

## Request to vary transmission sites – Radio Pembrokeshire

### **PUBLIC VERSION**

*✂ indicates redacted text from confidential version*

### **SUMMARY**

- Haven FM (Pembrokeshire) Limited requests to cease transmission on Radio Pembrokeshire’s infill FM relay sites at Fishguard and Tenby on a date to be agreed in the first half of 2025 – likely during May or June.
- This request is based on technical, commercial, and environmental factors and is made to protect the continuation of a countywide FM service for Radio Pembrokeshire from the existing main site at Haverfordwest.
- Predicted FM coverage loss is minimal (6% of the MCA) and mitigated by the service being available on DAB and online in the same areas.
- Predicted audience loss to the service due to the change is minimal (6% of published RAJAR hours in a worst-case scenario) and can be mitigated by on-air messaging in advance of the change and by the service continuing to be available on DAB and online.
- We have considered several alternative measures before making this request and concluded that this change represents the most certain way to maintain an FM local radio service for Pembrokeshire.
- We believe current Ofcom policy, precedent decisions around turning off AM transmitters, and fast changing platform listening patterns mean that this request should be agreed and remains consistent with the licence condition to serve as much of the licensed area as is for the time being reasonably practical.

### **BACKGROUND**

Radio Pembrokeshire is operated by Haven FM (Pembrokeshire) Limited (“The Company”) and has operated since July 2002.

The Company is a wholly owned subsidiary of Nation Broadcasting Limited (“Nation”), formerly Town and Country Broadcasting Limited.

The Company operates Radio Pembrokeshire (“the station”) and holds the analogue FM licence for Pembrokeshire (AL00272) and a DSPS licence (DP100026) for DAB transmission on the Mid and West Wales local DAB multiplex. The station is also available online at nationplayer.com, the Nation Player mobile app, the UK Radio Portal on Freeview and Freely and streamed devices.

Having funded and supported the business from concept, through licence application, to launch and two decades of successful broadcasting, Nation has ensured that Radio Pembrokeshire has been a reference case of a successful local radio station. It remains one of the few services in UK never to have rebranded.

Following the renewal of the FM licence to 2032, we commenced negotiations *✂* relating to renewing Radio Pembrokeshire’s FM transmission services contract.

✂ a significant amount of re-engineering work will be required to guarantee the continuation of transmissions from the existing sites through the new licence period.

Given that the transmission contract has been in place for many years and in recent years has ✂, and with FM audiences in general decline, we have been unable to reach terms for the renewal ✂.

Unless ✂, we will be left with no commercially viable alternative but to surrender the analogue licence once the current transmission agreement concludes ✂.

With transmission costs now exceeding £✂ per head of population served per year and rising, with FM listening in long term decline, and therefore becoming more expensive per listener, we believe it is prudent to explore options that might be available to reduce ongoing transmission costs to allow the continuation of Radio Pembrokeshire on FM beyond the immediate short term.

Our technical request is the cessation of the relay transmitters operating at Tenby and Fishguard in Summer 2025 which would reduce transmission costs by at least ✂% whilst resulting in only a 6% reduction in audience served by FM and in a worst-case scenario less than 6% of overall audience hours.

This will enable the continuation of the service on FM for most current and potential listeners across the county but it is no longer reasonably practical to serve 100% of the MCA.

Outside of this clear economic case, we believe there are also strong policy reasons why this request should be agreed.

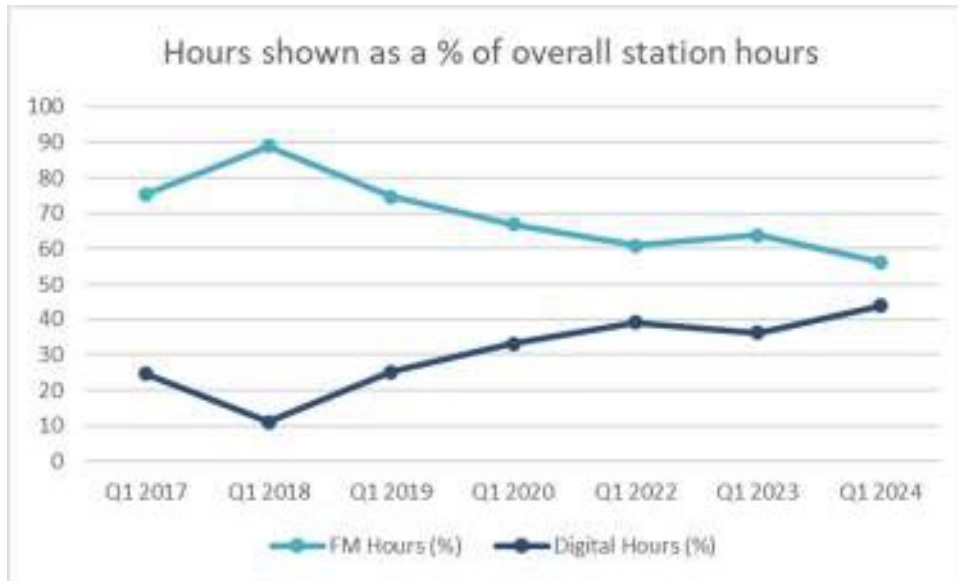
## **EVIDENCE OF GENERAL DECLINE IN FM LISTENING IN THE LICENSED AREA**

The graphs below demonstrate that the proportion of FM reach and hours is declining for Radio Pembrokeshire and for All Radio within the Radio Pembrokeshire area.

The decline is steeper in hours which generally determines ✂.

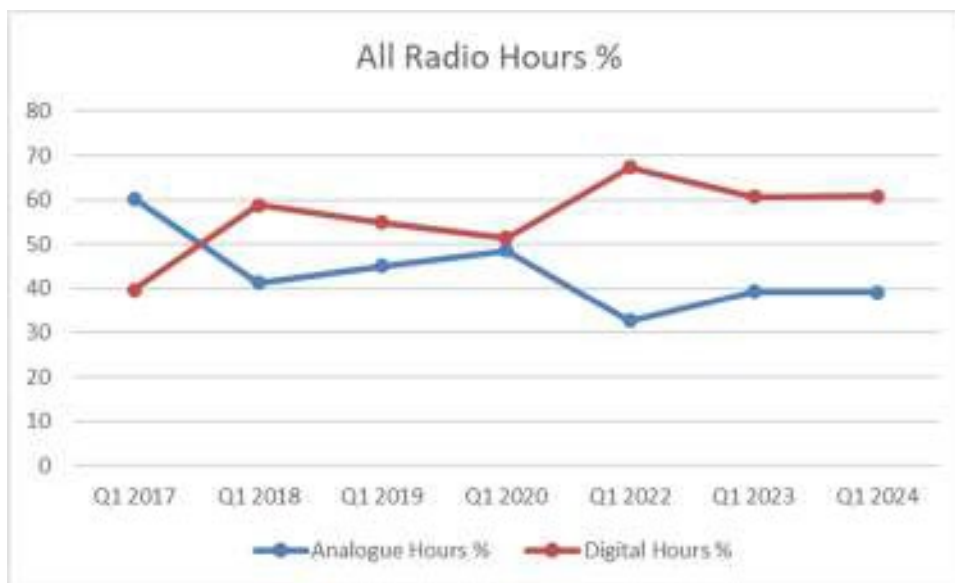
Radio Pembrokeshire still enjoys more audience hours from the FM platform than digital which we suggest is due to the historic availability of the service on FM, the relatively smaller number of services available on the FM platform in the area, for example, in vehicles with no DAB and the relatively later launch of local DAB in the area compared to other areas of the UK.

Nevertheless, there is a clear downward trend of FM listening hours at station level and we would expect that trend to continue with Digital Hours overtaking FM within the next licence period, as is the wider case across the UK and in the Pembrokeshire market overall.



Radio Pembrokeshire TSA - % of Radio Pembrokeshire Hours by platform. RAJAR 12 month reporting period.

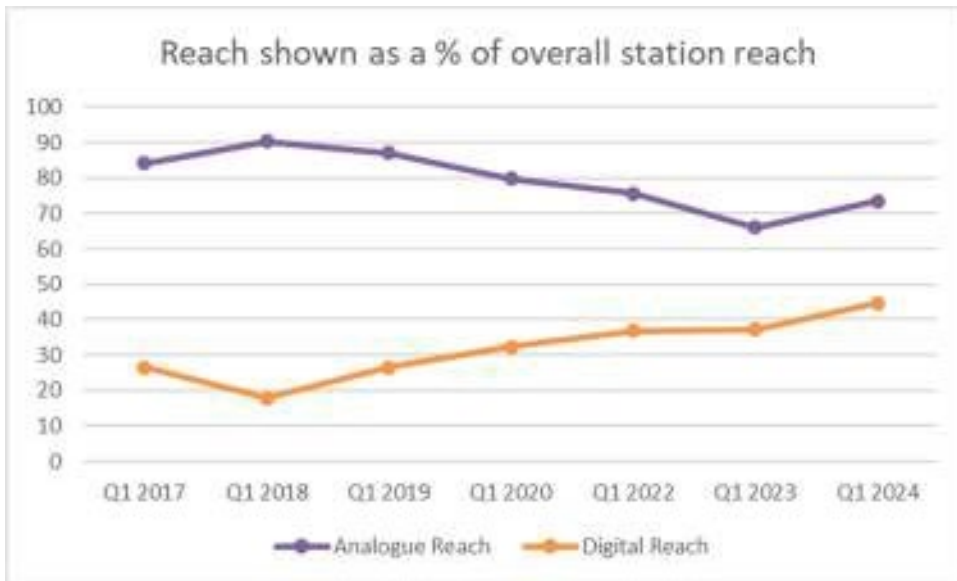
The overall market supports this assertion as the proportion of digital hours have exceeded analogue hours since 2020.



Radio Pembrokeshire TSA - % of All Radio hours by platform. RAJAR 12 month reporting period.

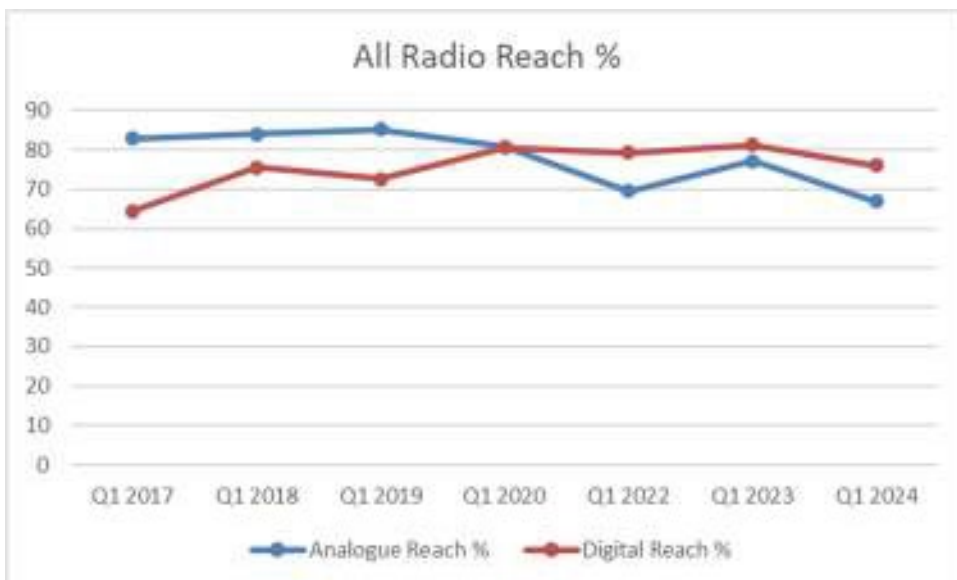
In respect of audience reach there is a broadly similar story – driven, we would suggest by DAB radio becoming more prevalent in-car, alongside the significant growth of smart-speaker listening in recent years.

Please note that as listeners can be counted twice if they listen on both Analogue and Digital platforms, the proportion of published reach in these graphs total to more than 100%.



Radio Pembrookshire TSA - % of Radio Pembrookshire reach by platform. RAJAR 12 month reporting period

Again, the position of All Radio has already seen digital reach exceed analogue.



Radio Pembrookshire TSA - % of All Radio reach by platform. RAJAR 12 month reporting period

Further RAJAR analysis (Q1, 2024) ✂

✂ *Redacted table*

✂

### COMMERCIAL CONSIDERATIONS

This request is set against the following commercial considerations: declining local revenues, declining audiences and increasing costs.

Without action, these factors may make the business model ✂.

For perspective on transmission costs, ✂.

Over time, taking into account RPI increases, ✂ and some re-engineering at Haverfordwest, the current annual contract price is now £✂.

With a published MCA of 89,127, the cost to serve the station on FM now exceeds £✂ per head of MCA per year.

✂ has offered a range of terms for the renewal of transmission services but have been clear that a long term commitment will be required on the basis that equipment at the sites is 'end of life' and will require replacement – we understand equipment at Haverfordwest is in most urgent need of renewal.

Whilst we would have preferred to recontract on a rolling-basis ✂ in order to keep our options open in a rapidly changing market but due to the immediate capital expenditure requirement this is not possible.

We should be clear, we are not being critical of ✂ we are laying out the reasons why an agreement has not yet been reached.

As outlined later in this paper, based on the information available to us, we do not consider taking transmission in-house or the use of alternative transmission sites to be viable options.

Whilst we have not concentrated on other cost considerations beyond transmission costs in this submission, we would credit Radio Pembrokeshire's longevity as one of the UK's smallest commercial radio stations due to the shared resourcing it already enjoys with Nation's other local services in South and West Wales: Radio Carmarthenshire, Swansea Bay Radio and Bridge FM Radio.

We are also aware that the growth of Nation Radio including its launch on FM in the area and the availability of other Nation Broadcasting services in Pembrokeshire on DAB including Dragon Radio and Nation 80s has widened listener choice and given local advertisers a wider range of marketing opportunities.

In respect of revenues, the station has seen ✂. This is attributable to a number of factors including ✂.

Conversely, despite audience hours declining in recent years, a change in National sales representation ✂ has resulted in ✂.

The station has also introduced advertising to its online streams during the period to further enhance revenues.

✂ *redacted table*

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RAJAR Reach Q1	22.7	16.6	26.6	covid	31.6	35.5
RAJAR Hours Q1	117.9	169.4	149.4	covid	196.8	190.2

Source: RAJAR and ☒

All economic indicators and trends suggest that the station needs to take action to ☒ in order to continue to ☒.

## ENVIRONMENTAL, GENERAL POLICY CONSIDERATIONS AND PRECEDENT

The discontinuation of relay transmitters at Fishguard and Tenby would reduce the electricity required to power transmission resulting in an environmental saving.

We also note the following decisions of Ofcom to similar transmission amendment requests made by Absolute Radio in 2018

(<https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-3-4-weeks/110996--absolute-radio-proposals-to-reduce-am-coverage/associated-documents/statement-absolute-radio-proposals-to-reduce-am-coverage.pdf?v=323128>) and Sunshine Radio in 2023 (<https://www.ofcom.org.uk/tv-radio-and-on-demand/analogue-radio/december-2023/>)

Whilst these requests relate to AM transmission – we believe a number of the points made in the submissions and in Ofcom’s responses to be relevant here.

In our research for this submission, we have also discovered that the original coverage brief for the Pembrokeshire licence does not appear to include the Fishguard or Tenby sites (see Appendix A – Source: National Archives).

As we will set out, we believe that our proposal meets the primary objective as set out in the coverage brief of ‘satisfactory coverage of the main population centres within the County.’

## IMPACT OF THE PROPOSAL ON MCA COVERAGE

	<i>People (15+) served at 54dBuV/m (within MCA)</i>	<i>% of current coverage (within MCA)</i>
<i>Haverfordwest, Fishguard &amp; Tenby VHF</i>	<i>94,697</i>	<i>100.0%</i>
<i>Haverfordwest &amp; Tenby VHF</i>	<i>89,465</i>	<i>94.5%</i>
<i>Haverfordwest &amp; Fishguard</i>	<i>94,260</i>	<i>99.5%</i>
<i>Haverfordwest Only</i>	<i>89,028</i>	<i>94.0%</i>

☒ has provided the above data which indicates that the impact of the proposal would be the loss of FM signal to 5,669 people, representing 6% of the MCA.

As previously mentioned, our audience research indicates that ***in a worst case scenario*** we might expect to see a fall of just over ✂ listeners and just under 6% of audience hours if listeners are unable to migrate to an alternative platform.

We would seek to minimise this impact by a social media and on-air campaign in advance of the closure of FM to inform listeners in Tenby and Fishguard of coverage changes.

We would also draw Ofcom's attention to the Mid and West Wales local DAB platform which has transmission sites operating in Tenby and Fishguard which carry the Radio Pembrokeshire service.

✂ mapping demonstrates only very small geographic areas (marked in blue) which would have no version of Radio Pembrokeshire available on FM or DAB if this proposal proceeds.

✂ ***Redacted mapping***

## IMPACT OF THE PROPOSAL ON AUDIENCES

As submitted we do not anticipate a material impact on audiences as a result of this change.

We have not referenced the FM frequencies on air for a number of years as many radios now sort alphabetically rather than by frequency and FM is one of a number of platforms on which the station is available.

We have also submitted evidence supporting a growing shift of audience away from the FM platform both generally, and also in this area.

After any change, Radio Pembrokeshire will continue to be available in these areas on other platforms including DAB and online.

DAB transmission from the Mid and West Wales multiplex is from Greenhill, Tenby and from the same transmission site as FM in Fishguard.

Absent 107.5FM, certain radio set may automatically switch to 102.5FM if the signal is available or DAB depending on the SID/AF/PI relationship stored within them.

In advance of the change we would run an extensive on-air campaign highlighting the change and inviting listeners to tune in by another method.

This would be supplemented by a dedicated website page detailing the ways in which the station can be found in these areas including an opportunity for listeners to contact the station for additional help.

There will be no change to the way the station can be accessed online through devices such as Amazon Alexa.

Over the course of 2024, Radio Pembrokeshire's parent company has invested heavily in the Nation Player mobile app – which has enhanced support for Apple Car Play and Android Auto and provides a further way for listeners to access the service.

We understand that a small number of listeners may still be impacted and we will respond to any feedback submitted via our website.

## ALTERNATIVE OPTIONS CONSIDERED

Prior to this submission we have considered a number of alternatives including:

**Continuation of all three sites** – based on the information available to us about the changing nature of the marketplace and ✂, we do not consider this a viable option.

**Continuation of all sites based on revised terms incorporating clauses about the economics of repair should existing kit (which is already beyond useful life) fail.** ✂



**Alternative supplier for transmission** – Pembrokeshire is a relatively remote area and given its terrain, transmitters are prone to lightning strikes. Nation does not generally self-maintain sites and we believe this option would add cost and complexity into existing arrangements resulting in significant periods of outage if a problem occurred. Generally, the pool of engineering talent for transmission is declining (due to loss of specialists through age/retirement/ill health) and is employed directly or indirectly by ~~X~~ or is currently engaged with the roll out of small scale DAB, and is geographically located far from West Wales adding to cost and time to resolve any issues arising.

**Alternative transmission site option** – We have considered ~~X~~ as an alternative main site to Haverfordwest. ~~X~~. Nevertheless, we considered that the complexity of changing transmission sites was too expensive and time consuming whilst delivering limited benefit in respect of coverage or cost.

**Closure of the service** – we do not believe that the station has yet reached a point where it is no longer viable to continue in some form and, as demonstrated earlier, FM remains an important platform for listening currently.

For similar reasons, we do not contemplate the **sale of the business** as an option currently in scope.

**Closure of the service on FM only** – we have considered making Radio Pembrokeshire a DAB only service by surrendering the FM licence. However, we believe that continuation on FM in some form is a more sensible option for some years into the future and is likely the best route to protect the continuation of a local radio service for local listeners on FM.

**Use of Nation Radio's FM frequency in Pembrokeshire (at Preseli) as an alternative** (i.e. hand back the existing licence and repurpose a transmitter from another license) – whilst this might have been a viable solution for the short to mid-term, this does not align with our overall strategy of ~~X~~. Such a change would also be subject to regulatory permissions / format review process – the outcome of which is uncertain. The frequency change may also cause confusion for listeners and advertisers in the area. However there is sufficient precedent (for example with the South Coast Regional License operating Greatest Hits / Hits Radio) to suggest it is a potentially viable alternative option to reconsider if this request is unsuccessful.

**Hand back the licence in order to prompt a full relicensing process based on a single site in the future** – ~~X~~ create a significant period where no local service at all would be available to listeners on FM. ~~X~~, we do not believe that there is a viable business model for a new entrant (especially since Radio Pembrokeshire would likely continue to be available on DAB in this scenario) and a new entrant would unlikely have the adjacent infrastructure and back office efficiencies that Nation currently offers the Local Pembrokeshire FM service.

To support this view, we note that community radio has failed to launch in the past in this area of West Wales (Radio Beca 2012-2015), presumably on the grounds of cost.

Additionally, Ofcom is not bound to re-advertise an FM licence in this scenario, even if there is demand from prospective applicants, creating a greater level of uncertainty for this option.

## CONCLUSION

We have concluded that this request represents the best outcome for listeners in Pembrokeshire, prolonging FM transmission of a local commercial radio service.

Within this paper, we have outlined a number of alternative routes that we would have to reconsider, should this request be rejected.

We believe these alternatives would result in outcomes which would more adversely impact the availability of a range of FM services in the area.

**Martin Mumford**  
**Company Secretary**  
**Haven FM (Pembrokeshire) Limited**

**24 September 2024**

**LOCAL RADIO LICENCE: COVERAGE BRIEF**

**PEMBROKESHIRE**

1. **This licence is being offered for the provision of an Independent Local Radio service on the FM (VHF) waveband.** The licence is offered provisionally for the use, from a single transmission site, of a single frequency on this waveband. However, the Authority is in principle willing to consider the extension of coverage into locations otherwise unserved (by ILR) which are contiguous to the area served by the main transmitter, either at the outset or subsequently, by means of low-powered FM relay transmitters, subject to the availability of one or more suitable frequencies (see paragraph 8 below).
2. **The closing-date for applications for this licence is Tuesday, 3 July, 2001.** Completed application forms (20 copies) must reach the Radio Authority, at Holbrook House, 14 Great Queen Street, London, WC2B 5DG, by 14.00 on that date. Applications delivered after this time will not normally be accepted.
3. This coverage brief provides information specific to the advertised licence for Pembrokeshire. Intending applicants must study, in conjunction with this brief, the **Notes of Guidance for Local Licence Applicants** (October 2000 issue), available from the Authority's Director of Development, which provides general information on the submission of a licence application and the requirements of an ILR service. Applications must be submitted on a standard **Application Form (Issue 27)**, also available from the Director of Development.
4. This licence is offered for a service designed to cover the following area:

**The county of Pembrokeshire.**

Applicants should aim to identify a suitable transmission site with the primary objective of achieving satisfactory coverage of the main population centres within the county. Coverage, as defined in the Authority's guidance document 'Coverage: Planning Policy, Definitions and Assessment', will be determined by the successful applicant's choice of transmission site, and the transmission parameters approved. If making use of the transmission site and characteristics detailed in paragraph 5 below, the predicted coverage of the licence should include most parts of Pembrokeshire. Applicants should note that, generally on FM, there may be localised deficiencies in coverage in certain pockets within the licence area, due to terrain or other environmental factors.

5. It is intended that this Pembrokeshire ILR service will operate on the frequency of **102.5 MHz**, which has already been cleared for use at the following existing transmission site:

<b>Location:</b>	<b>Haverfordwest</b>
<b>National Grid reference:</b>	<b>SN 028 261</b>
<b>Total maximum effective radiated power:</b>	<b>20.0 kiloWatts (10.0 kW horizontal polarisation + 10.0 kW vertical polarisation)</b>
<b>Aerial pattern:</b>	<b>Nominally omni-directional</b>
<b>Site height:</b>	<b>189m above sea level</b>
<b>Aerial height:</b>	<b>130m above ground level (i.e. 319m above sea level)</b>
<b>Site operator:</b>	<b>Crown Castle International</b>

6. If use is made of the transmission site and characteristics detailed above, the service should achieve coverage of an area containing an adult (aged 15+) population of around **90,000**.
7. Applicants are free, if they wish, to propose use of a transmission site other than the one detailed above. In the event that the licence is awarded to an applicant proposing the use of an alternative site, the Authority will, once it has satisfied itself that the successful applicant's transmission proposals are acceptable, seek clearance for the use of the planned frequency at the site and characteristics

agreed. Applicants should note carefully the points outlined in paragraphs 3.5-3.6 of the 'Notes of Guidance for Local Licence Applicants', and in addition should recognise that the submission of an alternative proposal for approval and clearance is a process that may take several months to complete, and that an outcome that is wholly satisfactory to the successful applicant cannot be guaranteed. A more comprehensive account is provided in the 'Notes on Approval Procedures for Sites and Frequencies', one of the supplementary documents listed in the Foreword to the 'Notes of Guidance', available from the Authority. Applicants proposing the use of a transmission site other than Haverfordwest are strongly advised to obtain and study this.

8. In addition to the coverage from the main transmission site proposed by an applicant for this licence, the Authority is in principle willing to permit one or more extensions of coverage into contiguous locations, by means of low-powered FM relay transmitters, subject to the identification of one or more suitable available frequencies. At the time of application, applicants should indicate whether they would aim to implement such relay transmissions facilities, either at the outset of the licence period or subsequently, and should state clearly to what extent their audience and revenue forecasts are dependent upon the provision of such facilities.
9. The licensee will be responsible for its own transmission facilities, and will be free to decide whom to appoint for the supply, construction and maintenance of its transmission system and equipment.

### **Total Survey Area**

10. Applicants should note that it is common for a local radio licensee to claim a Total Survey Area (TSA), for marketing and audience research purposes, which is more extensive than the coverage area, as technically defined, for which a licence is

advertised. This reflects the fact that some listeners living beyond the 'measured coverage area' will receive a signal of listenable quality. Applicants are free to decide what TSA adult population figure to use as the basis of their business plan; however, the assumptions which are made should be justified in the application, in responding to the question on advertising revenue forecasts.

### **Other licensing plans**

11. There is no existing ILR service providing coverage of the Pembrokeshire area. However, applicants should recognise that no local licensee is granted exclusive coverage of any given area. The Authority's licensing strategy involves the establishment, over a period of time, of a range of local radio services of varying scale and character.

### **Application fee**

12. This licence will fall into category D (adult population of less than 400,000). The application fee payable for this licence is £1,500.

### **Date of licence advertisement: Wednesday, 21 March 2001.**

Formal notice of advertisement (in both English and Welsh) placed in the 'Western Telegraph' of that date.

Issued by the Radio Authority, Holbrook House, 14 Great Queen Street, London WC2B 5DG, tel. 020 7430 2724.