership levels are associated with correspondingly lower levels of rail travel and overall public transport use.

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<sup>16</sup> <https://www.london.gov.uk/what-we-do/communities/food/london-food-strategy-0>

<sup>17</sup> <https://tfl.gov.uk/corporate/about-tfl/the-mayors-transport-strategy>

<sup>18</sup> Kasser et al. SUV Advertising and demand for SUVs, Dec 2021, [https://static1.squarespace.com/static/5ebd0080238e863d04911b51/t/61afb58d8288363328e3f8f9/1638905230408/Advertising+and+demand+for+SUVs\\_Kasser+et+al.Badvertising+2021.pdf](https://static1.squarespace.com/static/5ebd0080238e863d04911b51/t/61afb58d8288363328e3f8f9/1638905230408/Advertising+and+demand+for+SUVs_Kasser+et+al.Badvertising+2021.pdf)

The evidence presented in this briefing note highlights the adverse effects of car advertising on the interests of public transport authorities and provides grounds for car ads to be rejected under the existing codes of acceptance which Network Rail and TfL already apply to advertising on their estates. This measure should be implemented with immediate effect, in advance of more substantive changes to codes of acceptance to explicitly reflect climate goals.