

<u>No:</u>	BH2020/02211	<u>Ward:</u>	Westbourne Ward
<u>App Type:</u>	Full Planning		
<u>Address:</u>	Rockwater Kingsway Hove BN3 4FA		
<u>Proposal:</u>	External alterations and extensions including a glazed first floor extension above existing flat roof, new lift to roof terrace from promenade level, glazed pergola extension to north west lower ground floor, booth seating, a fire pit with canopy/chimney and bonded gravel surround to the north east side of the lower ground floor and an area of decking with balustrade to the beach south of the site. (Part Retrospective)		
<u>Officer:</u>	Sam Bethwaite, tel: 292138	<u>Valid Date:</u>	10.08.2020
<u>Con Area:</u>		<u>Expiry Date:</u>	05.10.2020
<u>Listed Building Grade:</u>		<u>EOT:</u>	
<u>Agent:</u>	Lewis And Co Planning SE Ltd Road Brighton BN1 5PD	Lewis & Co Planning	2 Port Hall
<u>Applicant:</u>	Rockwater Group LTD Brighton BN1 5PD	C/o Lewis & Co Planning	2 Port Hall Road

1. RECOMMENDATION

1.1. That the Committee has taken into consideration and agrees with the reasons for the recommendation set out below and resolves to **REFUSE** planning permission for the following reasons:

1. The proposed roof extension and lift by virtue of the additional height would result in an overly prominent building that contrasts starkly with the other seafront buildings in the vicinity. It would be contrary to the identified character of the Western Esplanade and would fail to preserve and enhance the setting of the conservation area. Accordingly, it is considered to be contrary to policies CP12 and CP15 of the Brighton & Hove City Plan Part One and policies QD14 and HE6 of the Brighton and Hove Local Plan (retained policies March 2016).

Informatives:

1. In accordance with the National Planning Policy Framework and Policy SS1 of the Brighton & Hove City Plan Part One the approach to making a decision on this planning application has been to apply the presumption in favour of sustainable development. The Local Planning Authority seeks to approve planning applications which are for sustainable development where possible.
2. This decision is based on the drawings received listed below:

Plan Type	Reference	Version	Date Received
Proposed Drawing	243	C	8 December 2020

Location and block plan	254		10 August 2020
Proposed Drawing	255		10 August 2020
Report/Statement	Design & Access		10 August 2020
Report/Statement	Transport Assessment		10 August 2020
Report/Statement	Heritage Statement		10 August 2020
Report/Statement	Sustainability Appraisal		10 August 2020

3. The application has been referred to the Planning Committee by the Head of Planning due to the level of public interest.

2. SITE LOCATION & APPLICATION DESCRIPTION

- 2.1. The application relates to the detached café/bar building formerly known as ‘the View’, now ‘Rockwater’, with dual frontages onto the seafront promenade to the south, and the locally listed Western Lawns to the north. Given the change in levels from the south down to the north, it presents as single storey to the former and as two storey to the latter. The subject building is located at the southern edge of Kingsway (A259) opposite Walsingham Road.
- 2.2. The site is located within the Sackville Gardens Conservation Area, but is not subject to an Article 4 direction, nor is it a listed building or in the vicinity of any. The site is also within an Archaeological Notification Area.
- 2.3. The current application seeks permission for a glazed extension with a dark, powder-coated aluminium frame across the width of the existing flat roof, but set back approximately 3.6m from the southern edge.
- 2.4. In addition, a single storey, glazed, timber-framed, pergola extension with a polycarbonate roof is also proposed to the north elevation at lower ground floor level. Adjacent this would be a fire pit with bonded gravel surround and booth seating. To the east elevation a lift is proposed at promenade level to provide access to the roof terrace.
- 2.5. The application description was altered during the consideration of this application to include a timber deck seating area with glass balustrade facing the beach, directly south of the main building. The description was also changed to reference the part retrospective nature of the development, as elements of the timber deck and the proposed roof structure are in place, though this is not a material consideration in determining the application.
- 2.6. The proposed drawings incorporate previously-approved changes to the external finishes of the main building, a roof terrace enclosed with a glass balustrade and parapet wall, and a single storey flat roof extension to the east elevation with ventilation and extraction equipment above behind a timber screen. These alterations were recently granted permission under a previous application (BH2020/00612) and so have not been considered under this current application.

- 2.7. Other works have been undertaken on site without the benefit of planning permission, notably the creation of two glazed sections of the new single-storey extension, at the western and eastern end of the roof terrace.

3. RELEVANT HISTORY

- 3.1. PRE2019/00203 - The construction of a flat-roofed extension to the south part of the existing roof, the erection of balustrading around the existing flat roof to provide a terrace and a balcony at first floor level to the north elevation. The entire building would be repainted or re-clad and new signage is also proposed for the main elevations.

- 3.2. Summary of advice given on 19 November 2019:

- The principle of extending this A3 use is likely to be supported in accordance with wider, spatial objectives;
- However, the scale and nature of the proposed roof terrace and related alterations would cause significant harm to the character and appearance of the Sackville Gardens Conservation Area and the setting of the locally listed Western Lawns;
- The other elements of the proposal could be considered acceptable subject to further detailing and information, including about inclusivity and accessibility;
- It is considered that there is potential for biodiversity gains / improvements to be achieved through soft landscaping, sedum roofs and green walls; and
- The proposals are not considered to have an impact on neighbouring amenity.

- 3.3. BH2020/00958 - Display of 4no internally-illuminated fascia signage to all elevations. - Approved 26.06.2020

- 3.4. BH2020/00612 - Alterations to restaurant / café (A3) to involve a single storey, lower ground floor extension to the west elevation with fencing above to hide new extraction equipment, including a flue at roof level; installation of glazed balustrade and parapet wall to facilitate a terrace on the roof; re-cladding, painting and fenestration changes to all elevations, including new entrances; a canopy; and a replacement staircase. - Approved 30.04.2020

- Rooftop paraphernalia was conditioned to be positioned where it would not be visible from ground level.
- Customer occupation was limited by condition to 07:00-02:00 internally with no use of external areas associated with the site past 23:00.
- The playing or generation of live or recorded music and the provision of any kind of associated entertainment was conditioned not take place in any external areas associated with the application site.

4. REPRESENTATIONS

- 4.1. (587) letters have been received, supporting the proposed development for the following reasons:
- Positive addition to seafront

- Creates a community hub
 - Well designed, existing building not attractive
 - Local economic benefits and employment opportunities, catalyst for further regeneration
 - Improved infrastructure
 - Unique for Hove
 - Useable in all weather conditions
- 4.2. (38) letters have been received, objecting to the proposed development for the following reasons:
- Inappropriate height, out of keeping, overdevelopment
 - Restriction of sea front views
 - Light pollution and noise disturbance
 - Adverse impact on the conservation area
 - Overlooking of people using the beach
 - Increased parking pressure
 - Impact of late night opening and the noise disturbance to nearby residential streets when patrons leave the premises
- 4.3. (3) letters have been received, commenting on the proposed development for the following reasons:
- Noise from the venue can be heard a long way from the site
 - The expansion of the site is positive
- 4.4. Peter Kyle MP has written in support of this application for the following reasons:
- Year-round use of the site
 - Improved accessibility
 - A positive addition for local residents
- 4.5. Hove Civic Society has written in support of this application for the following reasons:
- Catalyst for regeneration of this section of the seafront
 - Increased employment and recreational and community activities
 - Improve the appearance of the site
 - No negative impact on the conservation area
- 4.6. West Hove Seafront Action Group have written in support of this application for the following reasons:
- Increased footfall and the associated benefit for local businesses
 - Additional security and waste management welcomed
 - Complementary provision of community facilities
 - Fully realises the potential of the site
 - Year-round usability
 - Additional employment opportunity

5. CONSULTATIONS

- 5.1. **Brighton and Hove Archaeology Society:** No objection Unaware of any archaeological deposits likely to be affected by this development.
- 5.2. **County Archaeology:** No objection Do not believe that any significant archaeological remains are likely to be affected by proposals.
- 5.3. **Conservation Advisory Group** Objection Additional height unprecedented along this stretch of the seafront, buildings built deliberately low according to the conservation area character statement to provide views of the beach and beach huts. Design in general poor, development directly on the beach harms the beachscape.
- 5.4. **Environmental Health:** No Comment No comments were received relating directly to the proposal, but confirmed noise assessment not required as control exercised under the Licensing Act 2003 and the Environmental Protection Act 1990.
- 5.5. **Heritage:** Objection Note Sackville Gardens Conservation Area Character Statement states Western Esplanade buildings "were built deliberately low to allow views of the beach and beach huts beyond". Application site already largest of these buildings, roof top extension would be unduly prominent in both directions along Esplanade and Kingsway, and from residential properties to north. Would harm open character of this aspect of the conservation area. Harm from rooftop extension considered less than substantial, but with no heritage benefits to be weighed against it. Extension to north of site would encroach into open space of Locally Listed Lawns, but given scale of Lawns would be a small proportion and not be visible until relatively close to the site. No heritage objection to this aspect.
- 5.6. **Seafront Team** No Objection Supportive in principle, of the investment in the site, and quality of design. Note access needs to be retained for City Parks to maintain public gardens to north; seating on the promenade should not extend more than 2.3m from the front of the building as per site's patio licence; concern over potential noise disturbance, could contradict of the tenant's covenant in lease [NB: this is beyond the planning process].
- 5.7. **Sustainable Transport:** No objection Additional cycle parking requested. Disabled parking arrangement acceptable given the location, on-street bays as well as the parking opportunities afforded to blue badge holders. Service and delivery facilities acceptable. Reduction in on site parking to zero is acceptable given the parking controls and facilities in vicinity of site. No significant increase in trips anticipated over approved application BH2020/00612.
- 5.8. **Sussex Police Community Safety** Objection Outside seating areas and decked area likely to attract anti-social behaviour and other associated criminal activities and as such are a potential burden to existing police resources.

6. MATERIAL CONSIDERATIONS

- 6.1. In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, this decision has been taken having regard to the policies and proposals in the National Planning Policy Framework, the Development Plan, and all other material planning considerations identified in the "Considerations and Assessment" section of the report
- 6.2. The development plan is:
- Brighton & Hove City Plan Part One (adopted March 2016)
 - Brighton & Hove Local Plan 2005 (retained policies March 2016);
 - East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (adopted February 2013);
 - East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (adopted February 2017);
 - Shoreham Harbour JAAP (adopted October 2019).
- 6.3. Due weight has been given to the relevant retained policies in the Brighton & Hove Local Plan 2005 according to their degree of consistency with the NPPF.

7. POLICIES

The National Planning Policy Framework (NPPF)

Brighton & Hove City Plan Part Two

Policies in the Proposed Submission City Plan Part 2 do not carry full statutory weight but are gathering weight as the Plan proceeds through its stages. They provide an indication of the direction of future policy. Since 23 April 2020, when the Plan was agreed for submission to the Secretary of State, it has gained weight for the determination of planning applications but any greater weight to be given to individual policies will need to await the outcome of the Regulation 19 consultation which was undertaken to 30 October 2020.

Brighton & Hove City Plan Part One

SA1	The Seafront
SA6	Sustainable Neighbourhoods
SS1	Presumption in Favour of Sustainable Development
CP2	Sustainable economic development
CP5	Culture and tourism
CP6	Visitor accommodation
CP10	Biodiversity
CP12	Urban design
CP13	Public streets and spaces
CP15	Heritage

Brighton and Hove Local Plan (retained policies March 2016):

TR14	Cycle access and parking
QD5	Design - street frontages
QD10	Shopfronts
QD11	Blinds
QD14	Extensions and alterations

QD15	Landscape design
QD27	Protection of amenity
SR12	Large Use Class A3 (restaurants and cafes) and Use Class A4 (pubs and bars)
HE6	Development within or affecting the setting of conservation areas
HE10	Buildings of local interest

Supplementary Planning Documents:

SPD02	Shop Front Design
SPD11	Nature Conservation & Development
SPD12	Design Guide for Extensions and Alterations
SPD14	Parking Standards

8. CONSIDERATIONS & ASSESSMENT

- 8.1. The main considerations in the determination of this application relate to the principle of the development, the impact on heritage assets and neighbouring amenity.

Planning Policy:

- 8.2. The site falls within the Seafront Special Area where the Council will work in partnership to ensure the on-going regeneration and maintenance of the seafront in an integrated and coordinated manner. One of the main aims of City Plan Part One Policy SA1 is to support the year-round sport, leisure and cultural role of the seafront, while Part A of SA1 outlines the priorities for the seafront as a whole, which largely revolve around complementing its outstanding historic setting and natural landscape value, enhancing biodiversity, improving the public realm and promoting high quality architecture. It is considered that the proposed development accords with these broad aims.
- 8.3. City Plan Part One Policy CP5 applies to this proposal since this building is categorised as an existing visitor facility, and this policy supports their retention, upgrading and enhancement in order to meet changing consumer demands.
- 8.4. Local Plan Policy SR12 sets out the criteria required to be met for an extension to A3/A4 uses (now Class E/Sui Generis under the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020) to be acceptable, namely being more than 400m from another establishment with a total public floorspace of 150m² or more; not operating within, or abutting, residential premises; not causing noise nuisance or an increase in disturbance to nearby residents; and with regard to parking and public transport facilities, not creating public order issues when people disperse to transport and other destinations.
- 8.5. The site is a detached building that is not within a residential setting. The closest residential properties are more than 70m from the proposed development, on the opposite side of the A259. The site is not close to any significant public transport or parking facilities, given its location outside the city centre. The nearest bus stop is serviced by one route only. Lex's Café approximately 295m to the east is within the defined radius for separation. It is unclear if this venue

has a public floorspace in excess of 150m². It is noted that SR12 was largely introduced to deal with large numbers of people dispersing at the same time from the areas containing bars and clubs in the city centre. On that basis, Officers consider the proposal is likely to be compliant with the aims of SR12.

- 8.6. It is therefore concluded that the proposed extension of this site is supported in principle. Additionally, it is in accordance with City Plan Part One Strategic Objective SO17 that aims to enhance the seafront as a year-round place for sustainable tourism, leisure, recreation and culture.

Design and Appearance:

- 8.7. The scheme that was approved at the end of April 2020 maintained the same height (7m) as the existing structure, but enabled the roof to be used as an open terrace, enclosed with a 1.1m balustrade. It also included a single storey, lower ground floor extension to the west elevation with fencing above to hide new extraction equipment, including a flue at roof level. The recladding of the exterior also added a little to the overall depth of the building when seen from the east/west.
- 8.8. The current application proposes to increase the building height to 9.8m, as well as adding a significant expansion at lower ground floor level which would more than double the lower ground floor footprint. The following considers the acceptability of each of these factors.

Building Height

- 8.9. When considering whether to grant planning permission for development in a conservation area the Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of the area.
- 8.10. Case law has held that the desirability of preserving or enhancing the character or appearance of a conservation area must be given "considerable importance and weight".
- 8.11. The Character Statement for this conservation area states that the Western Esplanade is "devoted to the public enjoyment of fresh air and the seaside atmosphere. The grounds of the croquet lawn, bowling greens, and pleasure gardens have a traditional appeal and are well used by the public. There are several communal buildings dating mostly from the 1930's which have been built deliberately low to allow views to the beach and beach huts beyond."
- 8.12. Although one of several low-level brick buildings, the application site is more prominent in views, particularly from the north, than the others due to its large footprint, relative to other buildings in the immediate area, and second storey. The additional height that would be created by the proposed roof extension and lift would add to the prominence of the building, as is evident from existing additions made to the building (without planning permission). These enclose the stairways up to the roof, and are the same height and depth as the proposed roof extension would be, but also infilling the area between.

- 8.13. It is therefore considered that the proposed roof extension and lift would be harmful to the open character of the southern end of the conservation area. The stark contrast in height and scale from the other buildings along the seafront would result in the site appearing overly dominant, and disrupting the long views along the Lawns from the Esplanade, Kingsway as well as the southern end of the residential streets to the north, and drawing the eye. The activity at roof level associated with the use of the proposed roof structure would further attract attention and exacerbate the site's prominence.
- 8.14. The LPA has discouraged additional height at this site at the pre-application stage, and subsequently controlled the use of the roof via condition to limit its visibility in the approval of application BH2020/00612 in April 2020. The current application does not follow the recommended direction for development at this site.
- 8.15. The harm caused to the heritage asset of the Sackville Gardens Conservation Area is less than substantial under the terms of the NPPF but nevertheless this must be given great weight. The public benefits of the improvements to the facilities and access of this tourist and visitor facility and the additional employment opportunities are acknowledged. However, a significant proportion of any such benefits are already available from the scheme which the Council approved in April 2020 and therefore the benefits that can reasonably be attributed to the additional development sought through the current application will be proportionately limited.
- 8.16. The proposed roof extension and lift by virtue of the additional height would result in the application site appearing as an overly prominent building that contrasts starkly with the other seafront buildings in the vicinity. It would be contrary to the identified character of the Western Esplanade and would fail to preserve and enhance the setting of the conservation area.
- 8.17. The proposed roof extension and lift have been identified as being detrimental to the character and appearance of the Sackville Gardens Conservation Area. In this instance the public benefits do not outweigh the harm caused. Accordingly, these aspects of the proposal are considered to be contrary to policies CP12 and CP15 of the Brighton & Hove City Plan Part One and policies QD14 and HE6 of the Brighton and Hove Local Plan (retained policies March 2016).

Building Footprint

- 8.18. The proposed extension at lower ground floor level to the north of the site is significant in scale but unlike the proposed roof extension, would not have a significant impact on views across the southern end of the conservation area. The area to the north of the site has a lower ground level than the lawns to the east of the site, and also sits below the level of Kingsway (A259) and its footpaths, as well as the Esplanade. The proposed extension in this area would not therefore be prominent in views from these locations until relatively near to the site.

- 8.19. The proposed lower ground floor extension would project into the open space of the locally listed heritage asset known as the Western Lawns and Hove Lagoon and erode the open character. However, given the scale of the locally listed heritage asset and the limited prominence of the proposed extension the harm is considered to be insignificant and does not warrant refusal of this application.
- 8.20. It is noted that there is some inconsistency in the appearance of the decking to the beach in front of the application site. This is shown on the proposed plans as a deck with a metal handrail with toughened glass infill panels. The supplied visuals of the deck show it with Corten steel planters and shingle gabions. During a site visit it was seen that the deck had been installed and that it had timber booth seating and temporary benches and no metal and glass balustrade. The deck as shown on the proposed drawing has been assessed as part of this application. The design and scale of the deck are considered appropriate. The simple appearance would prevent the deck from jarring with the site and the wider beach scape and would be secured by condition. Subject to this, this element of the development is considered acceptable.

Impact on Amenity:

- 8.21. Policy QD27 of the Brighton & Hove Local Plan states that planning permission for any development or change of use will not be granted where it would cause material nuisance and loss of amenity to the proposed, existing and/or adjacent users, residents, occupiers or where it is liable to be detrimental to human health.
- 8.22. The main amenity concerns are noise generation from the venue and patrons leaving the site. The application site is detached from all other premises and is in excess of 70m from the nearest residential properties. The previous application BH2020/00612 conditioned the hours of use of the site and of the outside space where it restricted the playing of live and recorded music from the outside areas. Were this application to be approved it could be conditioned in a similar manner and this would mitigate the potential for noise disturbance from the site.
- 8.23. The Council's Environmental Health Team have not objected to the application and did not request extra information to assess amenity impacts arising from noise generation. They referenced the controls that exist under the Licensing Act 2003 and the Environmental protection Act 1990 that run alongside planning and provide adequate protection for local residence.
- 8.24. The application site is bordered by the heavily used pedestrianised Esplanade to the south and busy main road of Kingsway (A259) to the north. During the day and into the evening the impact of patrons leaving the site is unlikely to have a noticeable impact on the surrounding residential properties.
- 8.25. The application site is not surrounded by other venues of a similar nature and it is not considered that the number of people leaving the site when it closes will have a significant impact on the residents of the properties to the north of the site. The transport report submitted with the application states that despite the extensions the proposed capacity will remain at 400 as it was under the previously approved application BH2020/00612. Of these 400 patrons, on any

given night only a limited number of would be likely to walk north via Sackville Gardens, Walsingham Road or Carlisle Road to get to New Church Road.

- 8.26. On this basis, the impact on local amenity through increased noise and disturbance is considered to be acceptable.

Sustainable Transport:

- 8.27. The Local Highway Authority (LHA) consider the impacts of the proposed development acceptable subject to the inclusion of cycle parking that could be secured by condition. This would be in addition to the cycle parking secured by condition on application BH2020/00612 and would reflect the increase in floorspace proposed.

- 8.28. Vehicle access to the site would not be altered by the proposed development. The existing car parking spaces would be lost as a result of the proposed extension to the north of the site. The LHA consider this acceptable with the potential overspill of car parking on the surrounding roads covered by the existing Controlled Parking Zone (CPZ).

- 8.29. The retained space for deliveries is considered acceptable with a vehicle swept path analysis provided for the expected size of vehicle to visit the site. Adequate space exists on the access road should different deliveries overlap.

- 8.30. The loss of disabled parking on site is considered acceptable in this instance. The LHA have stated that the local on street disabled parking bays and dispensation for Blue Badge holders to park where it is safe to do so on double yellow lines for up to three hours can provide adequate parking facilities and accommodate this loss.

- 8.31. Vehicle trip generation is not forecast to increase significantly above the levels identified in application BH2020/00612. As a result, the impact on the carriageways will be minimal and within their capacity.

Sustainability:

- 8.32. A sustainability statement has been provided with the application that documents the ways in which various waste streams such as General Waste, Mixed Recycling, Card, Glass, Food and Coffee Grounds would be recycled or dealt with locally in the most sustainable ways.

- 8.33. The Design and Access Statement submitted confirms that where possible, recycled and reclaimed materials will be used, and that energy efficiency has been considered in the choice of windows, level of building insulation and the finish of the roof. These matters could be secured by condition.

Other Considerations:

- 8.34. Sussex Police have commented that the proposed arrangement of external seating is easily assessible out of hours and could result in anti-social behaviour and other criminal activities that increase the burden on the local police force. Were this application to be recommended for approval a management plan

could be secured by condition to put measures in place to tackle the issues identified.

- 8.35. The Seafront Team raised a concern that some elements of the proposed work could result in a nuisance, annoyance or disturbance to nearby residential properties and that this would be contrary to a covenant in the lease of the site. The impacts of the proposed works have been assessed with regard to the material planning considerations. Any controls in place as part of the lease of the site would be a separate matter for the Seafront Team to address.

9. CONCLUSION

- 9.1. The principle of regenerating the property and improving the overall range of attractions on the seafront is supported. Similarly, the benefits which such works would bring to the site and wider area are not disputed. Indeed, the Local Planning Authority has worked proactively in approving a previous refurbishment/extension to the property in April 2020 and providing clear pre-application advice on what was considered appropriate to help meet these objectives. Furthermore, the applicants have been encouraged to amend the current scheme and omit the harmful elements and allow a revised application for the lower ground floor extension to be approved.
- 9.2. However, the property is in a sensitive location and the potential harm such works could have to the overall character and appearance of the area must be given the weight the legislation and case law requires. The increase in height is considered detrimental and harmful to the conservation area, without benefits outweighing that harm. It is considered that the previous approval struck the right balance between redeveloping the site and protecting the conservation area in which the property sits and from which it benefits. However, as noted above, further work at the lower levels would be possible without harming the conservation area. The previous approval along with the potential lower ground floor extension would provide opportunities and benefits to the local area without harming the conservation area. In this respect there does not appear to be a sufficiently robust reason for allowing the harmful increase in height now sought, and thus any additional benefits of the increased height would not outweigh the harm. Accordingly, the application is recommended for refusal.

10. EQUALITIES

- 10.1. The proposed lift provides level access to the roof from the promenade. The public benefit of the increase in accessibility was not considered to outweigh the harm caused to the identified heritage asset of the Saville Gardens Conservation Area.
- 10.2. The lower ground floor has level access from the north via a ramp. This floor has a Disability Discrimination Act (DDA) compliant toilet proposed. There is no internal DDA link to the ground floor. The ground floor has level access provided via a ramp to the south of the site and a platform lift. There is no DDA toilet

proposed on this floor. Were this application to be recommended for approval the absence of this facility would be addressed as the distance to travel from the south of the ground floor to the north side of the lower ground floor is significant.

- 10.3. The loss of disabled parking on site has been considered acceptable in this instance. The LHA stated that the local on street disabled parking bays and dispensation for Blue Badge holders to park where it is safe to do so on double yellow lines for up to three hours provides adequate parking facilities and accommodate this loss.

