

## Your response

Question	Don't agree
	<p>Confidential? – / N</p> <p>Do you agree that for the purposes of where locally-made programming may come from, Ofcom should approve the 'South of England (Bauer)' area in relation to the 12 local licences listed in Section 2 of this document? If you do not agree, please give reasons.</p> <p>I don't agree as Bauer have already made their intentions clear on what they intend to do with these stations and it is not within the spirit of enabling Bauer to continue to deliver any meaningful local service.</p> <p>OFCOM have already said that what matters is what comes 'out the speakers' rather than where the studio is physically located. I agree with this however this change will (as Bauer have already stated by announcing their rebrand to GHR) enable Bauer to change drastically to what comes out the speakers – and in the case of stations that are local in all aspects today ) like Spire FM this change will effectively amount to a station closure and change in character of service.</p> <p>Looking at the reason OFSTED is minded to approve you have said "Our preliminary view is based upon the fact that: • The proposed new approved area more closely matches ITV's 'Meridian' region and is therefore consistent with our general approach of approved areas broadly matching ITV regions. • <b>We accept Bauer's argument that there are some common listener affinities along the south coast of England (for example, between the coastal areas of Hampshire and Sussex).</b>"</p> <p>So if there is such an affinity between these two areas why have Bauer announced a decision not to merge their largest station in coastal Hampshire (Wave 105) with Spirit or Spire FM or Wessex FM. This would appear to make more sense. Instead they have chosen for 20 hours of the day and all weekend to</p>

'effectively' merge content with the GHR national content coming out of Manchester. Is this in spirit or aligned with the argument OFSTED is giving ? Furthermore many of the stations impacted here are providing today a 100% local service whether you consider programming source, programming content (competitions, audience interaction, adverts, news , travel, community feel etc). Consider for a moment the effort by Spire FM during last years poisoning. Look at the content on their social media ? If Spire as a stick of rock it would say Salisbury right through the middle.

This proposed change is not the same as when the pre-decessor stations to Heart rebranded. The reality is those stations had already moved to minimal local programming and so the change was merely in name. In contrast by approving this change Bauer have already said what this will enable them to do. They will remove all 'local' programming (and in many cases these stations are very local). They will at best provide one major regional 4 hour show, the playlist will change radically and the commitment to local news, weather and travel has not been detailed. They argue this amounts to the stations not closing.

These changes are not wanted by audiences and there is no evidence they have been requested by advertisers (most on Spire FM being local businesses). Furthermore the changes amount to effective closure and replacement with a service that exists today on multiple platforms within almost all areas within this region.

This change is a nonsense and shows how much of a failure radio regulation has become. There is clearly a demand for a local service in Salisbury (proven by the fact it is in phase 1 for the local DAB licenses). There is no demand for the loss of an existing profitable service.