

OBJ/12



The Secretary of State for Transport  
c/o Transport and Works Act Orders Unit  
Department for Transport  
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London SW1P 4DR

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23 January 2017

**Our ref: ARHE/BEHU/U0002664**

**Your ref:**

Dear Sirs

**The Proposed Midland Metro (Wednesbury to Brierley Hill Land Acquisition) Transport and Works Act (TWA) Order  
Unit L (16a Lower Mall) and Unit L16 (Former Post Office) Merry Hill Shopping Centre,  
Brierley Hill**

We are instructed by Done Brothers (Cash Betting) Limited ("our Client"), which occupies and trades from the above mentioned units ("the Units") as a Betfred betting office.

Our Client has instructed us to submit a formal objection to the above mentioned order ("the Order") on the following grounds:

1. It appears that our Client's interests in the Units are not proposed to be compulsorily acquired but that land will be acquired and construction works undertaken close to the Units.
2. In those circumstances there is very clear potential for a substantial adverse impact on our client's ability to operate its business from the Units.
3. Accordingly we request that the Order should not be made, and that the proposed works should not be carried out consequent upon the making of the Order, unless a firm undertaking is given to our client that measures will be put in place and implemented to ensure that:
  - (i) Vehicular access to and egress from the Units along The Embankment is maintained at all times both during and following completion of the proposed work;
  - (ii) Interference to our Client's business by way of noise, dust, vibration and other matters is avoided or kept to the minimum reasonably possible;
  - (iii) Customer access is maintained to the front of the Units during the time of the works as provided under the Order;
  - (iv) Our Client is provided with advance warning of any disruptive work that the West Midlands Combined Authority will carry out in close proximity to the Units; and
  - (v) Regular updates and communication are provided to our Client on the upcoming works and likely impacts to business and customers of our Client at the Units.

We should be grateful if you would kindly acknowledge receipt of this letter.

Yours faithfully



**Adam Rhead**  
**For Gerald Eve LLP**

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