

*"Working for quality
and diversity in
British broadcasting"*



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Response from Voice of the Listener and Viewer to the Department of Culture, Media and Sport 'Local Media Action Plan'

Voice of the Listener & Viewer (VLV) is an independent, non-profit-making association, free from political, commercial and sectarian affiliations, working for quality and diversity in broadcasting. VLV represents the interests of listeners and viewers as citizens and consumers across the full range of broadcasting issues. VLV is concerned with the structures, regulation, funding and institutions that underpin the British Broadcasting system.

VLV welcomes the general concept of television programmes made in and for distinct communities that cover a smaller area than the regional output of the current PSB services. This type of service is often found in other countries usually with a more federal constitution or covering much larger geographical areas which can result in a very strong local identity. In these countries there is usually a high penetration of cable TV provision. With our experience of PSB broadcast media during the many changes over the last 25 years VLV makes the following general points. We hope the Secretary of State will address them, especially news, before the formal competition is launched for the award of licences.

1. New Network Channel

We consider that the proposal to ensure the success of local television by incorporating it into a new national network is challenging in the current financial climate. There is also the possibility that local interests will be subordinated to the commercial requirements of the network. At a time when old-style networks are in transition is there a case for creating a new one? Before any further development takes place we consider that the existing PSBs should be approached to establish if, for example, one of their digital only channels might be a better vehicle for this project, although this would require a premium slot on the EPG. This was proposed in the interim Shott Review and not ruled out in the final report. Another possibility would be to utilise the existing Channel 5 – although this might not seem a natural fit with the new owner, the channel will need to justify its current PSB status.

2. Regulation to ensure quality programmes combined with adequate levels of funding.

(a) We consider these two principles - of quality and adequate funding - are inseparable and there appear to be unresolved dilemmas in the Action Plan. The need for quality programmes is seen as essential. The Action Plan and the Shott review states *'that audiences expect excellent quality television and the content must be sufficiently compelling to sustain audience viewership'*.¹ However the Action Plan also states that *'the licensing regime for the local services will be as light touch as possible to minimise costs and regulatory burdens.'*² There must be a regulatory regime in place to ensure quality of content and that a minimum amount of time each day to be given to local news.

¹ Action Plan page 12

² Action Plan page 12

(b) We agree that a key driver for local TV is news. However news, even with recent advances in technology, is still relatively expensive television especially to fund from advertising (ITV has given insufficient advertising revenue as a reason for withdrawing from some of this content at a regional level). Shott suggests that 20 hours a day of local television (10 stations at two hours each) can be provided for £25 million a year.³ We note that this is considerably less than the £75 million calculated to be the cost of a Scottish digital Channel. We consider that more work needs to be done on the costs of local television to ensure it is of sufficient quality to attract and keep audiences.

(c) There must be clear evidence that there will be adequate funding to ensure quality programmes in all genres produced locally.

3. Impartiality in news

We are concerned that neither in the Action Plan nor in the questions for this Consultation is the issue of impartiality of news coverage or the regulation of coverage mentioned. We were very concerned at the reference of sponsorship of local TV by a large corporation in Shott⁴. We note that the review draws attention to the AVMS directive and the problems of impartiality any sponsorship brings. There must be a clear regulatory framework in place to address impartiality and the issues at 2(a) above.

4. Coverage

This proposal has been rushed and therefore the coverage of each local service does not seem to have been fully considered and there does not appear to be an overall plan for the final coverage of the UK. The first 20 transmitters appear to have been selected with no thought to the nature of the communities they cover. This may be adequate to test the local TV concept. However VLV considers that before the formal competition is launched for the award of licences there needs to be a plan to ensure that the services rapidly cover distinct communities; that in the medium term both rural and urban areas will be served and that there is appropriate coverage in the nations. Without this inclusive approach there will be resentment and lack of interest in the majority of the population in the regions and nations who are not part of the initial experiment.

Many of the large conurbations appear to be served by existing regional services. Rather than launch services that fail to properly meet the needs of existing communities and that also fail to reach most of the UK it might be prudent to wait until the appropriate frequencies and/or technologies are available, for instance IPTV. We are also concerned that the adoption of IPTV breaks with the fundamental principle of free and universal access to public services.

In detail:

(a) VLV considers that to be truly local services must make a significant contribution to local democracy and therefore each service should cover a clear local area of political accountability (e.g. a local authority). Citizens need media services which can ensure democratic accountability from local administrations. This may not be possible with the current blanket coverage of terrestrial technology.

³ Shott page 26

⁴ Shott page 31

(b) VLV is concerned that local TV appears to be local urban TV, the word conurbations appears throughout the Action Plan. There is one sentence that recognises *localities outside of large conurbations have similar needs for local content*⁵. However, there is no indication of when this might be achieved. Local radio has been covering rural areas for many decades with services for large counties and in the case of the Nations local opt-outs.

(c) The nations are particularly poorly served by the initial plans with one transmitter in Wales for part of South Wales, one in Northern Ireland for the eastern parts of the province and two in Scotland serving Glasgow and Edinburgh.

5. BBC Funding

We are concerned that the present proposals mean that licence fee money will be used to set up a commercial service with no clear accountability to the BBC Trust, the guardians of the interests of licence fee payers. The BBC Trust must have overall control of the £40 million allocated to local TV under the current licence fee settlement. While this funding is part of the current licence fee settlement we oppose any further top slicing.

6. The Radio Option

Many in VLV consider that in the current economic situation it would make more financial sense to establish additional speech dominated local radio stations. These would achieve the same goals as local TV at a much lower cost using proven media. Local radio encouraged the take up of VHF. If digital transmission is used it might encourage a switch to digital devices as there would at last be some compelling content.

Consultation Questions at page 9 of the Action Plan

VLV considers that several of these questions require research into the needs and likely viewing habits of local communities when faced with a choice of national, regional and local TV. The research undertaken by Ofcom into local media did not address the detail of the consequences if local commercial television was launched in the form outlined in the action plan. Shott notes *individuals are interested in their local areas ... it does not necessarily translate that local TV will prove more attractive for them than the large range of choice available from existing – or other new – TV channels*.⁶ This research should be completed before the first licences are awarded.

We make the following comments on some of the questions:

The balance between local and network content

There must be two to three hours of local content each day at peak times. However this will be a challenge as local news should not clash with national and international coverage (see next section).

Local perspectives on local and international news

We have three concerns:

(a) News and current affairs should extend the outlook of citizens beyond their locality and nation. More purely local news can lead to increased parochialism. By contrast some of the current affairs output of the Gaelic TV service in Scotland demonstrates how a regional current affairs strand can have an international outlook. There must be UK and international

⁵ Action Plan page 15

⁶ Shott page 13

contexts to local news and if the concept of a “national spine” becomes a reality then this responsibility can be divided between the local and UK elements of the service.

(b) The local coverage must be truly local not just a platform for local “talking heads” to spout national news or policy; programmes must have a genuine local context. See 4(a) above

(c) The environment is a current concern in many localities and this should be a regular strand in current affairs programmes.

Content beyond news and current affairs

(a) Sport is a major element in much local television in other countries but we are not sure how much relevant coverage is available as many of the television rights appear to have been sold to the highest bidder, often the subscription channels.

(b) All local media has a responsibility to inform the community about local live entertainment and there should be coverage of all genres.

(c) BBC local Radio has a small but important faith strand reflecting the concerns and activities of local faith groups. There should be something similar in local television.

How local should the content be?

See 4 above

How do these issues differ across the devolved nations?

(a) The initial coverage as outlined in the Action Plan concentrates on urban conurbations. In the three nations where there are distinct communities scattered over a wide geographical areas, the devolved nations are poorly served by these proposals. (See 4 (a), (b) and (c) above.)

(b) The Welsh and Gaelic speakers of Wales and Scotland have services that broadcast in their first language. This provision must not be disturbed or reduced by the new proposals.

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Confidentiality Statement

There is nothing in this submission that is confidential

Contact for this submission

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