

HNBT Response to Ofcom Consultation: Localness on commercial radio

from

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The Heart of the Nation Broadcasting Team's Consultant, Mr. J Peter Wilson, gives our views in answer to Ofcom's invitation to comment on its consultation published on 22 June 2018. We give our answers to the consultation questions as well as making some additional comments.

Introductory Comments.

When I first read this consultation what jumped out at me, being a Yorkshireman, was that in drawing up the plans for larger 'approved areas' Ofcom have placed the Northallerton/Thirsk FM licence within the *North East of England* approved area rather than in the *Yorkshire (including Lincolnshire)* approved area. I am sure that residents of Northallerton and Thirsk as well as councillors and officers of North Yorkshire County Council, which has its County Hall in Northallerton will feel, although parts of Northallerton may receive their ITV local news from Newcastle upon Tyne rather than Leeds, that the local Northallerton/Thirsk FM commercial radio station operated by *Minster FM* clearly is within Yorkshire and not the North East of England.

Question 1. Do you agree that Ofcom's duty to secure 'localness' on local commercial radio stations could be satisfied if stations were able to reduce the amount of locally-made programming they provide? If not, please explain the reasons and/or evidence which support your view.

If these proposals to reduce the amount of locally-made programming are to be implemented then we believe that there must be an **increase in local/regional news provision at peak hours**, as well as keeping the existing amount of 'local content'.

It is very important that local/regional news provision as well as 'local content' continue to be part of local commercial radio broadcasting otherwise there will be a democratic deficit if local news is limited to only BBC local radio and there is no local/regional news on commercial radio.

It is often the local commercial radio station, as my days at *Stray FM* showed, that was/is the first local news outlet to break a story.

While the research that is attached to this consultation reports that the most important driver for listeners to a specific local station is 'It plays music I like', however, often across great swathes of the UK the only commercial radio stations available to listeners are local variations on national brands and therefore for these stations it is essential there is both local content and local/regional news.

It is interesting to note that in parts of the country that still have a strong regional identity, such as Yorkshire & Lincolnshire and Devon & Cornwall, we find that local commercial radio stations with their studios within the area are able to play music that appeals to the local audience mixed with both local content and good local news.

In fact, the local commercial radio station on the Yorkshire coast – *Yorkshire Coast Radio* – must be getting it right as it continues to get high listening figures as shown in RAJAR Q1 2018 where it had a 48% Reach and my old station – *Stray FM* – had a 30% Reach as did *Lincs FM*. We would suggest that local stations that are getting over 25% Reach in their area are getting the mix of music, local content and local news right.

It therefore must be the aim of these revised Ofcom regulations to see that local stations continue to be 'local' in their output regardless of where in the new larger approved areas the physical studios are based.

Question 2. Do you agree with our proposed amendments to the localness guidelines relating to locally-made programming? If not, please specify any amendments you think should be made instead (if any) and explain the reasons and/or evidence which support your view.

Yes, but only if there is an increase in local/regional news provision at peak hours.

Question 3. Do you agree with our proposed new approved areas? If not, please specify any alternative proposals you think should be considered (if any) and explain the reasons and/or evidence which support your view.

While Ofcom currently state that they "*have never prescribed minimum durations for any type of news bulletin, as that is a matter for the licensee, we would always expect each enhanced daytime bulletin to feature more than simply headlines, and to include at the very least one fully-formed local news story, and normally more than this, alongside national stories.*" We believe that the size of the new enlarged areas enables local radio stations to share broadcasting resources, but they must keep a local news presence within the license area and continue to broadcast 'local content'.

An added advantage of the larger approved areas should be that it will enable stations to include news items from across the region as well as just the local transmission area. For instance, a West Yorkshire station in Leeds or Bradford/Huddersfield should have local stories as well some from other parts of the new

larger approved area such as reports on the One Yorkshire Devolution proposal or when flooding of rivers causes problems in Hull and York as well as in Leeds.

Yes, we do agree with the new larger approved areas **provided that the Northallerton/Thirsk FM licence is within the Yorkshire (& Lincolnshire) approved area** as we stated in our Introductory Comments.

Question 4. Do you agree with our proposed amendments to the localness guidelines relating to local material? If not, please specify any amendments you think should be made instead and explain the reasons and/or evidence which support your view.

While we have no objection in principle to the reduction in locally made programming, as suggested, **however we do feel that there must be an increase in the amount of local/regional news**, both for stations providing 'local news' and those providing 'enhanced local news'.

We would suggest that if local programming is to be reduced on local commercial radio by the amounts suggested by Ofcom then **the amount of local news must be increased to between 5 to 6 minutes of local news per hour during peak times on all local stations** and that stories should cover both items from within:

- the transmission area of the station and
- the larger 'approved area' in which the station is operating.

We would therefore suggest that the following alterations, that are added in **green**, are made to the guidelines in Ofcom's 'Local news provision' section:

Local news provision

Because of the particular importance to citizens and consumers of local news, all stations required to broadcast local material should broadcast local news at least hourly throughout peak-time both on weekdays (breakfast and afternoon drive) and weekends (late breakfast). Those stations which have committed to an enhanced news service (see below) should broadcast local news at least hourly during daytime on weekdays (6am-7pm) and throughout peak-time (late breakfast) at weekends.

Local news content:

- Local news should be high-quality, relevant, timely and accurate, as well as complying fully with the requirements of the Broadcasting Code.
- A station should be able to react on-air to major local events in a timely manner.
- Bulletins should seek to reflect the interests and concerns of listeners living in the area.
- Local news stories should be up to date and regularly refreshed.
- Local news bulletins should also feature nations' (if relevant), UK-wide and international news.
- The amount of local news, and the balance of local and national news in any particular bulletin, should be subject to professional journalistic judgements, but local news will always be an essential characteristic of a local station's overall output.
- Simply localising UK-wide news (e.g. conducting vox pop interviews in one area and playing them out as if from another or inserting local place names into UK-wide stories) without local news / information generation would not be regarded as a contribution towards localness or fulfilling local news requirements.

- While local sports stories can make a significant contribution to delivering localness, and can represent an important part of a local station's editorial mix, local sports news would not be regarded as being a substitute for local news stories.
- Similarly, entertainment news may be relevant locally but should not be the main ingredient of local news bulletins or a substitute for more serious local news stories.
- **At peaktimes, and only at peaktimes, the amount of local news stories should be between 5 to 6 minutes per hour including stories both from within the local station's transmission area and from the larger 'approved area'.**

'Enhanced' local news services

Some local stations have committed to providing an enhanced local news service in return for being able to broadcast a greater number of networked hours (i.e. programmes not made from within their licensed, or approved, area) during daytime programming.

The enhanced local news option gives stations the flexibility to reduce the number of local hours produced, should they wish to make associated cost savings. The provision of local news bulletins during daytime, as well as peak-time, helps to ensure that the station's local content and identity is maintained during these daytime networked hours.

It therefore follows that local bulletins running during daytime hours as part of an 'enhanced' news service should not be merely tokenistic box-ticking exercises, and each bulletin should meet the requirements set out for local news in general (see guidance above) just as comfortably as bulletins aired during peaktime (i.e. weekday breakfast and drivetime, and weekend late breakfast).

While we have never prescribed minimum durations for any type of news bulletin, **outside peaktimes**, as that is a matter for the licensee, we would always expect each enhanced daytime bulletin to feature more than simply headlines, and to include at the very least **two** fully-formed local news **stories**, and normally more than this, alongside national stories. In cases where stations are sharing their local hours within an approved area (see notes on 'co-location and programme sharing, below), and are broadcasting the same news bulletin across more than one licensed area, at least one of the local stories in each bulletin needs to be directly relevant to listeners in each of the licensed areas. This is because stations sharing their local hours remain separate licences which still need to satisfy the localness and character of service requirements set out in their individual Formats.

Local news production

- Any group of stations may choose to pool their news resources and operate one or more 'news hubs' in a way which makes operational sense for them. However, in order to provide a comprehensive local news service in touch with the area it is covering, each station should have direct and accountable editorial responsibility for covering its licensed area.
- There should be an appropriate provision of professional journalistic cover, based within the licence area (or approved local area if appropriate), on days when local news provision is a Format obligation.
- The pre-recording of news bulletins should be an exception rather than a rule and peak-time bulletins should always be broadcast live (or pre-recorded only shortly before transmission).

Modified extract of Ofcom's Guidelines for Local News Provision on Local Commercial Radio.

The 5-6 minutes of local/regional ('approved area') news could be split in a number of ways such as two 2.5 minute bulletins ('Half-hour News') or three 2 minute bulletins ('20-20 News') or four 1.5 minute bulletins ('Local News every 15 minutes'). So, for instance, news stories broadcast by *Aire FM*, *Lincs FM*, *Minster FM*, *Viking FM* and *Yorkshire Coast Radio* should all have items from their respective transmission areas and also from the new *Yorkshire (& Lincolnshire)* approved area. This amount of local news at peak times must be in addition to any national/international news items.

With Ofcom proposing to allow commercial radio companies to reduce the amount of locally-made programming on FM local stations during weekdays, within these new larger 'approved areas':

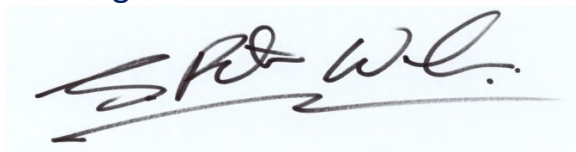
- from 10 hours to 7 hours if they provide local news only at peak times (breakfast and afternoon drivetime);
- from 7 hours to 3 hours if they provide local news – 'enhanced local news' – at least hourly from 6am to 7pm.

It is therefore essential that localness on commercial radio is enhanced with the broadcasting output containing more local/regional news and sustaining the existing amount of local content regardless of where the studios are based within the new larger approved areas.

We would hate to see a democratic deficit caused by local commercial radio, if in the future, local radio news coverage was mainly or only provided by BBC local radio.

We trust that our response is of help to Ofcom.

Kind regards



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