

Your response

Question	Your response
Question 1: Do you agree with the proposed broadcast licensing priorities for the short to medium term? Please give reasons for your answer.	Confidential? – Y We strongly agree with the proposal to prioritise application rounds for new FM community radio licences. While the move toward Digital Audio Broadcasting (DAB) is clear, there remains a critical need for FM provision in "fringe" geographic areas like Orpington (BR6) and Swanley (BR8) where Small Scale DAB signals are too low and suffer interference. Drive-tests show many drop-outs and dead-spots when listening in a vehicle and very poor to non-existent reception indoors. These locations sit on the boundary between Greater London and North West Kent. As a result, they are often overlooked by large-scale London transmitters that focus on the "inside-the-M25" core, yet they are too far north for many Kent-based services to provide hyper-local relevance. A dedicated FM community radio round is the only viable way to ensure these specific towns receive the tailored coverage they deserve.
Question 2: Do you consider that the proposed broadcast licensing priorities for the short to medium term will provide sufficient provision for audiences? Please give reasons for your answer.	Confidential? – Y Provision will only be "sufficient" if the proposed FM application rounds account for the unique topography and demographics of the London/Kent border. In Orpington and Swanley, the local population includes a significant number of residents and commuters who rely on FM in-car and at home. For these groups, the transition to DAB is not yet complete. Furthermore, the "Social Gain" required by the Community Radio Order 2004 can only be fully realised through a platform that is accessible to all, including those on lower incomes who may not own DAB+ compatible devices. Without a dedicated FM round for this region, these residents remain underserved by existing national and local services.
Question 3: For post-launch SSDAB multiplex coverage improvement or extension requests only, do you agree with our proposed change in	Confidential? – Y We agree with the proposed change to lift the restriction on the 40% ceiling. Topography of an area, demograph-

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approach to our application of the rule which restricts overlap with local muxes to 40% of the population already covered by the local mux (the “40% ceiling”)? Please give reasons for your answer.	ics distribution and economic viability are very important considerations for the sustainability and accessibility of Small Scale DAB, and an arbitrary limit should not be applied.
Question 4: Do you agree with Ofcom’s analysis in section 3 and at Annex A1 of the existing broadcast licence types? Please give reasons for your answer.	Confidential? – Y We agree with the analysis that FM Community radio continues to show high demand, particularly in under-served areas. However, we would urge Ofcom to recognise that "underserved" should not only refer to rural areas but also to "urban fringe" areas like Orpington and Swanley. These towns have high-density populations and vibrant community hubs (such as The Walnuts in Orpington and Swanley Town Centre) but lack a broadcast voice that focuses on hyper-local issues.
Question 5: Do you agree with our assessment on the impact of our proposed broadcast licensing priorities for the short to medium term at Annex A3? Please give reasons for your answer.	Confidential? – Y We agree with the assessment of the impact, with the caveat that all geographical areas and variety of services are carefully considered, especially the underserved and under-represented in order to cater for all as part of diversity and inclusion.
Question 6: Do you have any other comments to make on the proposals?	Confidential? – Y We formally request that Ofcom includes South East London and North West Kent in its upcoming spectrum availability analysis. The social benefits of a radio station in this area would be significant, including: Volunteer Training: Providing media literacy and technical skills to students at local institutions like London South East Colleges (Orpington & Bromley Campuses).

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	Community Cohesion: Bridging the gap between the urbanised town centres and the more rural surrounding villages (e.g., Crockenhill, Hextable). Local Accountability: Providing a platform for local councils and community groups (like Orpington 1st or Swanley Town Council) that currently lack a local broadcast outlet. We believe that with a flexible approach to technical planning, frequencies can be identified that serve these communities.

Please complete this form in full and return to broadcast.licensing@ofcom.org.uk.