

Request to vary transmission sites – Nation Radio Ceredigion (shortly to become Nation Radio North Wales)

PUBLIC VERSION

✂ indicates redacted text from confidential version

SUMMARY

- Radio Ceredigion Limited requests to cease transmission on Nation Radio Ceredigion's FM relay sites at Mynydd Pencarreg (97.4FM Lampeter) and Penwaun (96.6FM Cardigan) on 30 June 2025.
- This request is based on technical, commercial, and environmental factors and is made to preserve the continuation of the FM service in Ceredigion from the main transmitter site at Blaenplwyf.
- We recognise that these proposed changes will impact listeners as the predicted FM coverage loss is 19,183 people at 54dBuV/m within the MCA.
- In addition to the continuation of transmission on 103.3FM at Blaenplwyf, Nation Radio Ceredigion (the existing service) is also available on DAB from both the Ceredigion and North West Wales DAB multiplexes and the same programme service, with alternative commercials and travel news (Nation Radio West Wales), is available on FM from transmitters in nearby Carmarthenshire and Pembrokeshire, and on DAB as part of the Mid and West Wales multiplex.
- If these additional transmitters and platforms are included in the analysis then FM coverage of a version of Nation Radio is lost to 16,617 people and, when including DAB coverage this further reduces to 8,919 people predominantly in Lampeter.
- In addition, Nation Radio Ceredigion will continue to be available online and mobile app, meaning the actual number of listeners lost to the station will be reduced to a minimum.
- A combination of topography and low population density in parts of rural Wales, makes the cost of serving listeners via traditional broadcast transmitters increasingly prohibitive.
- Relative to the small population served, transmission costs for FM in Ceredigion are already many times more expensive per head of population than stations located in more urban parts of the UK.
- Transmission contracts for the sites are shortly due for renewal and the transmission equipment requires replacement as it is beyond end of life.
- Given increasing costs of delivery and the impacted audience's ability to hear the service on other platforms, we believe this request is consistent with the FM licence condition to serve as much of the licensed area as is, for the time being, reasonably practical.
- We have only recently agreed terms that are commercially acceptable to Radio Ceredigion Limited to continue broadcast at Blaenplwyf. We apologise for the relatively short period of time available to consider this request.
- Whilst we recognise that the audience loss is significant, if this request cannot be accommodated, the only alternative currently under consideration by Radio Ceredigion Limited is to surrender the FM license altogether and cease FM transmission at all three sites on 30 June 2025 which will inevitably reduce the choice of available service to listeners across a wider area.

BACKGROUND

Nation Radio Ceredigion is operated by Radio Ceredigion Limited ("The Company") and has held an Ofcom FM licence for Ceredigion (originally as Radio Ceredigion) since 2010.

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

The Company currently operates Nation Radio Ceredigion ("the station") following a successful application for the fully readvertised licence in 2019. We intend to shortly rebrand the service to Nation Radio North Wales to match its DAB footprint.

The station also broadcasts on DAB and is available online at nationplayer.com and on streamed devices.

Given that the transmission contracts have been in place for many years prior to Nation's acquisition of the service from Tindle Newspapers in 2010 and in recent years has been subject to punishing RPI increases, and with FM audiences in general decline, we believe it is an appropriate moment, as the transmission contracts come up for renewal, to request a reduction in transmission coverage in order to ensure the preservation of the service through the remainder of the current licence period.

Our technical request is the cessation of the relay transmitters operating on 97.4FM near Lampeter and 96.6FM near Cardigan on 30 June 2025. This date coincides with the retirement of nearby Radio Pembrokeshire's Fishguard and Tenby transmitters and therefore provides an opportunity for co-ordinated messaging of these changes which has already begun on our website: <https://www.nationplayer.com/bigswitch/>

We have only very recently secured acceptable terms to renew transmission at Blaenplwyf and therefore ongoing transmission costs would be reduced by ~~8~~9% whilst resulting in the loss of the current service on FM to 26.1% of the MCA.

This loss can be substantially mitigated by a large proportion of those people (predominantly located in Cardigan) receiving an alternative version of the same service on FM from transmitters in Pembrokeshire and Carmarthenshire.

The closure of the relays 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 for us to serve the whole MCA.

Outside of the clear economic case, we believe there are policy reasons why this request should be agreed whilst if this request is unsuccessful we will surrender the FM licence altogether which would reduce the number of available services to the entire MCA for a prolonged period.

EVIDENCE OF GENERAL DECLINE IN FM LISTENING IN THE LICENSED AREA

It is not possible to provide data specific to the county.

The Ceredigion service has not participated independently in RAJAR since 2019 and has instead been combined with Nation Radio South Wales transmission coverage area.

More recently, Nation Radio has split coverage areas for Wales with a North and South Wales report matching the transmission areas of Heart in North and South Wales.

As demonstrated below, the RAJAR coverage area for the North Wales area includes Aberystwyth but excludes Lampeter and Cardigan.

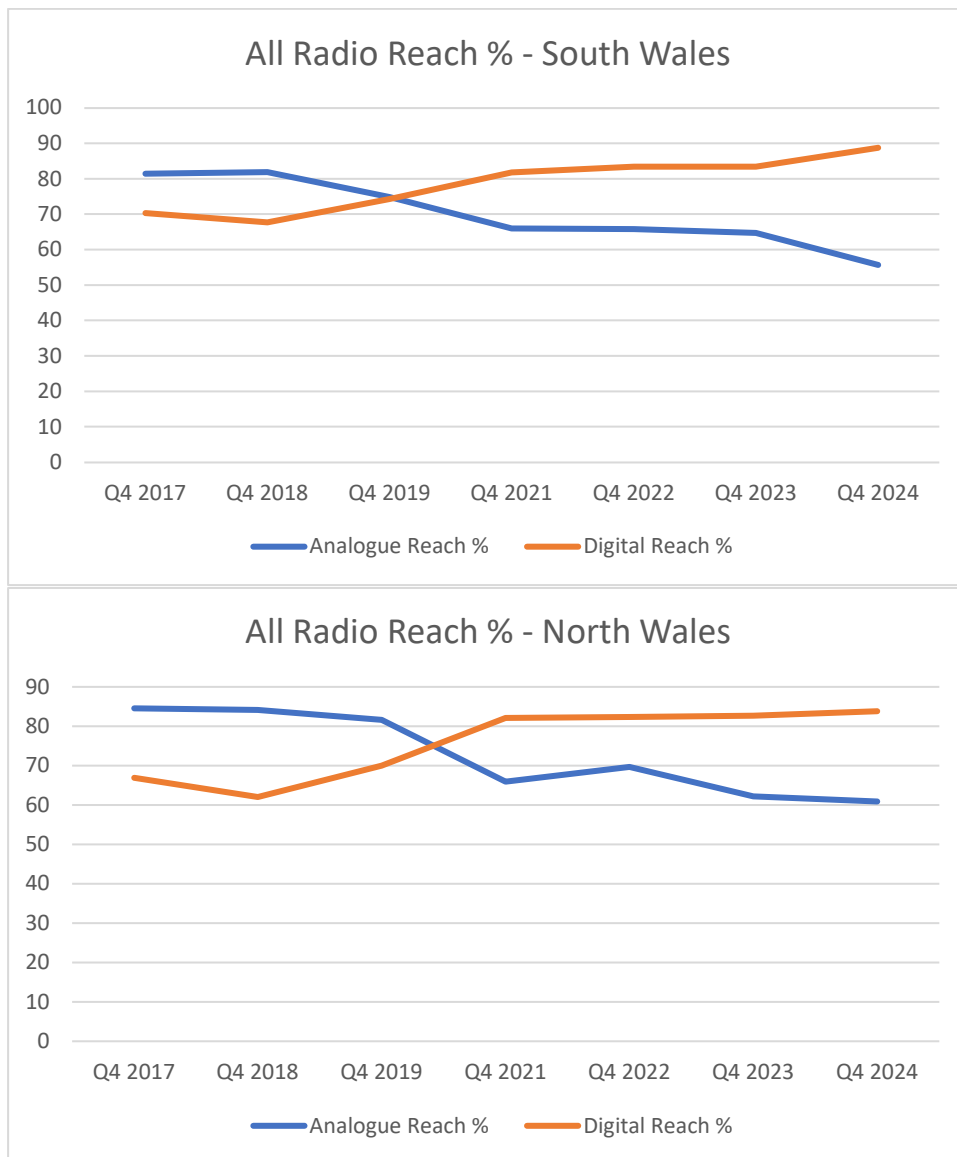
The removal of FM transmitters in Lampeter and Cardigan would be consistent with this survey area.



RAJAR area – Nation Radio North Wales

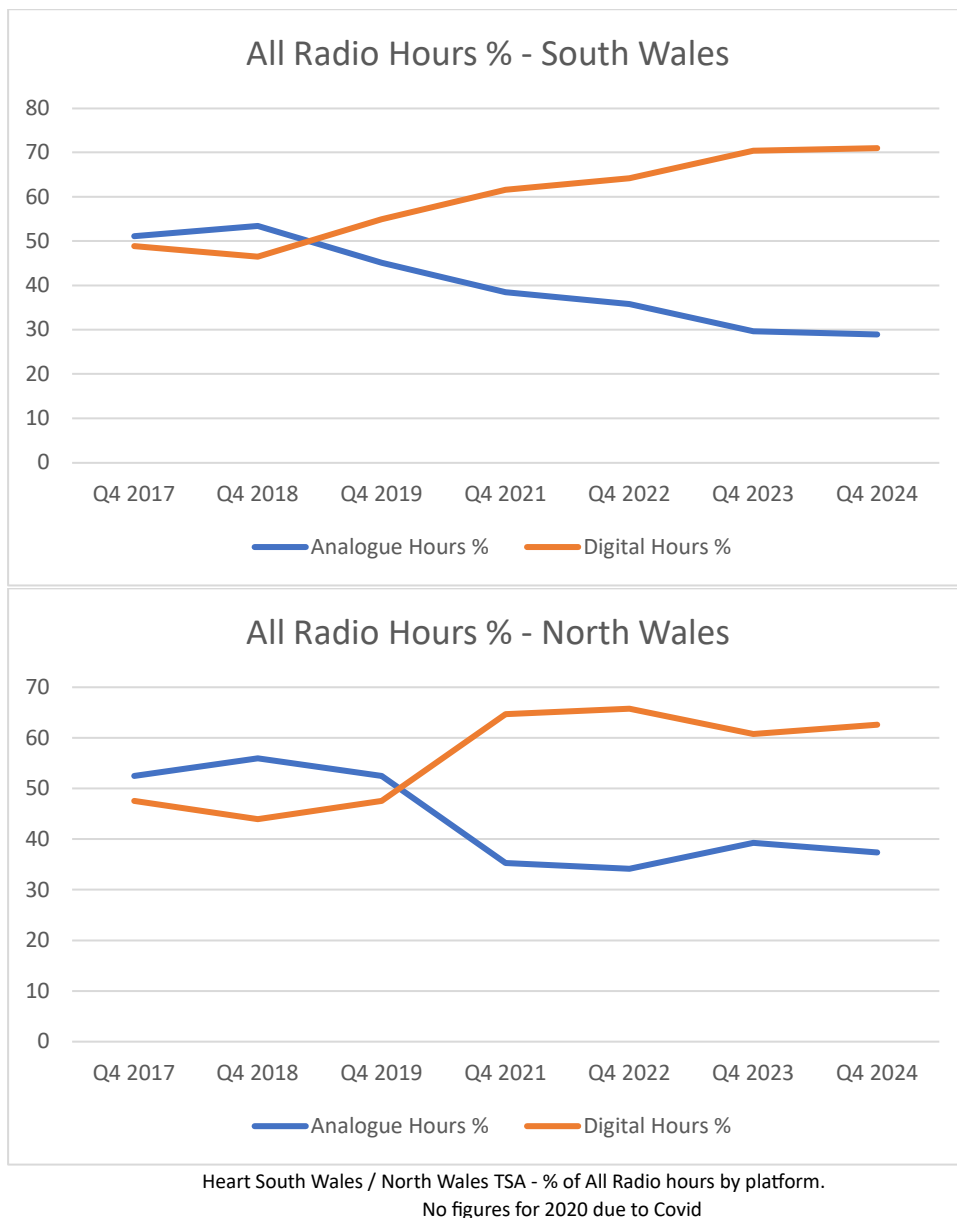
Whilst we cannot extract meaningful data specific to the Ceredigion MCA, the graphs below demonstrate that the proportion of FM reach is declining within the South Wales and North Wales areas whilst digital hours now account for the majority of hours in the market.

The gap is wider in hours which generally determines the amount of National Revenue received by a service and the overall effectiveness of radio advertising campaigns.



Heart South Wales / North Wales TSA - % of All Radio reach by platform.
No figures for 2020 due to Covid

Please note that as listeners can be counted twice if they listen on several Digital platforms as well as FM, the proportion of published reach in these graphs in some cases will always total to more than 100%.



We are wary ~~of~~ RAJAR ~~as~~ given the very low number of diaries in some sectors however the relevant sample point analysis from the latest survey shows only a small number of listeners to Nation Radio FM in the MCA outside of Aberystwyth.

~~of~~ REDACTED TABLE

This sample point analysis suggests in a worst-case scenario that the loss of the two relay transmitters might correlate to a loss of ~~of~~ listeners and ~~of~~ weekly listening hours.

Although we do not survey the Ceredigion area independently, this loss represents just ~~of~~% of Nation Radio's overall audience across Wales and ~~of~~% of weekly listening hours.

OFCOM PRECEDENT AND LICENSING HISTORY

Ceredigion is uniquely placed in Mid-Wales – it is neither in North Wales or South Wales although it was historically part of Dyfed (Pembrokeshire, Carmarthenshire, Ceredigion).

In Ofcom licensing policy, the FM licence was originally attributed to the historic North Wales approved area and was subsequently also placed in the historic South Wales area following its acquisition by Nation. Wales subsequently merged into one approved area and these areas were dispanded under the most recent Media Act.

Similarly, Ceredigion was included in the MCA of Heart North Wales and not Heart South Wales.

However, conversely Ceredigion was included in the local DAB area of the Mid and West Wales local DAB multiplex.

A Nation Group owned company has recently launched an independently multiplexed DAB transmitter in Aberystwth to allow broadcasters including Nation Radio to send the “correct” version of their service into the area.

The RAJAR areas of Heart North Wales and Heart South Wales bisect the Ceredigion county and with Nation Radio now having adopted the same transmission area as Heart for future audience surveys, Nation Radio needs to take steps to ensure ✂.

COMMERCIAL CONSIDERATIONS

As well as the ongoing requirements to ✂, this request is also set against the following commercial considerations: declining local revenues, low audiences, increasing transmission costs and equipment which is in need of renewal.

The transmitters at Blaenplwyf and Lampeter are operated ✂ – this means ✂ are responsible and own the equipment and procure all aspects of transmission.

At Cardigan, the ✂, ✂ and ✂ provide transmission maintenance services only.

Our accounting records indicate that in 2010 transmission costs were approximately £✂ + VAT per annum.

Over time, taking into account RPI increases, some re-engineering when moving studio base, the current (Feb 2025) annualised costs are now approximately £✂ + VAT.

The transmission contract is now due for renewal and ✂ have indicated that equipment at all three sites is now well beyond useful life and in urgent need of replacement.

In respect of revenues, the station has seen ✂.

This is attributable to a number of factors including ✂.

A large proportion of local revenue attributable to the transmitter relate to regional clients who are booked on Nation Radio’s other transmitters in Wales – there are only a very small number of clients advertising exclusively on the Ceredigion transmitter set.

National sales have £1.5m.

National revenue will be £1.5m in 2025 as the Nation Radio North Wales’ national revenue will be independently identifiable and is likely to be significantly higher, given that the current split of audience hours between North Wales and South Wales (Q4, 2024 RAJAR) is 98%:2%

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

Revenues £000	2024	2023	2022	2021	2020	2019
Local	£1.5m	£1.5m	£1.5m	£1.5m	£1.5m	£1.5m
National	£1.5m	£1.5m	£1.5m	£1.5m	£1.5m	£1.5m
Internet	£1.5m	£1.5m	£1.5m	£1.5m	£1.5m	£1.5m
Total of above	£4.5m	£4.5m	£4.5m	£4.5m	£4.5m	£4.5m

Source: relevant Statutory accounts information (2019 to 2023) and management accounts for 2024

The existing £1.5m transmission contract is due to expire shortly and £1.5m. Given the terms offered and requirement to invest in capital expenditure, throughout this time we had considered the most likely outcome to be the cessation of the service on FM at all three sites.

Nevertheless, we have very recently £1.5m.

This agreement was reached in principle on 20 March 2025 and is subject to the successful completion of this technical request.

We apologise for the relatively short period of time between making this request and the proposed cessation of transmission at the sites, however for the reasons outlined this was not previously seen as a viable option.

We did £1.5m.

After a small amount of one-off costs to decommission Cardigan (which we would bear anyway if we were to cease transmission at all sites) we will be able to reduce transmission costs to £1.5m+VAT per annum achieving a reduction of 50% from current levels.

ENVIRONMENTAL, GENERAL POLICY CONSIDERATIONS AND PRECEDENT

The discontinuation of relay transmitters at Lampeter and Cardigan 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.

Nearby Radio Pembrokeshire will be ceasing to provide coverage from its relay transmitters in June 2025 following a recently approved request. ([Radio broadcast update – November 2024 - Ofcom](#))

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

The data table below, provided by Arqiva shows when combining the requests the overall impact to the MCA is a loss of coverage to 19,183 people within the MCA.

People 15+ served within MCA at 54dB - AL102588 sites only		
Nation Radio AL102588 (current)	61,385	83.51%
Nation Radio AL102588 (Blaenplwyf only)	42,202	57.41%
Change	-19,183	-26.10%

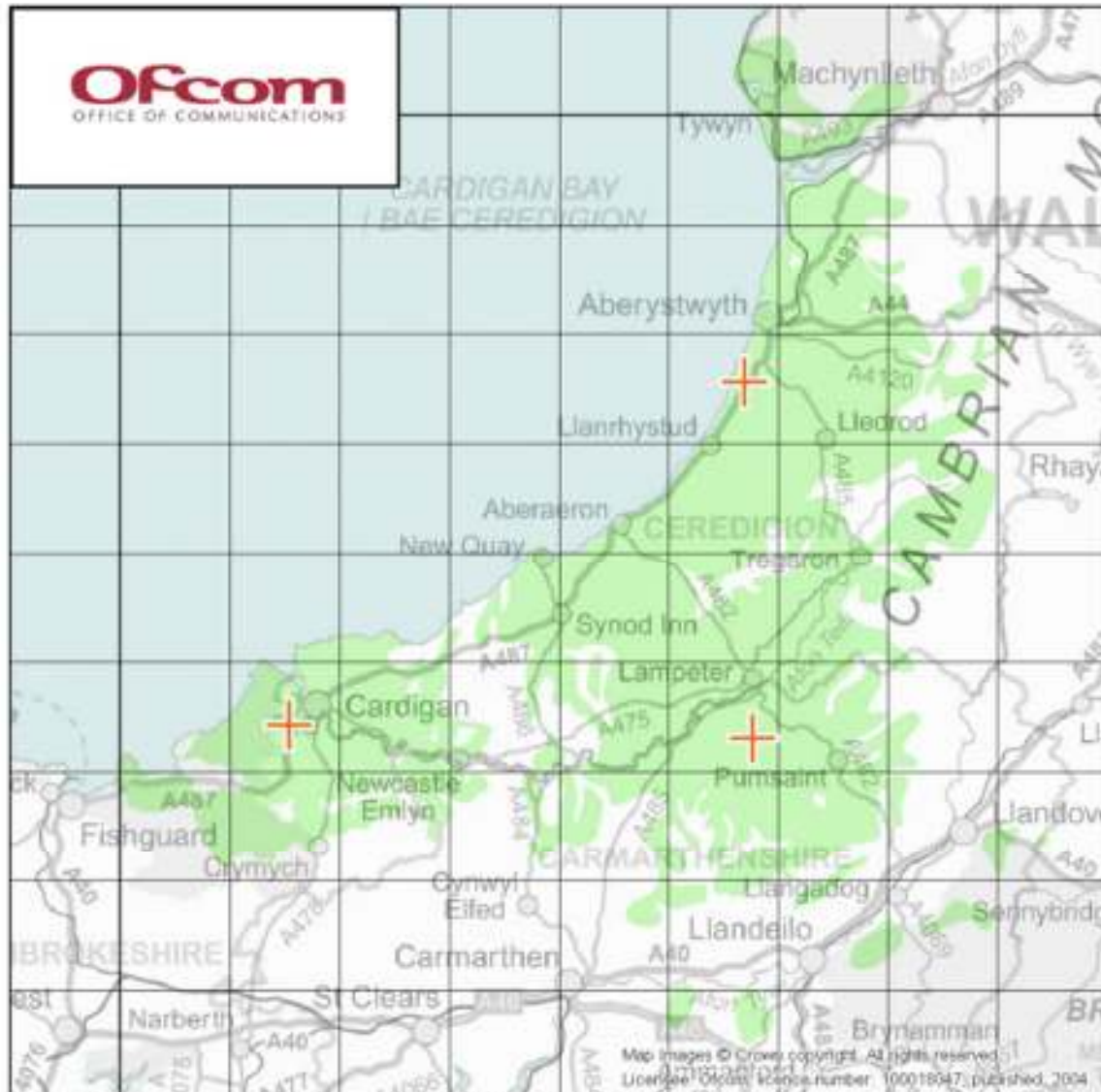
However, this is reduced to a loss of 14,617 people when factoring in the alternative version of the service operating on FM transmitters in Pembrokeshire and Carmarthenshire.

People 15+ served within MCA at 54dB - inc Preseli & Carmel		
Nation Radio AL102588 + Preseli 107.1 + Carmel 102.9 (current)	64,148	87.27%
Nation Radio (Blaenplwyf only) + Preseli 107.1 + Carmel 102.9	49,531	67.38%
Change	-14,617	-19.89%

When looking at coverage including DAB the loss reduces to 8,919 people.

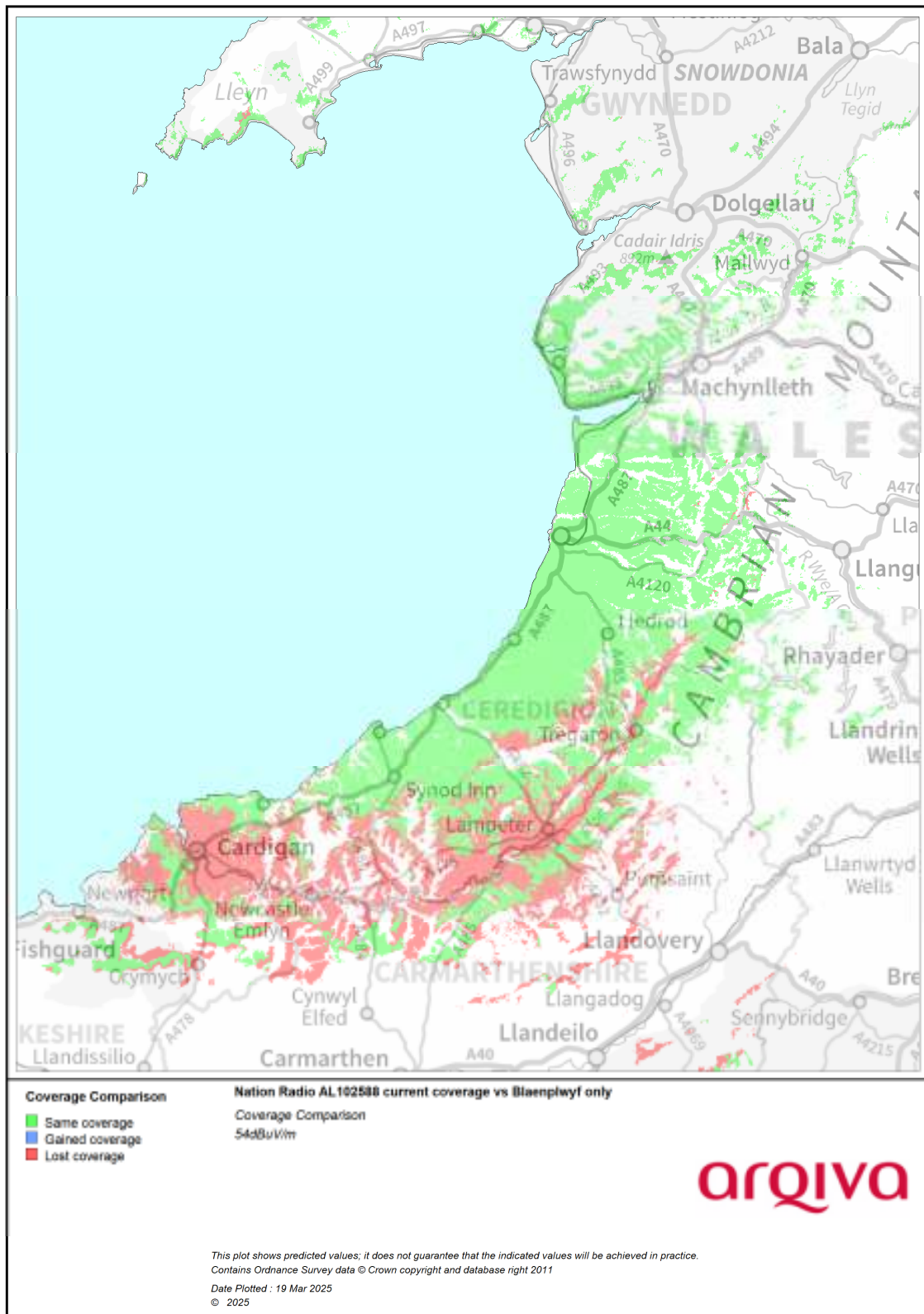
People 15+ served within MCA at 54dB/80%locations		
FM and/or DAB current	65,225	88.73%
FM and/or DAB new	56,306	76.60%
Change	-8,919	-12.13%

Before looking at the areas where this loss is concentrated, we would draw Ofcom's attention to the fact that the original MCA map (below) did not suggest contiguous coverage on the A487 north of Cardigan and geographic areas proposed to be lost (in red in the mapping that follows) do not necessarily equate to large population centres.

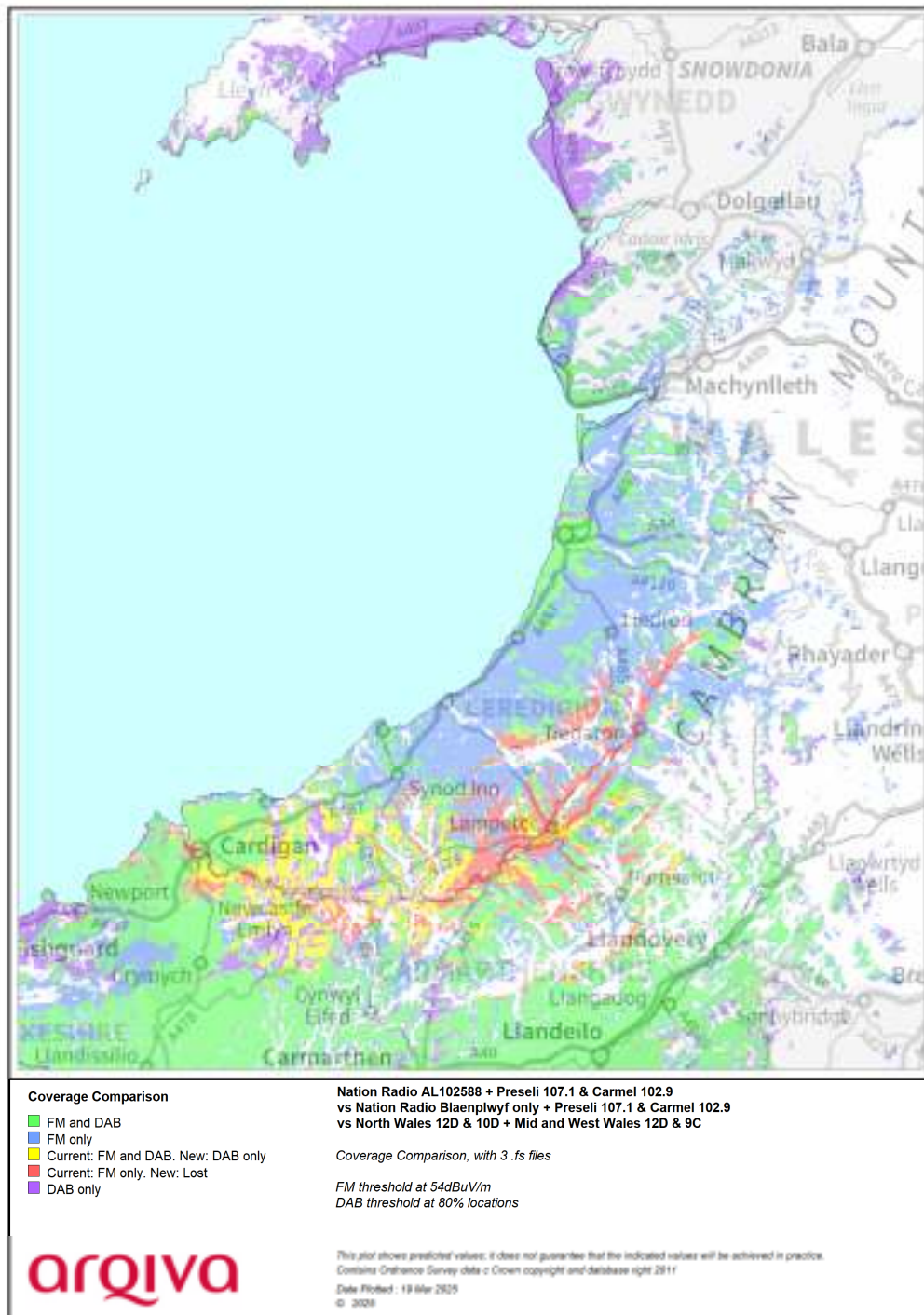


Ceredigion FM MCA (Radio Ceredigion) - 29th December 2003

We have also prepared mapping to demonstrate the losses (in red) which cannot be compensated by existing FM or DAB coverage of the current station. As expected the majority of the geographic area of the County is served by the continuing transmitter, however coverage would be lost in the Cardigan and Lampeter population centres.



We have provided further mapping of the impact of the changes when looking at ongoing coverage from 103.3FM and the local DAB multiplex in North West Wales alongside the alternative version of the station running on FM transmitters in Pembrokeshire, Carmarthenshire and the local DAB multiplex in Mid and West Wales – again the loss is marked in red and is concentrated around Lampeter.



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, Nation Radio will continue to be available to listeners in Cardigan on other platforms including DAB and online whilst we expect overspill of Nation Radio's other FM frequencies to cover some of the loss.

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. This can be found at <https://www.nationplayer.com/bigswitch/>

The existing station can continue be accessed online through devices such as Amazon Alexa by asking for Nation Radio North Wales / Nation Radio Ceredigion.

Over the course of 2024, Radio Ceredigion'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 the long term contract required by ~~SK~~ at license renewal combined with the costs of new equipment and the ongoing risk of equipment at ~~SK~~ requiring renewal we do not consider this a viable option.

Alternative supplier for transmission to reduce cost – Given the requirement for capital expenditure we do not expect it likely to achieve a material saving through this route. Ceredigion 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 predominantly employed directly or indirectly by ~~SK~~ 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 that may arise.

Alternative transmission site option – We believe that the sites currently used are the most effective at providing coverage, whilst any site change would incur considerable initial capital expenditure and disruption to signal during changeover.

Sale of the FM Business - We do not expect there would be any potential purchasers of the assets and therefore we do not contemplate the sale of the FM business as an option currently in scope in the time available.

Closure of the service on FM – this appears to be the most likely outcome should Ofcom be unable to accommodate this request and the existing service would then continue on DAB and online.

CONCLUSION

We have concluded that this request represents the best outcome to maintain choice for listeners in Ceredigion, prolonging FM transmission in the main population centre of Aberystwyth.

We believe that the alternative, which would almost certainly be the surrender of the FM licence, would result in outcomes which would more adversely impact the availability of a range of FM services in the area.

Martin Mumford
Company Secretary
Radio Ceredigion Limited

7 April 2025