Third pillar of media pluralism: community broadcasting in the UK and Europe

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Abstract

Community broadcasting - generally understood to be independent, community-based and not-run-for-profit - has a growing presence in the European media landscape and has gained policy level recognition by the European Union and the Council of Europe as a contributor to media pluralism. Challenging the conventional model of public service broadcasting, the sector has emerged through local and grassroots initiative often accompanied by mechanisms for direct accountability to the community served. The removal of legal barriers to establishment and the provision of public support measures are characteristic of the enabling environment in most countries where the sector has achieved a significant and sustained presence. In the UK, legal, regulatory and funding arrangements to support community radio were introduced in 2004. Five years later, community radio in the UK faces challenges of sustainability. Situating community broadcasting in an international context this paper compares the UK experience with community broadcasting in Denmark, France and the Netherlands. It concludes that public funding is a key factor in sustainability and community benefit.

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"I'm sad to know that you are going off air, and joining a growing list of community radio stations that have had to fold for similar reasons. As the first such station you were an inspiration to many budding community broadcasters…As you know, the two big obstacles for community radio, at present, are (1) the inadequacy of grant funding, and (2) the restrictions on advertising as a component of a station's income."
Blog post by <mwingereza>, 31 December 2009, at http://www.fodradio.org/

1. Introduction

Forest of Dean Community Radio (FoDCR) ceased operations at midnight on 31 December 2009 bringing to a close almost 14 years of broadcasting in the Forest and marking the end of the line for the first community radio station to be licensed under the UK's legal and regulatory provision for community radio services. Awarded licence number CR001, by the communications regulator, Ofcom, under the terms of the Community Radio Order 2004, the station became, in November 2005, the first to launch as a full time community radio service, following a successful pilot scheme. Announcing its decision to close, the station management said: "*Despite many months of effort the project has been unable to secure sufficient funding and resources to enable it to continue until the end of its present five year licence.*" (FoDCR 2009)

The closure of FoDCR is by no means unique. Of 214 stations licensed since 2005, 159 were reported by Ofcom as being on air in 2009, nine had handed their licences back and three (not including FoDCR) had ceased broadcasting. The remainder were "*preparing to start broadcasting*" for which they have a two year window period from the date of licence award. Of the stations on air in 2008/09, 40 per cent reported a financial deficit and the average income of the sector was down 20 per cent on the previous year (Ofcom 2009a). Growing concern at the lack of adequate public funding for community radio has been reflected in the support of 152 MPs for a Parliamentary Early Day Motion in 2007[1]; in repeated calls by Ofcom's Community Radio Fund Panel for an increase in government support for the Community Radio Fund (Ofcom 2008, 2009b, 2009c); and, in 2009, a joint letter signed by 60 station managers and a public e-petition to the Prime Minister which gathered 3432 signatures[2].

This paper provides a European comparative perspective on regulatory and funding arrangements for community broadcasting with a particular focus on Denmark, France and the Netherlands, as well as the UK. The selection of Denmark, France and the Netherlands reflects the prevalence and longevity of community broadcasting in these countries as well as the fact that they are frequently cited as models of public policy support and good regulatory practice (e.g. Sjøberg 1994, Price-Davies & Tacchi 2001,

[1] EDM 922 was tabled by Ian Stewart MP, Chair of the All Party Group on Community Media. The motion calls on the government "*to ensure that the whole of the community media sector has sufficient financial resources, through a fully funded Community Media Fund significantly larger than the current annual £500,000 Community Radio Fund, thus ensuring that the sector is economically sustainable and able to realise its potential to help those most in need*".
[2] The present author initiated and was a signatory to the joint letter to the Prime Minister (published at http://www.sheffieldlive.org/lettertogordonbrown/) and the e-petition (submitted through the 10 Downing Street e-petitions site at http://petitions.number10.gov.uk/allthevoices/)

Buckley et al 2008). Its conclusions focus on the implications for policy making, regulation and funding and are relevant both to the UK and internationally.

For the purpose of comparative analysis the paper mainly examines the situation for community radio. These are understood as independent, civil society-based not-for-profit sound broadcasting services usually with significant community participation in both programme-making and management. In Denmark they are known as non-commercial local radio, in France they are known as *radios associatives* or *radios libres*. In the Netherlands they are referred to as local radio. In all three cases similar policy, regulatory and funding arrangements also apply to local community television and some community broadcasters operate both radio and television services.

2. Community broadcasting in a European context

Recent surveys indicate that there are over 2000 community radio stations in the European Union alone. In Denmark, France, Hungary, Ireland, Italy, Netherlands, Spain, Sweden and the UK they can be heard in almost every major urban area.

Table1. Community radio in the European Union*

Country	*No. of services*	*Legal status*	*Public funding*
Austria	12	No specific provision	No
Belgium	11	Well established	Yes
Bulgaria	3	No specific provision	No
Czech Republic	3	No specific provision	No
Cyprus	0	No specific provision	No
Denmark	175	Well established	Yes
Estonia	0	No specific provision	No
Finland	5	No specific provision	No
France	683	Well established	Yes
Germany	304	Varies region to region	Yes
Greece	10	Mainly unlicensed	No
Hungary	100	Well established	Yes
Ireland	21	Well established	No
Italy	100	Well established	No
Latvia	0	No specific provision	No
Lithuania	0	No specific provision	No
Luxembourg	1	No specific provision	No
Malta	38	Well established	No
Netherlands	264	Well established	Yes
Poland	30	No specific provision	No
Portugal	30	Mainly unlicensed	No
Romania	10	No specific provision	No
Slovakia	2	No specific provision	No
Slovenia	3	No specific provision	No
Spain	130	Mainly unlicensed	No
Sweden	165	Well established	No
United Kingdom	159	Recently adopted	Yes

* Data based on European Parliament 2007, Lewis 2008, plus additional research

As Table 1 indicates, there is great variation in the presence of community radio across the European Union and this is only partly related to population differences. International comparative studies (Price-Davies 2001, Buckley et al 2008) have noted a close correlation between the policy and legal environment and community radio development. It is also evident from recent studies (European Parliament 2007, Lewis 2008) that in Europe the countries with a substantial community radio sector are generally those with a robust legal and regulatory framework, clear public policy commitments to the development of the sector and measures for funding support.

Community radio in Europe typically operates on a mixed funding model drawing on a diversity of sources including public and private grants, service delivery contracts, advertising and programme sponsorship, subscriptions and on-air appeals. Several countries, especially those with a supportive legal and regulatory framework, have public funding measures to assist the sector. The largest and longest established is the French *Fonds de soutien à l'expression radiophonique* (FSER). Substantial public funding measures are also in place in Denmark, Germany and the Netherlands. Smaller funding schemes operate in Belgium, Hungary, Ireland and the UK.

Although the legal and regulatory arrangements for community broadcasting are the responsibility of Member States, there has, in recent years, been increasing policy recognition for community broadcasting at the European level. Jiménez and Navarro (2009) provide a recent overview of community media in European and international communication policies which they situate primarily in the context of policy debate on media pluralism. Of particular note is the Resolution of the European Parliament on community media which calls on Member States "*to support community media more actively in order to ensure media pluralism*" and "*stresses the role that may be played by local, regional and national authorities in supporting and promoting community media*" (European Parliament 2008). In the Council of Europe, community media has also been the subject of an inter-ministerial policy declaration which stresses the desirability of: "*recognising the social value of community media and examining the possibility of committing funds at national, regional and local level to support the sector, directly and indirectly*" (Council of Europe 2008).

3. Denmark – an extended model of public service broadcasting

Community broadcasting *(ikke-kommercielle lokale radio- og TV-stationer)* in Denmark dates back to early experiments with local cable television in the 1970s and a more comprehensive scheme starting in 1983 when the first non-commercial local radio services were licensed on a trial basis (Jauert and Prehn 2003). Community radio was put on a permanent footing in 1986, which was extended to include community television in 1987. Local commercial broadcasting followed later, with advertising allowed from 1989 and the establishment of networks allowed from 2003.

Local radio and television broadcasting remain predominantly non-commercial, while commercial broadcasting competes, at national and regional level, with the public broadcaster, Danmarks Radio and TV2. In 2009, the Danish Agency for Libraries and Media reported a total of 175 non-commercial local radio stations and 277 non-commercial local television stations, included 115 carried on cable systems and 164 distributed by terrestrial broadcasting (Styrelsen for Bibliotek og Media 2009).

The introduction of advertising on commercial radio and television was accompanied by the establishment of a support fund for non-commercial services, based on a tax levied on the commercial broadcasters. In practice little money came from this scheme as the commercial broadcasters adopted avoidance strategies. In 1991 it was discontinued. From 1994, community radio benefited from access to financial support from the state lottery pools. Since 1997, Government funding has been provided for community broadcasting through earmarking part of the licence fee - a tax paid by all households to support public service broadcasting. This arrangement, in effect, treats non-commercial local broadcasters as part of an extended concept of public service.

The support fund for non-commercial local radio and television is administered by the Radio and Television Board - an independent regulatory body also responsible for issuing licences to private and community broadcasters, and for monitoring whether broadcasters are fulfilling their legal obligations. In 2009 it provided a grant-in-aid budget for the year of 52.9 million Danish kroner (c. £6.4 million), of which 35 per cent, or 18.5 million Danish kroner (c. £2.2 million), was allocated for radio and the remainder for non-commercial local television services. Part of the Danish support fund is deployed to support core operating costs and part is provided for programme making, allocated competitively, to promote the provision of local information, citizens' access, support for minority groups and programming quality.

The fund is notable both for its size, being, per capita, the largest of its kind in Europe (at around £0.40 per adult per annum), and for its mechanism, being drawn from funds collected to support public service broadcasting. It was introduced after other approaches had been tried and has demonstrated its stability through changes of government and over an extended period. The dual emphasis of the subsidy scheme on both core costs and support for programme making has enabled some guarantee of economic stability to community broadcasters while retaining a competitive element that can reward good practice in programming making. While there may be policy objections in some countries to deploying the licence fee in this way, Denmark has demonstrated its use without adverse impact on the main public service broadcaster.

4. France – the support fund for local radio expression

France was one of the first European countries to introduce a regulatory and funding framework to support community radio. Over 600 community radio stations (*radios associatives*) operate under a licensing framework that is supported by a cross-subsidy mechanism. Commercial radio and television stations pay a levy on their commercial revenue into the Support Fund for Local Radio Expression (*Fonds de soutien à l'expression radiophonique locale* - FSER). Community radio stations are eligible for support from the fund, amounting to some 50 per cent of their revenue, provided they do not take more than 20 per cent of their revenue from commercial sources.

Community radio in France dates back to unlicensed "free" radio stations (*radios libres*) in the 1970s, when there was a state broadcasting monopoly. In 1982 the Law on Audio-Visual Communication, No 82-652 was adopted providing for the liberalisation of broadcasting and opening up to private radio operators. The same law provided for the creation of the FSER to support local non-commercial radio services in achieving their social objectives. Funding for the FSER is derived from a levy on the advertising revenue of commercial broadcasters.

In 1986 the Law on Freedom of Communication, No 86-1067 provided for the creation of the *Conseil Superieur Audiovisuel* (CSA) tasked with licensing and regulation of private broadcasting services. According to this law the services eligible for support from the FSER are those which receive less than 20 per cent of their revenue from advertising and sponsorship. In Communiqué 34 of 29 August 1989 the CSA defined five categories of private radio service. Category A services are non-commercial services eligible for support from the FSER. Their characteristics include that less than 20 per cent of their revenue is drawn from advertising or sponsorship; at least 4 hours of local programming is broadcast between 0600 and 2200; the licence holder is a non profit association; and the programming is made by the licence holder or its member associations.

The rules for distribution of funds from the FSER are set out in Decree No 2006-1067, which also reformed the functioning of the FSER. The 2007 annual report of the FSER (MCC-DDM 2008) indicates total funding receipts for the year of Euro 25.49 million (c. £23 million), of which 80 per cent was applied to the functioning costs of 588 community radio services (average c. £31,100 each), with the remainder applied to start-up costs, equipment upgrades and discretionary support - through a competitive awards mechanism - for social projects and organizational development. The total income to the FSER amounts to a contribution per capita of about £0.36.

The FSER is the longest established public funding mechanism for community media in Europe. Funding from the FSER meets around 50 per cent of the operating costs of community radio stations in France, with the amount provided being based on a formula that encourages stations to generate funds from other non-commercial sources. The Fund has provided economic stability to the sector over more than 25 years. The historic settlement in which non-commercial stations forego advertising revenue in return for cross-subsidy through a levy on the commercial sector is largely accepted by private commercial broadcasters and has retained public policy support across changes of government. An eleven person commission that oversees the FSER includes four representatives from the community radio sector.

5. Netherlands – a decentralised funding model with uneven results

Community broadcasting in the Netherlands is known as local broadcasting (*locale omroepen*) and is part of the public service broadcasting system. The principal objective of local public service broadcasting was first defined by the Media Act 1987: "*To provide a programme service for general broadcasting purposes which is aimed to such an extent at satisfying the social, cultural, religious or ideological needs of the general public in a municipality or province or the area of the province served by the establishment that it may be deemed to be serving the public interest; and it has a body which determines its programme service policy. The body shall be composed in such a way as to be representative of the main social, cultural, religious and ideological movements within the municipality or province.*"

The Media Act 1987 also set out a number of content obligations for local public service broadcasters. These include a requirement that at least 50 per cent of programming must be of an informational, cultural or educational nature of particular

relevance to the municipality for which the programme is intended. It also provides for a minimum percentage (usually 50 per cent) of locally produced content.

The first experimental local radio stations commenced in the Netherlands in the 1970s with permissions given on a rather ad hoc basis. In 1983 local broadcasting became a recognized sector of the public service broadcasting landscape and standard procedures were put in place to license new services. Initially the services were exclusively confined to cable but after the Media Act 1987, local radio services were also allowed to broadcast on FM. By the year 2000 there were over 300 local broadcasters in the Netherlands, nearly all providing cable and FM radio services. Around one third also provide a local cable television service, although in some cases for only a few hours per month, and around 20 per cent offer a teletext service.

There is generally one local broadcast service licensed per municipality although one service may cover several geographically adjacent communities with the agreement of the relevant municipalities. A local broadcast licensee may also be allocated more than broadcast one channel and may carry different services on FM and cable. The largest service, SALTO, which serves Greater Amsterdam, has six radio channels and two television channels. Of the 600 municipalities in the Netherlands over 80 per cent have access to a local public broadcast service. The combined coverage of the local public broadcasting sector is in the region of 90 per cent of the Dutch population.

Community radio stations are encouraged to seek funding from a wide range of sources including advertising, sponsorship, membership fees and donations. Advertising is limited to a maximum of 15 per cent of airtime on any given day and is also limited to a maximum of 12 minutes in any one hour. Some stations depend almost completely on advertising but most rely also on other sources of funding. The main provision for public funding is through local authorities. Local authorities are entitled to levy a local charge to support the community broadcasting service, however, until recently, they were not compelled to do so and many chose not to. This led to a very uneven pattern of public funding for the sector. The average annual operating cost of a local public broadcaster is in the region of 75,000 Euro (c. £67,000), although the largest service, SALTO, has a turnover in excess of 1.5m Euro (c. £1.3 million). The weak economic base of those stations which do not receive local authority support has a direct impact on programme quality and institutional stability.

Proposals for a national public funding mechanism have been a key policy demand of the sector for several years and have gained recent parliamentary support. A new media law was passed in 2008 (Netherlands 2008) and in 2009 amendments were adopted in parliament placing an obligation on local authorities to fund those costs of maintaining the local broadcaster that are not met from other sources. In addition a motion was passed setting a target of 1.30 Euro per household. The Dutch sector body, OLON (*Organisatie van Lokale Omroepen in Nederland*) is working with the regulator, the Media Commission (*Commissariaat voor de Media*) to ensure these commitments are respected and enforced from 2010 onwards (OLON 2009).

6. United Kingdom – a "broadcasting success" on weak foundations

Community radio in the UK has been relatively late to emerge as a distinct sector, in comparison to most other Western European countries. Plans for a community radio

experiment in the 1980s were abandoned by the Conservative government before the services had commenced and it was not until the 1997 election of a Labour government that community radio re-emerged on the policy agenda. In 2001, the government gave the green light for 16 pilot "access radio" services in advance of planned communications legislation. The "access radio" pilot was evaluated in 2003 and deemed a clear success with community broadcasting being described, by the independent evaluator, Anthony Everitt, as promising to be "*the most important new cultural development in the United Kingdom for many years*" (Everitt 2003).

The Communications Act 2003, in Section 262 provided enabling powers to extend broadcasting legislation to community radio and was followed by the Community Radio Order 2004 which set out the licensing and regulatory arrangements. In 2004, the communications regulator, Ofcom, opened a general call for applications for community radio services from which 194 applications were received. The first community radio to be licensed under the new law was Forest of Dean Community Radio on 11 March 2005. Five years after the Community Radio Order 2004 came into effect Ofcom has reported 214 licences issued and 159 on air (Ofcom 2009a).

Evaluation studies of the sector undertaken by the Department for Culture, Media and Sport (DCMS 2006) and by Ofcom have reached strongly positive conclusions about the effectiveness of community radio in contributing to social gain and community cohesion since licensing commenced under the Community Radio Order 2004. In its Annual Report 2008/09 Ofcom describes community radio as: "*one of the great UK broadcasting success stories of the last few years"*. However, it is equally clear that this success is built on rather weak economic foundations and that many of the UK's community radio stations are operating under financially very precarious conditions.

Under the terms of the Community Radio Order 2004, community radio is generally allowed to receive up to 50 per cent of revenue from advertising and programme sponsorship and not more than 50 per cent of income from any one source of funds. There are greater limitations in areas that overlap with small commercial radio services. No community radio licences may be issued in areas overlapping with a commercial radio service for less than 50,000 population. In areas overlapping with a commercial radio service for less than 150,000 population, community radio services are prohibited from earning revenue from advertising or programme sponsorship[3].

The Communications Act 2003 also provides for a Community Radio Fund to support licensees. Everitt (2003) in his evaluation study of the access radio pilot proposed a mixed funding mechanism for community radio that would assure its sustainability while limiting direct competition with the commercial radio sector. A central element of Everitt's proposals was a funding mechanism that would provide around £30,000 per annum (just over £35,000 at 2010 prices) per station towards core operating costs such as the employment of a station manager. At the time the then Secretary of State, Tessa Jowell, said in a letter to key stakeholders: *"I have now considered Anthony Everitt's evaluation of the access radio experiment and believe that it provides a sound basis for taking the work on access radio to the next level"*[4]. The government's

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[3] The government is proposing to remove the rules preventing establishment in areas overlapping with small scale commercial radio services and preventing more than 50 per cent funding. These changes are included in the Community Radio (Amendment) Order 2010 tabled in Parliament (UK 2010).

[4] Letter to the Community Media Association, dated 8 May 2003

Regulatory Impact Assessment published at around the same time (DCMS 2003) stated: *"One possibility being considered is the creation by Government of an access radio fund to support the establishment and running of access radio stations. If it is decided to proceed with such a scheme the amount of Government support is unlikely to be more than £3 to 4 million per annum."* In March 2004, the Secretary of State announced an intention to proceed with an initial commitment to the fund of £500,000 for 2004/05 (DCMS 2004). Since then, however, there has been no further increase in the annual budget for the fund while the number of licensees has grown from 14 to over 200. The indicative figure of up to £3 to £4 million per annum was either a gross exaggeration of government's real intention or there has been a serious failure of implementation.

When the Community Radio Fund opened in 2005/06 there were only 17 applications and all received approvals of support from the fund, with an average grant per station of £26,119, representing around 20 per cent of sector income. In 2008/09 the Community Radio Fund received 117 eligible applications, against which only 30 grant awards were made, with the average grant per station being just £14,978.

In its Annual Report 2008/09 on the sector (Ofcom 2009a) Ofcom reports that average station income has reduced by 20 per cent on the previous year to just £79,000 and of the stations that submitted returns, 40 per cent reported an operating deficit.

7. Analysis

Denmark, France and the Netherlands are among the European countries that best demonstrate the functional conditions for a substantial and sustained community broadcasting sector. Despite their differences in culture, demographics and in the specific legal and funding mechanisms deployed there are similarities to be found in both the legal and regulatory framework and in the provision of public funding.

Each of these countries has had some form of policy and legal provision for the sector in place for more than two decades. This long term public policy support has been maintained across changes of government and the sustained growth and development of the sector in each case indicates both political recognition of the social and cultural value of community broadcasting in these countries and broad public support.

Table 2. Country comparison in figures

	Denmark	*France*	*Netherlands*	*UK*
Country population	5.5m	64.0m	16.7m	61.1m
Legal recognition date	1986	1982	1983	2004
Number of stations	175	683	264	159
Stations per 100,000	3.2	1.1	1.6	0.3
Total funding	£2.2m	£23.0m	n/a	£0.5m
Funding per station	£12,600	£31,100	n/a	£2,370
Funding per capita	£0.40	£0.36	£0.51*	£0.01

* Target figure set by parliament for implementation from 2010

In all three countries community broadcasting is recognized as a distinct sector both in law and in regulation. Community broadcasting services are operated by civil society

associations and not operated for profit. They utilize a mixed funding model with various restrictions on the amount of commercial revenue that may be raised. All three countries provide significant public funding but through different mechanisms.

Table 2 sets out some of the key statistics. Denmark has the most stations per capita and the highest per capita funding commitment at £0.40 per head for community radio and £0.74 per head for community television services. Funding is provided from a part of the licence fee collected to support public service broadcasting. France, with many more community radio stations to sustain and a much bigger population, has the largest public funding mechanism, although the cost per capita is surprisingly similar at £0.36. The funding mechanism in France is part of a historic settlement with the commercial sector and is based on a levy on commercial radio and television to support community radio stations that accept not to rely primarily on advertising. The Netherlands does not have a central funding mechanism but provides for support through a household levy collected by local authorities. This decentralized mechanism and the fact that it has not been universally applied makes it difficult to obtain information on the total funding provided, however a recent decision of the Dutch parliament has set a target of 1.30 Euro per household (roughly £0.51 per capita).

In 2004 the UK adopted a broadly similar legal and regulatory framework for community radio, with recognition in law as a separate licence category based on a mixed funding model and ownership by not-for-profit community-based organizations. A Community Radio Fund was established which initially provided similar levels of public funding to that which is currently available to community broadcasters in Denmark, France and the Netherlands. While the regulatory framework in the UK has been demonstrably successful in bringing rapidly into existence a range and diversity of new community radio services, the funding mechanism has not kept pace, with the result that there are now real indications of a crisis of sustainability in the sector.

Initially, in 2005/06, the Community Radio Fund provided around 20 per cent of sector income In its 2007/08 Annual Report on the sector, Ofcom noted that the Community Radio Fund accounted for around 7 per cent of total income to the sector. In Ofcom's 2008/09 report, the contribution from the Community Radio Fund had reduced to just 4 per cent of the sector's total income. At the same time average station income had also reduced by 20 per cent on the previous year to just £79,000.

This may in part be linked to broader economic conditions however there is also evidence from reports of the Ofcom Community Radio Fund panel that grants from the fund have provided a significant multiplier effect in increasing funds raised from other sources. It is reasonable to conclude, therefore, that there is also likely to be a reverse effect – if the contribution of the fund to station income is reduced then its leverage effect on other income is also likely to be reduced. In other words the 20 per cent year on year reduction in sector income may also include a reduction in other funds that could have been expected to be levered-in had the fund kept pace with growth of the sector. No doubt the absence of significant core funding for the sector also means that a growing number of stations are competing more intensely for a largely static pot of other national public funding sources, such as lottery grants.

The budget for the Community Radio Fund in the UK amounts to less than 1p per head of population, which, per capita, is about 1/40th of the amounts provided for the

funding mechanisms in Denmark, France and the Netherlands and contrasts starkly with the UK television licence of £142.50 per household that funds the BBC.

8. Conclusions

To the observation that the existence or otherwise of community broadcasting is very often a function of the enabling policy and legislative environment, we can add that the sustainability and social impact of the sector is in significant part a function of the economic constraints and public funding arrangements in place. The distinctiveness of community broadcasting from commercial broadcasting services rests, among other factors, on having a mixed funding basis, one that is not wholly oriented to the logic of commercial revenue and the maximisation of audience share. Public funding for community broadcasting, appropriately administered to avoid undue political interference, has a legitimate role to play and can help to lever additional investment and additional social impact. The experience of Denmark, France, Netherlands and the UK suggests that governments should pay greater attention to the costs and benefits of investment in community broadcasting in comparison both to other public service media and to other goods that contribute to social cohesion and cultural value. It is clearly recognised in Denmark, France and the Netherlands that community broadcasting not only provides valuable social benefits, but is also worth paying for.

The Digital Britain report (DCMS 2009), which sets out proposals for future communications policy in the UK, states: *"if the community radio sector is to grow and prepare itself for a more fundamental role in the future radio landscape it must also be given the certainty to invest in its future".* To achieve that objective requires more than the provisions of the Community Radio (Amendment) Order 2010. If the UK community radio sector is to have the certainty needed to invest in its future, then the regulatory restrictions on commercial funding need to be complemented by adequate public funding investment to assure core costs can be met and to reward community radio stations that are most effective in providing public service content.

References

Buckley, S. , Duer, K., Ó Siochru, S & Mendel, T. (2008) *Broadcasting, Voice and Accountability: A public interest approach to policy, law and regulation*. Washington: World Bank / Ann Arbor: University of Michigan Press

Council of Europe (2009) *Declaration of the Committee of Ministers on the role of community media in promoting social cohesion and intercultural dialogue*, adopted by the Committee of Ministers on 11 February 2009. Strasbourg: Council of Europe

DCMS, Department for Culture Media and Sport (2003) *TV and Radio Services: Regulatory Impact Assessment*, version of 30 June 2003. London: HMSO

DCMS, Department for Culture, Media and Sport (2004) News release dated 5 March 2004. London: DCMS

DCMS, Department for Culture, Media and Sport (2006) *The community radio sector: looking to the future*. London: HMSO

DCMS, Department for Culture, Media and Sport (2009) *Digital Britain*. London: HMSO

European Parliament (2007) *The State of Community Media in the European Union*, Report by KEA for the Committee on Culture and Education (27/09/07). Brussels: European Parliament

European Parliament (2008) *Resolution of 25 September 2008 on Community Media in Europe*. Brussels: European Parliament

Everitt, A (2003) *New Voices: An evaluation of 15 access radio projects* London: Radio Authority

FoDCR, Forest of Dean Community Radio (2009) Press release dated 20 November 2009 [ONLINE] Available at http://www.communityradiotoolkit.net [Accessed 21 November 09]

Jauert, Per and Prehn, Ole (2003) *The Danish Subsidy Scheme for Non-Commercial Local Stations*, Javnost Vol 10, No 1 [ONLINE] Available at http://www.javnost-thepublic.org/article/2003/1/5/ [Accessed 31 August 09]

Jiménez and Navarro (2009) *Community media in European Union communication policies.* Observatorio (OBS) Journal, 9 (2009), 186-199 [ONLINE] Available at http://www.obs.obercom.pt/ [Accessed 4 January 10]

Lewis, P.M. (2008) *Promoting Social Cohesion: The role of Community Media.* Report for the Council of Europe Group of Specialists on Media Diversity. Strasbourg: Council of Europe

MCC-DDM, Ministère de la culture et de la communication - Direction du développement des médias (2008) *Fonds de soutien à l'expression radiophonique locale: Rapport d'activité 2007*[ONLINE] Available at http://www.ddm.gouv.fr [Accessed 31 August 2009]

Ofcom (2008) Community Radio Fund end of year report: 2007/08 London: Ofcom

Ofcom (2009a) Community Radio: Annual Report on the Sector 2008/09 London: Ofcom

Ofcom (2009b) Community Radio Fund end of year report: 2008/09 London: Ofcom

Ofcom (2009c) Community Radio Fund Panel response to the Digital Britain interim report London: Ofcom

OLON, Organisatie van Lokale Omroepen in Nederland (2009) Financiering lokale omroep [ONLINE] Available at http://www.olon.nl [Accessed 4 January 10]

Price-Davies, E. and Tacchi, J. (2001*) Community Radio in a global context: an overview of Community Radio in Australia, Canada, France, Holland, Ireland and South Africa*. Sheffield: CMA

Sjøberg, M. (1994) Community radio in Western Europe. Sheffield: AMARC-Europe

Styrelsen for Bibliotek og Media (2009) *Lokal radio -og TV i Danmark* [ONLINE] Available at http://www.bibliotekogmedier.dk [Accessed 31 August 09]