

I do not agree with plans to alter the approved areas for localness.  
This would lead to a detrimental drop in the quality of local broadcasting.

For example, my part of Lancashire is already dominated by broadcasting from Manchester. The stations that are supposed to be local, Rock FM / Rock FM2 / Heart North Lancashire (The Bay) fail to reflect the area. Recording presenter content and news from Manchester is fooling listeners. Manchester and Liverpool have very little in common with Preston, Blackpool and Lancaster. These places would miss out because of the dominance of Manchester.

If you do approve the plans there should be a commitment to quality local content:

- meaningful local content, not just recorded weather, traffic and what's ons
  - quality local news. Have more than one reporter based in local areas to gather quality audio news content. Stations shouldn't be able to rely on phone clips.
- Local news should have local content and not just be padded out with national and entertainment news.

If you do approve the plans you should carry out a FM frequency audit to create space for more community stations.

For example Bauer instead of Rock FM on 97.4, Radio City on 96.7 and Hits Manchester on 103fm - they could broadcast a North West Service on just one of those frequencies.

Likewise the 105.4fm could be extended to replace the Heart Lancashire service on 96.9fm.

If an existing radio group wants to regionalise their local stations within the newly approved areas, then Ofcom should first re-advertise the local licence to assess if there is demand from other interested businesses in running a local service before making it Regional. This would remove any complacency from incumbent broadcasters who would exploit the regulations to put greater profit over genuine local content.