

PcLicensing  
Unit 16829  
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14<sup>th</sup> August 2019

Re: Scudamores Punting Co Ltd,  
32c Bridge Street, Cambridge

To concerned residents,

My name is Peter Conisbee and I am the licensing consultant working on behalf of Scudamores Punting and would like to take this opportunity to explain a little more about the application, which I hope will allay some of your concerns.

As there are numerous objections, I will deal with all of them by this one letter, and detail each individually, some of which are mirrors of others or duplications. So, whilst you may not have personally raised one of the specific points mentioned, I think it is important you see others' concerns and how they are dealt with.

Firstly, it is important to point out that Scudamores chauffeured punts operate between Bridge Street and Mill Lane. Bridge Street is approximately 0.1 mile or 160m from Beaufort Place and the punts go in the opposite direction, away from Beaufort Place. Therefore, residents of Beaufort Place will not be affected by the chauffeured punts referred to in this application.

Secondly, alcohol can only be consumed on punts that are chauffeured, starting from the Bridge Street punt station. The chauffeur will then take the punt toward Mill Lane, immediately leaving the Cumulative Impact Area. Whilst the punt station is in the Cumulative Impact Area, the alcohol will be consumed on the river away from the punt station, therefore outside of the Cumulative Impact Area, so the actual impact to the designated area will be virtually non-existent.

This licence application, if granted, will not increase traffic on the Cam. The application is merely to give Scudamores control over their already existent alcohol packages that are provided by other companies.

### Current Operation

Scudamores Punting already provide alcohol packages and have done so for a number of years. Currently *they* do not directly provide alcohol to their customers. Bookings for the packages are available through their website. The point of sale and booking thereafter is dealt with individually by the company providing the alcohol. Effectively, Scudamores have nothing to do with the current alcohol bookings/sales, they provide the other company with their staff and punt only. The current packages available are as follows;

### Cocktail Punting

This is fulfilled by a Local Licensed Company based in Cambridge.  
The alcohol is delivered by the other company to the boats and two cocktails are made on the boats by a bartender from the other company. Everything is packed and taken back to the other company. Scudamores then invoice the company for payment for the use of their boat and staff.

### Gin Punting

This is fulfilled by a Local Licensed Company based in Cambridge.

Alcohol is delivered by the other company in sealed hampers to the boats. The gin is consumed on the punt. After the end of the booking, the hampers can be taken either by the customer as a keepsake or taken back to the company.

Scudamores then invoice the company for payment for the use of their boat and staff.

### Wine Tasting

This is fulfilled by an accredited and licensed wine specialist.

The specialist brings 6 wines for tasting on the boats. After the end of the event, the specialist clears the boat and disposes of the wine remaining.

Scudamores then invoice the specialist for payment for the use of their boat and staff.

### Further General Information

The current bookings manager has been in post for over 4 years. In that time, he has no knowledge of Scudamores Punting Co Ltd receiving any complaint from local residents, the local authority, environmental health or the police. They have had no reports of disturbances in this time on any punt where alcohol has been provided nor have there been any reports of people injuring themselves or falling off the punts.

The police and Council were spoken to regarding the application prior to its submission. A number of conditions were discussed, all of which Scudamores had already decided to include.

Currently there is NO legislation for the use of alcohol on punts, and Scudamores are well aware of the issues caused by some users. It is for this reason that they have applied to take control, and in doing so, are offering assurances through sensible conditioning already discussed with the police and council.

Scudamores are offering to regulate themselves so as to prove that they are a responsible operator. Without the licence there is no direct regulation, and they are also future-proofing the licence against any other operator taking over the site and transferring the licence. This is an extremely important point, as the licence could not be run as a standard off licence selling to random passers-by.

All sales of alcohol must be pre-booked as part of a chauffeured punting trip

There will be no high-strength lager, beer or cider

Alcohol can only be consumed on boats that are chauffeured

No tour customers are allowed to command the vessel or take control from the trained chauffeur

Between January and the end of July 2019, some seven months, there have been only 3 Gin punting bookings, 28 Cocktail punts, and no wine tasting punts. This totals 31 trips on punts where alcohol has been pre-booked for consumption. In the same time frame over 2,000 chauffeured punts have been pre-booked. Therefore, less than 1.6% of the pre-booked chauffeured punts hired out by Scudamores will be subject of this licence application. An exceptionally tiny percentage.

### Objections

The cumulative impact has not been considered.

***The practice is already taking place as Scudamores customers are provided with the alcohol by other companies. Clearly from this point, there is no increase in cumulative impact. As stated, this is NOT a standard off licence premises. The term 'off-licence' is purely for the manner in which alcohol is sold, for consumption off the premises. Scudamores have conditioned their licence***

***application quite strictly, alcohol must be pre-booked and can only be consumed on chauffeured boats. There is no possibility of another company taking on the licence and running the venue as a standard off-licence. This future-proofing of the licence application was responsibly offered by Scudamores, not by request. They have also included a rigorous Challenge 25 policy, and other protective internal policies also exist, (see answer below regarding noise and disruption). And as stated, the punt leaves the Cumulative Impact Area immediately it sets off on its journey, so the impact, if any, is therefore negligible.***

No rigorous supervision of the punt chauffeurs who are selling the alcohol.

***NO chauffeurs are selling the alcohol. ALL alcohol sales are pre-booked. ALL chauffeurs will be trained in Challenge 25 as per the operating schedule.***

All drinking vessels used will be polycarbonate, which is not in keeping with the council's commitments to reduce single-use plastic in the city.

***A responsible authority requested the use of plastics, they were however already in use by the company. They are single use and fully recycled after each booking. The cups and flutes remain in the cool boxes and are cleaned and recycled. The company purchased these vessels with the intention to have a low energy consumption and CO2 footprint, yet still able to fulfill the company's needs. For example, more than 200 staff have refillable water stations with a mix of reusable and paper biodegradable cups.***

This application would bring additional alcohol outlets in the area surrounding Bridge Street and Jesus Green.

***The application for off-sales is in no way similar to that of the traditional off-licence. A member of the public cannot simply walk up and purchase alcohol from the company. It can ONLY be purchased if pre-booked for use on a chauffeured punt – this really is quite specific off-sales. Scudamores punts operate from Quayside to Mill Lane, they do not operate in the Jesus Green area.***

This application will result in a considerable increase in punt traffic on the river

***As stated previously, there will be no increase in punt traffic as a result of this application. Scudamores are already facilitating these packages through other parties.***

Noise and disruption occasionally caused by some punters, undoubtedly enhanced by drinking.

***If a person who has pre-booked alcohol is believed to be drunk, or already had too much to drink, in the same way a responsible bar tender would, they will be refused service and will not set foot on the boat. Should anyone become unruly on the boat, the chauffeurs will politely ask them to calm. If they do not, they will be escorted to the closest bank with safe mooring and required to vacate the punt. To date, the company have never needed to resort to this procedure.***

The availability of alcohol and the use of punts increases the risk of boating accidents, individuals falling into the river, serious injuries and life-threatening consequences.

***Every person stepping foot onto a Scudamores boat, where alcohol is involved, is vetted beforehand for intoxication, and dealt with accordingly as previously stated. The trips are between 30-45 minutes, as previously stated there are no known incidents of any person falling in from a Scudamores chauffeured punt, intoxicated or sober.***

There will be additional waste.

***The practice is already happening, therefore there will be no increase in waste. The punts are always cleared of waste appropriately by the chauffeurs at the end of the trip. Any waste on the trip is kept within the punt. This is and has always been a policy of Scudamores.***

General noise, disturbance, anti-social behavior.

***As previously stated, there have been no calls of complaint from the public, local authority or police to the company. The company have procedures in place to deal with customers causing a disturbance should they ever need to resort to using them, but to date, they have not.***

The company has no toilet facility, public toilets on Quayside close at 8pm, this application will increase fouling in the area

***All the aforementioned pre-bookings for chauffeured alcohol punts have taken place between 12 noon and 5pm. Furthermore, the application to licence till 10pm is generally for ease. At some points of the year the company is closed in the evenings, and the 10pm time frame would only be in use for approximately 2 months of the year.***

Bottling out at 2200 hours implies a trip ending later

***Bottling out from the premises is prohibited between 2200 hours and 0700 hours. This was a condition voluntarily offered by Scudamores. Even before this application, Scudamores disposed of their waste much earlier in the day as a matter of course. Scudamores is closed at 2200 hours, trips cannot go beyond that time.***

Scudamores must be expecting an increase in revenue to result from their proposed level of investment which can only come from an increase in punting volume

***As mentioned earlier, Scudamores are applying for this licence to take control of the current offering. At present the alcohol packages are purchased through another party, and there is no conditioning for its use. By submitting this application, Scudamores are taking responsibility and conditioning its use. This application is not submitted to increase revenue/punting volume***

No mention of selling wines or spirits of high volumes

***Wines and spirits are generally a higher volume than beer, lager and cider. The reasoning for ensuring no sale of beer, lager and cider above 5.5abv essentially deals with cheap to purchase, high volume alcohol. This figure was agreed on with one of the responsible authorities before the application was submitted and is based on health and safety and public disorder grounds.***

Protection from children from harm, as punting encourages families

***The policy of Challenge 25 deals adequately with this issue.***

### Responsibility

Scudamores chauffeurs are experienced and professional. Those working the Cam where alcohol has been pre-booked are quite dissimilar to the use of a private self-hire punt, where the hirer has taken alcohol on board, these seem to be the least experienced at navigation, and perhaps where the real issue lies.

Scudamores is not applying nor do they have any desire to operate a floating off-licence selling to whoever wishes to purchase along the Cam, as they consider this irresponsible and a negative impact to the residents of the area.

Scudamores is already, through other operators, selling alcohol packages for use on their punts. They currently have NO regulations for its use. This application regulates that use and as such is evidence of their responsible attitude.

Scudamores have taken the decision seriously. They have decided to apply for a licence to show the responsible authorities and the general public alike that they are a responsible thoughtful operator, who through their own regulation will be controlled and accountable.

Should any person wish to discuss this further or clarify any point, please feel free to email me, call the number as shown below or email the council to pass on to me.

Many thanks for your time in reading this

Kind Regards

Peter

**Peter Conisbee Q.Inst.Pa**  
**Licensing Consultant and Associate of Club Power**

