

MEGARO HOTEL, 23-27 EUSTON ROAD, LONDON NW1 2SD

APPELLANT'S STATEMENT OF CASE ON GROUND (A)

This appeal relates to the presence of multi-coloured mural ("the Mural") painted onto the exterior of an unlisted property known as 23-27 Euston Road, London NW1 2SD ("the Property").

The Hotel is located within the King's Cross Conservation Area ("the Conservation Area").

For the reasons set out elsewhere in this appeal, the Mural does not comprise an advertisement per section 336(1) of the Town and Country Planning Act 1990.

Strictly without prejudice to this, should the Secretary of State conclude that the Mural does in fact comprise an advertisement, it is contended that the Mural is not harmful to amenity of the Conservation Area (or generally) and/or public safety and preserves and enhances the Conservation Area such that it should be authorised and planning permission granted for the change of use of the exterior of the Property.

Evidence will be submitted to demonstrate that the Mural accords with all relevant local and national policies.