

## **RadioCentre's response to BBC Trust service review of BBC Local Radio**

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## 1. Overview

- 1.1 **The key determiner of distinctiveness for BBC Local stations is their localness.** Where necessary the BBC Trust should use the service licence review as an opportunity to adjust the remit of local radio services to enhance their public service credentials and better serve their local communities. This means avoiding networked content, playing unique music and increasing its focus on local news.
- 1.2 **RadioCentre does not believe that less money should mean less distinctive output.** While we understand that the BBC needs to make savings to meet the terms of its licence fee settlement, we do not accept that this should inevitably lead to its most distinctive output being diluted. From our commissioned study into BBC staffing, we estimate over £22 million could be saved without the need for networking.
- 1.3 **BBC Local Radio stations could offer even more distinctive and high quality speech content considering the resources at their disposal.** Even if the cuts are not as deep as expected, this process presents an opportunity to re-evaluate how to improve the value of these services. Although much of the output is distinctive and should be sustained, RadioCentre believes there is room for improvement in the types and amounts of speech content.
- 1.4 **BBC Local Radio is part of BBC News division and firmly belongs there.** The stations were founded with a commitment first and foremost to news, and continue to provide a vital news source for specific licence-fee paying groups. This means higher commitment to news; which translates to investment in journalists (rather than 'talent') and less music.
- 1.5 **BBC Local Radio should continue to focus on older audiences and consider increasing its target age to 60+.** Many local listeners are not catered for anywhere else and this target audience will increase with an ageing population. There should be a particular focus on programming aimed at listeners aged over 65.
- 1.6 **BBC Local Radio and local commercial stations must offer complementary services.** Localness is fundamental to commercial radio's business model and it will remain committed to local content regardless of regulation, economic conditions and public funding. However, it delivers localness in a different way to a different audience.
- 1.7 **If the DQF proposals do go ahead they will require a Public Value Test first.** It is critical that this takes into account the complementary nature of BBC Local Radio and local commercial radio, so this is retained and strengthened and not destabilised by these changes.

## 2. Executive summary

- 2.1 **Commercial radio acknowledges and welcomes the value and quality of BBC Radio.** We recognise that a healthy, flourishing BBC is required to ensure radio remains relevant to all sectors of society. Local radio is a fundamentally important component of the UK's media market. A thriving and sustainable local media sector is a vitally important part of the UK's social, cultural and democratic landscape, and the BBC plays a key role.
- 2.2 **RadioCentre continues to emphasise the responsibility of BBC services to be distinctive.** We believe the unique content which should be consistently available on BBC services should not be sacrificed in exchange for improved reach, or reduced to deliver financial savings. Within the UK's local media markets the BBC and commercial radio currently play largely complementary roles in serving local audiences, but BBC Local Radio must strive to offer licence fee payers something which they cannot get elsewhere.
- 2.3 We recognise that the BBC Trust's service licence review process seeks to answer the following issues about BBC Local Radio:
- How well does BBC Local Radio perform against the terms of its service licence
  - If the future strategic direction for BBC Local Radio is well-considered
  - If the service licence for Local Radio be changed to improve performance or change the future direction
- 2.4 **The recent Delivering Quality First consultation has become unavoidably intertwined with the BBC Local Radio service licence review.** As part of our response, we therefore examine the impact of the proposed changes to BBC Local Radio alongside its current performance. We identify that, regardless of the outcome of these proposals, it is now nevertheless an ideal opportunity to consider the efficiency of these services regardless of the outcomes of DQF.
- 2.5 RadioCentre commissioned David Lloyd, who has extensive experience in commercial radio, BBC Local Radio and as a regulator, to determine financial savings which could be made at BBC Local Radio whilst maintaining content levels and independently evaluate how the DQF proposals will impact on the service.
- 2.6 Alongside David's analysis we determine in this response that content sharing (particularly in daytimes) could unjustifiably dilute the distinctiveness, quality and localness of BBC Local Radio, unless there were guarantees that unique speech content would be delivered. Instead we recommend that the BBC examines back office functions as a more effective cost-cutting measure.
- 2.7 **Public value must be the central mission of BBC services due to its unique funding and responsibility to licence fee payers.** It is therefore at the centre of this response. We propose changes to the service in order for it to offer even greater public value through local speech based content.
- 2.8 Some BBC Local Radio services have adopted traits of commercial services and the uniqueness and value of the service has been diluted as a consequence. We believe that, in order to fulfil their remit and add plurality to the local media sector, these BBC services must strive to be as local, and speech focused as possible at all times. Where music is played, it should be different to any other offerings in the UK radio market.

- 2.9 In order to deduce the public value being offered currently by BBC Local Radio, we commissioned content analysis of a cross-section of BBC Local and commercial stations at core hours on 9 November 2011. We determined that much of the entertainment content and sweeping national issues covered in the speech were not what we would consider to be the best journalism available for that area, and that BBC Local Radio music can lack distinctiveness.
- 2.10 We note as part of the BBC Local Radio service licence that station output is monitored by the Trust on an annual basis. We recommend the Trust undertake a more regular monitoring of station output by a similar specialist third party in order to more effectively gauge the public value of the wide range of stations within the BBC Local Radio network.
- 2.11 **Fundamentally BBC Local Radio needs to echo the mantra of BBC Public Purposes.** We therefore structure our analysis by examining the BBC's six public purposes in turn. If the BBC does believe that every service should feature these purposes to the extent that they are included in the service licence, we expect them to be prominent in its output.

### 3. Background

- 3.1 The first BBC Local Radio stations were founded, initially as part of a two-year trial, with the guiding principle of offering modern radio-journalism geared to the interests of the local community<sup>1</sup>. The 1966 White Paper regarding BBC Local Radio stated that:

*'...the station would provide the missing link of communication. Day after day, it would be talking to the citizens about their own town, bringing them into contact with each other, engaging their interest and participation, telling the running serial story of local life and building the satisfying and rewarding sense of the larger sense of the larger town and family.'*<sup>2</sup>

- 3.2 The first station, BBC Radio Leicester, opened on 8 November 1967. It was joined by eight others in cities around England in the next three years, and by the early 1970s there were 20 stations. The broadcast reach of some of the early BBC radio stations, initially covering towns or districts, expanded to cover a county. Radio Medway, for example, became Radio Kent. A further tranche of stations then went on air, bringing BBC Local Radio to the whole of England.
- 3.3 Whilst the BBC expanded across the counties of England, commercial radio was being founded by looking at more local urban areas. On 8 October 1973 LBC was launched in London. A week later it was followed by Capital Radio, and then stations in Glasgow, Birmingham and Manchester soon after<sup>3</sup>.
- 3.4 Commercial radio's particular focus on urban audiences complemented the BBC's own radio offering. Indeed rural BBC Local stations continue to tend to perform more strongly, and be more valued than urban equivalents due to the lack of competition in those areas from commercial equivalents.

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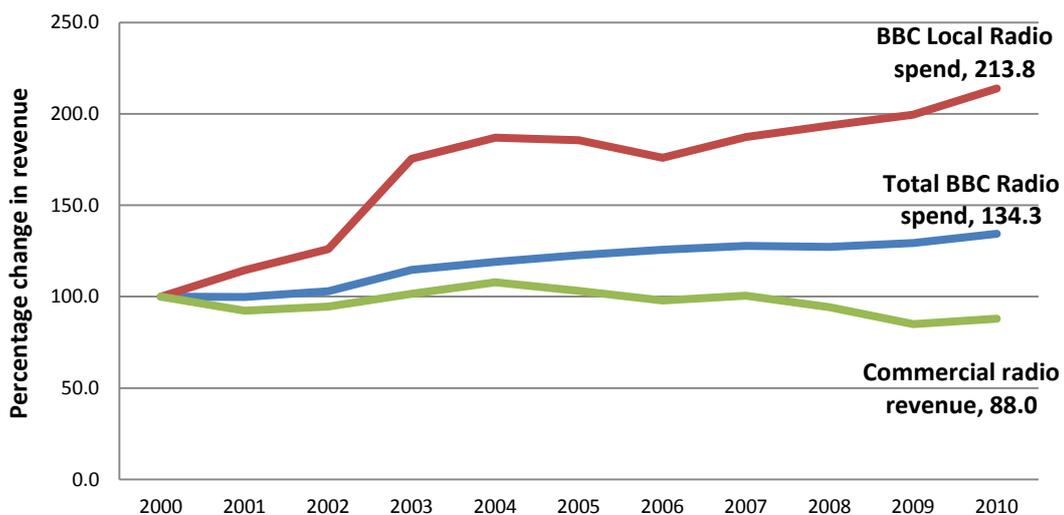
<sup>1</sup> Leonard Mial, 'Obituary: Fran Gillard', *Independent*, 23 October 1998. <http://www.independent.co.uk/arts-entertainment/obituary-frank-gillard-1179964.html>

<sup>2</sup> Sourced from: BBC, *BBC Local Radio – 2000: A review for a new era*, 1999, p. 18.

<sup>3</sup> RadioCentre, 2011. [www.radiocentre.org/facts](http://www.radiocentre.org/facts)

- 3.5 **This complementing of services in the market allowed both commercial radio and BBC Local Radio to flourish.** The majority of the BBC Local network was in place by 1990, and despite changes in the UK economic and media landscapes, has remained broadly in that state ever since.
- 3.6 Meanwhile commercial radio has also evolved, and while stations remain committed to the provision of local content and rooted in their local communities, the sector is increasingly developing strong regional and national popular music services. This can both increase quality of output and make financial sense due to the economies of scale. These changes have followed a decline in advertising levels in recent years, as a recession has exacerbated radio display advertising migrating online.
- 3.7 In contrast, **BBC expenditure in radio has remained buoyant throughout a difficult financial period due to the growth in the licence-fee.** According to its latest Annual Report, the BBC spends £147.5 million overall on BBC Local Radio<sup>4</sup>. This is more than double the £69 million invested in 2000. Commercial radio revenue for eight times the amount of stations was £523 million in 2010, a decrease of 13.7 per cent in the same time period (see Figure 1 below).

**Figure 1: Index of BBC Local Radio spend vs. commercial radio revenue since 2000**



BBC figures from Ofcom Communications Market Reports & Corporation Annual Reports, commercial radio figures courtesy of RAB

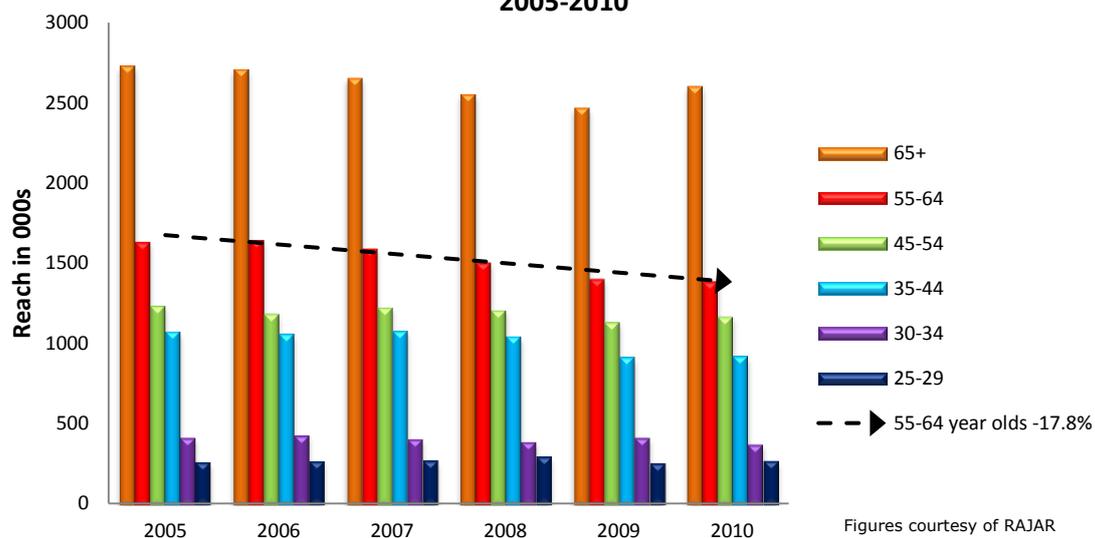
- 3.8 **The recent investment in BBC Local Radio by the BBC has not been mirrored by an increase of listeners.** In 1999, the BBC published the 'Local Radio 2000 project' which recognised the threats of competition and looked to target new listener groups in order to grow reach and justify the expenditure on the stations. By 2005, the situation had become so precarious in the eyes of BBC Management that Local Radio stations began targeting a precise profiled listener 'Dave and Sue' and known internally as 'Project Bullseye'<sup>5</sup>.

<sup>4</sup> BBC, Annual Reports 2001-2011. <http://www.bbc.co.uk/annualreport/download/index.shtml>

<sup>5</sup> David Self, 'Meet Dave 'n' Sue', *New Statesman*, 28 February 2005. <http://www.newstatesman.com/200502280033>

- 3.9 Project Bullseye appeared to miss the target. Over the past five years, BBC network stations' share rose, while that of BBC local stations fell. The weekly reach of all local commercial radio rose by 4 per cent between 2005 and 2010, but in contrast BBC Local stations lost 10 per cent of their audience. This is despite BBC Radio as a whole gaining 5 per cent more listeners in the period<sup>6</sup>.
- 3.10 **What is surprising about the BBC Local listener base is that it is falling significantly in core communities which should be specifically targeted by BBC services, as they are not catered for explicitly anywhere else.** In England, where the BBC and commercial radio both have local radio stations, their roles are nevertheless still largely complementary due to the BBC's prescribed service licence focus on those aged 50 years and older and more disadvantaged<sup>7</sup>.
- 3.11 Despite an aging population in the UK and the average age of people who are over 50 years old is now 64.3<sup>8</sup> in the last five years the most significant decline (17.8 per cent) in BBC Local listeners over 25 years of age has been amongst listeners between 55 and 64 (see Figure 2 below). The average age of BBC Local listeners is now 54, increasing by only a year since the service licence process began in 2008<sup>9</sup>.

**Figure 2: Over 25 demographic of BBC Local Radio  
2005-2010**



- 3.12 Similarly, BBC Local Radio station managers and Members of Parliament highlight the contribution BBC Local Radio makes to the disadvantaged social groups. From 2005 - 2010 C2DE radio listeners have decreased by only 0.4 per cent in the UK, yet in the same period 25 per cent fewer DE listeners tuned into BBC Local Radio. This might imply that the content of this service does not appeal to these groups as much as it once did<sup>10</sup>.
- 3.13 Older radio listeners are increasingly important and there is an opportunity here for BBC Local Radio. According to Rajar figures for all radio, 55-74 year olds now listen longer to radio on average than any other group, in addition listening amongst 65-74 year olds is

<sup>6</sup> RAJAR 2005-2010; figures aggregated.

<sup>7</sup> BBC Trust, 2011. *BBC Local Radio Service Licence*, p. 1.

[http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory\\_framework/service\\_licences/radio/2011/english\\_local\\_radio\\_apr11.pdf](http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory_framework/service_licences/radio/2011/english_local_radio_apr11.pdf) and Paul Chantler & Peter Stewart, 1992. *Essential radio journalism*, p. 6.

<sup>8</sup> Office of National Statistics, population estimate as of 16 December 2011.

<sup>9</sup> RAJAR, Q3 2008 – Q3 2011.

<sup>10</sup> RAJAR 2005-2010; figures aggregated.

currently the most rapidly increasing listenership in the entire radio market at 6.29 per cent growth year on year<sup>11</sup>. Despite a gradual fall in overall radio market listening hours across all age groups since 2005, people aged over 75 were listening to 6.9% more radio in 2010 than five years before.

- 3.14 Indeed we would expect BBC Local Radio to take the opportunity provided by the service licence review to refocus its efforts on serving older audiences, with its target age being increased from 50+ to 60+ to reflect both its mission to provide a service to this audience and the UK's ageing population.

## **4. Delivering Quality First Proposals**

### **4.1 Strategy Review**

- 4.1.1 In March 2010, the BBC Trust published proposals for the Executive's future strategy of *Putting Quality First*. We were pleased to note that BBC Management reaffirmed 'a renewed emphasis on speech radio and journalistic content' for BBC Local services, but many of the detailed proposals lacked vigour and ambition.
- 4.1.2 The broad commitment to focus BBC Local Radio on older audiences was welcome, but the proposal to shift its remit to over 55s was limited (and has yet to be implemented and incorporated in the service licence). Many of the other proposals in the strategy review, such as 'current and recent chart hits representing no more than 15% of weekly music output', simply reproduced current service licence conditions<sup>12</sup>.

### **4.2 Delivering Quality First**

- 4.2.1 Delivering Quality First (DQF) is the final consultation on the proposals designed to shape the future strategy of the BBC. These proposals have ultimately been framed by the new licence-fee settlement, which will necessitate 20 per cent cost savings. BBC Local Radio has been impacted by these cuts to such a degree that much of the DQF debate has been framed by BBC Local Radio proposals.
- 4.2.2 **RadioCentre would welcome a re-evaluation of the DQF proposals regarding BBC Local Radio.** If the BBC is to deliver quality first, radio measures should be more radical than the incremental salami-slicing proposed. A more long-term strategic approach to the reduced circumstances the organisation face should be suggested, which tackles the BBC's dominance and growth of audiences served by the commercial sector (especially 25-44s) instead of diluting the public service output provided by local radio.

### **4.3 Expert analysis**

- 4.3.1 To give better context to the impact the proposals will have on the service provided, RadioCentre commissioned David Lloyd, currently Director of Programming & Marketing at Orion Media, to evaluate how the proposals will alter output. As part of this analysis, David

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<sup>11</sup> RAJAR, 2009-10 in Ofcom, 2010. *Communications Market Report: UK*, p. 163. [http://stakeholders.ofcom.org.uk/binaries/research/cmr/cmr11/UK\\_Doc\\_Section\\_3.pdf](http://stakeholders.ofcom.org.uk/binaries/research/cmr/cmr11/UK_Doc_Section_3.pdf)

<sup>12</sup> BBC, 2010. *BBC Strategy Review*, p. 43. [http://downloads.bbc.co.uk/aboutthebbc/insidethebbc/howwework/reports/pdf/strategy\\_review.pdf](http://downloads.bbc.co.uk/aboutthebbc/insidethebbc/howwework/reports/pdf/strategy_review.pdf)

has determined an alternative approach which could bring the necessary savings at BBC Local Radio whilst maintaining value.

- 4.3.2 David Lloyd has worked in radio for over thirty years. He was a Group Programme Director of the regional Century network of commercial stations in the late 1990s and previously worked for the BBC as a Head of Local and Regional Programming; where he was asked by the then regional controller to undertake a similar piece of work in determining efficiencies.
- 4.3.3 In summary David believes that the service costs far more than it should because **BBC Local Radio is unnecessarily modelled on national BBC Radio and TV equivalents**. He recommends that many of the cost savings for BBC Local Radio need to be made in back-office functions rather than in production areas, to ensure a focus on consistency. David's analysis, including several proposals, can be found attached to this document at Appendix 1 and was used to inform the RadioCentre approach below.

#### **4.4 Networking**

- 4.4.1 DQF proposes to end local afternoon and evening shows on weekdays, and a shared output. From 7-10pm all stations would link into an 'All England Programme'. Weekend plans are so far undecided, but will see higher repeats and much reduced sports teams for live coverage.
- 4.4.2 Significant cost savings can be achieved by reducing the number of broadcast production locations. However, **it may be difficult for the BBC to increase the distinctiveness of its local radio services if it adopts this networking approach**.
- 4.4.3 In his analysis David Lloyd considers that peak time services should not be enhanced at the expense of off-peak content, which is essentially what is being proposed in DQF<sup>13</sup>. As David outlines, off-peak networked programming will ultimately become the territory of 'high-impact presenters'<sup>14</sup> found on other national radio networks with the sole aim of increasing reach and offering little public value to BBC Local Radio.
- 4.4.4 **A networked regional radio programme would only bring value to the listenership in off-peak times as an opportunity to provide the equivalent of BBC regional television news.** To be completely distinctive from other BBC or commercial content, a regional BBC Local show would need to be 100 per cent speech content and entirely about local news, and would be best limited to evening output.

#### **4.5 Staff reductions**

- 4.5.1 DQF proposes that of the 1,384 staff working at BBC Local stations 280 jobs will be cut, a reduction of 20 per cent. David Lloyd has constructed a theoretical model of an average station of approximately 25 staff members; offering a potential reduction of over a third of current £66.2 million staffing costs. Much of these reductions come from halving management posts whilst merging back office functions for economies of scale.

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<sup>13</sup> BBC, 2010. *BBC Strategy Review*, p. 43.

[http://downloads.bbc.co.uk/aboutthebbc/insidethebbc/howwework/reports/pdf/strategy\\_review.pdf](http://downloads.bbc.co.uk/aboutthebbc/insidethebbc/howwework/reports/pdf/strategy_review.pdf)

<sup>14</sup> BBC Trust, 2011. *Service review: The BBC's national radio stations in Northern Ireland, Scotland and Wales*, p. 47.

[http://www.bbc.co.uk/bbctrust/assets/files/pdf/our\\_work/nations\\_radio/2011/nations\\_radio\\_review\\_full.pdf](http://www.bbc.co.uk/bbctrust/assets/files/pdf/our_work/nations_radio/2011/nations_radio_review_full.pdf)

- 4.5.2 While it is difficult to comment on the detail of these changes we are led to understand that the synergies between BBC Local Radio stations could be improved. Part of the problem with forty individual stations which have grown up independently of one another is that there appears to be limited information and resource sharing at a back office level, which makes no economic sense.
- 4.5.3 **Stations could make more of their economies of scale to drive efficiency.** As highlighted by David Lloyd's analysis, there is currently common role duplication across the network. All back-office administration, alongside the audio production, some of the general music play-out and promo scheduling which does not have to be undertaken by a local team, could be successfully centralised.
- 4.5.4 In the Trust's conclusions regarding the BBC Nations review, it determined that a benchmarking group made up of finance and editorial staff from each station be established to standardise processes between the stations, and RadioCentre again recommends a similar back office function for BBC Local<sup>15</sup>. This responsibility could be under the newly expanded roles of redefined heads of local and regional programming David Lloyd discusses in his paper.

#### 4.6 Content sharing

- 4.6.1 RadioCentre notes that the Controller of BBC English Regions David Holdsworth recently actively encouraged proposals regarding the sharing of studio and office premises with commercial counterparts whilst speaking at the Radio Festival in Manchester<sup>16</sup>. RadioCentre is happy to encourage its members to approach the BBC regarding these conversations, but these arrangements can be difficult to deliver depending on individual circumstances of stations. However we would also suggest that these considerations could be extended to explore the sharing or co-creation of content.

#### Recommendations:

- In line with the National BBC offerings, the value of BBC Local Radio should not only be calculated by cost per listener hour but by examining audience appreciation statistics.
- BBC Local should network back office functions, and create regional benchmarking groups to standardise costs.
- Senior management positions should be reduced before any other cost efficiency decisions are made regarding BBC Local Radio.
- If networking does occur, it should be in the form of a repositioned team of local journalists, focused on local news reporting.

<sup>15</sup> BBC Trust, 2011. *Service review: The BBC's national radio stations in Northern Ireland, Scotland and Wales*, p. 20.

[http://www.bbc.co.uk/bbctrust/assets/files/pdf/our\\_work/nations\\_radio/2011/nations\\_radio\\_review\\_full.pdf](http://www.bbc.co.uk/bbctrust/assets/files/pdf/our_work/nations_radio/2011/nations_radio_review_full.pdf)

<sup>16</sup> Radio Academy, 2011. *RF 2011 ROOM 2* <http://www.radioacademy.org/events/radio-festival-2011/rf2011-programme/rf-2011-room-2/> [Audio clip]

## 5. Delivering public value – Performance Analysis of BBC Local Radio

### 5.1 Public value content analysis

5.1.1 Our evaluation of the public value offered by BBC Local Radio examines how well the service fulfils the six purposes listed within the BBC Local Radio service licence:

- Sustaining citizenship and civil society
- Promoting education and learning
- Stimulating creativity and cultural excellence
- Representing the UK, its nations, regions and communities
- Bringing the UK to the world and the world to the UK
- Delivering to the public the benefit of emerging communications technologies and services

5.1.2 To help deduce the current public value BBC Local Radio brings, RadioCentre undertook research to examine the output of several BBC stations, and their commercial equivalents, on an average weekday in November. Radiomonitor was commissioned to examine the music and speech output and the results of the study are included as Appendix 2 and informs the analysis below.

5.1.3 We have used this information to inform our overall view of BBC Local Radio performance against the public purposes, as well as an overview of our impression of the way in which the services deliver distinctive music and speech output.

5.1.4 **Fundamentally BBC Local Radio needs to echo the mantra of BBC Public Purposes.** If the above public service priorities are to have a meaningful impact on the quality and distinctiveness of BBC output, RadioCentre believes all six purposes should be prominent within BBC Local Radio content.

### 5.2 Sustaining citizenship and civil society

5.2.1 **The BBC sets the UK standard in journalistic content because it has access to one of the best newsgathering operations in the world.** BBC Local Radio stations typically have a relatively high proportion of speech content compared with the commercial sector, and employ more journalists to conduct primary newsgathering than their commercial counterparts. It is therefore BBC Radio services in the Nations and English Regions that have the greatest opportunity to enhance local news provision and bolster local democracy and community engagement.

5.2.2 RadioCentre welcomed the recognition within the 2010 BBC Strategy Review that the quality, originality and distinctiveness of English local radio could be improved, and supported the principle of a renewed emphasis on speech radio and journalistic content which holds local democracy to account<sup>17</sup>. 'With the rest of the local news sector at increasing risk of market failure, the BBC's contribution to local journalism is more important now than ever'<sup>18</sup>.

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<sup>17</sup> However, the proposals for English local radio raise the potential for a lessening of distinctiveness and localness outside of peak time, through the use of content sharing across stations.

<sup>18</sup> Caroline Thomson, 'Delivering Quality First - exploring ideas', 16 March 2011.

<http://www.bbc.co.uk/blogs/aboutthebbc/2011/03/delivering-quality-first---exp.shtml>

- 5.2.3 **Producing the best journalism in the world is consistently the number one editorial priority for BBC services.** It cannot do this without a range of journalists stretching from the widest significant international levels through to those reporting at the nearest locality. The strength of BBC journalism is in the variety of its approach and the connections between these approaches. BBC Management has acknowledged the intimate links BBC Local has with the wider news network when it outlined possible plans to merge BBC Local further with its rolling news service 5 Live<sup>19</sup>.
- 5.2.4 **BBC Local has a commitment first and foremost to news because of its crucial role in keeping local communities informed.** It is therefore appropriate that BBC Local is under the supervision of the BBC News department. Staffing information released to RadioCentre by the BBC reflects the importance of journalism for the service. We estimate that there are 847 journalists currently working in BBC Local Radio, which represents 61 per cent of the total work force.
- 5.2.5 **RadioCentre believes that the number of production staff currently at BBC Local brings an opportunity to further increase public value by increasing the amount of speech currently required by the BBC service licence.** As David Lloyd outlines in his attached analysis, an average of 22 full-time broadcast journalists per station is a more than sufficient amount of staff to undertake 85 per cent of the current broadcast schedule with a 60 per cent speech requirement currently.
- 5.2.6 RadioCentre research indicates that BBC Local stations are currently performing well within the boundaries of speech requirements set in the service licence. It would therefore seem appropriate to acknowledge this by **increasing the required speech content of Local Radio in the service licence and make it yet more distinctive from commercial services.**
- 5.2.7 BBC Local Radio output should reflect its superior journalistic resources. It is difficult to see how a discussion of Ant and Dec's new contract, texts read out about hot curries or an interview with Michael Ball regarding his latest record could not be considered the best journalism in the world, yet this *softer* news content appeared on each of the three BBC stations we surveyed in detail<sup>20</sup>. **RadioCentre is concerned that too high a proportion of BBC Local Radio is not serious local news content.**

**Recommendations:**

- The BBC Trust increases the speech requirement of BBC Local Radio to 75% of all week-day programming to reflect the current speech output of the service.
- A requirement should be inserted into the BBC Local service licence that the only stories and features covered are those from the surrounding TSA.
- There needs to be a reduction of 'soft' entertainment stories on BBC Local. The BBC does not need to feature this sort of news.

<sup>19</sup> John Plunkett, 'BBC may replace local radio with 5 Live broadcasts', *Guardian*, 10 March 2011. <http://www.guardian.co.uk/media/2011/mar/10/bbc-local-radio-5-live>

<sup>20</sup> See Appendix 2 for further detail.

### 5.3 Representing the UK, its nations, regions and communities

- 5.3.1 **Local radio has an important role to play in drawing communities together.** Consumers and citizens value the role local and regional content plays in their lives. Local and regional news in particular helps to inform people about what is going on in their local community; while news and other types of local content contribute towards reflecting UK cultural identity and representing diversity and alternative viewpoints<sup>21</sup>.
- 5.3.2 The BBC Local service licence stipulates that each BBC Local Radio Station should ‘broadcast at least 85 hours of original, locally made programming per week’<sup>22</sup>. Whilst RadioCentre does not believe the geographic location of content determines its localness, we are concerned that BBC Local content is not always as locally focused as it should be. **From RadioCentre research only 43.7 per cent of the speech content on the three stations covered local issues.** Localness was defined issues which had a direct impact on listeners in that community.
- 5.3.3 What was explicit in our analysis was that there was no content in core hours which focused on ethnic or religious minorities despite a service licence requirement that ‘Where they exist, local minority audiences should be catered for.’ We will examine this issue in more detail below (under ‘bringing the UK to the world and the world to the UK’).
- 5.3.4 **RadioCentre also believes it is important for local media plurality that the BBC plays a complementary role to commercial radio in supporting charity and community action.** Commercial radio is committed to its work in this area but can only achieve limited gain due to the resources available. We are therefore pleased to note as part of our analysis the charity promotion of Children in Need by BBC Local Radio. We encourage the BBC to take advantage of the resources available to it in order to further meet this public purpose to promote local – as well as national – good causes.

#### Recommendations:

- BBC Local stations should look to dedicate 10 per cent of their output per week to local social action campaigns and good causes.
- BBC Local should focus upon news stories which have relevance for the communities within that broadcast area.

### 5.4 Bringing the UK to the world and the world to the UK

- 5.4.1 Although BBC Local services should concentrate on the communities they broadcast to, their output should reflect the wider multi-national issues and influences of the globalised world we live in. However, it is not the responsibility of local radio to provide information on national and international matters unless the issue is specifically relevant to that local community.

<sup>21</sup> Ofcom, 2009. *Local and Regional Media in the UK*, p.3.

<http://stakeholders.ofcom.org.uk/binaries/research/tv-research/lrmuk.pdf>

<sup>22</sup> BBC Trust, 2011. *BBC Local Radio Service Licence*, p 5.

[http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory\\_framework/service\\_licences/radio/2011/english\\_local\\_radio\\_apr11.pdf](http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory_framework/service_licences/radio/2011/english_local_radio_apr11.pdf)

- 5.4.2 **An international news story only has relevance for BBC Local if it has a direct impact on the communities within that broadcast area.** It is therefore understandable that BBC London 94.9 reported extensively on the Arab uprising and gauged the opinions of a wide range of North Africans in London at the beginning of this year. It would be much more difficult to justify for a rural BBC station, without communities with family and friends in these countries, to give such an international issue the same coverage.
- 5.4.3 **RadioCentre recommends that as part of bringing the world to the UK, BBC Local Radio dedicates resources to supra-national issues which impact upon their communities.** Communities may be based on geographic location, but are also grouped by faith, language or by a shared interest. In this context there are currently several ethnic and religious communities that BBC Local Radio does not fully represent in its core broadcast schedule.
- 5.4.4 As a public service broadcaster, the BBC has an important role to play in enabling people of different faiths to understand one another. The BBC uses digital media to vastly increase output in almost all genres, but appears to leave religion at the margins. Half of pensioners still have strong religious beliefs, and whilst there are many quality Christian shows on the network, such as Sue Taylor's 'Sunday breakfast' with news from Lincolnshire's churches', RadioCentre feels that these shows are pushed to the outer reaches of the schedule. Other religions which make up more diverse communities are forgotten all together<sup>23</sup>.
- 5.4.5 BBC Merseyside is a standout urban local BBC station in terms of broadcasting effectively for ethnic audiences. 'Open House', 'Upfront' and 'Orient Express' are magazine programmes which cater for Asian, black and Chinese listeners respectively, but even these are in evening slots which may disappear under DQF proposals. Other urban areas, such as London or BBC WM, do have dedicated Asian or black programmes, but not to a prominence on the wider schedule which reflect the diversity of regional populations.
- 5.4.6 **RadioCentre believes that the BBC could more effectively and efficiently reach minority audiences by providing more clearly delineated slots on BBC Local Radio.** BBC Radio Leicester was the first BBC Service to run a show for ethnic minorities when it launched a weekly programme for Asian listeners in 1974<sup>24</sup>. Indeed, Leicester is estimated to become the first majority ethnic city in England next year<sup>25</sup>, yet the service schedule does not reflect this in its output during the week, with only a quarter of the weekend schedule is specifically aimed at an Asian audience<sup>26</sup>.
- 5.4.7 The lack of British Asian content on BBC Local Radio is now being magnified by the proposed changes occurring at Asian Network; where reductions in documentary and drama spend will potentially leave the BBC failing to meet their public value commitment to reflect and appeal to this large population<sup>27</sup>.

<sup>23</sup> Ben Summerskill, 'Elderly lose faith', *Guardian*, 3 September 2000.

<http://www.guardian.co.uk/uk/2000/sep/03/religion.world1>

<sup>24</sup> BBC, 2006. 'The history of BBC Radio Leicester'.

[http://www.bbc.co.uk/leicester/content/articles/2006/01/04/bbc\\_radio\\_leicester\\_history\\_feature.shtml](http://www.bbc.co.uk/leicester/content/articles/2006/01/04/bbc_radio_leicester_history_feature.shtml)

<sup>25</sup> Jeevan Panesar, 2005. 'A history of Leicester', *BBC Leicester*.

[http://www.bbc.co.uk/leicester/content/articles/2005/10/10/al\\_leicester\\_backgrounder\\_feature.shtml](http://www.bbc.co.uk/leicester/content/articles/2005/10/10/al_leicester_backgrounder_feature.shtml)

<sup>26</sup> BBC, *Radio Leicester schedule*. <http://www.bbc.co.uk/leicester/programmes/schedules>

<sup>27</sup> Admin, 'BBC Radio cuts content spend, slashes Asian Network spend 34%', *The TV Collective*, 6 October 2011. <http://www.thetvcollective.org/2011/10/06/bbc-radio-cuts-content-spend-slashes-asian-network-spend-34/>

**Recommendations:**

- BBC Local Radio should dedicate resources to supra-national issues which impact upon their communities as part of bringing the world to the UK.
- Religious and ethnic minorities should be catered for explicitly as part of core broadcast hours on BBC Local Radio.

**5.5 Stimulating creativity and cultural excellence**

- 5.5.1 Inspiring knowledge, music and culture were identified as significant areas of future focus as part of the BBC Strategy Review in 2010. Accordingly, BBC Local has the funding and a structure in place to experiment with new production ideas and ways of working in order to inspire its audience in new ways<sup>28</sup>. Such innovation should be distinctive and different from commercial services and complement the existing market where necessary.
- 5.5.2 **The inclusion of music on BBC Local in the weekday daytime schedule is often a dilution of distinctiveness.** Music play increases the degree of cross-over with the BBC's National stations and local commercial competitors alike. As David Lloyd highlights in the attached appendix to this response, 'the more music it [BBC Local] plays and the less local it becomes, the more similar it becomes to other radio services'<sup>29</sup>.
- 5.5.3 In an attempt to compete in a crowded local media market, some BBC Local Radio services have adopted centrally-controlled mainstream music policies. Whilst administration of play out records seems a sensible allocation of resources, a central music policy further dilutes the unique identity of each individual station. The inclusion of standardised music in the schedule inevitably alters the overall feel and personality of that station – potentially diminishing listeners' perceptions of their quality and distinctiveness.
- 5.5.4 As noted above, RadioCentre research of track play on 9 November showed that the overall music output of BBC stations was well within the 40 per cent parameters outlined by the BBC Local Radio service licence. Over the core hours of the day music play only equalled 19.5 per cent of content of BBC Local stations.
- 5.5.5 However, there are areas when music output appears to be more prolific in the schedule. In early and mid-afternoon (periods identified for proposed networking) stations tend to be more music focused. For example, between 12:00–14:00 on BBC Radio Cumbria Gordon Swindlehurst is advertised as 'The show that gets Cumbria talking about everything under the sun', yet on that day speech only took up an hour and ten minutes of the show; less than the prescribed 60 per cent.
- 5.5.6 **The major detrimental factor to distinctiveness in BBC Local Radio is the broad popular genre and age of the music.** Despite playing an impressive five *live* tracks over the day, 47 per cent of Radio Merseyside tracks came from the 70s and 80s; the majority of CityTalk

<sup>28</sup> BBC Trust, 2011. *BBC Local Radio Service Licence*, p 5.  
[http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory\\_framework/service\\_licences/radio/2011/english\\_local\\_radio\\_apr11.pdf](http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory_framework/service_licences/radio/2011/english_local_radio_apr11.pdf)

<sup>29</sup> Appendix 1, p. 6.

tracks (63 per cent) came from the same era. In the same day, both BBC Radio Lincolnshire and Lincs FM featured music from similar eras and identical tracks by JLS and Coldplay.

- 5.5.7 BBC London may have only played 23 tracks over the day, yet 5 of these were released in 2011, and seven of them were released later than 2005. This represents 30 per cent of current or recent chart hits in daily output, and is directly opposed to the service licence remit that 'current and recent chart hits should represent no more than 15% of weekly music output'<sup>30</sup>.
- 5.5.8 The BBC Local service licence states that a major part of BBC Radio should be 'original content'<sup>31</sup>. **The inclusion of recent mainstream pop and chart music in the schedule is therefore superfluous to the core remit of these services** because it duplicates content between the BBC and the commercial sector. If the service is to be truly distinctive, music on BBC Local Radio should preferably be tracks and artists that are not played on any commercial competitor so that the service maintains its identity.
- 5.5.9 RadioCentre is pleased that the BBC has decided to protect its 'BBC Introducing' as part of DQF, even if it may be as part of a networked unsigned show. It is important that local services continue to provide a platform for the promotion of emerging and established local music acts to reflect the vibrant music culture of that community.
- 5.5.10 **It is important that the music on BBC Local stations is of a specialist genre and not played anywhere else.** On BBC Radio Merseyside, shows such as 'Folkscene' have played an important part of the station's identity for decades. Crucially, this music is chosen by the station itself.
- 5.5.11 According to BBC research, music has never been the main draw for BBC Local listeners<sup>32</sup>. Ideally BBC Local stations would therefore remove popular music from daytimes and allow the stations to refocus their priorities on the speech content and local news which listeners value, whilst playing specialist music at other times.

#### **Recommendations:**

- BBC Local Radio should remove all popular music from daytime schedules.
- Emphasis on specialist music programmes promoting local and unsigned artists, currently broadcast during off-peak, should be increased.

## **5.6 Promoting education and learning**

- 5.6.1 The BBC has a responsibility, and the opportunity, to ensure that its portfolio of radio services broadcast content that informs, educates and entertains listeners of all ages. The BBC Local Radio service licence states that stations should contribute to educational and learning purposes amongst its audience by contributing to pan-BBC learning and social

<sup>30</sup> BBC Trust, 2011. *BBC Local Radio Service Licence*, p 5.

[http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory\\_framework/service\\_licences/radio/2011/english\\_local\\_radio\\_apr11.pdf](http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory_framework/service_licences/radio/2011/english_local_radio_apr11.pdf).

<sup>31</sup> Ibid.

<sup>32</sup> Sourced from: BBC, 1999. *BBC Local Radio – 2000: A review for a new era*, p. 11.

action campaigns.<sup>33</sup> Whilst RadioCentre agrees that such action is important, we believe the stations also have a responsibility to create their own educational content tailored to the specific audience as a means of maintaining standards of distinctiveness.

- 5.6.2 **BBC Local Radio needs to prioritise documentaries and other educational content.** From RadioCentre research, there is currently a distinct lack of educational shows in peak time programming. History programmes such as Carl Chinn's weekend programme on BBC WM are the exception rather than the rule. If networking is a serious option, BBC Management should also consider sharing quality and distinctive educational shows such as the 'Naked Scientists' on BBC Cambridge. Documentaries such as these are relatively timeless, and have relevance to a wide cross section of society. Education and learning should not solely be for younger audiences.
- 5.6.3 To support this work the BBC may also wish to explore opportunities to provide local community, hospital and student radio stations with access to the airwaves during off peak hours; thus retaining a localised focus whilst supporting and raising awareness of the wider local media sector. This would strengthen links with community, but also help educate the journalists and producers of the future.
- 5.6.4 Finally, **BBC Local has an important role in educating the journalists and producers of the future.** Local radio stations, like local newspapers, are often the training ground for new journalists who could end up working in national or international media. If BBC Local Radio has a public purpose to educate; it not only has a duty to act as an educator to the listener but also a duty to provide education to its staff as the talent of the future. Nurturing talent in this way is not only a more cost effective way of hiring staff that grow into roles, it also creates an opportunity to shape the organisation for the future, instil the public values of the BBC from the bottom up.

#### **Recommendations:**

- More investment needs to be made in explicit educational material at a local level, via documentaries.
- The BBC should undertake more local community action programmes at their local stations.
- BBC Local Radio staff resources should be focused on educating the journalists and producers of the future.

## **5.7 Delivering to the public the benefit of emerging communications technologies and services**

- 5.7.1 As outlined in its Strategy Review, the BBC has a responsibility to do all it can to ensure that radio secures its digital future. We were therefore pleased to note the BBC's recent announcement to build out DAB coverage for national stations from just over 90 per cent to 97 per cent of the UK population between now and 2015.

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<sup>33</sup> BBC Trust, 2011. *BBC Local Radio Service Licence*, p 5.  
[http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory\\_framework/service\\_licences/radio/2011/english\\_local\\_radio\\_apr11.pdf](http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory_framework/service_licences/radio/2011/english_local_radio_apr11.pdf)

- 5.7.2 **All BBC Radio services have a critical role to play in the digital radio switchover process.** Local radio now faces a challenging future. The sector requires digital certainty from the BBC. The current Government plan requires complete BBC backing and financial support.
- 5.7.3 Seven BBC Local stations are still not available on DAB as local multiplexes are not yet in place in these areas. RadioCentre recognises many of the on-going discussions regarding digital issues are at a corporate level and not the subject of service licence consultations. However, we believe that the BBC has a responsibility to promote digital radio and make its local service available on DAB wherever possible.
- 5.7.4 **There needs to be a specific requirement in the BBC Local Radio service licence for it to take a lead role in a digital radio switchover.** Currently Local service licence commits to 'deliver to the public the benefit of emerging communications technologies and services and, in addition, taking a leading role in the switchover to digital television.' The only commitment to digital radio is states that 'stations may also be made available on DAB digital radio and digital television platforms'<sup>34</sup>.
- 5.7.5 **To not promote DAB radio through local radio services is a wasted opportunity for the BBC.** More 55-64 year olds listen digitally than on average, and of the 33 stations currently on DAB, over a quarter listen digitally.<sup>35</sup> With a market demand of its core audience, it is therefore appropriate that BBC Local services should be made available on all digital multiplexes as and when they are constructed.
- 5.7.6 The BBC should be maintaining broadcast levels for licence-fee payers, but not at the expense of new technologies. It should therefore be ceasing the simulcast of BBC Local stations on the AM band where FM coverage is available.

**Recommendations:**

- The service licences of the BBC's Local services to be amended, to include specific targets for promoting listening on all digital platforms.
- BBC Local Radio should cease broadcasting on AM immediately in all areas where FM coverage is available.

<sup>34</sup> BBC Trust, 2011. *BBC Local Radio Service Licence*, p 1.

[http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory\\_framework/service\\_licences/radio/2011/english\\_local\\_radio\\_apr11.pdf](http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory_framework/service_licences/radio/2011/english_local_radio_apr11.pdf)

<sup>35</sup> Ofcom, 2011. *The Communications Market: Radio and Audio*, p. 160.

[http://stakeholders.ofcom.org.uk/binaries/research/cmr/cmr11/UK\\_Doc\\_Section\\_3.pdf](http://stakeholders.ofcom.org.uk/binaries/research/cmr/cmr11/UK_Doc_Section_3.pdf)

## **6. About RadioCentre**

- 6.1 RadioCentre is the industry body for UK commercial radio. It exists to maintain and build a strong and successful commercial radio industry, and to help promote the value and diversity of commercial radio.
- 6.2 Founded in 2006 after the merger of the Radio Advertising Bureau (RAB) and the Commercial Radio Companies Association (CRCA), RadioCentre represents radio groups and stations from rural, small scale ventures, to household names serving major metropolitan areas. Its member stations together represent 90 per cent of commercial radio listening.
- 6.3 Working with a range of stakeholders, RadioCentre works for the greater benefit of commercial radio, from lobbying on the industry's behalf with government, Ofcom and policy makers, to raising the profile of commercial radio with advertisers and their agencies, and of course, working with radio stations themselves, helping them maximise the potential of their businesses.

## **APPENDIX 1 - BBC Local Radio:**

### **Operational analysis and comment in the light of Delivering Quality First (DQF) proposals**

#### **About the Author**

David Lloyd has worked in radio for over thirty years.

Of particular relevance to this report, he was Group Programme Director of the regional Century network of commercial stations in the late 1990s, which held formats for the delivery of 40% speech. As Managing Director of the two LBC stations from 2005, he ran two London all-talk stations.

David had a year-long break from the commercial sector in 2008, initially as a freelance BBC Local Radio presenter and, very briefly, as a BBC Head of Local and Regional Programming, before his current position unexpectedly arose as Group Programme and Marketing Director at Orion Media which operates five Midlands commercial stations.

David launched Lincs FM, one of the most successful local-format stations; and spent a spell as a broadcast regulator in the mid-1990s, as Head of Programming and Advertising (Compliance) at the Radio Authority. He began his radio life hosting music and magazine programmes; and is a Sony Radio documentary Award winner.

#### **Introduction**

It is unarguable that radio comprising much speech of high quality will be more demanding in terms of staffing numbers than a format built upon the playing of recorded music. Skin-deep comparisons between a music-intensive commercial station and a BBC Local Radio operation are accordingly unhelpful.

The below seeks to throw light on how the licence commitments are currently delivered operationally by BBC Local stations; how that operation might be tightened to meet savings targets; and how a fresh alternate model might be assembled.

#### **The Service Licence**

The extant BBC Local Radio Service Licence demands:

*"...a primarily speech-based service of news, information and debate to urban and rural communities. Speech output should be complemented by music.*

*The target audience should be listeners aged 50 and over, who are not well-served elsewhere. There should be a strong emphasis on interactivity and audience involvement"*

*BBC Local Radio should deliver its remit by providing accurate, impartial and independent news and programmes that set local issues in context. The output should be relevant and act as a trusted guide to local and other issues for its audiences. BBC Local Radio stations should champion the local area and call to account decision makers. They should also reflect the diversity of communities served.*

*The presentation style and tone should encourage participation. Programmes should offer listeners the opportunity to contribute, and there should be opportunities for listeners to tell their own stories.*

*Output should be all speech at the breakfast peak and the service should be speech-led in daytime.”*

### **Operational Delivery**

BBC Local Radio began its life in 1967 within a reluctant BBC, and quickly grew a reputation through the '70s and '80s as a lively catalyst in local communities, often driven by big on-air characters, steeped in their localities. On some stations, such personalities still exist. Within its home in BBC News, the services have now evolved into ones driven by local 'original journalism'. These two elements working side-by-side now in the best stations are a powerful, successful and distinctive mix in many cities.

Across the UK, the BBC Local Radio licence is implemented, rightly, in differing ways. As is common with speech formats, each service appears very different to the listener. Although there are commonalities in: the scheduling and structure; the 'imaging' sound; and music content, each service is thoroughly distinctive for the vast majority of key listening periods.

Under its current licence, the stations must be 'speech-led at breakfast peak' (7-8.30), although some stations choose to roll that talk format through until 9.00.

Outside breakfast, the schedule comprises sequence programmes in which speech plays a large part, with the licence demanding speech-led programming (60% in 'core hours'). The hosts of programmes are commonly broadcast journalists (or senior broadcast journalists), and recruited as such. In some stations, 'personality presenters' are integrated into the mix.

Unlike in commercial music radio, the majority of programmes are all legitimately supported by production resource from broadcast journalists/senior broadcast journalists and broadcast assistants.

The all-speech breakfast programme will, logically, enjoy the most production resource; and this can extend to such staffing as: senior/broadcast journalist (producer); broadcast assistant (assistant producer); 'phone answerer' and, in some cases, a broadcast journalist covering outside broadcasts. After the show, staff will remain on duty preparing for the following day, relieved by another broadcast journalist later in the day to prepare material for the following morning. On air, these shows are rich and fast-moving; and take full advantage of the available resource.

In recent years, a renewed focus on the most listened to programmes has led to some stations boosting the mid-morning resource from a single broadcast journalist; and adding a greater depth of supervisory management. Similarly, the evening drive programme will also be well-resourced. Other, less intensive programmes enjoy a single person in the live production support role; and some off-peak programmes on some stations have no live production support.

Each programme will include substantial news, sport, weather and travel content provided by a significant newsroom and sports department; supplemented by weather presenters where required (often shared with the TV operation) and travel news (provided by an external contractor).

Management of the overall operation is the responsibility of senior broadcast journalists, assistant managing editors and the managing editor, overseen regionally by the relevant head of local and

regional programmes. These management individuals can also play executive roles in the operation and are all very much part of the editorial decision-making chain.

In some stations there are 'station sound' posts. Support staff can typically include such staff as: record librarians; clerical/administration; reception; and in some cases 'scheduling' posts, responsible for staff rotas and payroll administration.

### **Operational analysis**

**Halve the amount of heads of local and regional programming and other senior management posts.** The number of staff involved in the management chain, or in 'senior' posts, in some stations appears to me to be excessive. This should wisely be the first focus for any reductions in overheads; and such structural changes need cause no detriment to the quality of output. It may even free creativity. Given the relative salaries of these posts to the 'programme production/presentation' roles, such changes would also produce the greatest cost savings.

**There should be only one manager per broadcast team.** The team of broadcast journalists in the newsroom could be managed by a single senior broadcast journalist; and the 'presenters' (broadcast journalists) supervised directly by the managing editor. This could lead to the loss of some senior broadcast journalist posts; and the assistant managing editor. It is noteworthy that whilst some BBC stations appear to manage on four posts in the higher grades (8-11), others have more than double that figure.

I also believe, having held such a post, that there is little justification for such a rich tier of head of local and regional programmes (HLRP) posts, currently charged largely with managing the TV and radio stations within a TV region. These HRLP regions could be made significantly larger.

**BBC Local presenters should be freelancers to offer better scheduling agility.** Programmes are typically presented by broadcast journalists (or senior broadcast journalists). The key role of these individuals is to connect to their audiences and to have the gift of live, engaging communication; arguably a different skill-set from that required from a great journalist in the field or from a journalist who prepares and reads bulletins. As these 'presenters' are generally part of the 'broadcast journalist' team, they are on the staff payroll. Accordingly, when schedules are revised, there can be challenge of finding 'jobs' for those displaced. In the commercial sector (and elsewhere in the BBC), the majority of such individuals are legitimate freelancers. This creates more flexibility and reduced employment costs.

BBC Local Radio stations are significant business units. Although gifted at editorial judgement, one wonders whether all station managers feel as well equipped as they might in running business units of this scale. In the commercial radio sector, as in most businesses, uncertain revenues and periodic tough recessions are powerful lessons. There is a skill in devising programme and staffing schedules at the best possible cost. In my experience, the topic of best efficiency was rarely explored at senior management level. It must be new territory for many. I would suggest that the role of the remaining HRLPs should be to help manage the overall Local Radio business in the most efficient way; drawing on the many organisations in a new broader purview to identify operational synergy where appropriate.

Most importantly, very capable station managers appear to me to be frustrated in their efforts to achieve the best results at the best price. They feel they have insufficient power and influence to

make logical organisational and spending choices. This involves both the costs incurred on the ground, and those BBC central charges over which they currently have very little influence.

Whilst the window cleaner travelling almost a hundred miles to clean windows is a minor example; it is a powerful illustration, given one imagines the cost of that service overall must be more than it need be. Is group purchasing really delivering value on the ground to each BBC unit? Does the managing editor know the cost of: cleaning; facilities; travel news provision; training; complaints handling; HR support? Can they make choices?

**Station managers must be given more autonomy.** Managers with slim budgets, compared to their national and TV counterparts, are compelled to operate their units with the structures, systems and overheads of a much larger operation. Whereas scale should produce economies, my experience is that for BBC Local Radio, it generates the opposite. Many BBC Local Radio managers would be able to share more examples of this than can I; and would likely be relieved to have this as a focus.

Getting the most from staff is a key challenge. Whilst the number of posts is a clear immediate focus, it must be increasingly important to get full value from each post-holder. I believe there is clear scope for improvement.

My observation is that absence levels, both recorded and unrecorded, appear high. There must be an incremental cost to this.

There are also special extra payments to staff, including 'unpredictability allowances' and the like. Should there really be additional rewards on top of what are decent salaries?

There should rightly be concern regarding staff performance. It is said that 'no-one ever gets sacked from the BBC'; and even that belief is unhelpful. A perception exists that individuals who fall short are simply moved. There is little doubt in my mind that poor performance is tolerated, creating both inefficiencies and frustration from hard-working staff.

**Employment efficiency practices must be more in line with commercial industries.** In my time, I identified staff whom the operation could readily live without. Operational plans had changed, rendering posts genuinely redundant (as sometimes the post-holders might even quietly concede), but there appeared no senior management encouragement to dispense with all such posts. When circumstances do change, the initiative needs to be seized to adjust staffing levels commensurately and promptly.

**BBC Local should reduce the amount of secondments.** The BBC has a well-patronised system of attachments; whereby a person from one station will be seconded to another BBC area. Whilst there is merit in growing staff skills; I believe the disruption created by the frequency of change is now not in the interests of the overall operation; and the listener. When one person leaves their post, there is a period of briefing and adjustment for the replacement, for which there must be a resource cost. Similarly, at management level, no operation can be well-led by an individual who might, or might not, be replaced at some indeterminate time, dependent on whether another individual chooses to return to their post. A new, more efficient BBC Local Radio operation should wisely have many fewer attachments; and much more stringent rules on those placements.

**Resources are wasted on disproportionate compliance procedures.** Following the Ross/Brand incident, new compliance procedures were introduced across the BBC. At BBC Local Radio, they appear to me to be disproportionate to the risk; and interpreted differently station by station. Programmes presented by accomplished broadcasters are now routinely monitored ('complied'),

sometimes by people less experienced than the presenter. A significant wasted effort is the routine compliance of recorded programmes. Whereas these are, *de facto*, less risky than live radio, the compliance is most rigorous! A staff member is charged with listening to each minute of any pre-recorded show before broadcast.

**BBC Local stations should make it easier for listeners to complain directly to local station management.** The risk of serious impact of any compliance failures would be minimised at less expense by greater transparency. At present, a listener wishing to contact a managing editor will be easily thwarted. Similarly, the online complaint system does its best not to allow a complaint about BBC Local Radio! Is it not ironic that commercial stations are bound to publish who does what, and how to contact them, in their public files: local BBC stations are not? The more quickly one can speak personally to a concerned listener, the easier is it to tame an issue. Existing BBC complaints systems do not achieve this; and I question what fee BBC Local Radio pays to the outside complaints contractor to handle its material.

**Music scheduling and production functions should be centralised.** The music library on the network is chosen centrally, dependent on research. This material, however, is generally scheduled each day by each station. On some sites, there is a dedicated record librarian, on other sites there is not. Music may be of secondary importance to BBC Local Radio, but it is crucial to make sure that the musical complement to the speech, at the very least, is not wrong. It seems odd to me that this scheduling task, which could so easily be discharged centrally, is conducted locally. It is similarly puzzling that a broadcast journalist in their 20s with no music scheduling training can be asked to schedule a day of songs for the over 50s. There are some talented music programmers across the network, and the talents of these could wisely be shared across more sites, by use of the same music 'log', both saving resource and generating a better quality product.

Some BBC Local Radio stations employ members of staff dedicated to 'station sound'. Station 'imaging' is now largely originated centrally, and more could be done to enable this fully, as is common in commercial networks. In terms of pre-recorded programme 'promotions' (or 'trails' in the BBC parlance), stations could manage without many of these. In a speech format (and one where sponsor mentions do not need delivering or quantifying), the value of pre-recorded promotion is questionable. Is it not much more powerful to clip a great call or interview from one show and play it in another – or for an engaging presenter to tease a programme ahead with inventiveness and skill? If 'trails' also became a network responsibility, those gifted at producing the best could produce the few essential local campaigns/imaging, from local briefs as necessary. Whilst these 'station sound' role clearly lend value, and there are some excellent candidates in production roles, tough times call for tough choices.

**BBC Local Radio should not hire celebrities to front radio shows.** Some stations, principally in the metropolitan areas, recruit named 'talent'. In commercial radio, we are very familiar with the costs of recruiting and retaining such characters who legitimately command a higher market rate. I would question, however, the relevance of these appointments in pursuit of the BBC Local Radio licensed objectives. Where the incremental cost is not for the talents and contribution of an accomplished local broadcaster, but for a 'name', such investment surely sits ill with the BBC Local Radio ethos. If changes in this respect are what is meant by bringing BBC London 'more into line' with other BBC Local stations, then this DQF proposal is to be welcomed.

The BBC employs some staff in the regions as 'correspondents', working across both TV and radio. BBC Local Radio also gives opportunities to pitch for funding for special news projects, where resource is afforded to tackle specific topics. A strong case could be made that some gifted correspondents are doing very distinctive and valuable work; but it may be that some of the latter

'special' additional projects could be soaked up into the day to day duties of a sufficiently well-resourced newsroom. Either way, in any analysis, it should be acknowledged that these can form part of the existing local radio resource.

**To maximise available resource, BBC Local radio news should work more closely with online teams.** The BBC Online teams work adjacent to, yet not with, the radio teams. There is a clear synergy, as proven by most other commercial operators. It would seem foolhardy not to bring these online responsibilities into the radio team remit, with cost-savings.

**Better technology should free resource.** Some stations have occasional recorded shows: music shows, repeats or 'best of' programmes. With the existing 'Radioman' technology, these are generally assembled in real time. Commercial radio stations have mastered the art of 'voice-tracking'; and this facility would be useful for such programmes. Similarly, logging and scheduling music via Sable appears much more time intensive (and less intelligent) than other available technologies such as Selector and similar. Radioman does have advantages for this format, however, and any software would have to accommodate the demands of fast-changing live talk output.

During my short time at the BBC, I suggested that the local radio operations might arguably be hindered, not helped, by the BBC machine. If the umbilical cord were severed; and stations could simply buy services and support, as required, from the BBC, costs could be reduced significantly. The pride and energy within well-managed, more independent operations would bring its own rewards in heightened productivity.

### **The product and its audience**

Without a doubt, BBC Local Radio is currently a distinctive service. There is much output to be proud of; and many hard-working, gifted staff.

In recent years, for sound strategic reasons, much commercial radio has become less local. Programming has been shared with ever larger regions; and successful national brands have been created. This structural change has also occurred alongside a general trend over the years in much commercial radio away from 'full service' offerings, driven by 'localness', to a more targeted focus.

Commercial stations have also become ever more successful in pursuing commercially attractive audiences: those principally between 15-44 years of age. Economic conditions and the appetites of advertisers suggest that this will remain a key focus.

Such changes must create a genuine opportunity for BBC local stations to seize. Commercial radio stations have moved less local; and Radio Two has moved younger with its presenter choice. Here is a chance for BBC Local Radio to pursue its objectives with renewed vigour.

It is clear that BBC Local Radio has attracted a significant audience. Its reach is fairly consistent of late - currently 17% across all local stations (Rajar, Q3 2011, BBC Local), reaching 19% six months ago, where it also sat back in 2006. It is more successful in penetration away from the biggest cities; and it is accordingly easy for decision-makers in the biggest cities to under-estimate the love for BBC Local Radio which exists elsewhere around the UK.

Its loyalty remains high, with average 'time spent listening' of a very decent 9.5 hours per week. There is some evidence of downward trend on the average hours, with all figures sitting around above 10 this time in 2010, 2009, 2008 and 2007. This relatively high 'time spent listening', nevertheless, still suggests that many listeners do not find it easy to substitute their BBC Local Radio listening for similar alternatives. The more music it plays and the less local it becomes, the more similar it becomes to other radio services.

The BBC commissioned a report in 2008 amongst those aged 45+. I was fascinated to recall this research, given how closely it echoed the findings of a project conducted for the two LBC London talk stations (Sparkler 2008). The local information on both BBC Local stations and LBC stations is highly valued but must come with an emotional connection.

Both these reports suggest clearly to me that a regional or national programme on this format, with news squirted into localised 'windows', may not meet the audience needs. Has any further research been conducted since BBC 2010 on what the BBC Local Radio listener genuinely values about what is offered? I have seen no evidence that the plans for Local Radio are, in the words of the DQF consultation, 'supported by robust analysis of audience needs'.

In terms of music, BBC Local Radio has made a welcome recent shift to a policy better suited to the tastes and interests of its target. In the period before, the music had veered younger in a bid to attract a younger influx of listeners. In recent months, this has reverted to a more sensible and distinctive mix, as demonstrated by recent RadioCentre commissioned monitoring. As suggested above, however, the daytime music mix changes station by station, whereas research frequently confirms, English audience tastes generally do not.

A key headline finding from the BBC 2010 research was that local identity is important and that listeners are proud of their area. If programming is shared, the local identity can be seriously compromised for that period on a format such as this.

Listeners see BBC local stations favourably for: *local like me; helps me get the best from my area; supports my local team; being on my side; and sharing cultural references*. It is easy to see how the proposed changes would risk a serious diminution of each of those attributes. These values are driven heavily by more than just news.

Locally-originated programming also proved popular in attitudinal research commissioned by Orion Media last year. Although this research was in demographics younger than the BBC Local Radio target, there was clear evidence that the value of 'a local station' grows appreciably as one moves up the age scale. Similarly, the adverse response to 'local format' stations broadcasting programmes from national centres is also very significant in the older demographics.

### **The proposals for change**

The proposals for BBC Local Radio suggest the following:

- *Focus spend on peak-time programmes: breakfast, mid-morning and drivetime; sport; and faith on Sunday mornings*
- *Increase levels of sharing programming in off-peak slots: weekday afternoons, Sunday afternoons and evenings*

- *On weekday afternoons most stations would share programming with their neighbouring stations, although a few, which serve a particularly distinct audience, would remain separate*
- *On weekday evenings between 7pm and 10pm, programming would be shared across England, with all stations coming together except when providing local sports commentaries*
- *At other off-peak periods programme sharing would occur at a variety of levels. Some would be akin to the regional television areas, and during the late evening in five larger areas: the North; the West Midlands; the East Midlands; the East and South East; and the West and South West*
- *All stations would broadcast Radio 5 Live from 1am until the start of their breakfast programme*
- *A number of locally split breakfast programmes would end*
- *Within all shared programming individual stations would continue to provide local news bulletins at present, and would be able to leave the shared schedules in times of civil emergency or bad weather*
- *BBC London would lose a number of off-peak programmes and reduce other spend to bring the station more in line with other BBC Local Radio stations*

**The DQF proposals impact on BBC Local Radio's most distinctive programmes.** It is puzzling that the withdrawal of a daytime local show is a key plank in the savings strategy. Given this is already a less speech-intensive programme, the savings from this show alone are minor. Its absence, however would have a significant impact on the personality of the stations. Listeners to a network charged by the service licence with providing 'interactivity and audience involvement', would hear voices from other areas on stations they had called their own.

Mid evenings are times when audiences are lower, so one can understand a case being made for savings. It is, however, a time when the most distinctive output has been broadcast.

**Weekend local programming should be valued as much as weekday peak-time programming.** Similarly, weekends in the proposals look vulnerable to 'increased levels of sharing'. Audiences at those times are significant, and again it is a key opportunity for the most distinctive and most valued programmes. 'Sunday afternoon' changes could potentially affect the significant available audiences at lunchtimes; and during the evening commercial radio 'chart programme' slot, there is a clear case for an alternative. There is little doubt that a BBC Local Radio which ceases investment in these programmes is a significantly less distinctive service. Similarly, these are likely some of the most cost-efficient economic day parts to operate, given they are less journalism-driven. They are a time when the 50+ audience can be super-served.

The BBC Local Service Licence requires that 'Specialist music should be appropriate to the area...stations should take advantage of their structure – small teams and no formal commissioning structure - to act as a test bed for new production ideas and ways of working, and for developing new talent'. It is reassuring that 'BBC Introducing', delivered locally, appears poised to remain on the schedules. The same importance should be attached to other local specialist music and off-peak nostalgia programmes which appeal to BBC Local Radio's target audience. If off-peak and weekend programming is to be regionalised or nationalised, there are fewer opportunities for such programmes; and for the exposure of new talent.

In very recent times, some stations have even grown the number of off-peak news bulletins. Do listeners value an 11.00 pm local news bulletin more than, for example, a local specialist music or nostalgia programme? Although these programmes generate smaller audiences, they are amongst the BBC's most distinctive radio strands.

**Generic talk magazine shows exist elsewhere on the BBC Network and should not be on BBC Local Radio.** The service remit states 'a target audience should be listeners aged 50 and over, who are not well-served elsewhere'. A move away from locally trenchant chat to more generalist conversation on regionalised programmes would make the product ever more similar to, for example, the excellent Jeremy Vine show on BBC Radio 2. There are already some networked programmes on BBC Local Radio, and I would suggest that some of the shared 'early' shows (pre-breakfast) sound possibly the closest thing to the commercial radio offering than anything else on the station. Where shared programming does appear successful, thanks to the talents of the individual presenter, there is no evidence that it would be less so were it broadcast on only one station. Evidence suggests the contrary.

### Alternative approaches

As outlined above, I believe there are considerable savings to be extracted by the removal of management roles; and better efficiency.

It is useful to ask how a commercial operator, charged with delivering the format, might plan, given funding so to do. It goes without saying that it would pick cheaper premises; and choose to buy far less from 'head office'. It would seek to create a healthy, motivated environment, with a focus on delivering the best product with minimum bureaucracy. It would streamline the management structure, have freelance presenters, and create an agile environment overall.

Against that backdrop, it might establish a staffing arrangement as below (Annexe A). Presenters on shows of three hour duration (some working six shifts per week) would be supported by an appropriate number of producers applicable to the show content. Whilst all-speech 'news' breakfast do demand a rich tier of production along current lines, it should be possible to produce an excellent daytime 'magazine' programme using just the resources of the presenter alongside one producer, with input, when necessary, from the newsroom. This happens on some sites, and I have done it myself. In my experience, there were LBC programmes too, where a single producer and presenter were deemed sufficient for content generation for even an all-talk offering.

A compact newsroom would work closely alongside the programme producers to create the day's agenda for relevant programmes. Although an 'all speech' breakfast show is labour-intensive, it typically requires 4-6 pieces per hour; some of which logically follow on from items which the 'bulletin journalists' will be pursuing. Similarly, as now, live output would generate clips for bulletin material.

BBC Local Radio stations now have an average of 35 staff. Some stations, however, enjoy over 40 full time staff (Leeds at 46; Humberside at 42; London at 44; and Nottingham at 43). These numbers exclude freelance resource, where it exists; any extra 'funded' posts; and any periphery resource in the buildings. I believe the staffing level below would be equipped to deliver all the existing licence commitments, albeit in a slightly different way. This putative plan takes 25 posts.

At a total annual staffing cost of £66.2m for the BBC's local stations, the average staff cost for a BBC local radio station, including those directly involved in production, presentation and management is

£1.66m. I believe it could be effected, at a fresh start, for around £1.1m; a saving of around a third on staff costs. There is also scope, I believe, for further significant savings, as adumbrated above (facilities and BBC re-charges) from the remaining BBC Local Radio non-distribution costs.

It is easy to think that there is no alternative to 'the way things are done' when delivering quality speech. Again, I would point to examples from elsewhere: from the rich 'riots coverage' from a small brmb news team; to the armed forces recognition from the team at Jack FM Oxfordshire. From the incredibly successful LBC output overall; to the distinctive output at City Talk. From the rich community involvement at Lincs FM; to the powerful impact of Radio Scilly in its community. The latter is achieved by a single person operating the whole station.

### **Conclusion**

If the DQF proposals are implemented, they would deal a real blow to the character of BBC Local Radio. Taking away the companionship of local output and eating in to the rich array of off-peak programming would, in a single blow, preclude compliance with the extant licence.

The opening lines of the service licence require "*...a primarily speech-based service of news, information and debate to urban and rural communities*". The services are also required to have strong *'interactivity and audience involvement'*. Fewer local programmes cannot mean anything other than less audience involvement.

Importantly, the target audience: "listeners aged 50 and over" now have nowhere else to go, and this local companionable format is why they value the BBC so much. If one spoke to members of BBC staff about why BBC Local Radio exists, I suspect 'news' would rightly appear in their answer, as would 'local'. The words '50 plus' would be rarer. In taking BBC Local Radio forward, better account must be taken of the tastes and interests of the 50+ listeners. They do not seek a more general magazine programme from a City about which they care little; they want to chat with a friend who lives where they do. Local output; and listener engagement is as important as the local news bulletins. Any manager who took the time to chat openly with a dozen BBC Local Radio listeners would be told the same story.

There are alternatives to DQF, and I believe the areas I have floated would go some considerable way to realising necessary savings. Many of the moves would create better, not worse, output.

If, as is speculated, the local radio cuts need not cut quite so deeply, it would be thoroughly appropriate, nevertheless, to seize the opportunity to rationalise how BBC Local Radio operates. It could re-allocate spending to deliver an even more distinctive network for this growing demographic which is so poorly served elsewhere. More, not less, local programming could be delivered.

BBC Local Radio stations employ many talented individuals producing a distinctive offering. The service, however, simply costs much more to run than it should. I believe it is both over-managed and poorly managed; often not through little fault of individuals on site, but because of the overall current structure of the operation.

The vision of Frank Gillard, the 'father' of BBC Local Radio, was to establish *'modern radio-journalism geared to the interests of the local community'*. Most presciently, he suggested that *'managers would be free to provide the programmes which best met the needs of their communities'*. That strategy, enabled by the right individuals, together with conscientious observance of the letter and

spirit of the Licence would, at a stroke, produce a better and more distinctive BBC Local Radio at the right cost.

### **Annexe A** - Putative staffing plan

Management - Managing Editor, News Editor						2	
Admin - one admin manager plus one receptionist						2	
Admin						4	4 posts
<b>Weekdays</b>							
	<b>Presenter</b>	<b>Producer</b>	<b>Asst Prod</b>	<b>Pre - prod</b>	<b>Bulletins</b>		
<b>Breakfast</b>	A	A	A	A	5-12 A		
<b>Morning</b>	B	B			9 - 5 B		
<b>Lunch</b>	C	C			12 - 8 C		
<b>Afternoon</b>	D	D	B		Reporter D		
<b>Evening</b>	E				Reporter E		
<b>Late</b>	F	E			Sport F		
<b>FT Posts</b>	6	5	2	1	6		20 posts
<b>Saturdays</b>							
					<b>Saturdays</b>		
<b>Breakfast</b>	*	*			5 - 12 *		
<b>Morning</b>	*	*					
<b>Lunch</b>	C	*					
<b>Afternoon</b>	Covered by sports staff				Sport H		
<b>Evening</b>	E				*		
<b>Late</b>	*				*		
<b>FT Posts</b>					1		
<b>PT shifts</b>	3 shifts	1 shift			3 shifts		1 post & 7 shifts
<b>Sundays</b>							
					<b>Sundays</b>		
<b>Breakfast</b>	*	*		*	5 - 12 *		
<b>Morning</b>	*	*			10 - 5 *		
<b>Lunch</b>	*	*					
<b>Afternoon</b>	*						
<b>Evening</b>	*						
<b>Late</b>	*						
<b>PT shifts</b>	6 shifts	1 shift		1 shift	2 shifts		10 shifts
							<b>25 POSTS TOTAL</b>
							<b>17 SHIFTS</b>

The above shows a possible staffing plan for a speech-heavy local station. Letters signify full time (FT) posts on 5 or 6 shifts per week. Asterisks depict extra single shifts (PT) required.

## **APPENDIX 2: Evaluating the content of BBC Local Radio and commercial radio competitors**

### **Introduction**

The Delivering Quality First proposals have clouded the issue of the actual performance of BBC Local Radio. The debate has been dominated by savings and economic realities, and not the value the service brings to the licence-fee payer as part of the wider radio market.

In order to inform our assessment of performance RadioCentre commissioned Radiomonitor to analyse a snapshot of the output of BBC Local Radio Stations on a single weekday: 9 November 2011. The study looked at eight BBC Local stations in total. These eight stations were selected by RadioCentre in order to give a representative sample of the variety of BBC Local services. The stations – Cornwall, Cumbria, Guernsey, Leeds, Lincolnshire, London, Merseyside and BBC Radio Three Counties – represent a range of station size and broadcast location of BBC Local Radio in England.

Radiomonitor also provided a more detailed analysis examining the music and speech output of a subset of these stations (BBC London 94.9, BBC Radio Merseyside and BBC Radio Lincolnshire), which were chosen in order to sample the variety of offerings BBC Local stations have in the most urban and rural areas in the North, South and Midlands.

In order to understand the distinctiveness of these services locally, we also asked Radiomonitor to look at the closest commercial radio alternatives to these stations – namely LBC 97.3 in London, Liverpool's CityTalk 105.9FM and Lincolnshire station Lincs FM. These stations represent a cross-section of commercial offering, including a complete speech station; a service which is majority speech with some music; and a locally-oriented music and information station. The broad comparisons of these stations are outlined as case studies below.

### **9 November 2011**

November 9<sup>th</sup> was chosen as it was unlikely to be skewed by a particularly significant news story, which may have otherwise distorted the data.

Stories reported by all stations were a student march planned in London, Frankie Cocozza had been kicked-out of the X-Factor TV show the day before and Fifa were refusing to allow England to stitch a poppy emblem onto their shirts for the upcoming Remembrance Day game.

In Lincolnshire, a Red Arrows pilot had suffered a fatal accident on the previous day, and in Leeds Jimmy Savile's funeral was taking place.

### **Speech**

On average the core hours of all eight BBC stations monitored on that day consisted of 80.5 per cent speech. This was well in line with service licence conditions that 60 per cent of output should be speech in core times. All stations also filled the prescribed one and half hours of 'breakfast peak' (0700-0830hrs, Monday-Friday) entirely with speech. In other day parts, such as the mid-morning and mid-afternoon when listening is lowest, music played a larger part of the schedule.

The type of speech varied at different times of the day. BBC London 94.9 opened the day with extensive debate surrounding that day's student marches to fuel discussion, whilst BBC Radio Lincolnshire had much comment in breakfast regarding the tragic Red Arrows accident the day

before. Conversely Lincolnshire also ran a music phone-in at 3pm before discussing Gok Wan's hairdresser, whilst at 12.30 BBC London 94.9 spoke to a caller querying why she could smell of toast on her train journey to work.

Once adverts and music were removed, the three commercial stations surveyed broadcast an average of 62.5 per cent speech content. Both Lincs FM and CityTalk featured more speech content in the morning than evening, whilst LBC not playing music meant that consistently 90 per cent of every hour was editorial and therefore speech content.

The more nuanced speech analysis undertaken by Radiomonitor broadly examined the localness and nature of speech on the six BBC and commercial stations. We acknowledge that much of this analysis is of a subjective nature, and therefore the same speech analyst was used for every station.

A *local* issue was one we defined as content from the TSA locality with local subject matter at its core. This could therefore be interviews with local people/personalities, off-site broadcast within the broadcast area or in studio debates and phone-ins about the area the station broadcasts to.

Content which was not deemed of local relevance were issues not specific to that broadcast region and could be covered on any national radio station; such as any entertainment discussion of TV, film and music; or interviews with personalities with no local connections. It was also felt that whilst service self-promotion is standard practice in radio, cross promotion was unnecessary on BBC Local Radio. A distinction was therefore made between raising awareness of individual programmes being *editorial* and the advertising of specific services or events not part of that station's schedule were categorised as *promotion*.

	Percentage of speech				
	Presentation	Local content	Non-local content	Promotion	Other
BBC London 94.9	14.0%	42.5%	38.2%	5.1%	0.2%
BBC Radio Lincolnshire	9.9%	42.4%	42.0%	4.3%	1.4%
BBC Radio Merseyside	15.1%	39.8%	38.7%	2.9%	3.5%
<b>Average:</b>	<b>13.0%</b>	<b>41.6%</b>	<b>39.6%</b>	<b>4.1%</b>	<b>1.7%</b>
LBC 97.3	4.3%	49.3%	43.5%	1.5%	1.4%
Lincs FM	40.0%	8.9%	17.9%	10.7%	22.5%
CityTalk 105.9FM	7.4%	23.4%	60.6%	5.1%	3.5%
<b>Average:</b>	<b>17.2%</b>	<b>27.2%</b>	<b>40.7%</b>	<b>5.8%</b>	<b>9.1%</b>

For the purposes of the above analysis, 'other content' is broadcast material which had no direct comparison between the stations. For example, all commercial stations that day ran competitions, which is not part of BBC Local Radio remit.

Despite the BBC stations being drawn from different geographical and population areas, with varying budgets, speech output using these categories remained roughly similar. Therefore news and information speech *content* such as debate, discussion, reports and phone-ins made-up approximately 80 per cent of speech, and this was evenly split between local and non-local issues.

The speech output of commercial stations highlighted the diverse range of stations selected. LBC, with a 100 per cent speech remit, was by far the closest to BBC stations in terms of types of content. Music station Lincs FM, featured a majority of presentation speech due to the nature of the station's

core output and the introduction or back announcing of records; whilst CityTalk, having a service licence with both music and speech requirements, was somewhere between the two.

## Music

The music analysis undertaken by Radiomonitor grouped the tracks played in terms of genre and period. Despite the BBC Local service licence stating that 'current and recent chart hits should represent no more than 15% of weekly music output'<sup>36</sup>, no definition for these periods is available from the BBC. For the purpose of our case studies (below), 'recent' music was therefore defined as tracks released after 1995 and 'current' music that released after 2005. 'New' music was categorised as tracks unreleased or only released in the month before broadcast.

Of the 8 BBC Local stations RadioCentre examined, 2 hours and 36 minutes of music was played on average between 0600-1900 on 9 November; which equates to an average of 48 tracks or approximately 19.5 per cent of broadcast time. This ranged from the 70 songs played by BBC Radio Lincolnshire, to the 23 played on BBC London. The BBC Local Radio service licence states that in core hours music should make up no more than 40 per cent of the output, and therefore the stations were well within these requirements.

The frequency of tracks played by BBC Local stations varied throughout the day. Partly this can be explained by the BBC Local Radio service licence commitment to being 100 per cent speech in breakfast and only needing to be 60 per cent speech aggregated over a week, but at certain periods the music play sometimes was more than 50 per cent of the output. This is usually the case in particular blocks of 3 or 4 hours during daytime when these 'speech-led' BBC Local services are playing almost as much music as their commercial competitors.

BBC Local Radio – Track plays by day part – 9 November 2011				
Day part	BBC Station	Tracks	CR Station	Tracks
9am-1pm	BBC Radio Leeds	25	Real Radio Yorks	44
12pm-4pm	BBC Three Counties Radio	19	Heart Home Counties	49
1pm-5pm	BBC Radio Guernsey	31	Island FM	36
2pm-5pm	BBC Radio Lincolnshire	26	Lincs FM	31
12pm-4pm	BBC Radio Cumbria	29	CFM	49
3pm-7pm	BBC Radio Cornwall	28	Atlantic FM	50
2pm-5pm	BBC Radio Merseyside	23	City Talk	12

Admittedly these are selective samples on a single day. However, these periods of more intensive music usage during daytime could dilute the distinctiveness of services during these periods.

In addition, the music played by BBC stations on the day of our survey covered a variety of decades, and can mainly be classified as 'pop'. In addition, 50 per cent of all music played on the BBC stations was from after 1980; and 38 per cent of it was from after 1990. This is in line with the service requirement that 'music output should be mainstream in peak-time', but there was a degree of genre and era overlap between the music being played on both Lincs FM and CityTalk and their respective BBC Local stations.

<sup>36</sup> BBC Trust, 2011. BBC Local Radio Service Licence, p. 5.

[http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory\\_framework/service\\_licences/radio/2011/english\\_local\\_radio\\_apr11.pdf](http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory_framework/service_licences/radio/2011/english_local_radio_apr11.pdf)

Support for other music genres in daytimes was limited, with more than half (52 per cent) of tracks categorised as pop or rock. Only a small number of tracks were from specialist genres – including folk (2.8 per cent), jazz (3.5 per cent), and country (5.6 per cent).

## **Case study A: BBC London 94.9 and LBC**

### **Overview**

BBC London 94.9 has an average weekly reach of 474,000 listeners.<sup>37</sup> Despite being down 15.4 per cent on the same period in 2010, it is still nearly double all other BBC Local stations (which would be expected given it has a TSA of three times more than any other BBC Local Radio station). It also has a lower target age than any other of its comparative stations, focusing on those 45 and older.<sup>38</sup>

To deliver for this large and diverse target audience the station also has the largest financial backing in local radio, and one of the highest BBC Local staff complements of over 44 FTE positions. Accordingly, it is proposed in DQF that BBC London 94.9 cuts its budget by more than any other station. It faces a proposed reduction of £1m per annum, equalling more than 20 posts.<sup>39</sup>

The extra resources combined with a greater catchment area allows BBC London the capability to broadcast a wide variety of speech content, but it is not committed to produce as much speech content as its chief commercial competitor, LBC 97.3. Alongside the usual regulatory obligations that commercial radio stations are subject to, it is licenced to provide 'a 24-hour speech service of news, views, discussions, phone-ins and entertainment for Londoners (with any music for illustrative purposes only)'<sup>40</sup> by Ofcom. Currently 841,000 listen to the station each week.

### **Analysis**

BBC London performed better than any other station in our analysis in terms of diversity and amount of speech content. 90.5 per cent of the content was speech, with only 23 tracks played over 13 hours of broadcast. This was a slightly higher editorial speech percentage than LBC, due to the necessity of the commercial station to broadcast advertisements.

Of the 23 music tracks played over the day on BBC London seven were released later than 2008 and are categorised as 'current' for the purpose of this analysis. Five of these current tracks were released in 2011; one being rap artist Maverick Sabre, currently played on Radio 1.

Whereas BBC London editorial focused more on presenter lead debates in the studio, LBC content used phone-ins as the basis for discussions. 57.4 per cent of LBC speech was debate. BBC London preferred presenter led features. This consisted of 35 per cent of content.

LBC featured more local content over the day. Of the editorial speech in the studio 49.4 per cent of LBC content referred to issues specific to London. BBC London only featured 44.4 per cent local editorial in comparison. Similarly LBC featured 282 explicit news stories over the day, 102 featuring issues concerning London. BBC London featured 105 local stories, only three more.

The localness pattern is interesting for both stations. With London being the centre of a mass protest on the day of the analysis, this would have been a catalyst for significant local report and debate. Looking at the two stations in detail, BBC London dedicated some of the extra time LBC devoted to local debate to promoting broader BBC initiatives and events instead, such as the Children in Need 'Rock of Ages' event.

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<sup>37</sup> RAJAR, Q3 2011.

<sup>38</sup> BBC Trust, *Service Licence*, p. 28.

<sup>39</sup> Simon Rogers, 'BBC local radio cuts: interactive graphic' *Guardian*, 11 December 2011

<http://www.guardian.co.uk/media/2011/oct/14/local-radio-england-bbc-cuts>

<sup>40</sup> Ofcom, 2011. *LBC 97.3 licence* <http://www.ofcom.org.uk/static/radiolicensing/amfm/al008-2.htm>

## **Case study B: BBC Radio Lincolnshire and Lincs FM**

### **Overview**

BBC Radio Lincolnshire has a weekly reach of 96,000; one of the smallest Local Radio stations in terms of listeners. It has a higher than average 39 FTE positions, seven of which may be made redundant as part of the proposed 18 per cent cuts as part of DQF. This reduction is a figure lower than the average cuts proposed for Local Radio stations.<sup>41</sup>

The service licence for BBC Radio Lincolnshire states it must 'meet the needs of listeners in the city of Lincoln, together with those in the smaller towns and rural areas it covers.' Due to transmission issues in North Lincolnshire, parts of the county are covered by BBC Radio Humberside; and this relationship is extended to the station sharing broadcasting content from Humberside between 0500-0600, 1200-1400 and 1900-2200 daily.

Lincs FM is the founding station of the Lincs FM Group of independent stations. The licence originally awarded to the station in 1991 states that it is 'a locally-oriented music and information station for Lincoln and the surrounding area', with hourly news during peak-time weekdays. It currently has 324,000 listeners each week, and 19.8 per cent share of TSA.<sup>42</sup>

### **Analysis**

With 73.2 per cent of content being speech, BBC Radio Lincolnshire broadcasted the least speech content of the three BBC stations in our study. In a market where there is no commercial speech alternative, we would expect BBC Lincolnshire to be more speech based than other stations, not less.

Like other BBC stations, features made up the majority of BBC Lincolnshire content. More features looked at non-local content (25.8 per cent of total speech) in comparison to local issues (22.9 per cent). The funeral of Sir Jimmy Savile in Leeds, for example, was covered at length by the studio team and in outside broadcasts on several occasions throughout the day.

At certain day parts, music took a larger role in the BBC Radio Lincolnshire schedule. Music play equalled less than 27 per cent of total output, but between 1400 and 1500 14 songs were played, totalling 63 per cent of output. This was actually four more tracks than Lincs FM played at this time.

Of the total 70 songs played on 9 November by BBC Radio Lincolnshire, 51 per cent were from the 1960s and 70s. Nearly a quarter of these (17) were 'recent' tracks, and included artists such as James Morrison, The Scissor Sisters and JLS; all of which would be expected to be found on Lincs FM. Indeed, the latter artists were played on Lincs that same day.

Both stations featured a higher percentage of entertainment news than any other stations examined. Paper reviews and chats about *Strictly Come Dancing* made up only 3.3 per cent of total BBC Lincolnshire speech output, but at over 15 minutes of the day the BBC station still broadcast more entertainment news than Lincs FM. This was despite the commercial station featuring a showbiz news segment at regular intervals in morning and drivetime shows.

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<sup>41</sup> Simon Rogers, 'BBC local radio cuts: interactive graphic' *Guardian*, 11 December 2011  
<http://www.guardian.co.uk/media/2011/oct/14/local-radio-england-bbc-cuts>

<sup>42</sup> RAJAR, Q3 2011.

## **Case study C: BBC Radio Merseyside and CityTalk 105.9FM**

### **Overview**

BBC Radio Merseyside has received the most significant amount of press coverage during the DQF consultation process because of the lobbying of local MPs and station staff. Merseyside is the most listened to of the BBC's 39 local radio stations outside of London with 348,000 listeners.

Radio Merseyside presenter Roger Phillips challenged Mark Thompson directly at the Radio Festival in Salford. He said reducing the budget by £420,000 in five years would mean the station losing 15 of its 46 staff, with the effect that "we can't provide quality at all".<sup>43</sup> Similarly Luciana Berger, the Labour & Co-operative MP for Liverpool Wavertree, has spoken in several Parliamentary debates in protest the cuts; and collected 1,500 signatures on her website to keep the service untouched.

The station has a service licence remit to be distinctive in its market as a speech-led service.<sup>44</sup> Indeed, it has a history of providing unique content such as the recently cancelled soap, 'The Merseysiders'; but is now more notable for its varied off-peak music shows such as 'Folkscene'.

The closest commercial equivalent to BBC Radio Merseyside is Bauer station CityTalk 105.9FM. It broadcasts 100 per cent speech during peak times; focusing on news, information, features and discussion, and operates a news-and-music mix throughout the core hours of the day. This means that during weekday daytime speech content will generally not fall below 50 per cent. 67,000 currently listen to the station each week.<sup>45</sup>

### **Analysis**

On 9 November Radio Merseyside featured only 21.1 per cent music. Whilst this was within service licence remits, it is worth noting that only 15.5 per cent of CityTalk content was music.

CityTalk notably featured a disproportionately high amount of non-local content (60.6 per cent) in comparison to the other stations surveyed on 9 November 2011. These are issues which will have been appropriated from national sources such as newspapers and given a local perspective. This is to be expected by a local commercial station which does not have an extensive news gathering resource.

BBC Merseyside undertook many similar news reporting methods to its commercial equivalent that day. During 0700-0800 there was over five minutes of output regarding the national papers. In total there was 1 hour and 52 minutes of non-local debate over the day on BBC Merseyside. 32 minutes of this non-local output occurred between 1400-1500, the other 28 minutes that hour was music.<sup>46</sup>

BBC Merseyside has a notable off-peak music policy, but its play-out during core hours does not appear entirely distinctive. The 51 tracks featured during the day monitored consisted of 0 released before 1960. 47 per cent were released in the 1970s and 80s. CityTalk played less music in total on 9 November 2011, but the largest majority of music they did play came from the same two decades (63 per cent released in 1970s and 80s).

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<sup>43</sup> Torin Douglas, 'Will BBC cuts harm local radio?' *BBC Online*, 2 November 2011

<http://www.bbc.co.uk/news/entertainment-arts-15551672>

<sup>44</sup> BBC Trust, *Service licence*, p. 30.

<sup>45</sup> Ofcom, 2011. *CityTalk licence* <http://www.ofcom.org.uk/static/radiolicensing/amfm/al008-2.htm>

<sup>46</sup> The tag line of the Billy Butler afternoon show is "Entertaining you through the afternoon with great music."  
<http://www.bbc.co.uk/merseyside/programmes/schedules>