

The Bishop of Wakefield, Bishop's Lodge,
Woodthorpe Lane, Wakefield

29 January 2002

The Secretary of State
The Department of Culture, Media and Sport
2-4 Cockspur Street
LONDON
SW1Y 5DH

Dear Secretary of State,

Consultation on Media Ownership Rules

The Sandford St Martin Trust was established to promote high quality in religious broadcasting, and Trustees wish to respond briefly to your invitation to comment on the options discussed in your Consultation Paper.

- (a) We see no objection to the removal of restriction on religious organisations holding local digital radio licenses.
- (b) The end of spectrum scarcity should logically lead to the end of all restrictions on religious ownership. More generally, society is unsympathetic to efforts by churches or other organisations to dictate who should or should not own broadcasting outlet, subject, that is, to over-riding monopoly considerations.
- (c) The removal of restrictions would not, however, lead to mainstream churches holding national analogue or digital licenses, or digital multiplex licenses, since they have neither the money nor the inclination to do so. The likelihood, therefore, is that religious ownership would be sought by well resourced US evangelical groups or by other faith groups, in each case financed largely from outside the UK.
- (d) None of this may matter in a situation of expanded public choice, but would the public wish to see ITV, Channel Four or Channel 5 owned by any religious group? It is doubtful that it would. As the Government's White Paper points out, "Religious issues may also shade into matters of political controversy". Public confidence in

News and Current Affairs on channels owned by religious organisations could well be fragile. The same considerations would apply to multiplex platforms owned by religious organisations.

- (e) For that reason, and for so long as the existing analogue mainstream commercial channels (ie ITV, Channel Four and Channel 5) retain a significant proportion of the viewing audience, currently around 45% - then restrictions on religious ownership should be maintained. In the opinion of the Sandford St Martin Trust the audience share of these channels, together with BBC1 and BBC2, will persist rather longer than is sometimes forecast. Even with the eventual migration of these analogue services to digital transmission, at a time which has yet to be decided, their overall attraction to viewers is unlikely to be diminished in the medium term, say over the next 15 years.
- (f) Finally, there is the general point to be made about the comprehensive relaxation of ownership regulation which goes beyond the particular issue of religious ownership. In the enthusiasm for the benefits of increased competition and technological advances, it is tempting to assume that the public good invariably coincides with the priorities of business and technology. Experience in broadcasting and in other areas of public policy shows that these two interests do not always converge. The Trust urges the Government to keep in the forefront of its thinking its own commitment to plurality and diversity as vital for a healthy democracy. Section 1 of the Consultation Paper puts these arguments with great clarity, and they should be kept in mind at every stage of the legislative process.

Signed:

+Nigel McCulloch, Bishop of Wakefield
Chair of Trustees

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