

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

APPELLANT'S STATEMENT OF CASE ON GROUND (G)

The 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"). Immediately outside of the hotel is an entrance to the Kings Cross St Pancras Underground Station. This entrance has been installed since the Mural was erected (in February/March 2011).

The local planning authority is the London Borough of Camden ("the Council").

By the terms of the enforcement notice, the Council requires the appellant to '*remove the advertisement [sic] and make good any damage used [sic] to the building caused by the removal of the painted advertisement [sic]...within a period of three months*'.

The removal of the Mural (by painting over – per Ground F – or otherwise) would require the erection of scaffolding on Euston Road and Belgrove Street. This scaffolding would require consents from the Council (as the local highway authority) and (likely) Transport for London. Given the location of the new Underground station entrance (as above) any scaffolding would likely require the closure of the section of pavement on Euston Road immediately outside of the Property and possibly also the station entrance as well.

As such, it is likely that the obtaining of the necessary consents in order to comply with any notice would be complex and likely to involve several statutory parties.

As such, the time given to comply with the notice is too short. If it is considered that the notice should be upheld, the notice should be varied to allow for a period of twelve months for compliance.