

Consultation response form

Consultation title	Localness on commercial radio
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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>Stations should not reduce locally-made programming, as since 2012, there has been a general consensus that local radio has been eroded by the following:</p> <ul style="list-style-type: none"> Generic content with no reference to area Showbiz material Networking from London 10am-4pm and 7pm-6am weekdays Minimal chat (or as social media calls it, speedlinks) <p>Stations need to provide local programming because there has been a survey carried out, November 2016, whose findings were:</p> <ul style="list-style-type: none"> Local content on Heart/Capital stations is minimal, and is mainly music-driven Bauer stations have lost their USP of locality and don't sound as good as 2001-2006 when they were more local in terms of content Things sounded better around mid-2003 when radio stations were more local and there was not as much syndicated programming. Listeners have little-to-no issues with pre-recorded programming, and voicetracking is gaining acceptance, slowly. Enhanced news is something that listeners to

Capital East Midlands, Clyde 1, Radio Aire, Hallam FM, Free Radio West Midlands, KLFM 96.7, Heart Kent have been requesting for the past six years.

Removing local breakfast shows and limiting local programming to three hours has not gone down well on social media, with people in the target audience saying things like:

“Local radio isn’t as great as it once was:”

“Capital’s good, but not as good as in 2004 when they sounded more local and interactive as Leicester Sound.”

“KLFM is too automated too much of the time, it’s supposed to be local, but too generic, I want more about what’s on”.

As it is, listeners want local programming back, and are concerned about the issue.

The use of Amazon Alexa devices have made this all the more popular for people to learn about local areas, if they’re not using the Internet.

Stray FM’s popularity via Alexa is one such example. (Source: research by Tallia Storm, July 2017)

Also, a “use-it-or-lose-it” clause has to apply with studios, which means that stations cannot become super-size regional stations, e.g. Rock FM/Key 103/Radio City merging into one local station with the proposed 3 hour output.

If a radio station wishes to do this it should be only for DAB feeds or online-only stations.

On that note, online-only stations should be regulated under Ofcom and treated as if they were FM, via an amendment.

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.

Localness guidelines should be changed slightly, namely:

- Local breakfast shows are highly important to listeners, unless the station is a specialist format like rock music, R'n'B or Asian music where the location is incidental to the music.
- Locally-made programming is of significant importance to listeners – unless it is incidental, due to formats like Radio X, Capital Xtra, Smooth Radio, where the music takes priority. (Source: Tanya Bardsley/Ampika Pickston, 2017)
- Local news is important to listeners, and a survey by Louisa Johnson, British pop star and celebrity, found that 85% of the British public considered local news on radio important and said the quality of the bulletins was poor.
- Research from an anonymous source who I cannot name for privacy reasons due to the Vote Leave campaign in Brexit has found that 93.5% of adults aged 30-50 consider locality important (source: April 2017).
- Research by Dua Lipa, British celebrity, in August 2017, found 92% of people 18-30 considered local references and locally-produced radio important to their listening needs, whatever the platform, whether it's FM, DAB or online.

Also, if a station covers any of these major cities listed below, it should have 19 hours local programming weekdays (Monday – Friday 6am-1am), 16 hours local Saturdays (6am-10pm), 10 hours local Sundays (6am-4pm).

The cities being:

Bedford
Birmingham
Bristol
Cambridge
Edinburgh
Glasgow
Gloucester
Leeds
Liverpool

London
Luton
Manchester
Newcastle-upon-Tyne
Nottingham
Preston

Localness guidelines would still be satisfied by pre-recording or voicetracking programmes, and the after 6pm Saturdays, 4pm Sundays, accounts for the specialist shows that air at weekends, and the chart shows the air on Sunday afternoon.

Co-location of stations is acceptable, provided it is within a single region or area (for example, Free Radio Black Country/Shropshire in Oldbury, Heart/Capital/Smooth in Birmingham, Radio X/Heart/Capital in London) but not when attempts are made to merge a single license together as a huge regional station consisting of stations in two separate regions— Capital East Midlands and Capital Birmingham as one station for reasons relating to Question 3.

The group of stations owned by the Wireless Group – 102.4 FM Wigan, 107.2 FM Warrington, 107.4 FM Bolton, is a good example of co-location, and it should also have this requirement: 13 hours local programming weekdays (Monday – Friday 6am-7pm), 16 hours local Saturdays (6am-10pm), 10 hours local Sundays (6am-4pm).

Programming should be shared between them, apart from the Vodafone top 40 chart show, and it should not be allowed networking from Stoke-on-Trent; basically, a mini-network for the towns of Wigan, Warrington and Bolton.

These stations have a fairly popular following on social media, due to promotion by spambot accounts and word-of-mouth.

Internet radio and listening via Amazon Alexa/Echo have made people more aware of locality, and they use radio stations Alexa as an alternative to researching online about places in some cases because they feel local radio can be easily sought via Alexa.

	<p>This is true for the many Britons who visit Florida each year.</p>
<p>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.</p>	<p>I believe that the current 31 approved areas being reduced to 12 makes little sense from a broadcasting point of view.</p> <p>It worked for print media with advertising, but due to the nature of radio being aural and interactive, it doesn't work this way as the areas are too broad in scope.</p> <p>What may work editorially in Essex won't work in Kent, or content for Devon won't suit Cornwall. This is one reason why approved areas should not be merged.</p> <p>Also, a "use-it-or-lose-it" clause has to apply with studios, see Question 1.</p> <p>If anything, South Gloucestershire should be treated as part of the South West Midlands, and not the West.</p> <p>It is a situation where everything works logically and correctly, and the 12 proposed areas don't take into account the need for localness, and this has proven controversial.</p> <p>Research over the years by people working in marketing and social sciences show that there is a general consensus that the East and West Midlands are two independent areas, and genericizing it to Central for radio makes no sense, especially as there has long been an East-West rivalry.</p> <p>Capital East Midlands and Capital Birmingham shouldn't be in the same approved area, mainly for these reasons.</p> <p>Heart Cornwall should be required to be local 6am-7pm weekdays (13 hours), 6am-6pm Saturdays (12 hours), 6am-4pm Sundays (10 hours, although exceptions can be made for a networked show 9am-12pm, lowering locality to 6am-9am and 12pm-4pm, therefore 6 hours local), although Heart Cornwall coming from Exeter is acceptable for geographic reasons.</p> <p>Approved areas should not change, although</p>

	<p>Central should be renamed Midland & Central.</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/or evidence which support your view.</p>	<p>I have an alternative proposal, in that stations should have a ratio of 60:40 for talk/music or 50:50 if they wish to.</p> <p>60% music, 45% content is speech, basically, but it must be meaningful with local references during the show, unless it is a networked show where location is incidental to music, e.g. dance/R'n'b show.</p> <p>This would apply on Capital, Heart (Global Radio), Hits Radio (Bauer) and stations such as KLFM 96.7 in Norfolk, Stray FM Harrogate.</p> <p>Studies from 2015 by a researcher who has to remain anonymous for privacy reasons (they were employed by the Brexit Vote Leave campaign)I have suggested this.</p>