



**CAMPAIGN** *for*  
**REGIONAL**  
**BROADCASTING**

**Midlands**  
*Midlands*

...AS NOT SEEN  
ON TV

ON LA  
...AS NOT SEEN



**A response to the Ofcom consultation:  
Holding the BBC to account for the delivery of  
its mission and public purposes**

**From the Campaign for Regional Broadcasting Midlands**

Prepared July 2017.



## Introduction:

The Campaign for Regional Broadcasting Midlands is a grassroots campaign that aims to promote the Midlands as a place to create and make television, radio & film. Since the late 1990s, there has been a gradual migration of programme making out of the region by the BBC and ITV, and as a result, this important, diverse and highly populated region is now virtually absent from the airwaves.

We are a loose coalition of various industry professionals, crafts people and licence fee payers. With a committee of 10 people and a supporters list of 2,500 people, we have campaigned within the BBC, with local politicians, local newspapers and via social media. Our aim is to raise the profile of the Midlands region within a London bound broadcasting establishment. Our case is an economic one and we have presented sound financial data to support our argument.

Any claims made about increases in “out of M25” production quotas, sound incredibly hollow from here. There is a case to be made for fairer treatment for Midlands viewers and listeners; who after all, make the same financial contributions to the BBC via the licence fee. We believe that this region does not see an equitable return, either financially or in its representation when compared to the Capital city, to the north of England or the nations. Further, we believe that the wider economy of the Midlands is being affected by the decline of the broadcasting sector within it.

This Campaign is not looking for financial subsidies from the BBC or from HM Government; we just want to see a fair and equal proportion of the public money that is raised by the Corporation from the Midlands – being returned and spent in the region, and to see much greater representation of it. We also believe that the same principle should apply to all nations and regions (and not to just one or two, seemingly favoured areas).

**We welcome the opportunity to take part in this Ofcom consultation. We have read the consultation document with great interest, and we are heartened by the approach and the proposals that are outlined within it. There are some parts of the proposals that we consider need some strengthening, with respect to regional representation and BBC spending. However, for the most part we agree with Ofcom’s approach to the regulation and monitoring of the BBC.**



## Our Responses

### Questions about the operating licence

#### Q.1 Do you agree with our overall approach to setting the operating licence?

Yes, in general, we agree with the Ofcom approach to setting of the operating licence.

We note that a common theme and requirement of Ofcom is to secure more distinctive output and services, and this is something that we also consider to be fundamental, not only for viewers and listeners, but for continued support and existence of the BBC itself.

We think that distinctiveness would require the BBC to explore and source programming from right across the United Kingdom, and to be bolder in its development of ideas, to stray beyond its comfort zones in terms of locations and production centres.

For instance, we think that drama should appeal to a wider cross section of licence fee payers and that Ofcom's commitment to diversity (or for that matter, the BBC's commitment as outlined in its recently published Annual Plan 2017 / 2018) would require the BBC to discover new talent, formats and stories that tackle contemporary life from across all the nations and regions.

**For the BBC to justify its current funding model – via a publicly paid licence fee from households across the UK – then it must be seen to produce its content from a wider variety of locations.**

There must be a greater local relevance and engagement by the BBC in the nations and regions. The recently published BBC Annual Plan seems to recognise this principle as far as the nations are concerned, but we are not convinced that the BBC has adopted the right (or equitable) approach to the English regions. We will come back to this in our response to other questions in this document.

In short, we agree with the Ofcom approach overall, especially with the requirement for the BBC to provide programming content that is distinctive; we hope that Ofcom will be able to monitor and measure BBC output in this regard.



**Public purpose 1: to provide impartial news and information to help people understand and engage with the world around them**

**Q.2 Do you agree with the approach we have proposed for public purpose 1, including the high-level objectives and regulatory conditions we are proposing?**

Yes, in general, we agree with the Ofcom approach to public purpose 1.

We note that most of the targets that are set are largely quantitative, and we appreciate that these are easier to measure.

News is an essential element of the BBC. For the most part, the BBC sets the bar for its impartiality and its ability to get to the heart of the matter. This important element of the BBC approach and its output, might be one its most under-rated achievements. We believe the contribution that the BBC makes in this regard should not be under estimated or taken for granted. Certainly, the BBC enjoys much success in its news output, and this can be seen in the ratings, for both BBC national news and its local news programmes.

**One concern though, is that there has been a gradual reduction of regional output over many years. Therefore, we welcome the Ofcom requirement to maintain regional output.**

From a qualitative perspective, we suggest that the BBC should enable some output to be originated and produced entirely in a region or nation. There has been a move towards homogeny in style of production, such as the local news opt outs and programmes such as *Inside Out* or *Sunday Politics*. Whilst this may lead to uniformity and parity in the way the regions are served, it can also stifle output that would otherwise have a stronger local flavour and resonance.

We would like to see the development of a strand of truly local news programming that is entirely produced in the nations and English regions. This may have a more magazine style, and it could also enable younger journalists to make and produce programmes that are relevant or closer to their communities.

This freedom would result in three major benefits for the BBC:

1. It could improve coverage of diverse communities.
2. It could uncover stories that previously went undiscovered (and which occasionally might have a national relevance).
3. It would help develop and enable local journalistic and programme making talent to produce formats that could be transferred elsewhere.



**Public purpose 2: to support learning for people of all ages**

**Q.3 Do you agree with the approach we have proposed for public purpose 2, including the high-level objectives and regulatory conditions we are proposing?**

Yes, in general, we agree with the Ofcom approach to public purpose 2.

This is another area of BBC output that is widely regarded, both at home and abroad.

We agree with the Ofcom requirement to retain existing quotas or to increase them where appropriate.

We agree that children's programming is important and that the BBC continues to lead in this area, and we welcome the recent announcement by the BBC to increase its investment in this area. We would suggest that the BBC should return some children's programming to one of its mainstream channels, especially in the after-school period of 16.00 to 18.00. We are concerned that ratings for children's output has declined considerably and this does not auger well for the BBC. The affection that many of us have for the BBC is rooted in our childhood memory of enjoying its children's programmes many decades ago! We are concerned that this affection will not be passed on quite so easily to current and future generations. One way to arrest this, would be to pass control of a major network (with a prominent position in the electronic programme guide) for at least 2 hours each day (and at weekends, say Saturday and Sunday morning) to enable a showcase for programmes that are available on the BBC's children's channels or online.

We would also like the BBC to increase its programme making investment in natural history. This is a genre that the BBC enjoys a worldwide reputation for, with programmes that are highly appreciated by viewers at home (with correspondingly high ratings). We are not entirely sure why there have been cutbacks in this area over recent years: there is certainly no obvious logic that we can discern, except to save money.

**We believe that learning genres should be spread around regional centres of the BBC. Manchester is the home for the BBC children's channels and Bristol the home for natural history. We believe that other BBC regional centres could be invigorated by becoming a base for arts, music, religion, science, business and history. This would help ensure that BBC output has a strong regional output and perspective, whilst ensuring the regional relevance of the BBC that we argue for, in our response to Question 1 above.**



**Public purpose 3: to show the most creative, highest quality and distinctive output and services**

**Q.4 Do you agree with the approach we have proposed for public purpose 3, including the high-level objectives and regulatory conditions we are proposing?**

Yes, in general, we agree with the Ofcom approach to public purpose 2.

We read this section of the Ofcom consultation paper and found ourselves agreeing with all the points that were made. We agree that distinctive output is key to what makes the BBC relevant and different. It is also key to the concept of a licence fee, and therefore for the BBC's very existence.

In addition, we agree that measuring distinctiveness is complex, although we welcome some of the objectives that have been suggested. We think that measures can be put in place regarding the mix of genres, quality, original production, risk taking, innovation and the range of audiences. These are perhaps even more important than a simple programme rating, as we believe that more emphasis needs to be placed on the BBC's appeal to wide cross section of licence fee payers.

We are concerned that in some of its output, the BBC is somewhat risk averse, and tends to stick to a tried and trusted formula.

This can be seen in BBC drama output, although this criticism could also be levelled at the other public service broadcasters. We note that there is far more drama that is set in the north of England than there is any other region. Even in this respect, it is not the whole of the north of England that is featured, rather a narrow belt that spans only one or two cities. Such drama uses identical locations, and draws upon a small body of writers, producers and actors. This is not to say that the end-product is not finely crafted or entertaining, but it does lead to a familiarity and reiteration of story lines and themes.

Such programmes are highly rated by today's standards, delivering 5 or 6 million viewers, but we are concerned that in their similarity they have limited appeal, and that the same 5 or 6 million people now form a core audience for much of BBC drama's output. If correct, then the individual programmes may have a high rating, but the core audience represents only a small proportion of all licence fee payers. Also, we are not sure that this same core audience is either young or diverse, and we fear that it will continue to contract over time.

We agree with Ofcom that the BBC should contribute to the creative economies of the UK through its continued investment in originated content. We also strongly agree with the statement that the BBC should commission output from a wide range of independent producers to ensure a range of voices are ideas are reflected across its services. This would presumably include forays that we do not currently see, such as drama being commissioned from writers and producers in the north east, or the Midlands, or the east of England.

**We strongly agree with the setting of minimum levels of first-run UK originations, but we would also like to see a firmer requirement for production from more parts of the UK than we currently see. We will explore this concern in more detail in our answer to question 4.**



**Public purpose 4: to reflect, represent and serve the diverse communities of all the UK's nations and regions**

**Q.5 Do you agree with the approach we have proposed for public purpose 4, including the high-level objectives and regulatory conditions we are proposing?**

This is the chapter within the Ofcom consultation document that is most concerned with the aims and scope of our Campaign. There are many concerns that we have about how the BBC approaches its nations and regions purpose. We are heartened by some of the proposals that Ofcom are suggesting, but we feel that they can be strengthened. We will try and keep this answer short:

The BBC seems to struggle when it comes to this public purpose. It has invested heavily in recent years by moving large portions of its operation to Salford, whilst at the same time, it has considerably reduced its programme making presence in Birmingham. A case of giving to a regional Paul with one hand, but taking from a regional Peter with the other.

The East & West Midlands are home to 16% of the UK population and 19% of England's. Therefore, they contribute 16% of the BBC's total licence fee income.

Further, the BBC's Midlands region includes the East of England and constitutes one of its 7 management areas (the others are: Scotland, Wales, Northern Ireland; the South of England, the North of England and London). Using their definition, the BBC Midlands region contains its largest group of licence fee payers with 25% of the UK population, who contribute some £1 billion - each and every year - to BBC revenue.

Yet, according to the BBC Annual Report 2015, **only 1.8% of BBC network television spend is in the Midlands.**

So, to reiterate: 25% of the UK population, contributes £1 billion in licence fee income and only received 1.8% of network TV spend in 2015. How does this translate in representation?

Using the same year as a basis for our research, we have established that the Midlands is not being represented by the BBC in peak time output on any of its television channels, neither on most of its radio channels. See charts on the following pages.

There have been no significant changes to programme production or commissions in the region since 2015, so we can assume that Midlands' "representation" remains the same in 2017 as it did in 2015.

We have raised this with the BBC (and previously with the BBC Trust) on many occasions. There has been some attempt to improve the BBC presence in the region: the BBC training academy was moved, in part, to Birmingham in 2016, as was the BBC pensions department. We are also pleased to report that BBC 3 will move to Birmingham in 2018. However, none of these developments will improve the representation of the Midlands by the BBC on any of its main television or radio channels.



We consider the lack of the Midlands and East of England production on BBC channels to be truly appalling, especially considering these areas contain one quarter of the total UK population / licence fee payers.

**Radio:**

| BBC Radio Network       | Produced in Midlands 2014 / 2015  |
|-------------------------|---|
| Radio 1 / Radio 1 Xtra  | 0%  |
| Radio 2                 | 0%  |
| Radio 3                 | 0%  |
| Radio 4 / Radio 4 Extra | <i>The Archers</i> (drama) - 64 hours per annum<br><i>Home Front</i> (drama) - 26 hours per annum<br>With repeats, approx. 2.7% of Radio 4 annual broadcast hours |
| Radio 5                 | 0%  |
| Radio 6 Music           | 0%  |
| Asian Network           | Estimated 30% or less (and decreasing)  |

**Television:**

| BBC TV Network    | Produced in Midlands 2014 / 2015                                |
|-------------------|---|
| BBC1 daytime      | Daytime drama - 130 hours approx.<br>5.5% of BBC1 daytime hours |
| BBC1 peak-time    | 0%  |
| BBC2              | 0%  |
| BBC3              | 0%  |
| BBC4              | 0%  |
| BBC News channel  | 0%  |
| CBeebies and CBBC | 0%  |





We are not convinced that the conditions proposed by Ofcom for the BBC that relate to the proportion of expenditure, or the genres of programmes made “outside of the M25” are specific enough.

Any mention of “out of M25” quotas sound incredibly hollow from the Midlands.

The term seems to suggest that there are two parts of the United Kingdom: London and not-London. This demarcation of the UK is simplistic. It denies the individuality of each of the nations, and not least, the plurality of the English regions.

England contains some 55 million people, out of a total UK population of 65 million. Its regions cannot be described as “out of M25”. It cannot either, be divided between a north and a south.

We prefer to use the regional definitions that are already in use, both by the UK national government and by the EU. These are the NUTS1 regions (Nomenclature of Territorial Units for Statistics) which divide England into 9 regions (London plus 8 more). Additionally, Scotland, Wales and Northern Ireland represents one NUTS1 area each, hence there are 12 in the United Kingdom. Variations on this system have existed in the UK since the 1930s and 1940s, although the current system is more recent. The NUTS1 regions are used by central government for strategic planning and by the EU when allocating regional funds.

In short, if this system is considered fair and adequate when it comes to government planning, analysis and allocation of expenditure for the population at large, then it must also represent a fair and adequate starting point for us to analyse BBC revenue and expenditure.

| <b>NUTS1 area</b>  | <b>Population</b>  | <b>Share of UK population (rounded)</b> |
|--------------------|--------------------|---|
| South East         | 9,026,297          | 14%                                     |
| London             | 8,787,892          | 13%                                     |
| North West         | 7,219,623          | 11%                                     |
| East               | 6,130,542          | 9%                                      |
| West Midlands      | 5,800,734          | 9%                                      |
| South West         | 5,515,953          | 8%                                      |
| Yorkshire & Humber | 5,425,741          | 8%                                      |
| Scotland           | 5,404,700          | 8%                                      |
| East Midlands      | 4,724,437          | 7%                                      |
| Wales              | 3,113,150          | 5%                                      |
| North East         | 2,636,848          | 4%                                      |
| Northern Ireland   | 1,862,137          | 3%                                      |
| <b>TOTAL</b>       | <b>65, 648,054</b> |   |

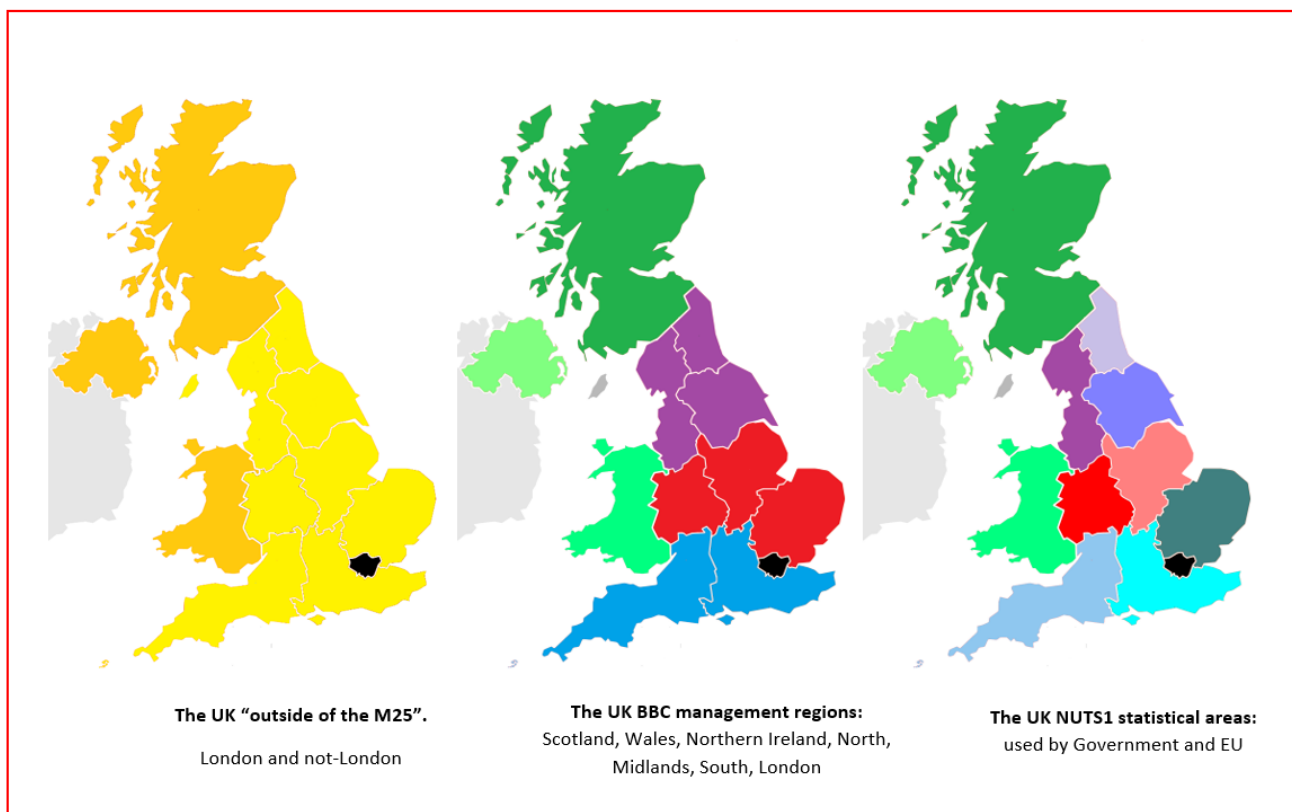
*The above table illustrates the share of UK population, using the mid-2016 population estimate, recently released by ONS.*

We note that Ofcom proposes to use a proportionality principle regarding BBC expenditure in the nations. We firmly agree. However, we also believe that Ofcom should consider using at least some degree of proportionality when monitoring BBC expenditure in the English regions.



We realise that there will always be a greater share of BBC expenditure in London (and in the cities where it has its main production centres) but we do not believe that the current disparity needs to be as disproportionate as it currently is.

**We also realise that an arbitrary approach to spending share, across the English regions, may not be possible or even desirable. What we are saying, is that there needs to be far more equitable distribution than we currently see. We fear that the BBC has become disengaged from many of its licence fee payers, by concentrating so much of its production (and the content of its programmes) on so few English regional cities.**



**At the very least, BBC spending should be more equally divided between its own, existing management regions. This would benefit the Midlands and East of England greatly, and would protect expenditure in the north of England and Bristol / the South West.**

Further, an additional metric would be to analyse BBC representation of the NUTS1 regions that are contained within its own English management regions. We think there should be fairer, quantifiable representation of each of the NUTS1 English regions, not just of Bristol, or Manchester (or Birmingham for that matter).



Regarding the nations: Scotland, Wales and Northern Ireland have a combined population that is slightly less than that of the East & West Midlands. Their broadcasting landscapes are healthier, but still more needs to be done to serve their audiences better and to represent them more, at a UK national level. We have always felt that new thinking and a greater share of programme making expenditure are needed. We were delighted to read in the BBC plan 2017 / 2018 (published 4<sup>th</sup> July 2017) that expenditure is to be increased significantly in the nations.

We have previously argued against the “lift & shift” approach (that has seen production lifted from London to the nations, to meet quotas). Again, we were delighted to learn that the BBC intends to move some commissioning to the nations. This should lead to a higher quality of representation to UK audiences.

We also believe that regional commissioning in the English regions would improve representation, and would introduce some internal competition within the BBC, leading to fresh creativeness and ideas generation.

Finally, we advocate a more federal BBC. We would like to see more regional commissioning, rather than the heavy decision making that we currently see from London. Regional programme commissioning in the past was a very successful model for the BBC, evidenced by **Countryfile** (the most highly rated factual programme on BBC1) and **Top Gear** (the most highly rated programme on BBC2) - both originally commissioned and made by BBC Birmingham.

The point here is that the regions have in the past, and continue to have in the present, a positive impact on the schedules. There seems to be a fascination amongst the viewing public with the many parts of the United Kingdom. We support any attempt by Ofcom to improve the monitoring of this public purpose requirement.

We welcome the Ofcom review of PSB regional production, scheduled to take place in 2017/18.



## Question about setting and amending the operating licence

### Q.6 Do you agree with Ofcom's approach to how we will set and amend the operating licence, as set out in Annex 5?

Yes, in general, we agree with the Ofcom approach to how it will set and amend the operating licence.

Our real concern, as outlined elsewhere, is that a robust approach is taken to regional programme production right across the nations and English regions. In addition, we would like to see a more equitable approach taken by the BBC, as to where it spends licence fee payers' money. This should be included in the operating licence requirements.

## Questions about performance measures

### Q.7 Do you agree with our proposed overall approach to performance measurement?

And

### Q.8 Do you agree with the proposed framework of: availability; consumption; impact; contextual factors?

And

## Question about the operating framework for the performance measures

### Q.9 Do you agree with Ofcom's approach to how we will set and amend the performance measures?

With regard to performance measurement, we largely agree with the Ofcom proposals and metrics that have been provided for the public purposes. We agree with the comprehensive quota sets that Ofcom have outlined in their consultation document. We fully support this robust approach to monitoring of BBC output.

**However, we believe that the BBC should report on the number of hours of programmes that it makes (or commissions from independents) in each of its 7 management regions. This in turn, should be broken down by each of the 12 NUTS1 regions. This would contribute to much greater transparency for the BBC board, Ofcom and for licence fee payers.**

Regional output figures were a key element of BBC reporting for many years (since its creation) but these seem to have disappeared from public view. We would like to see these figures reinstated, both in terms of hours of content produced, and in terms of regional expenditure. We believe that these metrics would help drive change, within the BBC.



## About the campaign

The Campaign was launched in 2013, following the announcement by the BBC that it was to transfer the Factual Unit from the Midlands: this was the last remaining production department for BBC network television at The Mailbox studios in Birmingham and the culmination of a long line of departmental and programming cuts, made in the region over the previous 14 years. In addition, what little was left of network radio production (including the agricultural unit) was also transferred out of the region, with the sole exception of *The Archers*.

ITV had already closed its main network production centre in Birmingham in 1999 (replaced with a regional news studio). Almost immediately, the Midlands ceased to be a primary production location for the network in any genre of programme making.

The net result of all these cutbacks is that the Midlands is the most under-represented region as far as programme making is concerned. It is the region that sees the lowest investment and programme making expenditure. This is evidenced any night of the week by its virtual absence in any of the schedules by any of the PSB broadcasters. Programme Commissioners are distant, as are senior executives and it seems that one of the largest swathes of viewers and listeners - their lives and their voices - are being ignored or overlooked.

[www.crbmidlands.org.uk](http://www.crbmidlands.org.uk)

[enquiries@crbmidlands.org.uk](mailto:enquiries@crbmidlands.org.uk)