

*Championing
excellence and diversity
in broadcasting*



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VLV RESPONSE BBC PUBLIC INTEREST CONSULTATION: NEW MUSIC RADIO STATIONS

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INFORMATION ABOUT THE VLV

The Voice of the Listener & Viewer (VLV) is an independent, not for profit membership-based charity, free from political and sectarian affiliations. VLV supports high quality broadcasting which maintains the democratic and cultural traditions of the UK. We support the independence and integrity of the BBC and encourage work which demonstrates commitment to the principles of Public Service Broadcasting (PSB). VLV is a charitable company limited by guarantee (registered in England and Wales No 4407712 - Charity No 1152136).

INTRODUCTION

VLV works to represent citizens' interests in broadcasting. In making this submission it is primarily concerned with the impact which the proposed changes will have on listeners and what is in citizens' best interests. We welcome this opportunity to comment on the public value of the proposals being put forward by the BBC to launch new music radio stations on DAB+.

VLV understands that the proposals are to launch the following stations:

- Radio 1 Dance aimed at 15-34 year olds which will be based on the existing BBC Sounds stream but also include new commissions, support the development of new UK artists, and reflect the dance scene.
- A Radio 1 extension aimed at 15-34 year olds which will provide a 'deep dive' into iconic tracks and artists from the last two decades.
- A Radio 2 extension aimed at the 55+ age group and audiences from C2DE groups with music from the 1950's, 60's and 70's.
- A Radio 3 extension aimed at audiences aged 35+ providing classical music to relax to.

It is VLV's view that in order to allay the concerns of the BBC's competitors, the BBC must put in place firm commitments to ensure that these new services provide material which is distinctive in comparison with commercial radio.

VLV notes that the number of quotas in the new 2023 BBC Operating Licence has been reduced so that quotas for radio now only focus on news, current affairs and original programming. VLV would like to see the commitments in the consultation document included in the BBC Annual Plan so that their delivery can be tracked in the BBC's new annual Performance Report to ensure that these extension stations are genuinely distinctive.

VLV notes the research cited in the consultation document which shows that the BBC's reach among 15-34's and C2DE audiences is less than that of commercial radio¹. We also note that Ofcom has 'consistently raised concerns with regard to the BBC's performance with audiences from lower socio-economic groups and younger audiences'².

VLV welcomes the BBC's approach which will go 'beyond algorithmically generated playlists by offering authentic human curation'³. VLV considers it is important that the BBC plays a leading role in curating content and not relying on models based primarily on algorithms.

¹ *New music radio stations: Public Interest Test consultation*, BBC, February 14 2024, paragraph 2.4

² *New music radio stations: Public Interest Test consultation*, BBC, February 14 2024, paragraph 3.1.1

³ *New music radio stations: Public Interest Test consultation*, BBC, February 14 2024, paragraph 3.3

Questions

Question 1: What do you think about the potential public value of our proposals for the launch of new music radio stations on DAB+, including the extent to which our proposal contributes to the BBC's mission to serve all audience through the provision of high quality and distinctive output and services which informs, educates and entertains?

VLV believes that as long as these new stations are genuinely distinctive in their approach and are not imitative of existing services, so that they are **additional** to what is already provided by the market, these proposals will provide individual, societal and industry value. We base our conclusion partly on the fact that the proposals are cost-effective at a time when BBC finances are stretched. Under these circumstances VLV would normally be advising the BBC to not consider expanding its services because it cannot afford to do so, however, because these plans make use of existing material and resources in an extremely cost-effective way, we welcome them.

If the ambitions set out in the proposals are achieved, VLV believes they will provide public value because they should increase the breadth and range of music available to audiences; they should also provide the BBC with greater opportunity to better support new music, emerging talent and British musicians as well as provide more live or specially recorded music for listeners.

VLV welcomes that these plans aim to address the deficit in provision for existing underserved audiences: those who are younger and those in C2DE demographic groups.

VLV's only concern about the proposals, in public value terms, is that they will require citizens to own a DAB+ enabled radio. This will involve listeners who do not have a DAB+ set to either listen online or invest in new equipment, which many may not be able to afford.

Question 2: What do you think about the benefit to audiences who will listen to the stations, as well as wider potential social and cultural impacts?

VLV considers that if the detailed proposals set out in the consultation document are fully delivered, these new services will be distinctive enough to justify them going ahead.

The potential benefits to audiences include the following:

- **Curated content:** VLV welcomes the BBC's approach which will go 'beyond algorithmically generated playlists by offering authentic human curation' on the new Radio 1 extension⁴. VLV considers it is important that the BBC plays a leading role in curating content and not relying on commercially successful models often based primarily on algorithms. We believe this will not only make the stations more distinctive it will provide an alternative approach with additional benefits for listeners.
- **Themed/more niche content for specific audiences:** VLV considers that the provision of additional more targeted, themed content which targets specific sectors or needs of the audience is an appropriate development considering the change in audience habits partly due to online streaming platforms⁵.

⁴ *New music radio stations: Public Interest Test consultation*, BBC, February 14 2024, paragraph 3.3

⁵ *New music radio stations: Public Interest Test consultation*, BBC, February 14 2024, paragraph 3.1.2

- **Greater choice for audiences:** VLV supports these proposals on the basis that the new stations are complimentary to existing BBC stations; this approach should ensure that the range of choice for audiences is increased.
- **Broader range of music:** Listeners should have access to a broader range of music than is currently available on BBC radio stations and commercial competitors.⁶
- **Greater support for emerging talent and UK Music:** British artists and emerging talent should receive more airtime than is available currently and this will be beneficial not only for UK musicians but also for audiences⁷.
- **Greater support for new commissions and new music:** These proposals should provide additional airtime for new commissions and new music which has little airplay currently with the Radio 1 Dance and Radio 3 extensions, as well as providing live and specially recorded music on Radio 1 Dance and Radio 3 extension⁸.
- **Greater plurality of classical music stations:** VLV considers that these proposals will provide greater plurality in the supply of classical music in the UK.

Question 3: What impact (positive or negative) do you think our proposal for new music radio stations on DAB+ might have on fair and effective competition on commercial radio stations providing music content on radio?

VLV notes comments made by RadioCentre in response to the publication of the proposals, which highlight commercial radio stations' concerns that these proposals are imitative, build on the success of commercial radio in these areas and fail to provide 'distinct public value'. VLV notes that their statement says, '[The BBC is] required to provide services that are truly additional, distinct and incremental to what is already provided by commercial operators, not duplicate it'.

VLV understands why the BBC's competitors might be concerned because they are already running stations which provide some of the features of these new proposed BBC stations. We therefore consider it essential that the BBC should be held to account by Ofcom to deliver the distinctive aspects of these new services, as set out in the Public Interest Test consultation document. If the BBC does not successfully provide genuinely distinctive services, VLV considers that Ofcom should step in to ensure the new stations are distinctive and **additional** to existing services.

Question 4: Are there any steps you think we could take to minimise any potential negative effects on fair and effective competition or to promote potential positive impacts?

As stated above, VLV considers that if the detailed proposals set out in the Public Interest Test consultation document are fully delivered, these new services will be distinctive enough to justify Ofcom permitting them to go ahead.

⁶ *New music radio stations: Public Interest Test consultation*, BBC, February 14 2024, paragraph 4.3.2-4.3.6

⁷ *New music radio stations: Public Interest Test consultation*, BBC, February 14 2024, paragraph 4.3.2 and 4.3.4

⁸ *New music radio stations: Public Interest Test consultation*, BBC, February 14 2024, paragraph 4.3.5

In order to minimise the potential negative effects on fair and effective competition, VLV would like the following commitments to be explicit in the BBC Annual Plan and reported on in the BBC's new annual Performance Report:

1) **A wider range of music than comparable commercial stations:**

- Radio 1 Dance – over 3,000 unique tracks per year
- Radio 1 New extension – 4,000 unique tracks per year
- Radio 2 extension – 5,000 unique tracks per year
- Radio 3 extension – 8,000 unique tracks per year

2) **Increased airtime for new music:**

- Radio 1 Dance – new music will comprise at least a third of tracks
- Radio 3 extension – at least 15% will be new recordings

3) **More British music than comparable stations:**

- Radio 1 Dance – at least 45%
- Radio 1 New extension – at least 33%
- Radio 2 extension – at least 40%
- Radio 3 extension – a broad range of tracks from a variety of British composers

4) **Live music⁹:**

VLV considers that specific targets (the number of live events or hours of live events) should be included in the BBC's plans for the new stations as follows:

- Radio 1 Dance – will provide live events 'featuring new DJs and acts emerging in the genre'
- Radio 1 new extension – showcase live performances
- Radio 3 extension – every week, the station will broadcast live and specially recorded music, from the BBC Orchestras and Choirs, the BBC's New Generation Artists, and other performers.

⁹ *New music radio stations: Public Interest Test consultation*, BBC, February 14 2024, paragraph 4.3.5