

**From:** [Mark Groves](#)  
**Sent:** 26 August 2025 09:44  
**To:** [Rachel Clarke](#)  
**Subject:** FW: URGENT - RE: [CASE:1517276] The Fuel Boat (registered name Frederick) - Licence No 520859

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Hi Rachel,

Please add this to the record as the representation from the Canal and River Trust.

Kind regards

Mark Groves  
**Lead Licensing and Enforcement Officer**  
**Public Protection Partnership**  
Email: [REDACTED]

**Website:** [www.publicprotectionpartnership.org.uk](http://www.publicprotectionpartnership.org.uk)  
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**Twitter:** [@PublicPP\\_UK](#)

**Public Protection Partnership** | **Bracknell Forest West Berkshire**



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**From:** Tammy Plant <Business.boating@canalrivertrust.org.uk>  
**Sent:** 20 August 2025 12:22  
**To:** Mark Groves <Mark.Groves1@westberks.gov.uk>  
**Subject:** Re: URGENT - RE: [CASE:1517276] The Fuel Boat (registered name Frederick) - Licence No 520859

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Dear Mark

The craft is registered as a Continuous Cruiser, Roving Trader [Roving traders | Starting a boat business?](#)

Some roving traders have a home mooring, but Frederick (520859) does not and as such is required to [comply with the guidance for boaters without a home mooring](#) and published time limits at visitor moorings at all times. Given this the craft will be trading from multiple locations across the network and does not have on single permanent trading location.

The British Waterways Act 1995 states that if you don't have a home mooring, you must be undertaking 'bona fide navigation'. Bona fide is a legal term meaning 'good faith', and 'bona fide navigation' means that you are genuinely cruising a fair range of the network. The law does not stipulate how far you must cruise or how often you must move, but customers should be on a continuous journey, not just moving backwards and forwards along one stretch of water. This generally means no longer than 14 days on most of the network or less where signs indicate. Visitor moorings in popular locations are frequently limited to 1, 2 or 5 days to enable everyone to enjoy the facilities.

Given this it is likely that the operator will trade in more than one Local Authority and therefore will require multiple Premises Licences (one for each Local Authority).

The Trust have a process to review and assess new proposals. Customers are required to submit an operating proposal via our online system for appraisal. If approved they can proceed to purchasing a business licence or approval for their existing licence to include the additional trading elements. If approved we require a copy of the public liability insurance, risk assessment and Premises & Personal Licence. We have received an operating Proposal 05/08/25 for the inclusion of general items for sale and also the sale of alcohol from the craft Frederick. Our target response date is 22/09/25. We have wrote to Miss Blakely (Butt) on 19/08/25 requesting further information to support her application. At this time Miss Blakey has not supplied the required documentation for the Trust to be able to make a decision at the time of writing the representation whether to grant or refuse the application. As alcohol and fuel are both flammable liquids and pose serious combined fire risks we are at this time unable to approve the submission with the detail provided.

We have requested a revised submission that includes:

- A detailed plan and layout showing the location and separation of alcohol and fuel storage. Combined storage of fuel and alcohol is not permitted, regulations require separate storage solutions. Alcohol and fuel should not be stored together in the same room, instead separate, ventilated, fire-rated storage areas are required. If there are only small quantities to be kept then approved safety cabinets can be provided but ignition sources are to be kept away. We have requested a plan demonstrating this.
- Specifications of ventilation systems and ignition source controls.
- Confirmation of compliance with relevant fire safety codes - adhere to fire safety regulations, HSE Guidance: HSG51-storage of flammable liquids in containers.

- Clarification on residential use and associated safety measures - how will the operator safely separate living accommodation from the Fuel and alcohol spaces.

They will need to consider escape routes, ensure adequate ventilation and spill containment, good house keeping and leak checks.

It is advised that operators limit stock to small quantities, keeping only the amounts needed for one working shift and store the rest away properly. Given the craft is the operators main base we are unsure if they have the option to do this and instead all stock will be kept on the boat. This does pose a higher risk.

As the operator is trading on a continuous cruising basis, it is likely require they will trade in more than one Local Authority. We will require evidence of Premises Licence for each Local Authority to support the Operating Proposal before we can provide approval.

At this time the Trust are unable to make a decision at the time of writing the representation and have therefore had to object to the application. As alcohol and fuel are both flammable liquids and pose serious combined fire risks we are at this time unable to approve the submission with the detail provided.

Regards

Tammy Plant  
Business Boating Team  
Canal & River Trust

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