Ofcom consultation

Localness on commercial radio

Further consultation on approved areas in Scotland and Wales



November 2018

Introduction

Global is a leading media and entertainment group, home to the country's best loved commercial radio brands Capital, Heart and Classic FM. Together with Capital XTRA, LBC, Smooth, Radio X and Gold, these brands reach over 25 million people every week on the radio, 10 million unique users every month on Global's digital platforms and 6 million people on Global's social media channels.

Global holds 68 local analogue licences and one national analogue licence, operated by Classic FM. Global broadcasts from 25 broadcast centres across England, Scotland and Wales and provides local and national news from 21 news hubs. Global is a strong supporter of digital radio - all our analogue stations are simulcast on DAB and we have several digital only or mostly digital brands that are all national propositions.

Whilst Global stated in its original response that we supported the move from the current Ofcom regions which apply to commercial radio to regions which more closely match ITV regions, we said nothing explicitly about Scotland or Wales. It was not accurate of Ofcom to quote Global in its response to say that it supported two approved areas in Scotland. We are therefore grateful for the opportunity to clarify our position with regards to these two nations.

Question: Do you agree with our revised proposals for approved areas in Scotland and Wales? 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.

Ofcom states in its revised guidelines aid that "larger approved areas would give licensees greater freedom to determine where to locate their studios and make their content, and that this flexibility would enable radio groups which own multiple licences in the same region to put more resources into programme making and less into the "bricks and mortar" costs of maintaining separate local studios". In this respect both nations would appear to have been treated inequitably as this statement runs counter to Ofcom's decision to re-consult on maintaining, not reducing, the number of approved areas in Scotland and Wales.

Whilst we acknowledge the point made that Edinburgh and Glasgow are culturally different, this argument easily applies to Liverpool and Manchester or Bristol and Exeter. As we've said previously, stations have a commercial imperative to provide content that audiences want to listen to, wherever they are based.

Ofcom's Advisory Board for Wales was supportive of one area for Wales and welcomed the recognition of Wales as a unified territory. The National Assembly for Wales was concerned by the prospect of job losses as a result of reducing the approved area as well as the potential reduction in Welsh language content, something that is protected in our case, by our station format.

We do not believe that the linguistic or cultural arguments made apply any more to regions of Scotland and Wales than they do across the new larger approved areas in England and therefore would support each nation having one approved area.

It is entirely appropriate to allow stations, wherever they are based, to make efficiencies and determine how best to deliver services at a local level themselves. This is no different in England than it is in Scotland or Wales. By limiting the size of the areas in those countries, you are limiting broadcaster's ability to be flexible in how they best deliver for their audiences.