

To whom it may concern,

The Inland Waterways Association wishes to respond formally to the British Waterways' consultation on mooring allocations, and mooring auctions.

IWA remains implacably opposed to any notion of auctioning off moorings sites whether online or not.

IWA believes that British Waterways has a duty to provide 'lower level' un-serviced moorings, which should be provided on a 'first come first served' basis in order to maintain access to the network for those who may be on low or fixed incomes and to prevent 'social exclusion' by creating a network populated only by affluent boaters.

IWA understands that no other mooring provider allocates or prices its moorings by auction. Most rely on a price list, as does your own marina operations. IWA wishes to understand why British Waterways is unable to do the same and why it wishes to have the complication of a system where the price of a mooring can vary substantially from that of an adjacent mooring for a similar length boat with similar facilities.

IWA maintains that mooring values may be easily identified by British Waterways by simple reference to the local market and by comparison with adjacent sites; with suitable adjustment for any variance on facilities provided. This method is well understood and is adopted by all estate agents. Why is this not practicable for British Waterways to adopt?

IWA is further concerned that in setting out its matrix of options British Waterways has sought to load the consultation in favour of its own favoured response and in effect seek to justify its previous approach to electronic tendering.

To conclude, IWA believes that the fairest and simplest system would be to have a transparent published list of sites. We agree that where several offers are received for the location making a selection by a draw of bidders seems to be the fairest means of avoiding prejudice to non internet users. The use of the term 'lottery' in this respect may be inappropriate as it is an emotive term. A substitute term may be necessary to avoid negative perceptions of the process of allocation.

Yours faithfully,

Jo Gilbertson  
Campaign & Communications Manager

## DIRECTLY MANAGED MOORINGS: PRICING AND VACANCY ALLOCATION PUBLIC CONSULTATION RESPONSE FORM

You may respond to the consultation in whichever way you wish. If it is easier for you, please use this form and append any further comments. To do this electronically simply download the form in word format from [www.britishwaterways.co.uk/mooringconsultation08](http://www.britishwaterways.co.uk/mooringconsultation08) , add your further comments and email it to [consultation@britishwaterways.co.uk](mailto:consultation@britishwaterways.co.uk)

The closing date for responses is **20 August 2008**.

Paper copies should be posted to:

The Consultation Team, British Waterways, 64 Clarendon Road, Watford WD17 1DA.

If you have any **questions** about the consultation, please contact us:

E: [consultationquestions@britishwaterways.co.uk](mailto:consultationquestions@britishwaterways.co.uk) T: 01923 201120 F: 01923 201300

### Q1 Options for allocating mooring vacancies (please read chapters 5 and 6 first)

Using the information provided in the consultation document and its appendices, please use your judgement to score each of the listed options against the assessment criteria.

	How Transparent?	Operating costs	How acceptable?	How good a measure of market price?	Total score
	1= not transparent 10 = transparent	1 = high cost 10 = low cost;	1 = poor 10 = good	1 = poor 10 = good	
1. Waiting lists* within clear rules	10	4	8	7	29
2. Tender trial	5	4	5	10	24
3. Modified tendering	5	3	4	10	22
4. Open auction	5	2	1	10	18
5. Fixed price with lottery	10	4	10	8	32

If your judgement differs greatly from that in the table in section 6.6 of the consultation document, please explain your reasoning.

IWA remain implacably opposed to any notion of auctioning off moorings sites whether online or not as they bid up prices and are not transparent, adding uncertainty to the cost of maintaining a boat on their network. Such systems do not allow people to evaluate the options and then place an order easily. Published prices represent the most transparent and easily understood method of offering mooring sites.

We believe that option 5 is the fairest and most transparent method of allocating moorings , however, the use of the term lottery is an emotive term and a substitute term needs to be found to explain the method of allocation if there is more than one customer .



