



CSP/HVG/OFCOM
7 December 2018

Jon Heasman
Senior Broadcast Licensing Executive
Ofcom
via email: ([✕] Redacted for publication)

RE: Consultation on Approved areas in Scotland and Wales

Dear Jon

Firstly I would like to thank you for granting me additional time in order to formally respond to the consultation on behalf of my constituents in Cardiff South and Penarth.

Having received correspondence, met with constituents and having read your further consultation I would like to raise the following concerns with regard to Ofcom's final proposals.

With regard to locally-made programming I am concerned that whilst many of my constituents will still benefit from 'local' radio as they reside in the Capital City where we have large commercial broadcasters such as Global, Heart, and Capital, others within the Vale of Glamorgan would not recognise as much of a 'local' service. We already see issues with local radio stations struggling to sustain themselves financially and having broadcasting challenges to reach their entire area. With these issues being apparent in my constituency which is part of the Capital City and part of the neighbouring authority, I would be surprised if the issue of poor local radio coverage is not an issue across Wales. I am therefore concerned that should the proposed areas for Wales go ahead, any content produced in Cardiff would be unlikely to be appropriate for an area like Pembrokeshire.

I note the consultation refers to widening areas as a method of providing more flexibility to licensees on where they locate their studios, putting more resource into their production as opposed to the 'bricks and mortar'. However this not only impacts on the 'locality' of the content, but also local employment as it is more likely to lead to locating all studios in more built up areas such as Cardiff, Newport and Swansea. Whilst I would welcome the increased employment in my constituency, I would not do so at the detriment of others across North, West and South Wales. I would again reiterate my concerns that widening the approved areas could lead to generic content being used across the entirety of the approved area, with little regard for cultural or language difference in the populations.

After examining sections of the consultation which refer to what respondents have raised in the original consultation, I am concerned that the majority of responses appear to have come from the larger, commercial radio stations. There does not appear to have been any comment from smaller, local radio stations which will also be impacted by the proposed changes. I understand that large commercial stations have an obvious interest in the approved areas becoming larger as it allows the

opportunity for them to rationalise their estate and reduce costs across the organisation. It is a reasonable concern that for the majority of the larger commercial stations, this would be prioritised over the need to maintain true localised content.

There appears to have been little consideration regarding local journalism which is attached to producing local content, which would be affected should the proposals be progressed. The idea of relocating production of radio content to larger hubs, most likely in our cities, threatens the opportunity for journalism on a local level, as any news broadcast across the approved area would likely be produced at a more significant distance from where it is heard. This again threatens the cultural and linguistic heritage of certain areas further West and North in the country.

I am aware that members of the Culture, Media and Sport committee of the National Assembly for Wales have responded to the initial consultation. I have also shared some of my concerns with the Chair of the committee, Bethan Sayed AM. I will also share a copy of this letter with Bethan for her information.

Finally, I do appreciate that broadcasting is not a devolved function, but am raising concerns on behalf of my constituents. I would urge Ofcom to rethink their proposals for the Welsh regions and consider the importance of localised content and promoting employment not just across the industry, but also across the country.

Yours sincerely

A handwritten signature in black ink that reads "Vaughan Gething". The signature is written in a cursive, flowing style.

Vaughan Gething AM