



## **Submission from the National Union of Journalists to Ofcom's Consultation on STV's request to change its regional programming commitments.**

3<sup>rd</sup> February 2026

### **Introduction to this submission.**

1. The National Union of Journalists (NUJ) is the voice for journalism and journalists in the UK and Ireland. It was founded in 1907 and has more than 22,000 members working in newspapers, news agencies, digital media, magazines, book publishing, public relations, photography, videography, and broadcasting.
2. The NUJ is one of the two recognised unions at STV News, together with our sister union Bectu. We have a close working relationship with the employer.
3. While the NUJ, like all unions, exists to protect and increase jobs, pay and terms and conditions, it also has a strong belief and commitment to journalism as a public good, that a strong independent media is the cornerstone of an informed democracy, and that local journalism in particular is of vital importance.
4. The provision of quality and trusted news is a cornerstone of democracy. At a time of polarisation, social media disinformation, AI-supercharged fake news, and corporate consolidation of media ownership, independent quality journalism is vital in promoting dialogue, democracy, and truth. This submission is guided by those principles.
5. The NUJ shares the objective that STV should be a modern, profitable company. We want it to succeed against the financial challenges in the general media landscape, arising from changing media consumption, more competition for audiences, and more choice elsewhere for advertisers.

6. The NUJ is not resistant to change within STV News, and neither are STV journalists, who have over many years adopted new ways of telling stories of their country and its communities to new audiences.
7. Our members at STV cover the entire range of the newsroom, from newsroom assistants to producers to some of the best-known names in Scottish media. Collectively, they have hundreds of years of knowledge and experience. Their work, talents, and skills have made STV News the success that it is. As was shown on our strike held on 7th January 2026, without them STV News cannot be produced on a day-to-day basis. The same is true of the technical staff represented by our sister union Bectu who work alongside them in the newsroom. This submission is informed by our members, their experience, and their knowledge.
8. STV's proposals are overwhelmingly opposed by its own journalists. In December, NUJ members voted overwhelmingly in favour of industrial action over the changes, with 94% in favour of strike and 98% for action short of strike on a turnout of 82%. Those journalists have so far held one day of strike action on 7 January 2026.
9. STV journalists have lost faith in the leadership of executive-level and senior-level management. In October 2025, NUJ members at STV passed a damning motion saying they "*have no confidence in the chief executive Rufus Radcliffe and his leadership team to continue to lead us in light of financial mismanagement and the failure and abandonment of the strategy refresh in May.*" They subsequently passed a further motion of no confidence in local management over their handling of the changes.
10. Our members have no belief that any credible plan for the changes in the newsroom exists other than the impetus to make severe and immediate financial cuts. They believe the proposals will result in worse news coverage for their communities in Scotland.
11. We note with dismay that Ofcom's provisional assessment is that the proposed changes "*will ensure audiences continue to be served with high-quality, regional news provision on a sustainable basis for STV*" and that in January 2026 Cristina Nicolotti Squires, Ofcom group director of broadcast and media, went further in describing the changes to the Scottish Parliament as "*the best thing for audiences across Scotland*".

12. It is unclear what the basis for this surprising statement is. It is not a view shared by the actual audiences referred to by Ofcom, whose interests it is supposed to represent. A poll carried out in November 2025 by True North Advisors showed 83% of those polled in the STV North area opposed the cuts to STV services, with just 4% in favour.
13. It is worth noting that Ofcom's provisional view is also not shared by STV News' own journalists, by business leaders, by the five main political parties in Scotland, or by the Scottish Government.
14. The NUJ is opposed to the stated proposals and urges Ofcom to reject them. We agree with other submissions to this consultation, most notably from the Scottish Government, that approving these proposals and weakening public sector broadcasting obligations is not in the interests of viewers in Scotland.

## Background to the proposed changes

15. The NUJ is sympathetic to the challenges most media organisations face, which are primarily the funding of journalism, and putting journalism where viewers, readers and listeners want to receive it. These changes in the consumption of news are not unique to STV nor to broadcasting. They exist at the BBC, at ITV, in newspapers, at online news operations, and in radio.
16. The NUJ has a history of working productively with other organisations in seeking to overcome these challenges. It is, however, important to separate those macroeconomic headwinds from short-term economic turbulence when significant and long-term decisions affecting public service broadcasting are to be made.
17. STV plc has framed the proposed changes to STV News as both necessary and urgent on the grounds that they need to adapt to producing news where audiences now want to consume news and do so on a sustainable basis. While we accept these changes in the media landscape exist, as described in *Transmission: Critical* and elsewhere, we do not accept that this is the true reason for the requests put to Ofcom, nor is this the reason for the urgency. We believe Ofcom has made a fundamental mistake in its framing of this consultation by taking STV's argument at face value.

18. This can be demonstrated by a review of the history and actions of STV prior to seeking this change.
19. In March 2024 STV signed a new ten-year channel 3 licence for STV Central and STV North, which came into effect at the start of 2025. While licences cannot be renegotiated at the point of renewal, there is no evidence to show that at any point in those talks that STV anticipated a change would be needed, either to adjust to changing media consumption, or because their operating model was financially unsustainable.
20. In fact the opposite was the case. STV agreed with confidence to new ten-year licences, and made a long-term commitment to meeting the licence terms for news provision while in full knowledge of the well-known general changes in media consumption. Announcing the renewal in March 2024, then Chief Executive Simon Pitts said the deal “[ensured] continued delivery of valued public service broadcasting on Channel 3 in Scotland until the end of 2034”.
21. STV's confidence remained bullish for the first half of 2025. In May 2025, STV Chief Operating Officer Lindsay Dixon described the company as a 'cash rich business' to investors. It announced the launch of a radio station. STV Chief Executive Rufus Radcliffe said, *“There is no ceiling to the international growth of STV Studios”*, one of the key drivers for company profitability. During this time, the company was investing £1.5m in upgrading the two STV News studios in Glasgow and Aberdeen.
22. STV's profits are driven principally from two sources: advertising on linear and VOD in its Audience division, and profits from its productions arm, STV Studios. Income from the first of these is linked to consumer and business confidence. It can change at short notice. It has recently fallen. The second is longer-term. Productions are booked significantly in advance. The company knows what revenue should be expected 12-18 months in advance. The value of that order book has fallen substantially. At the time of the Greenbird acquisition in July 2023, the order book stood at £70m. As of January 2026, the order book has more than halved at £33m. This has placed financial pressure on the business.
23. Despite this, in May 2025 it announced a new business strategy "STV FastFwd" aiming to more than double the revenue from its STV Studios division to £200m (up from £84m in 2023/2024).

24. There is no doubt that by May 2025 STV had strong confidence in its ability to meet and fund its licence obligations with regard to STV News under the existing model, even though it was fully aware of the changing trends in news consumption. If it had doubts at that point, it would not have made the investment in upgrading the news studios, particularly in Aberdeen. It could also have begun talks to request a change in its news provision from Ofcom at any point in that period. It did not.
25. In the next two months, STV's confidence as to its financial position changed. The change did not come about because of a sudden change in news media consumption. Instead, it was caused by two key linked events: a warning of lower-than-expected profits in July 2025, and a subsequent and immediate collapse of the share price. The company announced it would still be profitable but was expecting lower profits. Within two months of the profits warning the value of the company almost halved, with most of that collapse happening in a single day.
26. We believe STV did not anticipate the severe fall in the share price, and that consequently they immediately began planning cuts across the business, including to STV News, regardless of whether those cuts would allow it to meet its existing channel 3 obligations.
27. As of the time of writing, the share price has not recovered, nor is it expected to. If the proposed cuts were intended to give confidence to the financial markets, they have failed to do so.
28. In late September 2025, STV publicly announced cuts across the business, 60 proposed redundancies, half of which were in news, and that it would be seeking permission from Ofcom to vary the channel 3 licences.
29. We note that between the announcement in September 2025 and February 2026 STV has already placed staff at risk and redundancies have been made prior to Ofcom's decision. This speaks to the haste in which these proposals have been made.
30. Similarly, had this move been long anticipated, the company would not have spent a significant sum upgrading a newsroom in Aberdeen which will now be substantially mothballed months later.

31. It follows that the real and pressing reason for the request to change the operating licences at this time is not a long-term decline in audience habits, but a short-term drop in profitability, a collapse in the share price, and a knee jerk reaction at board level.
32. While the events detailed above are well known, it is understandably embarrassing to STV plc to frame their request in these terms. While we are sympathetic to the immediate financial predicament in which STV finds itself, we cannot accept its framing of its request. Any reduction in its public service broadcasting commitments needs to be considered carefully, as well as how it would extend to any similar requests from other channel 3 licence holders.
33. While there is an important debate to be had about long-term sustainable models of public service media across licence holders, that is bigger than and needs to be separated from the short-term financial problems of individual licence holders. Financial mismanagement in a single set of financial results cannot be the driving force for a reduction in public sector broadcasting (PSB) obligations.
34. To allow a reduction in PSB obligations because of a single set of poor financial results would incentivise commercial risk and mean that a drop in profits would be expected by licence-holders to be subsidised by cuts in local news coverage.
35. It is notable that while STV has framed the proposed cuts to STV News as inevitable, it has refused to make other commercial choices that could protect its PSB obligations.
36. For example, it made no changes in its plans to launch STV Radio, which required an investment of £500,000 in 2025, and is not expected to be profitable until 2027. It has sucked money out of the business at a time when the business can only afford it by reneging its existing PSB obligations. Our position is that it would not have been financially possible for STV to launch STV Radio at this stage without making cuts in the newsroom. In return, STV Radio contributes nothing to its channel 3 licence obligations, and virtually nothing to STV's news output.
37. The NUJ strongly agrees with the Scottish Government's submission when they state *"Decisions on new ventures, such as a new radio service, should not be made at the expense of vital public service conditions and obligations to Scottish audiences already set out in the licences"*.

38. If these changes are approved when profits fall, there is no realistic expectation of a scenario in which STV would return to Ofcom in profitable years and ask to restore or increase its news output. There is no incentive for it to do so. Instead, those increased profits will be returned to shareholder dividends and executive bonuses. This will then create a precedent for other channel 3 licence holders to reduce their PSB obligations. This is a ratchet which only lowers investment and commitment in news and has the potential to degrade news output across all the nations and regions. If quality public service broadcasting is to be maintained, it must be resisted.
39. In conclusion, the NUJ believes Ofcom should reject STV's proposed changes.
40. There is a wider industry consideration, which the NUJ raised in evidence to the Scottish Parliament's Constitution, Europe, External Affairs and Culture Committee in January 2026. Since these cuts were announced, in November 2025 ITV confirmed it was in talks over a possible sale of its broadcasting arm to Sky's owner, Comcast in a £1.6bn deal. This would represent one of the largest shake-ups in the UK broadcasting industry, and were it to be approved, it is plausible Comcast would then seek to purchase STV as the owner of the remaining two channel 3 licences. The cost of doing so would be in the region of £50m, half the value it was a year ago - or an additional 3% on the ITV purchase price.
41. On January 26<sup>th</sup>, 2026, STV CEO Rufus Radcliffe confirmed that STV was "*exploring the strategic options that are emerging given the rapidly evolving media landscape*", in what we believe is a clear reference to talks between STV/Comcast around such a take-over.
42. Given that the NUJ believes that the ITV/Comcast talks are at a much more advanced stage than has been made public, and that a potential deal could happen as soon as Q2 2026, it would leave Ofcom in a difficult situation were it to reduce public service broadcasting obligations to alleviate financial pressures on STV, only to find it had added to the profits of the new owner: an already profitable US-owned \$32bn media giant who could well afford the current model of news delivery.

### **Where STV currently sits in the Scottish media landscape**

43. STV is one of the best-known media brands in Scotland. STV News, together with its presenters and reporters, is the public face of that brand. It is a significant media employer in Scotland, employing around 150 prior to the current cuts. STV is Scotland's most-watched commercial channel, frequently outperforming BBC One in Scotland. The two flagship editions of the STV News at Six have historically outperformed all BBC Scotland news programmes, with the STV North edition being the more successful of the two.
44. 79% of viewers in Scotland say they are satisfied with STV, slightly below Channel 4 (81%) but above BBC One (76%) Channel 5 (75%) or the BBC Scotland channel. 70% of viewers in Scotland say they are satisfied with STV Player, more than ITV X.
45. Viewers in Scotland want to follow Scottish news, with only 3% saying they do not. This compares to an equivalent 12% in England who say they do not want to follow news about their country. STV/ITV1 is the most used way those in Scotland access news about Scotland, with 27% of people using them, ahead of BBC One (22%), Facebook (17%) and the BBC News website or app (11%).
46. STV News's two editions of the News at 6 have allowed it to successfully compete against BBC Scotland's better funded and high quality 1830 Reporting Scotland programme. It adds choice for viewers and encourages competition.
47. STV is often an introduction to broadcast journalism for many early career journalists, who may stay with STV, or move to other broadcasters, such as ITV Border, BBC, or BBC Scotland. The media landscape is enriched by STV. It has launched the careers of, among others, Kirsty Young (who moved to Channel 5 News), Lorraine Kelly, Arthur Montford, Jim White, Martin Geissler and Sally Magnusson. A significant number of journalists in Scotland have worked at STV at some point in their career.
48. STV North has provided a strong route into journalism for students in the north and north-east of Scotland, notably through Robert Gordon University, providing equality of opportunity for prospective journalists from throughout Scotland, and not just for those in the Central belt.

49. Any move of editorial control away from Aberdeen and Dundee would not just affect viewers who depend on quality local news – but also reduce opportunities for young and early-career journalists in north and north-east Scotland. Apart from creating a geographical imbalance, it would disproportionately affect those prospective journalists from less affluent backgrounds, who would be disproportionately unable to afford to move to Glasgow or Edinburgh to study journalism.
50. If the proposed changes are allowed, it will cause long-term damage to journalism across Scotland, and the ability of local journalism to inform voters and local communities.

**Do you agree with Ofcom's provisional assessment and its proposal to amend STV's licence conditions to allow for:**

- Sharing of up to 70% of material in the news programme broadcast at 6pm each weekday (the STV News at Six) between the STV North and STV Central licences; and**
- An extension of the permission to fully share programming currently restricted to the weekend to news programming broadcast outside of peak hours and on bank holidays?**
- If not, please explain why, providing supporting evidence where possible.**

51. As a starting point, we agree with Ofcom that STV “*must continue to provide a high-quality linear news offering that is relevant to audiences across both its licensed areas.*”
52. The NUJ is opposed to these proposed changes to the licence on the basis that it will adversely affect viewers and reduce valuable local coverage which local communities value and rely on.
53. STV News across all platforms and times is a Scottish media success story in a competitive media landscape. The two editions of the News at 6 outperform the 1830 Reporting Scotland, and frequently are the most watched programme on linear television in the evening. This complements the media output from other channels and adds choice to viewers and consumers.
54. This success is a tribute to the talented and dedicated journalists in the newsroom, and to the current operating model.

55. We note and welcome STV's commitment to maintain journalists at its regional bases in Edinburgh, Dundee, Holyrood, Aberdeen, Inverness, and Westminster. We note, however, that BBC Scotland News operates across twice as many geographical bases although it produces a much wider output. We also note that STV has recently relocated and reduced the physical size of its Edinburgh and Dundee offices, and that only a small number of staff are based in Inverness. However, it is undeniable that going forward there will be fewer journalists producing less news, and we fear the deprioritising of Aberdeen as a production base makes it more likely staff at Aberdeen and Dundee may be seen as more dispensable in the future.

56. STV News at Six North covers a wide range of areas relevant to local audiences including the energy sector, fishing, farming, and tourism. These industries would not receive the same level of coverage and scrutiny in a single programme. It covers the largest land mass of any broadcast region in the UK, from Shetland to North Fife, the Western Isles to Aberdeenshire. It is part of the fabric of society across a huge swathe of the country, giving a crucial voice to rural areas, the elderly, people living in poverty, ethnic minorities, gender organisations and diversity groups.

57. We want to protect local journalism for the people in these diverse communities who do not have access to digital services.

58. We note STV's assertion that "*this long-term investment in digital gives us confidence that we can successfully transition our newsrooms to a content led, multiplatform future*". This is hardly a new initiative. For example, in 2012 STV was telling advertisers "*Gone are the days when STV's content was viewed solely via the number 3 button on the TV remote. Not only do viewers now watch their favourite STV programmes when it suits them but they increasingly view them on an array of platforms and simultaneously enjoy multiple media experiences, particularly online, whilst viewing television.*" We also note that of the five-strong digital team, three roles have already been closed in the recent round of redundancies. This does not give us confidence that this ambition is anything new, nor that there is a genuine and well thought through plan to increase online output.

59. A quota of 30% for local news for each licence area represents a significant drop in the current programming. A typical edition of the News at 6 is around 27:30 long. Around 2:30 of that programme will be the programme furniture: titles, studio introduction and goodbye, and brief sponsorship adverts. That leaves 25:00 of news, sport, and weather. Under the current proposals, 30% of the news would be local to one or other licence areas – this would be, on average, 7:30 local content, with 17:30 of shared content.

60. However, our survey of the current output of the STV North News at 6 (Aberdeen) showed that there was around 10:00m of dedicated stories from the North, 4:55 of sport from the North, and 2:00 of weather from the north, amounting to around 17:30 of dedicated content – twice as much as is proposed in future.

61. To put it another way: to take one day as an example: on 2 February 2026, the STV North (Aberdeen) edition could have met its proposed new quota by just broadcasting sport and weather, and not broadcasting the four local-interest stories to the North licence area about the start of the salmon fishing season, farming, weather warnings for snow in the North, and north sea fishing – all of which are culturally or economically specific to the north and north-east, and which would not be broadcast elsewhere.

62. STV's revised request states: "*Our current newsroom model is built around the primacy of our news programmes at six o'clock. Editorial decisions including story choice, resource deployment and deadlines are primarily influenced by our broadcast output and this material then flows down to our digital platforms.*" Despite their stated ambitions to move beyond this, it is difficult to see how this would change under a future model.

63. Regardless of the newsroom structure, the News at 6 will remain. If the STV website has one or two fewer stories on a particular day, that is not noticed except by the most observant news consumer. However, the News at 6 cannot go out with fewer stories without having dead air and having enough broadcast news stories to fill that programme takes significant planning, shooting, and editing from the start of the day. STV's website and social media output do not add to its licence conditions, whereas the channel 3 licence obligations are strict. It is hard to see how, under such circumstances, day-to-day allocation of resources will not inevitably still be prioritised around the News at 6.

64. Since under all proposals, the version of the News at 6 seen in the north will have been presented and produced from Glasgow, it follows that key editorial decisions about the content of that programme will be taken by those in Glasgow, and is likely to reflect the biases of the central belt with regard to story choice and resource allocation.
65. In this example, we are not persuaded under the new proposals that all or any of the four north-specific stories listed above in point 61 would have subsequently been commissioned for online or social media use instead. These would be stories which simply would not have been recorded. This is a loss of valuable journalism to local communities.
66. For all the reasons above, the 30% quota for local news is an insufficient safeguard to protect the distinctiveness of relevant, local stories for communities outside the central belt.
67. In addition, the ability of the two editions of the News at 6 to set their own news agenda allows significant flexibility for a local angle. The same pre-recorded story can be treated differently by the two newsrooms, with a journalist being in the studio talking to the presenter, or local vox-pop. In a future where all STV North specific stories are pre-recorded and presented from Glasgow, there is no prospect of updates being made to the story while on air to reflect developing news, or for a journalist based in Aberdeen to sit in the studio with the presenter to discuss, or any similar local angle being added to a national story as happens at present.
68. The type of stories that are likely to develop around the time of transmission are some of those that generate the most viewer interest, such as jury verdicts in court cases, or breaking political developments. We believe this will lead to editorial decisions away from those types of stories, and towards more magazine or feature pieces, to the detriment of viewers.

**Do you agree with Ofcom's provisional assessment and its proposal to remove the obligations in the STV North and Central licences for STV to broadcast 5-minute sub-regional bulletins ('opts') as part of the weekday 6pm news programmes? If not, please explain why, providing appropriate supporting evidence where possible.**

69. STV currently meets its licence obligation for five minute opts for each of the four sub-regions by typically splitting that into around 3:30mins of specific news, and around 1:30mins of local weather. It is not clear whether the inclusion of weather within the five minutes was intended when the licence was drafted.
70. The opts typically appear in the middle of the programme, and the presentation is seamless within the programme. Under existing arrangements some circumstances the same story (or versions of it) can appear in more than one opt. For example, a story affecting Fife may be run in both the Dundee and the Edinburgh opt.
71. Taking all of the above into account, and that the production cost of 1:30min of weather is significantly less than the equivalent news programme, our position is that the benefits to local communities in the STV North (South) sub-region and the STV Central (East) sub-region of the opts are significant. The need for stories in those areas also increases the chance of journalists developing other contacts and leads for other local stories which can be run across the main programmes. We believe the opts not just increase representation and quality local news but also protect a drift towards selecting only stories aimed at a central-belt or Glasgow bias.

**Do you have any comments on the impact assessments underpinning our proposals as set out in Annex 2?**

72. We cannot agree with Ofcom's conclusions that the proposed changes will have no impact on audiences. We note that in all cases Ofcom's conclusions depend on the premise that audiences will "receive the same quantity of high-quality regional news". As we conclude above, the 30% quota for local news is an insufficient safeguard to protect the distinctiveness of stories for communities outside the central belt. Our calculations in paragraph 61 suggest that the amount of local news coverage will fall dramatically – from around 17:30mins presently to just 7:30mins under the proposal. Against these figures, Ofcom's conclusion in A2.15 that the impact on local and relevant news coverage will be neutral is inexplicable.

73. We do not agree that the proposal will have a positive impact on competition. On linear, the immediate competition is the evening edition of BBC Scotland Reporting Scotland. That is a single programme across Scotland. Under the proposals, STV News would be offering little different.

74. In regard to competition online, STV is already in a strong position. For news on its website, it has a clean design, a mix of original and Press Association stories, and is free to use. None of the proposals will change those fundamentals. Its immediate competition in the North and North East would be websites by Highland News and Media (eg Inverness Courier) and DC Thomson (The Press and Journal, The Courier) which are paywalled. The proposal does not change that for better or for worse.

75. STV's revised request notes, in relation to digital exclusion: "*levels of internet access in Scotland have reached 91% of all households*". It does not follow from this that there is always corresponding access to online news. For viewers in older age groups, access to the internet does not correspond to owning a digital-ready television, equate to being able to access VOD or news via social media, or necessarily a desire to do so.

76. For those who want to switch from watching news on linear television to VOD, the current STV Player is not user-friendly, and this difficulty will be worse for disabled users or those of advanced age. STV News first appears 20 rows down on the home screen, and then only for individual stories. The full programmes appear only on row 22, after clicking on "News and Current Affairs", which does not carry any recognisable STV News branding. The alternative is to search by name, which is notoriously user-unfriendly to type when using a television remote.

77. A preference for viewing news on linear television can be connected to accessibility (for eyesight issues, or a television remote being easier to handle than a touchscreen or keyboard). It can also represent a preference for a fixed daily routine in retirement. Their audience enjoy seeing local news at a regular time each day in a format that suits them.

## Summary

78. The NUJ opposes all the changes proposed by STV.
79. At a time when the BBC's Charter is being renewed and the UK government is working on its Local Media strategy there is an opportunity to consider sustainable support for commercial public service broadcasters, and crucially local news, in the round. There must be a bold commitment from governments to invest and strengthen public service broadcasting, working with stakeholders to achieve this. The NUJ has produced its News Recovery Plan which advocates Ofcom raising minimum level local news output provisions.
80. STV News, and its current news format of the News at 6 programmes, is a Scottish media success story outperforming strong competition. It should be celebrated.
81. That success is built on its commitment to local news and local presenting, which is a driver for increased local viewership and advertising sales to local businesses. The current format of having two News at 6 programmes each with an opt is a winning formula.
82. We acknowledge the change in media consumption and changing industry conditions and the challenge it presents to public service broadcasters, as shown in Ofcom research going back at least 15 years.
83. However, the immediate driving force for the need for savings is unique to STV, and their short-term financial position. This is not the position for which to consider far-reaching changes and reduction in public service broadcasting obligations.
84. When STV has been faced with a choice whether to make cuts elsewhere, or to choose to reduce the journalism it produces, it has chosen the latter. This is evidenced by their decision to go ahead with the launch of STV Radio, a launch which is only currently affordable by cutting jobs in the newsroom.

85. We invite Ofcom to treat STV's stated ambition to move to increased digital output with scepticism. This has been a stated aim of the company for at least the last decade, We believe the only driving force is to reduce costs, rather than finding new ways to connect with audiences. Investment, rather than cuts, is the only way to address these issues for the longer term.
86. While the audience for linear television is declining, the current audience is a significant demographic who enjoy and depend upon getting their news from linear and who are less likely to switch to other digital formats.
87. The position STV finds itself in could rapidly change – either through increased advertising, or a takeover by Comcast as an extension of the proposed ITV takeover – and that could happen within 2026.
88. We invite Ofcom to take into account the unprecedented outrage at the plans from viewers, business leaders, politicians, the Scottish Government, the unions and STV's own journalists, and to reject these proposals, and work with STV and all stakeholders to find a way forward that preserves the quality local journalism that informs, entertains, and educates viewers.