

**RadioCentre response to Department for Transport Consultation -  
Traffic Orders: Simplifying the Process (April 2012)**

## **1. Background**

- 1.1. RadioCentre is the industry body for commercial radio. Formed in July 2006 from the merger of the Radio Advertising Bureau (RAB) and the Commercial Radio Companies Association (CRCA), RadioCentre's membership comprises the vast majority of UK commercial radio stations, who fund the organisation. RadioCentre is governed by a board of directors, representing a cross section of the industry and including all the major commercial radio groups.
- 1.2. The role of RadioCentre is to maintain and build a strong and successful commercial radio industry – in terms of both listening hours and revenues. RadioCentre operates in a number of areas including working with advertisers and their agencies, as well as representing commercial radio companies to Government, Ofcom, copyright societies and other organisations concerned with radio. RadioCentre also provides a forum for industry discussion, is a source of advice to members on all aspects of radio, jointly owns Radio Joint Audience Research Ltd (RAJAR) with the BBC, and includes copy clearance services for the industry through the Radio Advertising Clearance Centre (RACC).

## **2. Summary**

- 2.1. RadioCentre welcomes this opportunity to respond to the Department of Transport's consultation on the draft proposals to modernise the process of publicising traffic notices. These proposals have the potential to enable all traffic authorities in England and Local Authorities, including Transport for London and the Highways Agency to communicate more effectively and engage with road users in a more cost-efficient manner.
- 2.2. The deregulations outlined in the draft guidance will grant traffic authorities the much needed freedom to determine the publicity channels for promoting traffic notices. In particular the authorities will have greater flexibility to take reasonable steps to identify the most appropriate method to reach the groups which will be affected by the change.
- 2.3. In this context we believe that radio is ideally placed as a central channel for communicating notices from traffic authorities, principally because of its extensive reach, ability to target specific geographic areas and communities and its competitive price. 46.7 million adults or 89.8% of the UK population listen to the radio every week, with 32 million of these tuning in to the commercial radio sector alone<sup>1</sup>. Radio is also the nation's second most-consumed medium after TV, accounting for over a quarter of the average adult's time spent with media across the day.<sup>2</sup> Crucially one fifth of radio listening takes place in vehicles – which means that radio is the most accessible media for drivers who require these notices.
- 2.4. Alongside commercial radio's reach and audience levels, public receptiveness to traffic notices is a key consideration. To address this we have undertaken research which found that over half of adults already use radio to find out about traffic updates and 64% of respondents would chose radio as the most appropriate media to inform them of traffic notices and orders.

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<sup>1</sup> RAJAR, Q4 2011

<sup>2</sup> IPA Touchpoints Study 3, 2011

2.5. As such a significant part of the media landscape commercial radio must be considered a key channel for publicising notices. Our ability to reach the majority of the population with national as well as locally-targeted output (and at no cost to listeners), should allow radio to be considered as an optimum media to advertise traffic notices.

### 3. Commercial radio in the UK

3.1. Radio is the most accessible and portable medium, it is freely available and effortless to consume. It reaches wide and diverse audiences, providing access to news and information to blind, partially sighted, disabled or older people who are harder to reach with other media. Research also suggests that radio plays a unique emotional role in the listener's life – lifting their mood when engaged in other tasks<sup>3</sup> – a role that other media are unable to fulfil to the same degree.

3.2. Radio not only entertains it informs listeners, playing a crucial role in providing updates on the issues that matter to them, locally and nationally. Despite competing with an increasingly diverse media landscape, UK radio continues to retain listeners, whilst traditional print media circulation declines. Commercial radio also plays an important economic role, particularly in local communities, where it supports local businesses by giving them a powerful means of communicating with local customers.

3.3. Audience measurement figures from RAJAR for 2011 show commercial radio audiences are holding steady with 32.8 million listeners tuning in every week<sup>4</sup>. Of this, a total of 27 million people listen every week to their *local* commercial radio station. As a consequence, local commercial stations offers strong competition to BBC local stations and leads with a 78% share of local listening<sup>5</sup>

3.4. This continued strength of commercial radio in providing popular entertainment and information is also complemented by its public service and social action role. RadioCentre undertakes an audit of the vital public service content of commercial stations in the report *Action Stations*<sup>6</sup>. The findings build a picture of the key contribution radio makes to local communities;

- On average commercial radio stations broadcast 8½ hours of public service content each week.
- 19 news bulletins are broadcast by each station per day, amounting to more than 300 minutes of news each week.
- Almost 70% of these news bulletins on commercial radio contain local news and include an average of 13 weather reports every day.
- Commercial stations broadcast an average of more than 80 travel reports every week.
- With 39 local commercial stations in Scotland, 11 in Northern Ireland, 16 in Wales and 232 in England, commercial radio remains fundamentally local.

3.5. **This local relevancy and immediacy of the medium reinforces radio's suitability to reach the target audiences for traffic orders, notices and consultations.** Not only do traffic and news

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<sup>3</sup> RAB, Media and the Mood of the Nation Study, 2011, <http://www.rab.co.uk/archived-pages/RADIO-the-Emotional-Multiplier>

<sup>4</sup> RAJAR Data Q4 2011

<sup>5</sup> RAJAR Data Q4 2011 – (calculated figures)

<sup>6</sup> Action Stations 2011, [http://www.radiocentre.org/files/2011\\_radiocentre\\_action\\_stations.pdf](http://www.radiocentre.org/files/2011_radiocentre_action_stations.pdf)

form a significant part of established radio speech broadcasts, listeners in vehicles are 20% of the overall total<sup>7</sup>, so traffic authority communications have a natural fit into the broadcast model as a paid-for spot (this is explained in more detailed below).

#### 4. The unique strengths of radio advertising

4.1 RadioCentre agrees with the Government that the current legal requirement for the single method of publicising traffic notices, orders and consultations in local and national press is outdated and requires revision. Not only is the current method ineffective in getting the messages to road-users and residents, it is also costly. The commercial radio industry is supportive of the Department of Transport's intention to open up the process to alternative and better utilised communication media.

4.2 We welcome the consultation's emphasis on deregulating these strict requirements as this will enable radio to be one of the media to be used in future, both as the single notification method and as a referring medium to council and traffic authority websites. The falling circulation of local and national newspapers highlights their inappropriateness as the *only* medium legislated to publish orders. This is in contrast to radio listening which remains extremely high and provides an advertising medium that is targeted, flexible, dynamic and affordable.

4.3 Advertising on radio offers a number of unique characteristics that are hugely valuable for promoting traffic authority notices:

- Radio is free to consume, delivering messages to large and diverse audiences, including those that are disadvantaged or hard to communicate with through other media (for example, it reaches those with low-literacy levels, the unemployed, those with no internet access).
- Radio is one of a few media that provides a local editorial perspective and can still be planned and bought on a local or regional level, enabling messages to be communicated with a local voice.
- Radio accounts for over a quarter of all time consumers spend with media and as a real-time, linear medium, available across many platforms and devices.
- As an audio-only medium, radio is a powerful emotional influencer and can use the spoken word effectively to speak with the voice of authority or the voice of the peer group as required, to best influence behaviour change.
- Radio advertising has been proven to deliver successful Government messages to people at the most relevant times to effect behaviour change – for example, reaching people with anti-speeding messages whilst they are driving as part of the DfT communication strategy for THINK!

4.4 To better understand the public perceptions and attitudes to traffic notices and orders, and the appropriateness of radio advertising for this particular type of message, RadioCentre has worked with the RAB's RadioGuage to run a survey of 800 radio listeners over a 4 week period.

4.5 Our findings revealed that on the whole, radio listeners already perceived the radio as one of the best mediums for traffic updates:

- **49% of people said they always or often use the radio** to source traffic and travel news on a daily basis.

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<sup>7</sup> Rajar, Quarter 4, 2011

- **57% of people said that 'breakfast' was the time that traffic and travel information was most needed.** This finding would help traffic authority's best schedule their advertising spots to reach the widest audiences.
- When asked about which media they would like to get traffic notices from, **64% of people selected Radio as either their 1<sup>st</sup> or 2<sup>nd</sup> choice in terms of an appropriate media to make them aware of road closure**

RadioCentre would like to ensure that this research is considered as part of this consultation as it reveals the relevant perspective of radio listeners, which provides further evidence to support our response.

## 5. Advertising on radio versus other media

- 5.1. Radio is a medium that works to engage the listener on a range of levels. Research has been undertaken to establish which media engages the audience at the highest level and what attempt can be made by the audience to avoid advertisements.<sup>8</sup> For example, TV viewing has high avoidance levels as viewer change channels often (and increasingly skip ads when using PVRs); newspapers are read in way that can avoid advertisements; and yet people rarely retune the radio to avoid adverts. In fact radio's avoidance score is joint-lowest (with cinema), and its engagement score is average across the spectrum of media. Newspapers on the other hand have the highest avoidance levels – approximately twice as high as radio and cinema at 37%. Newspapers also have the lowest engagement score.
- 5.2. Only 18% of the population read a national newspaper on an average day and regional newspaper circulation has declined by 29% over the past 5 years<sup>9</sup>. This falling circulation of local and national newspapers highlights their inability to reach the population.
- 5.3. RadioCentre also welcomes the proposed deregulation because the requirements for notices will be less restrictive and no longer be required to publicise the same road closure multiple times. This gives radio an opportunity to creatively develop advertising briefs to meet these criteria in a way that is not possible with press.
- 5.4. These messages could work as traditional spot ads between programming, but following changes to the Ofcom Broadcasting Code at the end of 2010 there is also the ability to incorporate paid-for commercial references into editorial content. This could enable priority messages to be read by presenters or even explained by a spokesperson for traffic authorities if appropriate. However, decisions on the precise nature of messages and their execution will ultimately be made between the traffic authorities and the radio station (with input from specialist advertising agencies as required).
- 5.5. Traffic authorities (and other organisations that are required to publicise notices) will also need to ensure the notices produced for radio can engage and inform. As we understand it the notices and orders will still require a large amount of information to be relayed, which may lend itself more to short, informative and lively messages with a website referral to ensure further details are accessible. This type of online 'sign-posting' is recommended in the consultation as a way of centralising the full information on micro-sites such as the Highways Agency.

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<sup>8</sup> <http://2011.rab.co.uk/archived-pages/Ad-Avoidance>

<sup>9</sup> *What Do We Mean By Local?* Ed John Mair, Neil Fowler and Ian Reeves, (2012, Arima Publishing)

- 5.6. Fortunately radio adverts have established potential as a referring point for online information. Traffic Authorities choosing to advertise on radio would be extremely well placed to broadcast a short message referring point to a website, which will have full notices and consultation documents. Research by the RAB has uncovered how radio adverts promote an online multiplier effect, which means that radio is 4x more cost-effective than other media combined at driving people online.<sup>10</sup>
- 5.7. Commercial radio stations already have established online presence and pages dedicated to local community activity, news and traffic updates. A radio stations own website should be considered by authorities as a further place to include publicity for these notices this exemplifies the synergy between radio listening and online browsing.

## 6. Radio's success in communicating government messages

- 6.1. Radio has a very successful track record of working with the Government on a range of COI campaigns. In fact it has been calculated that, for every £1 the COI has invested in radio, Government has benefitted from nearly £1 in added value. Therefore, in return for the £151.8m spent by Government on radio advertising over the past five years, the industry has provided Government with £133.3m in added value.
- 6.2. A relevant example of radio's effectiveness was in 2008, when radio advertisers worked with the COI to promote the THINK! brand in 2008 and prompted a re-appraisal of poor road safety behaviour by getting people to take responsibility for the consequences of their actions. The result was casualty reduction targets achieved two years ahead of schedule. THINK!'s contribution was to prevent over 3,000 deaths and serious injuries during this period, representing a saving to society of over £800m and generating payback of £9.36 for every £1 spent on the campaign<sup>11</sup>.
- 6.3. As noted above one of the advantages of using radio to advertise is that it is an incredibly cost-effective advertising medium and is proven to deliver results:
- Radio delivers audiences for advertisers far more efficiently than any other editorial medium,
  - For example, according to media agency estimates, pound for pound, a media budget spent on radio delivers 2.5 times more adults than TV and almost 8 times more adults than online display.
  - Pound for pound, a media budget spent on radio delivers over 3 times more 16-24 year olds than TV; 2.5 times more 16-24 year olds than online display, and eight times more 16-24 year olds than cinema.
  - Pound for pound, a media budget spent on radio delivers almost 3 times more ABC1 adults than TV, and almost four times more ABC1 adults than online display.
- 6.4. Nineteen Government radio campaigns have been measured on the RAB's RadioGauge (which is an on-going radio campaign measurement tool) between 2006 and 2010, demonstrating how the medium has enhanced awareness of and cut-through of specific messages within the media mix. This has found that radio advertising gives an average uplift in awareness of 50%.<sup>12</sup>

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<sup>10</sup> [http://www.rab.co.uk/rab2009/publicationDocs/RAB\\_OnlineMultiplier.pdf](http://www.rab.co.uk/rab2009/publicationDocs/RAB_OnlineMultiplier.pdf)

<sup>11</sup> Figures from the Institute of Practitioners in Advertising Effectiveness Awards

<sup>12</sup> <http://www.rab.co.uk/helpful-tools/radiogauge>

## 7. Conclusion

- 7.1. RadioCentre welcomes the public notice plan as this is great opportunity to move forward and allow commercial radio to be part of ensuring that public traffic messages are more effectively delivered.
- 7.2. The falling circulation of local and national newspapers highlights their inappropriateness as the current communication channel to publish orders. Not only is the current method ineffective in getting the messages to road-users and residents, it is also costly and should be modernised to free up the process to alternative mediums. Radio audiences remain high on a local and national level and it has proven effectiveness at reaching diverse audiences.
- 7.3. Radio is one of a few media that provides a local editorial perspective and can still be planned and bought on a local or regional level, enabling a localism which is not always available in other media. Messages can be communicated with a local voice and scheduled in an informative manner to compliment news and traffic bulletins. In addition, commercial radio stations each attract specific listener profiles, enabling clients to plan radio advertising that considers of the demographics of who they are trying to notify with a good deal of accuracy.
- 7.4. RadioCentre and RAB (and no doubt individual commercial radio stations and groups) would be happy to support traffic authorities and all potential advertisers of traffic communications to assist in planning advertising. RAJAR is the radio industry's audience measurement system, and agency media planning tools will use RAJAR data to help identify the most efficient schedules by target audience and by region. All advertising can be planned by local sales teams to ensure that the message is scheduled at the best time to reach the right audience.
- 7.5. RadioCentre is supportive of the initiative in the Draft Guidance to change the regulations and remove the requirements of how notice should be given when a traffic order is made, as well as the decision making process outlined to select the most suitable channels for communicating to those affected. This is a crucial part of opening up the communications opportunities for traffic orders so that they can include radio.
- 7.6. In the longer term, the radio industry would like to see Government build a clear plan for the future communication of all public notices and the use of different media. A simple process of modernising statutory public notices could save £22.5M of local and central Government funds<sup>13</sup>. Radio can be a cost-effective option for more flexible and innovative measures to meet consumer demand and offer an accessible range of information channels. We welcome the Governments attention on the communication of all statutory notices and call for the consideration of media-neutrality, rather than a continued reliance on press.

### RadioCentre, April 2012

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<sup>13</sup> Communities and Local Government, 'Publicity for planning applications: A consultation'. July 2009, p.26