

## Your response

Question	Your response
<p><b>Question 1:</b> We consider that the launch of the four DAB+ music stations and the extension of broadcast hours for BBC 5 Sports Extra are material changes. If you disagree, please explain why you consider the BBC's published proposals are not material.</p>	<p>Confidential? – N</p> <p>We concur with Ofcom's assessment that the launch of the four DAB+ music stations and the extension of broadcast hours for BBC 5 Sports Extra constitute material changes. These proposals significantly impact the UK's media landscape due to their potential effects on public value, market competition, and the strategic focus of the BBC's public service remit.</p> <p><b>Reasons Supporting Materiality</b></p> <ol style="list-style-type: none"><li><b>1. Creation of New Public Services:</b> The introduction of four new DAB+ music stations represents a substantive expansion of the BBC's services. By targeting specific genres and audience segments, these new offerings constitute a material shift in the BBC's focus, requiring evaluation under its public service obligations.</li><li><b>2. Impact on Market Competition:</b> The proposed stations overlap significantly with existing commercial offerings, such as dance, classical, and pop music formats. This creates a risk of market distortion by leveraging public funds to compete in areas already well-served by private broadcasters.</li><li><b>3. Changes to Existing Services:</b> The extension of broadcasting hours for BBC 5 Sports Extra fundamentally alters its operational remit, transforming it from a part-time to an extended-hours service. This change could affect listener behaviour and competition within the sports broadcasting market, particularly with talkSPORT.</li><li><b>4. Public Value Concerns:</b> The proposals raise questions about the distinctiveness and innovation expected of the BBC. By mimicking commercially viable formats, these changes may dilute the BBC's unique role in</li></ol>

	<p>providing content that commercial providers are unlikely to produce.</p> <p><b>5. Potential Impact on Local Broadcasting:</b></p> <p>Expanding national services risks diverting resources from local radio, which plays a critical role in reflecting regional diversity and supporting local democracy. This shift undermines the BBC’s ability to address the needs of geographically underserved and diverse communities.</p> <p><b>Conclusion</b></p> <p>The proposals are material because they introduce new services, reshape existing ones, and have a measurable impact on competition and public value. However, Better Media urges Ofcom to evaluate these proposals against the BBC’s broader public service obligations, prioritising investments in local and community-focused services over generic national expansions.</p> <p>This assessment highlights the need for careful consideration to ensure that any material changes align with the BBC’s mission to serve the public interest distinctively and inclusively.</p>
<p><b>Question 2:</b> Do you consider that the BBC’s published proposals are clear in relation to their scale (both in terms of financial resource and in terms of reach and type of content) and the timescales for implementation? If not, please provide details of the areas where you feel more clarity is required.</p>	<p>Confidential? – N</p> <p>We find that the BBC’s published proposals lack sufficient clarity in relation to their scale, including the allocation of financial resources, anticipated reach, and the specifics of content and implementation timelines. Greater transparency is essential to assess the proposals’ alignment with the BBC’s public service obligations and their potential impact on the broader UK media landscape.</p> <p><b>Areas Requiring Greater Clarity</b></p> <p><b>1. Financial Resource Allocation:</b></p> <p>The proposals provide limited information on the budgetary implications of launching and sustaining the four new DAB+ stations and extending Radio 5 Sports Extra’s broadcasting hours. It is unclear:</p>

	<p>How these services will be funded without adversely impacting other BBC services, particularly BBC Local Radio.</p> <p>Whether the proposals include new funding or a reallocation of existing resources, potentially leading to cuts elsewhere.</p> <p><b>2. Audience Reach and Demographics:</b></p> <p>The proposals lack specificity about the targeted reach of the new stations and their ability to attract underserved or new audiences. For example:</p> <p>How will these stations address gaps in public service provision rather than duplicating content already available commercially?</p> <p>What audience growth is projected, and how will success be measured?</p> <p><b>3. Type of Content and Differentiation:</b></p> <p>The descriptions of the stations’ content remain vague, with broad references to genres like “dance” and “anthems.” Questions remain about:</p> <p>How this content will differ from existing commercial and BBC offerings.</p> <p>What editorial strategies will ensure the distinctiveness required under the BBC’s public service remit.</p> <p><b>4. Implementation Timelines:</b></p> <p>While the BBC provides general timelines, there is insufficient detail regarding the phased rollout of these services. Key questions include:</p> <p>How the BBC plans to sequence the launch of the stations to minimise disruption to existing services.</p> <p>Whether any pilot phases or audience testing will be conducted before full implementation.</p> <p><b>Recommendation for Greater Transparency</b></p> <p>Better Media strongly recommends that the BBC provide detailed information on:</p>
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	<p><b>Budgetary Impacts:</b> Including a breakdown of costs and assurances that these changes will not detract from local or underserved services.</p> <p><b>Audience Objectives:</b> Clearly defined metrics for reach and engagement, with a focus on demonstrating added public value.</p> <p><b>Editorial Distinctiveness:</b> Specific commitments to content innovation and differentiation.</p> <p><b>Implementation Plans:</b> Detailed timelines, including provisions for stakeholder feedback during the rollout process.</p> <p><b>Conclusion</b></p> <p>The lack of clarity around these critical aspects undermines the ability of stakeholders and regulators to fully assess the proposals. Greater transparency is needed to ensure that these services deliver meaningful public value without compromising the BBC’s existing commitments to local and community-focused broadcasting.</p>
<p><b>Question 3:</b> Did the BBC’s PIT consultation processes provide suitable opportunity for you to set out your views fully? If not, please provide details.</p>	<p>Confidential? – N</p> <p>We believe the BBC’s Public Interest Test (PIT) consultation processes offered an opportunity for stakeholders to express their views. However, the scope and structure of the process limited the ability to provide a fully informed and impactful response. Several areas could be improved to ensure more inclusive and comprehensive engagement in future consultations.</p> <p><b>Strengths of the PIT Consultation Process</b></p> <ol style="list-style-type: none"> <li><b>1. Access to Information:</b></li> </ol> <p>The consultation process made the BBC’s proposals available for review, allowing stakeholders to understand the general scope of the planned changes.</p> <ol style="list-style-type: none"> <li><b>2. Opportunity for Stakeholder Input:</b></li> </ol> <p>Stakeholders were invited to provide feedback on the proposals, which is essential for public accountability.</p>

## **Limitations of the PIT Consultation Process**

### **1. Lack of Specificity in Proposals:**

The information provided in the PIT was often too general, limiting stakeholders' ability to evaluate the proposals in depth. For example:

Financial details were insufficient, particularly regarding the reallocation of resources and their potential impact on existing services.

Content strategies and audience reach goals lacked clarity, making it challenging to assess whether the proposals align with the BBC's public service remit.

### **2. Insufficient Engagement with Community Media:**

The consultation process did not adequately reach or engage grassroots media organisations or local community stakeholders. These groups are crucial in understanding how the proposals might affect regional and local audiences.

### **3. Limited Channels for Feedback:**

While written responses were invited, the process could have benefited from more interactive forms of engagement, such as public forums, workshops, or online webinars. These would allow stakeholders to discuss the proposals more dynamically and collaboratively.

### **4. Narrow Focus of the Consultation Questions:**

The PIT consultation focused heavily on justifying the materiality and public value of the proposals. Broader issues, such as the implications for local democracy, market saturation, and resource prioritisation, were not sufficiently addressed.

## **Recommendations for Future Consultations**

To improve the efficacy and inclusivity of the PIT consultation process, Better Media recommends:

	<p><b>Providing More Detailed Proposals:</b> Ensure stakeholders have access to specific and actionable information, particularly regarding financial, operational, and audience impact.</p> <p><b>Expanding Engagement Channels:</b> Introduce interactive methods for feedback, such as town halls or digital events, to foster more diverse and inclusive participation.</p> <p><b>Enhancing Outreach to Local and Community Media:</b> Actively involve grassroots organisations in the consultation to ensure their perspectives are considered.</p> <p><b>Broadening the Scope of Questions:</b> Include a wider range of topics that address the potential impact on underserved audiences, local journalism, and the overall media landscape.</p> <p><b>Conclusion</b></p> <p>While the BBC’s PIT consultation process provided a basic framework for stakeholder feedback, its limitations in detail, engagement, and inclusivity hindered a fully comprehensive response. Better Media urges Ofcom to encourage the BBC to adopt more robust consultation practices that foster deeper dialogue and allow stakeholders to evaluate proposals more effectively.</p>
<p><b>Question 4:</b> Given that both proposals raise a number of contentious issues, it is our intention to undertake full BCAs for both. If you disagree and think that Ofcom should undertake Shorter Assessments, please explain why.</p>	<p>Confidential? – N</p> <p>We fully support Ofcom’s intention to undertake full BBC Competition Assessments (BCAs) for both the launch of the four DAB+ music stations and the extension of Radio 5 Sports Extra’s broadcasting hours. Given the significant and potentially far-reaching implications of these proposals, a comprehensive evaluation is necessary to ensure that they align with the BBC’s public service obligations and do not unduly disrupt the broader UK media ecosystem.</p> <p><b>Reasons Supporting Full BCAs</b></p> <p>1. <b>Complex and Wide-Ranging Impact:</b></p>

	<p>The proposals raise significant issues related to market competition, public value, and resource allocation, which cannot be adequately addressed through a Shorter Assessment. Specifically:</p> <p>The overlap between the proposed DAB+ stations and existing commercial offerings raises concerns about market distortion.</p> <p>The potential diversion of resources from BBC Local Radio and other place-based services requires a detailed evaluation of the impact on local and underserved audiences.</p> <p><b>2. Potential Market Disruption:</b></p> <p>The BBC’s proposals risk creating unfair competition in the digital and sports radio markets by leveraging public funding to offer services that mimic commercially available formats. This requires a thorough analysis of:</p> <p>The proposals’ effect on the sustainability of commercial operators.</p> <p>The BBC’s role in fostering a diverse and competitive media landscape.</p> <p><b>3. Public Value Considerations:</b></p> <p>A full BCA is necessary to examine whether the proposals deliver sufficient public value, particularly given the generic nature of the content described. Critical questions include:</p> <p>Are these proposals filling gaps in public service provision, or are they duplicating existing commercial content?</p> <p>Do the proposals adequately address the needs of underserved audiences, such as rural and older listeners?</p> <p><b>4. Contentious Issues and Stakeholder Concerns:</b></p> <p>The proposals have elicited strong responses from various stakeholders, including concerns about:</p>
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	<p>The erosion of local journalism and its impact on local democracy.</p> <p>The focus on national rather than place-specific content.</p> <p>The BBC’s priorities in allocating its resources.</p> <p>A full BCA will provide the necessary framework to evaluate these contentious issues and incorporate stakeholder feedback.</p> <p><b>Risks of a Shorter Assessment</b></p> <p>A Shorter Assessment would not provide the depth of analysis required to:</p> <p>Evaluate the long-term implications of these proposals on the BBC’s public service remit.</p> <p>Assess the broader impact on the UK media landscape, particularly for community and local media.</p> <p>Address concerns about fairness and competition comprehensively.</p> <p><b>Recommendation</b></p> <p>Better Media urges Ofcom to proceed with full BCAs for both proposals. This approach will ensure that all relevant factors are considered, and that the proposals are evaluated rigorously against the BBC’s obligations to deliver distinctive, inclusive, and impactful public service content.</p> <p><b>Conclusion</b></p> <p>Given the contentious and complex nature of these proposals, full BCAs are essential to safeguard the public interest, protect market diversity, and ensure that the BBC’s services align with its public service mandate.</p>
<p><b>Question 5:</b> Do you agree with the BBC’s assessments in its PITs about the potential public value and/or market impact of the proposals? Are there any additional public value and/or competition considerations that have not been identified by the BBC?</p>	<p>Confidential? – N</p> <p>We do not fully agree with the BBC’s assessments in its Public Interest Tests (PITs) regarding the potential public value and market impact of its proposals. While the BBC has highlighted some public value objectives, the assessments</p>



lack sufficient depth and fail to address critical considerations about the broader implications for the UK media landscape, including competition, underserved audiences, and resource prioritisation.

**Areas of Agreement with the BBC's PIT Assessments**

**1. Adapting to Changing Listener Habits:**

We agree that the BBC must evolve its services to reflect changing listener habits, including the increasing adoption of digital platforms.

The ambition to target younger audiences and provide a broader range of music genres aligns with the need to attract and retain diverse audiences.

**2. Public Access to Sports Content:**

Extending Radio 5 Sports Extra's hours could enhance public access to sports-related content, particularly for audiences seeking non-live sports programming.

**Areas Where the BBC's Assessments Fall Short**

**1. Limited Public Value Distinctiveness:**

The proposed DAB+ stations lack originality and distinctiveness, with their focus on generic music genres (dance, anthems, classical unwind) that are already well-served by commercial broadcasters and streaming platforms.

The BBC's PIT does not adequately demonstrate how these stations will deliver content that is uniquely aligned with its public service remit, such as innovative, underserved, or locally relevant programming.

**2. Neglect of Underserved Audiences:**

The BBC's PIT does not sufficiently address the needs of rural, older, or economically disadvantaged audiences, who may struggle to access digital services or feel excluded by the focus on younger demographics.

	<p>Public value would be better achieved by investing in local and community-focused content that addresses the unique challenges of these groups.</p> <p><b>3. Overlooking Local Radio Impact:</b></p> <p>The BBC’s assessments do not fully consider the potential negative impact of diverting resources from BBC Local Radio, a critical provider of hyper-local news and community engagement.</p> <p>Expanding national services risks further marginalising place-based content, which is vital for supporting local democracy and fostering regional identities.</p> <p><b>4. Market Competition Concerns:</b></p> <p>The PIT underestimates the risk of market distortion, particularly for commercial broadcasters that serve similar audience segments or genres.</p> <p>By using public funding to compete in areas already dominated by commercial operators, the BBC could inadvertently weaken the sustainability of private media outlets, reducing overall market diversity.</p> <p><b>5. Missed Opportunities for Innovation:</b></p> <p>The BBC’s PIT lacks a clear strategy for integrating innovative approaches to content delivery, such as leveraging partnerships with community media or creating interactive, participatory programming.</p> <p>Greater emphasis on place-specific innovation could enhance the distinctiveness and public value of the BBC’s offerings.</p> <p><b>Additional Public Value and Competition Considerations</b></p> <p><b>1. Impact on Local Democracy:</b></p> <p>The shift towards national services risks reducing the BBC’s role in supporting local governance, public accountability, and civic engagement.</p> <p><b>2. Digital Exclusion Risks:</b></p>
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	<p>The proposals fail to account for the digital divide, which could marginalise audiences without</p>
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	<p>reliable access to digital platforms or DAB-enabled devices.</p> <p><b>3. Cultural Diversity and Regional Identity:</b></p> <p>Nationally focused services may erode the BBC’s ability to amplify the diverse voices and cultures that define the UK’s regions and nations.</p> <p><b>Recommendations for Improvement</b></p> <p>To address these shortcomings, Better Media recommends that the BBC:</p> <p>Prioritise content that is genuinely distinctive, underserved, and aligned with its public service remit.</p> <p>Reinvest in local radio and place-specific content to strengthen regional engagement and diversity.</p> <p>Conduct a more thorough analysis of market competition risks, particularly for commercial operators and community media.</p> <p>Develop strategies to bridge the digital divide and ensure that all audiences can access its services equitably.</p> <p><b>Conclusion</b></p> <p>The BBC’s PIT assessments fall short in addressing the full scope of public value and market impact considerations. While the proposals have potential, they require significant refinement to ensure they meet the BBC’s obligations to provide unique, inclusive, and impactful public service content. Better Media urges Ofcom to hold the BBC accountable for these shortcomings and to advocate for a more balanced and locally focused approach.</p>
<p><b>Question 6:</b> Do these proposals lead to any significant market impact concerns which might affect your own services? If so, please explain how the BBC’s proposals would affect your services if they go ahead.</p>	<p>Confidential? – N</p> <p>We believe the BBC’s proposals for new DAB+ radio stations and extended broadcasting hours for Radio 5 Sports Extra raise significant market impact concerns. While Better Media itself does not provide direct broadcasting services, we</p>

work closely with community media organisations and independent broadcasters, which are highly susceptible to the effects of these proposals. These changes risk exacerbating existing market challenges for smaller and independent media outlets, particularly in terms of competition, audience fragmentation, and resource allocation.

**Market Impact Concerns**

**1. Increased Competition in Overcrowded Genres:**

The proposed DAB+ stations target music genres such as dance, classical unwind, and anthems, which are already saturated by commercial broadcasters and streaming services.

This increased competition, supported by public funding, risks crowding out smaller commercial or community stations that operate in niche markets or rely on local audience loyalty.

**2. Audience Fragmentation:**

By introducing additional national services, the BBC may draw audiences away from independent and community broadcasters, which depend heavily on local engagement and focused listener bases to sustain their operations.

Community media outlets often serve as the sole voice for hyper-local content, and any reduction in their listener share could lead to diminished impact and viability.

**3. Undermining Local Media Ecosystems:**

The proposals redirect resources towards national-level programming, potentially weakening support for BBC Local Radio and other placebased services.

This shift could undermine the broader media ecosystem by reducing collaboration opportunities and financial investment in grassroots media initiatives.

**4. Digital Inequality and Access Barriers:**

Community media often caters to demographics that may not have access to DAB+ or digital streaming platforms, including older listeners, rural audiences, and economically disadvantaged groups.

The expansion of digital-first services risks alienating these populations and could diminish the relevance of community broadcasters who currently serve them effectively.

#### **5. Market Distortion:**

The use of public funds to compete directly with commercial broadcasters creates an uneven playing field. This is particularly concerning for smaller independent operators that lack the resources to match the scale or reach of the BBC's offerings.

#### **Impact on Better Media's Advocacy Work**

These proposals could affect Better Media's members ability to support community broadcasters and advocate for a diverse, pluralistic media landscape by:

**Diverting Attention from Local Issues:** The expansion of national services could marginalise local concerns, reducing the platform available for community-focused storytelling and engagement.

**Reducing Opportunities for Collaboration:** Smaller broadcasters and community organisations may find it harder to partner with the BBC if resources are concentrated on national projects.

**Eroding Public Trust in Media Diversity:** The perception of an increasingly centralised and commercially focused BBC could weaken public support for alternative and independent media models.

#### **Recommendations for Mitigating Market Impact**

To address these concerns, Better Media recommends that the BBC:

	<p><b>Invest in Local Partnerships:</b> Actively collaborate with community and independent broadcasters to ensure that national expansions do not diminish the vitality of local media.</p> <p><b>Prioritise Distinctive Content:</b> Focus on delivering unique programming that does not replicate existing commercial offerings, reducing direct competition.</p> <p><b>Support Accessibility Initiatives:</b> Ensure that underserved audiences are not excluded from accessing new services due to digital or financial barriers.</p> <p><b>Maintain and Enhance Local Radio:</b> Reinforce its commitment to place-based content and local radio services to preserve the diversity of the UK media landscape.</p> <p><b>Conclusion</b></p> <p>The BBC’s proposals have the potential to disrupt the fragile balance of the UK’s media market, particularly for smaller broadcasters and community media organisations. While these services may offer certain public value benefits, they must be carefully implemented to avoid undermining the plurality and diversity that are essential to a healthy media ecosystem. Better Media urges Ofcom to ensure that these market impacts are fully evaluated and mitigated.</p>
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## **Better Media - BBC DAB Services Consultation Response to Ofcom**

Monday, 02 December 2024

### **Introduction and Context**

Better Media is a members-based organisation dedicated to fostering a more diverse, democratic, and accountable media landscape. We seek to address issues stemming from concentrated media ownership, including corruption, hate speech, and misinformation. Better Media aims to build a large-scale, democratic membership to organise, fund, and support campaigns for media reform in the UK. Our guiding principles are encapsulated in the motto: "Be the Media, Know the Media, Change the Media." Through these efforts, Better Media strives to create a media environment that accurately reflects the UK's diverse society and upholds democratic values.

Here is the Better Media response to Ofcom's consultation on the BBC's proposal to launch new DAB+ radio stations and extend the broadcasting hours of Radio 5 Sports Extra. While we acknowledge the BBC's intent to adapt its services to evolving listener habits, we believe the current proposals represent a missed opportunity to fulfil the BBC's public service remit more effectively.

Rather than prioritising generic content formats that replicate existing commercial offerings, we believe that the BBC should focus on strengthening place-based content that fosters community engagement and reflects the diverse identities of the UK. At a time when local journalism and community broadcasting face mounting pressures, we strongly advocate for a reinvestment in BBC Local Radio, with an expanded social remit designed to engage audiences based on their geographic location and local needs, rather than through segmented cultural niches.

This response outlines key areas of concern and recommendations for how the BBC can better serve its audiences and deliver genuine public value through a commitment to placebased focused, socially impactful broadcasting. We hope this submission will encourage Ofcom to require the BBC to re-evaluate its proposals and prioritise investment in services that resonate with local audiences, support democracy, and differentiate the BBC from commercial broadcasters.

### **Generic Content vs. Place-Based Content**

One of the primary concerns with the BBC's proposed new DAB+ services is their focus on generic, genre-based formats, which risks neglecting the unique role the BBC plays in serving diverse local communities. While music-focused and culturally segmented content has a place within a broad media landscape, the BBC's public service mission requires a more distinctive approach that prioritises content rooted in place and community.



**The Value of Place-Based Content:** Local radio has long been a cornerstone of the BBC's ability to connect with audiences in a meaningful way. By reflecting local culture, dialects, and stories, BBC Local Radio fosters a sense of identity and belonging that is unparalleled by national or commercial alternatives. Expanding place-based content would allow the BBC to address the specific needs and interests of communities across the UK, particularly in regions that feel underserved or overlooked.

**Risks of Generic Offerings:** The proposed DAB+ services replicate formats already well served by commercial radio, offering little differentiation to justify the investment of public funds. For instance:

- **Music Genres:** Commercial broadcasters already cater extensively to the genres targeted by the BBC's proposals, such as dance, anthems, and classical unwind.
- **Audience Overlap:** Younger audiences, the stated target of some new stations, are already well served by streaming platforms and commercial alternatives, making these offerings redundant and less likely to attract significant listenership.
- This approach risks diluting the BBC's distinctive public service ethos, offering content that is indistinguishable from commercially motivated media, and potentially undermining the broader value of the licence fee.

**Recommendation:**

We urge Ofcom to guide the BBC toward prioritising the reinforcement of place-based content. By doing so, the BBC can fulfil its mission to serve all audiences, offering a unique and meaningful service that reflects the diversity of local communities and regions. This would not only enhance public value, but would also ensure that the BBC remains a trusted and indispensable resource for the UK population.

**Reinvestment in BBC Local Radio**

BBC Local Radio has been a vital component of the BBC's public service offering, providing a trusted platform for place-based news, community engagement, and cultural expression. However, the current proposals to expand national DAB+ services risk diverting resources away from this critical function, further marginalising place-specific content at a time when it is most needed.

**Importance of Local Radio:** Local radio provides unparalleled benefits in its ability to:

- **Support Democracy:** By covering council meetings, elections, and local governance, local radio ensures that citizens remain informed and engaged with the democratic process.
- **Reflect Regional Diversity:** Local radio captures the unique dialects, traditions, and perspectives of the UK's diverse regions, strengthening the cultural fabric of the nation.
- **Engage Communities:** By addressing hyper-local issues and featuring community voices, local radio builds trust and fosters a sense of belonging.

**Current Challenges:** Recent reductions in BBC Local Radio services have already diminished its capacity to deliver these benefits. Shared programming across regions, reduced local news coverage, and centralisation of content production undermine the BBC's ability to serve local audiences effectively. This is particularly concerning in rural and economically disadvantaged areas, where local radio often provides the only reliable source of relevant information.

- **Missed Opportunity:** Rather than launching generic DAB+ services, the BBC should reinvest in local radio to:
- **Expand Programming:** Increase the availability of locally produced, location-specific content that addresses the unique needs and interests of individual communities.
- **Strengthen News Coverage:** Bolster local journalism to ensure comprehensive coverage of regional and local affairs.
- **Foster Partnerships:** Collaborate with community media and local organisations to amplify diverse voices and stories.

We urge Ofcom to direct the BBC to channel its resources into revitalis-

**Recommendation:**

ing and expanding BBC Local Radio. This reinvestment would not only enhance public value but also strengthen the BBC's role as a guardian of local democracy and culture, ensuring it remains relevant and indispensable to communities across the UK.

**A Wider Social Remit for BBC Local Radio**

In addition to reinvestment, BBC Local Radio should be tasked with a broader social remit to better serve audiences across the UK. Rather than narrowly targeting specific demographic or cultural segments, BBC Local Radio should adopt a mission that reflects the diversity of its audience on the basis of shared geography, fostering connections between communities and enhancing civic participation.

**Engaging Audiences Through Location-Based Strategies:** Audiences are best served when programming is rooted in the specific context of their location. This approach allows BBC Local Radio to:

- **Bridge Divides:** Create content that resonates across different ages, socio-economic groups, and cultural identities within a geographic area.
- **Encourage Civic Engagement:** Act as a platform for discussions on local issues, events, and policies that directly affect residents.
- **Empower Communities:** Amplify voices from marginalised or less represented groups, ensuring inclusivity in the public conversation.

**Moving Beyond Cultural Segmentation:** The current trend toward segmenting audiences by lifestyle or cultural preferences risks excluding those who do not fit neatly into such categories. Instead, a location-based model allows for:

- **Greater Relevance:** Content tailored to the lived experiences and shared concerns of local communities.
- **Increased Cohesion:** Programming that brings together audiences from diverse backgrounds around shared local interests.

**Examples of a Broader Remit:** A socially engaged BBC Local Radio could:

- **Partner with Local Organisations:** Work with schools, charities, and community groups to deliver educational and socially impactful content.
- **Promote Local Arts and Culture:** Showcase the creative talent of each region, from local music to grassroots theatre.
- **Support Crisis Response:** Serve as a critical information hub during local emergencies or public health crises.

### **Recommendation:**

Rather than launch new national DAB services, we encourage Ofcom to require the BBC to extend the remit of its local radio services to encompass a wider social purpose. This would not only enhance the public value of these services but also ensure they remain a vital resource for fostering stronger, more connected communities across the UK.

### **Public Value and Licence Fee Justification**

The BBC's unique funding model through the licence fee obliges it to deliver distinctive public value that justifies its privileged position within the UK's media landscape. The current proposals for new DAB+ services fall short of this obligation, offering content that risks duplication of commercial offerings and neglecting the BBC's core responsibility to provide services that are innovative, inclusive, and aligned with the public interest.

**The Public Service Mandate:** As a publicly funded institution, the BBC must demonstrate that its initiatives:

- **Serve All Audiences:** Provide value to diverse demographic and geographic groups, including underserved populations.
- **Promote Distinctiveness:** Deliver content that cannot be readily accessed through commercial providers, ensuring a clear differentiation between public and private broadcasting.
- **Advance Cultural and Democratic Goals:** Support the UK's democratic processes, cultural heritage, and social cohesion through its programming.

**Concerns with the Current Proposals:** The proposed DAB+ stations focus on generic music formats and narrowly targeted cultural niches that:

- **Overlap with Commercial Offerings:** The genres and audience segments targeted by these new services are already well served by commercial broadcasters and streaming platforms.
- **Neglect Underserved Groups:** There is little evidence that these services address the needs of audiences in rural areas, older listeners, or those without reliable access to digital platforms.
- **Fail to Add Unique Public Value:** The proposals lack the innovation and distinctiveness expected of a publicly funded broadcaster.

**A More Impactful Use of Resources:** To truly deliver on its public service remit, the BBC should:

**Recommendation:**

- **Invest in Local Content:** Redirect resources to services that reflect the specific needs and interests of local communities.

**Focus on Underserved Audiences:** Prioritise content for demographics that are overlooked by commercial broadcasters, including older listeners and those in socio-economically disadvantaged areas.

- **Leverage Digital Innovation for Public Good:** While digital platforms are critical for future growth, they should be used to enhance access to and engagement with distinctive public service content, not to replicate commercial offerings.

**Recommendation:** We urge Ofcom to hold the BBC accountable for delivering genuine public value through its services, rather than expanding these services and diluting the existing provision. This means requiring the BBC to reconsider its proposals and align them more closely with its public service mandate, ensuring that licence fee payers receive content that is both distinctive and inclusive.

### **Impact on Local Democracy and Accountability**

Local democracy relies on an informed public, and local radio has historically been one of the most effective tools for keeping communities engaged with regional governance, public services, and community issues. The BBC's proposals to expand generic, nationally focused DAB+ stations risk further eroding this crucial function by diverting resources away from the BBC's already diminished local radio services.

**The Role of Local Radio in Supporting Democracy:** BBC Local Radio has played a vital role in strengthening local democracy by:

- **Providing Transparency:** Covering council meetings, local elections, and public consultations, ensuring that governance processes are accessible to the public.
- **Highlighting Local Issues:** Giving a platform to community concerns and ensuring they are heard by decision-makers.
- **Fostering Civic Engagement:** Encouraging listeners to participate in community life through events, debates, and local initiatives.
- **Erosion of Local Journalism:** Recent reductions in local programming and staff cuts within BBC Local Radio have already weakened the ability of these services to support local democracy. If the BBC continues to deprioritise local content in favour of national or generic services, the consequences could include:
  - **Reduced Accountability:** A lack of media scrutiny on local councils and public bodies could result in less transparent governance.
  - **Less Informed Communities:** Audiences would miss out on vital information about local policies, services, and events.
  - **Disconnection from Decision-Making:** Citizens in rural or underrepresented areas could feel further alienated from political and social processes.

**The Need for Enhanced Local Focus:** To counter these trends and strengthen its democratic function, the BBC should:

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- **Expand Local Coverage:** Ensure that all BBC Local Radio stations have the resources to provide comprehensive, original reporting on local governance and public services.
- **Encourage Community Participation:** Use its platforms to host public discussions, debates, and forums on local issues, fostering a stronger connection between audiences and decision-makers.
- **Collaborate with Local Organisations:** Partner with local media, charities, and community groups to deepen its engagement with regional and local audiences.

**Recommendation:** We strongly encourage Ofcom to prioritise the democratic role of BBC Local Radio in its assessment of the BBC’s proposals. More national DAB services will not fulfil this role. This means advocating for a reinvestment in local journalism and programming, which is essential for maintaining the health of local democracy and ensuring that all citizens have access to relevant and reliable information about their communities.

### **Market Saturation and Redundancy**

The BBC’s proposal to launch additional DAB+ stations risks exacerbating market saturation by introducing services that closely mimic existing commercial offerings. Rather than complementing the broader UK radio landscape, these proposals could crowd out commercial operators while failing to add significant public value.

- **Overlap with Commercial Offerings:** The genres and formats proposed for the new stations, such as dance music, anthems, and classical unwind, are already well served by commercial broadcasters and streaming platforms. Key issues include:
- **Imitation of Successful Formats:** The BBC’s proposed stations replicate content that is already available through commercial providers, undermining the BBC’s duty to deliver distinctive public service content.
- **Potential Market Disruption:** By leveraging its publicly funded resources to compete directly with commercial broadcasters, the BBC risks distorting the competitive landscape, particularly in the already crowded digital radio sector.
- **Inefficient Use of Public Resources:** The focus on duplicating commercial formats raises concerns about the effective use of licence fee funding. The BBC should prioritise services that deliver unique value to audiences, particularly those underserved by the commercial sector, rather than competing in areas where the market already provides extensive choice.
- **Recommendations for Addressing Market Concerns:** To avoid redundancy and maximise public benefit, we recommend that the BBC:
  - Focus on Distinctiveness:** Develop content that fills gaps in the existing market, such as hyper-local news, regional music, and culturally diverse programming.
  - Avoid Direct Competition with Commercial Providers:** Concentrate on areas where the BBC’s public service remit provides a clear advantage, such as investigative journalism and community-focused programming.

- **Enhance Collaboration:** Work with commercial and community broadcasters to complement rather than compete with their offerings, fostering a more diverse and sustainable media ecosystem.

**Recommendation:** We urge Ofcom to scrutinise the potential market impact of the BBC’s proposals and ensure that the launch of new services does not disrupt the balance of the UK’s radio landscape. The BBC’s resources should be directed toward areas where it can deliver clear and distinct public value, avoiding unnecessary competition with commercial operators.

### **Diversity of Voices and Preservation of Regional Identity**

The BBC’s role as a public service broadcaster includes fostering a diverse and representative media landscape. However, the proposed DAB+ services, with their national focus and generic content, risk eroding the unique regional identities and voices that are essential to the UK’s cultural fabric.

**The Importance of Diversity in Broadcasting:** Local and regional radio services play a critical role in amplifying the voices of diverse communities. They provide:

- **Regional Perspectives:** Unique insights into local issues, reflecting the concerns and interests of specific areas.
- **Cultural Preservation:** Platforms for local dialects, traditions, and music, which contribute to the richness of the UK’s cultural identity.
- **Representation of Minorities:** Opportunities for underrepresented groups to share their stories and perspectives.
- **Risks of Centralisation and Homogenisation:** The move towards centrally produced, nationally focused DAB+ services undermines this diversity by:
- **Reducing Local Focus:** National programming often overlooks the nuanced needs and stories of regional audiences.
- **Homogenising Content:** A focus on generic genres risks creating a one-size-fits-all model that fails to resonate with local communities.
- **Marginalising Nations and Regions:** Areas such as Scotland, Wales, Northern Ireland, and rural England could see their distinct voices overshadowed by a London-centric or uniform UK-wide narrative.

### **Opportunities for Enhancing Regional Identity**

The BBC has the capacity to strengthen regional broadcasting by:



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- **Investing in Regional Content:** Producing programming that showcases the unique culture, history, and issues of specific areas.
- **Supporting Local Talent:** Providing platforms for emerging artists, writers, and broadcasters from across the UK's nations and regions.
- **Collaborating with Community Media:** Partnering with local media organisations to create more inclusive and representative content.

**Recommendation:** We recommend that Ofcom require the BBC to prioritise the preservation of local place-based identity and diversity of voices within its service portfolio. This means rebalancing its investment towards locally and regionally focused content, ensuring that the BBC remains a trusted and valued institution across all parts of the UK.

### **Innovation in Local Broadcasting**

The BBC's role as a publicly funded broadcaster provides an opportunity to lead innovation in local broadcasting. However, any innovation must prioritise place-specific approaches that respond authentically to the distinct social and cultural identities of local communities. The current trend towards regionalisation or amalgamation of sub-regional areas for administrative convenience risks undermining the integrity and relevance of local services.

- **The Importance of Place-Specific Innovation:** True innovation in local broadcasting should reflect and amplify the unique character of specific places, ensuring that content resonates with the daily lives and priorities of local communities. This involves:
- **Avoiding Regional Amalgamation:** Combining smaller areas into broader regional networks may streamline operations but dilutes the local focus and erodes the distinctiveness of individual communities.
- **Understanding Local Needs:** Innovation should be informed by an in-depth understanding of the socio-economic, cultural, and demographic characteristics of specific locations.
- **Empowering Local Voices:** Programming should reflect the voices and stories of people within a clearly defined place, fostering community connection and pride.

**Current Challenges with Regionalised Approaches:** The BBC's increasing reliance on regional or sub-regional broadcasting models prioritises efficiency over authenticity. This has led to:

- **Loss of Local Identity:** Programming that attempts to cater to broad regional audiences often overlooks the nuances of specific places, resulting in generic content.
- **Reduced Audience Engagement:** Listeners are less likely to connect with content that fails to reflect their unique cultural and geographic context.

**Undermining Public Value:** Regionalised models risk alienating communities and reducing the BBC's ability to serve as a truly inclusive public service broadcaster.

**Opportunities for Place-Specific Innovation:** To ensure that innovation enhances local broadcasting's value, the BBC should:

- **Invest in Hyper-Local Solutions:** Develop bespoke programming and formats tailored to individual communities, reflecting their specific character and needs.
- **Enhance Local Storytelling:** Equip local teams to produce multimedia content that captures the unique stories, traditions, and concerns of specific places.
- **Collaborate with Local Partners:** Work closely with community organisations, schools, and cultural institutions within defined localities to co-create authentic content.

**Recommendation:** We strongly encourage Ofcom to require the BBC to adopt a place-specific approach to innovation. This would ensure that the BBC's local broadcasting remains rooted in the integrity of individual communities, providing content that is relevant, engaging, and reflective of the social and cultural diversity of the UK.

### Summary of Key Recommendations

This consultation response has highlighted critical issues with the BBC's proposals for new DAB+ radio stations and extended services. Our key points and recommendations are as follows:

- **Generic Content vs. Place-Based Content:** The BBC should prioritise place-based content that reflects local communities and cultures rather than focusing on generic formats that duplicate commercial offerings.
- **Reinvestment in BBC Local Radio:** Resources should be redirected to revitalise BBC Local Radio, ensuring it continues to provide hyper-local news, storytelling, and engagement tailored to specific communities.
- **Wider Social Remit:** BBC Local Radio should adopt a broader remit, engaging audiences based on shared geographic location and fostering inclusivity across age, cultural, and socio-economic divides.
- **Public Value and Licence Fee Justification:** The BBC must demonstrate how these proposals provide unique public value and justify the use of licence fee funding, avoiding competition with commercial broadcasters.
- **Impact on Local Democracy and Accountability:** Strengthen the democratic role of BBC Local Radio by expanding coverage of local governance, elections, and public services, ensuring transparency and civic engagement.

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- **Market Saturation and Redundancy:** Avoid duplication of commercial offerings and focus on content that fills gaps in the media landscape, complementing rather than competing with commercial broadcasters.
- **Listener Accessibility and Representation:** Address accessibility challenges by maintaining analogue services, improving digital infrastructure, and serving underserved audiences, including older listeners and rural communities.
- **Diversity of Voices and Regional Identity:** Protect and enhance regional diversity by investing in localised content and resisting centralised or homogenised programming models.
- **Place-Specific Innovation:** Prioritise innovation that is rooted in the specific social and cultural identities of individual communities, avoiding the amalgamation of regions that undermines local integrity.
- **Conclusion:** The BBC occupies a unique position within the UK's media ecosystem, with a responsibility to deliver distinctive, inclusive, and locally relevant content. While the proposed DAB+ services aim to respond to changing listening habits, they fail to address the BBC's core public service mandate.

We urge Ofcom to require the BBC to refocus its efforts on strengthening local broadcasting before introducing new national services, ensuring that its services are rooted in the integrity of individual communities and responsive to the diverse needs of the UK population. By investing in place-specific content and innovative approaches to local engagement, the BBC can maintain its position as a trusted and indispensable public service broadcaster.

Better Media is committed to supporting Ofcom and the BBC in achieving these goals, and we welcome the opportunity to continue contributing to this important discussion. Yours sincerely,

Better Media