Name Withheld 5

Ofcom consultation on the Draft Operating Licence for the BBC's UK Public Services.

Submission from a freelance screenwriter

I write to support the work of the BBC in providing original content for all British audiences, particularly in genres under-served by commercial media. As a children's writer, I am particularly concerned with the output of BBC Children's, and the following comments concern mainly that.

CBBC is a leading force for good in the complex and shifting world of commercial media for children. Left to their own devices, commercial media outlets follow the money and fail to offer children content of real range, quality or independence. The British children's media sector has suffered from market failure since deregulation, and is it clear that the BBC plays a critical role in providing high quality, original, British content that commercial players will not. And it does so on dwindling budgets. It's a cliché to say it, but the range and quality of CBBC's output is the envy of many broadcasters around the world. It is matched – only occasionally – by a small number of public service broadcasters when they work together, and when they draw on public subsidies to do it.

I broadly support the proposals outlined in the draft document. I endorse the emphasis on distinctiveness in section 1.16.3. And I support the requirement to serve older children (1.24.30). I also agree with the principle of programming quotas.

However, I fear that the requirements for diversity and distinctiveness are open to interpretation. Unless these are more carefully defined in terms of original output of a particular quality (i.e. cost-per-hour), financial pressures may result in 'quota quickies' to fill these hours and free up budgets for other, less original programming.

I would like to see the quotas set higher. It's not enough to protect the programming output at current levels. Taken across the board, the total number of UK children's programming hours are substantially down on pre-deregulation levels, and are much less than children need and deserve. Ofcom should press commercial broadcasters hard to supply good original children's programming in exchange for the privilege of access to the public airwaves. And it should protect and extend CBBC's remit to do so.

Of course this takes money. And while I welcome the cash injection of £34m announced last week for BBC Children's, like many in the industry, I fear that this money will not be used to create new and original content. Instead it will be swallowed up by reversing recent cuts, infrastructure, and by extending digital services – i.e. platforms – to create more outlets for spin-offs of existing content.

I appreciate that CBBC's policy of 'fewer, bigger, better' is an attempt to compete with the SVODs and stretch their own dwindling budgets further. However, larger commissions of a smaller number of the most successful existing shows means cuts to commissions for new shows. This limits innovation and risk-taking, squeezes out new ideas, and will inevitably lead to a situation where once-successful shows are exhausted but there are no new ones to take their place.

I therefore believe that the requirement for new original first-run content should stipulate new original titles, short- and long-form formats, and new voices.

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