

## **Appendix C: PSPO (Touting) 2016 – Responses**

### **City Councillor**

“The PSPO has made a difference, and the legal action at Garret Hostel Lane then had a major impact. So I support continuing it, including as it pressures other operators on the river not to be tempted, particularly as we make observance a condition on leases.”

### **City Councillor**

“It seems to me that the Order should be extended for at least three years as a short term measure. Beyond September 2022 we shall need something much stronger in place since the projected growth of casual tourism in the coming years suggests the touting phenomenon will become even more of a nuisance by then.”

### **City Councillor**

“I believe that this PSPO has had a strong positive impact on the problem of punt touting in the areas it covers. However there are continuing reports of occasional touting within the area some of them relating to touts offering punting under the initial guise of offering walking tours. It seems clear that the PSPO must be renewed to ensure that we do not revert to the intrusive and sometimes bullying interactions by punt touts. I would be interested to know if there have been complaints of punt touting in areas not covered by the existing PSPO. If that is the case then consideration should be given to extending the area covered. Please let me know.”

### **City Councillor**

“I fully support the extension of this PSPO.”

### **City Councillor**

“I support the extension of the PSPO for touting.”

### **City Councillor**

“... just to say that I am in favour of maintaining the ban on verbal touting, especially on Kings Parade and at the railway station.”

### **City Councillor**

“I am happy for the PSPO to be extended for another 3 years.”

### **Police and Crime Commissioner**

“I refer to your email dated 3rd May to myself, Cambridgeshire Police and Crime Commissioner, regarding Cambridge City Council's proposals for the extension of the existing 2016 Public Space Protection Order (PSPO's) around Cambridge City Centre. I both welcome and thank Cambridge City Council for undertaking the consultation to seek the views of the public and myself, as Cambridgeshire Police and Crime Commissioner, in response to extending the existing PSPO to prohibit verbally, punt touting and tours in and

around Cambridge City Centre. This letter is my formal consultation response to both of the proposed PSPOs. To inform my response I have considered the views of Cambridgeshire Constabulary's Local Policing Team regarding the area relating to the proposed PSPO. The constabulary have not had any issues with the punt touts as this is led by the City Council officers, occasionally supported, as and when necessary, by police officers. In conclusion I fully support Cambridge City Councils proposal for an extension to the existing PSPO in order to prevent verbally; soliciting, advertising and touting for punt tour or punt hire."

### **Local Police**

"I confirm that following consultation with my senior officer team we have no objections to your proposal."

### **Visitor Information Centre**

"I am writing with regard to the review of the PSPO ... I believe that letting the order lapse would be a mistake and would lead to a large increase in the number of touts both in the city centre and the routes leading from the rail station to the city centre. Although the ban is still in force, punt tickets are regularly sold by touts along King's Parade and further work should be done to stop this practice rather than removing one of the tools to prevent it. The injunction at Garret Hostel Lane removed a large number of touts from the city centre but the emergence of touting for walking tours will see an increase in touting over the summer months. I have read the response from ... the Society of Cambridge Tourist Guides, and fully endorse the points ... raises. The issue of touting for walking tours on King's Parade affects visitors and residents to the city centre in two ways; there is the annoyance of touting (including aggressive touting) and the added issue of untrained guides leading very large groups in the city centre which impacts on the experience of visitors and locals alike. For these reasons I believe that the PSPO should be amended to include all touting in the city centre."

### **Visitor Information Centre**

"I think the only thing that I wanted to say, is that while the situation is definitely better - a significant reduction in aggressive touting particularly outside Great St Mary's/Senate House, many residents still feel that there is touting going on and it presents the city in a poor light. I think that most people in Cambridge do not distinguish between punt touting and walking tour touting, which still goes on. If I tell them that there has been a huge improvement due to an injunction against punt touting, but that it doesn't cover walking tour touting they find it laughable - ie it doesn't address the fundamental problem of touting on the streets of Cambridge. People often say it is something they would expect to see in the third world, not Cambridge. I strongly suspect there is nothing you can really do about this. But I would be missing an opportunity if I did not remind the council to think about the overall, real problem, not the legal niceties."

### **Cambridge BID**

"Cambridge BID would overwhelmingly support the extension to this PSPO and if possible widen the area since we still receive reports of punt touts being active in some parts of the city, despite this PSPO and the subsequent high court injunction from last year that

restricted access to the river. This would be mainly at the Rail station outside the Microsoft building. It would also be good to have the PSPO amended so that even the visible non verbal promotion of unlicensed punt tours or walking tours is an offence, namely using a pop up stand, or bicycle based promotion, or carrying a placard or other such materials. As a global heritage city it is imperative that visitors to the city are given a welcome and receive products and services that are professional, regulated and safe and that they are able to enjoy the city whilst not being harassed by touts, who we know in the past often represented businesses who were not insured or regulated. The High Court injunction from May 2018 has clearly had the main effect but we must not relent on this and the city needs to remain proactive. I have many anecdotal reports from businesses and visitors now as to how much more pleasant their experience of walking along Kings Parade, or Regent Street now is and we need to keep up the good work as a city to ensure the small number of touts who remain are discouraged. Despite the high court injunction, if this PSPO was not extended it would send the wrong signal to the touts and encourage them to seek to find loopholes so they can continue to operate.”

### **Cambridge Business Against Crime**

“CAMBAC very much supports the proposal to extend the existing Punt Tout PSPO. We feel it has had a positive impact on the issue and this is echoed by our businesses.”

### **Society of Cambridge Tourist Guides**

“I write to give evidence to the committee which considers the renewal or extension of the ban on touting in Cambridge City Centre. ... the Society of Cambridge Tourist Guides (SCTG) ... works closely with Visit Cambridge and Beyond and represents 140 green and blue badge guides who conduct official guided walking tours in Cambridge. Our guides are accredited by the Institute of Tour Guides, have spent a year studying to gain their qualification in Cambridge, abide by a code of conduct and work hard to improve the experience of visitors to Cambridge and conduct our tours with respect for the local environment and for those who live and work in the City. We see at first hand the aggressive practices of touts who continue to sell punting tickets in central Cambridge. Because the Order does not cover touting for walking tours, some touts have turned their attention to walking tours and are finding this an equally lucrative occupation. We are now entering the peak season for tourism in Cambridge and already the touts are making the lives of residents and visitors a misery. It is essential that the PSPO is extended beyond September of this year. The problem of aggressive punt touting has not gone away and if the Order is allowed to lapse we are convinced that the problem will rapidly grow even beyond the levels which led to the PSPO in the first place. We know that touts can earn up to £400 per day and typically take a 50% commission on sales made to gullible visitors. They then use untrained guides who do not know how to manage large groups and cause obstructions and nuisance as a result. Furthermore we are of the view that the aggressive touting problem, which very much exists in Cambridge, will continue to make walking in the centre of Cambridge an unpleasant experience as people are accosted every few yards by touts. We believe the Order now needs to be extended to cover touting for walking tours as

well as punting. In addition we would like to point out the kind of problems which untrained unofficial guided tours create for people in the City Centre:

- Tour groups are frequently too large to be managed;
- Unofficial guides frequently cause obstructions with their groups. This causes pedestrians to be forced into the road to get past groups blocking pavements.
- Unofficial guides block roads and endanger their customer and pedestrians and cyclists by blocking roads.

I attach some photographic evidence to show how unofficial guides which the touts employ are endangering the public and causing a public nuisance. I would add that official green and blue badge guides are trained not to block pavements and to ensure that pedestrians and cyclists are not obstructed. We also do not lead groups larger than 20. We carry public liability insurance. We are the only guides allowed inside colleges and so frequently take groups of tourists off the streets so that there is more room for other members of the public. And, of course, we abide by a code of conduct and do not sell tickets on the street. We urge you to renew the PSPO and to extend it to cover walking tours. Tourism in Cambridge needs to be managed in order to give visitors a high quality experience and to preserve the local environment for the benefit of all. Official, trained and qualified guides are part of the solution and face unfair competition from the unofficial guides and their touts. We urge you to take appropriate action to ensure the touting problem is reduced and does not increase.

### **Tourist Guide**

“From my perspective as a guide the current order has been an unqualified success. The absence of punting touts has meant less congestion on the streets at certain pinch points such as outside of Kings, the Corpus Clock and Emmanuel. In addition the “roving” touts no longer interrupt groups when walking or when they are stationary listening to a presentation. It could be better as some touts still exist outside St Mary’s and King’s purportedly giving information or selling walking tours. This is very much a ruse to selling punting. However the reduction has led to a safer environment, with particular reference to King’s Parade and Garret Hostel. From my perspective as a ... resident and echoing the views of neighbours it is the same story and Cambridge is a more pleasant place to visit. There are a number of issues including the sheer volume of visitors coupled with the size of tour groups that could do with being addressed but the introduction of the PSPO has undoubtedly helped matters. On a different note has any risk assessment taken place with regards to a potential terrorist attack. It has been mentioned that King’s Parade would be a prime location should anyone feel so minded.”

### **Local Church**

“We find touting a great concern to our visitors and staff who can feel threatened and hectorred by the touts. We would request that the existing order is made permanent and rigorously enforced. It should also include any form of touting not just punting as those touting for other tours can be just as much a nuisance.”

**Local Trader**

“For a limited period after the order was passed in 2015 Kings Parade was a much better environment for tourists and the public to circulate in, freely. In practice the council’s team to pursue enforcement seemed to lack teeth and very quickly the situation reverted to what we had pre-2015. I would suggest that the order is worthwhile, to enhance the experience of visitors coming to Cambridge, if policed. It clearly needs to be enforced if it is considered to be helpful and worth renewing – what happens today is not an example of how it works in practice, it has little value.”

**Local Trader**

“Touting remains rife, the measures that have been put into effect seem to be generally ignored - I still regularly see touting along King’s Parade, around the train station and Petty Curie. Whenever there is an initiative to crack down on them, they simply move up the road to where there are no restrictions – outside the Tamburlaine, around Christ’s Lane etc. I do think the order should be extended to protect local businesses but it will only be effective if the order covers the whole town centre. The flip-side of the argument is: What more could be done to ensure that the registered punting companies are front and centre for visitors to Cambridge? I rarely see anything that gives me any indication of where to start looking for punting venues. The only signs that this exists in the town centre are on the boards that the touters are holding aloft. As far as visitors to Cambridge are concerned, the touters make it easy for them which is why they’re so successful and why there’s so many of them.”

**Local Trader**

“I would like to offer a brief note in support of extending the PSPO which restricts the amount of punt touts in the city centre. Since this order has been in force the area immediately outside my shop and around Great St Mary’s has been much improved. Whilst there continues to be some activity, it now seems to have struck a reasonable balance and my observation is that visitors to the city no longer feel quite so harassed by the touts. It is also far better for those of us working in the immediate vicinity. I would be very concerned if this order was not renewed and see its success to date to be sufficient reason alone to extend it further.”

**Local Trader**

“It worked probably for 1 week and then the punting touters were touting again. Nothing changed!”

**Local Trader**

“We would like to voice our support against touting in public places in Cambridge. We understand that you are consulting on this at the moment. The touts cause loads of disruption to customers who are already hassled by our homeless community. Quite apart from the fact that they don’t pay tax! If the streets are a free for all we will set up a stall outside!!”

### **Clare College**

“Clare College would support a proposal to extend the Public Spaces Protection Order (Touting) 2016. Furthermore, it would support a proposal to include prohibition of non-verbal touting eg advertising and/or display of advertising. Clare College has suffered from anti-social behaviour as a result of illegal punt touts particularly along its river bank. This has included littering; noise; verbal abuse and threat of physical abuse towards its members, visitors, and members of the public; excessive drinking of alcohol; use of drugs; urinating in the College’s Gardens; and mooring along both the front of the Gardens and in the culvert next to Garret Hostel Bridge. The PSPO and the enforcement as a result of the PSPO has had a positive effect on reducing this anti-social behaviour by removing punt touts from the area. Extending the PSPO would be in the interests of Cambridge, its residents, its workers, and its visitors to provide a safe and welcome environment for everyone. If the PSPO was allowed to lapse then the number of punt touts would inevitably increase as would the cost and time required by Cambridge City Council to manage their anti-social behaviour.”

### **Trinity Hall**

“Trinity Hall would overwhelmingly support the extension to this PSPO and, if possible, would recommend further measures to include visible non-verbal promotion of unlicensed punt tours or walking tours as an offence, namely using a pop up stand or bicycle-based promotion, carrying a placard or other such materials. Trinity Hall has seen a marked improvement to Garret Hostel Lane since the PSPO and an even greater one since the High Court injunction of May 2018. The City needs to remain proactive as, although these measure have improved the spaces of Garret Hostel Lane and King’s Parade, to let the PSPO lapse will send the wrong message to touts and allow them to manipulate loop-holes to continue to operate their illegal business.”

### **Gonville and Caius College**

“Gonville and Caius would strongly support the extension to this PSPO. Like Trinity Hall we would support an extension to include signage based promotion of unlicensed punt tours or walking tours as an offence, namely using a pop up stand, or bicycle based promotion, or carrying a placard or other such materials. Gonville and Caius has seen a marked improvement to Garret Hostel Lane since the PSPO and especially the High Court injunction (May 18). Our students have no other route to cross the river from our Old Courts back to our first year accommodation late at night, the anti social use of this area worried many of them. Letting the PSPO lapse would be disastrous in giving the illegal touts an opportunity to exploit loopholes and again bring anti social behaviour into these narrow lanes in the heart of the City and alongside one of its prettier and more peaceful river crossing areas. The City must, please, remain proactive against this.”

### **St. John’s College**

“St John’s College would strongly support a proposal to extend the Public Spaces Protection Order (Touting) 2016. Furthermore, it would support a proposal to include prohibition of non-verbal touting and promotion of unlicensed punt tours or walking tours, including the unregulated use of pop up stands, bicycle based promotion or carrying a

placard. The PSPO has had a positive effect in reducing anti-social behaviour both on and off the River Cam and extending it would be essential in continuing to ensure that Cambridge is an attractive destination for visitors. As well, it would serve the interests of residents, workers and those seeking to conduct legitimate tourist related businesses in the area. To let the PSPO lapse would send the wrong message to touts and encourage unregulated exploitation of visitors and the growth of ill-informed tour guides in the City at a time when we understand the City Council to be seeking exactly the opposite.”

### **Emmanuel College**

“I most heartily ask that the PSPO is continued. The touts are a real nuisance and block the pavements. They push the boundary of the current order outside Emmanuel College where I work and block the pavement near a very busy and dangerous junction so people have to walk on the road to get past them when they stop pedestrians.”

### **King’s College**

“Thank you for your message and opportunity to reply – this comes on behalf of King’s College [and] the College’s Bursar’s Tourism Sub Committee. I am aware that a number of Colleges have already responded to your calling message, and I endorse their comments. King’s is most strongly supportive of a proposal to extend the PSPO (Touting) 2016. It is of note that since its introduction in 2016 there continues to be a presence of touts, albeit slightly reduced, and it is understood that their tactics have changed such that all manner of offers are discussed with visitors – presuming that this tactic seeks to manipulate loop holes to the current restrictions. It is quite clear that visitors are attracted by the pop up stands and body clad placards, believing them to be bona fide providers of tourism services, and this both tarnishes the reputation of the city and denies our own Tourist Information Centre from providing this service and deriving a revenue. Efforts should be made to enhance visible patrols and formal engagement rather than consideration be given to allowing the PSPO to expire. Touts operate in a persuasive yet aggressive and intimidating manner, and this can only be bad for the good name of the city. King’s Parade, immediately adjacent to the main entrance of King’s College, is arguably the busiest spot in Cambridge with a very heavy concentration of individual and groups of tourists. Removing the touts would make the area less crowded and it would allow greater movement of people in this area. Extending and enhancing the PSPO would at the very least maintain a less unsatisfactory situation and possibly lead to further improvements should this matter be allocated more resources to control. I have to agree with earlier responses that if the PSPO was allowed to lapse then the number of punt touts would inevitably increase as would the cost and time required by Cambridge City Council to manage their anti-social behaviour. I thus reiterate most strongly that the PSPO should be extended, and would be most grateful if the above observations could be taken into account.”

### **Punt Operator**

“Although the illegal use of GHL and Laundress green has stopped, some touting along Kings Parade is still happening, with tours being sold on to operators willing to take them. I feel in the past, small remnants of touting have been allowed to regain traction, and the problem has escalated, and hope that the same will not occur this time round.”

## **Punt Operator**

“We would like to place our comments regarding the PSPO. We believe this should be continued. Without the continuation of the PSPO the original behaviour will probably reoccur.”

## **Punt Operator**

We are writing with regard to the PSPO - Public Spaces Protection Order (Touting) 2016. [...]. We would make the following observations:-

- i. We abide by the Voluntary Code of Practice for the Visitor Industry (2012) which was designed “to reduce nuisance from commercial touting in the city centre”. The Voluntary Code’s measures include restricting touting associated with the 6 formally authorised punt station to specific areas in the vicinity of those punt stations, limiting the number of touts deployed at any one time and the conduct of touts. The Voluntary Code is effective at Silver Street (where it applies to two punt operators based at two formally authorised punt stations) and at Trinity College (where it applies to one operator based at one formally authorised punt station). However, it is not terribly effective at Quayside (where there were two punt operators when it was introduced but are now six operators based at two formally authorised punt stations). The Voluntary Code is ignored by one punt operator based at a formally authorised punt station at Newnham Mill Pond.
- ii. The PSPO was welcomed by most of the authorised punting companies as it demonstrated a clear message of intent on the part of Cambridge City Council to address the nuisance and anti-social behaviours that can result from touting.
- iii. Last year’s High Court injunction further demonstrated the City Council’s commitment to resolving public nuisance issues associated with commercial punting by stopping the use of their land by unauthorised operators. The level of touting activity on King’s Parade and other city centre locations immediately fell as a result of the injunction, although the injunction only applies to City Council land and does not itself stop punt operators with formally authorised punt stations from touting within the city centre.
- iv. Over the past few months the level of touting in the city centre has started to rise again as the punt operator that has chosen not to abide by the Code of Conduct has expanded its operations on King’s Parade and the city centre. This one company has an arrangement with many of the same individuals that were working previously on King’s Parade and the city centre. [...].“
- v. Unfortunately, despite some signs of progress last year, nuisance touting remains a serious issue in Cambridge and so we strongly believe it would be premature for the City Council to lift the PSPO. We feel that a failure to extend it for a further 3 years would send out the wrong message with regards to the Council’s ongoing commitment to tackle these anti-social activities through the various means at its disposal.

- vi. To conclude, we believe that the touting situation is not fully resolved and would suggest that a town centre free of touting should occur for at least 12 months before any thought of lifting the order is considered.

Thank you for considering our feedback.

#### **City Council: Property Services**

“I think the benefit of the injunction and PSPO together has not yet gone a full season and while it would appear that there has been an improvement, it is early days. Having been touted myself recently, clearly breaches still continue and ongoing enforcement is needed. Given the historical difficulty in addressing punting related issues, be it touting or use of the Council’s land, leading to the need to seek a High Court injunction, it would seem unwise to cease the PSPO at this stage. An extension would allow the Council to see over a longer period of time whether or not the issues have been resolved. To my knowledge, the only operator benefitting from touting within the PSPO area is Granta Punts through referrals from touts on Kings Parade. Where possible, the Council seeks to include touting provisions and restrictions in its leases to operators but not all punt station are in Council control. Some of the Council’s leases do not have tout restrictions and while these will be sort through the lease renewal process, the PSPO helps in this respect where operators do not abide by the voluntary code.”

#### **City Council: Streets and Open Spaces**

“Since the introduction of the PSPO in 2016, ninety two fixed penalty notices have been issued to persons caught verbally touting for punt tours, during this time nine individuals were successfully prosecuted for repeat offences within a six month period, it is the opinion of the officers of this department that if the PSPO was allowed to lapse, it would not be long before Kings Parade and the other usual haunts would be flooded with touts. If extending the PSPO for a further period of three years, it would be a good opportunity to amend the PSPO to include the areas which were missed off from the original PSPO”.