



Association of Pleasure Craft Operators

Sally Ash
Head of Boating Development
British Waterways

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BW Mooring Tenders Consultation

Dear Sally,

As you know when the trial of the system of BW Mooring Tenders was announced, APCO publicly supported the concept as a brave attempt to set “market rates” for moorings, but questioned if the mechanism chosen was the best method.

I was very pleased to read the summary introduction on page 2 of the consultation document http://www.britishwaterways.co.uk/media/documents/BW_Moorings_Consultation_28_05_08.pdf by Robin Evans stating:

- *Boaters want a good choice of readily available moorings at a fair price.*
- ***Boating businesses need a level playing field without any risk of unfair competition arising from grant funding to BW.***
- *Government expects transparency and pricing which is based on prevailing market Conditions.*

I do however have a number of productive criticisms of the mechanism of delivering the above.

- The system appears to be rather complex, and has resulted in considerable expenditure of both BW monetary and managerial resources. Perhaps a simpler mechanism and evaluation process would have delivered more transparent results for less money and less time. There is a danger that BW could be seen “as not seeing the wood for the trees”?
- I like the actual tender page with the photographs of the moorings on Waterscape- the detailed information about each site is very useful- *certainly the way information on mooring vacancies is displayed should be retained.*
- But I noted when accessed today; many have not received any tenders. The number of viewings in proportion to tenders made seems low If the viewing to tender conversion rate is so low can the mechanism be seen to be effective?
- The evaluation system certainly appears to be VERY comprehensive with 11 documents on the consultation page of the BW website. *Presumably the cost of hiring consultants and senior management time spent will also be part of the evaluation.*



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- *I note that if those taking part actually read every page of the consultation they would need to explore 6 BW documents running to 59 pages and 3 Consultants documents totalling 95 pages and 1 large Excel document!*
- I have received feedback from APCO members concerned that the undertakings from BW to remove 10% of online moorings in the locality of new marinas have not always been met. Supposedly, due to the difficulty in finding suitable moorings to release. Yet a large percentage of moorings offered for tender- receive no actual tenders. *These two factors seem hard to reconcile.* Perhaps further tendering could be used to identify unpopular online moorings that could be removed?
- I note that Waterscape is used to display mooring vacancies, perhaps consideration should be given in the future- in the interests of competition transparency- to allowing non BW moorings to be offered on Waterscape at the same costing as BW uses to calculate its own vacancies and in the same manner? (This could be by tender if the process continues or by geographical vacancy listing)?

A few questions have therefore arisen?

1. Is the tender process and the complex consultation a good use of scarce BW resources, which might be better directed to more pressing issues effecting many more individuals- such as licensing enforcement?
2. Could a simpler system achieve the same or better results? *I am not sure which of your options is best, but certainly think there should be a robust reserve price.*
3. Why is there such a low tender rate- would a simpler system achieve better results?
4. Would BW consider using the tendering system to remove moorings that achieve no tenders when they need to meet the 10% online reduction undertakings?

Yours sincerely,

Nigel Hamilton
Chairman of APCO