

Jon Heasman
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA

30 July 2018

Dear Mr Heasman,

The Culture, Welsh Language and Communications Committee of the National Assembly for Wales has recently concluded taking evidence for its inquiry into radio in Wales, which it aims to report on in the autumn. As a result of the evidence received, the Committee has the following concerns over Ofcom's proposed relaxation of the localness guidelines for local commercial radio stations.

- **Reduction in the number of hours of local content**

- Ofcom has proposed reducing the minimum number of locally-made hours each local commercial station must broadcast. The Committee is concerned that this change paves the way for an increasing homogenisation of content, as stations will likely take the opportunity to further reduce the number of hours of local content that they produce.

- **Reduction in the number of "approved areas"**

- Ofcom has proposed reducing the number of approved areas in Wales within which programmes are considered to be locally-made. By merging three approved areas into one, companies which own multiple local licences will have the ability to switch shows that are produced in one part of Wales to a bigger hub somewhere else in Wales.
- The Committee is concerned that this change will lead to job losses, as companies may take the opportunity to centralise production to one site. This would likely have a detrimental impact on rural communities, with Cardiff likely being the chosen area in which to centralise production. If production were to move out of rural, Welsh-speaking areas it could also have a detrimental impact on the volume of Welsh language content: a matter of huge concern for Welsh-speaking audiences who are already inadequately served by the commercial radio market.
- As well as the economic and social impact of job losses, this change could potentially reduce the extent to which radio stations are embedded in – and reflect – the areas which they broadcast to, leading to a further homogenisation of content.

In 2016 Wales had the smallest local commercial revenue per head of population of any UK nation. As it would seem that there is less of a market incentive to provide local radio content in Wales, such content must be secured by regulation. Whereas a relaxation in local content requirements



may not lead to a diminution of local content in areas well-served by a competitive market, this is simply not the case in Wales. The small number of companies that dominate commercial radio in Wales will see the ability to reduce and centralise local content as a cost-saving opportunity: at the loss of local, distinctive content.

In his evidence to the Committee, Marc Webber, a senior lecturer in journalism and media at the University of Northampton, told us "it must be understood that there is more to Welsh life than news". These proposals would likely lead to a further erosion of non-news content that reflects the lives of local radio audiences in Wales, and the Committee calls on Ofcom to reassess them accordingly.

Yours sincerely

Bethan Sayed.

Bethan Sayed AM
Chair

