



**BETTER MEDIA**

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**Better Media**

<https://bettermedia.uk/>

Ian Murray MP  
Minister of State (Creative Industries, Media and Arts)  
Department for Culture, Media and Sport  
100 Parliament Street  
London SW1A 2BQ

**Subject: Radio Review Representation, Growth, And A Civic Partnership Mechanism**

Dear Minister,

*The current design of the Radio Review contains a structural omission: the absence of representation from civic and community media organisations, and from partners whose primary remit is social gain, local accountability, and public participation.*

Better Media welcomes the Review of Radio that you have launched, and your decision to undertake a strategic review of the potential of radio beyond the next decade. We recognise the opportunity it creates to stabilise the sector, support innovation, and secure long-term public value into the 2030s and beyond.

However, a central weakness in the current design of the Review is the absence of representation from civic and community media organisations, and from partners whose primary remit is social gain, local accountability, and public participation. This is offered in a constructive spirit and is not intended to seek preferential treatment. It is, however, a request to correct a structural omission that risks narrowing the evidence base, weakening legitimacy, and producing recommendations that are harder to implement in the real operating conditions of local and place-based broadcasting.

Radio policy is not only about consumer choice and market efficiency. It is also about civic infrastructure:

- The conditions under which citizens can access trusted, locally accountable information.
- Participate in shared public conversation.
- Experience a sense of belonging in place.

If the Review is to deliver outcomes related to trust, resilience, and social cohesion, it must include organisations that are explicitly structured to deliver those outcomes and that understand, in operational detail, the barriers that currently restrict entry and sustainability.

A second concern is contestability. Supply diversity is both a public-interest requirement and also a growth requirement. When ownership, distribution access, and sales capacity become concentrated, economic activity is narrowed. Local advertising markets and local trading relationships weaken, commissioning routes contract, and skills pathways become thinner. Conversely, where entry is viable, and the supply base is diverse, economic participation broadens across production, sales, training, local partnerships, and associated service markets.

- A Radio Review that is serious about growth should be designed to maximise the number of viable providers, not only optimise the position of existing large operators.

This is inseparable from distribution. The Review should examine how platform access and capacity governance shape the market long before formal decisions are announced. This includes the ways in which multiplex ownership, capacity management, ongoing access to FM and AM, and technical upgrade decisions can raise costs, restrict new entrants, and quietly consolidate supply. These are not abstract issues. They determine whether smaller services can launch, whether they can scale sustainably, and whether a plural ecology is practically possible.

Cost pressures must also be addressed with realism. If government expects meaningful local service, including journalism and civic reporting, the cost stack must be aligned to that expectation. In particular, rights costs and other fixed charges can be decisive barriers for non-commercial and social gain services even where carriage is technically feasible. If these pressures are not understood by those designing the Review, obligations risk becoming an unfunded mandate that only larger groups can absorb, with consolidation as the predictable outcome.

The Review should also treat evidence and evaluation as a practical infrastructure problem. Public value is often real but not expressed in a form that is legible to policy and Treasury audiences. Without a credible, proportionate evidence spine that smaller providers can use, the sector remains vulnerable to being treated as anecdotal. A Review that aims to be durable should include a workstream on impact and outcomes measurement that is feasible for smaller services and capable of aggregation into policy-grade insight.

Finally, the Review should explicitly consider technology and innovation in a way that supports distribution rather than centralisation. The next decade will be shaped by platform dynamics and by the “tech and AI” revolution. If the benefits of these tools are captured only by scale, technology will accelerate consolidation. If they are directed deliberately towards cost reduction, shared infrastructure, and lower barriers to entry, technology can widen supply, improve compliance efficiency, increase capacity utilisation, and reduce the costs of production and distribution.

We ask that the Review includes contributors who are actively building and operating such distributed and decentralised practical, cost-down models, rather than assuming that technological change – by itself — naturally produces public-interest outcomes.

We suggest that DCMS already has a credible model for structured civic input to media policy in the Voice of the Listener & Viewer Citizens’ PSM Forum<sup>1</sup>, which has coordinated civil society engagement ahead of BBC Charter renewal. An equivalent mechanism would strengthen the Radio Review: a time-limited Civic Media Forum or reference group, convened alongside the Review, designed to test proposals against public-purpose outcomes, market contestability, and

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<sup>1</sup> <https://vlv.org.uk/news/vlvs-citizens-psm-forum-unveils-joint-statement-ahead-of-bbc-charter-renewal/>

implementation realities. This would widen participation without politicising the process, while strengthening delivery quality and legitimacy.

In practical terms, we ask that you:

1. Establish a time-limited Civic Media Reference Group as part of the Radio Review process, with transparent terms of reference and a defined remit covering contestability, distribution access, cost barriers, and public-purpose outcomes.
2. Convene a ministerial roundtable focused specifically on distribution access, capacity governance, and the cost stack, including rights costs, so that the Review addresses the determinants of viability and supply diversity rather than only symptoms of market stress.
3. Add an explicit workstream on Growth and Distributed Innovation, examining how modern technical practice and AI-enabled workflows can reduce operating costs, widen entry, and expand supply diversity, rather than reinforcing the incumbent advantage created by scale and platform control.

Better Media is convening consultation sessions with practitioners and stakeholders to develop a constructive, evidence-led contribution to these issues. We would welcome the opportunity to provide a short briefing, propose terms of reference for a Civic Media Forum, and nominate contributors who can bring grounded operational experience across community, independent, and civic-facing services.

Yours sincerely,

Rob

Yours Sincerely

A handwritten signature in black ink that reads "Rob Watson". The signature is written in a cursive style with a large initial "R" and "W".

Dr Rob Watson

On behalf of Better Media