



5th December 2011

Dear Pip,

### **Meeting of POA on 4<sup>th</sup> November 2011**

Further to our recent conversation we have had a second meeting of the POA. As you are aware the aims of the group are to:

1. Improve safety on the middle river
2. Improve navigation on the middle river
3. Liaise with the Cam Conservators on matters related to commercial operators

At this particular meeting we discussed a number of points that included:

- the suggestion that we adopt a hackney style number plate and punt liveries
- the new Cam Conservancy rules for the registration of commercial craft
- the current Code of Practice for commercial operators

In this context we would like to make the following comments on these points:

#### **Hackney style plates and punt liveries**

There was little support for these measures from the different members of the group. Regarding livery, this is something that CCP, Granta, Scudamore's and the colleges have already adopted unilaterally, but some of the smaller independent businesses would be reluctant to take on a corporate look. Regarding the hackney style plates, it was felt that consideration of this should be postponed until after the new measures regarding the registration of commercial punts had come fully into force in 2012. However, it was felt that it would be useful if the registration number prefix for craft easily identified the company or punt station that the craft was based at (please see our comments regarding Clause 8 of the COP below for further details).

#### **New rules for commercial punt licensing**

We are concerned that the current wording as passed at the last Cam Conservators' meeting, might be too open to interpretation, allowing the intent of the new rules to be circumvented. Indeed, we have heard that at least one of the Garret Hostel Bridge operators believe they can easily get around the current wording by exploiting perceived loopholes.

We therefore feel that it would be prudent to support the intent of the new rules by formally establishing the following within the regulations themselves:

- The point made in your letter to commercial punt operators (dated 12 October 2011) that craft other than punts are covered by the rules, as are both self-hire and chauffeured craft.
- That 'commercial' refers to the range of activities covered by the ownership categories for registration.
- The fact that the Conservancy's decision is final as to what constitutes a legitimate owner or occupier of land for the purposes of granting permission for its use as a hire station. Where the owner or occupier of land cannot be established, permission will not be deemed to have been granted to use that land as a hire station.
- The exact location of the 6 recognised hire stations with reference to a plan of the river.

This would yield regulations with wording along the following lines:

From 1<sup>st</sup> April 2012, applicants (owners or operators) seeking to register commercial chauffeured or self-hire boats (i.e. punts or other river craft), must be able to satisfy two criteria to meet the Conservators' registration requirements:

1. The boats to be used must be registered to and operated from an officially recognised boat operating station.

Six locations only will be regarded as recognised operating stations for the purposes of registering boats for hire to the public at the present time. They are as follows (please also refer to the attached plan of the College Backs on which the locations of these stations are marked in pink):

Granta Mill Pond  
Mill Pit west  
Mill Pit east  
Trinity College frontage  
Quayside  
La Mimosa

AND

2. The applicant must be able to provide evidence that he or she has the permission of the land owner or occupier to use that boat operating station.

Please note that the Conservators' decision is final as to what constitutes a legitimate owner or occupier of land for the purposes of granting permission. Where the owner or occupier of land cannot be established, permission will not be deemed to have been granted to use that land as a boat operating station.

For the avoidance of doubt, all craft falling into ownership Categories 4 – 6 (as defined by the Conservators) are considered to be commercial for the purposes of registration.

We would also like to suggest that the Conservators consider the creation of a list of pre-authorized operators consisting of Scudamore's Punting Co, Granta Punts, Cambridge Chauffeur Punts, Trinity College Punts and those individuals/companies that have been licensed to operate at La Mimosa by CCC. We believe that it would then be a reasonable requirement that the Conservators only allow pre-authorized operators an automatic right to apply for a commercial licence to operate craft on the Middle River.

To become a pre-authorized operator other individuals and/or companies would then have to apply in advance to the Conservators outlining how they intended to operate, the type of craft they would use and the location of their operation. It would then be at the Conservators' discretion to consider the application and decide whether to add the applicant to the pre-authorized operators list. In this way it would be possible to ensure that the intent of the new rule was maintained via a formalised vetting process.

In essence, it would be similar to the situation where the Conservators considered whether they wanted electric craft on the upper river in advance of the operation starting. The important point is that there would be no automatic or immediate requirement for the Cam Conservancy to issue a commercial licence to any craft that was not owned/operated by an operator on the pre-authorized list.

### **Code of Practice for commercial punt operators**

The policy was reviewed and we had the following suggestions/comments on the Cam Conservators 'COP for Commercial Punt Operators'.

The name should be changed to Commercial Boat Operators (not just punt) and references to punts should be replaced with either the word 'craft' or 'unpowered craft', except where punts are specifically referred to (e.g. signage). Regarding the numbered clauses we feel that:-

- Clause 4 – the final sentence 'and procedures to be implemented in the event that a punt fails to return to its station' is not relevant and should be deleted.
- Clause 6 – this statement should apply ONLY to the times of year when the river is also open to powered craft.

- Clause 8 – the proposed signage in Appendix A is too large (200 x 150), as there will be 3 such signs per punt and that they should be reduced to a much smaller size. On the subject of the numbering of craft, at A4 of the Appendix it was suggested that different punt stations apply different prefixes to their registration number. For example Scudamores (SC), Granta Punts (GRANTA) and Cambridge Chauffeur Punts (CCP). Trinity College Punts and La Mimosa operators could be asked to provide suggested prefixes that could be used by all craft from that punts station.
- Clause 10 – the addition of ‘or as soon as the operator becomes aware of it’ would be helpful after ‘within 72 hours of that accident having taken place’.
- Clause 11 – this should be deleted as it is something the Conservators may/can do, not the commercial operator.
- Clause 15 – for the sake of consistency, the word ‘skipper’ in last line should be replaced with chauffeur.
- Clause 16 – the ‘right hand arch’ is unclear with reference to the three 3 arch bridges (Clare, Trinity and Kitchen), as the current implication is that the centre arches should not be used, which was presumably not the original intention! It would be preferable if ‘the right hand arch of all bridges’ could be replaced by ‘the right hand side of all bridges’ to allow the right hand side of each centre arch to be used at the 3 arch bridges. In each case the central arch tends to be much the most straightforward to use (the main issues encountered moving downriver are as follows: the left hand arch of Clare Bridge is often blocked by moored punts; the left hand arch of Trinity Bridge is difficult to navigate as it is on a bend and the right hand arch has restricted visibility because of an overhanging willow tree; the right hand arch of the Kitchen Bridge is difficult to navigate as the wall of Third Court hips out into the channel just downriver of the bridge, creating a sharp turn and a concrete skirt extends into the water at this point, making pole placement difficult).
- Clause 17 – the word ‘fully’ should be deleted as this requirement is not practicable.
- Clause 20 – the addition of ‘and themselves’ would be helpful after ‘the safety of their own passengers’.
- Clause 21 – this appears to be contradicted by the Conservators licensing a self-hire ferry to Gonville & Caius College (the COP applies to Category 4 owners). If Caius are to be allowed to continue to licence this ferry Granta Punts feel that they should be allowed to let out self-hire ferries from time to time.
- Clause 23 – similar comments apply re 3 arch bridges as at Clause 16 above.

We hope this letter is of assistance and look forward to hearing from you in due course.

Best regards

James Macnaghten  
Scudamore’s Punting Co Ltd

Sent on behalf of the POA