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Mr

Forename:

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Representing:

Organisation

Organisation (if applicable):

Cumbria County Council

Email:

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

3i) Do you agree with Ofcom's assessment that television continues to have an essential role in delivering the purposes of public service broadcasting?:

Cumbria County Council agrees wholeheartedly that television continues to play a fundamental role in delivering the purpose of public service broadcasting.

In particular we believe that the role played by the broadcast news media in explaining, challenging and holding to account public sector organisations is a vital part of our democracy. As a politically led public sector organisation we recognise that scrutiny of our activities by the local media is essential to vibrant local democracy. Broadcast media is particularly important in this respect because this is the way that the majority of people receive their local and national news. It is also the most trusted source of news. We are concerned that any diminution of this role could have serious long term consequences for public engagement in civic society. We are disappointed that this important public service responsibility is not given a higher profile in the public consultation document.

3ii) Do you agree that UK-originated output is fundamental to the delivery of public service broadcasting purposes?:

Cumbria County Council agrees that UK originated output is fundamental to the delivery of public service. However we are disappointed that the consultation does not recognise the significance of local and regionally originated output in delivering the four purposes of public service broadcasting.

The relevance and immediacy of locally developed output to the viewing public is intrinsically suited to 'increasing understanding of the world through news and analysis'. How better to engage the viewer than to explain the issues on their doorstep - the things most likely to impact upon their communities and themselves? The same is true of 'stimulating knowledge and learning' - by addressing those issues closest to home, locally originated output has an ability to stimulate and engage the viewer in way which more remotely developed content finds hard to match.

In Cumbria we are experiencing an enormous amount of transformation and change. The regeneration and renaissance of our major centres of population in Carlisle and Barrow, the transformation of west Cumbria through the Energy Coast initiative, and the growth of the county's own university are just a few examples of issues which will have a fundamental impact on the people who live in the county. Locally based public service broadcasting has helped improve local understanding - but these projects - vital to Cumbria's future - barely register on a regional news agenda.

Our experience has been that locally originated output plays an enormously important role in reflecting 'local' as well as 'UK' cultural identity. Over the years, local programming has played an important role in helping support and sustain strong local and regional identities, and stave off the 'one size fits all' model of national broadcasting. Cumbria and the Border region continue to enjoy a strong cultural identity which captured and reflected by the output of commercial public service provider Border Television. This distinct local identity has been largely lost in the alternative BBC output which has adopted a much broader regional model - merging a range of local identities without necessarily reflecting the originality of any of them in its output. Cumbria is split roughly on a north-south basis with coverage from the North East covering north Cumbria and the borders, whilst Manchester based output is directed to South Cumbria. In both instances there is very limited coverage of the local issues affecting Cumbria as a whole, and certainly without any intimate knowledge of local circumstances or empathy with the audience.

4i) Do you agree with Ofcom's conclusions about the way that other digital channels and interactive media contribute towards the public purposes?:

Cumbria County Council recognises that the availability of public service content online and through other digital platforms will grow in the future. However, this growth will be different across different age, socio-demographic and geographic profiles. In Cumbria we are planning for an ageing population ? by 2029 we anticipate that the ratio of workers to retired people will have fallen from 4 to 1 to 2 to 1. Ofcom's own research demonstrates that people aged over 65 watch twice as much television as those who are 16-24 and that the older age group is less likely to access information and services online. In Cumbria the evidence suggests that, because of our ageing population, the shift from a reliance on traditional television based public service broadcast platforms to a broader base of online and digital opportunities will lag behind other areas. Careful thought needs to be given to striking the right balance between providing greater public service content online and through other digital platforms and sustaining traditional broadcast routes. The solution should recognise the fact that different people and different communities may have different requirements and move at a different pace.

We recognise the assertion that central and local government are investing heavily in online content. This is undoubtedly true; however, this is principally with the aim of improving access to public information and public services. It should not be regarded as an effective substitute for challenging and informative local news and programming. The fact that such content is independently produced is an important principle which underpins the role of the fourth estate ? challenging and holding to account public bodies and decision makers in a way which improves the knowledge and understanding of the community. This is an important principle of public service broadcasting which should be fully considered in Ofcom's review.

5i) Do you agree with Ofcom's assessment of the implications of different economic scenarios for the UK TV market for the future prospects for delivery of the public purposes?:

Cumbria County Council accepts that the provision of regional news and programming places a significant cost pressure on public service broadcasters and that this is an area which will face growing pressure into the future. These pressures do need to be addressed in the interests of the long term sustainability of delivery of the public purpose.

We do acknowledge that there will be continued evolution in the way audiences consume media and that there will be new opportunities for delivering the public purpose through new and different platforms. However, in pursuing these new opportunities, running at the pace of the quickest risks leaving significant sections of the audience behind ? potentially introducing a degree of exclusion amongst groups who are already disadvantaged and have most to gain from the public service purpose. Within the right framework the diversification of public service platforms presents an opportunity to meet the needs of a multitude of audiences in a way which meets their specific requirements ? but this needs to be progressed with a real sensitivity to the

immediate impact on these audiences ? not just an analysis of where they might be in the future.

We accept that fragmentation of the media market and intensification of competition will create a pressure to reduce investment in UK originated content. It appears that the initial response of broadcasters to these pressures is to scale back on truly local television content. We believe this presents a considerable threat to the key public service purpose of reflecting UK cultural identity. It is important to recognise that true UK identity is not a single entity ? but a rich composite of the many different and unique characteristics of local and other communities. By reducing the visibility of these distinct identities we risk replacing our multilayered cultural identity with a sterile one size fits all version.

5ii) Do you agree with Ofcom's analysis of the costs and benefits of PSB status?:

No further comments on this section

6i) Do you agree with Ofcom's vision for public service content?:

Cumbria County Council welcomes Ofcom's vision and in particular the commitment to ?supplying diverse content which meet the needs of all communities within the UK?.

We accept that diversification of platforms will be an important aspect of how this element of the vision will be delivered in the future ? but strongly believe that, to be fully effective, future models must retain a place for locally based public service broadcasting.

We do have some concern that the vision for the future as currently expressed does not fully capture the important role to be played by public service broadcasters in supporting civic engagement and the democratic process by informing local communities about the role of public agencies - and by challenging and holding public bodies and elected politicians to account. These are important public service principles which should be visible in any vision for the future.

6ii) How important are plurality and competition for quality in delivering the purposes of public service broadcasting, and in what areas?:

Plurality is important to ensure that audience choice is preserved ? and that competition ensures that the quality of output is sustained.

But plurality is undermined if it no longer provides access to a range of different voices and perspectives ? including those of different localities. The move away from truly local broadcasting to an enlarged regional model is already making it harder for public service broadcasters to reflect local issues in news and programme content. The BBC model of regional news provision is based on a myth which assumes that viewers on the west coast of Cumbria share some empathy or shared appetite for local

news stories with viewers in the North East. This is not the case ? and the practicalities of broadcasting across such a region is that large swathes of our people and places are overlooked and feel that ?local? TV news no longer applies to them.

Plurality in terms of local news and programming has not existed for some time, with local provision being largely left to the commercial sector. The proposed withdrawal of the Border TV Lookaround programme will to a large extent mean that England?s second largest county is marginalised to a six minute opt-out in a North East based programme.

Whilst we agree that plurality is highly prized by audiences to the extent that research shows they would be prepared to pay more to preserve it, our experience is that plurality does not exist at a local level and any remnants are fast disappearing.

6iii) In maximising reach and impact of public service content in the future, what roles can different platforms and services play?:

Cumbria County Council recognises that the public sector does and should play a role in providing public service content through its own media platforms. Our own experience in developing our online information and improved accessibility to services demonstrates that there is a growing appetite for access through these routes - though in Cumbria our ageing population is one reason why this appetite lags slightly behind other areas.

However, it is important to recognise that local authorities and other public sector agencies exist to provide public services ? not public service broadcasting. The commercial constraint facing broadcasters are more than matched by the financial pressures facing the public sector ? and whilst we are constantly exploring new and innovative ways to reach the public and deliver services to customers, there are real service pressures which limit our capacity to help fill the void left by the withdrawal of locally based public service broadcasting from our area.

6iv) Do you agree that the existing model for delivering public service broadcasting will not be sufficient to meet changing needs in future?:

There appears to be little doubt that it will not be possible to deliver the same level of public service broadcasting within the existing model. But in changing the approach it is important that every effort is made to ensure that the public purpose continues to be met.

7i) What are your views of the high-level options for funding public service broadcasting in future?:

The four options appear to be a realistic consideration of possible ways forward. A key aspect of whichever model is adopted should be to minimise the impact on the viewer. Direct taxation or increased licence fees should be avoided if at all possible.

7ii) Are the proposed tests of effectiveness for future models for public service broadcasting the right ones?:

Yes ? subject to the point made in i) above

7iii) Of the four possible models for long term delivery of public service content, which, if any, do you consider the most appropriate and why? Are there any alternative models, or combination of models that could be more appropriate, and why?:

Model 1 (Evolution) is probably the most attractive model as things currently stand as it permits the flexibility to provide additional support in those areas of high public priority.

Model 2 (BBC Only) and Model 3(BBC/C4 plus limited competitive funding) are not favoured because they imply a complete erosion of any remaining plurality - an aspect of public service broadcasting which viewers regard as important.

Model 4 (Broad competitive funding) has some attractions - but this is dependent on what the ?specific public service content? contract are likely to include.

It may be possible to comment further during phase 2 of the consultation process.

8i) What do you think is the appropriate public service role for Channel 4 in the short, medium and long term? What do you think of Channel 4's proposed vision?:

No comments on this section

8ii) Which of the options set out for the commercial PSBs do you favour?:

No comments on this section

9i) To what extent do you agree with Ofcom's assessment of the likely future long term issues as they apply to the nations, regions and localities of the UK?:

Cumbria County Council recognises and supports Ofcom's assessment of the key issues facing regional and local broadcasting.

In particular we support the recognition that:

- New opportunities for local and regional provision through online and digital platforms are ?not ubiquitous and are not currently seen by the core regional television audience as a substitute for existing services?.
- ?It is clear that viewers place the most value in regional programming on regional news and information?. This closely matches our own experience and the well supported campaign to save the Border TV Lookaround is further evidence of this. We are currently conducting our own limited research in this area which we will submit during phase 2 of the consultation.

- We recognise that local news is expensive - and presents high opportunity costs for ITV plc. However, there must surely be some sensible correlation between the fact that broadcasters invest most in the area which viewers value most highly. To shave costs in this area begins to seriously undermine the public service principles.

9ii) Which model(s) do you think will be most appropriate in each of the nations and in the English regions in the long term, and why?:

No comment submitted at this stage

9iii) What are your views on short/medium-term issues referred to, including the out-of-London network production quotas?:

No comment submitted at this stage

9iv) What are your initial views on the preliminary options set out relating to ITV plc's regional news proposal? (Please note that Ofcom will put forward firm options on these issues, and consult also on ITV plc's regional news proposal, in phase 2 of this Review.):

Cumbria County Council has opposed the move to reduce the service currently provided by the Border TV Lookaround programme on a number of grounds.

- Loss of local identity. Our experience of the BBC North East and North West output is that Cumbria is largely invisible in the output which is heavily focused on the main metropolitan areas. The cultural identity of Cumbria is not reflected in programming.
- Loss of local knowledge and broadcasting infrastructure. The reduction in the newsgathering operation in the Cumbria area will inevitably lead to a lack of local knowledge and a reduced ability to identify and monitor key issues of relevance to the local community. The geographical scale of Cumbria will make it hard for a reduced newsgathering team to gather stories from across the county ? and are likely to focussed on ?easy hits? in the main centres of population
- Loss of civic engagement ? the fact that Cumbria?s issues will be competing in a wider news agenda will mean that it will be harder to educate and inform local people on issues which are relevant to them. The council currently works very closely with Border TV to ensure that key issues which will impact on local people and places are properly explained and understood. This capacity will be greatly diminished and, given the pre-eminence of broadcast news in public preferences, a key element of civic engagement will disappear.
- Lack of alternative platforms ? whilst Cumbria has a number of successful weekly and daily newspapers and radio stations there is no other broadcast platform which provides in-depth news coverage about the area. BBC provision has marginalised Cumbria and a further loss of service will reduce the visibility of the county further. Whilst online news provision is growing through local press provision, and public sector agency online media presence improving, Cumbria does not have a great depth of alternative media outlets. Take up of online services in the county has been slow ? probably as a result of the age profile of the population.
- Digital switchover ? a promise not fulfilled. Cumbria has enthusiastically supported the Digital Switchover and we have been willing participants despite being the

switchover guinea pigs. This support is based on the promise of increased choice ? but in the short term at least, all the people of Cumbria see is that choice relating to local public service broadcasting is being withdrawn.

- No consideration of reinvestment into local newsgathering. We are concerned that ITV does not appear to have considered how the savings being made by the reduction in back-office facilities might be reinvested into frontline broadcasting ? and thereby improve local broadcast content. The proposal at the moment appears to imply the removal of the local broadcasting centre in Carlisle and a reduced newsgathering presence in the county. This will inevitably impact on local content. We believe that a more sensible balance could be struck to ensure that a more robust newsgathering presence could remain in the county to sustain the quality and variety of local content.

10i) Do you agree with our assessment of the possible short term options available relating to children's programming:

No comments on this section

11i) Do you agree that new legislation will need to be in place by 2011 in order to ensure continued delivery of the public purposes in the medium and long term?:

No comments on this section

Comments:

This response was agreed by Cumbria County Council's Cabinet on Tuesday 10th June 2008