



**RESPONSE TO OFCOM'S INTERIM CONSULTATION  
REGARDING  
LOCALNESS IN LOCAL  
COMMERCIAL RADIO STATIONS**

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## 1 Introduction

This document summarises Estuary Media Limited’s response to Ofcom’s proposed statements regarding localness in local commercial radio.

Whilst appreciating that the proposals primarily affect existing operators, we have considered the proposals from the perspective of a prospective new small-scale radio station operator and therefore mainly limit our comments to those matters which would directly impact smaller stations.

Our response is set out as follows:

- A summary of our general perspectives regarding the objectives of local stations
- Specific comments relating to the questions set by the consultation.

## 2 General Perspective

In general, we agree with Ofcom’s statements regarding localness and feel these form a useful basis for framing the full consultation. Our aspirations for the output of local broadcasting are as follows.

1. We believe that the output of local broadcasting should extend beyond what the listener receives to include cultural enrichment, providing information and representing local interests, helping to profile community endeavours and, where appropriate, enhancing social gain (in the same context as is described in the Draft Community Radio Order for Community Radio).
2. We believe that this is most likely to be achieved when the station:
  - “lives and breathes” in the community it serves, understanding and sharing the aspirations and concerns of local people and businesses
  - has strong relationships with local groups, who regard the station as a partner and see that it provides reliable and non-partisan reporting
  - features high quality programming, giving adequate and balanced debate of local issues, including those which endure over a long term (e.g. the impact of a planned new airport runway in the vicinity)
  - has a character and branding which distinguishes it from stations in other areas, and has editorial freedom from centralised or remote groups

- is accessible, providing real opportunities for local information to be aired – regularly naming neighbourhoods, providing an immediate, relevant and local notice-board, etc
- is in touch with local people – helping to foster a sense of pride and identity with the locality.

### **3 Specific Response to Consultation Questions**

#### **Q1 Comments relating to Ofcom's views on localness**

We generally agree with Ofcom's statements, however please see our general comments above.

Specifically, we believe that the "major outcome of localness" goes beyond listener interests - vital though these are - to include business and local group representation.

Whilst not itself constituting local programme output, providing affordable opportunities for local small businesses to advertise is one further way that local radio can help stimulate its served economy.

#### **Q2 Applicability of statements to creating levels of localness**

We believe that the proposal offers a reasonable set of variables for characterising "localness", subject to the other observations we have made. Ultimately, a station's "localness" might be judged by its ability to provide, for a majority of the day, programming which is of interest to the people in its area.

We feel that the geographical bounding of a "local" area may need to be defined on a case-by-case basis, however a general distinction might be made between sub-regional (e.g. county-wide or city-wide) and regional boundaries.

#### **Q3 Other outputs**

Local commercial radio may in some cases seek to achieve social gain outputs, and importantly should serve the local economy as well as entertain, represent and inform listeners. For example, local radio can play an important part in generating awareness about investment incentive schemes applicable to a local area (such as the current Thames Gateway initiative).

Local radio should encourage debate on issues of local importance, including those which may develop over a longer period. For instance, giving opportunities for different aspects of an issue to be aired can really inform local decision making and encourage local people to take interest in and responsibility for their future.



## Localness in Commercial Radio

The immediacy and relevance of information such as news, travel, entertainments, etc is an important parameter for effective local radio.

Inducing a sense of local pride – civic pride in a town, association with a neighbourhood or school sports team, etc – as well as participation or sense of “ownership” in the station’s output can more effectively be achieved by local radio than through other media.