

Consultation response form

Consultation title	Localness on commercial radio
Full name	Stuart McDonald MP for Cumbernauld, Kilsyth and Kirkintilloch East

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.

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.

I strongly disagree that the duty to secure localness could be satisfied through the proposed changes to the required volume of locally-made programmes.

While it is certainly true that programmes which would nominally fit the criteria of local news, traffic and weather could be produced outwith the local area the quality and relevance of such programming to listeners would be bound to suffer.

There is a great deal of value in having programming produced locally, where presenters and producers have an intimate knowledge of the particular traffic hotspots, the issues that resonate with local listeners and even the weather outside.

During the most recent major snowfalls local radio played a crucial role in providing information on school closures and up to the minute traffic information based on their own experience and first-hand accounts. These proposals would weaken the ability of local presenters to inform listeners of such major events which may only be occurring on a very localised level and thus weaken the quality and localness of the output.

I also believe that these proposals would have a particularly adverse impact within Scotland, where the lack of regional BBC radio stations means that local commercial radio stations have a key role in providing local content and news.

In the UK Government's previous consultation on this matter I argued that it was imperative that different arrangements for local radio in Scotland were made in order to reflect the distinctive characteristics of national identity and the role of local commercial radio in Scottish life, and I am deeply disappointed that these proposals do not address these concerns.

I believe that in relation to the number of hours of locally-made programming the status quo should remain and that consideration should be given to establishing a separate framework for the regulation of local commercial radio in Scotland.

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.

I do not agree as far as the impact on Scotland is concerned. The proposal to merge the approved areas Glasgow & South West Scotland and Edinburgh & the Borders into one region, South of Scotland, strikes me as deeply problematic.

The current boundaries for approved areas already allows for co-location across a relatively large and diverse area and combining the regions risks a further reduction in the distinctiveness of local radio stations – I believe that my constituents would not regard radio programming produced in Edinburgh to be ‘local’ given the distinct differences between the areas and similarly programming from Glasgow could not be regarded as local to the Borders.

I am also concerned about the proposal to create a North Scotland approved area.

I note that in response to the proposed creation of a North Scotland approved area during the 2009 consultation Ofcom reached the conclusion that this area was too vast, with too many obvious cultural differences between different areas, to allow co-location.

I believe that these arguments remain as persuasive today as when they were argued in 2010 and that the arguments against combining the Edinburgh and Glasgow regions could be made even more strongly against the creation of the North Scotland approved area.

Ultimately, these proposals fail to address the distinct cultural, geographical and linguistic differences between regions in Scotland and I believe it is imperative that the status quo with regards to approved areas in Scotland is maintained.

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 I am pleased that no amendments have been made to localness guidelines I do not believe that these are sufficient in ensuring local commercial radio remains sufficiently local.

Thank you for taking the time to consider my points and I hope that these points will be taken onboard to ensure both the localness of broadcasting generally and the distinctive nature of local commercial radio in Scotland are maintained.

I am happy for the entirety of my response to be published in full.