

Local Local Local Ltd response

Having had experience in being part of the team that won the original L-DTPS licence in Birmingham, sitting on the original make up of the Local TV Association, founding a local digital tv platform in Stratford upon Avon and then working with Inclusive Digital, the University of Bedford, local production companies and others to build a local consortium in Luton and Bedford to apply for the original licence when it was advertised, I have submitted separate responses by email in regard to both the Luton/Bedford area and Stratford upon Avon.

RESPONSE IN RELATION TO LUTON AND BEDFORD LICENCE ONLY

Initial work was done in the Luton area in 2011, including a response by the University of Bedford to the Ofcom Local TV consultation exercise. Following a detailed feasibility report in August 2013, a local consortium was brought together to apply for the licence for Luton and Bedford under the name of Bedfordshire Television. The full L-DTPS application was submitted on January 7, 2014. A copy has been attached to this email response to the consultation for ease of reference.

The application included funding and studio facilities from the University of Bedford, but involved much wider support from a cross section of the community, media production companies, local businesses and groups. Prior to the application being formally considered, for various reasons the University decided internally to pull out from the consortium and withdraw its funding commitments.

This left the rest of the consortium in the position of a fully worked up proposal which had been withdrawn, with no opportunity to find or develop a new funding proposal to support the licence application. A situation recognised in an email exchange, where we wrote to Ofcom on April 4, 2014;

“We do think it would be appropriate for Ofcom to consider Luton in a different way from other areas where you re-advertise, where for instance you may have decided not to award a licence or where there were no applications.

In Luton we have very different circumstances, where initially you consulted and brought the Luton and Bedford areas together and then a consortium was developed of local creative businesses and others, with a major funder in the University... At least two of the consortium parties would have submitted their own separate applications before everyone came together under the one application, which would have enabled you to potentially award the licence in any case.

The other original consortium parties and other local companies do not want to miss out on the chance to apply for the licence and we are initiating talks with other possible funding partners and working on the best model to develop for submission.

It would be difficult to have those talks, particularly on funding, without a clear indication that we

will have this opportunity ... but it would seem equitable to allow us to submit a different, yet sustainable application in the light of all these events."

This was responded to by Ofcom, on 14 April 2014:

"We recognise the unique circumstances of this particular licence advertisement and we are sympathetic. We are intending to advertise the remaining set of licences before too long, and we will consider including Luton in that group."

The situation today is that many of the consortium partners including Local Local Local Ltd and Media-Vu, both with substantial broadcast media experience, would still wish to come together to apply for a licence to run the service in Bedfordshire. This would be on a community-based not-for-profit model, to deliver real impact for the communities in Luton and Bedford, developing best practice, truly Community Media and bringing the area together to increase inclusion and a cohesive community.

Over the past 4 years the situation may have changed within the University, such that we would wish to explore whether they would want to be involved in any new application on a different basis, something we cannot do if there is to be no possibility of the licence application process being opened up again.

Luton is thriving and we've just had the Luton Carnival which is now established as the largest in Europe to underline the town's diverse and pro-active outlook. The council are considering a 'credible and attractive bid' to become the UK City of Culture in 2025. Luton town centre has just been awarded purple flag status, which is a sought after accreditation from the Association of Town and City Management (ATCM) that provides a 'vibrant mix of dining, entertainment and culture, while promoting the safety and wellbeing of visitors and residents.'

The Capability Green Business Park continues to grow with businesses relocating from London, including such businesses as Astra Zeneca, Selex Galileo, Oracle, Ernst and Young, Randstad and Regus; over £160 million is being invested in the London Luton Airport; and Luton Town Football Club has just won promotion to League 1 and is pushing ahead with its new stadium in the Town.

All in all things are on the up and Luton is ready for a local tv service to reflect the array of interests, groups and communities.

Specific comments on the current Ofcom Consultation document

2.4 and 2.8: Luton/Bedford is one of the areas that Ofcom consider that there is a "reasonable chance of [a service] being economically viable".

2.6 Table 1: We addressed the coverage area specifically in our Application in section 2 (c) which is attached to this response.

2.7 Table 2: You state that there was no expression of interest at the time of advertisement, when in fact a full application was submitted by our consortium.

2.11: Your argument about the financial impact of launching additional services on both Comux and the rest of the existing network, does not allow for firstly, that Comux budgeted and received funding for additional transmitters over and above what they have so far delivered, and that if the overall audience level of the local tv network grows, then additional revenues should be able to be gained to further support the whole network.

2.12: In regard to “potential consumer and citizen benefits” we would argue that in an area such as Bedfordshire (and Luton in particular), the benefit of having a channel positively promoting an inclusive and cohesive community, bringing new opportunities for civic pride and an integrated cultural identity would bring many benefits of direct citizen and community benefit.

2.14 and 2.15

We believe the above points address your questions in these sections and why Luton and Bedford should be considered differently from other potential areas for a L-DTPS licence.

A new licence application period would give the opportunity for a truly local proposal to be submitted that serves the area and for a new funding and delivery mechanism to be developed.

The Luton and Bedford areas have a distinct cultural identity that currently has no way of coherently expressing itself and is too often assumed to be only a ‘commuter-belt’ for London. A L-DTPS service would allow the community to come together and to build a truly local and distinct community-based channel that would benefit the whole community.

With the background of the previous application for this L-DTPS area we hope there can be another chance to deliver a successful application.

Thank you.

[Attached - Original licence application document dated, 7 January 2014.]