

i) Statement of: Paul Brown
ii) Statement No: 20
iii) For: Claimants
iv) Dated: 26 April 2024
v) Exhibits: PB20A – PB20I

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO: KB-2022-BHM000188

B E T W E E N:

- (1) WOLVERHAMPTON CITY COUNCIL**
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL**
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL**
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

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- (5) Mr ANTHONY GALE**
- (6) Miss WIKTORIA SZCZUBLINSKA**
- (7) Mr ISA IQBAL**
- (8) Mr MASON PHELPS**
- (9) Ms REBECCA RICHOLD**

Defendants

AFFIDAVIT AND WITNESS STATEMENT OF PAUL BROWN (COMMUNICATIONS MANAGER, WOLVERHAMPTON CITY COUNCIL) 26 APRIL 2024 REGARDING CLAIMANTS' COMPLIANCE WITH DIRECTIONS ORDER 27 FEBRUARY 2024

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Affidavit, Statement and Exhibits

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- (8) Mr MASON PHELPS**
- (9) Ms REBECCA RICHOLD**

Defendants

THIRD AFFIDAVIT OF PAUL BROWN

I, PAUL STEVEN BROWN, of Wolverhampton City Council, St Peter's Square, Wolverhampton, WV1 1RG MAKE OATH and say as follows:

1. Except where indicated to the contrary, the facts in this affidavit are within my knowledge and are true. Where the facts in this affidavit are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief. This is my third affidavit in these proceedings.

2. My first affidavit was filed in relation to the committal applications against the 5th to 7th Defendants heard October and November 2023 and detailed various service steps in relation to the interim injunction in force at the time.
3. My second affidavit was filed in an effort to detail to the Court how the Claimants contend they have complied with the Service requirements in the directions order made by the Honourable Mr Justice Julian Knowles on 27 February 2024. Since making my second affidavit, by order of 22 April 2024, the honourable court has sought clarification of the information contained in my second affidavit and ordered a further affidavit be filed clarifying the issues in my second affidavit. I understand the Claimants are required to file this further affidavit by 4.00 p.m. on Monday 29 April 2024.
4. I therefore make this affidavit in an effort to assist the court and trust this will provide the honourable court with the clarification it seeks.
5. The City of Wolverhampton Council is the authority which is leading the joint application of the Councils of Wolverhampton, Dudley, Sandwell and Walsall (hereinafter referred to as the "Black Country Boroughs") seeking injunctive relief to restrain street racing (also referred to as car cruising) in the Black Country Boroughs.
6. I have been employed since 25 June 2007 as a Senior Communications Adviser and latterly Communications Manager in the communications team of the City of Wolverhampton Council. I confirm, for the avoidance of any doubt, I make this affidavit on behalf of all four Claimant Councils – Wolverhampton, Dudley, Sandwell and Walsall Councils.
7. In collaboration with my colleagues Pardip Nagra (ASB Team Leader) and Adam Sheen (Senior Solicitor, Legal Services) a communications plan has been developed, with the initial steps implemented, initially to raise awareness of the application to the High Court for an interim street racing injunction for the Black Country Area and, should the court be minded to grant this, to promote the existence of the injunction, and the power of arrest, once it is formally in place.
8. Recognising this is a joint enterprise, I have been liaising closely with my counterparts in the communications teams of Dudley, Sandwell and Walsall Councils and West Midlands Police.

9. I was present in court at the hearing of the Black Country Car Cruising/Street Racing Injunction 27 February 2024 and was subsequently provided with a copy of the sealed orders (namely the injunction, power of arrest and directions order) made by the Honourable Mr Justice Julian Knowles at that hearing. The Order of the Honourable Mr Justice Julian Knowles required a series of service steps to be undertaken to effect service of various documents named in the order. I respectfully contend that the four Black Country Claimant Councils, (Dudley, Sandwell, Walsall and Wolverhampton) dutifully fully complied with the service requirements within the order of the Honourable Mr Justice Julian Knowles dated 27 February 2024 and well within the deadlines for compliance.
10. On 26 April 2024 I made a witness statement in the substantive injunction application (my twentieth witness statement within these proceedings) in which I detailed the steps the four Claimant Councils had taken to comply with the service requirements stipulated within the order of the Honourable Mr Justice Julian Knowles dated 27 February 2024. I attach a copy of this statement hereto (my twentieth statement, together with the exhibits referred to therein ("Exhibit PB20A – EXHIBIT 20I"), marked as "Exhibit PB4") for ease of reference.

SWORN AT Wolverhampton County Court
this 26th day of APRIL 2024



Before me,



an Officer of the Court

OFFICER OF THE COURT
APPOINTED BY THE JUDGE
TO TAKE AFFIDAVITS
PURSUANT TO SECTION 58 OF
THE COUNTY COURT ACT 1984

B E T W E E N:

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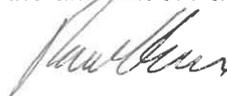
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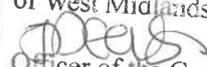
Defendants

EXHIBIT PB4

This is the document referred to as "EXHIBIT ~~PB3~~" in the affidavit of Paul Brown sworn 26 APRIL 2024.

PB4



This is the exhibit referred to as
PB4 In the attached affidavit
Sworn before me this 26th
day of APRIL 2024
at Wolverhampton in the County
of West Midlands

Officer of the Court
Appointed to swear affidavits

EXHIBIT

P B 4

Statement of:	Paul Brown
Statement no:	20
For:	Claimants
Date:	26 April 2024
Exhibits:	PB20A – PB20I

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Defendants

TWENTIETH WITNESS STATEMENT OF PAUL STEVEN BROWN

I, PAUL STEVEN BROWN of the City of Wolverhampton Council, Civic Centre, St Peter's Square, Wolverhampton, WV1 1RG WILL SAY AS FOLLOWS:

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief. This is my 20th statement in these proceedings and is an update of my 19th statement to clarify a few matters for the court.
2. The City of Wolverhampton Council is the authority which is leading the joint application of the Councils of Wolverhampton, Dudley, Sandwell and Walsall (hereinafter referred to as the "Black Country Boroughs") seeking injunctive relief to restrain street racing (also referred to as car cruising) in the Black Country Boroughs. This is a statement on behalf of all four Claimants.
3. I have been employed since 25 June 2007 as a Senior Communications Adviser and latterly Communications Manager in the communications team of the City of Wolverhampton Council.
4. In collaboration with my colleagues Pardip Nagra (ASB Team Leader) and Adam Sheen (Senior Solicitor, Legal Services) a communications plan has been developed, initially to raise awareness of the application to the High Court for an interim street racing injunction for the Black Country Area and, after this was granted, to promote the existence of the injunction and the Power of Arrest which is in place.
5. Recognising this is a joint enterprise, I have been liaising closely with my counterparts in the communications teams of Dudley, Sandwell and Walsall Councils and West Midlands Police. The order of the High Court made by Mr Justice Julian Knowles on 27 February 2024 required the Claimants to complete a series of steps before 16:00 on 15 March 2024 to publicise the outcome of the hearing and bring it to the attention of "Persons Unknown".

6. The information below details these steps and how, I respectfully suggest, the Claimant Councils have fulfilled these steps. For ease of reference, the Court may wish to refer to the following table when considering the Claimants' purported compliance with the order of the Honourable Mr Justice Julian Knowles of 27 February 2024:

No.	Required publicity step	Paragraphs in witness statement	Exhibit
1	Media release (paragraph 5(a) directions order 27.02.2024)	9 – 11	Exhibit PB20A
2	Social media (paragraph 5(b) and 7(b) directions order 27.02.2024)	12 – 15	Exhibit PB20B
3	Updating dedicated webpages (paragraphs 5(c) and 7(a) directions order 27.02.2024)	16 – 19	Exhibit PB20C
4	Updating Claimants' homepages (paragraph 5(d) directions order 27.02.2024)	20 – 21	Exhibit PB20D
5	Placing bundles at front desks (paragraphs 5(e) and 7(c) directions order 27.02.2024)	22 – 24	Exhibit PB20E
6	Physical and digital signage (paragraph 5(f) directions order 27.02.2024)	25 – 39	Exhibit PB20F
7	Publicity request to police forces (paragraph 5(g) directions order 27.02.2024)	40 – 41	Exhibit PB20G
8	Serving Orders on Named Defendants (paragraphs 6 and 9 directions order 27.02.2024)	42 – 43	Exhibit PB20H

7. The Claimants will say all the directions within paragraphs 5, 6, 7 and 9 of the directions order made by the Honourable Mr Justice Julian Knowles on 27 February 2024 (“the Directions Order”) were complied with in good time before the deadline for compliance stipulated within those directions. For ease of reference, I set out in table form below the service directions, the deadlines for compliance and the dates on which the Claimants purport to have complied with the service steps stipulated within the Directions Order.

No.	Required publicity step	Deadline for Compliance with required publicity step specified within the Directions Order	Stated Date of Claimants' Compliance
1	Media release (paragraph 5(a) directions order 27.02.2024)	4.00 p.m. 15 March 2024	28 February 2024
2	Social media (paragraph 5(b) and 7(b) directions order 27.02.2024)	4.00 p.m. 15 March 2024	28 February 2024 (Paragraph 5(b)) 1 March 2024 (Paragraph 7(b))
3	Updating dedicated webpages (paragraphs 5(c) and 7(a) directions order 27.02.2024)	4.00 p.m. 15 March 2024	Initial update: 1 March 2024 Update with all required documentation: 1 March 2024 (Wolverhampton & Sandwell) 11 March (Walsall) 13 March (Dudley)
4	Updating Claimants' homepages (paragraph 5(d) directions order 27.02.2024)	4.00 p.m. 15 March 2024	29 February 2024 and ongoing
5	Placing bundles at front desks (paragraphs 5(e) and 7(c) directions order 27.02.2024)	4.00 p.m. 12 March 2024	1 March 2024 (Wolverhampton, Sandwell & Walsall) 12 March 2024 (Dudley)
6	Physical and digital signage (paragraph 5(f) directions order 27.02.2024)	12.01 a.m. 15 March 2024	00:01 hours (12.01 a.m.) on 28 February 2024
7	Publicity request to police forces (paragraph 5(g) directions order 27.02.2024)	4.00 p.m. 15 March 2024	29 February 2024
8	Serving Orders on Named Defendants (paragraphs 6 and 9 directions order 27.02.2024)	4.00 p.m. 15 March 2024	1 March 2024

8. I detail below the requirements of each service step required in the Directions Order together with details of how the Claimants purport to have complied with each of those service steps and the dates the Claimants claim to have complied with each service step (and, where it is not immediately clear, I detail how the Claimants calculated their dates of compliance with the service requirements set out in the Directions Order).

MEDIA RELEASE (paragraph 5(a) of Directions Order)

9. Paragraph 5(a) of the Directions Order required:

(a) Issuing a media release highlighting the grant of a Final Injunction and Power of Arrest, such release must provide:

(i) Details of the application and summarise the orders made;

(ii) Any deadline for filing any documents by the Defendants;

(iii) The date, time and location of any future hearing, if applicable;

(iv) The addresses of the dedicated webpages maintained by the Claimants regarding car cruising;

(v) The Claimants' contact details; and

(vi) Details of where and how copies of the Injunction, Power of Arrest, this Order, the Documents and the Evidence may be obtained.

Such release shall be made to, but is not limited to, local print publications including the Express and Star, Chronicle Week, the Birmingham Mail, Halesowen & Dudley News and Stourbridge News; local radio stations including BBC WM, Free Radio, Signal 107, WCR FM and Heart; the website Birmingham Live (aka) BLive; and the following television stations, BBC (to include the Midlands Today programme) and ITV Central.

10. I can confirm that a media release was issued on 28 February 2024. Please see **Exhibit PB20A attached hereto** which includes the "Media release, issued 28 February 2024". There was extensive coverage in the local print and broadcast media; please see "Express & Star, 28 February 2024, Free Radio, 28 February 2024, BBC News, 28 February 2024, BBC News, 29 February 2024, Halesowen News, 29 February, 2024, BNN, 29 February 2024, Local Government Lawyer, 29 February 2024" in **Exhibit PB20A attached hereto**. There was also coverage on BBC WM, Birmingham Live and other outlets.

11. The media release was also published on the websites of the four claimants. Please see "Media release - City of Wolverhampton Council; Media release – Walsall Council; Media release – Sandwell Council; Media release – Dudley Council" in **Exhibit PB20A attached hereto**.

SOCIAL MEDIA (Paragraphs 5(b) and 7(b) of Directions Order)

12. Paragraph 5(b) of the Directions Order required Placing on the Claimants' social media including X (previously known as Twitter), Facebook and Instagram links to the above media release.

13. Paragraph 7(b) of the Directions Order required that the Claimants' social media including X (previously known as Twitter), Facebook and Instagram links to the relevant Website bearing the amended Claim Form (Version 5), Particulars of Claim (Version 6), Power of Arrest (as made 27 February) and Final Injunction (as made 27 February). I can confirm that social media was posted on the above accounts following the issuing of the media release on 28 February 2024. Please see "X/Twitter", "Facebook"; "Instagram" in **Exhibit PB20B attached hereto** for a selection of these, including posts shared via West Midlands Police on the Wolverhampton Police, Dudley Police, Sandwell Police and Walsall Police X/Twitter accounts. These posts are all dated 28 and 29 February 2024. Please note, Dudley and Walsall Council shared Instagram posts as 'stories' and so appeared for a period of 24 hours – I have therefore been unable to include screengrabs of these particular posts in the exhibit.

14. I respectfully draw attention to the posts within the social media feeds in **Exhibit PB20B attached hereto** which bear a link to the City of Wolverhampton Council's Car Cruising/Street Racing Injunction pages on its website:

[\(<https://www.wolverhampton.gov.uk/parking-and-roads/street-racing-injunction-application>\)](https://www.wolverhampton.gov.uk/parking-and-roads/street-racing-injunction-application)

where the amended Claim Form (Version 5), Particulars of Claim (Version 6), Power of Arrest (as made 27 February) and Final Injunction (as made 27 February) were uploaded on 1 March 2024.

15. Whilst technically the Councils' social media bore a link to the dedicated Car Cruising/Street Racing Injunction pages of the Councils' websites and was thus compliant with the requirements of paragraph 7(b) of the Directions Order from the date those social media posts were published (28 and 29 February), because the amended statements of case and orders were not uploaded to the Claimants' dedicated Injunction pages of their websites until 1 March (and would not thus have been visible to anyone clicking on the links to the Claimants' dedicated Car Cruising Injunction Pages of their Websites on 28 or 29 February), the Councils are content to deem 1 March (when the amended statements of case and injunction and power of arrest were added to the Councils' dedicated Car Cruising Injunction Pages of their Websites) as the date they complied with paragraph 7(b) of the order.

UPDATING WEBSITES (Paragraphs 5(c) and 7(a) of the Directions Order)

16. Paragraph 5(c) of the Directions Order required:

[By 4.00 p.m. on 15 March 2024] Updating the dedicated pages on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council and Walsall Council about the Injunction and Power of Arrest and this Order:

<https://www.wolverhampton.gov.uk/street-racing-injunction>

<https://www.dudley.gov.uk/residents/parking-and-roads/roadshighways-andpavements/car-cruising-injunction>

https://www.sandwell.gov.uk/info/200284/roads_travel_and_parking/3231/street_racing

https://go.walsall.gov.uk/black_country_car_cruising_injunction

Such pages shall carry a direct link to this Order.

17. Paragraph 7(a) of the Directions Order required the Claimants to take like steps to update the dedicated Car Cruising/Street Racing Injunction pages of their websites such that those pages contained copies of the amended statements of case (claim form and particulars of claim) and injunction order and power of arrest as made on 27 February 2024, again the deadline for this was 4.00 p.m. on 15 March 2024.

18. I can confirm that the dedicated street racing pages were updated as required before 16:00 on 15 March 2024. The websites were given a 'light touch' update on 29 February 2024 to reflect the outcome of the hearing, with the required documentation added as and when it became available. See "City of Wolverhampton Council street racing page", "Walsall Council street racing page", "Sandwell Council street racing page" and "Dudley Council street racing page" in **Exhibit PB20C attached hereto**.

19. Please also see "Email trail documents uploaded to Wolverhampton City Council website" denoting confirmation of completion received at 08:44 on 1 March 2024, "Email trail documents uploaded to Sandwell Council website" denoting confirmation of completion received at 16:32 on 1 March 2024, "Email trail documents uploaded to Walsall MBC website" denoting confirmation of completion received at 12:20 on 11 March 2024, and "Email trail documents uploaded to Dudley MBC website" denoting confirmation of completion received at 10:21 on 13 March 2024, all of which can be found within **Exhibit PB20C attached hereto**. The above was also confirmed by review of the homepages on 13 March 2024.

LINKING THE HOME PAGES OF THE COUNCILS' WEBSITES TO THE DEDICATED CAR CRUISING INJUNCTION PAGES OF THE COUNCILS' WEBSITES (Paragraph 5(d) of the Directions Order)

20. Paragraph 5(d) of the Directions Order required:

Ensuring that the home (or landing) page of each of the Claimants' main websites have and retain a prominent direct link to the dedicated webpages referred to above.

21. I can confirm that each home page contains a link to the Car Cruising/Street Racing Injunction webpage. See "City of Wolverhampton Council homepage", "Dudley Council homepage", "Sandwell Council homepage" and "Walsall Council homepage" see in **Exhibit PB20D attached hereto**. This was confirmed by a visual review of the homepages by me completed on 29 February 2024, the date on which the screengrabs referred to above were taken. I confirm the four Claimant Councils are aware of the ongoing nature of this obligation.

MAKING HARD COPY DOCUMENTS AVAILABLE AT THE COUNCILS' RECEPTION DESKS (Paragraph 5(e) and 7(c) of the Directions Order)

22. Paragraph 5(e) and 7(c) of the Directions order required the Claimants:

Ensuring that copies of the Injunction and Power of Arrest, amended statements of case (version 5 of the Claim Form, Version 6 of the Particulars of Claim) are available at the front desks of the Claimants' main offices by 4.00 p.m. on 12 March 2024..

23. I can confirm that the above was completed as required. Please see "Email trail denoting documents placed at Wolverhampton City Council reception" confirming completion received at 09:40 on 1 March 2024, "Email trail denoting documents placed at Sandwell Council reception" confirming completion received at 16:32 on 1 March 2024, "Email trail denoting documents placed at Walsall Council reception" confirming completion received at 10:13 on 1 March 2024, "Email trail denoting documents placed at Dudley Council reception" confirming completion (received at 13:25 on 12 March 2024), all of which can be found within **Exhibit PB20E attached hereto**.

24. The Council notes that whilst Dudley Council did not confirm the exact date of compliance, the e-mail from Dudley Council (12 March 2024 at 13:25 hours) indicated that the Community Safety Officer caused these documents to be deposited within the required timeframe. The City of Wolverhampton Council stipulated these documents should be deposited at the Councils' reception desks by 1 March and it is therefore assumed the officer from Dudley Council met that deadline. Even if the Councils are wrong about that, in any event the e-mail from Dudley Council on 12 March 2024 at 13:25 hours confirming compliance with this step indicates that at the latest Dudley Council complied with this by 13:25 on 12 March 2024 before the 4.00 p.m. deadline that day.

SIGNAGE (Paragraph 5(f) of the Directions order)

25. Paragraph 5(f) of the Directions order required the Claimants:

Causing to be displayed at regular intervals on the Claimants' electronic road signage the words "NEW HIGH COURT INJUNCTION PROHIBITING CAR CRUISING AND STREET RACING IN FORCE IN THIS AREA"; or words to the same effect and thereafter Causing to be displayed at regular intervals on the Claimants' electronic road signage the words "NEW HIGH COURT INJUNCTION PROHIBITING CAR CRUISING AND STREET RACING IN FORCE IN THIS AREA"; or words to the same effect and thereafter.

Erecting and maintaining official road signs (fixed, and temporary) throughout the Black Country Area in locations that are, or have been, hotspots car cruising activity stating "NEW HIGH COURT INJUNCTION PROHIBITING CAR CRUISING AND STREET RACING IN FORCE IN THIS AREA";

The signage to be activated and in place by 00:01 on 15 March 2024

26. I can confirm that these requirements have been complied with. Following the granting of the interim street racing injunction in December 2022, signage was erected at various known ‘hotspots’ across the four Claimant Council areas in January and February 2023, while at the same time signs publicising the previous car cruising injunction, in place from 2015-2021, were replaced.

27. This signage includes large permanent metal signs installed on certain arterial routes throughout the Claimant Council areas, along with smaller foamex sign attached to lampposts at known hotspots. Additionally, electronic matrix signs along various arterial routes throughout the Claimant Council areas have been programmed to display, at regular intervals, messages notifying road users of the existence of the Injunction (see, as examples, “Street racing digital roadsigs” in **EXHIBIT PB20F attached hereto**).

28. As evidenced by the witness statements of the local government officers of each of the Claimants (see **EXHIBIT PB20F attached hereto**), by 28 February 2023, signage can be summarised as follows:

Council	Metal Signs	Foamex Signs	Digital (for all four Councils)
Wolverhampton	Black Country Route, Vulcan Road Roundabout near Bilston Town Football Club (Lamppost 151)	Black Country Route (Lamppost 29)	Waterloo Road - Inbound / Nr Whitmore Hill – Wolverhampton
	Black Country Route near Greenhous Volkswagen Van Centre (Lamppost 152)	Black Country Route (Lamppost 32)	Ring Road St Peters / From Stafford St to Waterloo Rd – Wolverhampton
	Black Country Route parallel to Lunt Road/Vulcan Road Junction (Lamppost 169)	Springvale Avenue (Lamppost 2)	Ring Rd St Andrews / From Waterloo Rd to Chapel Ash – Wolverhampton
	Black Country Route parallel to Darlaston Brook (Lamppost 200)	Springvale Avenue (Lamppost 3)	Chapel Ash Inbound / Nr to Chapel Ash Island – Wolverhampton
	Black Country Route parallel to McDonald’s Off Coseley Road Island (freestanding)	Springvale Avenue (Lamppost 7)	Ring Rd St Marks / From Penn Island to Chapel Ash - Wolverhampton
	Black Country Route parallel to Nice 1 Limited off Coseley Road Island (Lamppost 62)	Springvale Avenue (Lamppost 22)	Ring Rd St Andrews / Nr to Bath Road – Wolverhampton
	Black Country Route near Brook Street (Lamppost 128)	Springvale Avenue (Lamppost 25)	Ring Road St Johns / Penn Road Island – Wolverhampton
	Black Country Route near Overfield Drive (Lamppost 17)		Stafford Road Inbound / Between Cannock Rd and

	<p>Black Country Route Northside of roundabout junction with Black Country New Road</p> <p>Black Country Route (Westbound carriageway approach junction with Black Country New Road)</p>		<p>Ring Rd – Wolverhampton</p> <p>Penn Road Inbound / Nr Mercedes Benz – Wolverhampton</p> <p>Dudley Rd I/B Nr Bell Place</p>
Dudley	<p>Duncan Edwards Way Near (Lampposts 64 and 108)</p> <p>Birmingham Road, Central Reservation</p> <p>Birmingham New Road/Bean Road Junction</p> <p>Hagley Road (A456) Central Reservation</p> <p>Merry Hill Centre, Entrance to Hop House</p> <p>Merry Hill Centre, Entrance to Waterfront East</p> <p>Merry Hill Site 3</p> <p>Merry Hill site – Off Island to Construction College</p> <p>A456 Manor Way M5 Junction 3, Exit</p> <p>A456 Manor Way, Eastbound Approach to Grange Road Roundabout</p> <p>A456 Manor Way, Westbound to Grange Road Roundabout</p>	<p>6 Signs at Car Park Cross Street/Stafford Street</p> <p>3 signs at New Mill Street/Minorities</p> <p>3 signs at Flood Street Car Park</p> <p>30 Signs at various locations around the Merry Hill Centre</p>	<p>Ring Rd / St Georges</p> <p>Ring Rd / St Marks</p> <p>Ring Rd - St Johns to Snowhill Jct</p> <p>Ring Rd - St Patricks to Stafford St Jct</p> <p>Ring Rd - Stafford St to Broad St</p> <p>Ring Rd - Broad St to Bilston St Island</p> <p>Ring Rd - Bilston St Island to Broad St</p> <p>Ring Rd - Snowhill Jct to Bilston St Island</p> <p>Wolverhampton Road / Primley Avenue</p> <p>Bescot Road / Bescot Drive</p> <p>Lichfield Road / Cartbridge Lane</p> <p>Birmingham Road / Nr Charlemont Road</p>
Sandwell	<p>Axeltree Way (Retail Park Entrance), Wednesbury A41</p> <p>Black Country Route A41 (near Dreams)</p> <p>Off Junction 2 M5 (Oldbury) (towards Birchley Island)</p> <p>Kenrick Way, West Bromwich (near Glover Street in the direction of Green Street)</p> <p>Black Country Route between Hallens Drive Roundabout and Patent Drive Roundabout</p> <p>A461 Exit of Junction 9 of the M6 towards Wednesbury</p>	<p>Axeltree Way (Retail Park Entrance), Wednesbury</p> <p>Axeltree Way (Roundabout near Curry's, Lamppost 1), Wednesbury</p> <p>Axeltree Way (Roundabout near Ikea, Lamppost 12), Wednesbury</p> <p>Axeltree Way (Roundabout near Burger King, Lamppost 34), Wednesbury</p> <p>Moorcroft Drive/Hallens Drive Junction, Wednesbury (Lamppost 1)</p> <p>Patent Drive/Hallens Drive Junction, Wednesbury (Lamppost 13)</p>	<p>Darlaston Road / Nr Cemetery Road</p> <p>Green Lane /Nr Beatrice Street</p> <p>Pleck Rd / Wolve Rd – Walsall</p> <p>Bloxwich Lane – Walsall</p> <p>BCNR / Nr Wiggle – Bilston</p> <p>BCR / Nr Bilston FC Willenhall Rd O/B</p> <p>A4148 - Broadway North</p> <p>B4151 - Sutton Rd</p> <p>A4031-Walsall Rd Nr Greenside Way</p> <p>B4210-Stafford St Nr Proffit St & Hospital St</p>

		<p>Hallens Drive (Lamppost 19)</p> <p>A41 Roundabout Great Bridge Lamppost R3/5 (by Olympus)</p> <p>Brickhouse Lane South (Lamppost 7) (by Petrol Station)</p> <p>Green Street, (Lamppost 12) West Bromwich</p> <p>Kenrick Way (Lamppost 55) West Bromwich</p> <p>Off Junction 2 M5, Oldbury (Toys 'R' Us Car Park Entrance)</p> <p>Off Junction 2 M5, Oldbury (Toys 'R' Us Car Park (Centre))</p> <p>Off Junction 2 M5, Oldbury (Toys 'R' Us Junction with Wolverhampton Road)</p> <p>Wolverhampton Road, Oldbury (Lamppost 27)</p> <p>ASDA Retail Entrance (Off Great Bridge Street), Tipton</p> <p>McDonald's Car Park Entrance, Great Bridge, Tipton</p> <p>Dudley Port Junction of Sedgley Road East (before traffic lights in Great Bridge Direction) (Lamppost 34)</p> <p>Kenrick Way/Green Street Junction (towards West Bromwich) (Lamppost 12)</p> <p>Kenrick Way (near Cricketer's Arms public house) (Lamppost 55)</p> <p>Kenrick Way away from West Bromwich</p> <p>Black Lake/New Swan Lake Junction (Wednesbury direction)</p>	<p>Bilston Road / Nr Steelhouse Lane</p> <p>Wellington Road / Nr Wolverhampton Street</p> <p>Stafford Road / The Maltings</p> <p>Wednesfield Road / Nr Bowmans Harbour</p> <p>Oxford Street / Nr Hare Street – Bilston</p> <p>Horseley Fields / Nr St James Street I/B</p> <p>Penn Road / Nr Lea Road I/B</p> <p>Birmingham New Road / Nr Shaw Road I/B</p> <p>Lichfield Road / Nr Lyndale</p> <p>Wednesfield Road / Nr Lincoln Road I/B</p> <p>Cannock Road / Old Hampton Road</p> <p>Willenhall Road / Nr Vaughn Road I/B</p> <p>Stafford Road / Nr Farmbrook I/B</p> <p>Compton Road / Compton Village</p> <p>Wolverhampton Road East / Nr Dudding Road I/B</p> <p>Bilston Road / Nr Steelhouse Lane O/B</p> <p>Black Country Route / Nr The Lunt</p> <p>Penn Road / Nr Lea Road O/B</p> <p>Birmingham Road / Nr Lever Street O/B</p> <p>Stafford Road / Nr Goodyear Island I/B</p> <p>Stafford Street / Nr Nursery Street O/B</p> <p>Wednesfield Road / Nr Lincoln Street I/B</p>
Walsall	<p>A454 Little Aston Road/Chester Road Junction</p> <p>A452 Chester Road North</p>	<p>Black Country New Road, (lampposts 12, 13, 18, 19 and 35)</p>	<p>Wergs Road</p> <p>Coseley Road / BCR Link</p>

A452 Chester Road, Shire Oak Junction	High Street, Moxley (Lampposts 12, 18 and 19)	Stourbridge Road. Penn
A34 Stafford Road, Near Yates Farm	High Street, Moxley (Lampposts 10 and 11)	Willenhall Road / Lower Horseley Fields O/B
A462 Essington Road near Kewstoke Close	Moxley Road (Lamppost 28)	Stafford Road / Nr Gorsebrook Road
A4124 Lichfield Road, near to the footpath to Highmoor Close	Birmingham New Road (Lamppost 35)	Wobaston Road /Nr Patshul Avenue
A461 Bescot Road (near the depot M6, Junction 9)	Wisemore, Walsall Stop Sign (S05)	Ring Road St Peters (A0141)
A4031 West Bromwich Road near Greenside Way	Wisemore, Walsall (Lamppost 6)	Ring Road St Andrews (A0141)
A41 Black Country New Road between Southern Way and Bull Lane	Bescot Crescent (Lampposts 24 and 38)	Ring Road St Davids (A0117)
A454 Keyway, Walsall	Brickyard Lane, Aldridge – (Lampposts 3, 6, 28 and 29)	BNR / Nr BCR
A454 Black Country Route (Westbound) (near Marshland Way)	Northgate Way Aldridge (Lampposts 1 and 2)	Dudley St / Nr the Splitter
A454 Black Country Route (Eastbound) near to Wellmans Road	Coppice Road, Brownhills (Lampposts 3, 5, 21 and 22)	Stafford Rd / Nr Oxley Moor
Black Country Route (near exit from Armstrong Way)	Maybrook Road, Brownhills (Lampposts 3, 6,.13 and 20)	

29. The Claimant Councils continue to monitor street racing activity across the Black Country area and, between 1 March 2023 and 26 February 2024, installed additional signs (as evidenced by the witness statements of local government officers within **EXHIBIT PB20F attached hereto**) at a number of locations as follows:

Council	Metal Signs	Foamex Signs
Wolverhampton	No additional metal signs	No additional foamex signs
Dudley	No additional metal signs	No additional foamex signs
Sandwell	Birmingham Road, Oldbury between junctions of Rood End Road and Malin Street, (Double-sided so visible in both directions) Kenrick Way West Bromwich at the junction with Trinity Way (Eastbound towards Smethwick) Kenrick Way West Bromwich at the junction with Trinity Way (Westbound towards West Bromwich) Kenrick Way, West Bromwich at the junction with Junction 1, M5	No additional foamex signs
Walsall	A463 Black Country Route (Eastbound) (Near to the Lunt)	Black Country New Road, Pedestrian Crossing, Lamppost 19

	A463 (Westbound) (Near to the Lunt)	
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30. I can confirm, for the avoidance of doubt, that none of the signage installed between January 2023 and 2024 has been removed.

31. All versions of the various iterations of the interim injunctions granted in this matter between December 2022 and December 2023 required the Claimant Councils to “erect and **maintain** (my emphasis) official road signs (fixed and temporary) throughout the Black Country Area in locations that are, or have been, hotspots for car cruising activity”.

32. As submitted to the Court at the Final hearing of this matter on 27 February 2024, and as evidenced by the witness statements of the local government officers within **EXHIBIT PB20F attached hereto**, the street racing signage has been subject to a regular maintenance schedule as follows:

Council	Signage Maintenance Schedule
Wolverhampton	Signs on major arterial routes – Inspect every two months Signs on minor roads – Inspect every three months Beginning 1 April 2024 <i>(Reference: Paragraph 7 witness statement of Tim Philpot (Wolverhampton City Council) dated 09 February 2024)</i>
Dudley	Signs on major arterial routes – Inspect monthly Signs on minor roads – Inspect monthly Beginning 26 February 2024 <i>(Reference: Paragraph 7 witness statement of Mark Wilson (Dudley Metropolitan Borough Council) dated 01 February 2024)</i>
Sandwell	Signs on major arterial routes – Inspect at least every six months Signs on minor roads – Inspect at least every six months <i>(Reference: Paragraph 29 witness statement of Andrew Clarke (Sandwell Metropolitan Borough Council) dated 25 January 2024)</i>
Walsall	Signs on major arterial routes – Inspect every two months Signs on minor roads – Inspect every three months Beginning 1 April 2024 <i>(Reference: Paragraph 11 witness statement of Steven Gittins (Walsall Metropolitan Borough Council) dated 5 February 2024)</i>

33. Furthermore, as submitted to the Court at the Final hearing of this matter on 27 February 2024, and as evidenced by the witness statements of the local government officers within **EXHIBIT PB20F attached hereto**, I confirm that during February 2024, each of the Claimant Councils uploaded details of the signage in their area to their respective street racing webpages and established and publicised on the same

webpage details of how members of the public could report any damaged or missing signs as follows:

Council	Reporting Mechanisms (damaged or missing signs)
<p>Wolverhampton</p>	<p>Telephone: 01902 551155</p> <p>https://wolverhampton.maps.arcgis.com/apps/webappviewer/index.html?id=f7be734351534608907e3162133bcb74 (map of signs on Website)</p> <p>https://www.wolverhampton.gov.uk/parking-and-roads/contact-roads (link to portal for reporting missing/damaged signs)</p> <p><i>(Reference: Paragraph 6 witness statement of Tim Philpot (Wolverhampton City Council) dated 09 February 2024)</i></p>
<p>Dudley</p>	<p>Telephone: 0300 555 2345 e-mail: DudleyCouncilPlus@dudley.gov.uk</p> <p><i>(Reference: Paragraph 8 witness statement of Mark Wilson (Dudley Metropolitan Borough Council) dated 01 February 2024)</i></p>
<p>Sandwell</p>	<p>Telephone: 0121 368 1177</p> <p>https://www.sandwell.gov.uk/streetracing (Sandwell’s street racing injunction pages)</p> <p>https://www.sandwell.gov.uk/roads-travel-parking/report-problem-road-sign (link to portal for reporting missing signs)</p> <p><i>(Reference: Paragraph 30 witness statement of Andrew Clarke (Sandwell Metropolitan Borough Council) dated 25 January 2024)</i></p>
<p>Walsall</p>	<p>https://mymaps.walsall.gov.uk/streetracingsolo.html (maps of sign locations)</p> <p>Missing/damaged signs to be reported to Walsall MBC’s Community Protection Team e-mail: CommunityProtection@walsall.gov.uk; telephone: 01922 653060</p> <p>Address: Community Protection, Walsall Council, Civic Centre, Darwall Street, Walsall, WS1 1TP</p> <p><i>(Reference: Paragraph 9 witness statement of Steven Gittins (Walsall Metropolitan Borough Council) dated 5 February 2024)</i></p>

34. Please also see “Signage reporting mechanisms, City of Wolverhampton Council”, “Signage reporting mechanisms, Sandwell Council”, “Signage reporting mechanisms, Walsall Council” and “Signage reporting mechanisms, Dudley Council” in **EXHIBIT PB20F attached hereto.**

35. With reference to paragraph 5(f) in the directions order made by the Honourable Mr Justice Julian Knowles on 27 February 2024 which required signage to be activated and in place by 00:01 on 15 March 2024, I can confirm that the large permanent metal signs, the foamex signs and the digital signage which was in place and on display as of the hearing of 27 February 2024 (as detailed in the tables above and evidenced by the witness statements of the local government officers within **EXHIBIT PB20F attached hereto**) remains in place and has not been altered in any way since the hearing of 27 February 2024.

36. The Claimants remain committed to the maintenance schedule specified above, and the reporting mechanism described above, both of which remain active.

37. I was present in Court on 27 February 2024 when the Honourable Mr Justice Julian Knowles granted the Injunction and, in doing so, sanctioned the signage that had been installed and activated throughout the Claimant Councils' areas up to that point, as well as sanctioning the maintenance and reporting regimes (as detailed above), as an effective means of publicising the injunction to Persons Unknown.

38. As the signage was in place, remains in place and the Claimant Councils remain committed to a robust maintenance and review regime, I respectfully suggest the Claimants have treated the requisite signage as being in place and activated from the day after the hearing, namely from 00:01 hours on 28 February 2024.

39. The Claimant Councils remain committed to ensuring that signage concerning the injunction is installed in appropriate places and is present at known street racing hotspots. We will monitor and install new signs at new hotspots as required and inform the court of any changes in the signage at review hearings of the injunction.

LIAISON WITH WEST MIDLANDS POLICE AND NEIGHBOURING POLICE FORCES (Paragraph 5(g) of the Directions Order)

40. Paragraph 5(g) of the Directions Order required the Claimants:

Requesting that the police forces for the West Midlands, Warwickshire, West Mercia, Staffordshire and Leicestershire post on their website and Instagram, X (previously known as Twitter), and Facebook accounts, a link to this Order.

41. I can confirm that this request was made on 29 February to the above forces and that some have shared messaging on their social channels as a result. Please see "Email to police forces" within **Exhibit PB20G attached hereto**.

SERVICE ON NAMED DEFENDANTS (Paragraphs 6 and 9 of the Directions Order)

42. Paragraphs 6 and 9 of the Directions Order required that:

The Claimants shall serve this Order, version 5 of the Claim Form, Version 6 of the particulars of Claim, the Injunction and Power of Arrest made on 27 February 2024 on the fifth sixth seventh, eighth and ninth Defendants ('the named Defendants') by email, the named Defendants having agreed to accept service by this method. Service must be completed by 16:00 on 15 March 2024.

43. I can confirm that Adam Sheen, Senior Solicitor at the City of Wolverhampton Council, completed service of the named defendants on 1 March 2024. Please see e-mails from Adam Sheen to the Fifth to Ninth Defendants and/or their solicitors to this effect and accompanying certificates of service within **Exhibit PB20H attached hereto**.

REACH OF SOCIAL MEDIA PUBLICISING THE ORDERS OF 27 FEBRUARY 2024

44. The court may wish to know that social media posts issued by the City of Wolverhampton Council on X, Facebook and Instagram between 29 February and 20 March 2024 achieved a reach of 31,070, impressions of 35,377 and an engagement rate of 0.5%.

45. Reach is described by Orlo, the social media system used by the City of Wolverhampton Council as follows: "This shows you the total number of times the posts in this campaign have been seen by different people."

46. Impressions. "This gives you the total number of times the posts in this campaign have been shown on a person's screen."
47. Engagement: "This shows the level of engagement the content you have shared has generated during the campaign."
48. Please note, the above relates only to posts issued by The City of Wolverhampton Council. Partner Claimant Councils and West Midlands Police shared a number of posts, and the data around reach and impressions gained by these will not be captured in the above.
49. Furthermore, between 28 February and 20 March 2024, the City of Wolverhampton Council's street racing webpage received 114 views, the Walsall Council street racing webpage received 30 views, the Sandwell Council street racing webpage received 96 views and the Dudley Council street racing webpage received 52 views.
50. Over and above the requirements of the order of the High Court made by the Honourable Mr Justice Julian Knowles on 27 February 2024, other actions have been completed that the Court may wish to know about.
51. A number of additional posts have been made on social media on various dates in March and April 2024, including posts reminding people of the existence and terms of the injunction and linking to the street racing information on the City of Wolverhampton Council website, and also linking to a new YouTube video which was created on 22 March 2024 and includes details of the application, the terms of the injunction and footage from street races in the Black Country and elsewhere (<https://youtu.be/sjsMbQo4Ytc>). These can be found in in **Exhibit PB20I attached hereto**, along with screengrabs from the video.
52. In addition, a further update of the dedicated webpages of the four Claimants has subsequently been completed to include the new video detailing the terms of the injunction referred to above (<https://youtu.be/sjsMbQo4Ytc>).

53. The court may also like to know that a sustained programme of communications activity is planned throughout the life of the injunction, including regular messaging to remind people of the existence of the injunction and timely news releases in the event of convictions.

54. For the above reasons stated reasons, I believe that notice of the outcome of the hearing for the application of the Injunction and Power of Arrest has been brought to the attention of the public at large, and in particular, those likely to be affected by this application, or those engaging, looking to engage, or likely to engage, in the behaviour prohibited by this application and the interim injunction if granted.

55. I will continue to ensure future steps in the Communications Plan are acted upon at the relevant time and will continue to liaise with my counterparts in Communications Teams of Dudley, Sandwell and Walsall Councils and West Midlands Police to ensure that they are disseminating the information as and when necessary.

STATEMENT OF TRUTH

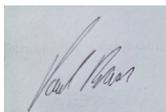
I believe that the facts stated in this Witness Statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without and honest belief in its truth.

Full Name: PAUL STEVEN BROWN

Position: COMMUNICATIONS MANAGER

Name of Claimant: City of Wolverhampton Council

Signed



Print Name PAUL BROWN

Dated: 26 April 2024

Statement of:	Paul Brown
Statement no:	20
For:	Claimants
Date:	26 April 2024
Exhibits:	PB20A – PB20I

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

**CLAIM NO: KB-2022-
BHM000188**

B E T W E E N:

- (1) WOLVERHAMPTON CITY COUNCIL**
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL**
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL**
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

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- (5) Mr ANTHONY GALE**
- (6) Miss WIKTORIA SZCZUBLINSKA**
- (7) Mr ISA IQBAL**
- (8) Mr MASON PHELPS**
- (9) Ms REBECCA RICHOLD**

Defendants

EXHIBIT PB20A

This is the document referred to as "Exhibit PB20A" in the witness statement of Paul Brown dated 26 April 2024

i) Statement of: Paul Brown
ii) Statement No: 20
iii) For: Claimants
iv) Dated: 26.04.2024
v) Exhibits: PB20A-PB20I

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO: KB-2022-BHM000188

B E T W E E N:

- (1) WOLVERHAMPTON CITY COUNCIL
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Claimants

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- (9) Ms REBECCA RICHOLD

Defendants

EXHIBIT PB20A

This is the document referred to as "EXHIBIT PB20A" in the twentieth statement of Paul Brown dated 26 April 2024.

High Court grants full injunction to ban street racing in region

Released: Wednesday 28 February, 2024



The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country.

It prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

Unlike the interim injunction which has been in place since 2022, the full injunction also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The injunction covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and anyone breaching it will be in contempt of court and could face penalties including imprisonment, a fine, or an order to have their assets seized.

Granting the final injunction at the High Court in Birmingham yesterday (Tuesday 27 February, 2024), Mr Justice Julian Knowles said: "Car cruising is a euphemism; it's organised dangerous driving and there have sadly been injuries and fatalities."

PC Mark Campbell, from the Operation Hercules team, West Midlands Police's tactical response to street racing in the West Midlands, described the injunction as "highly valuable and a tried and tested means of prevention and resolution", without which "there will be a serious collision in which people are very likely to be seriously injured or killed."

He told the court: "It is only a matter of time before the high-speed driving involved in organised races leads to another multiple fatality incident – this may be the driver of the vehicle, an innocent member of the public or any number of spectators actively taking part in the street cruising meet."

He said that he has witnessed "400-plus" vehicles at street cruises in locations like the Black Country Route in Bilston or Manor Way, Halesowen, and that the "potential for a

very serious collision is massive" because of the speeds involved. When police are called, "the street cruisers drive off in a chaotic manner, over central reservations, along footpaths, sometimes travelling the wrong way down a dual carriageway into oncoming vehicles", and that is it "only a matter of time this will result in a fatal collision".

He also highlighted the police resources needed to deal with street racing, which are "therefore not providing policing to other parts of the community." In addition, traffic, police dogs, drone teams and helicopters are often required to intervene and add support, at huge cost to taxpayers.

He added: "The price paid by communities is incalculable. They are exposed to a high level of harm, noise, intimidation, disruption and threats. I have personally spoken to members of the public who are at their wits ends. One was assaulted after approaching a group of street cruisers performing stunts, one even had suicidal thoughts of the constant noise and intimidation."

The court was shown video footage of street racing meets in the Black Country and elsewhere, including an event in Stevenage, Hertfordshire, on 18 July 2019 in which a serious collision occurred at a street racing event, resulting in one person suffering life-changing injuries and 16 others being injured. Two drivers involved were convicted of dangerous driving and PC Campbell said: "The fact that no one was killed was purely down to luck".

Mr Justice Julian Knowles said the videos "show cars racing at high speed, organised dangerous driving, with spectators watching, filming, encouraging. Spectators are putting themselves at very considerable danger."

Team Leader for Wolverhampton Anti-Social Behaviour Team Pardip Nagra, who presented evidence including statements from councillors, MPs, residents and businesses across the Black Country, told the court: "I believe it is vital that we have an injunction in place across the Black Country to enable West Midlands Police and the four councils to continue to tackle the dangerous and anti-social activity of car cruising.

"There is overwhelming support from local residents and businesses who, prior to the previous injunction being in place, had all suffered for many years and who are concerned that, without an injunction, the scale of the car cruising issue will return to the levels experienced previously."

The application was led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council and Walsall Council, and supported by West Midlands Police. Speaking for the claimants, Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Adults and Wellbeing, said: "We are delighted that the High Court has seen fit to grant this full and final injunction which will help us continue to tackle the menace of street racing in the Black Country.

"The wealth of evidence presented to the court makes it clear the impact this anti-social, irresponsible and highly dangerous behaviour has had on people across our region, and the tragic incidents both locally and nationally which have caused serious injuries and even fatalities, and I would like to thank everyone who has shared their experiences so candidly."

For more information about the injunction, including the Power of Arrest, the Court Order, documents and evidence, please visit the street racing pages of the applicants –

Wolverhampton (www.wolverhampton.gov.uk/street-racing-injunction), Walsall, (https://go.walsall.gov.uk/black_country_car_cruising_injunction), Sandwell (www.sandwell.gov.uk/streetracing), or Dudley (www.dudley.gov.uk/car-cruising-injunction) – which are in the process of being updated.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

The injunction and power of arrest will remain in force for a period of at least three years, and will be subject to an annual review. It will come into force in the coming days, once the claimants have completed certain service provisions. In the meantime, the interim injunction and power of arrest remain in force.

To contact the claimants, write to: FAO: Black Country Car Cruise, Legal Services, City of Wolverhampton Council, Civic Centre, St Peter's Square, Wolverhampton WV1 1RG. Alternatively, email litigation@wolverhampton.gov.uk or call 01902 556556.

ENDS

Media release, issued 28 February 2024

Car cruising in the Black Country formally banned after High Court ruling

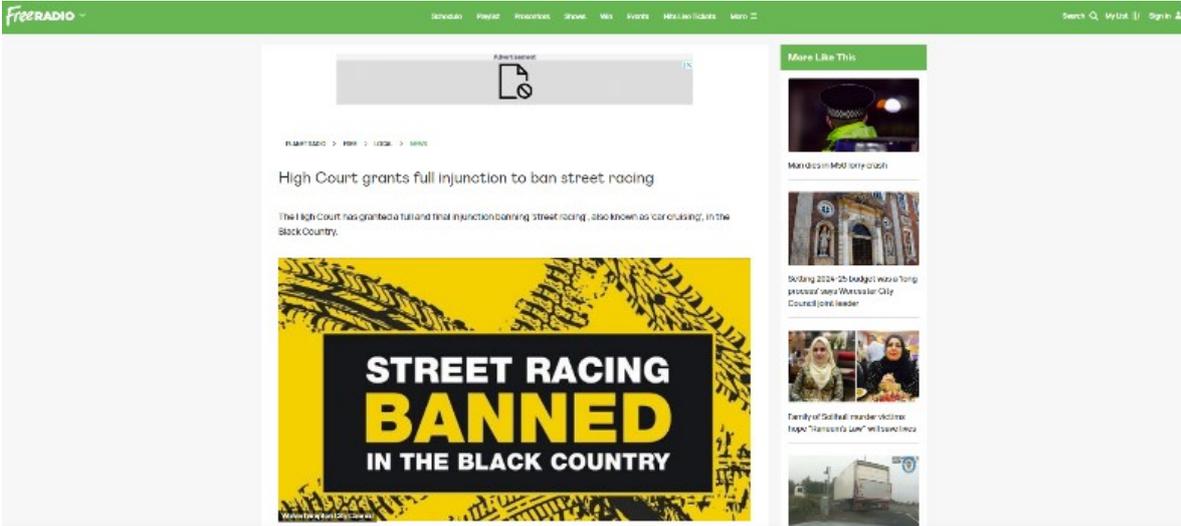
Car cruising and street racing in the Black Country has been banned after the High Court issued a full and final injunction.

By Paul Jenkins | Published Feb 28 | Last updated Feb 28 | 2 Comments



Delight: Councillor Jasbir Jaspal who has campaigned on behalf of the City of Wolverhampton Council on the issue of car cruising in the Black Country

Express & Star, 28 February 2024



Free Radio, 28 February 2024

Councils granted street cruising ban amid crackdown



Police and councils say the ban is vital to keep people safe

Josh Sandford
BBC News, West Midlands

28 February 2024

A ban on street racing across Birmingham and the Black Country has been granted by judges.

A full three-year injunction is now in place for five local authorities until 27 February 2027.

The order prohibits drivers, riders or passengers participating in racing - also known as street cruising - anywhere in Birmingham, Wolverhampton, Dudley, Sandwell and Walsall.

A number of arrests have been made under temporary injunctions, and earlier this month a senior police officer said a permanent ban would save lives.

BBC News, 28 February 2024

Residents plagued by '400 cars' before race ban



A police officer said he had witnessed dangerous driving at the events

Josh Sandford
BBC News, West Midlands

29 February 2024

Residents were plagued by street-racing meets of up to 400 cars before a ban on the practice, according to a police officer.

PC Mark Campbell said he witnessed a huge number of vehicles at "cruises" in locations across the Black Country.

Motorists had been seen driving erratically near the Black Country Route in Bilston, Wolverhampton, and Manor Way in Halesowen.

A ban on street racing across Birmingham and the Black Country was granted by judges this week, giving officers extra powers to crack down on drivers, riders and passengers.

BBC News, 29 February 2024

High Court ruling bans street racing in the Black Country

29th February

COURT CRIME



High Court ruling bans street racing across the Black Country (Image: Getty Images)



By **Bev Holder**
Chief Reporter
@StourbridgeNews

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2 Comments

THE High Court has granted a full and final injunction banning street racing, also known as car cruising, across the Black Country.

Halesowen News, 29 February, 2024

United Kingdom Law

High Court Bans Car Cruising in Black Country, Targets Street Racing Menace

Discover how the High Court's ban on car cruising in the Black Country boroughs is a significant step towards enhancing public safety and addressing the dangers of street racing in the community.

BNN Correspondents
28 Feb 2024 10:14 EST

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PROHIBITION ON CAR CRUISING & STREET RACING IN FORCE IN THIS AREA
Dudley Sandwell Walsley

agency-beta
Asana
Project status: On Track
View project Create task

BNN, 29 February 2024

FEATURED EVENTS



Section 16 Claims of Discrimination
Arising from Disability
13 03 2024
Online (live)



The Regulator of Social Housing
Consumer Standards & self-referral process
26 03 2024
Online (live)

PublicLawJobs LocalGovernmentLawyer
PublicLawToday

West Midlands authorities secure final injunctions against car cruising

February 29, 2024

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A High Court judge has granted local authorities in the West Midlands full and final injunctions banning 'street racing', also known as 'street racing'.

One injunction was obtained by the 'Black Country' boroughs of Wolverhampton, Dudley, Sandwell and Walsal, covering the whole of their areas, while the other was secured by Birmingham City Council.

At a hearing at the High Court in Birmingham earlier this week (27 February, 2024), Mr Justice Julian Knowles said: "Car cruising is a

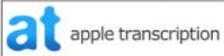
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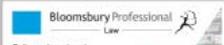
Feb 15, 2024
Government to give police forces £85m for nationwide rollout of 'hotspot' patrols tackling anti-social behaviour

Feb 09, 2024
Government to transfer Police and Crime Commissioner functions to West Midlands and South Yorkshire mayors



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Fully updated and providing analysis of the revised guidance from the Anti-Social Behaviour, Crime and Policing Act 2014, the book includes case studies, practical examples, template documents and tactical advice

Order your copy today!

Local Government Lawyer, 29 February 2024

The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country.

It prohibits people from participating, as a driver, a rider or a passenger, in a gathering of 2 or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

Unlike the interim injunction which has been in place since 2022, the full injunction also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The injunction covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and anyone breaching it will be in contempt of court and could face penalties including



The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country

Media release - City of Wolverhampton Council, 28 February 2024

High Court grants full injunction to ban street racing in region

Published on 28 February 2024

[Print](#)

The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country.



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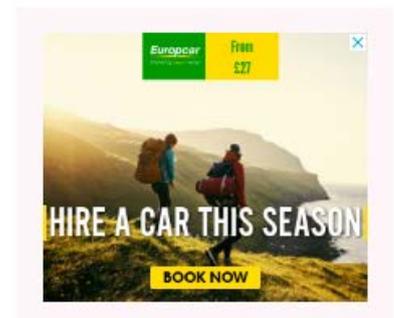


Ok



Bad

It prohibits people from participating, as a driver, a rider or a passenger, in a



Media release – Walsall Council, 28 February 2024

High Court grants full injunction to ban street racing in region

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It prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

Unlike the interim injunction which has been in place since 2022, the full injunction also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The injunction covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and anyone breaching it will be in contempt of court and could face penalties including imprisonment, a fine, or an order to have their assets seized.

Granting the final injunction at the High Court in Birmingham yesterday (Tuesday 27 February, 2024), Mr



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Media release – Sandwell Council, 28 February 2024



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High Court grants full injunction to ban street racing in region

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Unlike the interim injunction which has been in place since 2022, the full injunction also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a

Media release – Dudley Council, 29 February 2024

Statement of:	Paul Brown
Statement no:	20
For:	Claimants
Date:	26 April 2024
Exhibits:	PB20A – PB20I

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KING'S BENCH DIVISION**

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- (9) Ms REBECCA RICHOLD**

Defendants

EXHIBIT PB20B

This is the document referred to as "Exhibit PB20B" in the witness statement of Paul Brown dated 26 April 2024

i) Statement of: Paul Brown
ii) Statement No: 20
iii) For: Claimants
iv) Dated: 26.04.2024
v) Exhibits: PB20A-PB20I

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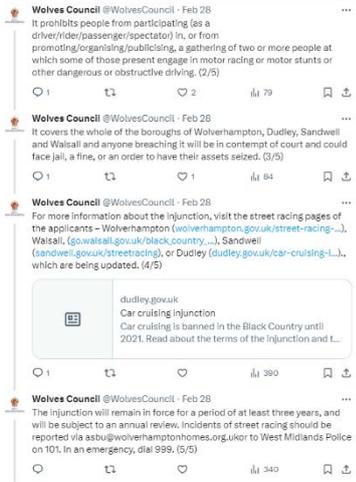
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EXHIBIT PB20B

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X/Twitter, 28 and 29 February 2024



The High Court has granted a full and final injunction banning street racing (aka car cruising) in the Black Country. It covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and anyone breaching it will be in contempt of court and could face jail, a fine, or an order to have their assets seized.

The new injunction prohibits people from participating (as a driver, rider, passenger or spectator) in, or from promoting, organising or publicising, a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

The application was led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council and Walsall Council, and supported by West Midlands Police. Speaking on behalf of the claimants, Councillor Jasbir Jaspal, the Wolverhampton Council's Cabinet Member for Adults and Wellbeing, said: "We are delighted that the High Court has seen fit to grant this full and final injunction which will help us continue to tackle the menace of street racing in the Black Country.

"The wealth of evidence presented to the court makes it clear the impact this anti-social, irresponsible and highly dangerous behaviour has had on people across our region, and the tragic incidents both locally and nationally which have caused serious injuries and even fatalities, and I would like to thank everyone who has shared their experiences so candidly."

For more information about the injunction, please visit the street racing injunction pages of the applicants – Wolverhampton (<https://www.wolverhampton.gov.uk/street-racing-injunction>), Walsall, (https://go.walsall.gov.uk/black_country_car_cruising...), Sandwell (<https://www.sandwell.gov.uk/streetracing>), or Dudley (<https://www.dudley.gov.uk/car-cruising-injunction>). Please note, these are in the process of being updated, which will be completed in due course. Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

Full story 📄 <https://www.wolverhampton.gov.uk/.../high-court-grants...>



Wolverhampton Police
21 h · 🌐



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Sandwell
21 h · 🌐

The High Court has granted a full and final injunction banning street racing (also known as car cruising) in Sandwell and the rest of the Black Country.



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Dudley borough
20 h · 🌐

The High Court has granted a full and final injunction banning street racing (aka car cruising) in the Black Country, including Dudley borough.
More information 📄 <https://www.dudley.gov.uk/car-cruising-injunction>



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The High Court has granted a full and final injunction banning street racing (aka car cruising) in the Black Country, including Dudley borough.
More information 📄 <https://www.dudley.gov.uk/car-cruising-injunction>

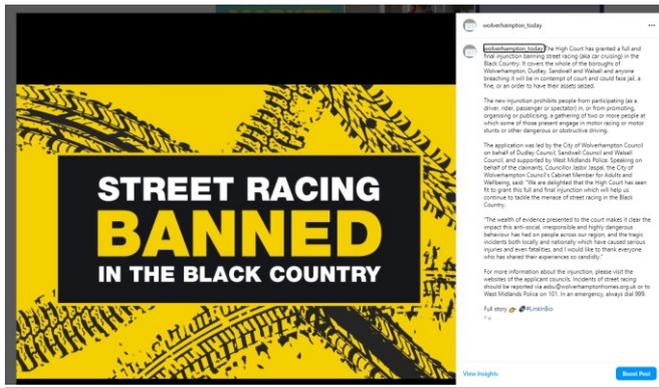


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The High Court has granted a full and final injunction banning street racing (aka car cruising) in the Black Country. It covers the whole of the boroughs of Wolv... See more



Our Walsall
10 h

Facebook, 28 and 29 February, 2024



Instagram, 28 February 2024

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Claimants

and

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

- (5) Mr ANTHONY GALE**
- (6) Miss WIKTORIA SZCZUBLINSKA**
- (7) Mr ISA IQBAL**
- (8) Mr MASON PHELPS**
- (9) Ms REBECCA RICHOLD**

Defendants

EXHIBIT PB20C

This is the document referred to as "Exhibit PB20C" in the witness statement of Paul Brown dated 26 April 2024

i) Statement of: Paul Brown
ii) Statement No: 20
iii) For: Claimants
iv) Dated: 26.04.2024
v) Exhibits: PB20A-PB20I

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO: KB-2022-BHM000188

B E T W E E N:

- (1) WOLVERHAMPTON CITY COUNCIL
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

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4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

- (5) Mr ANTHONY GALE
- (6) Miss WIKTORIA SZCZUBLINSKA
- (7) Mr ISA IQBAL
- (8) Mr MASON PHELPS
- (9) Ms REBECCA RICHOLD

Defendants

EXHIBIT PB20C

This is the document referred to as "EXHIBIT PB20C" in the twentieth statement of Paul Brown dated 26 April 2024.

High Court grants order banning street racing in the Black Country

HOME / PARKING AND ROADS / HIGH COURT GRANTS ORDER BANNING STREET RACING IN THE BLACK COUNTRY

The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country.

It forbids anyone who is a driver, rider or passenger in or on a motor vehicle to participate between the hours of 3pm and 7am in a gathering of two or more persons within the Black Country area at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.



It also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

YOU MAY ALSO LIKE

- High Court hands down sentence to another street racer >
- Street racing injunction review hearing next week >
- High Court continues interim Black Country street racing ban >
- Street racers could face jail for breaching court injunction >

DOWNLOADS

City of Wolverhampton Council street racing page

Black Country street racing injunction

Overview

The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country.

The Black Country area includes all of the boroughs of Dudley, Sandwell, Walsall and Wolverhampton.

What the injunction means

It forbids anyone who is a driver, rider or passenger in or on a motor vehicle to participate between the hours of 3pm and 7am in a gathering of two or more persons within the Black Country area at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

It also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The injunction covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and has a Power of Arrest attached to it which gives the police the power to arrest anyone who breaches it. Breach of an injunction is a contempt

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Walsall Council street racing page

High Court grants full injunction to ban street racing in region

[Home](#) | [Latest news](#) | [High Court grants full injunction to ban street racing in region](#)

The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country.

It prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

Unlike the interim injunction which has been in place since 2022, the full injunction also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The injunction covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and anyone breaching it will be in contempt of court and could face penalties including imprisonment, a fine, or an order to have their assets seized.



Share on



Sandwell Council street racing page

Car cruising injunction

Share

Injunction bans street racing in the Black Country

The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country.

It forbids anyone who is a driver, rider or passenger in or on a motor vehicle to participate between the hours of 3pm and 7am in a gathering of two or more persons within the Black Country area at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

It also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The injunction covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and has a Power of Arrest attached to it which gives the police the power to arrest anyone who breaches it. Breach of an injunction is a contempt to court and if proved the court has the power to impose a sentence of imprisonment, a fine, or an order seizing a person's assets.

For the purposes of the injunction, stunts are defined as driving manoeuvres often undertaken at such gatherings including but not limited to:

Dudley Council street racing page

Email trail documents uploaded to Wolverhampton City Council website, 1 March 2024

Email trail documents uploaded to Sandwell Council website, 1 March 2024

Email trail documents uploaded to Walsall MBC website, 11 March 2024

Email trail documents uploaded to Dudley MBC website, 13 March 2024

Adam Sheen

Subject: FW: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE

E-Mail Trail from Wolverhampton City Council Confirming Requisite Documents (orders from the hearing on 27 February 2024) have been Uploaded to Wolverhampton City Council's Website in compliance with the Court's service directions

(1 MARCH 2024 08:44 hours)

From: Adam Sheen

Sent: Friday, March 1, 2024 9:03 AM

To: Paul Brown <Paul.Brown@wolverhampton.gov.uk>; Webmaster <Webmaster@wolverhampton.gov.uk>

Cc: levi.sunner@dudley.gov.uk; mark.wilson@dudley.gov.uk; mumtaz_bahadur@sandwell.gov.uk; lisa_callaghanbutler@sandwell.gov.uk; pardip_sandhu@sandwell.gov.uk; javed.iqbal@walsall.gov.uk; Pardip Nagra <Pardip.Nagra@wolverhamptonhomes.org.uk>; steve.gittins@walsall.gov.uk

Subject: RE: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE

Hi Paul,

There were two copies of plan A attached to my e-mail sending out the documents. Plan A is appended to both the injunction and power of arrest (it shows the four councils' combined area – the geographical area to which the injunction and power of arrest applies). It only needs to go on the Website once. When printed, however, it's best to put a copy of plan A behind the injunction and a further copy behind the power of arrest.

Everyone Else – I copy you into this response as you may have the same query.

Kind regards

Adam

Adam Sheen
Solicitor-Advocate (Civil & Criminal)
Tel. 01902 554926
Email: adam.sheen@wolverhampton.gov.uk

Legal Services
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG

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This e-mail is sent by or on behalf of Tracey Christie, Head of Legal Services.

From: Paul Brown <Paul.Brown@wolverhampton.gov.uk>

Sent: Friday, March 1, 2024 8:46 AM

To: Webmaster <Webmaster@wolverhampton.gov.uk>; Adam Sheen <Adam.Sheen@wolverhampton.gov.uk>
Subject: RE: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE

Sensitivity: PROTECT

@Adam Sheen please see below query from Chris?

(And thanks Chris!)

Kind regards

Paul Brown
Communications Manager
City of Wolverhampton Council
01902 555497

www.wolverhampton.gov.uk/news
www.facebook.com/wolverhamptontoday
www.twitter.com/wolvescouncil
www.youtube.com/wolverhamptontoday

From: Webmaster <Webmaster@wolverhampton.gov.uk>
Sent: Friday, March 1, 2024 8:44 AM
To: Paul Brown <Paul.Brown@wolverhampton.gov.uk>
Subject: Re: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE

Sensitivity: PROTECT

Hi Paul

No problem, all done. Just to note 2 of the pdfs seemed to be identical so I have only added 8, is that correct?

How's this - <https://www.wolverhampton.gov.uk/parking-and-roads/street-racing-injunction-application>

Thank you
Chris

From: Paul Brown <Paul.Brown@wolverhampton.gov.uk>
Date: Friday, 1 March 2024 at 07:48
To: Webmaster <Webmaster@wolverhampton.gov.uk>
Subject: FW: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE

Sensitivity: PROTECT

Please can you action this today?

We will look to tidy up the downloads section in the next couple of weeks to hide the old stuff...

Kind regards

Paul Brown
Communications Manager
City of Wolverhampton Council
01902 555497

www.wolverhampton.gov.uk/news
www.facebook.com/wolverhamptontoday
www.twitter.com/wolvescouncil
www.youtube.com/wolverhamptontoday

From: Adam Sheen <Adam.Sheen@wolverhampton.gov.uk>
Sent: Thursday, February 29, 2024 5:28 PM
To: levi.sunner@dudley.gov.uk; mark.wilson@dudley.gov.uk; mumtaz_bahadur@sandwell.gov.uk;
lisa_callaghanbutler@sandwell.gov.uk; pardip_sandhu@sandwell.gov.uk; javed.iqbal@walsall.gov.uk;
steve.gittins@walsall.gov.uk
Cc: Paul Brown <Paul.Brown@wolverhampton.gov.uk>; Pardip Nagra
<Pardip.Nagra@wolverhamptonhomes.org.uk>; michael.singleton@stiveschambers.co.uk
Subject: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE
Importance: High

Sensitivity: PROTECT

Hi Everyone,

Please find attached sealed orders from the hearing 27 February 2024.

These are:

1. The Final Injunction
2. 1st Appendix to injunction – Indices
3. 2nd Appendix to injunction – Plan A
4. The Final Power of arrest
5. 1st Appendix to the Power of Arrest – Plan A
6. Directions to Accompany the Final Injunction and Power of Arrest
7. Order joining Ms Rebecca Richold as Ninth Defendant
8. Amended Claim Form (Adding Ms Richold as a party)
9. Amended Particulars of Claim (Adding Ms Richold as a party)

These documents need adding to the dedicated car cruising injunction pages of your Websites. These documents also need to be printed and hard copies made available with the other documents that are available at your front desks. Please can you do that by **4.00 p.m. tomorrow (1 March)**.

In the coming weeks, we can discuss streamlining websites and documents left at front desks. However, for now because of 12 March deadline for making injunction and power of arrest available at front desks and 15 March for everything else, please just add these to your folders of documents left at front desks and on Websites.

Please let Paul Brown (Wolverhampton Comms) know when you have done this as he will have to produce a statement evidencing our compliance here (compliance with paragraphs 5 to 9 in the directions order

(attached)). I will serve on all named Defendants by e-mail to their solicitors (and Mr Phelps himself) all of the documents 1-9 above and I will complete certificates of service which I will forward to Paul, which Paul can then exhibit. I will do that **by 4.00 p.m. tomorrow (1 March)**.

Paul – Please can you request the neighbouring police forces (listed in paragraph 5(g) of the directions order, to publicise a link to the items 1 to 6 above or a link to our dedicated injunction pages. Can you request the Webmaster uploads all these attached documents by 4.00 p.m. tomorrow to the dedicated car cruising injunction pages of our Website please? If the neighbouring police want to link to our car cruising injunction pages rather than uploading all these documents to their website(s), that's fine.

I will forward a copy of this e-mail and ask Business Support to make a hard copy of these documents available at our Business Reception desk by **4.00 p.m. tomorrow (1 March)** and confirm to Paul when this has been done.

I will send power of arrest final injunction and appendices to PC Mark Campbell and copy in Pardip N. Pardip – if PC Campbell isn't around, please can I leave it with you to liaise with Police to get this power of arrest and injunctions on their systems as the police would with any other power of arrest.

Unless, I have missed anything in the directions., that should then fulfil our obligations in the directions order.

Adam Sheen
Solicitor-Advocate (Civil & Criminal)
Tel. 01902 554926
Email: adam.sheen@wolverhampton.gov.uk

Legal Services
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG

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Adam Sheen

Subject: FW: [EXTERNAL EMAIL] Service Requirements - Black Country Car Cruising Injunction 27 February 2024 - YOUR URGENT ATTENTION PLEASE

Excerpts of non-legally privileged E-Mail trail from Dudley MBC Confirming Dudley MBC's Website is compliant with order of 27 February 2024 (that is requisite documents have been uploaded to the Website and homepage of Dudley MBC's Website contains a prominent link to the Car Cruising Injunction pages of Dudley MBC's Website

(13 MARCH 2024 10:21 hours)

From: Levi Sunner (Law and Governance) <Levi.Sunner@dudley.gov.uk>
Sent: Wednesday, March 13, 2024 10:21 AM
To: Mark Wilson (Community Safety) <Mark.Wilson@dudley.gov.uk>; Adam Sheen <Adam.Sheen@wolverhampton.gov.uk>
Cc: Pardip Nagra <Pardip.Nagra@wolverhamptonhomes.org.uk>; Paul Brown <Paul.Brown@wolverhampton.gov.uk>; Mushtaq Ahmed-Khan <Mushtaq.Ahmed-Khan@wolverhampton.gov.uk>; Michael Singleton <michael.singleton@stiveschambers.co.uk>
Subject: RE: [EXTERNAL EMAIL] Service Requirements - Black Country Car Cruising Injunction 27 February 2024 - YOUR URGENT ATTENTION PLEASE

Sensitivity: PROTECT

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Adam,

DMBC's website should now be compliant- we're advised that all links from WCC's webpage have been copied (as we simply mirror yours).

Regards,

Levi Sunner
Solicitor/Barrister

Law & Governance - Community Safety
Finance & Legal
Dudley Council
4 Ednam Road, Dudley, DY1 1HL
01384 815429
www.dudley.gov.uk



**NEED TO REQUEST IT,
REPORT IT OR PAY IT?**
AVAILABLE ONLINE, ANYTIME



From: Adam Sheen

Sent: Tuesday, March 12, 2024 2:33 PM

To: Levi Sunner (Law and Governance <Levi.Sunner@dudley.gov.uk>; Mark Wilson (Community Safety <Mark.Wilson@dudley.gov.uk>

Cc: Paul Brown <Paul.Brown@wolverhampton.gov.uk>; Pardip Nagra <Pardip.Nagra@wolverhamptonhomes.org.uk>; michael.singleton@stiveschambers.co.uk

Subject: FW: [EXTERNAL EMAIL] Service Requirements - Black Country Car Cruising Injunction 27 February 2024 - YOUR URGENT ATTENTION PLEASE

Importance: High

<https://www.dudley.gov.uk/residents/parking-and-roads/roads-highways-and-pavements/car-cruising-injunction/>

Hi Levi,

Sorry to be a pain. Could I ask a favour of you please? Having just had a look at the car cruising pages on your Website (please see link above), I cannot see that the attached documents are showing on those Webpages. Please could you chase the people in charge of making changes to Dudley MBC's Website to get the attached documents uploaded by 4 .00 p.m. Friday 15 March 2024 per the court directions of 27 February?

Many thanks.

Kind regards

Adam

Adam Sheen
Solicitor-Advocate (Civil & Criminal)
Tel. 01902 554926
Email: adam.sheen@wolverhampton.gov.uk

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Wolverhampton City Council
Civic Centre
St Peters Square
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This e-mail is sent by or on behalf of Tracey Christie, Head of Legal Services.

From: Adam Sheen <Adam.Sheen@wolverhampton.gov.uk>
Sent: Tuesday, March 12, 2024 9:12 AM
To: Levi Sunner (Law and Governance) <Levi.Sunner@dudley.gov.uk>; Mark Wilson (Community Safety) <Mark.Wilson@dudley.gov.uk>
Cc: Paul Brown <Paul.Brown@wolverhampton.gov.uk>; Pardip Nagra <Pardip.Nagra@wolverhamptonhomes.org.uk>; michael.singleton@stiveschambers.co.uk
Subject: [EXTERNAL EMAIL] Service Requirements - Black Country Car Cruising Injunction 27 February 2024 - YOUR URGENT ATTENTION PLEASE
Importance: High

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Sensitivity: PROTECT

Good morning Levi and Mark,

Black Country Car Cruising Injunction – Orders of 27 February 2024

Please can you confirm that, in accordance with the service requirements in the above mentioned order, that you have uploaded a copy of the documents from the hearing of 27 February namely:

1. the injunction order;
2. power of arrest;
3. amended claim form;
4. amended particulars of claim; and
5. directions order (service directions)

to your Website and made copies available at your front desks. We have confirmation from all the other Claimant authorities that this has been done. If this has not been done, please could this be addressed as a matter of urgency as we have until 4 p.m. Friday 15 March to do this.

I should be grateful if you would reply by 2 p.m. today please.

Kind regards

Adam

Adam Sheen
Solicitor-Advocate (Civil & Criminal)
Tel. 01902 554926
Email: adam.sheen@wolverhampton.gov.uk

Legal Services
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG

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Adam Sheen

Subject: FW: IL2-RE: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE

E-Mail Trail from Sandwell Metropolitan Borough Council Confirming Requisite Documents (orders from the hearing on 27 February 2024) have been deposited at the Reception Desk in Sandwell Metropolitan Borough Council Offices and made available on the Website of Sandwell Metropolitan Borough Council in compliance with the Court's service directions

(1 MARCH 2024 16:32 hours)

From: Mumtaz Bahadur <mumtaz_bahadur@sandwell.gov.uk>
Sent: Friday, March 1, 2024 4:32 PM
To: Adam Sheen <Adam.Sheen@wolverhampton.gov.uk>
Cc: Lisa CallaghanButler <lisa_callaghanButler@sandwell.gov.uk>
Subject: IL2-RE: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE

Sensitivity: PROTECT

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Hello Adam, just to confirm that the orders have been uploaded onto the website and hard copies placed in reception.

Mumtaz

From: Adam Sheen <Adam.Sheen@wolverhampton.gov.uk>
Sent: 29 February 2024 17:28
To: levi.sunner@dudley.gov.uk; Mark Wilson (Community Safety) <Mark.Wilson@dudley.gov.uk>; Mumtaz Bahadur <mumtaz_bahadur@sandwell.gov.uk>; Lisa CallaghanButler <lisa_callaghanButler@sandwell.gov.uk>; Pardip Sandhu <Pardip_Sandhu@sandwell.gov.uk>; javed.iqbal@walsall.gov.uk; steve.gittins@walsall.gov.uk
Cc: Paul Brown <Paul.Brown@wolverhampton.gov.uk>; Pardip Nagra <Pardip.Nagra@wolverhamptonhomes.org.uk>; michael.singleton@stiveschambers.co.uk
Subject: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE
Importance: High

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Sensitivity: PROTECT

Hi Everyone,

Please find attached sealed orders from the hearing 27 February 2024.

These are:

1. The Final Injunction
2. 1st Appendix to injunction – Indices
3. 2nd Appendix to injunction – Plan A
4. The Final Power of arrest
5. 1st Appendix to the Power of Arrest – Plan A
6. Directions to Accompany the Final Injunction and Power of Arrest
7. Order joining Ms Rebecca Richold as Ninth Defendant
8. Amended Claim Form (Adding Ms Richold as a party)
9. Amended Particulars of Claim (Adding Ms Richold as a party)

These documents need adding to the dedicated car cruising injunction pages of your Websites. These documents also need to be printed and hard copies made available with the other documents that are available at your front desks. Please can you do that by **4.00 p.m. tomorrow (1 March)**.

In the coming weeks, we can discuss streamlining websites and documents left at front desks. However, for now because of 12 March deadline for making injunction and power of arrest available at front desks and 15 March for everything else, please just add these to your folders of documents left at front desks and on Websites.

Please let Paul Brown (Wolverhampton Comms) know when you have done this as he will have to produce a statement evidencing our compliance here (compliance with paragraphs 5 to 9 in the directions order (attached)). I will serve on all named Defendants by e-mail to their solicitors (and Mr Phelps himself) all of the documents 1-9 above and I will complete certificates of service which I will forward to Paul, which Paul can then exhibit. I will do that **by 4.00 p.m. tomorrow (1 March)**.

Paul – Please can you request the neighbouring police forces (listed in paragraph 5(g) of the directions order, to publicise a link to the items 1 to 6 above or a link to our dedicated injunction pages. Can you request the Webmaster uploads all these attached documents by 4.00 p.m. tomorrow to the dedicated car cruising injunction pages of our Website please? If the neighbouring police want to link to our car cruising injunction pages rather than uploading all these documents to their website(s), that's fine.

I will forward a copy of this e-mail and ask Business Support to make a hard copy of these documents available at our Business Reception desk by **4.00 p.m. tomorrow (1 March)** and confirm to Paul when this has been done.

I will send power of arrest final injunction and appendices to PC Mark Campbell and copy in Pardip N. Pardip – if PC Campbell isn't around, please can I leave it with you to liaise with Police to get this power of arrest and injunctions on their systems as the police would with any other power of arrest.

Unless, I have missed anything in the directions., that should then fulfil our obligations in the directions order.

Adam Sheen
Solicitor-Advocate (Civil & Criminal)
Tel. 01902 554926
Email: adam.sheen@wolverhampton.gov.uk

Legal Services
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG

LIJ017753P/02091927

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Adam Sheen

Subject: FW: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE

E-Mail Trail from Walsall Metropolitan Borough Council Confirming Requisite Documents (orders from the hearing on 27 February 2024) have been uploaded to Walsall Metropolitan Borough Council's Website in compliance with the Court's service directions

(11 MARCH 2024 12:20 hours)

From: Communications <Communications@walsall.gov.uk>
Sent: Monday, March 11, 2024 12:20 PM
To: Communications <Communications@walsall.gov.uk>; Paul Brown <Paul.Brown@wolverhampton.gov.uk>
Subject: RE: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE

Sensitivity: PROTECT

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Paul

To confirm, this has now been actioned

Natasha Mann
Communications Business Partner (Social & Economic Regeneration)
Walsall Council
07732 825926
01922 563425
www.walsall.gov.uk



Walsall Council

PROUD OF OUR PAST, OUR PRESENT AND FOR OUR FUTURE

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From: Communications <Communications@walsall.gov.uk>
Sent: Monday, March 11, 2024 11:25 AM
To: Paul Brown <Paul.Brown@wolverhampton.gov.uk>
Cc: Communications <Communications@walsall.gov.uk>
Subject: RE: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE

Hi Paull

I have passed on your email to our web team to action

Kind regards

Natasha Mann
Communications Business Partner (Social & Economic Regeneration)
Walsall Council
07732 825926
01922 563425
www.walsall.gov.uk



Walsall Council

PROUD OF OUR PAST, OUR PRESENT AND FOR OUR FUTURE

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From: Paul Brown <Paul.Brown@wolverhampton.gov.uk>
Sent: Monday, March 11, 2024 11:18 AM
To: PressOffice <PressOffice@dudley.gov.uk>; Communications <Communications@walsall.gov.uk>
Subject: FW: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE
Importance: High

CAUTION: STOP and THINK - This email originated from outside of the council. If it looks suspicious it probably is and YOU SHOULD NEVER enter your council username and password into an external link or open files attached to a suspicious email.

Sensitivity: PROTECT

Hi all

Hope you are well. Counsel says that these documents haven't been added to your street racing

pages yet as required by the High Court– please can you liaise with your webteams to get this completed and please can you confirm via email when they have been uploaded?

Thanks very much

Kind regards

Paul Brown
Communications Manager
City of Wolverhampton Council
01902 555497

www.wolverhampton.gov.uk/news
www.facebook.com/wolverhamptontoday
www.twitter.com/wolvescouncil
www.youtube.com/wolverhamptontoday

From: Adam Sheen <Adam.Sheen@wolverhampton.gov.uk>
Sent: Thursday, February 29, 2024 5:28 PM
To: levi.sunner@dudley.gov.uk; mark.wilson@dudley.gov.uk; mumtaz_bahadur@sandwell.gov.uk; lisa_callaghanbutler@sandwell.gov.uk; pardip_sandhu@sandwell.gov.uk; javed.iqbal@walsall.gov.uk; steve.gittins@walsall.gov.uk
Cc: Paul Brown <Paul.Brown@wolverhampton.gov.uk>; Pardip Nagra <Pardip.Nagra@wolverhamptonhomes.org.uk>; michael.singleton@stiveschambers.co.uk
Subject: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE
Importance: High

Sensitivity: PROTECT

Hi Everyone,

Please find attached sealed orders from the hearing 27 February 2024.

These are:

1. The Final Injunction
2. 1st Appendix to injunction – Indices
3. 2nd Appendix to injunction – Plan A
4. The Final Power of arrest
5. 1st Appendix to the Power of Arrest – Plan A
6. Directions to Accompany the Final Injunction and Power of Arrest
7. Order joining Ms Rebecca Richold as Ninth Defendant
8. Amended Claim Form (Adding Ms Richold as a party)
9. Amended Particulars of Claim (Adding Ms Richold as a party)

These documents need adding to the dedicated car cruising injunction pages of your Websites. These documents also need to be printed and hard copies made available with the other documents that are available at your front desks. Please can you do that by **4.00 p.m. tomorrow (1 March)**.

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Please let Paul Brown (Wolverhampton Comms) know when you have done this as he will have to produce a statement evidencing our compliance here (compliance with paragraphs 5 to 9 in the directions order (attached)). I will serve on all named Defendants by e-mail to their solicitors (and Mr Phelps himself) all of the documents 1-9 above and I will complete certificates of service which I will forward to Paul, which Paul can then exhibit. I will do that **by 4.00 p.m. tomorrow (1 March)**.

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I will forward a copy of this e-mail and ask Business Support to make a hard copy of these documents available at our Business Reception desk by **4.00 p.m. tomorrow (1 March)** and confirm to Paul when this has been done.

I will send power of arrest final injunction and appendices to PC Mark Campbell and copy in Pardip N. Pardip – if PC Campbell isn't around, please can I leave it with you to liaise with Police to get this power of arrest and injunctions on their systems as the police would with any other power of arrest.

Unless, I have missed anything in the directions., that should then fulfil our obligations in the directions order.

Adam Sheen
Solicitor-Advocate (Civil & Criminal)
Tel. 01902 554926
Email: adam.sheen@wolverhampton.gov.uk

Legal Services
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG

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Statement of:	Paul Brown
Statement no:	20
For:	Claimants
Date:	26 April 2024
Exhibits:	PB20A – PB20I

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

**CLAIM NO: KB-2022-
BHM000188**

B E T W E E N:

- (1) WOLVERHAMPTON CITY COUNCIL**
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL**
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL**
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

- (5) Mr ANTHONY GALE**
- (6) Miss WIKTORIA SZCZUBLINSKA**
- (7) Mr ISA IQBAL**
- (8) Mr MASON PHELPS**
- (9) Ms REBECCA RICHOLD**

Defendants

EXHIBIT PB20D

This is the document referred to as "Exhibit PB20D" in the witness statement of Paul Brown dated 26 April 2024

i) Statement of: Paul Brown
ii) Statement No: 20
iii) For: Claimants
iv) Dated: 26.04.2024
v) Exhibits: PB20A-PB20I

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO: KB-2022-BHM000188

B E T W E E N:

- (1) WOLVERHAMPTON CITY COUNCIL
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

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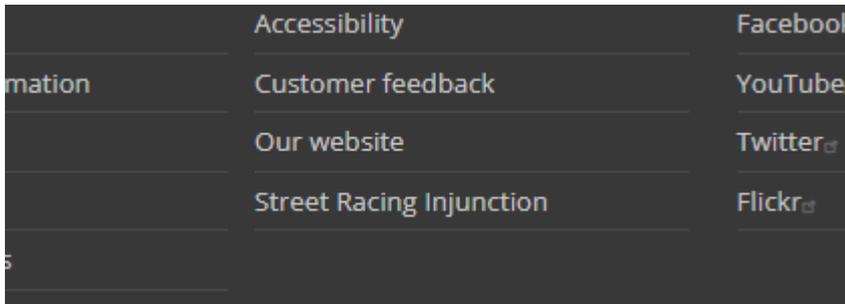
4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

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- (6) Miss WIKTORIA SZCZUBLINSKA
- (7) Mr ISA IQBAL
- (8) Mr MASON PHELPS
- (9) Ms REBECCA RICHOLD

Defendants

EXHIBIT PB20D

This is the document referred to as "EXHIBIT PB20D" in the twentieth statement of Paul Brown dated 26 April 2024.



City of Wolverhampton Council homepage, 29 February 2024

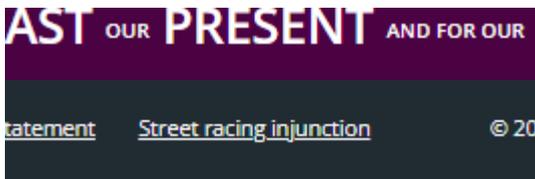
[Modern Slavery](#) [Car Cruising Ban - High Court](#)



Dudley Council homepage, 29 February 2024



Sandwell Council homepage, 29 February 2024



Walsall Council homepage, 29 February 2024

Statement of:	Paul Brown
Statement no:	20
For:	Claimants
Date:	26 April 2024
Exhibits:	PB20A – PB20I

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

**CLAIM NO: KB-2022-
BHM000188**

B E T W E E N:

- (1) WOLVERHAMPTON CITY COUNCIL**
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL**
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL**
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

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4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

- (5) Mr ANTHONY GALE**
- (6) Miss WIKTORIA SZCZUBLINSKA**
- (7) Mr ISA IQBAL**
- (8) Mr MASON PHELPS**
- (9) Ms REBECCA RICHOLD**

Defendants

EXHIBIT PB20E

This is the document referred to as "Exhibit PB20E" in the witness statement of Paul Brown dated 26 April 2024

i) Statement of: Paul Brown
ii) Statement No: 20
iii) For: Claimants
iv) Dated: 26.04.2024
v) Exhibits: PB20A-PB20I

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO: KB-2022-BHM000188

B E T W E E N:

- (1) WOLVERHAMPTON CITY COUNCIL
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

- (5) Mr ANTHONY GALE
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- (7) Mr ISA IQBAL
- (8) Mr MASON PHELPS
- (9) Ms REBECCA RICHOLD

Defendants

EXHIBIT PB20E

This is the document referred to as "EXHIBIT PB20E" in the twentieth statement of Paul Brown dated 26 April 2024.

Email trail denoting documents placed at Wolverhampton City Council reception, 1 March 2024

Email trail denoting documents placed at Sandwell Council reception, 1 March 2024

Email trail denoting documents placed at Walsall Council reception, 1 March 2024

Email trail denoting documents placed at Dudley Council reception, 12 March 2024

Adam Sheen

Subject: FW: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE

Attachments: 2091936 - Plan A (Sealed) 27 February 2024.pdf; 2091934 - Indices (Sealed) 27 February 2024.pdf; 2091936 - Plan A (Sealed) 27 February 2024.pdf; 2091933 - Final Orders - Power of Arrest (Black Country) (Sealed).pdf; 2091931 - Final Injunction (Black Country) (Sealed) 27 February 2024.pdf; 2091930 - Directions Accompanying Final Order (Black Country) (Sealed) 27 February 2024.pdf; 2091929 - Amended Particulars of Claim (Version 6) (Sealed) 27 February 2024.pdf; 2091928 - Amended Claim Form (Version 6) (Sealed) 27 February 2024.pdf; 2091935 - Order joining Rebecca Richold as a party (Sealed) 27 February 2024.pdf

Importance: High

E- Mail Trail from Wolverhampton City Council Confirming Requisite Documents (orders from the hearing on 27 February 2024) have been deposited at the Reception Desk in Wolverhampton City Council's Offices in compliance with the Court's service directions

(1 MARCH 2024 09:40 hours)

From: Sean Coughlan <Sean.Coughlan@wolverhampton.gov.uk>
Sent: Friday, March 1, 2024 9:40 AM
To: Adam Sheen <Adam.Sheen@wolverhampton.gov.uk>; Paul Brown <Paul.Brown@wolverhampton.gov.uk>
Cc: Steve Galloway <Steve.Galloway@wolverhampton.gov.uk>
Subject: FW: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE
Importance: High

Sensitivity: PROTECT

Morning Adam / Paul,

I can confirm that all of the attached documents have now been placed at Business Reception.

Kind Regards

Sean Coughlan
Business Support Administrator
Central Resources
Tel. Office: 01902 552415

[E-mail: sean.coughlan@wolverhampton.gov.uk](mailto:sean.coughlan@wolverhampton.gov.uk)
City of Wolverhampton Council

From: Business Support – Central Resources <Central.Resources.BSU@wconline.onmicrosoft.com>
Sent: Friday, March 1, 2024 8:49 AM
To: Sean Coughlan <Sean.Coughlan@wolverhampton.gov.uk>

Subject: FW: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE
Importance: High

Sensitivity: PROTECT

Morning Sean,

Any chance you can print the attached off for storing on Business Reception please?

Thanks,

Steve Galloway
Business Support Team Leader
Central Resources
Tel. Office: 01902 554284

[E-mail: Steve.Galloway@wolverhampton.gov.uk](mailto:Steve.Galloway@wolverhampton.gov.uk)
City of Wolverhampton Council

From: Adam Sheen <Adam.Sheen@wolverhampton.gov.uk>
Sent: Thursday, February 29, 2024 5:38 PM
To: Business Support – Central Resources <Central.Resources.BSU@wcconline.onmicrosoft.com>
Cc: Paul Brown <Paul.Brown@wolverhampton.gov.uk>
Subject: FW: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE
Importance: High

Sensitivity: PROTECT

Hi Everyone,

Please could you print, single-sided and in colour and hole-punch the attached documents in the order below.

1. The Final Injunction
2. 1st Appendix to injunction – Indices
3. 2nd Appendix to injunction – Plan A
4. The Final Power of arrest
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7. Order joining Ms Rebecca Richold as Ninth Defendant
8. Amended Claim Form (Adding Ms Richold as a party)
9. Amended Particulars of Claim (Adding Ms Richold as a party)

Once printed, please place at the front of volume one of the car cruising files (in front of the index) that is left at our Business Reception desk. In the coming weeks, I will advise on streamlining the documents left at our front desks. However, we have a tight deadline in a court order to get hard

copies of these documents left at our front desks (Business Reception is the front desk for these purposes) **by 4.00 p.m. tomorrow - 1 March.**

Please can you let me and Paul Brown know when this has been done (very brief confirmation e-mail will do).

Any queries in the matter, please call me.

Kind regards

Adam

Adam Sheen
Solicitor-Advocate (Civil & Criminal)
Tel. 01902 554926
Email: adam.sheen@wolverhampton.gov.uk

Legal Services
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG

LIJ017753P/02091983

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This e-mail is sent by or on behalf of Tracey Christie, Head of Legal Services.

From: Adam Sheen

Sent: Thursday, February 29, 2024 5:28 PM

To: levi.sunner@dudley.gov.uk; mark.wilson@dudley.gov.uk; mumtaz_bahadur@sandwell.gov.uk; lisa_callaghanbutler@sandwell.gov.uk; pardip_sandhu@sandwell.gov.uk; javed.iqbal@walsall.gov.uk; steve.gittins@walsall.gov.uk

Cc: Paul Brown <Paul.Brown@wolverhampton.gov.uk>; Pardip Nagra

<Pardip.Nagra@wolverhamptonhomes.org.uk>; michael.singleton@stiveschambers.co.uk

Subject: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE

Importance: High

Hi Everyone,

Please find attached sealed orders from the hearing 27 February 2024.

These are:

1. The Final Injunction
2. 1st Appendix to injunction – Indices
3. 2nd Appendix to injunction – Plan A
4. The Final Power of arrest
5. 1st Appendix to the Power of Arrest – Plan A
6. Directions to Accompany the Final Injunction and Power of Arrest
7. Order joining Ms Rebecca Richold as Ninth Defendant
8. Amended Claim Form (Adding Ms Richold as a party)
9. Amended Particulars of Claim (Adding Ms Richold as a party)

These documents need adding to the dedicated car cruising injunction pages of your Websites. These documents also need to be printed and hard copies made available with the other documents that are available at your front desks. Please can you do that by **4.00 p.m. tomorrow (1 March)**.

In the coming weeks, we can discuss streamlining websites and documents left at front desks. However, for now because of 12 March deadline for making injunction and power of arrest available at front desks and 15 March for everything else, please just add these to your folders of documents left at front desks and on Websites.

Please let Paul Brown (Wolverhampton Comms) know when you have done this as he will have to produce a statement evidencing our compliance here (compliance with paragraphs 5 to 9 in the directions order (attached)). I will serve on all named Defendants by e-mail to their solicitors (and Mr Phelps himself) all of the documents 1-9 above and I will complete certificates of service which I will forward to Paul, which Paul can then exhibit. I will do that **by 4.00 p.m. tomorrow (1 March)**.

Paul – Please can you request the neighbouring police forces (listed in paragraph 5(g) of the directions order, to publicise a link to the items 1 to 6 above or a link to our dedicated injunction pages. Can you request the Webmaster uploads all these attached documents by 4.00 p.m. tomorrow to the dedicated car cruising injunction pages of our Website please? If the neighbouring police want to link to our car cruising injunction pages rather than uploading all these documents to their website(s), that's fine.

I will forward a copy of this e-mail and ask Business Support to make a hard copy of these documents available at our Business Reception desk by **4.00 p.m. tomorrow (1 March)** and confirm to Paul when this has been done.

I will send power of arrest final injunction and appendices to PC Mark Campbell and copy in Pardip N. Pardip – if PC Campbell isn't around, please can I leave it with you to liaise with Police to get this power of arrest and injunctions on their systems as the police would with any other power of arrest.

Unless, I have missed anything in the directions., that should then fulfil our obligations in the directions order.

Adam Sheen
Solicitor-Advocate (Civil & Criminal)
Tel. 01902 554926
Email: adam.sheen@wolverhampton.gov.uk

Legal Services
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG

LIJ017753P/02091927

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This e-mail is sent by or on behalf of Tracey Christie, Head of Legal Services.

Adam Sheen

Subject: FW: [EXTERNAL EMAIL] Service Requirements - Black Country Car Cruising Injunction 27 February 2024 - YOUR URGENT ATTENTION PLEASE

E-Mail from Dudley MBC Confirming Requisite Documents (orders from the hearing on 27 February 2024) have been deposited at the Reception Desk in Dudley Metropolitan Borough Council's Offices in compliance with the Court's service directions

(12 MARCH 2024 13:25 hours)

From: Levi Sunner (Law and Governance) <Levi.Sunner@dudley.gov.uk>
Sent: Tuesday, March 12, 2024 1:25 PM
To: Adam Sheen <Adam.Sheen@wolverhampton.gov.uk>; Mark Wilson (Community Safety) <Mark.Wilson@dudley.gov.uk>
Cc: Paul Brown <Paul.Brown@wolverhampton.gov.uk>; Pardip Nagra <Pardip.Nagra@wolverhamptonhomes.org.uk>; michael.singleton@stiveschambers.co.uk
Subject: RE: [EXTERNAL EMAIL] Service Requirements - Black Country Car Cruising Injunction 27 February 2024 - YOUR URGENT ATTENTION PLEASE

Sensitivity: PROTECT

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Adam,

Yes, these steps have been complied with- whilst on leave, Mark contacted the relevant departments and circulated the relevant docs.

Regards,

Levi Sunner
Solicitor/Barrister

Law & Governance - Community Safety
Finance & Legal
Dudley Council
4 Ednam Road, Dudley, DY1 1HL
01384 815429
www.dudley.gov.uk



From: Adam Sheen <Adam.Sheen@wolverhampton.gov.uk>
Sent: Tuesday, March 12, 2024 9:12 AM
To: Levi Sunner (Law and Governance) <Levi.Sunner@dudley.gov.uk>; Mark Wilson (Community Safety) <Mark.Wilson@dudley.gov.uk>
Cc: Paul Brown <Paul.Brown@wolverhampton.gov.uk>; Pardip Nagra <Pardip.Nagra@wolverhamptonhomes.org.uk>; michael.singleton@stiveschambers.co.uk
Subject: [EXTERNAL EMAIL] Service Requirements - Black Country Car Cruising Injunction 27 February 2024 - YOUR URGENT ATTENTION PLEASE
Importance: High

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Sensitivity: PROTECT

Good morning Levi and Mark,

Black Country Car Cruising Injunction – Orders of 27 February 2024

Please can you confirm that, in accordance with the service requirements in the above mentioned order, that you have uploaded a copy of the documents from the hearing of 27 February namely:

- (i) the injunction order;
- (ii) power of arrest;
- (iii) amended claim form;
- (iv) amended particulars of claim; and
- (v) directions order (service directions)

to your Website and made copies available at your front desks. We have confirmation from all the other Claimant authorities that this has been done. If this has not been done, please could this be addressed as a matter of urgency as we have until 4 p.m. Friday 15 March to do this.

I should be grateful if you would reply by 2 p.m. today please.

Kind regards

Adam

Adam Sheen
Solicitor-Advocate (Civil & Criminal)
Tel. 01902 554926
Email: adam.sheen@wolverhampton.gov.uk

Legal Services
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG

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Please consider the environment - do you need to print this e-mail?

Adam Sheen

Subject: FW: II2-RE: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE

E-Mail Trail from Sandwell Metropolitan Borough Council Confirming Requisite Documents (orders from the hearing on 27 February 2024) have been deposited at the Reception Desk in Sandwell Metropolitan Borough Council Offices and made available on the Website of Sandwell Metropolitan Borough Council in compliance with the Court's service directions

(1 MARCH 2024 16:32 hours)

From: Mumtaz Bahadur <mumtaz_bahadur@sandwell.gov.uk>
Sent: Friday, March 1, 2024 4:32 PM
To: Adam Sheen <Adam.Sheen@wolverhampton.gov.uk>
Cc: Lisa CallaghanButler <lisa_callaghanButler@sandwell.gov.uk>
Subject: II2-RE: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE

Sensitivity: PROTECT

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hello Adam, just to confirm that the orders have been uploaded onto the website and hard copies placed in reception.

Mumtaz

From: Adam Sheen <Adam.Sheen@wolverhampton.gov.uk>
Sent: 29 February 2024 17:28
To: levi.sunner@dudley.gov.uk; Mark Wilson (Community Safety) <Mark.Wilson@dudley.gov.uk>; Mumtaz Bahadur <mumtaz_bahadur@sandwell.gov.uk>; Lisa CallaghanButler <lisa_callaghanButler@sandwell.gov.uk>; Pardip Sandhu <Pardip_Sandhu@sandwell.gov.uk>; javed.iqbal@walsall.gov.uk; steve.gittins@walsall.gov.uk
Cc: Paul Brown <Paul.Brown@wolverhampton.gov.uk>; Pardip Nagra <Pardip.Nagra@wolverhamptonhomes.org.uk>; michael.singleton@stiveschambers.co.uk
Subject: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE
Importance: High

CAUTION: This email originated from outside of the Council / Children's Trust. Do not click links or open attachments

Sensitivity: PROTECT

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Please find attached sealed orders from the hearing 27 February 2024.

These are:

1. The Final Injunction
2. 1st Appendix to injunction – Indices
3. 2nd Appendix to injunction – Plan A
4. The Final Power of arrest
5. 1st Appendix to the Power of Arrest – Plan A
6. Directions to Accompany the Final Injunction and Power of Arrest
7. Order joining Ms Rebecca Richold as Ninth Defendant
8. Amended Claim Form (Adding Ms Richold as a party)
9. Amended Particulars of Claim (Adding Ms Richold as a party)

These documents need adding to the dedicated car cruising injunction pages of your Websites. These documents also need to be printed and hard copies made available with the other documents that are available at your front desks. Please can you do that by **4.00 p.m. tomorrow (1 March)**.

In the coming weeks, we can discuss streamlining websites and documents left at front desks. However, for now because of 12 March deadline for making injunction and power of arrest available at front desks and 15 March for everything else, please just add these to your folders of documents left at front desks and on Websites.

Please let Paul Brown (Wolverhampton Comms) know when you have done this as he will have to produce a statement evidencing our compliance here (compliance with paragraphs 5 to 9 in the directions order (attached)). I will serve on all named Defendants by e-mail to their solicitors (and Mr Phelps himself) all of the documents 1-9 above and I will complete certificates of service which I will forward to Paul, which Paul can then exhibit. I will do that **by 4.00 p.m. tomorrow (1 March)**.

Paul – Please can you request the neighbouring police forces (listed in paragraph 5(g) of the directions order, to publicise a link to the items 1 to 6 above or a link to our dedicated injunction pages. Can you request the Webmaster uploads all these attached documents by 4.00 p.m. tomorrow to the dedicated car cruising injunction pages of our Website please? If the neighbouring police want to link to our car cruising injunction pages rather than uploading all these documents to their website(s), that's fine.

I will forward a copy of this e-mail and ask Business Support to make a hard copy of these documents available at our Business Reception desk by **4.00 p.m. tomorrow (1 March)** and confirm to Paul when this has been done.

I will send power of arrest final injunction and appendices to PC Mark Campbell and copy in Pardip N. Pardip – if PC Campbell isn't around, please can I leave it with you to liaise with Police to get this power of arrest and injunctions on their systems as the police would with any other power of arrest.

Unless, I have missed anything in the directions., that should then fulfil our obligations in the directions order.

Adam Sheen
Solicitor-Advocate (Civil & Criminal)
Tel. 01902 554926
Email: adam.sheen@wolverhampton.gov.uk

Legal Services
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG

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Adam Sheen

Subject: FW: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE

E-Mail Trail from Walsall Metropolitan Borough Council Confirming Requisite Documents (orders from the hearing on 27 February 2024) have been deposited at the Reception Desk in Walsall Metropolitan Borough Council's Offices in compliance with the Court's service directions

(1 MARCH 2024 10:13 hours)

From: Davinder Dhesei <Davinder.Dhesei@walsall.gov.uk> **On Behalf Of** Javed Iqbal
Sent: Friday, March 1, 2024 10:13 AM
To: Adam Sheen <Adam.Sheen@wolverhampton.gov.uk>
Subject: RE: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Adam,

I hope you are well and great job on the street racing injunction.

I have printed off copies of the documents and placed them in a folder at the Reception Desk at the Council House.

Kind regards.

Davinder Dhesei
Senior Legal Support Officer
Walsall Council
01922 654819
www.walsall.gov.uk



Disclaimer: The information in this message should be regarded as confidential and is intended for the addressee only unless explicitly stated. If you have received this message in error it must be deleted and the sender notified. The views expressed in this message are personal and not necessarily those of Walsall Council unless explicitly stated. E-mails sent or received from Walsall Council may be the subject of a request under Data Protection, Freedom of Information or Environmental Information legislation and therefore could be disclosed to third parties. We strongly advise you not to email any information, which if disclosed to unrelated third parties would be likely to cause harm or distress. If you have an enquiry related to your confidentiality or data protection, please visit the council data protection pages on our website.

From: Adam Sheen <Adam.Sheen@wolverhampton.gov.uk>
Sent: 29 February 2024 17:28
To: levi.sunner@dudley.gov.uk; mark.wilson@dudley.gov.uk; mumtaz_bahadur@sandwell.gov.uk;
lisa_callaghanbutler@sandwell.gov.uk; pardip_sandhu@sandwell.gov.uk; Javed Iqbal <Javed.Iqbal@walsall.gov.uk>;
Steve Gittins <Steve.Gittins@walsall.gov.uk>

Cc: Paul Brown <Paul.Brown@wolverhampton.gov.uk>; Pardip Nagra
<Pardip.Nagra@wolverhamptonhomes.org.uk>; michael.singleton@stiveschambers.co.uk
Subject: Final Sealed Orders from Hearing 27 February 2024 - YOUR URGENT ATTENTION PLEASE
Importance: High

CAUTION: STOP and THINK - This email originated from outside of the council. If it looks suspicious it probably is and YOU SHOULD NEVER enter your council username and password into an external link or open files attached to a suspicious email.

Sensitivity: PROTECT

Hi Everyone,

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I will forward a copy of this e-mail and ask Business Support to make a hard copy of these documents available at our Business Reception desk by **4.00 p.m. tomorrow (1 March)** and confirm to Paul when this has been done.

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Adam Sheen
Solicitor-Advocate (Civil & Criminal)
Tel. 01902 554926
Email: adam.sheen@wolverhampton.gov.uk

Legal Services
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St Peters Square
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WV1 1RG

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Statement of:	Paul Brown
Statement no:	20
For:	Claimants
Date:	26 April 2024
Exhibits:	PB20A – PB20I

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

**CLAIM NO: KB-2022-
BHM000188**

B E T W E E N:

- (1) WOLVERHAMPTON CITY COUNCIL**
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL**
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL**
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

- (5) Mr ANTHONY GALE**
- (6) Miss WIKTORIA SZCZUBLINSKA**
- (7) Mr ISA IQBAL**
- (8) Mr MASON PHELPS**
- (9) Ms REBECCA RICHOLD**

Defendants

EXHIBIT PB20F

This is the document referred to as "Exhibit PB20F" in the witness statement of Paul Brown dated 26 April 2024

i) Statement of: Paul Brown
ii) Statement No: 20
iii) For: Claimants
iv) Dated: 26.04.2024
v) Exhibits: PB20A-PB20I

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO: KB-2022-BHM000188

B E T W E E N:

- (1) WOLVERHAMPTON CITY COUNCIL
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

- (5) Mr ANTHONY GALE
- (6) Miss WIKTORIA SZCZUBLINSKA
- (7) Mr ISA IQBAL
- (8) Mr MASON PHELPS
- (9) Ms REBECCA RICHOLD

Defendants

EXHIBIT PB20F

This is the document referred to as "EXHIBIT PB20F" in the twentieth statement of Paul Brown dated 26 April 2024.



Street racing digital roadsigns

The injunction is advertised by signs in key places on the highway, these signs can be seen in the Downloads section. Here you can find the locations of these signs. If signs are missing or damaged, please report this on 01902 551155 or [Contact Roads](#).

Signage reporting mechanisms, City of Wolverhampton Council

If you spot street racing injunction signs are damaged or missing, please [report damaged or missing signs online to the council](#) or call the highways team on **0121 368 1177**.

Signage reporting mechanisms, Sandwell Council

Street racing signage

You can view the location of street racing signage around the borough in our map.

To reveal the location of a sign, click or tap on the green or pink circle icons.

You can also search using the hamburger menu (three lines at top left of the map).

Click or tap the menu, then enter your postcode. The map will zoom to your location and show where your nearest street racing sign is.

To report any issues with the signs please [contact the community protection team](#).

Signage reporting mechanisms, Walsall Council

The injunction is advertised by signs in key places on the highway, these signs can be seen in the Downloads section. Here you can find the locations of these signs. If signs are missing or damaged, please report this on 01902 551155

Signage reporting mechanisms, Dudley Council

i) Statement of: Paul Brown
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 16.9.2022
v) Exhibits: PB1

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF PAUL STEVEN BROWN

I, PAUL STEVEN BROWN of the City of Wolverhampton Council, Civic Centre, St Peter's Square, Wolverhampton, WV1 1RG WILL SAY AS FOLLOWS:

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief.
2. The City of Wolverhampton Council is the authority which is leading the joint application of the Councils of Wolverhampton, Dudley, Sandwell and Walsall (hereinafter referred to as the "Black Country Boroughs") seeking injunctive relief to restrain street racing in the Black Country Boroughs.

3. I have been employed since 25 June 2007 as a Senior Communications Adviser and latterly Communications Manager in the communications team of the City of Wolverhampton Council.
4. In collaboration with my colleagues Pardip Nagra (ASB Team Leader) and Adam Sheen (Senior Solicitor, Legal Services) a communications plan has been developed, with the initial steps implemented, initially to raise awareness of the application to the High Court for a new street racing injunction for the Black Country Area and, should the court be minded to grant this, to promote the existence of the injunction, and the power of arrest, once it is formally in place.
5. Recognising this is a joint enterprise, I have been liaising closely with my counterparts in the communications teams of Dudley, Sandwell and Walsall Councils and West Midlands Police.
6. For ease of reference, the communications plan is attached as "**Exhibit PB1**", with associated appendices.

STATEMENT OF TRUTH

I believe that the facts stated in this Witness Statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without and honest belief in its truth

Full Name: PAUL STEVEN BROWN Position: COMMUNICATIONS
MANAGER

Name of Claimant: City of Wolverhampton Council

Signed



Print Name **PAUL STEVEN BROWN**

Dated **16/9/2022**

i) Statement of: Paul Brown
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 16.9.2022
v) Exhibits: PB1

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT PB1

This is the document referred to as "**Exhibit PB1**" in the witness statement of Paul Brown dated 16 September 2022.

Councils and police seek new ban on street racing in region

Released: Monday 4 July, 2022



Wolverhampton, Dudley, Sandwell and Walsall councils have announced they will be applying for a new High Court injunction to ban "street racing" in the Black Country.

Working in partnership with West Midlands Police, they will return to the High Court later this year to seek a ban on street racing, also known as car cruising, across the four boroughs.

If granted, the injunction would forbid people from participating in, attending, promoting, organising or publicising a street racing event. Anyone ignoring the injunction could be arrested, face penalties such as up to two years' imprisonment or an unlimited fine, or have their assets seized.

The councils are expected to issue proceedings in a few weeks' time, with a court date likely to be later this summer or early autumn.

For the purposes of the application, street racing is defined as the act of drivers of cars, motorbikes or quadbikes meeting to race or show off in their vehicles.

A similar injunction had previously been in force in the Black Country for a period of six years, and had helped dramatically reduce instances of street racing across the region in that time.

The new application is once again being led by the City of Wolverhampton Council on behalf of the four Black Country local authorities and West Midlands Police.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing, said: "Street racing is noisy, dangerous and illegal and some events have resulted in serious injuries and even death.

"Over the last few years, we and the police have received hundreds of complaints about dangerous driving, excessive noise, littering and people and vehicles obstructing highways and residential or business properties.

"Law abiding drivers can also feel intimidated when, through no fault of their own, they inadvertently find themselves in the middle of a street race.

"The previous Black Country-wide injunction proved incredibly effective in reducing instances of street racing across the region. However, the problem still persists in some areas, and has started to grow again since the original injunction expired.

"It is important that the authorities have the powers they need to crack down on street racing as and when it occurs and so we are pleased to be in a position where we will shortly launch new proceedings and are hopeful that we can secure an injunction as soon as possible."

People are invited to submit comments and observations regarding street racing and the application for a new injunction by emailing litigation@wolverhampton.gov.uk. Comments received may be presented as evidence to the High Court.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

ENDS

Notes to editors:

1/ For more information or to arrange an interview, please contact Paul Brown, Communications Manager, on 01902 555497 or email paul.brown@wolverhampton.gov.uk.

- **Issued by the City of Wolverhampton Council's Corporate Communications Team.**
- **For more information, please call 01902 555439.**
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 - www.twitter.com/wolvescouncil
 - www.facebook.com/wolverhamptontoday
 - www.youtube.com/wolverhamptontoday



Wolverhampton Today
Published by Orlo · 4 July · 🌐

Wolverhampton, Dudley, Sandwell and Walsall councils and West Midlands Police have announced they will be applying for a new High Court injunction to ban "street racing" in the Black Country.

If granted, the injunction would forbid people from participating in, attending, promoting, organising or publicising a street racing event. Anyone ignoring the injunction could be arrested, face penalties such as up to 2 years' imprisonment or an unlimited fine, or have their assets s... [See more](#)

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Lisa Tromans
Yeah yeah
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Shaun Baggott
It pisses me off, When the police class car enthusiasts the same as boy racers. We pull up on a car

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Wolves Council ✓
@WolvesCouncil

[@WolvesCouncil](#), [@dudleymbc](#), [@sandwellcouncil](#), [@WalsallCouncil](#) & [@WMPolice](#) have announced they will be applying for a new High Court injunction to ban "street racing" in the Black Country. Full story: orlo.uk/bjPia



12:47 PM · Jul 4, 2022 · Orlo

Sandwell Council @sandwellcouncil · Jul 4

We're joining forces with [@dudleymbc](#), [@WalsallCouncil](#), [@WolvesCouncil](#) and [@WMPolice](#) to apply for a new High Court injunction to ban "street racing" in the Black Country 📢

Wolves Council ✓ @WolvesCouncil · Jul 4

[@WolvesCouncil](#), [@dudleymbc](#), [@sandwellcouncil](#), [@WalsallCouncil](#) & [@WMPolice](#) have announced they will be applying for a new High Court injunction to ban "street racing" in the Black Country. Full story: orlo.uk/bjPia



1 7 15 📤

Sandwell 4 July · 🌐

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Wolverhampton Today
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Wolverhampton, Dudley, Sandwell and Walsall councils and West Midlands Police have announced they will be applying for a new High Court injunction to ban "stree... [See more](#)

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Our Walsall 4 July · 🌐

Read more about the new High Court injunction application to ban 'street racing' in the Black Country 📢



Wolverhampton Today
4 July · 🌐

Wolverhampton, Dudley, Sandwell and Walsall councils and West Midlands Police have announced they will be applying for a new High Court injunction to ban "stree... [See more](#)

10

Walsall Council @WalsallCouncil · Jul 4

Read more about the new High Court injunction application to ban 'street racing' in the Black Country 📢

Wolves Council ✓ @WolvesCouncil · Jul 4

[@WolvesCouncil](#), [@dudleymbc](#), [@sandwellcouncil](#), [@WalsallCouncil](#) & [@WMPolice](#) have announced they will be applying for a new High Court injunction to ban "street racing" in the Black Country. Full story: orlo.uk/bjPia



p 89

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Dudley borough 4 July · 🌐

Dudley borough 7 July · 🌐

Wolverhampton Police 4 July · 🌐



Wolverhampton Today 4 July · 🌐

Wolverhampton, Dudley, Sandwell and Walsall councils and West Midlands Police have announced they will be applying for a new High Court injunction to ban "stree... See more

4

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Street racing reports filed as councils build case for new injunction

Released: Monday 25 July, 2022



Authorities have been inundated with reports of street racing after it was announced that councils in the Black Country are set to seek a new ban on the activity.

Wolverhampton, Dudley, Sandwell and Walsall councils, together with West Midlands Police, will return to the High Court this autumn to apply for a new injunction prohibiting street racing, defined as the act of drivers of cars, motorbikes or quadbikes meeting to race or show off in their vehicles.

And the City of Wolverhampton Council, which is leading on the application, has received numerous comments from residents and businesses after it invited observations regarding street racing from members of the public.

Reports have been filed of street racing activities at Waterfront Business Park in Merry Hill, on Mill Race Lane, Stourbridge, on the Halesowen bypass, on West Bromwich Road in Walsall, on Blackwood Avenue, Wednesfield and on Trinity Way, West Bromwich.

The council has also received reports of street racing activities in Aldridge, on Spring Vale Business Park, Bilston, on Essington Road, New Invention and along the A34 between Walsall and Broadway.

The council is expected to issue proceedings for the new injunction in the next few weeks, with a court date likely to be later this summer or early autumn.

A similar injunction had previously been in force in the Black Country between 2015 and 2021 and helped dramatically reduce instances of street racing across the region.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing, said: "The sheer number of comments we have received over the last couple of weeks shows just how much of an issue street racing continues to be in the Black Country, and why it is so important that we seek a fresh injunction to ban it.

"Let's be very clear, street racing is anti-social, noisy and dangerous, and from the feedback we are getting we can very clearly see the impact it is having on people and businesses that have to put up with it.

"The previous Black Country-wide injunction proved very effective in reducing instances of street racing across the region. But the problem still persists in some areas and is starting to grow once more.

"We want to ensure that the authorities, whether that is the police or local councils, have the powers they need to crack down on street racing as and when it occurs.

"The evidence we have received since announcing our intention to seek a new injunction is helping us to build our case, and I would encourage anyone who has witnessed incidents of street racing in the Black Country to get in touch and share their experiences, if they haven't already."

People are invited to submit comments and observations regarding street racing and the application for a new injunction by emailing litigation@wolverhampton.gov.uk. Comments received may be presented as evidence to the High Court.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

ENDS

Notes to editors:

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Wolverhampton Today
Published by Orlo · 25 July at 15:11 ·

The council has been inundated with reports of street racing after it was announced that authorities in the Black Country are set to seek a new ban on the activity.

The four local councils, together with West Midlands Police, will return to the High Court this autumn to apply for a new injunction prohibiting street racing, defined as the act of drivers of cars, motorbikes or quadbikes meeting to race or show off in their vehicles.

Since announcing the news, authorities have...
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Michal Malon
Thanks for letting everyone know.

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Wolves Council
@WolvesCouncil

We have been inundated with reports of street racing after we announced that we, @dudleymbc, @sandwellcouncil, @WalsallCouncil and @WMPolice are seek a new ban on the activity. Full story: orlo.uk/KmGcM (1/4)

3:12 PM · Jul 25, 2022 · Orlo

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Sandwell
8 August at 12:39 ·

Wolverhampton Today
25 July ·

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25 August at 14:39 ·

Wolverhampton Today
25 August at 13:01 ·

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Dudley borough
3 August ·

We're working with our fellow Black Country authorities to apply for a new injunction to prohibit street racing

Wolverhampton Today
25 July ·

The council has been inundated with reports of street racing after it was announced that authorities in the Black Country are set to seek a new ban on the activ... [See more](#)

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Dudley Council @dudleymbc · Aug 3

We're working with our fellow Black Country authorities to apply for a new injunction to prohibit **street racing**

Wolves Council @WolvesCouncil · Jul 25
We have been inundated with reports of street racing after we announced that we, @dudleymbc, @sandwellcouncil, @WalsallCouncil and @WMPolice are seek a new ban on the activity. Full story: orlo.uk/KmGcM (1/4)
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Councils and police in application for new street racing ban

Released: Thursday 25 August, 2022



The four Black Country local authorities and West Midlands Police are in the process of applying for a new High Court injunction to ban "street racing" in the Black Country.

The final touches are currently being put to paperwork and will be filed with the High Court in the next few weeks, with a hearing date likely this autumn.

The application is being led by the City of Wolverhampton Council and will seek a ban on street racing, also known as car cruising, across the four boroughs.

If granted, the injunction would forbid people from participating in, attending, promoting, organising or publicising a street racing event. Anyone ignoring the injunction could be arrested, face penalties such as up to two years' imprisonment or an unlimited fine, or have their assets seized.

For the purposes of the application, street racing is defined as the act of drivers of cars, motorbikes or quadbikes meeting to race or show off in their vehicles.

A similar injunction was previously in force in the Black Country for a six year period, and helped dramatically reduce instances of street racing across the region in that time.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing, said: "Street racing is noisy, dangerous and illegal and some events have resulted in serious injuries and even death.

“Over the last few years, we and the police have received hundreds of complaints about dangerous driving, excessive noise, littering and people and vehicles obstructing highways and residential or business properties.

“The previous Black Country-wide injunction proved incredibly effective in reducing instances of street racing across the region but, since it lapsed in 2021, the problem has started to grow once more.

“We are pleased that we will shortly be in a position to issue proceedings to seek a new injunction which, if granted, will once again give councils and the police the powers they need to crack down on street racing as and when it occurs.

“This is a very important piece of work, and we are working closely with our council and police colleagues across the Black Country to ensure the case for a new injunction that we will put to the High Court is as robust as it can possibly be.”

People are invited to submit comments and observations regarding street racing and the application for a new injunction by emailing litigation@wolverhampton.gov.uk. Comments received may be presented as evidence to the High Court.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

Full details of the application will be published at www.wolverhampton.gov.uk/street-racing-injunction in due course.

ENDS

Notes to editors:

1/ For more information or to arrange an interview, please contact Paul Brown, Communications Manager, on 01902 555497 or email paul.brown@wolverhampton.gov.uk.

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Wolverhampton Today
Published by Orlo · 25 August at 13:01 · ...

The four Black Country local authorities and West Midlands Police are in the process of applying for a new High Court injunction to ban street racing, also known as car cruising, in the Black Country.

The final touches are currently being put to paperwork and will be filed with the High Court in the next few weeks, with a hearing date likely this autumn.

The proposed injunction would forbid people from participating in, attending, promoting, organising or publicising a stre... See more

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Ash Best
Shouldn't any motorist who speeds and drives dangerously be caught and punished not just those in modified cars? Meeting up with friends in cars isn't illegal but dangerous driving is. I know for a fact there will be 3 or more cars meeting up and maybe... See more

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Mark R Pile
Back in 2003 lol I sort of kind of was heavily in the scene even had my own shop in Brierley hill.

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Sandwell
1 September at 11:46 · ...

Wolverhampton Today
25 August at 13:01 · ...

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The four Black Country local authorities and West Midlands Police are in the process of applying for a new High Court injunction to ban street racing, also know... See more

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Walsall Council Retweeted
Wolves Council @WolvesCouncil · Aug 25

We, @dudleymbc, @sandwellcouncil, @WalsallCouncil & @WMPolice are in the process of applying for a new High Court injunction to ban street racing, also known as car cruising, in the Black Country. Full story: orlo.uk/Kk5Wu #streetracing #carcruising #injunction

2 7

Dudley Council Retweeted
Wolves Council @WolvesCouncil · Aug 25

We, @dudleymbc, @sandwellcouncil, @WalsallCouncil & @WMPolice are in the process of applying for a new High Court injunction to ban street racing, also known as car cruising, in the Black Country. Full story: orlo.uk/Kk5Wu #streetracing #carcruising #injunction

2 7

Councils and police in court to seek new ban on street racing

Released: TBC



The four Black Country councils and West Midlands Police will appear before the High Court on (DATE) to apply for a new injunction to ban "street racing" across the region.

If successful, the injunction will prohibit people from participating in, attending, promoting, organising or publicising a street racing event, also known as car cruising, anywhere within the boroughs of Wolverhampton, Dudley, Sandwell or Walsall.

Anyone ignoring the injunction could be arrested, face penalties such as up to two years' imprisonment or an unlimited fine, or have their assets seized.

For the purposes of the application, street racing is defined as the act of drivers of cars, motorbikes or quadbikes meeting to race or show off in their vehicles.

A similar injunction had previously been in force in the Black Country between 2015 and 2021, and had helped dramatically reduce instances of street racing across the region in that time.

The new application is once again being led by the City of Wolverhampton Council on behalf of the four Black Country councils and West Midlands Police.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing, said: "We are pleased to be returning to the High Court on (DATE) to seek a new injunction against street racing in the Black Country.

“Street racing, also sometimes described as car cruising, is noisy, dangerous and illegal and some events have resulted in serious injuries and even death.

"The previous Black Country-wide injunction proved incredibly effective in reducing instances of street racing across the region. However, the problem still persists in some areas, and has started to grow again since the original injunction expired.

“Since announcing our intention to seek a new injunction, we have been inundated with comments from residents and businesses whose lives are still being blighted by street racing, with evidence of dangerous driving, excessive noise, littering and people and vehicles obstructing highways and properties. These have helped us build what we believe to be an overwhelming case for the injunction.

"It is important that the authorities have the powers they need to crack down on street racing as and when it occurs and so we are naturally hopeful that we can secure this new injunction as soon as possible."

The application will be heard at Birmingham High Court on (DATE). For more information, including details of full terms of the proposed injunction and evidence in support of the application, please visit <http://bit.ly/street-racing-injunction>.

People are invited to submit comments and observations regarding street racing and the application for a new injunction by emailing litigation@wolverhampton.gov.uk.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

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 - www.youtube.com/wolverhamptontoday

DRAFT



Social media to accompany media release announcing High Court hearing date

TWITTER

We, together with @dudleymbc, @sandwellcouncil, @WalsallCouncil & @WMPolice are applying for new High Court injunction to ban "street racing" in the Black Country. Full story: XXXX (1/3)

If successful, the injunction will prohibit people from participating in, attending, promoting, organising or publicising a street racing event (AKA car cruising), anywhere within the boroughs of Wolverhampton, Dudley, Sandwell or Walsall. (2/3)

The application will be heard at Birmingham High Court on (DATE). For more information, including details of full terms of the proposed injunction and evidence in support of the application, please visit www.wolverhampton.gov.uk/street-racing-injunction. (3/3)

FACEBOOK

The four Black Country councils and West Midlands Police are applying for new High Court injunction to ban "street racing" in the region.

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INSTAGRAM

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DRAFT

Councils and police seek street racing an in court next week

Released: TBC



The four Black Country councils and West Midlands Police will appear before the High Court next week to apply for a new injunction to ban "street racing" across the region.

If successful, the injunction will prohibit people from participating in, attending, promoting, organising or publicising a street racing event, also known as car cruising, anywhere within the boroughs of Wolverhampton, Dudley, Sandwell or Walsall.

Anyone ignoring the injunction could be arrested, face penalties such as up to two years' imprisonment or an unlimited fine, or have their assets seized.

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"The previous Black Country-wide injunction proved incredibly effective in reducing instances of street racing across the region. However, the problem still persists in some areas, and has started to grow again since the original injunction expired.

“Since announcing our intention to seek a new injunction, we have been inundated with comments from residents and businesses whose lives are still being blighted by street racing, with evidence of dangerous driving, excessive noise, littering and people and vehicles obstructing highways and properties. These have helped us build what we believe to be an overwhelming case for the injunction.

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DRAFT



Social media to accompany media release a week before High Court hearing

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If successful, the injunction will prohibit people from participating in, attending, promoting, organising or publicising a street racing event (also known as car cruising), anywhere within the boroughs of Wolverhampton, Dudley, Sandwell or Walsall.

Councillor Jasbir Jaspal, Cabinet Member for Public Health and Wellbeing, said: "Street racing, also sometimes described as car cruising, is noisy, dangerous and illegal and some events have resulted in serious injuries and even death.

"A previous Black Country-wide injunction proved incredibly effective in reducing instances of street racing across the region. However, the problem still persists in some areas, and has started to grow again since the original injunction expired and so we are naturally hopeful that we can secure this new injunction as soon as possible."

The application will be heard at Birmingham High Court on (DATE). For more information, including details of full terms of the proposed injunction and evidence in support of the application, please visit www.wolverhampton.gov.uk/street-racing-injunction. Read more here: (LINK TO NEWS STORY)

INSTAGRAM

The four Black Country councils and West Midlands Police will be at the High Court next week to seek an injunction to ban "street racing" in the region.

If successful, the injunction will prohibit people from participating in, attending, promoting, organising or publicising a street racing event (also known as car cruising), anywhere within the boroughs of Wolverhampton, Dudley, Sandwell or Walsall.

The application will be heard at Birmingham High Court on (DATE). For more information, including details of full terms of the proposed injunction and evidence in support of the application, please visit www.wolverhampton.gov.uk/street-racing-injunction. Read more here: (LINK TO NEWS STORY)

DRAFT

Street racing banned in Black Country by High Court

Released: TBC



The High Court has today (DATE) granted an injunction banning “street racing” across the Black Country.

The injunction prohibits people from participating in, attending, promoting, organising or publicising a street racing event, also known as car cruising, anywhere within the boroughs of Wolverhampton, Dudley, Sandwell or Walsall.

Anyone ignoring the injunction could be arrested or face penalties such as up to two years' imprisonment, an unlimited fine or have their assets seized.

For the purposes of the application, street racing is defined as the act of drivers of cars, motorbikes or quadbikes meeting to race or show off in their vehicles. The injunction will come into effect on (DATE) and is valid for a period of three years.

Granting the injunction, which is served against ‘persons unknown’, His Honour XXX, sitting as a High Court Judge, said: “XXXXXXXXXX”

The application was led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council, Walsall Council and West Midlands Police.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing, said: "We are delighted that the High Court has granted this injunction, which will help tackle the menace of street racing in the Black Country.

“A similar injunction was in force between 2015 and 2021 which helped dramatically reduce instances of street racing across the region – and we are very confident this new injunction will have the same positive effect.

“Street racing, also sometimes described as car cruising, is noisy, dangerous and illegal and some events have resulted in serious injuries and even death.

"After announcing our intention to seek a new injunction earlier this summer, we were inundated with comments from residents and businesses whose lives are still being blighted by street racing, with evidence of dangerous driving, excessive noise, littering and people and vehicles obstructing highways and properties.

“These helped us build what the High Court has recognised to be an overwhelming case for this injunction, which will give the authorities the powers they need to crack down on street racing as and when it occurs.”

QUOTE FROM WEST MIDLANDS POLICE

For more information, including details of full terms of the injunction and evidence in support of the application, please visit www.wolverhampton.gov.uk/street-racing-injunction.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

ENDS

Notes to editors:

1/ For more information or to arrange an interview, please contact Paul Brown, Communications Manager, on 01902 555497 or email paul.brown@wolverhampton.gov.uk.

- **Issued by the City of Wolverhampton Council’s Corporate Communications Team.**
- **For more information, please call 01902 555439.**
- **More news from the City of Wolverhampton Council is available at:**
 - www.wolverhampton.gov.uk/news
 - www.twitter.com/wolvescouncil
 - www.facebook.com/wolverhamptontoday
 - www.youtube.com/wolverhamptontoday



Social media to accompany media release upon granting of injunction

Twitter

The High Court has today (DATE) granted an injunction banning “street racing”, also known as car cruising, across the Black Country. Full story: [LINK TO MEDIA RELEASE](#)

It will prohibit people from participating in, attending, promoting, organising or publicising a street racing event (AKA car cruising) anywhere within the @WolvesCouncil, @dudleymbc, @sandwellcouncil, @WalsallCouncil areas. (2/4) @WMPolice

Anyone ignoring the injunction could be arrested or face penalties such as up to two years' imprisonment, an unlimited fine or have their assets seized. It comes into effect on DATE. (3/4)

For more information, including details of full terms of the injunction and evidence in support of the application, please visit www.wolverhampton.gov.uk/street-racing-injunction. (4/4)

FACEBOOK

The High Court has today granted an injunction banning “street racing”, also known as car cruising, across the Black Country.

It will prohibit people from participating in, attending, promoting, organising or publicising a street racing event (also sometimes called car cruising) anywhere within Wolverhampton, Dudley, Sandwell or Walsall.

Anyone ignoring the injunction could be arrested or face penalties such as up to two years' imprisonment, an unlimited fine or have their assets seized. It comes into effect on DATE.

The application was brought by the City of Wolverhampton Council on behalf of the four Black Country councils and West Midlands Police. Councillor Jasbir Jaspal, Cabinet Member for Public Health and Wellbeing, said: "We are delighted that the High Court has granted this injunction, which will help tackle the scourge of street racing in the Black Country.

"We have been inundated with comments from residents and businesses whose lives are being blighted by street racing, and these helped us build an overwhelming case for this injunction which will give the authorities the powers they need to crack down on street racing as and when it occurs."

Please click [LINK TO MEDIA RELEASE](#) to read the full story. For more information, including details of full terms of the injunction and evidence in support of the application, please visit www.wolverhampton.gov.uk/street-racing-injunction.

INSTAGRAM

"Street racing", also known as "car cruising", will be banned across the Black Country after the High Court granted a new injunction.

It will prohibit people from participating in, attending, promoting, organising or publicising a street racing event anywhere within Wolverhampton, Dudley, Sandwell or Walsall. Anyone ignoring the injunction could be arrested or face penalties such as up to two years' imprisonment, an unlimited fine or have their assets seized. It comes into effect on DATE.

Please click [LINK TO MEDIA RELEASE](#) to read the full story. For more information, including details of full terms of the injunction and evidence in support of the application, click www.wolverhampton.gov.uk/street-racing-injunction.

STREET RACING BANNED IN THE BLACK COUNTRY

**Street racing injunction
now in force across
Dudley, Sandwell,
Walsall and
Wolverhampton.**

www.wolverhampton.gov.uk/street-racing-injunction



Walsall Council

CITY OF
WOLVERHAMPTON
COUNCIL
p 112

Street racing, also known as '**car cruising**', is banned across the Black Country by a High Court injunction which came into effect on: XXXXXXXXXXXX

The injunction forbids people from participating in or promoting, organising or publicising a 'street racing' event anywhere within the Black Country. Anyone suspected of breaching it will be at risk of being in contempt of court, for which an adult can face up to two years in prison and a fine.

*Anyone who witnesses a street racing event on the public highway or publicly accessible place is asked to call the **West Midlands Police on 101** or email asbu@wolverhamptonhomes.org.uk. **In an emergency, dial 999.***

INJUNCTION - *The injunction states:*

IT IS FORBIDDEN to participate between the hours of 3pm and 7am in a gathering of two or more persons within the Black Country Area at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

IT IS FORBIDDEN to participate between the hours of 3pm and 7am in a gathering of two or more persons within the Black Country Area with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving.

IT IS FORBIDDEN to promote, organise or publicise (by any means whatsoever) any gathering between the hours of 3pm and 7am of two or more persons with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving within the Black Country Area.

Stunts are driving manoeuvres often undertaken at such gatherings including:

- a) **“Burnouts”**, causing a vehicle to destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed;
- b) **“Donuts/Donutting”**, causing a vehicle to rotate around a fixed point (normally the front axle) while not moving-off causing noise, smoke and tyre marks to be created;
- c) **“Drifting”**, turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input; and
- d) **“Undertaking”**, passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code.

A power of arrest applies to the injunction. The injunction and power of arrest came into effect on XXXXXXXXXXXX and is valid for three years.

*The full injunction and map showing the defined **Black Country Area** is available at www.wolverhampton.gov.uk/street-racing-injunction and at council offices.*

Street racing ban comes into force in Black Country

Released: TBC



“Street racing” has been officially banned in the Black Country after a High Court injunction came into force today (DATE).

The injunction prohibits people from participating in, attending, promoting, organising or publicising a street racing event, also known as car cruising, anywhere within the boroughs of Wolverhampton, Dudley, Sandwell or Walsall.

Anyone ignoring the injunction could be arrested or face penalties such as up to two years' imprisonment, an unlimited fine or have their assets seized.

For the purposes of the application, street racing is defined as the act of drivers of cars, motorbikes or quadbikes meeting to race or show off in their vehicles. It is also sometimes known as car cruising.

The application for the injunction was led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council, Walsall Council and West Midlands Police.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing, said: "We are delighted that this injunction is now in force, and are confident it will have an immediate effect in helping to tackle what is becoming a growing problem in the Black Country.

“A similar injunction was in force between 2015 and 2021, and helped dramatically reduce instances of street racing across the region. Since it expired, more and more cases have been reported to the authorities, and this injunction gives local councils and the police the tools they need to deal with the perpetrators.”

She added: “Street racing, also sometimes described as car cruising, is noisy,

dangerous and illegal and some events have resulted in serious injuries and even death.

“The injunction makes it very clear that anyone participating in a street race, whether as a participant, spectator, organiser or promoter, will be in contempt of court and will face very severe penalties.”

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

For more information about the injunction, which is in place for XXX years, please visit www.wolverhampton.gov.uk/street-racing-injunction

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

ENDS

Notes to editors:

1/ For more information or to arrange an interview, please contact Paul Brown, Communications Manager, on 01902 555497 or email paul.brown@wolverhampton.gov.uk.

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 - www.facebook.com/wolverhamptontoday
 - www.youtube.com/wolverhamptontoday



Social media to accompany media release issued at time injunction comes into force

"Street racing", also sometimes called "car cruising" is now officially banned in the Black Country after a High Court injunction came into force today (DATE). Full story: [LINK TO MEDIA RELEASE](#) (1/4)

The injunction, secured with support from @WMPolice, prohibits people from participating in, attending, promoting, organising or publicising a street racing event anywhere within the @WolvesCouncil, @dudleymbc, @sandwellcouncil, @WalsallCouncil areas. (2/4)

Anyone ignoring the injunction could be arrested or face penalties such as up to two years' imprisonment, an unlimited fine or have their assets seized. (3/4)

For more information about the injunction, which is in place for XXX years, please visit www.wolverhampton.gov.uk/street-racing-injunction. (4/4)

FACEBOOK

"Street racing", also known as car cruising, is now officially banned in the Black Country after a High Court injunction came into force today (DATE).

The injunction prohibits people from participating in, attending, promoting, organising or publicising a street racing event anywhere within Wolverhampton, Dudley, Sandwell or Walsall.

Anyone ignoring the injunction could be arrested or face penalties such as up to two years' imprisonment, an unlimited fine or have their assets seized.

The application was brought by the City of Wolverhampton Council on behalf of the four Black Country councils and West Midlands Police. Councillor Jasbir Jaspal, Cabinet Member for Public Health and Wellbeing, said: "We are delighted that this injunction is now in force, and are confident it will have an immediate effect in helping to tackle what is becoming a growing problem in the Black Country.

"Street racing is noisy, dangerous and illegal and some events have resulted in serious injuries and even death. The injunction makes it very clear that anyone participating in a street race, whether as a participant, spectator, organiser or promoter, will be in contempt of court and will face very severe penalties."

Please click [LINK TO MEDIA RELEASE](#) to read the full story. For more information about the injunction, which is in place for XXX years, please visit www.wolverhampton.gov.uk/street-racing-injunction.

INSTAGRAM

"Street racing", also known as "car cruising", is now officially banned across the Black Country after a new High Court injunction came into force today (DATE).

It prohibits people from participating in, attending, promoting, organising or publicising a street racing event anywhere within Wolverhampton, Dudley, Sandwell or Walsall. Anyone ignoring the injunction could be arrested or face penalties such as up to two years' imprisonment, an unlimited fine or have their assets seized.

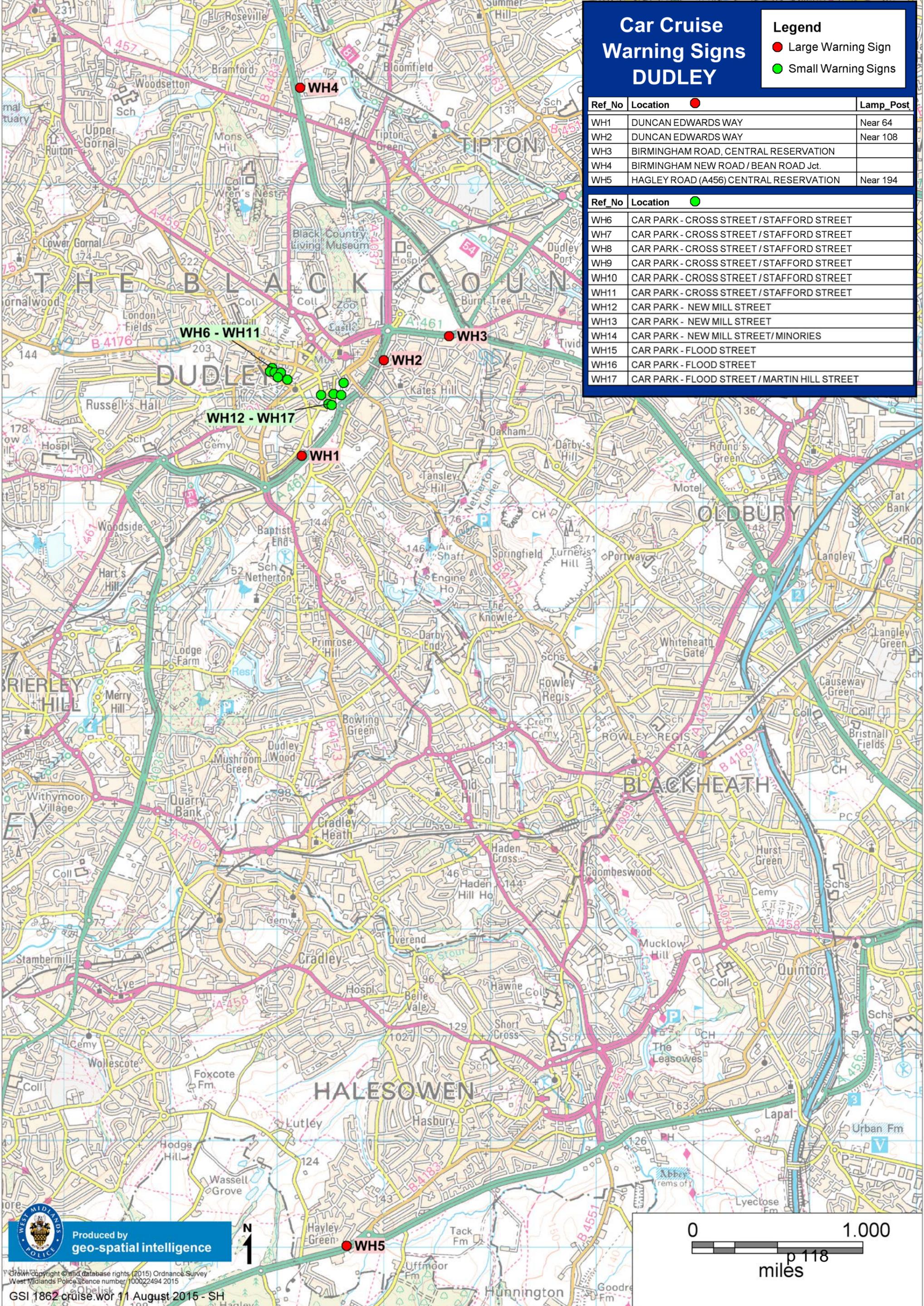
Please click [LINK TO MEDIA RELEASE](#) to read the full story. For more information about the injunction, which is in place for XXX years, please visit www.wolverhampton.gov.uk/street-racing-injunction

Car Cruise Warning Signs DUDLEY

- Legend**
- Large Warning Sign
 - Small Warning Signs

Ref_No	Location	Lamp_Post
WH1	DUNCAN EDWARDS WAY	Near 64
WH2	DUNCAN EDWARDS WAY	Near 108
WH3	BIRMINGHAM ROAD, CENTRAL RESERVATION	
WH4	BIRMINGHAM NEW ROAD / BEAN ROAD Jct.	
WH5	HAGLEY ROAD (A456) CENTRAL RESERVATION	Near 194

Ref_No	Location
WH6	CAR PARK - CROSS STREET / STAFFORD STREET
WH7	CAR PARK - CROSS STREET / STAFFORD STREET
WH8	CAR PARK - CROSS STREET / STAFFORD STREET
WH9	CAR PARK - CROSS STREET / STAFFORD STREET
WH10	CAR PARK - CROSS STREET / STAFFORD STREET
WH11	CAR PARK - CROSS STREET / STAFFORD STREET
WH12	CAR PARK - NEW MILL STREET
WH13	CAR PARK - NEW MILL STREET
WH14	CAR PARK - NEW MILL STREET / MINORIES
WH15	CAR PARK - FLOOD STREET
WH16	CAR PARK - FLOOD STREET
WH17	CAR PARK - FLOOD STREET / MARTIN HILL STREET



**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

**SCHEDULE OF LOCATIONS OF ROAD SIGNS IN THE LOCAL GOVERNMENT AREA OF
WOLVERHAMPTON CITY COUNCIL PUBLICISING A HIGH COURT INJUNCTION
PROHIBITING CAR CRUISING/STREET RACING**

EXISTING SIGNAGE (INSTALLED BETWEEN JANUARY 2015 and JANUARY 2021)

No	Location of Sign	Material of Sign (Metal or Foamex)
1.	Duncan Edwards Way (Lamppost 64)	Metal
2.	Duncan Edwards Way (Lamppost 108)	Metal
3.	Birmingham New Road Central Reservation (point WH3 on map "Car Cruise Warning Signs, Dudley")	Metal
4.	Birmingham New Road/Bean Road Junction (point WH4 on map "Car Cruise Warning Signs, Dudley")	Metal
5.	Hagley Road, A456 Junction Central Reservation (near 194) (point WH5 on map "Car Cruise Warning Signs, Dudley")	Metal
6.	Car Park Cross Street/Stafford Street (6 no.) (Points WH6 – WH11 on map "Car Cruise Warning Signs, Dudley")	Foamex
7.	Car Park New Mill Street/Minories (3 no.) (Points WH12 – WH14 on map "Car Cruise Warning Signs, Dudley")	Foamex

8.	Flood Street Car Park (3 no.) (Points WH15 – WH17 on map “Car Cruise Warning Signs, Dudley”)	Foamex
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**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(5) WOLVERHAMPTON CITY COUNCIL
(6) DUDLEY METROPOLITAN BOROUGH COUNCIL
(7) SANDWELL METROPOLITAN BOROUGH COUNCIL
(8) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

**SCHEDULE OF LOCATIONS OF ROAD SIGNS IN THE LOCAL GOVERNMENT AREA OF
WOLVERHAMPTON CITY COUNCIL PUBLICISING A HIGH COURT INJUNCTION
PROHIBITING CAR CRUISING/STREET RACING**

**PROPOSED SIGNAGE (TO BE INSTALLED IF APPLICATION FOR INJUNCTION AUTUMN
2022 IS SUCCESSFUL AND THE HONOURABLE COURT GRANTS AN INJUNCTION)**

No	Location of Sign	Material of Sign (Metal or Foamex)
1.	Hagley Road (2 no.)	Metal Signs
2.	Waterfront (4 no.) signs at entrances to Waterfront	Metal Signs
3.	Merry Hill Retail Centre (30 no.)	Foamex Signs around centre

4.	Black Country Route between Roundabout with exit for Armstrong Way Keyway Retail Park and Premier Inn, Walsall (both directions) 15 no. signs at regular intervals in each direction (30 no. signs in total) and metal signs at end point of parallel lines in each direction (2 no. metal signs) (Marked as area between two bold red parallel lines on map "Proposed Signage (Wolverhampton) (Map 2 of 3)	30 Foamex Signs 2 Metal Signs
5.	Black Country Route between Premier Inn, Walsall, M6 Junction 10 and Roundabout at Junction 10 of the M6 by Boundary Outlet, Walsall at regular intervals in both directions (15 no. foam signs in each direction, 30 no. foam signs in total) and metal signs at end point of parallel lines in each direction (2 no. metal signs). (Marked as area between two bold red parallel lines on map "Proposed Signage (Wolverhampton) (Map 3 of 3)	2 metal signs 30 Foamex signs

- i) Statement of: Simon Ackroyd
- ii) Statement No: 1
- iii) For: Claimant
- iv) Dated:
- v) Exhibits:

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO: A90BM228

B E T W E E N:

- (1) WOLVERHAMPTON CITY COUNCIL**
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL**
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL**
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

WITNESS STATEMENT OF PC SIMON ACKROYD

I, Police Constable 4430 Simon David Ackroyd of the West Midlands Police, WILL SAY AS FOLLOWS:

1. I am a police constable with the West Midlands Police based at Wednesbury Police Station.
2. On 21 November 2018, I conducted a check on all the signage relating to the Black Country Car Cruising Injunction in the Sandwell local authority area. I now exhibit (Exhibit SA1) the signed checklist.

STATEMENT OF TRUTH

I believe that the facts stated in this Witness Statement are true.

Full Name: PC Simon Ackroyd

Name of Claimant: Sandwell Metropolitan Borough Council

Signed

Print Name

Dated

S. Ackroyd
Simon Ackroyd
03/01/19

CAR CRUISING LARGE AND FOAMEX WARNING SIGN LOCATIONS

SANDWELL MBC

DATE SIGN CHECK COMPLETED: 21/11/2018

S. Dyer

WEDNESBURY

- ✓ 1. RETAIL PARK ENTRANCE OF AXLETREE WAY (JUNC 9 TOWARDS WEDNESBURY) LARGE SIGN. IN ORDER ~~Y~~.
- REPLACED 21/11/18 ✓ 2. AXLETREE WAY ISLAND (IKEA SIDE). LAMPOST 12 FOAMEX SIGN. IN ORDER ~~Y~~ (N). BROKE IN HALF DROPPED DOWN
- ✓ 3. AXLETREE WAY JUNCTION NEAR TO CURRYS. LAMPOST 1. FOAMEX SIGN. IN ORDER ~~Y~~.
- ✓ 4. AXLETREE WAY ISLAND (PC WORLD/CURRYS/BURGER KING) LAMPOST 34. FOAMEX SIGN. IN ORDER ~~Y~~.
- ✓ 5. MOORCROFT DRIVE (JUNCTION OF HALLENS DRIVE) LAMPOST 1. FOAMEX SIGN. IN ORDER ~~Y~~.
- ✓ 6. HALLENS DRIVE (ISLAND JUNCTION OF PATENT DRIVE). LAMPOST 13 FOAMEX SIGN. IN ORDER ~~Y~~.
- ✓ 7. HALLENS DRIVE (ISLAND JUNCTION NEAREST CANAL NEAR JOHNSON CONTROLS END). LAMPOST 19 FOAMEX SIGN. IN ORDER ~~Y~~.
- ✓ 8. A41 (BLACKCOUNTRY ROUTE NEAR TO DREAMS) LARGE SIGN. IN ORDER ~~Y~~.

TIPTON

- ✓ 9. A41 ISLAND GREAT BRIDGE (BY OLYMPUS). LAMPOST R 3/5. IN ORDER ~~Y~~.
- ✓ 10. BRICKHOUSE LANE SOUTH (BY PETROL STATION) LAMPOST 7. FOAMEX SIGN. IN ORDER ~~Y~~.
- ✓ 11. ENTRANCE TO MCDONALDS CARPARK AREA. NO LAMPOST NUMBER. FOAMEX SIGN. IN ORDER ~~Y~~.
- ✓ 12. ENTRANCE TO ASDA RETAIL OFF GREAT BRIDGE STREET. FOAMEX SIGN. IN ORDER ~~Y~~ (N) VISIBLE BUT BROKEN IN HALF. NEEDS REPLACING.

REPLACED 21/12/18

S. Dyer

- ✓ 13. DUDLEY PORT JUNCTION OF SEDGLEY ROAD EAST PRIOR TO THE TRAFFIC LIGHTS HEADING TOWARDS GREAT BRIDGE. PAMPOST 34. FOAMEX SIGN. IN ORDER ~~Y/18~~.

WEST BROMWICH

- ✓ 14. GREEN STREET (JUNCTION OF KENRICK WAY TOWARDS WEST BROMWICH) LAMPOST 12 FOAMEX SIGN. IN ORDER ~~Y/18~~.
- ✓ 15. KENRICK WAY TOWARDS WEST BROMWICH (JUST PAST CRICKETERS ARMS) LAMPOST 55. FOAMEX SIGN. IN ORDER ~~Y/18~~.
- ✓ 16. KENRICK WAY AWAY FROM WEST BROMWICH. FOAMEX SIGN. IN ORDER ~~Y/18~~.
- ✓ 17. BLACKLAKE JUNCTION OF NEW SWAN LANE TOWARDS WEDNESBURY. FOAMEX SIGN. IN ORDER ~~Y/18~~.

OLDBURY

- ✓ 18. TOYS R US CAR PARK JUST AFTER ENTRANCE. FOAMEX SIGN. IN ORDER ~~Y/18~~.
- ✓ 19. TOYS R US CENTRE OF CARPARK. FOAMEX SIGN. IN ORDER ~~Y/18~~.
- ✓ 20. EXIT TOYS R US CARPARK AT JUNCTION OF WOLVERHAMPTON ROAD. LAMPOST 207. FOAMEX SIGN. IN ORDER ~~Y/18~~.
- ✓ 21. AS YOU EXIT JUNCTION 2 (M5) AND ENTER BIRCHLEY ISLAND. LARGE SIGN. IN ORDER ~~Y/18~~.

S. Dyed 21/12/18.

All signs in good condition and visible.

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

- (1) WOLVERHAMPTON CITY COUNCIL**
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL**
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL**
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

**SCHEDULE OF LOCATIONS OF ROAD SIGNS IN THE LOCAL GOVERNMENT AREA OF
SANDWELL METROPOLITAN BOROUGH COUNCIL PUBLICISING A HIGH COURT
INJUNCTION PROHIBITING CAR CRUISING/STREET RACING**

EXISTING SIGNAGE (INSTALLED BETWEEN JANUARY 2015 and JANUARY 2021)

No	Location of Sign	Material of Sign (Metal or Foamex)
1.	Retail Park Entrance of Axeltree Way, Wednesbury	Foamex
2.	Retail Park Entrance of Axeltree Way, Wednesbury	Metal
3.	Axeltree Way Island (near Curry's), Wednesbury (Lamppost 1)	Foamex
4.	Axeltree Way Island (near IKEA), Wednesbury (Lamppost 12)	Foamex
5.	Axeltree Way Island, Wednesbury (PC World, Burger King Side) (Lamppost 34)	Foamex
6.	Moorcroft Drive, (Junction of Hallens Drive) Wednesbury (Lamppost 1)	Foamex
7.	Hallens Drive/Patent Drive Island Junction, Wednesbury (Lamppost 13)	Foamex
8.	Hallens Drive Wednesbury (Lamppost 19)	Foamex
9.	A41 Black Country Route (near Dreams)	Metal

10.	A41 Island Great Bridge (by Olympus) Lamppost R 3/5	Foamex
11.	Brickhouse Lane South (by Petrol Station) – Lamppost 7	Foamex
12.	Green Street, West Bromwich (Lamppost 12)	Foamex
13.	Kenrick Way West Bromwich (Lamppost 55)	Foamex
14.	Toys 'R' Us Car Park (off Junction 2 of the M5) Oldbury (Car Park Entrance)	Foamex
15.	Toys 'R' Us Car Park (off Junction 2 of the M5) Oldbury (Centre of Car Park)	Foamex
16.	Toys 'R' Us Car Park (off Junction 2 of the M5) Oldbury (Junction with Wolverhampton Road)	Foamex
17.	Wolverhampton Road, Oldbury (Lamppost 27)	Foamex
18.	ASDA Retail Entrance Off Great Bridge Street, Tipton	Foamex
19.	McDonald's Car Park Entrance, Great Bridge, Tipton	Foamex
20.	Dudley Port Junction of Sedgley Road East before traffic lights heading to Great Bridge (Lamppost 34)	Foamex
21.	Kendrick Way/Green Street Junction towards West Bromwich (Lamppost 12)	Foamex
22.	Kendrick Way towards West Bromwich (near Cricketer's Arms public house) (Lamppost 55)	Foamex
23.	Kendrick Way away from West Bromwich	Foamex
24.	Black Lake/New Swan Lane Junction in the direction of Wednesbury	Foamex
25.	Exit Junction 2 of the M5 (Oldbury) towards Birchley Island (Left-hand side of carriageway)	Metal
26.	Kendrick Way, West Bromwich near Glover Street in the Direction of Green Street	Metal
27.	Black Country New Road Between Hallens Drive Roundabout and Patent Drive Roundabout (Wednesbury)	Metal
28.	A461 Exit of Junction 9 of the M6 towards Wednesbury	Metal

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

(5) WOLVERHAMPTON CITY COUNCIL
(6) DUDLEY METROPOLITAN BOROUGH COUNCIL
(7) SANDWELL METROPOLITAN BOROUGH COUNCIL
(8) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

PERSONS UNKNOWN

Respondents

SCHEDULE OF LOCATIONS OF ROAD SIGNS IN THE LOCAL GOVERNMENT AREA OF
WOLVERHAMPTON CITY COUNCIL PUBLICISING A HIGH COURT INJUNCTION
PROHIBITING CAR CRUISING/STREET RACING

PROPOSED SIGNAGE (TO BE INSTALLED IF APPLICATION FOR INJUNCTION AUTUMN
2022 IS SUCCESSFUL AND THE HONOURABLE COURT GRANTS AN INJUNCTION)

There are no plans to install further signage in the Borough of Sandwell at the time of writing (September 2022) should the honourable Court be minded to grant an injunction.

1.	Black Country Route between Roundabout with exit for Armstrong Way Keyway Retail Park and Premier Inn, Walsall (both directions) 15 no. signs at regular intervals in each direction (30 no. signs in total) and metal signs at end point of parallel lines in each direction (2 no. metal signs) (Marked as area between two bold red parallel lines on map "Proposed Signage (Wolverhampton) (Map 2 of 3)	30 Foamex Signs 2 Metal Signs
2.	Black Country Route between Premier Inn, Walsall, M6 Junction 10 and Roundabout at Junction 10 of the M6 by Boundary Outlet, Walsall at regular intervals in both directions (15 no. foam signs in each direction, 30 no. foam signs in total) and metal signs at end point of parallel lines in each direction (2 no. metal signs). (Marked as area between two bold red parallel lines on map "Proposed Signage (Wolverhampton) (Map 3 of 3)	2 metal signs 30 Foamex signs

I have information for Wolverhampton and Walsall, please see below;

I have highlighted some signs blue. These are not currently able to display picture messages but are able to display free text messages.

I hope that is helpful.

Wolverhampton Car Park Guidance and Traffic Information	CPG0 1	Waterloo Road - Inbound / Nr Whitmore Hill - Wolverhampton	VMS - Freetex t RGB
	CPG0 2	Ring Road St Peters / From Stafford St to Waterloo Rd - Wolverhampton	VMS - Freetex t RGB
	CPG0 3	Ring Rd St Andrews / From Waterloo Rd to Chapel Ash - Wolverhampton	VMS - Freetex t RGB
	CPG0 4	Chapel Ash Inbound / Nr to Chapel Ash Island - Wolverhampton	VMS - Freetex t RGB
	CPG0 5	Ring Rd St Marks / From Penn Island to Chapel Ash - Wolverhampton	VMS - Freetex t RGB
	CPG0 6	Ring Rd St Andrews / Nr to Bath Road - Wolverhampton	VMS - Freetex t RGB
	CPG0 7	Ring Road St Johns / Penn Road Island - Wolverhampton	VMS - Freetex t RGB
	CPG0 8	Stafford Road Inbound / Between Cannock Rd and Ring Rd - Wolverhampton	VMS - Freetex t RGB
	CPG0 9	Penn Road Inbound / Nr Mercedes Benz - Wolverhampton	VMS - Freetex t RGB
	CPG1 0	Dudley Rd I/B Nr Bell Place	VMS - Freetex t RGB
	CPG1 1	Ring Rd / St Georges	VMS - Freetex t RGB
	CPG1 2	Ring Rd / St Marks	VMS - Freetex t RGB
	CPG1 3	Ring Rd - St Johns to Snowhill Jct	VMS - Freetex t RGB
	CPG1 4	Ring Rd - St Patricks to Stafford St Jct	VMS - Freetex t RGB

	CPG1 5	Ring Rd - Stafford St to Broad St	VMS - Freetex t RGB
	CPG1 6	Ring Rd - Broad St to Bilston St Island	VMS - Freetex t RGB
	CPG1 7	Ring Rd - Bilston St Island to Broad St	VMS - Freetex t RGB
	CPG1 8	Ring Rd - Snowhill Jct to Bilston St Island	VMS - Freetex t RGB
Walsall Traffic Information Signs	WA01	Wolverhampton Road / Primley Avenue	VMS - Freetex t RGB
	WA02	Bescot Road / Bescot Drive	VMS - Freetex t RGB
	WA03	Lichfield Road / Cartbridge Lane	VMS - 4x15 Freetex t
	WA04	Birmingham Road / Nr Charlemont Road	VMS - Freetex t RGB
	WA05	Darlaston Road / Nr Cemetery Road	VMS - 4x15 Freetex t
	WA06	Green Lane /Nr Beatrice Street	VMS - 4x15 Freetex t
	WA07	Pleck Rd / Wolve Rd - Walsall	VMS - Freetex t RGB
	WA08	Bloxwich Lane - Walsall	VMS - Freetex t RGB
	WA09	BCNR / Nr Wiggle - Bilston	VMS - Freetex t RGB
	WA10	BCR / Nr Bilston FC	VMS - Freetex t RGB
	WA11	Willenhall Rd O/B	VMS - Freetex t RGB

	WA12	A4148 - Broadway North	VMS - Freetex t RGB
	WA13	B4151 - Sutton Rd	VMS - Freetex t RGB
	WA14	A4031-Walsall Rd Nr Greenside Way	VMS - Freetex t RGB
	WA15	B4210-Stafford St Nr Proffit St & Hospital St	VMS - Freetex t RGB
Wolverhampton Traffic Information Signs	WO01	Bilston Road / Nr Steelhouse Lane	VMS - Freetex t RGB
	WO02	Wellington Road / Nr Wolverhampton Street	VMS - Freetex t RGB
	WO03	Stafford Road / The Maltings	VMS - 3x15 Freetex t
	WO04	Wednesfield Road / Nr Bowmans Harbour	VMS - Freetex t RGB
	WO05	Oxford Street / Nr Hare Street - Bilston	VMS - Freetex t RGB
	WO06	Horseley Fields / Nr St James Street I/B	VMS - Freetex t RGB
	WO08	Penn Road / Nr Lea Road I/B	VMS - 3x15 Freetex t
	WO09	Birmingham New Road / Nr Shaw Road I/B	VMS - Freetex t RGB
	WO10	Lichfield Road / Nr Lyndale	VMS - Freetex t RGB
	WO11	Wednesfield Road / Nr Lincoln Road I/B	VMS - Freetex t RGB
	WO12	Cannock Road / Old Hampton Road	VMS - Freetex t RGB

WO13	Willenhall Road / Nr Vaughn Road I/B	VMS - Freetex t RGB
WO14	Stafford Road / Nr Farmbrook I/B	VMS - Freetex t RGB
WO15	Compton Road / Compton Village	VMS - 3x15 Freetex t
WO16	Wolverhampton Road East / Nr Dudding Road I/B	VMS - Freetex t RGB
WO17	Bilston Road // Nr Steelhouse Lane O/B	VMS - 3x15 Freetex t
WO18	Black Country Route / Nr The Lunt	VMS - Freetex t RGB
WO19	Penn Road / Nr Lea Road O/B	VMS - Freetex t RGB
WO20	Birmingham Road / Nr Lever Street O/B	VMS - Freetex t RGB
WO21	Stafford Road / Nr Goodyear Island I/B	VMS - Freetex t RGB
WO22	Stafford Street / Nr Nursery Street O/B	VMS - Freetex t RGB
WO23	Wednesfield Road / Nr Lincoln Street I/B	VMS - 3x15 Freetex t
WO24	Wergs Road	VMS - 4x15 Freetex t
WO25	Coseley Road / BCR Link	VMS - Freetex t RGB
WO26	Stourbridge Road. Penn	VMS - 4x15 Freetex t

WO27	Willenhall Road / Lower Horseley Fields O/B	VMS - Freetex t RGB
WO28	Stafford Road / Nr Gorsebrook Road	VMS - 4x15 Freetex t
WO29	Wobaston Road /Nr Patshul Avenue	VMS - 4x15 Freetex t
WO30	Ring Road St Peters (A0141)	VMS - Freetex t RGB
WO32	Ring Road St Andrews (A0141)	VMS - 4x15 Freetex t
WO33	Ring Road St Davids (A0117)	VMS - 4x15 Freetex t
WO34	BNR / Nr BCR	VMS - Freetex t RGB
WO35	Dudley st / Nr the Splitter	VMS - Freetex t RGB
WO36	Stafford Rd / Nr Oxley moor	VMS - Freetex t RGB

<p>Research</p>	<ol style="list-style-type: none"> 1. Areas throughout the Black Country have witnessed the regular congregation of ‘street racers’ over many years. Street racing is also known as car cruising. 2. The issue is a bone of contention with local residents and businesses with complaints received about dangerous driving, driving at speed, excessive noise from revving engines and music systems, littering, verbal abuse, swearing and intimidation. 3. Street racing – the act of drivers meeting on the public highways on an organised or impromptu basis to race and/or show off their cars - is noisy, dangerous and illegal, obstructing highways and the premises bordering them, damaging property and putting spectators (adults and children) or other road users at risk of injury or worse; there have been a number of road traffic collisions because of street racing. 4. This activity cuts across the four Black Country boroughs of Sandwell, Dudley, Walsall and Wolverhampton, with up to 250 vehicles at each gathering and crowds of spectators along the route. 5. The Community Safety Partnerships of Sandwell, Dudley, Walsall and Wolverhampton together with the West Midlands Police and other agencies are responsible for formulating and implementing a strategy for the reduction of crime and disorder in their respective areas pursuant to Sections 5 and 6 of the Crime and Disorder Act 1998. 6. A huge amount of police resource has been dedicated to address this issue. Enforcement action, including prosecution against vehicles in dangerous condition, no insurance etc, has not contributed to any long term reduction of anti-social vehicles. 7. In response to evidence of possible displacement of the problem across the Black Country because of police operations, and to maximise the impact of measures against street racing, a group approach was taken to seek an injunction to prevent groups meeting anywhere in the Black Country. 8. Served against persons unknown, this was introduced in 2015 and, over its six-year lifespan, had a demonstrable effect in reducing instances of street racing and, in some areas, eliminating it altogether. 9. Following its lapsing in 2021, the issue has begun to arise once more, and therefore the partners are returning to the High Court to seek new injunctive relief.
<p>Objectives</p>	<ol style="list-style-type: none"> 1. Raise awareness of the application for an injunction preventing street racing activities anywhere in the Black

PROTECT

- Country among people intending to organise, take part in or spectate at a planned gathering.
2. Upon granting of the injunction, raise awareness of existence and application of the injunction preventing street racing activities anywhere in the Black Country among people intending to organise, take part in or spectate at a planned gathering.
 3. Enable the injunction to be served to “persons unknown” by ensuring authorities have done all they can to make people aware of its existence.
 4. Reassure residents and businesses that measures are in place to prevent street racing throughout the Black Country.
 5. Improve engagement between partner agencies on the issue of street racing.
 6. Signpost residents and businesses to the mechanisms available in which to report instances of street racing.
 7. Help bring about a reduction in instances of street racing in the Black Country.

Strategy

1. Develop, with partner authorities across the Black Country including Dudley Council, Sandwell Council, Walsall Council and West Midlands Police, a planned and sustained communications campaign which maximises opportunities and manages risks.
2. Using a variety of traditional and social media, raise awareness of the existence of the injunction, and its ramifications for people intending to take part in or spectate at a street racing meeting.
3. Development of a range of materials to highlight injunction and power of arrest.
4. Improve relationship between partners through proactive stakeholder engagement.

Key stakeholders – internal: Council officers – legal, enforcement, Anti-Social Behaviour unit, highways, Cabinet lead, wider Cabinet, local ward councillors, wider council employees.

Key stakeholders – partners: City of Wolverhampton Council, Dudley Council, Sandwell Council, Walsall Council, West Midlands Police, Highways Agency.

Key stakeholders – external: Street race organisers, participants and spectators, local residents, local schools, local businesses, taxpayers, media (Express & Star, Wolverhampton Chronicle, Birmingham Mail, BBC WM, WCR FM, Signal 107, Free Radio, BBC Midlands Today, ITV Central), social media (Twitter, Facebook and Instagram), local MPs.

Implementation

1) Corporate spokespeople:

- Cabinet lead and media spokespeople: Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing; Councillor Obaida Ahmed, the City of Wolverhampton Council's Cabinet Member for Resources and Digital City (Note, partner councils will have their own Cabinet Members who will front this in their locations).
- Council SEB lead: John Denley, Director of Public Health (Note, partner councils will have their own officers who will lead on their behalf).
- Internal/external communications lead: Paul Brown (City of Wolverhampton Council), Chris Horst chris_horst@sandwell.gov.uk (Sandwell Council), Melinder Kaur melinder.kaur@walsall.gov.uk (Walsall) press.office@dudley.gov.uk, corporate_communications@westmidlands.police.uk.

2) Key messages:

- The regular congregation of 'street racers' in the Black Country has been a bone of contention with local residents, local businesses and employees, particularly over many years.
- Street racers – drivers who meet on public highways including the Black Country Route and Black Country New Road and race or show off their cars – pose a great danger. The activities are noisy, dangerous and illegal, obstructing highways and the premises bordering them, damaging property and putting spectators, including children as young as seven, or other road users at risk of injury or worse. It's only a matter of time until someone is killed or seriously injured.
- As many as 250 vehicles at a time meet for these gatherings, usually on Sunday nights, together with crowds of spectators who line the route.
- Complaints have been received by local councils and police about dangerous driving and driving at excessive speeds, excessive noise from revving engines, horns and music systems, verbal abuse and swearing, drug use and intimidation. This is clearly affecting the quality of life of people who have to put up with the problem.
- A huge amount of police resource has been dedicated in an attempt to address this issue – particularly at weekends when demand on police time is already very high – and it is clear that targeting the issue on a location-by-location basis would only going to displace the problem to another areas, and so the four Black Country

boroughs – Wolverhampton, Dudley, Sandwell and Walsall councils – have teamed up with West Midlands Police to tackle the issue on a Black Country-wide basis.

- An injunction was served by the High Court which prohibited groups meeting for street races anywhere within the Black Country. In effect between 2015 and 2021, it had a demonstrable effect in reducing instances of street racing and, in some areas, eliminating it altogether.
- Following its lapsing in 2021, the issue has begun to arise once more, and therefore the partners are returning to the High Court to seek new injunctive relief.
- The injunction will be served against “persons unknown”, and so an individual or individuals suspected of breaching the injunction don’t have to be served personally with it.
- The Black Country councils and West Midlands Police will actively promote the existence of this injunction in a wide variety of ways to ensure, as far as possible, people involved in street racing – either as an organiser, participant, or spectator – aware that the activity is prohibited throughout Dudley, Sandwell, Walsall and Wolverhampton.
- Anyone suspected of breaching the injunction will be in contempt of court, for which an adult can face up to two years in prison and/or a fine. In addition, police will retain their powers in relation to traffic offences including driving without insurance, driving an unroadworthy vehicle and driving without due care and attention.
- Street racing is also sometimes known as car cruising, and both terms will be used within much of the communications, with street racing being the primary description of this activity.

3) Action Plan

- See Action Plan, below – note, this is in two parts, the first relating to the steps that will be taken to publicise the application for an injunction to the High Court, the second the steps that will be taken to publicise the existence and application of the injunction once granted and then implemented. Specific details of the actions required to complete each of the proposed action steps below are set out in the appendices accompanying the action plan. This action plan should therefore be read in conjunction with the appendices.
- To be reviewed after six months.

4) Budget

- Has been identified.

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Evaluation	<ol style="list-style-type: none"> 1. Number of positive stories about street racing injunction both prior to and post implementation in local media – target of at least eight across range of media. 2. Social media reach and engagement levels on postings relating to street racing (comments, likes, shares) 3. Reports of instances of street racing from individuals and businesses 4. Plan delivered on timescale and to budget.
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ACTION PLAN

APPLICATION FOR INJUNCTION MADE TO COURT				
Step	Action	When	Who	Completed
1	Media release announcing intention to apply to the High Court for a new street racing injunction, and asking people to submit details of street racing incidents in their area which could be included as evidence. Please see Appendix 1 , the media release which was issued on 4 July 2022. Please also see note 1) below, detailing distribution of the media release. See also resulting covering in the Express & Star newspaper: https://www.expressandstar.com/news/crime/2022/07/04/new-ban-sought-on-street-racing-in-black-country/ and Birmingham Mail: https://www.birminghammail.co.uk/black-country/street-racing-ban-sought-black-24394456	4/7/22	PB	Yes
2	Social media linking to above media release announcing intention to apply to the High Court for a new street racing injunction. Please see Appendix 2 , examples of social media issued by the City of Wolverhampton Council, Dudley Council, Sandwell Council, Walsall Council and West Midlands Police.	4/7/22	All	Yes
3	Media release reporting large number of responses to appeal for people to submit details of street racing incidents in their area which could be included as evidence. Please see Appendix 3 , the media release which was issued on 25 July 2022. Please also see note 1) below, detailing distribution of the media release. See also resulting covering in the Express & Star newspaper: https://www.expressandstar.com/news/local-hubs/wolverhampton/2022/07/25/anti-social-noisy-and-dangerous-black-country-councils-seeking-street-racing-ban/ and Birmingham Mail: https://www.birminghammail.co.uk/black-country/street-racers-wreak-havoc-black-24579644	25/7/22	PB	Yes
4	Social media linking to above media release reporting large number of responses.	25/7/22	All	Yes

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	Please see Appendix 4 , examples of social media issued by the City of Wolverhampton Council, Dudley Council, Sandwell Council and Walsall Council.			
5	Media release reminding public of intention to apply for new injunction. Please see Appendix 5 , the media release which was issued on 25 August, 2022. Please also see note 1) below, detailing distribution of the media release. See also resulting covering in the Express & Star newspaper: https://www.expressandstar.com/news/local-hubs/wolverhampton/2022/08/25/final-touches-being-put-on-paperwork-to-ban-street-racing-in-the-black-country/ and Birmingham Mail: https://www.birminghammail.co.uk/black-country/new-street-racing-ban-sought-24852070	25/8/22	PB	Yes
6	Social media linking to above media release reporting intention to apply for new injunction. Please see Appendix 6 , examples of social media issued by the City of Wolverhampton Council, Dudley Council, Sandwell Council and Walsall Council.	25/8/22	All	Yes
7	Refresh of the existing street racing pages on the websites for the four councils to announce intention to make a fresh application. Please see updated webpages: https://www.wolverhampton.gov.uk/street-racing-injunction . https://www.dudley.gov.uk/residents/parking-and-roads/roads-highways-and-pavements/car-cruising-injunction/ https://www.sandwell.gov.uk/info/200284/roads_travel_and_parking/3231/street_racing https://go.walsall.gov.uk/black_country_car_cruising_injunction	31/8/22	All	Yes
8	Publication of details of application to the High Court on the websites of the four councils and West Midlands Police, detailing the date of the hearing and the court's address, and associated documents as required.	To go live upon application being made to court	CWC legal/PB	
9	Media release announcing application to High Court for a new street racing injunction, detailing the date of the hearing and the court's address, and asking people to submit details of street racing incidents in their area which could be included as evidence. Please see indicative draft, Appendix 7 , which will be amended as required prior to publication. Please also see note 1) below, detailing proposed distribution of the media release.	Within 2 working days of issue of the above.	PB	
10	Social media linking to above media release announcing application to High Court for a new street racing injunction, detailing the date of the hearing and the court's address. Please see indicative drafts, Appendix 8 , which will be amended as required prior to publication.	Within 1 working day of the above	All	
11	Public notice in Express & Star announcing application to High Court for a new street racing injunction, detailing the date of the hearing and the court's address.	Within 4 working days of the application being made to the	CWC legal	

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		court		
12	Creation of videos of terms of injunction, notice of court hearing and a summary of the case to ensure communications are inclusive and cater for those with literacy difficulties. To be published on claimants' websites and shared widely on social media.	Video to be filmed within 5 working days of the application being made to the court, and published within 10 working days of the application being made to the court	PB	
13	Media release shortly before court hearing, reminding people that an application for a new injunction will shortly be heard by the High Court, detailing the date of the hearing and the court's address. Please see indicative draft, exhibit Appendix 9 , which will be amended as required prior to publication. Please also see note 1) below, detailing proposed distribution of the media release.	One week prior to hearing	PB	
14	Social media linking to above media release announcing imminent court hearing application to High Court for a new street racing injunction, detailing the date of the hearing and the court's address. Please see indicative drafts, Appendix 10 , which will be amended as required prior to publication.	Within 1 working day of the above	All	
INTRODUCTION OF STREET RACING INJUNCTION				
Step	Action		Who	Completed
1	Media release highlighting granting of the High Court injunction and power of arrest and next steps for its introduction. Please see indicative draft, Appendix 11 , which will be amended as required prior to publication. Please also see note 1) below, detailing proposed distribution of the media release.	To be issued by 4pm on the next working day after the date of the grant of any injunction	PB	
2	Social media linking to the above media release regarding the granting of the High Court injunction and power of arrest and next steps for its introduction highlighting introduction of injunction and power of arrest. Please see indicative drafts, Appendix 12 , which will be amended as required prior to publication.	Within 1 working day of the above	All	
3	Update dedicated pages on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council, Walsall Council and West Midlands Police about injunction and power of arrest, and date of introduction of the injunction.	Within three months of the date of the grant of any injunction	All	
4	Review and refresh of existing signage publicising the injunction and installation of new signage as necessary: Dudley's existing signs and proposed signs – see Appendix Signage 1 and 2 ; Sandwell's existing signs and proposed signs – see Appendix Signage 3 and 4 ; Walsall's existing signs and proposed signs – see Appendix Signage 5 and 6 ; Wolverhampton's existing signs and proposed signs – see Appendix Signage 7	Within three months of the date of the grant of any injunction	CWC legal	

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	and 8.			
5	Production of A5 flyer detailing injunction and power of arrest. Please see indicative draft, Appendix 13 , which will be amended as required prior to publication.	Within three months of the date of the grant of any injunction	PB	
6	File statement to court to confirm that the above steps have been completed. Note, this will allow the confirmation of the date that the injunction will come into effect.	Within three months of the date of the grant of any injunction	PB	
7	Place a copy of the injunction and power of arrest in the Express & Star and Chronicle Week newspapers.	Day injunction comes into force. Note, this will be determined by 6, above.	CWC legal	
8	Use of electronic traffic signage on main routes in Wolverhampton, Dudley, Sandwell and Walsall to promote fact that a street racing injunction is in force in the Black Country Area, likely using wording such as "Street Racing is Banned in the Black Country". This message will be displayed on a rolling basis, along with the usual road safety/traffic information which is normally displayed, for the life of the injunction, with particular emphasis on those times when street racing is more likely to occur. Please see Appendix Digital Signage, which lists the electronic signage available in Wolverhampton and Walsall.	From day injunction comes into force and throughout life of injunction.	All	
9	Media release announcing that the new injunction and power of arrest is officially in place. Please see indicative draft, Appendix 14 , which will be amended as required prior to publication. Please also see note 1) below, detailing proposed distribution of the media release.	Day injunction comes into force	PB	
10	Social media linking to above media release announcing that the new injunction and power of arrest is officially in place. Please see indicative drafts, Appendix 15 , which will be amended as required prior to publication.	Within 1 working day of the above.	All	
11	Update to dedicated page on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council, Walsall Council and West Midlands Police to make it clear that injunction is now in force.	Day injunction comes into force	All	
12	Publication of short film highlighting the injunction and power of arrest to be used via all partner channels.	Day injunction comes into force and on further occasions in the following weeks	PB	
13	Development of social media advertising campaign, to run for a period of four weeks and to target the demographic most likely to associate with street racing.	To launch within a week of the injunction coming into effect	PB	
14	Media release highlighting response to introduction of injunction and power of arrest including feedback on any initial impact it has had.	Two weeks after introduction of injunction	PB	
15	Regular social media activity to remind people of existence of injunction and power of arrest.	Throughout life of injunction – frequency to be determined by need/level of incidents of street	PB	

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		racine		
16	Consideration of further advertising, via social media or traditional media as necessary.	As required – to be considered on a monthly basis	PB	
17	Media release highlighting any successful prosecutions as result of injunction	As required	PB	
18	Review of communications plan and refresh	Six months after introduction of injunction	PB	

Notes:

1) Media releases are issued to an extensive distribution list which includes, but is not limited to, local print publications such as the Express and Star, Chronicle Week, the Birmingham Mail, Halesowen & Dudley News and Stourbridge News, local radio stations including BBC WM, Free Radio, Signal 107, WCR FM and Heart, and BBC Midlands Today and ITV Central. Releases are also issued to various hyperlocal community internet sites and national media outlets including PA and Sky News. Media releases are also distributed via other channels available to the claimants – in the case of the City of Wolverhampton Council, these include the website of the City of Wolverhampton Council (www.wolverhampton.gov.uk/news) and other mechanisms including, but not limited to, residents e-Bulletins, councillor bulletins and internal channels.

For: Claimants
Statement of:
Statement no: 1
Exhibits:
Date: January 2023

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO: KB-2022-BHM-000188

BETWEEN:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

-and-

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

Defendants

WITNESS STATEMENT OF TIM PHILPOT

I, TIM PHILPOT of CITY OF WOLVERHAMPTON COUNCIL, CIVIC CENTRE, ST PETERS SQUARE, WOLVERHAMPTON, WV1 1SH, WILL SAY AS FOLLOWS:

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief.
2. This statement is given to update the Court on replacement and additional signs in relation to the Injunction and street racing which have been ordered and installed, or which are planned to be installed within the City of Wolverhampton.
3. Signs have been designed and produced in both metal and Foamex material. A document showing the design of the signs is attached to this statement and marked as TP1.
4. A total of 10 metal signs and 30 Foamex signs have been ordered for installation at various sites within the City. These were received by the appointed installation contractors Stourbridge Paving on 17 January 2023.
5. Of the 10 metal signs, 8 have been ordered to replace existing signage (which is now out of date). These signs were fitted in the following locations on or before 20 January 2023:-
 - Black Country Route near Vulcan Road Roundabout near Bilston Town Football Club (Lamppost 151)
 - Black Country Route Vulcan Road Island near Greenhous Volkswagen Van Centre (Lamppost 152)
 - Black Country Route near to Lunt Road/Vulcan Road Junction (Lamppost 169)
 - Black Country Route westbound near Lunt Junction parallel to Darlaston Brook (Lamppost 200)

- Black Country Route parallel to McDonalds Off Coseley Road Island (freestanding)
- Black Country Route parallel to Nice 1 Limited Off Coseley Road Island Lamppost 062
- Black Country Route Oxford St Roundabout near Brook Street (Lamppost 128)
- Black Country Route eastbound near Overfield Drive (Lamppost 17)

These signs are shown in photographs in the document attached to this statement marked as TP2.

6. In addition to the replacement signs the remaining two signs are intended to be installed in new locations as follows:-

- Black Country Route north side of roundabout junction with Black Country New Road
- Black Country Route on westbound carriageway approaching roundabout junction with Black Country New Road

These locations are shown in photographs in the document attached to this statement marked as TP3.

7. Arrangements are being put in place to install these two additional signs. This work is anticipated to be completed by 10 February 2023

8. Of the 30 Foamex signs seven were deployed by 20 January 2023 to replace existing Foamex signs in Springvale Avenue. The remainder will be placed in new locations on approaches to the Black Country Route. This work is anticipated to be completed by 10 February 2023 These locations are shown in the document attached to this statement marked as TP4.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed

A handwritten signature in black ink, appearing to read 'TP Philpot', enclosed within a rectangular box.

Date

23/01/2023

Print name in full Tim Philpot

Car Cruising & Street Racing Injunction 2022

Witness Statement (Wolverhampton)

Appendix TP1

New Sign Designs



1) at 75 xht
1525 x 1700 mm
area: 2.592 sq.m

Metal Sign



FACING
Background: YELLOW
Border size (mm): 7.5
Border colour: BLACK
TEXT
Style: Transport Heavy
Colour: /black
Lowercase (x-height) (mm): 20
Capital height (mm): 28
DIMENSION
Width (mm): 400
Height (mm): 500
Area (sq.m): 0.2
Tolerance: + 5mm
0

Foamex Sign

Car Cruising & Street Racing Injunction 2022
Witness Statement (Wolverhampton)
Appendix TP2
Replacement of existing metal signs



Location - Black Country Route Oxford Street Roundabout near Brook Street (Lamppost128)



Location - Black Country Route, Vulcan Road Roundabout near Greenhous Volkswagen Van Centre (Lamppost 152)



Location - Black Country Route eastbound near Overfield Drive (Lamppost 17)



Location - Black Country Route parallel to McDonalds Off Coseley Road Island (freestanding)



Location - Black Country Route westbound near Lunt Junction parallel to Darlaston Brook (Lampost 200)



Location - Black Country Route parallel to Nice 1 Limited Off Coseley Road Island Lampost 062



Location - Black Country Route near to Lunt Road/Vulcan Road Junction (Lamppost 169)

No picture available

Location - Black Country Route near Vulcan Road Roundabout near Bilston Town Football Club (Lamppost 151)

**Car Cruising & Street Racing Injunction 2022
Witness Statement (Wolverhampton)
Appendix TP3
Locations for installation of new metal signs**



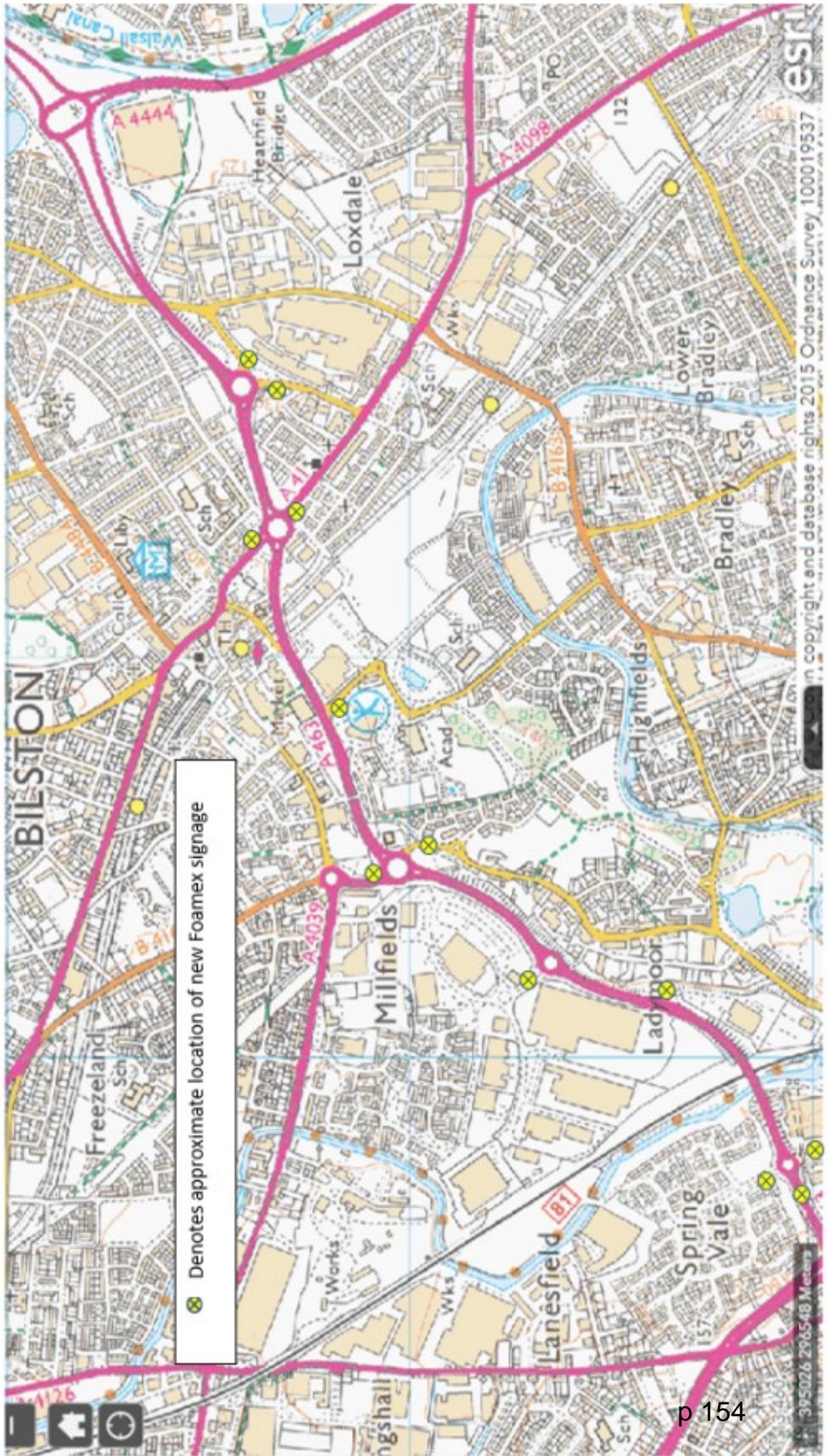
Location - Black Country Route Lunt Junction adjacent to Bickley Pool



Location - Black Country Route, approaching Lunt Junction westbound Lampost 22

Car Cruising & Street Racing Injunction 2022
Witness Statement (Wolverhampton)

Appendix TP4 Locations of new Foamex signs



For: Claimants
Statement of:
Statement no: 1
Exhibits:
Date: 19th January
2023

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO: KB-2022-BHM-000188

BETWEEN:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

-and-

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

Defendants

SECOND WITNESS STATEMENT OF NICK HOOPER

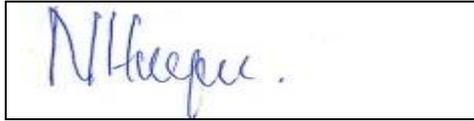
I, NICK HOOPER, Maintenance Manager of Dudley Metropolitan Borough Council, Lister Road Depot, Dudley, DY2 8JW, WILL SAY AS FOLLOWS:

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief.
2. I make this statement supplemental to the witness statement which I signed on 19th January 2023.
3. This statement is given to update the Court on replacement and additional signs in relation to the Injunction and street racing which have been installed since my last statement.
4. The metal signs on Manor Way (A456) were installed on 26th January 2023 as follows (a photograph is exhibited of the new sign in each location as indicated)
 - A456 Manor Way – M5 Junction exit 3 **NH16**
 - A456 Manor Way – East bound approach to Grange Road Roundabout **NH17**
 - A456 Manor Way – West Bound to Grange Road Roundabout **NH18**
5. Foamex signs have also now been installed at Stafford Street car park and Cross Street car park.
6. The remaining 30 Foamex signs have been provided to Merry Hill staff for installation at sites around the Merry Hill Centre as soon as possible.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed



Date

01.02.23

Print name in full Nick Hooper







For: Claimants
Statement of:
Statement no: 1
Exhibits:
Date: 19th January
2023

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM, NO: KB-2022-BHM-000188

BETWEEN:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

-and-

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

Defendants

WITNESS STATEMENT OF NICK HOOPER

I, NICK HOOPER, Maintenance Manager of Dudley Metropolitan Borough Council, Lister Road Depot, Dudley, DY2 8JW, WILL SAY AS FOLLOWS:

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief.
2. This statement is given to update the Court on replacement and additional signs in relation to the Injunction and street racing which have been ordered and installed, or which are planned to be installed within the Dudley Borough.
3. Signs have been designed and produced in both metal and Foamex material. A document showing the design of the metal signs is attached to this statement and marked as **NH1**. A further document, showing the design of the Foamex signs is attached to this statement and marked as **NH2**.
4. A total of 12 metal signs and 36 Foamex signs have been ordered for installation at various sites in the Borough. The metal signs were received in Lister Road Depot on 17th January 2023.
5. Of the 12 metal signs, 5 of these have been ordered to replace existing signage (which is now out of date.) These signs are allocated to be fitted in the following locations, with a photograph of each location being attached to this statement and marked with the indicated exhibit number as follows:
 - Duncan Edwards Way sited between Points 63 and 64 (E:394107 N:289287) **NH3**
 - Duncan Edwards Way sited between Points 108 and 107 (E:394962 N:290346) **NH4**
 - Birmingham New Road (A4123) **NH5**
 - Birmingham Road (A461) **NH6**

- Hagley Road (A456) **NH7**
6. The replacement signs referred to above were installed on 18th January 2023.
 7. In addition to the replacement signs, the remaining 7 metal signs are intended to be installed as follows :
 - 3 signs to be installed on Manor Way (A456)
 - 4 signs to be installed at the entrance ways to the Waterfront, Merry Hill.
 8. The metal signs at the entrances to the Waterfront were installed on 19th January 2023 as follows (a photograph is exhibited of the new sign in each location as indicated)
 - Merry Hill site 1- Entrance to Hop House **NH8**
 - Merry Hill site 2- Entrance to Waterfront East **NH9**
 - Merry Hill site 3- Between Point 21 &22 **NH10**
 - Merry Hill site 4- Off Island to Construction College **NH11**
 9. The signs ordered for Manor Way (A456) are proposed to be sited as follows, with the intention that they should be attached to the rear of existing directional signs (a photograph of the intended site of installation is exhibited as indicated)
 - 1 sign to be sited on the Westbound approach to Grange Road Roundabout **NH12**
 - 1 sign to the Eastbound approach to Grange Road Roundabout **NH13**
 - 1 sign to be sited on M5 Junction 3 exit onto Manor Way **NH14**
 10. The metal signs for Manor Way have been ordered and will be collected on Wednesday 25th January 2023, with installation scheduled for Thursday 26th January 2023.
 11. There has been an issue with delivery of the 36 Foamex signs. These are scheduled to be collected on 25th January 2023. The 6 signs which are intended for installation at Cross Street/Stafford Street Car Park are anticipated to be installed on Friday 27th January 2023.

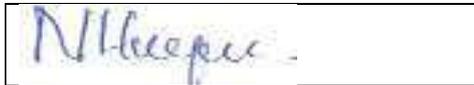
12. New Mill Street/Minorities and Flood Street Car Parks are currently in use as sites or compounds for the Midlands Metro Alliance and are therefore no longer public car parks under the control of Dudley Metropolitan Borough Council.

13. The remaining 30 Foamex signs are intended for installation at sites at Merry Hill Centre. These will be provided to Merry Hill Centre for installation as soon as possible after collection on 25th January 2023. A document showing the proposed locations of the signs is attached to this statement and marked as **NH15**.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed



Date

19.01.23

Print name in full NICHOLAS HOOPER

PLEASE TAKE TIME TO CHECK THE DRAWING AND ADVISE OF ANY CHANGES REQUIRED PRIOR TO APPROVAL.

NH1

FACING

Background: YELLOW
 Border size (mm): varies
 Border colour: BLACK

TEXT

Style: Transport Heavy

Colour: BLACK
 Lowercase(x,height (mm)): 75/80
 Capital height (mm): 105/112

DIMENSION

Width (mm): as detailed
 Height (mm): as detailed
 Area (sq.m): as detailed
 Tolerance: + 5mm
 1

Drawn by: MR

Date: 05/01/2023

Approved for manufacture

Company.....

Sign.....

MR 50



1) at 75 xht
 1525 x 1700 mm
 area: 2.592 sq.m



2) at 80 xht
 1645 x 1800 mm
 area: 2.961 sq.m

PLEASE CHECK AND CONFIRM ALL DETAIL, MATERIAL AND SIZING BEFORE MANUFACTURE COMMENCES

COMMENTS

PLEASE TAKE TIME TO CHECK THE DRAWING AND ADVISE OF ANY CHANGES REQUIRED PRIOR TO APPROVAL.

- NH2



FACING

Background:
YELLOW
Border size (mm):
7.5
Border colour:
BLACK

TEXT

Style:
Transport Heavy

Colour:
/black
Lowercase(x,height (mm)):
20
Capital height (mm):
28

DIMENSION

Width (mm): 400
Height (mm): 500
Area (sq.m): 0.2
Tolerance: + 5mm
0

Drawn by: MR

Date: 05/01/2023

Approved for manufacture

Company.....

Sign.....

MR 0

PLEASE CHECK AND CONFIRM ALL DETAIL, MATERIAL AND SIZING BEFORE MANUFACTURE COMMENCES

NH3



Google

A461

NH4



NH5



NH6



Google

NH7



NH8



NH9



NH10



NH11





NH12



NH14



