

Licensing Team Leader  
Licensing Section  
Tameside Metropolitan Borough Council  
Tame Street Depot  
Tame Street,  
Stalybridge  
SK15 1ST

Email [licensing@Tameside.gov.uk](mailto:licensing@Tameside.gov.uk)

Dear Sir/Madam

## **OBJECTION TO APPLICATION FOR PREMISES LICENSE, VALE MILL LODGE, MOSSLEY OL5 9LL.**

I wish to object to the proposed application for a premises license at the above address and would be grateful if this letter could be taken as intimation of my objections.

My objections are on the following grounds:-

- 1) Inconsistent with licensing objective-Public Safety (Highways-access)
- 2) Inconsistent with licensing objective-Public Safety (Highways-parking)
- 3) Inconsistent with licensing objective-Public Safety (Highways-existing accident data)

The grounds for these objections are as follows:-

### **1) Inconsistent with licensing objective-Public Safety (Highways-access)**

Prior to the current application for a licensed premises the Vale Mill Lodge (VML) site was occupied since around 2016 by Tiptoes children's counselling service and before that was purchased in 2001 by Chapman Gee, an IT business.

Both businesses largely operated on a typical 9 to 5 basis and with the typically light traffic flows one would associate with day to day office use.

The current application for a premises license at Vale Mill Lodge (VML) is associated with the upcoming conversion of the building to a licensed bar restaurant with takeaway use spread over 2 floors with the ground floor at 127sqm and beneath ground 75sqm (figures taken from Breakey & Nuttall Chartered Surveyors Listing for VML rental-2023).

It is our view that the proposed premises license will result in considerably increased traffic flows and parking demand from previous office use (quantified later in document).

With this in mind TMBC will want to ensure that the existing access, car park and immediate highway network can operate safely and efficiently following any approval of a premises license.

To assist in this vein a general arrangement plan VLM-01 (attached at end of document) sets out the site location, site boundaries, existing parking and site access visibility.

Site access visibility is a critical pre-determinant of public highways safety. The national standard visibility requirement for 30mph local roads is set out in Table 7.1 of Manual For Streets and is set at 43m with a set-back of 2.4m from the give way line. This standard is reciprocated across most UK local authorities and has been acknowledged in previous planning decisions at TMBC. The visibility distance is a function of driver reaction time and deceleration rate and is the distance within which drivers need to be able to see ahead and stop safely from a speed of 30mph.

You will see from the attached plan that the existing access does not meet the safe visibility standard of 43m. Visibility to the north to oncoming traffic whilst exiting the site is severely restricted at only 7m whilst visibility to the south is again restricted to only 27m (with obstructions), both far short of the required 43m standard. Whilst this is an existing situation it is reasonable to contend that visibility issues will be greatly exacerbated by the increased number of trips associated with VML as it transitions from office use to a licensed premises.

Vehicle Trip Generation

To quantify the number of trips which the proposed licensed premises is forecast to generate reference is made to the TRICS database land use 06 for Food/Drink/Take-away premises and a comparison made with previous office/business use.

Based on the VML 127sqm Gross Floor Area (GFA) at ground floor level we have a combined total of **23 vehicles** for food/drink/takeaway use compared to **5 vehicles** for employment/office use arriving and departing the site in the peak evening hour:-

	Trip Rate- Food/Drink/Takeaway		Trip Generation- Food/Drink/Takeaway	
	ARR	DEP	ARR	DEP
Peak Hour	8.765	8.367	12	11

	Trip Rate- Employment/Office		Trip Generation- Employment/Office	
	ARR	DEP	ARR	DEP
Peak Hour	0.325	2.307	1	3

Based on the VML 75sqm Gross Floor Area (GFA) at sub-ground floor level we have a combined total of **13 vehicles** for food/drink/takeaway use compared to **3 vehicles** for employment office use arriving and departing the site in the peak evening hour:-

	Trip Rate- Food/Drink/Takeaway		Trip Generation- Food/Drink/Takeaway	
	ARR	DEP	ARR	DEP
Peak Hour	8.765	8.367	7	6

	Trip Rate- Employment/Office		Trip Generation- Employment/Office	
	ARR	DEP	ARR	DEP
Peak Hour	0.325	2.307	1	2

TRIP RATE for Land Use 06 - HOTEL, FOOD & DRINK/G - TAKE-AWAY SHOPS (eg. fish bars etc)

**TOTAL VEHICLES**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00									
08:00 - 09:00									
09:00 - 10:00	1	60	3.333	1	60	3.333	1	60	6.666
10:00 - 11:00	2	80	4.375	2	80	0.625	2	80	5.000
11:00 - 12:00	6	132	2.911	6	132	2.532	6	132	5.443
12:00 - 13:00	6	<b>132</b>	<b>6.835</b>	6	<b>132</b>	<b>5.570</b>	6	<b>132</b>	<b>12.405</b>
13:00 - 14:00	6	132	7.089	6	132	6.835	6	132	13.924
14:00 - 15:00	6	132	6.203	6	132	7.848	6	132	14.051
15:00 - 16:00	7	133	5.054	7	133	4.731	7	133	9.785
16:00 - 17:00	11	133	4.586	11	133	3.628	11	133	8.214
17:00 - 18:00	11	133	6.366	11	133	5.955	11	133	12.321
18:00 - 19:00	<b>12</b>	<b>126</b>	<b>8.765</b>	<b>12</b>	<b>126</b>	<b>8.367</b>	<b>12</b>	<b>126</b>	<b>17.132</b>
19:00 - 20:00	12	126	8.499	12	126	8.367	12	126	16.866
20:00 - 21:00	12	126	7.304	12	126	8.300	12	126	15.604
21:00 - 22:00	12	126	4.382	12	126	5.046	12	126	9.428
22:00 - 23:00	11	131	2.835	11	131	3.043	11	131	5.878
23:00 - 24:00	9	146	2.049	9	146	2.352	9	146	4.401
<b>Total Rates:</b>			80.586			76.532			157.118

**TRICS Trip Rate Output Data-Food/Drink/Take away**

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

**TOTAL VEHICLES**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	414	0.897	7	414	0.103	7	414	1.000
08:00 - 09:00	<b>8</b>	<b>385</b>	<b>2.632</b>	8	385	0.227	<b>8</b>	<b>385</b>	<b>2.859</b>
09:00 - 10:00	8	385	1.592	8	385	0.942	8	385	2.534
10:00 - 11:00	8	385	0.812	8	385	0.650	8	385	1.462
11:00 - 12:00	8	385	0.715	8	385	0.715	8	385	1.430
12:00 - 13:00	8	385	0.747	8	385	1.105	8	385	1.852
13:00 - 14:00	8	385	0.715	8	385	0.682	8	385	1.397
14:00 - 15:00	8	385	0.617	8	385	0.877	8	385	1.494
15:00 - 16:00	8	385	0.325	8	385	0.552	8	385	0.877
16:00 - 17:00	8	385	0.520	8	385	1.624	8	385	2.144
17:00 - 18:00	8	385	0.325	<b>8</b>	<b>385</b>	<b>2.307</b>	8	385	2.632
18:00 - 19:00	7	414	0.345	7	414	0.690	7	414	1.035
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
<b>Total Rates:</b>			10.242			10.474			20.716

**TRICS Trip Rate Output Data-Employment/Office use**

Based on the previous data it can therefore be concluded that the development will result in greatly increased vehicle trips to the site, by a factor of 4, compared to historic office use.

Most problematically the increased trips will occur in the evenings when the existing 8 bay informal car park and on-street parking are already at capacity (through adjacent Gracie jiu jitsu gym use) as can be evidenced by the consecutive 3 day photographic survey presented in plan VLM-01 (attached at end of document).

## **2) Inconsistent with licensing objective-Public Safety (Highways-car park)**

The granting of a premises license would significantly increase parking demand from existing office use.

There is an existing area of waste land adjoining the VML which is currently used as an informal unmarked car park (see plan VML-01). I understand this car park will be utilised by VML to accommodate all visitors, staff, taxis and deliveries to the licensed premises during its proposed licensed hours from 10.00am to 11.00pm. The car park is unlit, uneven and the gradients exceed 1 in 12 making it unsuitable for the able-bodied, disabled, pushchairs or wheelchair users. The car park is bordered by a knee high red brick wall with a shear face vertical drop into a stream of 2m.

Currently the car park has capacity for 8 vehicles and these spaces are taken up by existing Jiu Jitsu Gym users from 5pm to 9pm Mon, Tue, Wed, Thu and on Sat mornings, with overspill of parking onto the adjacent blind bend on Huddersfield Rd, this occurs without exception every evening the gym is open.

A photo survey over 3 consecutive days of the car park at capacity has been undertaken and the results are shown on the attached plan VML-01, it's clear to see that available parking space is saturated both within the informal car park and also on nearby Huddersfield Rd which is subject to busy pedestrian use and is the main arterial route for school children to Mossley Hollins School. To demonstrate the additional parking requirements a licensed premises will bring with it compared to previous office use, reference has been made to Tameside's own parking standards.

4/16/2015

Development Control Policy - Car parking standards for new developments

	floor space.	
ii) Food Halls	See 1 (ii) above Residents: see 1(i) above Staff: 1 space per 1,000 ft <sup>2</sup> (93m <sup>2</sup> ) of gross floor space.	Customers: 1 space per 100ft <sup>2</sup> (9.5m <sup>2</sup> ) gross floor space
3. Industry	See 1(ii) above	1 space per 700ft <sup>2</sup> (65m <sup>2</sup> ) gross floor space
4. Offices	See 1(ii) above Resident: see 1(i) above	1 space per 300ft <sup>2</sup> (28m <sup>2</sup> ) gross floor space
5. Warehouses	See 1(ii) above	1 space per 2500ft <sup>2</sup> (232m <sup>2</sup> ) gross floor space
6. Restaurants	See 1(ii) above Residents: see 1(i) above Staff: 1 space per 900ft <sup>2</sup> (84m <sup>2</sup> ) gross floor space	Diners: 1 space per 50ft <sup>2</sup> (4.6m <sup>2</sup> ) of the dining room
7. Public Houses	See 1 (ii) above Residents: see 1(i) above Staff: 1 space per 900ft <sup>2</sup> (84m <sup>2</sup> ) gross floor space	Bar customers: 1 space per 25ft <sup>2</sup> (2.3m <sup>2</sup> ) of public drinking area
8. Transport Café	See 1(ii) above Residents: see 1(i) above Staff: 1 space per 900ft <sup>2</sup>	Customers: 1 lorry space (artic) per 20ft <sup>2</sup> (1.9m <sup>2</sup> ) dining area

### *Tameside Parking Standards*

For office use 1 space is required for every 28sqm of gross floor space, for licensed premises 1 space is required for every 2.3sqm of public drinking area with restaurants requiring 1 space per 4.6sqm of the dining room, increasing parking demand by a factor of 10 for a licensed premises (and a factor of 6 for restaurant alone).

Therefore Referencing Plan VML-01 we have:-

Ground Floor Net Seating Area 40sqm (main area) + 30sqm (function room) = 70sqm

= 30 parking spaces for licensed bar use

= or 15 parking spaces for restaurant use

If we include the basement seating area at 50sqm we require:-

= 21 parking spaces for licensed bar use

= or 11 parking spaces for restaurant use

The gross floor area of the premises as defined in the applicants estate agent listing (attached) is 125sqm first floor and 75sqm basement floor.

The net seating areas used in the above parking calculations are therefore very conservative estimates of parking demand when comparing the 70sqm/30sqm net for ground + basement versus the 125sqm/75sqm as described in the Surveyors listing.



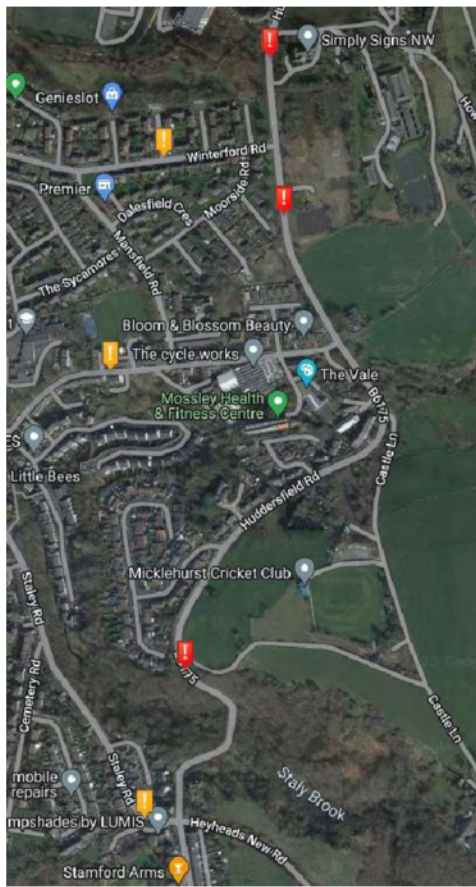
Even ignoring the parking requirement for licensed premises at 51 parking spaces and again ignoring any takeaway parking demand, the parking requirement based on restaurant use alone would amount to 26 parking spaces versus the 8 available but occupied by gym use.

**3) Inconsistent with licensing objective-Public Safety (Highways-existing accidents)**


The stretch of Huddersfield Rd onto which the existing sub-standard VML access exits is renowned locally for high vehicle speeds, and is in advance of a tight bend with poor forward visibility.

As has been evidenced previously the licensed premises will result in a greatly increased number of vehicle trips accessing and leaving the site via a sub-standard access where visibility is extremely poor.

Data from the Crashmap website indicates there have been a total of 9 serious injury casualties along Huddersfield Rd within the last 5 years.



**Crashmap accident data**

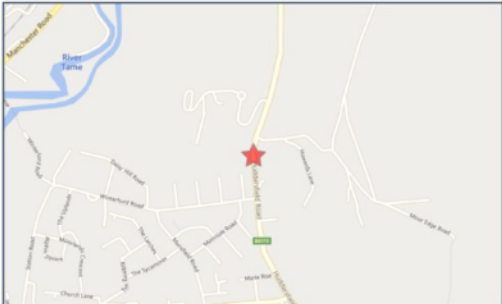

crashmap.co.uk


Validated Data

<b>Crash Date:</b>	Sunday, July 09, 2017	<b>Time of Crash:</b> 9:05:00 PM	<b>Crash Reference:</b> 201706G032786
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<b>Highest Injury Severity:</b>	Serious	<b>Road Number:</b> B6175	<b>Number of Casualties:</b> 2
<b>Highway Authority:</b>	Tameside		<b>Number of Vehicles:</b> 2
<b>Local Authority:</b>	Tameside Metropolitan Borough		<b>OS Grid Reference:</b> 398331 402459
<b>Weather Description:</b>	Fine without high winds		
<b>Road Surface Description:</b>	Dry		
<b>Speed Limit:</b>	30		
<b>Light Conditions:</b>	Daylight: regardless of presence of streetlights		
<b>Carriageway Hazards:</b>	None		
<b>Junction Detail:</b>	Not at or within 20 metres of junction		
<b>Junction Pedestrian Crossing:</b>	No physical crossing facility within 50 metres		
<b>Road Type:</b>	Single carriageway		
<b>Junction Control:</b>	Not Applicable		



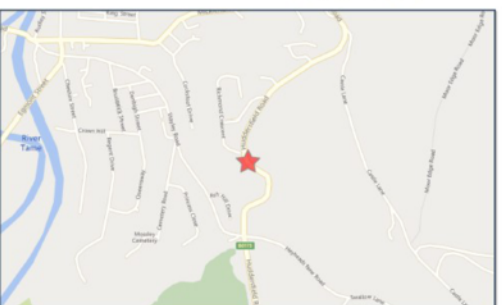

crashmap.co.uk

Validated Data


<b>Crash Date:</b>	Saturday, September 07, 2019	<b>Time of Crash:</b> 9:40:00 PM	<b>Crash Reference:</b> 201906G161475
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<b>Highest Injury Severity:</b>	Serious	<b>Road Number:</b> B6175	<b>Number of Casualties:</b> 3
<b>Highway Authority:</b>	Tameside		<b>Number of Vehicles:</b> 2
<b>Local Authority:</b>	Tameside Metropolitan Borough		<b>OS Grid Reference:</b> 398219 401648
<b>Weather Description:</b>	Fine without high winds		
<b>Road Surface Description:</b>	Dry		
<b>Speed Limit:</b>	30		
<b>Light Conditions:</b>	Darkness: street lights present and lit		
<b>Carriageway Hazards:</b>	None		
<b>Junction Detail:</b>	Not at or within 20 metres of junction		
<b>Junction Pedestrian Crossing:</b>	No physical crossing facility within 50 metres		
<b>Road Type:</b>	Single carriageway		
<b>Junction Control:</b>	Not Applicable		



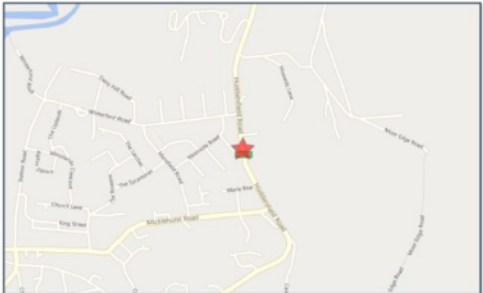




**crashmap.co.uk**

**Validated Data**

<b>Crash Date:</b>	Tuesday, June 29, 2021	<b>Time of Crash:</b>	9:55:00 PM	<b>Crash Reference:</b>	2021061069195
<b>Highest Injury Severity:</b>	Serious	<b>Road Number:</b>	B6175	<b>Number of Casualties:</b>	4
<b>Highway Authority:</b>	Tameside	<b>Number of Vehicles:</b>	2	<b>OS Grid Reference:</b>	398350 402250
<b>Local Authority:</b>	Tameside Metropolitan Borough	<b>Weather Description:</b>	Fine without high winds		
<b>Weather Description:</b>	Fine without high winds	<b>Road Surface Description:</b>	Dry		
<b>Road Surface Description:</b>	Dry	<b>Speed Limit:</b>	30		
<b>Speed Limit:</b>	30	<b>Light Conditions:</b>	Daylight: regardless of presence of streetlights		
<b>Light Conditions:</b>	Daylight: regardless of presence of streetlights	<b>Carriageway Hazards:</b>	None		
<b>Carriageway Hazards:</b>	None	<b>Junction Detail:</b>	Not at or within 20 metres of junction		
<b>Junction Detail:</b>	Not at or within 20 metres of junction	<b>Junction Pedestrian Crossing:</b>	No physical crossing facility within 50 metres		
<b>Junction Pedestrian Crossing:</b>	No physical crossing facility within 50 metres	<b>Road Type:</b>	Single carriageway		
<b>Road Type:</b>	Single carriageway	<b>Junction Control:</b>	Not Applicable		
<b>Junction Control:</b>	Not Applicable				



*Crashmap accident data*

**Summary**

The following conclusions have been drawn with regards to the proposed licensing application:-

- Existing parking at the site is inadequate to serve a licensed premises.
- Should the VML premises license be granted there would be a dangerous increase in parking on adjacent public highway in a precarious location which is already saturated through gym parking. This would inevitably compromise the safety of vehicles and pedestrians as licensed premises visitors occupy vital footpath space with parked vehicles, forcing pedestrians into public highway in advance of a tight bend with poor forward visibility.
- The existing access is dangerous and sub-standard in terms of visibility, this situation will be made more hazardous by the increased number of trips generated by licensed premises use.

I would ask that my details be redacted in any copy or discussion of this letter made public.

Yours faithfully- [Redacted Signature]





EXAMPLE OF PARKING OVERSPILL ONTO PUBLIC HIGHWAY  
TUE 11TH JULY 18.25HRS



EXAMPLE OF PARKING OVERSPILL ONTO PUBLIC HIGHWAY  
WED 12TH JULY 20.01HRS



EXAMPLE OF PARKING OVERSPILL ONTO PUBLIC HIGHWAY  
THU 13TH JULY 18.52HRS



NORTH SOUTH AERIAL VIEW



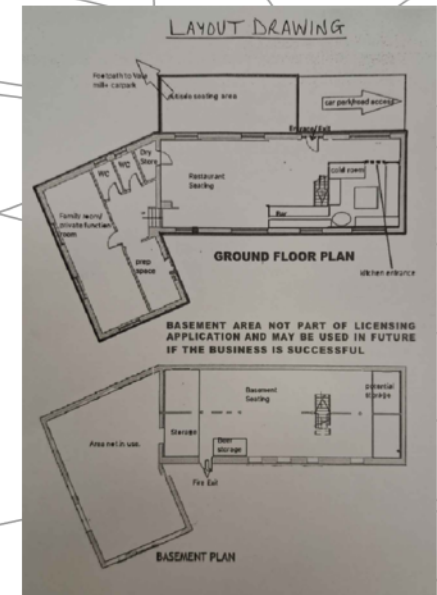
TITLE PLAN: GM876196



ADORTED HIGHWAY PLAN

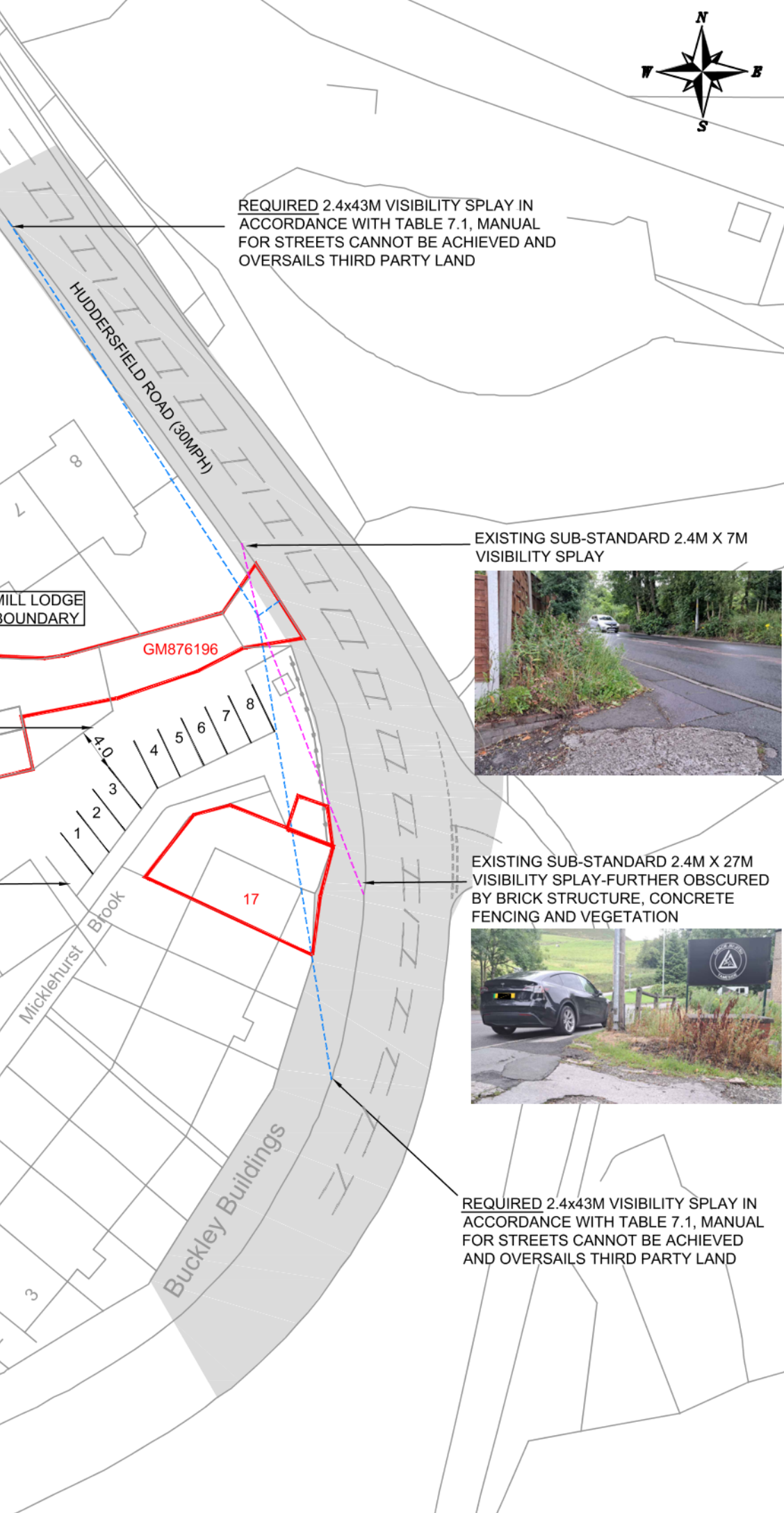
INADEQUATE AISLE WIDTH OF 4.0M BETWEEN EXISTING RETAINING WALL AND PROPOSED PARKING SPACES

8 POTENTIAL PARKING SPACES 2.4M X 4.8M ON ROUGH UNMADE GROUND OCCUPIED MON, TUE, WED, THU EVENINGS AND SAT MORNINGS BY GYM USE WITH PARKING ON ADJACENT PUBLIC HIGHWAY



VALE MILL LODGE LAND BOUNDARY

GRACIE JIU JITSU GYMNASIUM



REQUIRED 2.4x43M VISIBILITY SPLAY IN ACCORDANCE WITH TABLE 7.1, MANUAL FOR STREETS CANNOT BE ACHIEVED AND OVERSAILS THIRD PARTY LAND

EXISTING SUB-STANDARD 2.4M X 7M VISIBILITY SPLAY



EXISTING SUB-STANDARD 2.4M X 27M VISIBILITY SPLAY-FURTHER OBSCURED BY BRICK STRUCTURE, CONCRETE FENCING AND VEGETATION



REQUIRED 2.4x43M VISIBILITY SPLAY IN ACCORDANCE WITH TABLE 7.1, MANUAL FOR STREETS CANNOT BE ACHIEVED AND OVERSAILS THIRD PARTY LAND



NOTES

- TITLE GM61820
- EXISTING ADOPTED HIGHWAY



EXAMPLE OF MID WEEK PARKING AT CAPACITY  
TUE 11TH JULY 18.26HRS



EXAMPLE OF MID WEEK PARKING AT CAPACITY  
WED 12TH JULY 19.59HRS



EXAMPLE OF MID WEEK PARKING AT CAPACITY  
THU 13TH JULY 18.53HRS

REV	DETAILS	DRAWN	CHECKED	DATE

DRAWING TITLE:  
**VALE LODGE MILL PREMISES LICENSE APPLICATION ACCESS AND PARKING PLAN**

SCALES:  
**1:500 @ A3**

DRAWING NUMBER:  
**VML-01**