

Key Commitments change request form

Community radio station name:	Horizon Radio (Milton Keynes)
Licence number:	CR100777BA/5
Licensee (company name):	Horizon Radio Limited
Contact name:	Chris Gregg
Date of request:	9/6/2026

Details of requested change(s) to Key Commitments

A community radio operator may apply to Ofcom to have the station's Key Commitments amended.

Please complete the table overleaf by including your current Commitment in the left hand column and your proposed revised Commitment in the centre column. In the right hand column please give a brief explanation as to why you wish to make each change.

We also require you to complete a second table which asks you to explain your proposed changes with reference to the statutory framework.

If you do not provide an explanation for your proposed changes and a completed comparison table, Ofcom cannot consider a Key Commitments change.

Please complete this form and return it to: broadcast.licensing@ofcom.org.uk

Existing Commitment (as in your published Key Commitments) Please only include one commitment change per row, and add more rows as necessary into the table.	Proposed revised/new Key Commitment	Reason for proposed change
1055 The Point is a radio service for people in Milton Keynes, and particularly the disadvantaged and those from diverse backgrounds.	Horizon Radio is a radio service for all people in Milton Keynes, including the disadvantaged and those from diverse backgrounds.	The proposed amendment is intended to provide greater clarity regarding the target community served by the radio station. The current wording refers to “people in Milton Keynes, and particularly the disadvantaged and those from diverse backgrounds”. While we remain committed to serving disadvantaged people and those from diverse backgrounds, the existing wording can be interpreted in different ways as to whether these groups form a subset of the wider Milton Keynes community or whether they should be regarded as the primary audience for all aspects of the service. The proposed wording, “all people in Milton Keynes, including the disadvantaged and those from diverse backgrounds”, more clearly reflects the way we deliver the service in practice. We serve the whole Milton Keynes community while ensuring that disadvantaged people and those from

		diverse backgrounds are included within that audience and continue to be represented through specialist programming, community information, volunteering opportunities and social gain activities. The change does not alter our commitment to supporting disadvantaged people and those from diverse backgrounds. Rather, it clarifies the intended scope of the target community and provides greater certainty regarding how the character of service is to be delivered.
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Statutory requirements

Under section 106(1A)(a)-(f) of the Broadcasting Act 1990 (as amended and modified¹) Ofcom must be satisfied that your proposed changes **meet at least one of the criteria referred to below**.

Please indicate which of these criteria you believe your proposed changes satisfy by deleting YES or NO as applicable and provide an explanation for why you consider a particular criterion is met in the relevant box. You should note that even if Ofcom is of the opinion that your explanation of your proposed changes meets one or more of these criteria, there may still be reasons why Ofcom is unable to consent to the change. When explaining your proposed changes, it is not enough to state that you believe one of the criteria is met. You must also demonstrate *why* you consider that at least one of these criteria is met.

In particular, if Ofcom is not satisfied that the changes would not substantially alter the character of the service (criterion (a) below), Ofcom cannot consent to the change without consulting on your proposals.² If this is the case, we will contact you to confirm that you are happy for us to consult on your proposed changes, and whether you wish to make any changes to your request in light of the need to make it public.

As part of our consideration of your request to make changes to your Key Commitments, we require applicants to provide an explanation for **at least one** of the criteria below.

(a) In your judgement would the proposed changes substantially alter the character of the service?	NO (Please explain why below)
In our judgement, the proposed change would not substantially alter the character of the service. The station would continue to provide a radio service for people in Milton Keynes and would continue to serve disadvantaged people and those from diverse backgrounds through specialist programming, community information, volunteering opportunities and wider social gain activities. The proposed amendment is intended to clarify the description of the target community rather than change it. The service would continue to operate with the same overall character and objectives, and the change would not materially affect listeners, volunteers or community organisations that engage with the station.	
(b) Do you consider that the proposed changes would narrow the range of programmes available by way of relevant independent radio services to persons comprising the relevant community?	NO (Please explain why below)
We do not consider that the proposed changes would narrow the range of programmes available by way of relevant independent radio services to persons comprising the relevant community. The amendment relates solely to clarification of the wording used to describe the target community within our Key Commitments. It does not affect the station's programme output, format, or scheduling, nor does it alter the range of services available to listeners in Milton Keynes.	

¹ As amended by sections 312 and 313 of the Communications Act 2003 and modified by the Community Radio Order 2004.

² Ofcom may approve a change under any of criteria (b), (c), (d) and (e) without consultation, or after a consultation of less than 28 days, if Ofcom considers that to hold a consultation at all, or for 28 days or more, would result in a delay that would be likely to prejudice the interests of the licensee. Ofcom may also remove for the purposes of consultation any confidential information submitted by the licensee.

The service will continue to provide the same mix of music programming, specialist shows, local information and community features, alongside opportunities for engagement with local presenters, volunteers and community organisations. Accordingly, the proposed wording change has no impact on the diversity or availability of radio programming within the relevant area.	
(c) Do you believe that there is evidence that, amongst persons comprising that community, there is a significant demand for, or significant support for, the changes that you have proposed?	YES (Please explain why below)
The station receives regular informal feedback from listeners, volunteers and local organisations indicating strong engagement with both our general service and our specialist programming for disadvantaged people and those from diverse backgrounds. This feedback is received through on-air interaction, social media engagement, direct contact with presenters and participation in station-led community activities. We also observe consistent engagement with our specialist programming and community-focused content, alongside continued participation from volunteers and community contributors representing a range of backgrounds within Milton Keynes. On this basis, we consider that there is demonstrable support for the continued inclusion of content for disadvantaged people and those from diverse backgrounds, alongside the wider service for people in Milton Keynes. The proposed change reflects a clarification of how this is delivered rather than a change in the underlying commitment, and therefore aligns with existing patterns of listener engagement and community involvement.	
(d) Do you consider that your proposed changes would be prejudicial to the access by members of that community to the facilities used for the provision of the service and for training in the use of those facilities?	NO (Please explain why below)
We do not consider that the proposed changes would be prejudicial to access by members of the relevant community to the facilities used for the provision of the service or for training in the use of those facilities. The proposed amendment relates solely to the wording of the station's Key Commitments describing its target audience and does not affect the operation of the station, the availability of studio facilities, or the arrangements for volunteer access, training, or participation. We will continue to operate the station in the same way, with open access to facilities for volunteers from the Milton Keynes community, including those from disadvantaged backgrounds and those from diverse communities, in line with our established training and participation processes.	
(e) Do you consider that the proposed changes would be prejudicial to the delivery of social gain resulting from the provision of the	NO (Please explain why below)

service provided under your licence?	
In our judgement, the proposed changes would not be prejudicial to the delivery of social gain under the licence. The station would continue to provide the same core social gain outputs, including opportunities for community participation, volunteer involvement, specialist programming, and the provision of information and content relevant to disadvantaged people and those from diverse backgrounds within Milton Keynes. The proposed amendment relates solely to clarifying the wording of the character of service description and does not reduce, remove or materially alter any of the station's existing social gain activities. We would continue to deliver the same range of community-facing initiatives, including on-air community information, engagement with local organisations, and opportunities for participation from members of the target community.	

Please set out below any additional information and/or evidence you wish to provide in support of your proposed changes. In particular, you may wish to outline how you think your proposed change(s) fit(s) within Ofcom's published guidance on changes to Key Commitments (https://www.ofcom.org.uk/data/assets/pdf_file/0017/31913/kc-changes-guidance.pdf).
We consider that the proposed amendment is consistent with Ofcom's published guidance on changes to Key Commitments, which recognises that amendments may be appropriate where they clarify the delivery of the existing character of service rather than fundamentally alter it. In this case, the proposed change does not introduce any new target audiences, programme types, or obligations. Instead, it clarifies the wording used to describe the station's existing target community in order to reduce ambiguity in interpretation and better reflect how the service is delivered in practice. The station continues to serve the whole of Milton Keynes as its core audience, while ensuring that disadvantaged people and those from diverse backgrounds are included within that audience and represented through a combination of specialist programming, community information, and wider social gain activity. We believe the proposed wording provides a clearer and more accurate description of the service and supports regulatory clarity without changing the fundamental nature or purpose of the licence.

Ofcom notes on the request

The request was AGREED, because Ofcom was satisfied in relation to Section 106 (1A)(a) of the Broadcasting Act 1990 (as modified by the Community Radio Order 2025,) i.e. that the change would not substantially alter the character of the service, and for the policy reasons given below.

The Licensee is requesting a change to the target community described in its character of service, from a service that is for “people in Milton Keynes, *and particularly* the disadvantaged and those from diverse backgrounds” to a service that is for “*all* people in Milton Keynes, *including the*

disadvantaged and those from diverse backgrounds” (requested changes to wording highlighted in italics).

The Licensee says that the change has been requested in order to bring greater clarity regarding the target community served by the radio station. It adds that the change will not alter its commitment to supporting disadvantaged people and those from diverse backgrounds, which it says it will demonstrate through specialist programming, community information, volunteering opportunities and wider social gain activities.

Ofcom is satisfied that this change has been requested primarily for the purposes of clarification and does not constitute a substantial change to the Licensee’s character of service. Ofcom recognises there is an argument that replacing “particularly” with “including” has the potential to weaken the prominence afforded to disadvantaged groups. The existing character of service provides the disadvantaged groups of Milton Keynes elevated status within the target community, whereas the proposed amendment places them alongside the wider population.

However, Horizon Radio’s licence will still retain a clear commitment to serving the disadvantaged and those from diverse backgrounds within Milton Keynes. The revised wording clarifies that the station is also for the general population of Milton Keynes, albeit that we would still expect to hear programming on the station which caters specifically for disadvantaged people and those from diverse backgrounds.

Due to the disadvantaged groups remaining specifically identified within the character of service, the surrounding commitments and structure remains unchanged. Given the Licensee expressly states in its application that it will continue to serve these groups through specialist programming and social gain activity, Ofcom is satisfied the proposal would not equate to a substantial change to the character of service.

In terms of our policy criteria, Ofcom is satisfied for the reasons set out above that the changes will not affect the station’s ability to meet the community radio ‘characteristics of service’ set out in the legislation, and there are no other policy criteria which would prevent us from implementing this change. We therefore decided to exercise our discretion to approve this change.

October 2026