



David Lloyd Media Services

A RESPONSE TO CONSULTATION

Draft operating licence for the BBC's UK Public Services **(BBC local radio provisions)**

“The voice still has it. The voice that speaks to you when you are lonely and have no friends. Few neighbours. Sitting in an apartment...but want to feel part of the part of the place they were born or brought up - the voice of a local radio person is the most powerful thing on Earth .“

(Michael Barton, former Controller BBC local radio 1975-1988 -'Radiomoments Conversations Interview, June 2017))

SUMMARY

The draft Ofcom licence proposes operating provisions for BBC local radio which appears less demanding than for any other BBC radio network.

The licence appears to attach little value to the needs of its enormous audience, approaching the size of Radio 1's in England.

BBC local radio does not attract a huge audience in big cities, such as London, and therefore its value and significance appears not to be acknowledged by decision-makers in the capital.

Whilst the radio market will address many demographics and formats, the 50+ demographic cannot be well-served by the commercial sector as it is not economically viable. Specific radio provision for the older audience, one which really values its radio, must be protected if the BBC is to address areas where the market cannot. The draft licence fails to do this.

Accordingly, this response focuses purely on the BBC local radio provisions.

Local radio is self-evidently an area which commercial stations are vacating. BBC local radio operations will be the only ones remaining; and yet this **draft licence permits destructive regional networking -and beyond - at levels which are ill-defined.**

The proposed licence **allows the BBC to move from a solid, regular local news service to one which broadcasts such news ‘at intervals’.** How does this square with the desire for plurality of news sources and holding decision-makers to account?

Whilst it is argued that the BBC Board will safeguard matters above and beyond the Ofcom provisions, BBC executives' wishes about BBC local radio are already clear, by virtue of the changes

previously sought and rejected by the Trust. Were regulatory supervision not required, there would have been no role for Ofcom.

It seems to me that Ofcom's draft licence appears to permit a BBC local service which is largely networked - with sparse local news bulletins and a few local features; targeting anybody the BBC wishes, playing the music anyone fancies, with very little by way of genuine, passionate, championing local content.

In the fiftieth anniversary of Frank Gillard's creation, how can that be allowed?

BBC PUBLIC PURPOSES

It appears odd that under Purpose (1): 'To provide impartial news and information to help people understand and engage with the world around them', there are **no explicit requirements of BBC local radio**, whereas Ofcom does see fit to impose them on Radios 1, 1Xtra, 2, 3,4, 5Live, 6 Music and the Asian network.

Under Purpose (2): 'To support learning for people of all ages, there are **no explicit requirements for BBC local radio**, whereas Ofcom does see fit to impose them on 1, 1Xtra, 2, 3,4 and 6 Music.

Under Purpose (3): 'To show the most **creative, high quality and distinctive output and services (Distinctiveness)**, there are **no explicit requirements for BBC local radio**, whereas Ofcom does see fit to impose them on 1, 2 and 5Live.

There are some BBC local provisions under Purpose (4): 'To reflect, represent and serve the diverse communities of all of the United Kingdom's nations and regions and, in doing so, support the creative economy across the United Kingdom, although the **extent of dedicated programming for these diverse communities is permitted to be seriously reduced by the draft licence.**

Under three of the four BBC Purposes, there are no requirements for BBC local radio to contribute; whereas demands do exist on other radio services.

TARGET

The requirement that BBC local radio serves the 50+ generation is absent from the draft licence. It stipulates that Radio 1 should serve 'younger audiences', but not than any other service should explicitly serve grown-ups - despite 50+ audiences being wholly unattractive to commercial broadcasters.

Whilst the BBC must report to Ofcom on how it addresses diverse audiences, that analysis pertains to the BBC's output as a whole, not to particular services - let alone individual local radio services. Such scrutiny will come as little comfort to the **31% of BBC local listeners who consume no other BBC radio.**

The only BBC station currently targeting the huge over-50s generation is BBC local radio. In the future, the service can target whomsoever it wishes. Already, a poor operational focus on this demographic has resulted in a listening share decline amongst those aged 50-70 of 28% in the last five years, vs a drop of 17% amongst adults**. The absence of any focus will result in further deterioration.

BBC radio overall does appear, statistically, to serve older audiences well currently in terms of audience volume, principally because that generation loves its radio habit. Indeed, it is because it adores its radio that its stations must be protected.

NEWS

The requirement for news is depleted: The BBC must now only ensure that a station ***"provides news and information of particular relevance to the area and communities it serves on local radio at intervals throughout the day"***; and that it *"provides other content of particular relevance to the area and communities it serves"*.

This service which has hitherto proudly broadcast a huge volume of local news, and formed a part of the BBC news division, may now be **reduced to broadcasting news 'at intervals'**. **This definition must not be countenanced.**

The Trust's review into BBC local radio (March 2016) stated: *"...given the deep concerns regarding the potential impact of the BBC on local news markets, we are clear that there is a need for ongoing regulatory oversight of BBC's scope in local news"*. This regulatory insight appears to be absent.

MUSIC

The requirement that BBC local radio plays a certain sort of music is now absent, as is the targeting of such music. There is no longer any restriction on how much music may be current or otherwise. Local radio may adopt as mainstream a music policy as it wishes, away from the differentiated, more mature music format it has sensibly adopted.

The requirement for specialist music has been removed.

The requirement for encouraging local new and emerging musicians is no longer present.

LOCAL

Under the draft provisions, stations may share a huge amount of programming with ease. Whilst the time allocated on each BBC Local Radio station to original, locally-made programming must not be less than 95 hours (was 85), "original, locally-made programming" includes programming shared with neighbouring stations. There is no limit on such sharing, despite a shared programme between two stations becoming significantly less local to both.

Under the draft, the BBC could merge station X with Y, provided both patches were covered adequately as part of a broader editorial agenda. Indeed, mega-regions or the whole network might be merged, provided inserts of local news and features were injected throughout the day.

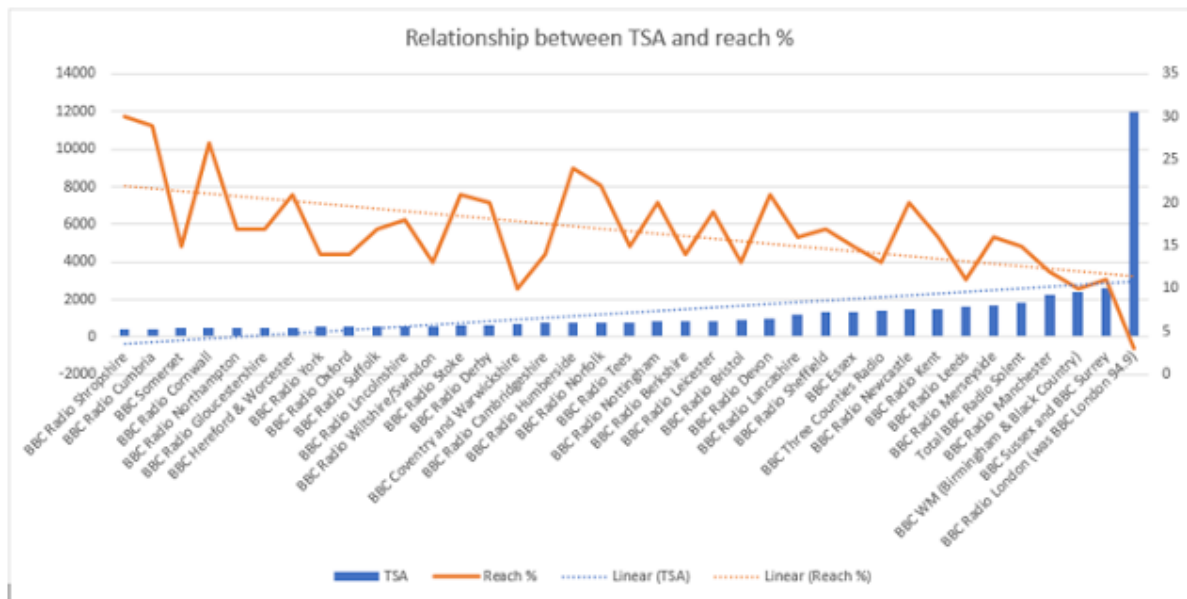
Whilst, arguably, the former Trust service licence enabled more programme-sharing than had been implemented, this new licence seems to facilitate more sharing thanks to diminished content requirements which can be dispensed with ease in programmes serving a larger patch.

There appears nothing in the draft licence which prevents a local station from merging all content completely with an unspecified number of neighbouring stations. Outside of the all speech breakfast programme, all stations could be joined together.

Regional radio cannot serve the purpose of local radio. Regional identities, in many cases, frequently live only in the minds of bureaucrats and media organisations. One can have as little in common with the city next door as a city right across the country - and there may be destructive rivalries. In some 'regions', if you are not local, you may as well be national.

It is already the case that the **larger stations tend to have a smaller % reach**; and there is clear correlation between TSA size and % reach. Furthermore, in any regional plan, **it is the smaller communities which miss out most**, as content naturally emerges from the populous areas.

Making stations bigger, by default, will render them less successful.



As more regionalisation or networking is permitted, off-peak and weekend programming will likely suffer first - such times when programming has been able to be beautifully specific and distinctive in its appeal and its audience share maximised. **The evening programming, networked since 2013 and replacing dedicated local programming, has diminished audiences. If this is the trial, may we declare the matter proven?**

Even if less dramatic levels of networking are implemented, one imagines that all stations will seek to regionalise large parts of the daytime and weekends. Weekend afternoons attract a larger audience share than weekday afternoons. Off-peak programmes, where an older audience turn to radio when others do not, are particularly valued.

BBC local radio attracts an audience for the company it provides. In the absence of that company, any news bulletins will be served to a diminishing audience. A 'serves all' local service' will not generate a meaningful audience; and the lack of focus on a target audience hitherto has been responsible in part for the network's decline.

Government now attaches renewed emphasis on affording influence to local communities, yet this draft licence allows BBC local radio to be subsumed into networks with occasional local 'windows'. As local press is under threat, and money is injected into BBC 'local democracy' schemes, this draft Ofcom licence allows the atrophy of platforms on which such reporting might be carried.

Funnelling occasional local news reports into 'windows' in networked programmes fails to achieve what BBC local stations have hitherto.

The specific requirement for local passion is gone. A BBC local radio station is no longer necessarily expected to 'champion' an area; nor hold decision-makers to account; nor play a part in 'a shared sense of civic responsibility'.

I assert that the particular needs of BBC local radio audiences have not been considered fully in the draft of this licence.

"They breathe the same air, support the same football team, complain about the weather and they can bring me a smile when I am feeling down".

...a tribal feeling of comfort through an association of place. The best definition of a local station is the area where the buses run. Beyond the final the final bus stop on that route is someone else's land - someone else's community." (Michael Barton, former Controller BBC local radio 1975-1988, 'Radiomoments Conversations Interview, June 2017)

OTHER CONTENT

Interactivity is no longer a pre-requisite.

Religious programming and programming on minority sports or for minority audiences is no longer required.

The 60% speech across 0600-1900 - and an all-speech breakfast is retained. There is little indication what this speech might comprise; but the stipulation is welcomed.

GENERAL

In Ofcom's 'distinctiveness' research summary (March 2017), BBC local radio is mentioned but once, despite the existing service being hugely distinctive from its commercial competitors. BBC national radio was commended but the report conceded, *"a few participants suggested that BBC Radio could be more distinctive by showcasing even more non-mainstream music, or by more coverage to local issues and music"*. So, despite the fact that this was cited as the only adverse radio comment in the research summary, Ofcom chose to diminish the importance attached to these areas in its proposed licensing regime.

Regionalisation is the route commercial radio has adopted. Surely, however, this is part of why publicly funded radio exists: to provide services which are not sustainable on a commercial basis. The justification for BBC local radio is greater now it may well be the only locally-driven service in the market. What's more, as commercial radio has its news provision regulation hardened by the regulator, that of BBC local radio is lessened.

ECONOMIC

The cost of BBC local radio is rightly not a concern for Ofcom. As an expensive multi-site operation, however, BBC local radio cannot afford to carry on as it is. But, as many have pointed out, a proud, solid and popular locally-tailored news, chat and music service can be delivered at a considerably lower budget than is currently being spent.

BBC local radio stations are not structured for maximum efficiency. They remain over-staffed and over-managed. There are many models of successful operations in the smaller commercial and community sector, producing high quality output at a fraction of the cost. Gifted leadership, capable management, and a small committed and agile staff, together with judicious use of technology and

reduced central overheads and intrusion, can deliver an even richer local service than now without leaning lazily on unwarranted regionalisation. I make these comments as someone with considerable insight who has worked in both BBC local radio and commercial radio for decades.

Having worked both in the commercial sector and the BBC sector for many years, I recall running two LBC news/talk stations at half the cost of BBC Radio London and attracting double the audience.

RELEVANT INPUTS

The draft sits ill at ease with all published insight:

"Overall, audiences are pleased and satisfied with BBC Local services. There was a lot of warmth for the BBC Local offer in the six case study regions visited. Audiences felt it was important that they "had a voice" via regional BBC media and that their local news and information was being presented and delivered to them by people who live in, and understand, the region. BBC Local Radio was particularly valued, especially by older listeners (60+) who found it gave them companionship. Audiences like how BBC Local Radio keeps them informed about local news and events, whilst the debates and phone-ins help listeners feel involved in their community" (MTM Research summary for the BBC Trust, 2015)

"Audiences have very positive perceptions of BBC Local Radio regarding its quality, accessibility and ability to engage them. Our evidence has shown that BBC Local Radio is not just distinctive, but unique in many respects – the BBC's local stations are often the only ones in their area offering local content across the daytime schedule. The stations are distinctive in other respects too: their focus on serving older listeners, their high level of news and speech, and their provision of many opportunities for listeners to have their say." (BBC Trust Service Review BBC Local Radio and Local News and Current Affairs in England - March 2016)

RECOMMENDATION

- Twelve hours of dedicated solus output 7 days a week on all stations, during which a maximum of three may be shared with other stations within a cohesive, established region.
- News bulletins every hour weekdays.
- All speech breakfast programme.
- Over 50 audience target stipulated as reflected through music and speech.
- Retaining the umbrella requirement for these stations to champion their local communities
- Allowing the BBC to revisit the question of the extent to which it should provide BBC local radio in the biggest UK cities where audiences have traditionally been the lowest, freeing funds to allow it to continue to invest in its smaller areas.

ABOUT THE AUTHOR

David Lloyd is a time-served radio executive, variously programming and managing LBC, LBC News, Virgin, Galaxy, Century and launching Lincs FM. He was an award-winning broadcaster at Trent and Leicester Sound.

David spent three years at the former regulator, the Radio Authority, where he was responsible for compliance and strategy including creating Formats and the early DAB development. David spent two years at the coal-face in BBC local radio and a famously brief spell as a regional head.

In a hobby capacity he is a radio historian, blogger and archivist; and the author of 'How to Make Great Radio' (published 2015); and 'Radiomoments', to be published in September 2017.

A Fellow of the Radio Academy, he hosts the annual Techcon conference, and served for several years on the RadioCentre commercial radio industry public affairs sub-committee. He is on the ASA's General Media Panel on advertising and the British Library's archive committee.

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