

Consultation response form

Your response

Question	Your response
<p>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.</p>	<p>Ofcom's own survey shows that some people very much value having local presenters. Just because this reason didn't come top in the survey does not make it irrelevant. With between a fifth and a quarter of people valuing local presenters, this sizable chunk of people are in danger of being badly served if these proposals go through. If 'localness' means having a local flavour then despite advances in news hubs and networking of programmes from other areas, there would most certainly be a reduction in localness that would have both an immediate and long-term impact.</p> <p>Local markets often feed people with local and regional accents into the wider mainstream. Without the talent development opportunities provided by having local and regional broadcasting, regional diversity in broadcasting would be reduced.</p> <p>These proposals ignore a substantial number of people who value local presenters (as shown in Ofcom's own research), they would disadvantage budding broadcasters growing up outside of London and would harm 'localness' rather than secure it.</p>
<p>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</p>	<p>The consultation says in point 3.7: "It is also relevant that locally-made programming is relatively costly for commercial radio companies to make because of the need to maintain separate studios and presenters, when programmes can now technically, and often</p>

the reasons and/or evidence which support your view.

more efficiently, be made centrally. Our analysis has shown that locally-made programming is typically the highest single cost for local stations as a proportion of their costs.

However high that cost-base is, there is no doubt that having local broadcasting facilities helps with making money for radio stations. Even without local studios those stations would have to have sales reps based somewhere. To maintain a building but not the actual broadcasters would surely fly in the face of securing 'localness'. Indeed whilst local radio sales have a higher cost-per-sale, they are also more resilient in an economic downturn. In the last recession there was a downturn in national advertising revenue but local and regional revenues were more robust as the client relationships were people-based, rather than based around an ad planner in London pressing a button to plan ad-spend.

At the end of July 2018, The Radio Centre hailed the Advertising Association research that showed radio was the fastest growing medium with advertisers (even outstripping the internet) by saying:

"Radio is on a roll, and the medium continues to build momentum. After announcing record revenues for commercial radio and highest ever audiences earlier this year, these latest figures are further proof that the Audio Revolution is in full swing.

"Advertisers are recognising the true scale of the impact radio has for their brands and investing accordingly, so this boom for our brilliant industry shows no signs of slowing."

The Radio Centre has also hailed the fact radio has just had its biggest ever audiences and highest ever revenues. Radio is currently outstripping growth by the wider media industry – and doing so under the current regulatory model. There is no compelling financial or audience-related reason for the current regulatory framework to be stripped back at this point in time. It's not broken and is

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.

not in need of fixing. Current industry statistics back this up.

These areas are far too large to be considered defined regions.

North Scotland and Northern Ireland are different countries and separated by the Irish Sea. The idea that these could be the same broadcast region is not credible and would clearly fly in the face of Ofcom's duty to secure localness.

The largest of the proposed approved areas outside of London is The Midlands. This region has two distinct populations to it. The ITV region in recent years has even split its news provision because East and West Midlands together was too large. The East and West Midlands are very different in character and this huge population area, which is an area of economic growth is perfectly able to sustain a separate East and West area.

Keeping North and South Wales as separate approved areas would help prevent everything from being based in Cardiff. You can only secure 'localness' when you recognise that an urban area like Cardiff has a very different mindset from that of some of the North Wales rural, Welsh-speaking communities.

The South West seems poorly served by the new West of England area. It is hard to argue that Southampton and Newquay have enough cultural or geographical convergence to warrant being lumped together. There is a greater cultural commonality between places like Bournemouth, Southampton and Brighton.

The danger with the whole proposal here is that it will likely reduce the number of buildings that broadcast radio. Aside from the cultural and economic impact and what appears to be a move away from securing 'localness', this could cause problems when legislation is eventually passed by Parliament. The DCMS recommendations have yet to be scrutinised by MPs, some of whom may have concerns over localness, regional diversity and

	<p>economic impact. There is the possibility (especially as we currently have a minority Government in a confidence and supply arrangement with a regional political party) that some of Ofcom's actions could be over-ruled by Parliament, thus causing considerable cost to operators who might have to open new broadcasting centres.</p>
<p>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 evidence which support your view.</p>	<p>Broadly speaking I agree with this aspect. There is more to a local service than news, travel news and mentioning local events or places. It is also local accent, dialect and flavor that is much harder to measure. However, while I agree with this proposal more broadly, these amendments would do little to secure 'localness' if there was a reduction in locally made programmes and a dramatic increase in the geographic size of approved areas.</p>