



Response to the BBC Trust's August 2015/September 2015 consultation regarding BBC Three from the #SaveBBC3 campaign.

Compiled by Jono Read on 28 September 2015.

Introduction

The BBC's mission statement for nearly 85 years has been 'to inform, to educate and to entertain'. We can think of no other service that fits this remit better than BBC Three with its award-winning drama, thought-provoking documentaries, engaging television debate, news in bitesized chunks, wall-to-wall music festival coverage, and space to nurture new talent like writers and comedians. The provisional decision you took in June 2015 to agree with the BBC's plans to halve the content budget and move the channel off our TV screens went against your own ICM telephone and the BBC's GfK polling, your own original consultation of 23,000 responses, the BBC audience councils in England, Scotland and Northern Ireland¹, and the 300,000 names on our #SaveBBC3 petition.²

The chair of the BBC Trust³ and the BBC Director General have called for viewers' opinion to be at the centre of any decisions on the BBC - so we are asking once more that viewers are listened to. The BBC is a publicly-owned organisation and it is ultimately people like us - the viewers and licence fee payers - who should be the ones to decide the future of its service. The scale of support for a service helped overturn proposals to close 6Music, we do not see why this one should be any different⁴.

The emphasis of the BBC Trust's conclusions from June appears to have applied more weight to the perceived savings of the package, rather than viewer opinion. But we believe these proposals may end up costing the corporation more money. That is due to the re-spend of all savings on the BBC One audience in addition to an increase in marketing and spending money on an online brand, new online partnerships, as well as possible spends from a BBC1+1, extended CBBC, and changes to iPlayer.

BBC Three

Overview

We are concerned that the BBC is at risk of alienating audiences and subjecting itself to a legal battle if it presses ahead with the package of proposals.

It is our view the suggested conditions outlined in your last decision do not go far enough in addressing the concerns we have raised since March 2014. We are particularly concerned by the

¹ [BBC Audience Council England Submission](#)

² [Save BBC Three Petition at Change.org](#)

³ [BBC's future should be decided by the public rather than politicians, says head of Trust Rona Fairhead](#) (17 August 2015)

⁴ [6Music Saved From Closure](#) (5 July 2010)

concerted effort to dismantle the channel before any final decision has been made, and we believe this should be factored in to consideration when analysing the small drop in viewing figures in recent months. BBC Three's growth has been relatively flat due to this, but E4 and ITV2 has seen "moderate growth"⁵.

Fellow viewers have been subjected to the same Family Guy episodes 5 nights a week, and in recent months the same films for three or four Saturday nights in a small period of time, while new content has been switched around to BBC1/2. A new series of Orphan Black this month aired around 2am rather than the primetime television slot it should have had, with the aim to decrease viewing figures on TV and to increase online interest. Popular programmes like In The Flesh and BBC's Free Speech have already been axed. Should the BBC choose to end this dismantling, we think the channel would have the same successes E4 and ITV2 reports, although we suspect this would not help the BBC's justification for closing the channel. The Public Valuation Assessment's purpose was to test whether the shift in audience from TV to online was strong – we are unconvinced from the evidence in the documentation that this is true. As the BBC Trust puts it "television still remains important, located in an experience that it is familiar, effortless and social".⁶

We believe not enough weight has been applied to viewers' opinions - for example the Trust's own ICM polling or comments from the previous consultation process. We believe figures from both the BBC's failed experiments airing BBC3 shows on BBC One and Two as well as the Market Impact Assessment of viewing habits support keeping the channel on TV.

While the BBC refers to changing viewing habits of young people, it should not ignore that there is a preference still to watch programming on TV. In recent months programming on BBC Three has trended on Twitter as it broadcast live (like the World's Worst Place To Be Disabled and Girls Can Code) and with 'BBC Three' trending during the Glastonbury festival coverage. It supports our view that online audience enjoy watching shows on television and talking about it on social media when it premieres. As Communications Chambers reports broadcast channels are predicted to see a "relatively stable viewing of broadcast channels" with UK viewing to rise from 80bn hours in 2013 to 85bn in 2018 despite the advances of PVRs and internet services.⁷ Moreover the Market Impact Assessment reports Netflix is less common in homes where Freeview is used – suggesting premium broadcasters like Sky have more to fear than the BBC.⁸

A majority of BBC Three viewers (72%) surveyed by ICM said they preferred watching the service on TV⁹, while just 14% of those interviewed by GfK expressed favourability for the proposals, compared to 32% against the proposal, and 16% extremely unfavourable¹⁰. Indeed only when the BBC spoke of a BBC1+1 was there favourability for the package of changes¹¹ as it admits "a vast majority of viewing still takes place on linear channels". This does not support the suggestion television is no longer popular, and does not warrant removing the one television channel which reaches young and diverse audiences that BBC One, Two and Four cannot.¹² Even James Purnell, the BBC's Director of Strategy, claimed this month the BBC does not envision a greater shift from television. He told the

⁵ [Market Impact Assessment by Communications Chambers](#) (Page 20)

⁶ [Provision Conclusions](#) (Page 10)

⁷ [Market Impact Assessment by Communications Chambers](#) (Page 17)

⁸ [Market Impact Assessment by Communications Chambers](#) (Page 18)

⁹ [ICM Quantitative Research](#) (Page 4)

¹⁰ [Summary of results from the quantitative research regarding proposed service changes](#) (Page 4)

¹¹ [BBC Three Application](#) (Page 9)

¹² BARB 2014

DCMS Select Committee: “I don’t think channels are going to get replaced by on-demand. They're going to be around for a long period of time”.¹³

We think the BBC will find it difficult to capture the attention of young people for long periods online in the same way it can do with television. This is supported by the fact the % of 16-34 year olds watching iPlayer recently fell to 38% in April 2015¹⁴ – approximately the same proportion as when it launched in 2008. 57% of those surveyed by Gfk for BBC said they watched online TV and video services because they been made of it aware through TV, while 22% said word of mouth.¹⁵ Where will the catalyst be for BBC Three online without a television service?

The BBC describes the closure of a popular well-established service on television and the move online as an “experiment”. We are concerned, despite underwhelming feedback from the audience, the BBC will not have to demonstrate the successes of this “experiment” both with viewing public and talent take up before it takes off the television channel. With millions of pounds invested into this BBC channel we do not agree with gambling its future with a rushed strategy that ignores the concerns of the majority of its viewers. The Trust has not alleviated our concerns.

Airing content on other services

We think the BBC executive has failed to offer clarity on the future of BBC Three programming on BBC One and Two. The BBC Trust’s conditions do not go far enough in offering safeguards if the service is forced online.

There were no programming or spend quotas put in place to ensure enough programming exclusively for the 16-34 year old audience appears on One & Two. The language in the BBC’s initial proposals include words such as “we would like” rather than something more assertive. With only two hours of long form content being created per week it is unlikely the BBC will be able to match on existing services what is provided on BBC Three on TV at present, or what was available before the creation of BBC Three.

The timeslots suggested by the BBC around 10.30pm or 11.20pm during the week will be far too late for audiences that have school, college, or work the next day. These timeslots appear to change daily, which is likely to ensure low viewing figures.

Viewing figures for new Family Guy episodes on BBC Two (on average around 50% smaller) indicate how difficult the job will be to move the BBC Three audience to online viewing¹⁶. Even a change in channel produced much smaller audiences compared with BBC Three showings of the same episodes, despite considerable spend on advertising for BBC Two and none for the BBC Three showing. The change of times every week will not have helped – an issue that will arise when programming is forced on to other channels due to BBC Three’s closure. Family Guy begun airing on BBC Two around 10pm, but towards the end of the run was airing at 11.10pm due to live events and after midnight in some instances on the regional variants of BBC Two.

The smaller figures for Family Guy was not a one-off situation. Hair’s audience figures also dropped (on average) by half after the move. Russell Howard’s Good News received significant amounts of publicity on BBC Two but did not perform as well¹⁷. Don’t Tell The Bride increased its audience on

¹³ [Purnell and Hall talk BBC3 in Parliamentary Session](#) (15 September 2015)

¹⁴ [BBC iPlayer's Poor Traffic Figures: Another Blow To BBC Three's Online Plans](#) (29 May 2015)

¹⁵ [Summary of results from the quantitative research regarding proposed service changes](#) (Page 7)

¹⁶ [Can BBC TV retain the young?](#) (26 August 2015)

¹⁷ [Can BBC TV retain the young?](#) (26 August 2015)

BBC One with mature audiences, but performed worse with the BBC Three audience of 16-34 year olds. This was, in part, due to BBC bosses chasing ratings by adapting the programming rather than thinking of the younger viewers and what they enjoy.¹⁸

If programming carries on like this and BBC Three closes the shows will soon be sidelined for ratings winners – most likely for formats appealing to older audiences like with Don't Tell The Bride. The BBC has offered only vague commitments in its response to the BBC Trust to continue airing these shows until BBC Three is established online. What will determine when the new online service is successful enough to pull the plug on programming on BBC1 and 2?

Finally, concerns have been raised with the #SaveBBC3 campaign about the loss of accessible TV programming for young deaf or blind people. We would like the BBC to consider how it will deliver television programming to young people who watch BBC Three content at night during the sign zone, or watch with audio description turned on – it is likely to limit what is available to them on TV when BBC Three closes. While there is a limited amount available on the iPlayer (albeit away from the main content) this is likely to penalise those who cannot access these services online. Furthermore, with the focus of the new BBC Three on short-form content and use of third-party providers it is unlikely to bring these additional benefits¹⁹, particularly given the BBC's strategy to partner with other websites. We must therefore ask how will these viewers will be served? The BBC's Equality Analysis has given little consideration for these groups, was this merely a tickbox procedure?

We believe the BBC Trust's conditions at present do not go far enough in protecting the BBC Three audience who will be unable to view new online services or have no desire to watch online (53% of those surveyed by ICM said they would not watch, a similar number to the GfK survey²⁰). We are not convinced or satisfied by the BBC's proposals for airing programming on other channels, and whether this would be sustained in the long term. The BBC also needs to demonstrate how it will protect audiences who access the sign zone and audio descriptions services – they are likely to suffer with the move towards short-form content.

Preventing Audience Loss

The BBC Executive tried to justify closing BBC Three by arguing that the audience is all moving online. Yet they admit there will be a loss in viewers due to the move, it is very contradictory. This is supported by OFCOM's own analysis and the BBC's Market Impact Assessment which estimates those that consume the most amount of BBC Three viewers will be lost to competitors such as E4 or ITV2, or even other networks²¹. Losing such audiences to other TV channels contradicts the BBC's own aims to "better appeal to young audiences"²². The BBC Trust currently expects the BBC to lose 3.4% of 16-24 year old viewers across the corporation²³

Just this month James Purnell, the BBC's Director of Strategy and Digital, told the DCMS Select Committee that a "big part of the youth audience that had limited access to online content at all".

¹⁸ [Don't Tell The Bride is not the show I fell in love with](#) (29 July 2015)

¹⁹ [BBC Equality Impact Assessment](#) (Page 2)

²⁰ [ICM Quantitative Research](#) (Page 5)

²¹ [Market Impact Assessment from OFCOM](#) (Page 34)

²² [Our objectives for 2015/16 - BBC](#)

²³ [Provisional Conclusions](#) (Page 10)

He used this reasoning to defend a BBC1+1 but it appeared to contradict the BBC's strategy to close BBC Three²⁴

The BBC Trust last year highlighted BBC Three's success at reaching young and diverse audiences in particular younger viewers, C2DE adults and those from black, Asian and ethnic minority groups. The Trust also criticised BBC One, Two or Four for failing to reach them. It claimed at least one million BBC Three viewers watch no other BBC channel.²⁵ It is our view no service should close – but we believe there were a number of other options the BBC could have considered to stop the BBC losing a loyal, young audience that watches BBC Three.

Given the BBC's objectives include reaching out to younger and diverse audiences, targeting services which fail to reach those demographics would perhaps have been more advisable. One option could have been to merge BBC Two and Four given its similar demographic, and the smaller audience numbers on BBC Four. Alternatively One and Two could have redistributed funding to support Three in an attempt to keep those young audiences. It is, after all, more in line with the BBC's mission statement.

The BBC could have reduced BBC Three's broadcasting hours to start later and finish earlier (fitting in with the BBC Trust's previous recommendations to cut investment before 9pm²⁶) and saved money by subletting or selling the spare space instead of using CBBC. It could have used the channel to showcase existing online content - such as Radio 1's visual content or BBC comedy feeds (benefiting existing BBC services on the web – and helping to increase satisfaction in online services which we note fell according to the latest Annual Report). It could have also considered repackaging content from the BBC's archives. Reshowing content from the BBC's archives for instance could have satisfied the BBC Trust's wishes to see more of the arts on BBC Three²⁷, and could still bring in significant ratings, particularly with music coverage. It could have also worked with other organisations to run the channel.

The BBC should be forced to prove the effectiveness of a new online BBC Three if it launches - before it should be allowed to close the channel. It should be prepared to move to a Plan B for BBC Three if this service does not meet the BBC's mission statement for 2015/16 to reach out to more young and diverse audiences.

The one TV that dared to be different

We have already witnessed how moving programming off BBC Three on to BBC One and Two can stifle innovation. Don't Tell The Bride on BBC One was perceived as less unique than on BBC Three, which explains the smaller 16-34 year old audience.

We believe that BBC One and Two are more interested in chasing ratings and playing it safe than airing programmes that "dare to be different". It is BBC Three that has been where the awards have been won over its 11 year history. Now BBC One is set to gain funding from BBC Three's cut content budget meaning less money for more distinctive content.

One of the key remits of BBC Three is to "aid the discovery and promotion of the best of British talent". We feel the BBC will not be able to do as much of this on television without BBC Three. We are also concerned the smaller focus on long-form content for BBC Three will take it away from the

²⁴ [Purnell and Hall talk BBC3 in Parliamentary Session](#) (15 September 2015)

²⁵ [Service Review of BBC Television](#) (July 2014, Page 14 & Page 16)

²⁶ [Service Review of BBC Television](#) (July 2014, Page 34)

²⁷ [Service Review of BBC Television](#) (July 2014, Page 25)

international stage. James Corden would not be presenting a popular television show in America if it wasn't for the likes of Gavin and Stacey. Being Human and In The Flesh are talked about internationally. Little Britain led to Little Britain USA. Without BBC Three on TV we do not think the BBC will be able to reach this ambition, and we are disappointed the BBC Executive provided no clear plans of how it will nurture new talent on BBC One or Two without it.

The BBC Trust last year criticised the BBC for its failed attempts to deliver news to younger and lower socio-economic groups, with BBC Three being one of the exceptions²⁸. 60 seconds reportedly reached over 6 million viewers a week. We note the Trust's praise for the "risky" and "challenging" current affairs programming on offer on BBC Three compared with other stations too, we believe these programmes should be seen by the widest possible audience. The admission the BBC will lose young audiences with the proposal will put this good work at risk.

While the BBC Trust acknowledged in its previous findings that it is concerned about the impact on talent we believe measures need to be in place to review the interest in the new service. This is why a long transition period is essential, with the option to resume the TV service if the online service fails. Furthermore, we are concerned the BBC has not planned for areas on BBC One and BBC Two to nurture new talent.

Broadcasting Space

The BBC Executive has refused to reveal how it would use the space on Freeview, YouView, FreeSat, Virgin and Sky if BBC Three was to close²⁹. It also has not explained how it will use the space for BBC Three HD, or indeed the space earmarked for BBC1+1 which was additional to those slots.

The BBC could sublet these spaces but it will be subject to a number of conditions and the executive appears to admit the broadcast hours of these slots will be less desirable. If it does this it is likely to lose crucial EPG slots that helps to give the BBC's TV channels such prominence³⁰. Losing BBC TV services would diminish what is on offer 'Free To Air' (especially on Digital Terrestrial Television), particularly with the 16-34 year old market. The market impact assessment only suggested minimal impact on the proposals if all of the package was implemented, but this was based on BBC1+1 being created. What effects will there be without it?³¹

If the BBC keeps the spaces it will not save as much money as planned, but we believe it is essential for ensuring the BBC has the room to broadcast the vast amount of programming it has available. In particular broadcasting live events and music coverage which cannot easily fit into existing schedules. For example, the Women's World Cup, the Olympics, and Glastonbury – all of which was covered in High Definition on BBC Three and would be impossible to fit it all into existing schedules on BBC One, Two, Four or the single Standard Definition stream for BBC Red Button.

A clear condition should be for the BBC to explain how it will use any vacant space from the closure of a service before allowing the sale or subletting of space. Better still, the BBC Trust should force the BBC to keep BBC Three as it will help enhance the BBC's overall offering – television can cut through where the internet cannot. Keeping it will secure a prominent EPG slot, and the space for overflow of popular event coverage for those who cannot access services

²⁸ [BBC Trust Review / BBC Network News and Current Affairs](#) (Page 39)

²⁹ [The BBC Executive's response to the BBC Three PVT provisional conclusions](#) (13 August 2015)

³⁰ [The Battle for BBC Three's Freeview Slot](#) (2 September 2015)

³¹ [Market Impact Assessment](#) (Page 47)

elsewhere. With BBC1+1 likely to be rejected we think the Trust needs to review what effect this will have on the market if BBC Three was to close too.

Finally, would like to remind the Trust that the channel outperforms BBC Four in ratings on a weekly basis³², and during the last festive period performed as well as the main five terrestrial channels in the ratings³³. Will the BBC Trust reveal detailed figures from any online service and will it do so during the transition period before any potential closure of BBC Three on television?

Transition Process

We believe the BBC has failed to demonstrate a strong transition process between BBC Three on television and the new BBC Three online.

The BBC Director General has made clear he would rather have done this over five years³⁴ - something the BBC Trust chair appeared to agree with in subsequent interviews³⁵. To launch a new service and close an existing one within 2.5 months is unworkable. We have found far too many young people are unaware of these changes are still happening 18 months after being announced. This is in part a failure of the BBC and BBC Trust to explain the proposals in the consultation periods.

The BBC has already admitted based on their own research there is “very little appetite” for the move³⁶, and so we believe it would be detrimental to any new online services to rush the move. By speeding up the process the BBC will penalise the poorest households in Britain (18% of Brits do not have internet access³⁷), and a large number of young people in rural and some urban areas who will still be waiting for superfast broadband rollout in 2017³⁸. The BBC Trust admits less than half of digital receivers are internet-enabled, while just 12% of homes have Smart TVs³⁹. We also note that the offering of the BBC on different television platforms do not always match what is available online. These issues will leave barriers for the social experience of watching television, and will leave many without access to high quality broadcasts when BBC Three HD is removed. From our social media channels and petition we have experienced a number of young people questioning the value of the licence fee, which we fear does not bode well for the future of BBC funding.

We believe rushing the transition period will cost the BBC an extortionate sum in advertising as it tries to communicate the message over social media to attract the widest possible audience. Had it been done over a longer period of time, more viewers would be aware of the changes, and might have been won over without requiring the bigger spend. Having existing television services which serve young audiences well already would be a good catalyst to transporting the BBC Three audience online – something the BBC does not appear to accept in its plans. This is supported by OFCOM’s analysis for the BBC Trust, which suggests users of the iPlayer seek out specific content they are already aware of.⁴⁰ It is also supported by the successes of Radio 1, which carries on investing in traditional methods of broadcasting (for example on FM), as well as additional new methods (on

³² [BBC Annual Report 2015](#) (Page 69)

³³ [Mrs Brown’s Boys leads Christmas Day ratings with over 7 million](#) (26 December 2014)

³⁴ [BBC One to get £30m from Three Closure](#) (6 March 2014)

³⁵ [The Media Show on Radio 4](#) (22 July 2015)

³⁶ [Public Value Assessment of the reinvention of BBC Three online and related proposals](#) (January 2015, Page 52)

³⁷ [Ofcom: 18 percent of Brits have no internet access](#) (9 December 2014)

³⁸ [Councils fear superfast broadband rollout delay](#) (March 24 2015)

³⁹ [Provision Conclusions](#) (Page 11)

⁴⁰ [Market Impact Assessment from OFCOM](#) (Page 2)

iPlayer radio, on the visual version of the iPlayer, and on YouTube). This did not have to be done with any additional extravagant advertising spend, or new brands like the BBC proposes for BBC Three, because audiences naturally found it through listening to the shows.

Finally, we are concerned about the use of other providers for BBC Three content. In particular tie ups with YouTube, Google, Facebook, BuzzFeed, and VICE⁴¹. Is this an admission that the service on iPlayer is not satisfactory for an online BBC Three? If so, shouldn't be BBC ensure it is satisfactory and wide-reaching before it makes such moves online? We also believe these commercial deals could open the BBC up to legal disagreements from rival companies who also want to strike up deals (we note Virgin's correspondence earlier this year).⁴² We question how distributing content away from the iPlayer would fit in with any possible plans to charge to watch content online as a way to bring in additional revenue.

We believe this process is being rushed through to avoid the consequences of possible legal action from Avalon and Hat Trick⁴³, and believe without a longer timetable the approach could end up alienating the 16-34 year old audience.

We believe the best way to reach 16-34 year olds is to continue with BBC Three on TV. However if the BBC Trust still sees fit to close the channel it must specify a longer timeframe for transition between TV and online, and reject plans from the BBC to close it within 2.5 months of the new service starting. The fact the BBC are looking to partner with other services suggests the BBC iPlayer is not really designed for these new services, and should be looked at with urgency if this is the direction the BBC is moving to. Greater emphasis at the BBC appears to be on using third party programming than repurposing the service for television services.

Cost Effectiveness

The BBC and BBC Trust has mentioned the importance of finding value for money with BBC Three, but the BBC Trust's research has already found that viewers are less likely to take to a new online service reducing the value of the station. We note while BBC Three only costs 8.1p/hour in 2014/15 (6.9p in 2013/14) to produce on TV, the new online service is estimated to cost 23p/hour due to the drop in audience⁴⁴. This is a significant increase and throws into doubt the claims the service would bring value for licence fee payers. We are concerned should these costs remain high it will again justify closing this service outright.

Consequently we believe the BBC Executive's proposals have gone from being a money-saving exercise to a face-saving exercise. These proposals were announced long before the BBC had even considered further efficiency savings, or reducing the cost of management or high-paid talent⁴⁵. We are concerned the number of senior managers at the BBC paid more than £160,000 has increased from 66 to 74 in the past year⁴⁶. Why are cuts to services being proposed before pay of those at the top?

The Director General said he did not wish to "salami slice" budgets when he announced closure of BBC Three⁴⁷. But these proposals appear almost cost-neutral and involve significant spend despite

⁴¹ [BBC Three Proposals are unveiled](#) (10 December 2014)

⁴² [Virgin Response to the BBC Trust consultation](#)

⁴³ [BBC Three duo threaten Trust with judicial review](#) (1 September 2015)

⁴⁴ [Public Value Assessment of the re-invention of BBC Three online](#) (Page 10)

⁴⁵ [Wage bill for BBC's top earners rises by a fifth](#) (14 July 2015)

⁴⁶ [BBC 'in fantasy land' after defending high salaries](#) (15 September 2015)

⁴⁷ [BBC Three proposals announced](#) (10 December 2014)

the closure. The limited savings will not come from taking the service off our television screens, but regrettably by almost halving the programming budgets, and immediately respending them. The BBC is also wishing to triple advertising spend⁴⁸ because it is rushing the proposals and has failed to demonstrate a sensible transition plan. At the Edinburgh TV Festival we were told no detail about what that cost is in value terms, and the BBC remains shady about the figure. It is also looking to re-spend money on a “new visual identity” from November⁴⁹ and partnerships with YouTube, BuzzFeed, etc. Already it is spending significant amounts on social media advertising – something we do not believe is value for money or a good use of licence fee when the BBC has huge numbers already registered with its social media channels, and has the television and radio platform to promote new shows. It also proposes commercial linkups to promote BBC Three content, which again seems to be a failure the iPlayer on its own can bring traffic to BBC Three online. The cost of these partnerships are also unknown, so we cannot assess whether the impact will bring value for money.

Depending on what the BBC does with the vacant broadcasting space and existing carrier contracts it will still be spending a considerable amount of television transmission too, while still looking to spend more money on BBC1 with a +1 and programming including £30m for BBC One drama (despite BBC One having a massive budget already, and most other areas facing cuts). We note the true costings for these plans have, however, been redacted from the BBC’s response.

With regards to investment online we do not disagree with the BBC investing in short form content – as it already is doing – but we believe it needs to be sensible with licence payers’ money. Currently the BBC’s social media channels spend more time posting GIFs unrelated to BBC programming than it often does to promote its programming. Comments in response to promoted posts on Twitter (particularly in response to listicles) have not been positive. The recent Orphan Black iPlayer ‘tweetalong’ had very little interest⁵⁰ The BBC has not adequately explained in its plans what the short form content will focus on – but creating a community of BBC Three viewers promoting new programming should be a priority. We believe the content needs to be distinctive to set it apart from other websites on the internet to justify the 20% spend, and must be clearly measurable. As much of this content is already being developed we see no reason why a refusal would impact this.

As for long form content we believe the BBC must continue to invest in it, and this should be the focus. We are concerned that BBC Three is already being positioned as a channel for short form content, and we are concerned this will be its future⁵¹. This would be a change from what is currently proposed. The websites the BBC cites in justifying closing BBC Three on TV (Vice or Netflix) did not become a success by cutting investment. Irrespective of the final decision the BBC Trust must request the BBC spends more on long form content – the sorts that has won the station more awards than any other competitor. Good content and word of mouth is often what drives people to a programme. To halve the programming budget and spend three times as much money trying to push users to watch online demonstrates the flaw in the argument.

The BBC has admitted the savings of £30m will be respend on BBC One drama, however, it ignores the additional spend on a new brand, new partnerships, advertising, and the lack of plan for existing carrier costs which will cost the BBC more money. Once BBC+1 and CBBC is factored into the proposals there will be a greater spend – even if there is a minimum proposed spend. We think the BBC should be forced to detail costs to prove this will be cost-effective. Lord Hall

⁴⁸ [BBC3 ad spent to triple as TV channel set to close](#) (12 August 2015)

⁴⁹ [BBC3 ad spent to triple as TV channel set to close](#) (12 August 2015)

⁵⁰ [BBC Three Tweetalong](#) – Twitter.com (28 September 2015)

⁵¹ [BBC at Encounters: The future of short form channels](#)

promised more transparency at the BBC, and more extensive information would be welcome on this.

BBC1 Drama

The campaign notes the number of announcements the BBC has come out with since the proposed closure of BBC Three was announced. This includes the launch of a new BBC Music Awards ceremony to rival the BRITs⁵², £30m for BBC1 Drama, a BBC1+1, a BBC ideas service⁵³ a new iPlayer for third party content and commercial organisations, content and reporters for local newspapers⁵⁴, mini-computers for schools⁵⁵, a streaming service to rival Spotify⁵⁶, a new version of the iPlayer for children, and services for North Korea and Russia⁵⁷. All which will come at a cost, all at a time the Director General has argued the BBC has no money to continue services like BBC Three on television. The message from the executive has therefore been contradictory.

We are disappointed there is no opportunity to input into the consultation the BBC's desire to reuse £30m of BBC Three's budget on BBC One drama given that the BBC has admitted this is its "key reason" for closing BBC Three. The budgets for BBC One are already significant, and we simply cannot understand why Lord Hall wishes to reuse budgets for young adults on an audience already well served by the BBC. Other areas are facing cutbacks but for reasons unclear to us the BBC are increasing budgets for drama. Production costs have not increased, and the information in the application suggests this is predominantly to chase ratings.

BBC Three has been an excellent channel for broadcasting award-winning dramas over the years. Due to cutbacks, however, those shows have been lost. This has disappointed many of the young people this campaign has reached. We do not think the BBC would have produced *In The Flesh* or *Being Human* without BBC Three, and we are disappointed they were lost due to cuts. The BBC would be wise to carry on investing in BBC Three dramas like the BAFTA-winning *Murdered By My Boyfriend* and *Don't Take My Baby* instead, and shows like the aforementioned programming. We do not think content for young audiences during the General Election would have been as engaging without live debates like *Free Speech* offered.

If Lord Hall truly wants to spend the budget on programming that leaves a legacy he would invest in long form content for BBC Three – rather than focusing on short-form content – which has an impact around the world, is award winning, and in the case of drama and documentaries receives great praise. The government's green paper has called for the BBC to be distinctive in its offering – which is exactly what BBC Three does. Increasing budgets for BBC One drama in the name of ratings is what the green paper advises against, especially as the BBC admits it is being done to compete with pay services.

BBC One is significantly funded by the licence fee and we are not convinced there is a strong case for diverting more funding to this channel, especially at the risk of distinctive content for young people. There does not appear to be an urgency for this funding, so we believe the Director

⁵² [BBC announce new Music Awards](#) (June 2014)

⁵³ [What is the BBC Ideas Service?](#) (7 September 2015)

⁵⁴ [BBC will offer staff and content to help local newspapers](#) (7 September 2015)

⁵⁵ [BBC gives children mini-computers in Make it Digital scheme](#) (12 March 2015)

⁵⁶ [Music Industry warns on BBC plans for new streaming service](#) (10 September 2015)

⁵⁷ [Plans for BBC 'North Korea' met with scepticism](#) (8 September 2015)

General should be forced to look elsewhere for the savings. Doing this would support the ambitions of the government's green paper.

BBC1+1

Young audiences are critical of creating a BBC1+1 at a time when the BBC executive argues audiences are moving online and use iPlayer, and we can understand why. Under normal circumstances a BBC1+1 might have been welcomed, but we disagree with this being a priority when it argues the need to cutback. There would still be costs involved with running this service – in particular with broadcasting on Terrestrial, Satellite, and Cable. We fear the launch of a BBC1+1 would only lead to a BBC2+1 and BBC4+1 as a result and would diminish the offering on digital television platforms. All when existing services are at risk.

As we previously mentioned these proposals are a contradiction of all that the BBC directors have argued for with BBC Three – including the claims that a significant chunk of the BBC Three audience cannot access online services, and that television channels are unlikely to be replaced by on-demand.⁵⁸

We are not convinced even if this service is rejected by the BBC Trust that these proposals will not resurface at a later date, and would like this to be addressed in the final decision.

CBBC

We believe the BBC has not justified the case to extend CBBC hours at the same time it is making cutbacks with the BBC Three audience. Without additional budget we are concerned the creation of more 'distinctive' content may impact existing broadcast hours. Moreover the proposals are reliant on the closure of BBC Three which we do not agree should be closed, so we cannot support this.

The approval of these proposals go against the BBC's audience councils and the BBC Trust's ICM polling again which found audiences felt the existing broadcasting hours of 7am to 7pm were appropriate, and an extension of hours could disrupt families⁵⁹. **This should not be approved while there is still a case for keeping BBC Three on television.**

Conclusions

The #SaveBBC3 campaign has engaged with the BBC Three audience on a daily basis through email and social media since the proposals were first announced 18 months ago, and has listened to the views of young people throughout.

We do not believe the BBC Trust conditions go far enough to protect the BBC Three audience and safeguard the future of the service, and we are dissatisfied with the latest response from the BBC executive. We do not believe the BBC has made any compromises since the proposals were first revealed to try to alleviate our concerns.

While we welcome innovation and new ideas for BBC Three on the internet, we believe removing BBC Three from television would be "a premature" (in the BBC's own words⁶⁰) and backwards step

⁵⁸ [Purnell and Hall talk BBC3 in Parliamentary Session](#) (15 September 2015)

⁵⁹ [ICM Quantitative Research](#) (Page 55)

⁶⁰ [BBC Three Application](#) (Page 2)

for the corporation which prides itself on universality. In this document we have set out further conditions we expect the BBC Trust to include in its final recommendations.

Our belief remains that the best solution would be for the BBC Trust to reject the proposals for an online-only BBC Three as well as the other television plans in this package. These proposals do not save the BBC money, with additional spends on new brands, advertising, and partnerships we believe they may prove more costly. They are certainly far from cost effective.

By rejecting the plans BBC Three could continue broadcasting as a universally available TV channel for the foreseeable future – broadcasting to an under-served demographic and bringing the most value for the BBC.

The BBC would be able to continue to work on making BBC Three more established online through social media and short form content (as it is already trialling now), but would also be able to continue to make distinctive content for TV that it is internationally-renowned for producing. This could act as a catalyst for a new online service, without directly replacing it.

With the rejection of the proposals we advise that the BBC Trust reviews what it currently offers on BBC Three to save money (using content from across the BBC to appeal to existing and new audiences, and reviewing broadcast hours to consider an extended CBBC in future), and reinvests the money back into BBC Three content that is currently earmarked for advertising budgets and branding, and the possible spend on BBC+1 and BBC One drama.

This will ensure the nation has access to superfast broadband, and young audiences have more time to purchase the appropriate technology to stream in new ways before any further steps are taken.

With a Charter Review pending it seems logical to wait to see what the BBC's future holds.

Moreover rejecting the BBC Three proposal will demonstrate the Trust does represent what viewers are currently wanting - which is to #SaveBBC3.

About the #SaveBBC3 campaign

The #SaveBBC3 campaign was created by fans in response to the Director General's announcement that BBC Three would close to create £30m worth of savings which would fund a BBC1+1 and additional BBC1 dramas.

Over the past 18 months it has encouraged opponents of the proposals to sign an online petition at www.change.org/savebbc3. In February 2015 a petition containing 271,886 was handed to the BBC Trust. The petition has now reached the landmark of over 300,000 names, and the remaining 29,000 names and comments will be submitted to the BBC Trust as part of the latest consultation.

The campaign is led by BBC Three viewer Jono Read from rural North Norfolk. It is made up of other BBC Three viewers and fans of shows, people from the creative industry, and stars of BBC Three shows.

In recent months it signed a letter to the BBC Trust alongside 750 other members of the creative industry including stars of BBC television calling for the BBC to rethink. It organised a campaign for fans of the channel to write to the BBC Trust chair Rona Fairhead, and has helped coordinate fans of the channel to respond to the latest consultation. See more at www.savebbc3.com.