

Statement filed on behalf of: Dudley MBC
Statement of: Mark Wilson
Statement No: 2
Dated:
Exhibits: "MW1"
Filed:

CLAIM NO: KB-2022-BHM-000188

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

BETWEEN:

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

APPLICANTS

- and -

PERSONS UNKNOWN

RESPONDENTS

**SECOND WITNESS STATEMENT OF
MARK WILSON**

I, MARK WILSON, Community Safety Officer, will say as follows:-

1. I am employed by Dudley Metropolitan Borough Council as a Community Safety Officer. As the Borough's lead for Anti-Social Behaviour, Car Cruising, Public Space Protection Orders, Prevent and Hate Crime, part of my role is to ensure that Dudley is a safe place to live, work and visit and to work collaboratively across the West Midlands region in respect of community safety issues.

2. Subsequent to my first statement, dated 25th April 2023, I have been asked to update the Court on two issues, the state of repair of the warning signs prohibiting car cruising in the area and the extent to which car cruising is a problem within the area.

State of repair of the warning signs

3. On 9th September 2023, Nick Hooper, Maintenance Manager, Highways, reported that he had undertaken an inspection of all the warning signs within the area and that the signs were intact and free from damage, except for one sign, which required re-alignment. The sign that required re-aligning is depicted in the photograph attached to this statement, marked “**Exhibit MW1**”, which is situated on the splitter island on the Manor Way at the Grange Road Roundabout. It needs re-aligning as it has been turned and is not facing the approaching traffic, so that the sign can be clearly read.

Extent to which car cruising is a problem within the area

4. As the lead Officer for the Authority with responsibility I am aware of significant incidents of car cruising taking place across this borough. This is often raised with me as a concern by members of the public in my daily duties once they become aware of my role. Often, I deliver training in professional settings such as schools and local authority departments and people attending express concern about car cruising especially in respect of Manor Way most recently.

5. Since the injunction was granted on 22nd December 2022, complaints of street racing continue to be received in respect of Manor Way, Halesowen and these have increased during the recent summer months. We are also aware that there continues to be regular 'meet-up's' of groups in car parks across the borough to do 'donut' stunts and speed around the enclosed area. A 'donut' is a manoeuvre performed while driving a vehicle, which entails rotating the rear or front of the vehicle around the opposite set of wheels in a continuous motion, creating a circular skid-mark pattern of rubber on a carriageway and possibly even causing the tires to emit smoke from friction. This has happened in several locations (Waterfront and Showcase Cinema for example); largely at night but there have been such gatherings in the early evenings too.

6. I have witnessed footage on social media of car cruising across the black country and I have seen footage of cars congregating on Manor way in an unsafe way around the shell petrol station.

7. I believe that the injunction has had a positive effect and continues to be a necessary tool to ensure the public safety and protection of law abiding members of the public and businesses who have suffered for many years from the negative impact of car cruising and street racing. However, as sought, the terms of the injunction demonstrably need widening.

8. I believe the facts stated in this statement to be true. I understand that proceedings for contempt 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.

Name of Claimant: Dudley Metropolitan Borough Council

Signed  Date: 22/09/2023

Print Name in Full :MARK WILSON



For: Claimants
Statement of:
Statement no: 1
Exhibits: AC1-AC2
Date: 20th 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 ANDREW CLARKE

I, Andrew Clarke, ASB Team Manager of Sandwell Metropolitan Borough Council, Sandwell Council House, Freeth Street, Oldbury, B69 3DE, 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 write this statement in relation to the Street Racing / Car Cruising Injunction granted at the High Court on the 21st December 2022.
3. Refreshed Signage and the request for new signage was one of the steps set out in terms of one of the requirements set out at Court. All replacements were carried out in a programme of work that took place on 19th January 2023.
4. On 21st December 2022, the court issued directions requiring the claimants file statements demonstrating compliance with the publicity steps of the order, specifically with regard to new and replacement signage.
5. I can confirm that all previous foamex signage in the Borough of Sandwell, have been replaced with new and installed at the following locations; these having been identified as hotspots for the activity prohibited by this injunction.
6. Retail Park Entrance of Axeltree Way (J9 towards Wednesbury), WS10 9QY.
7. Axeltree Way Island (IKEA Side), WS10 9SF
8. Axeltree Way Junction (near to Curry's PC World), WS10 9QY
9. Axeltree Way Island (near to Burger King), WS10 9QY
10. MoorCroft Drive at its junction with Hallens Drive, WS10 7DD
11. Hallens Drive Island, at its junction with Patent Drive, WS10 7XB
12. Hallens Drive (Island Junction nearest canal), WS10 7DD

13. A41 Island Great Bridge (near to Olympus Distribution), DY4 7HY
14. Brickhouse Lane South (outside Asda petrol station), DY4 7HJ
15. Entrance to McDonalds Car Park, Great Bridge, DY4 7HJ
16. Entrance to Asda Retail Park (Great Bridge Street Junction), B70 0EN
17. Dudley Port towards Great Bridge (prior to junction with Sedgley Road East), DY4 7RL
18. Green Street (Junction with Kendrick Way), B70 6DR
19. A4182 Kendrick Way section (heading towards West Bromwich), B70 1AG
20. A4182 Kendrick Way section (heading away from West Bromwich), B70 6EA
21. Black Lake (Junction with New Swan Lane), towards Wednesbury, B70 0FT
22. Birchley Retail Park (Former Toys R Us site), Entrance from A4034, B69 4RJ
23. Birchley Retail Park (Former Toys R Us site), Centre of Car Park, B69 4RJ
24. Birchley Retail Park (Former Toys R Us site), Exit onto A4123, B69 4RJ
25. Sample photographs, showing some of the new/replacement signage in situ, is here marked as “**AC1**” which I exhibit to my statement.
26. I can confirm that all previous Large Metal Signage has been maintained or renewed at the following locations; which have been identified as hotspots for the activity prohibited by this injunction.
27. A41 (Black Country Route, near to Dreams Superstore), WS10 7DZ
28. J2 of M5, motorway junction, exit onto Birchley Island, B69 2BD
29. Sample photographs, showing some of the new/replacement signage in situ, is here marked as “**AC2**” which I exhibit to my statement.

30. I can confirm that new, foamex signage, has been ordered for future installation at the following location; this having been newly identified as a hotspot for the activity prohibited by this injunction. I am advised by our highways team, that the installation of this signage is programmed to take place within the next eight weeks.
31. Crystal Drive Smethwick, junction entering onto A457, B66 1QG
32. I can confirm that new, metal signage, has been ordered for future installation at the following locations; these having been newly identified as hotspots for the activity prohibited by this injunction. I am advised by our highways team, that the installation of this signage is programmed to take place within the next eight weeks.
33. A457, Smethwick (Junction with Crystal Drive), towards Smethwick, B66 1NN
34. A457, Smethwick (Junction with Tram Way), towards Oldbury, B66 1NR

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

20th January 2023

Print name in full Andrew Clarke

For: Claimants
Statement of:
Statement no: 1
Exhibits: AC1 – AC2
Date: 20 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-

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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
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WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR
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OBSTRUCTIVE DRIVING**

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

Defendants

EXHIBIT AC1

This is the document referred to as "Exhibit AC1" in the witness statement of Andrew Clarke dated
20. 01.2023









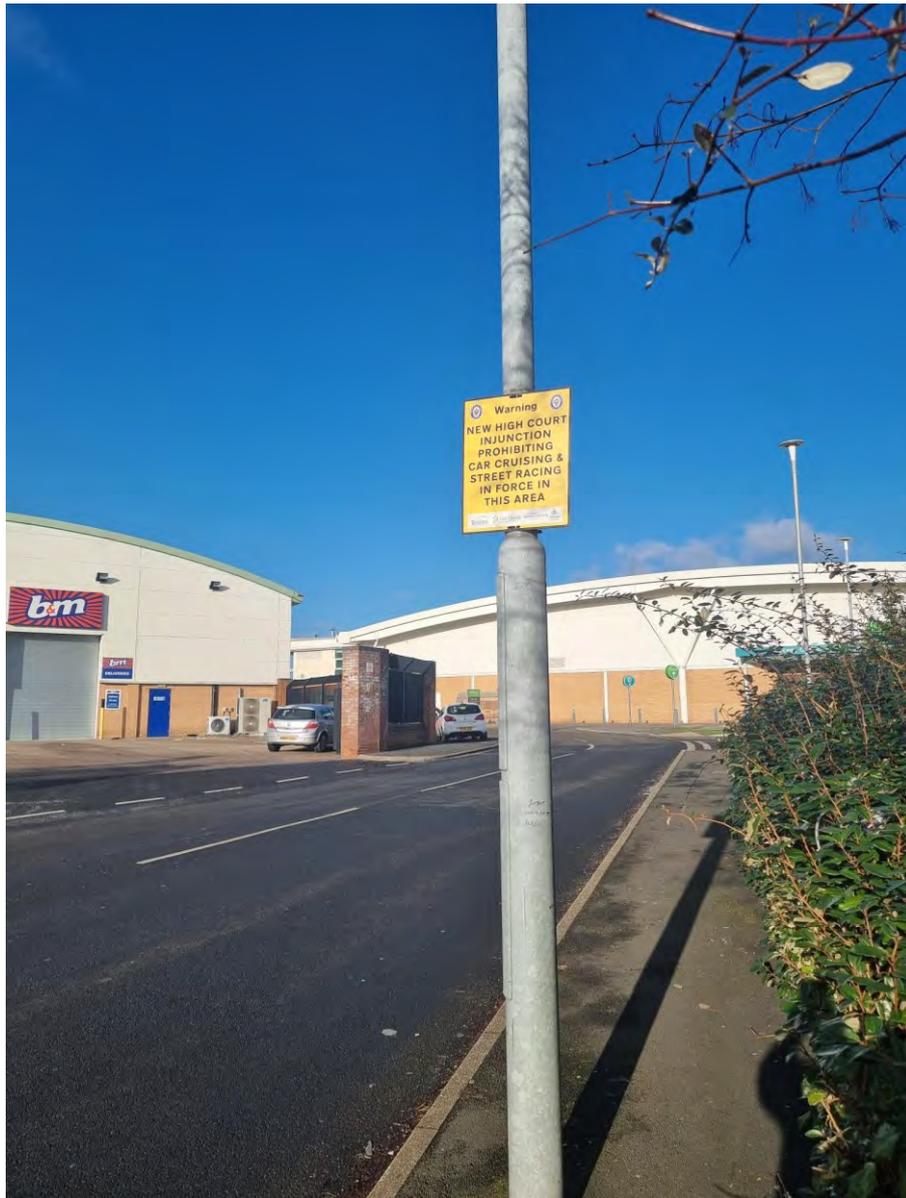










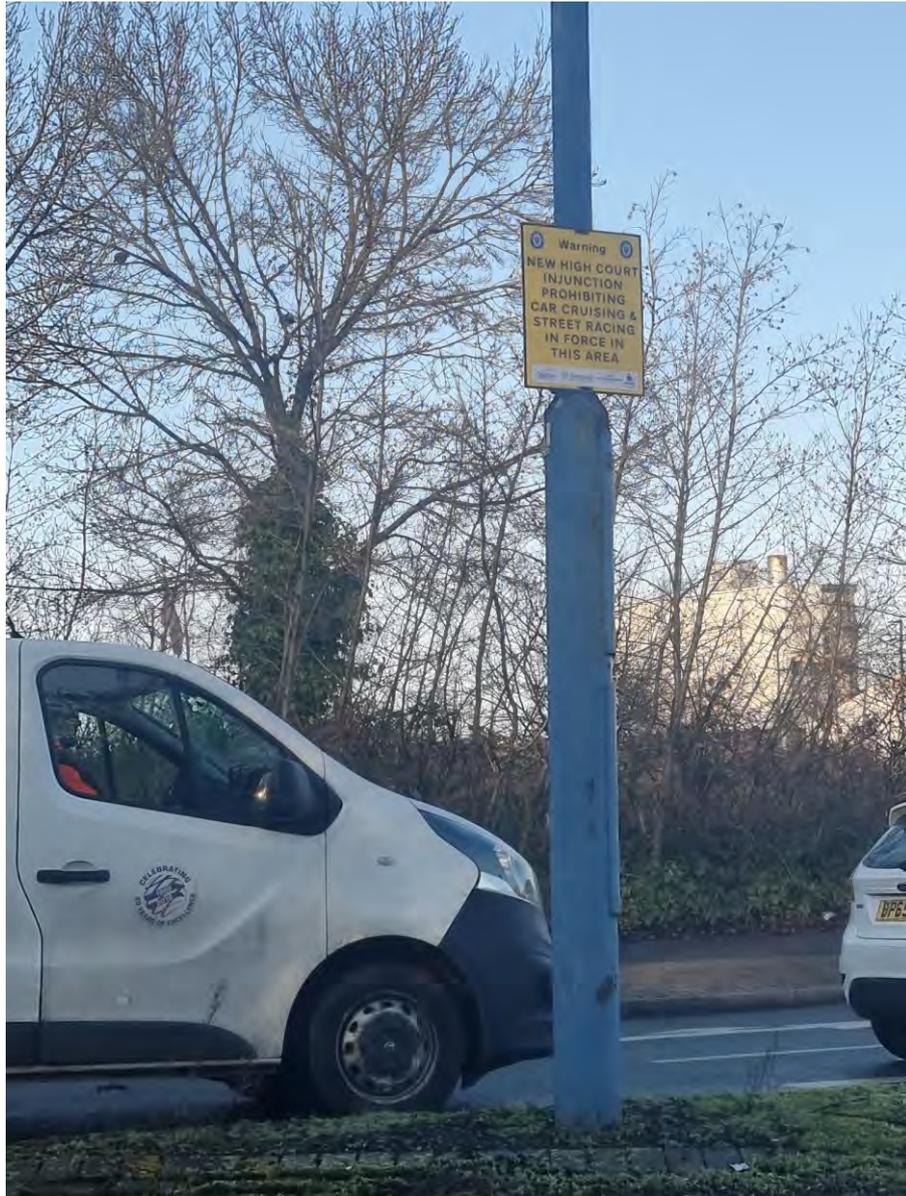
















For: Claimants
Statement of:
Statement no: 1
Exhibits: AC1 – AC2
Date: 20 January 2023

**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
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Claimants

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OBSTRUCTIVE DRIVING**

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

Defendants

EXHIBIT AC2

This is the document referred to as "Exhibit AC2" in the witness statement of Andrew Clarke dated
20. 01.2023







For: Claimants
Statement of: S Gittins
Statement no: 2
Exhibits: SJG4
Date: 24 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-

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

Defendants

WITNESS STATEMENT OF STEVEN GITTINS

I, Steven John Gittins, Community Safety Manager of Walsall Metropolitan Borough Council, Civic Centre, Darwall Street, Walsall, WS1 1TP. 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. An audit of all permanent and temporary (foamex) Car Cruising signs in the borough of Walsall was undertaken during August 2022. All of the signs detailed in the audit have now been replaced with updated Street Racing/Car Cruising signs on a like for like basis. All of the fixed signs have been replaced with new permanent signage and all of the temporary signs have been replaced with updated foamex signage. In addition, the permanent sign that was missing on the A454 Keyway, Walsall bound exit off Portabello has now been re-instated with a new, updated permanent sign. The audit document, which originally detailed the location and condition of each sign has been updated with images of the new signs in situ. I now produce as **Exhibit SJG4** the updated audit of Street Racing/Car Cruising signage in Walsall.

3. The lists below detail the location of fixed and temporary Street Racing/Car Cruising signs in Walsall:

Fixed Permanent Signs

- 1 – A454 Little Aston Road
- 2 – A452 Chester Road North
- 3 – A452 Chester Road, Shire Oak Junction
- 4 – A34 Stafford Road, Near Yates Farm
- 5 – A462 Essington Road
- 6 – A4124 Lichfield Road
- 7 – A461 Bescot Road

- 8 – A4031 West Bromwich Road
- 9 – A41 Black Country New Road
- 10 – A454 Keyway, Walsall

Temporary Foamex Signs

- 1 – Brickyard Road Lamppost 3
- 2 – Brickyard Road Lamppost 6
- 3 – Brickyard Road Lamppost 28
- 4 – Brickyard Road Lamppost 29
- 5 – Northgate Way Lamppost 1
- 6 – Northgate Way Lamppost 2
- 7 – Coppice Road Lamppost 3
- 8 – Coppice Road Lamppost 5
- 9 – Coppice Road Lamppost 21
- 10 – Coppice Road Lamppost 22
- 11 – Maybrook Road Lamppost 3
- 12 – Maybrook Road Lamppost 6
- 13 – Maybrook Road Lamppost 13
- 14 – Maybrook Road Lamppost 20
- 15 – Bescot Crescent Lamppost 24
- 16 – Bescot Crescent Lamppost 38
- 17 - Wisemore Stop Sign S05
- 18 – Wisemore Lamppost 6
- 19 – Moxley Road Lamppost 28
- 20 – High Street Moxley, Lamppost 6
- 21 – High Street Moxley, Lamppost 10
- 22 - High Street Moxley, Lamppost 11
- 23 - High Street Moxley, Lamppost 12
- 24 – Black Country New Road Lamppost 13
- 25 – Black Country New Road Lamppost 12
- 26 - Black Country New Road Lamppost 18
- 27 - Black Country New Road Lamppost 19

28 - Black Country New Road Lamppost 35

4. It was also suggested that the Black Country Route (BCR), approaching junction 10 should be a location considered for further signage. As a result, it has been determined that four additional signs will be installed at the locations detailed below:
 - 1- BCR - one addition sign on near side verge from Marshland Way
 - 2- BCR – one additional sign on near side following exit from Armstrong Way
 - 3- BCR - Two additional signs one in each direction will be installed in central reservation grass area between Darlaston Lane and The Keyway
5. For each of the four new signs, the poles will be delivered, and the new signage manufactured on 27/01/23. New posts and signage will be installed week commencing 30/01/23.
6. Consideration has also been given to additional fixed signage on the Black Country Route between the large island at junction 10 and the exit/roundabout that leads to the Boundary Outlet. This area is, however, within the designated area for the major Junction 10 works and is currently under the control of Sisk. Signs have been ordered which will be delivered on the 30/1/23. These final additional signs will be installed once the site has been handed back over to Walsall Council.
7. It was further suggested that the Black Country Route may benefit from additional temporary/foamex signage at a number of locations. However, upon further consideration it has been determined that the dimensions of the smaller, temporary signage are unsuitable for, and would not be sufficiently visible, on a road with a 50mph speed limit.

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

24/01/2023

Print name in full

Steven John Gittins

For: Claimants
Statement of: S Gittins
Statement no: 2
Exhibits: SJG4
Date: 24 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
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WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

Defendants

WITNESS STATEMENT OF STEVEN GITTINS

This is the document referred to in as "Exhibit SJG4" in the witness statement of Steven Gittins dated 24 January 2023.

High Court Injunction – Street Racing Signs (Car Cruising)

Location	Sign Type	Sign Present	Comments	Photograph	New Replaced signs
A454 Little Aston Road	Large fixed	Yes	<p>Sign and post in good condition.</p> <p>The stickers with the police and borough names have faded.</p> <p>Trees need cutting back.</p>		
A452 Chester Road North	Large fixed	Yes	<p>Sign and post in good condition but need cleaning.</p> <p>The stickers with the police and borough names have faded.</p>		

<p>Brickyard Lane Lamppost 3</p> <p>Brickyard Road not lane</p>	<p>Small foamex</p>	<p>No</p>	<p>Missing sign but there is evidence of where the sign was.</p> <p>Sign could do with being raised slightly when replaced.</p> <p>Post in good condition.</p> <p>Trees could possibly do with cutting back.</p>		
<p>Brickyard Lane Lamppost 6</p> <p>Brickyard Road, not lane.</p>	<p>Small foamex</p>	<p>Yes</p>	<p>Damaged sign.</p> <p>Post in good condition.</p>		
<p>Brickyard Lane Lamppost 28</p> <p>Brickyard Road not lane</p>	<p>Small foamex</p>	<p>Yes</p>	<p>Sign and post in good condition.</p> <p>Trees are not an issue at present but may need cutting back at some point.</p>		

<p>Brickyard Lane Lamppost 29</p> <p>Brickyard Road Not Lane</p>	<p>Small foamex</p>	<p>Yes</p>	<p>Faded sign.</p> <p>Post in good condition.</p>		
<p>Northgate Way Lamppost 1</p>	<p>Small foamex</p>	<p>No</p>	<p>Missing sign and no evidence of a sign previously being present.</p> <p>Post in good condition.</p>		
<p>Northgate Way Lamppost 2</p>	<p>Small foamex</p>	<p>Yes</p>	<p>Damaged sign.</p> <p>Sign needs re-positioning so it is facing the correct way.</p> <p>Post in good condition.</p>		

<p>Coppice Road Lamppost 3</p>	<p>Small foamex</p>	<p>Yes</p>	<p>Sign and post in good condition but need cleaning.</p> <p>Trees need cutting back.</p>		
<p>Coppice Road Lamppost 5</p>	<p>Small foamex</p>	<p>Partly</p>	<p>Damaged sign with only a small section of the sign present.</p> <p>Post in good condition.</p>		

<p>Coppice Road Lamppost 21</p>	<p>Small foamex</p>	<p>Yes</p>	<p>Sign and post in good condition but need cleaning.</p>		
<p>Coppice Road Lamppost 22</p>	<p>Small foamex</p>	<p>Yes</p>	<p>Sign and post in good condition but need cleaning.</p> <p>The sign is obstructed slightly by the bus stop.</p>		

<p>Maybrook Road Lamppost 3</p>	<p>Small foamex</p>	<p>Yes</p>	<p>Damaged sign.</p> <p>Sign needs re-positioning to face the correct way.</p> <p>Post in good condition.</p> <p>Trees are not an issue at present but may need cutting back at some point.</p>		
<p>Maybrook Road Lamppost 6</p>	<p>Small foamex</p>	<p>No</p>	<p>Missing sign.</p> <p>Post in good condition.</p>		

<p>Maybrook Road Lamppost 13</p>	<p>Small foamex</p>	<p>No</p>	<p>Missing sign. Post in good condition.</p>		
<p>Maybrook Road Lamppost 20</p>	<p>Small foamex</p>	<p>No</p>	<p>Missing sign. Post in good condition.</p>		

<p>A452 Chester Road, Shire Oak Junction</p>	<p>Large fixed</p>	<p>Yes</p>	<p>Sign and post in good condition but need cleaning.</p> <p>The stickers with the police and borough names have faded.</p>		
<p>A34 Stafford Road near Yates Farm</p>	<p>Large fixed</p>	<p>Yes</p>	<p>Sign and post in good condition but need cleaning.</p> <p>The stickers with the police and borough names have faded.</p> <p>Trees are not an issue at present but may need cutting back at some point.</p>		

<p>A462 Essington Road near footway link to Kewstoke Close</p>	<p>Large fixed</p>	<p>Yes</p>	<p>Sign and post in good condition.</p> <p>The stickers with the police and borough names have faded.</p>		
<p>A4124 Lichfield Road near footpath link to Highmoor Close</p>	<p>Large fixed</p>	<p>Yes</p>	<p>Sign and post in good condition.</p> <p>The stickers with the police and borough names have faded.</p> <p>Trees are not an issue at present but may need cutting back at some point.</p>		

<p>A461 Bescot Road near depot at M6 J9</p>	<p>Large fixed</p>	<p>Yes</p>	<p>Sign and post in good condition but need cleaning.</p> <p>The stickers with the police and borough names have faded.</p>		
<p>Bescot Crescent Lamppost 24</p>	<p>Small foamex</p>	<p>Yes</p>	<p>Sign and post in good condition but need cleaning.</p> <p>Sign needs re-positioning to face the right way.</p>		
<p>Bescot Crescent Lamppost 38</p>	<p>Small foamex</p>	<p>Yes</p>	<p>Slightly faded sign but otherwise in good condition.</p> <p>Post in good condition.</p>		

<p>A4031 West Bromwich Road near Greenside Way</p>	<p>Large fixed</p>	<p>Yes</p>	<p>Sign and post in good condition but need cleaning.</p> <p>The stickers with the police and borough names have faded.</p>		
<p>Wisemore Stop Sign S05</p>	<p>Small foamex</p>	<p>Yes</p>	<p>Sign and post in good condition but need cleaning.</p> <p>Sign could do with being raised slightly.</p>		

<p>Wisemore Lamppost 6</p>	<p>Small foamex</p>	<p>No</p>		<p>Subsequently Located on post opposite pedestrian crossing.</p>	
<p>Moxley Road Lamppost 28</p>	<p>Small foamex</p>	<p>Yes</p>	<p>Sign and post in good condition but need cleaning.</p>		

<p>High Street, Moxley Lamppost 6</p>	<p>Small foamex</p>	<p>No</p>	<p>Missing sign and no evidence of a sign previously being present.</p> <p>Post in good condition.</p> <p>The bus stop may obstruct the sign when present.</p>		
<p>High Street, Moxley, lamppost 10</p>	<p>Small foamex</p>	<p>Yes</p>	<p>Sign and post in good condition but need cleaning.</p> <p>Trees need cutting back.</p>		 <p>Note this is lamp post 11</p>

<p>High Street, Moxley Lamppost 11</p>	<p>Small foamex</p>	<p>Yes</p>	<p>Slightly faded sign but otherwise in good condition, just needs cleaning.</p> <p>Post in good condition.</p> <p>Trees need cutting back.</p>		 <p>Note this is Lamp post number 10</p>
<p>High Street, Moxley Lamppost 12</p>	<p>Small foamex</p>	<p>No</p>	<p>Missing sign but there is evidence of where the sign was.</p> <p>Sign could do with being raised slightly when replaced.</p> <p>Post in good condition.</p>		

<p>Black Country New Road (on traffic island by junction with Church Street opposite Aldi) Lampost 13</p>	<p>Small foamex</p>	<p>No</p>	<p>Unable to identify lamppost 12 and no evidence of any signs in the surrounding area.</p> <p>Subsequently located on lamppost 13. Brackets but no sign.</p>		
<p>A41 Black Country New Road between Southern Way and Bull Lane</p>	<p>Large fixed</p>	<p>Yes</p>	<p>Sign and post in good condition but need cleaning.</p> <p>The stickers with the police and borough names have faded.</p> <p>Trees need cutting back.</p>		
<p>Black Country New Road Lamppost 12</p> <p>Hollyhead Road jct of Rowley View, leading to heathacres and Margaret Road.</p>	<p>Small foamex</p>	<p>Yes</p>	<p>Damaged sign.</p> <p>Signs needs re-positioning to face the correct way.</p> <p>Post needs cleaning and re-painting.</p>		

<p>Black Country New Road Pedestrian Crossing Lamppost 18.</p> <p>Corner of Dangerfield Lane</p>	<p>Small foamex</p>	<p>Yes</p>	<p>Slightly faded sign but otherwise in good condition, just needs cleaning. Sign needs re-positioning to face the correct way. Post in good condition but needs cleaning. Trees are not an issue at present but may need cutting back at some point.</p>		
<p>Black Country New Road Pedestrian Crossing Lamppost 19.</p> <p>Road opposite Dangerfield Lane.</p>	<p>Small foamex</p>	<p>Yes</p>	<p>Sign and post in good condition but need cleaning. Sign needs re-positioning to face the correct way.</p>		

<p>Black Country New Road, towards Moxley. Lamppost 35. Opposite All St's Church.</p>	<p>Small foamex</p>	<p>No</p>	<p>Missing sign and no evidence of a sign previously being present.</p> <p>Post needs cleaning and re-painting.</p>		<p>Installed on Lamppost 34</p> 
<p>A454 Keyway, Walsall bound exit off Portobello Island</p>	<p>Large fixed</p>	<p>No</p>	<p>Missing sign but there are posts with no sign attached.</p>	<p>Unable to obtain a photograph of this location.</p>	

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY

Claim No. KB-BHM-2022-000188

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 PAUL GALE

6. Miss WIKTORIA SCZCUBLINSKA

7. Mr ISA IQBAL

8. Mr MASON PHELPS

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 15 locations, detailed below were identified for the installation of signage in 2023. 10 of these are adjacent to the Black Country Route and require the larger metal signs. 5 are in streets giving access to the Black Country Route where the smaller Foamex signs are suitable.

Metal Signs

- 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)
- 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

Foamex signs

- Springvale Avenue (3 no.)
- Springvale Way (2 no.)

The locations of these signs are shown in the document attached to this statement marked as TP2.

5. Signage as above was installed in 2023. An inspection of signage on 05 February 2024 found the following defects.

- Metal sign at Black Country Route parallel to Nice 1 Limited Off Coseley Road Island Lamppost 062 in need of repair/replacement
- 2 Foamex signs in Springvale Way in need of replacement

These are anticipated to be rectified by 01 March 2024. All other signage is in place and correct.

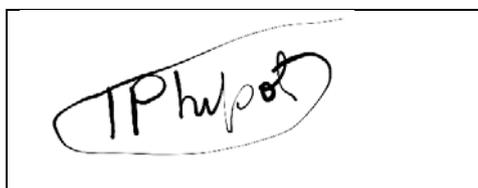
Two Foamex signs were installed in error on the Black Country Route. These are not effective in this location being too small to be read at speed. As there is a larger metal sign on this section of road, these Foamex signs will not be maintained or replaced.

6. Details of the above signs and their locations have been forwarded for inclusion on the Council's website on the following link <https://wolverhampton.maps.arcgis.com/apps/webappviewer/index.html?id=f7be734351534608907e3162133bcb74> along with a contact link [Contact Roads | City Of Wolverhampton Council](#) and phone number 01902 551155 for reporting missing or damaged signs.
7. The above signs will be inspected as part of a regular Inspection Regime. Starting by 01 April 2024 signs on the Black Country Route will be checked every two months and those on minor roads every three months. Any missing or damaged signs will be repaired or replaced promptly.

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

09/02/2024

Print name in full Tim Philpot

Car Cruising & Street Racing Injunction 2024
 Witness Statement (Wolverhampton)

Appendix TP1

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 (mm):	20
Capital height (mm):	28
DIMENSION	
Width (mm):	400
Height (mm):	500
Area (sq.m):	0.2
Tolerance +	5mm
	0

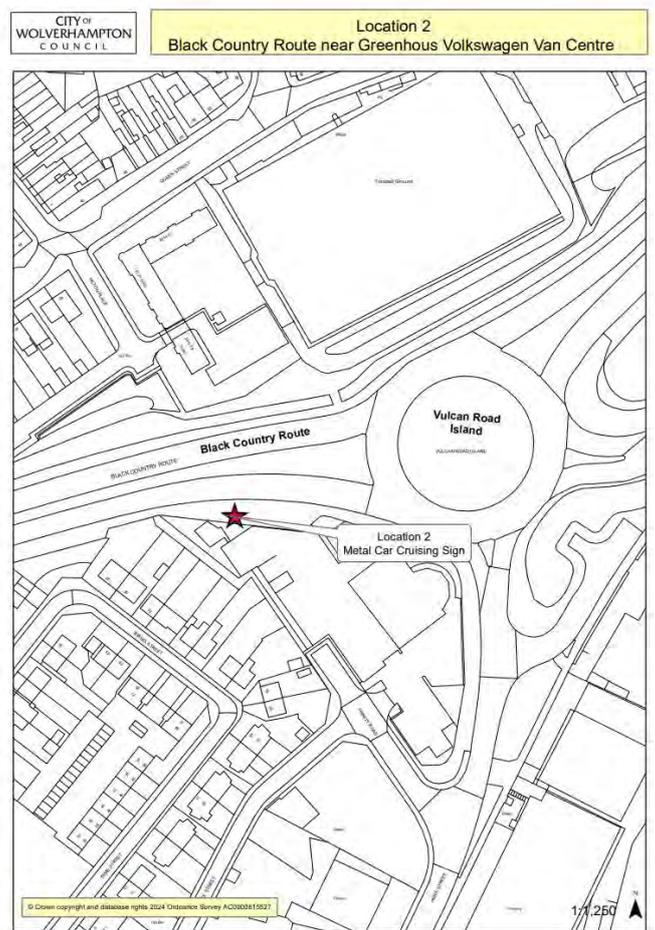
Foamex Sign

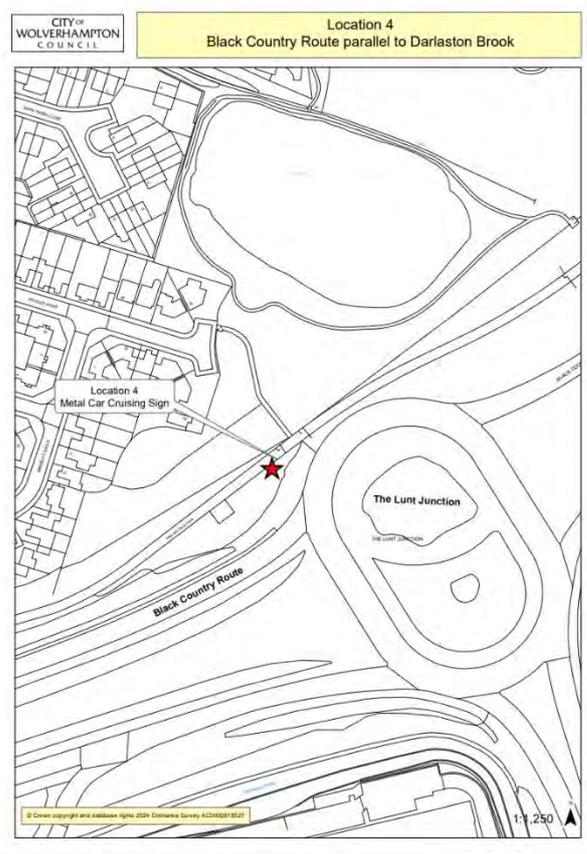
Car Cruising & Street Racing Injunction 2024

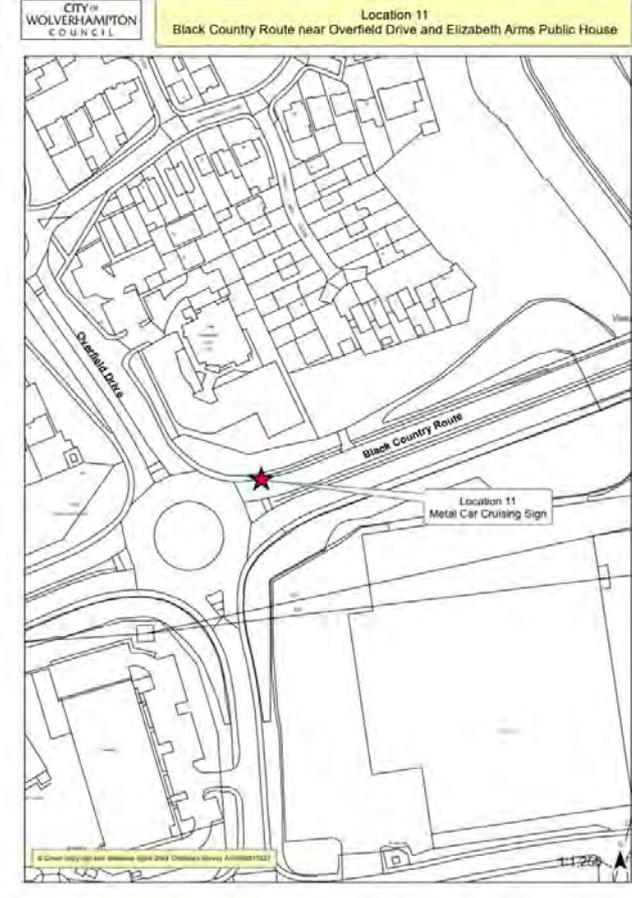
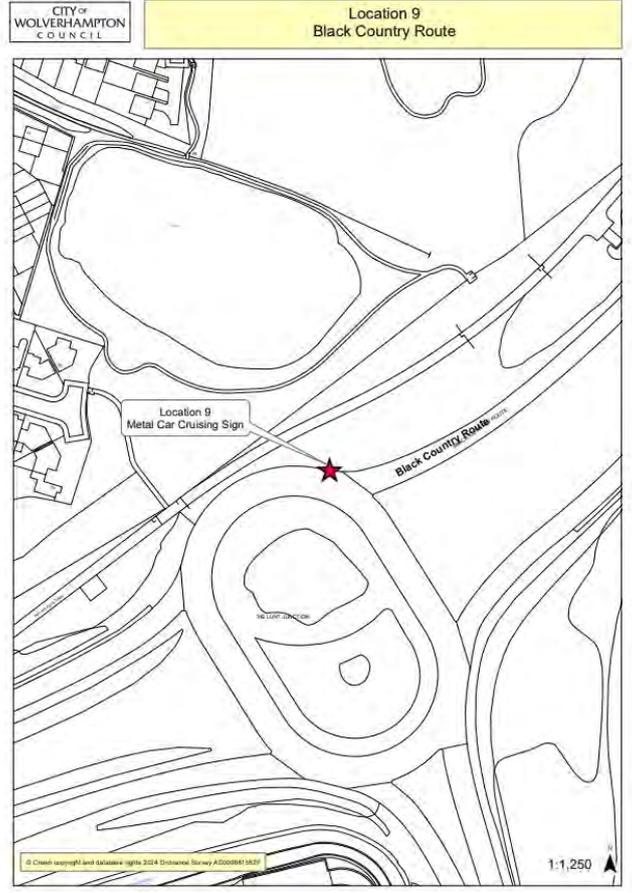
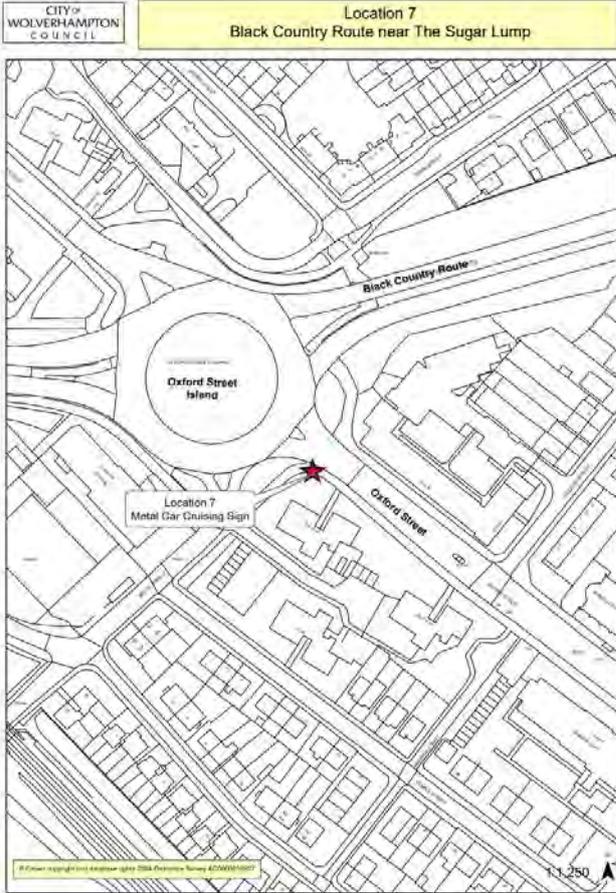
Witness Statement (Wolverhampton)

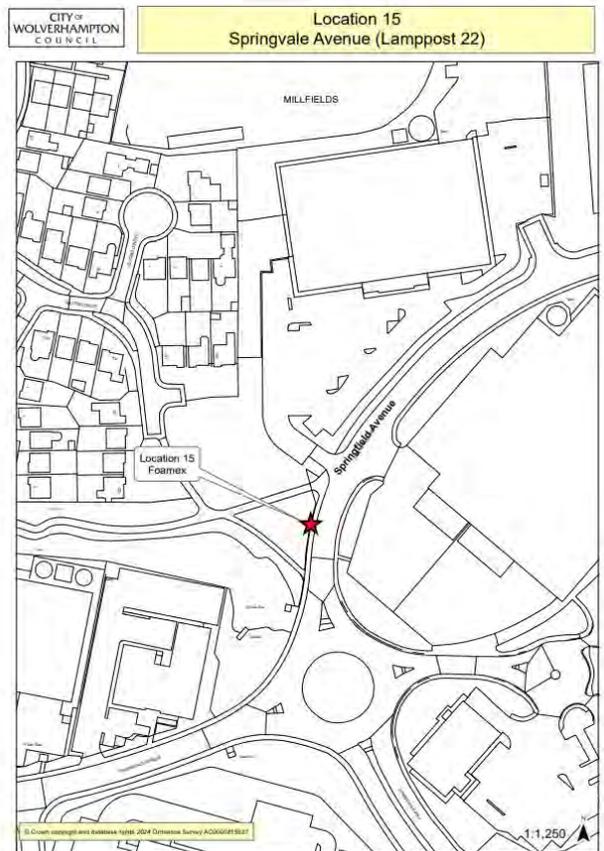
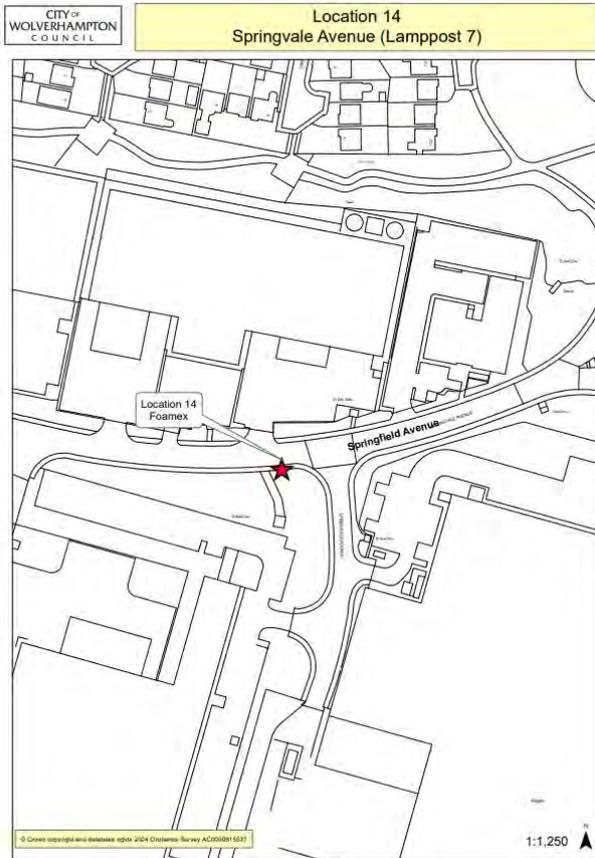
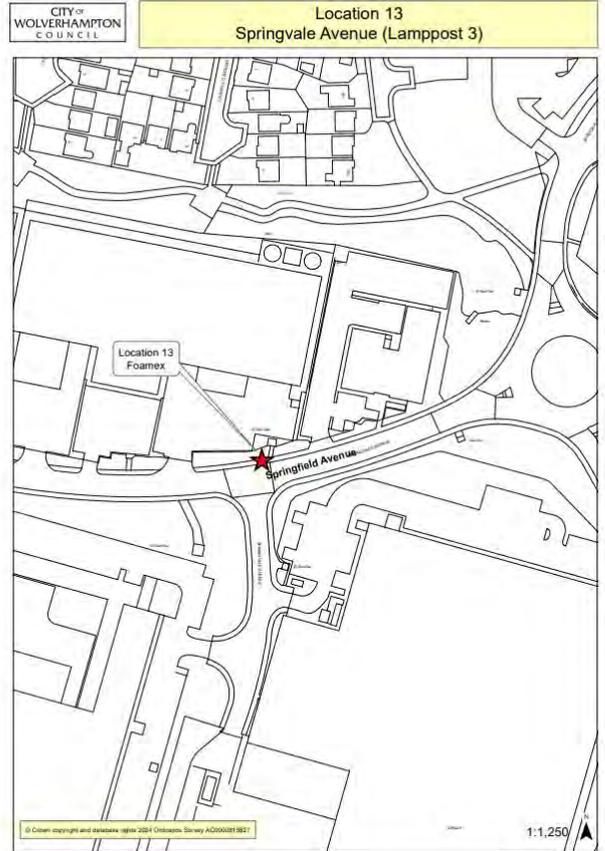
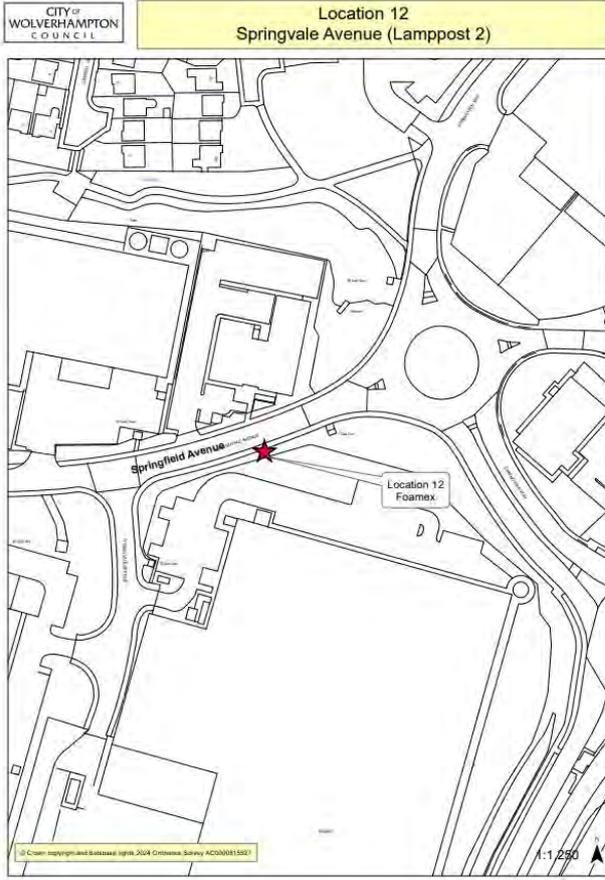
Appendix TP2

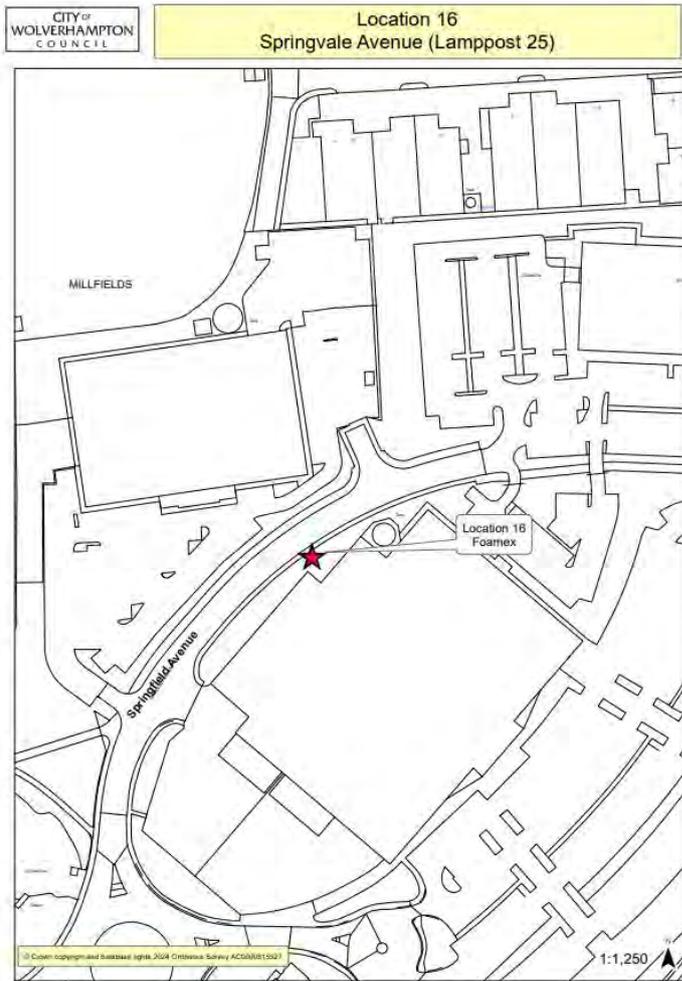
Sign Locations











For: Claimants
Statement of:
Statement no: 2
Exhibits: AC3-AC5
Date: 25 January 2024

**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

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

Defendants

WITNESS STATEMENT OF ANDREW CLARKE

I, Andrew Clarke, ASB Town Lead of Sandwell Metropolitan Borough Council, Sandwell Council House, Freeth Street, Oldbury, B69 3DE, 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 write this statement in relation to the Street Racing / Car Cruising Injunction granted at the High Court on the 21st December 2022, and in response to their directions in this matter.
3. This is my second statement in these proceedings.
4. Confirmation of all signage locations in Sandwell, was one of the steps set out in terms of one of the requirements set out at Court.
5. Having undertaken an inspection on the morning of 17th January 2024, I can confirm that signage is currently displayed at the following locations:
6. A temporary sign is displayed at Retail Park Entrance of Axeltree Way (J9 towards Wednesbury), WS10 9QY.
7. A temporary sign is displayed at Axeltree Way Junction (near to Curry's PC World), WS10 9QY
8. A temporary sign is displayed at Axeltree Way Island (near to Burger King), WS10 9QY
9. A temporary sign is displayed at MoorCroft Drive at its junction with Hallens Drive, WS10 7DD
10. A temporary sign is displayed at Hallens Drive Island, at its junction with Patent Drive, WS10 7XB

11. A permanent sign is displayed along the A41 Black Country New Road, near to the Dreams Superstore at its junction with Javelin Park.
12. A temporary sign is displayed at A41 Island Great Bridge (near to Olympus Distribution), DY4 7HY
13. A temporary sign is displayed at the entrance to Asda Retail Park (Great Bridge Street Junction), B70 0EN
14. A temporary sign is displayed at Dudley Port towards Great Bridge (prior to junction with Sedgley Road East), DY4 7RL
15. A temporary sign is displayed at Green Street (Junction with Kenrick Way), B70 6DR
16. A temporary sign is displayed A4182 Kenrick Way starting section (heading away from West Bromwich), B70 6EA
17. A temporary sign is displayed A4182 Kenrick Way end section (heading away from West Bromwich), B70 6EA
18. A temporary sign is displayed at A4182 Kenrick Way Start section (heading towards West Bromwich), B70 1AG
19. A temporary sign is displayed at A4182 Kenrick Way (heading towards West Bromwich, near the junction with Union Street), B70 1AG
20. A temporary sign is displayed at Black Lake (Junction with New Swan Lane), towards Wednesbury, B70 0FT
21. A temporary sign is displayed at Birchley Retail Park (Former Toys R Us site), Entrance from A4034, B69 4RJ

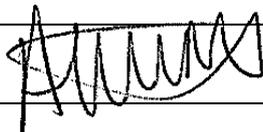
22. A temporary sign is displayed at Birchley Retail Park (Former Toys R Us site), Exit from Car Park, B69 4RJ
23. A permanent sign is displayed at the exit from Junction 9 of the M5, at its junction with Birchley Island.
24. During the inspection of the signage, photographs were taken. It was not possible to photograph all signs as I undertook the inspection in an unliveried personal vehicle and not all locations were safe for alighting. However, most locations were photographed. These photographs are here marked **AC3**, which I exhibit to my statement.
25. The inspection also confirmed that following signs, previously erected and inspected, have been noted as missing. Replacements have been requested from the councils Highways Team, who have also been informed of the courts requirement that they be installed (or scheduled for installation) by no later than 1st March 2024.
26. Axeltree Way Island (IKEA Side), WS10 9SF
27. Brickhouse Lane South (outside Asda petrol station), DY4 7HJ
28. Entrance to McDonalds Car Park, Great Bridge, DY4 7HJ
29. The inspection and maintenance schedule for these signs will be minimally once every 6 months and more frequently should resources permit it.
30. As of 18th January 2024, I can confirm that Sandwell Council have provided a phone number and e-mail address for people to contact to report missing signs, on our dedicated car cruising injunction webpage at <https://www.sandwell.gov.uk/streetracing>.

31. Plans and maps showing the locations of the signage throughout Sandwell are marked **AC4**, which I exhibit to my statement.
32. Plans for further permanent signage include the installation of 2 new permanent signs at Kenrick way, with further permanent signs in the immediate locality. However, the permanent signage along Kenrick Way has been delayed my matters outside the council's control.
33. The current permanent car cruising signs are too large to affix onto standard lighting columns and require additional support poles, which require excavations. Kenrick Way is a traffic sensitive area and has a mainline pipeline running through, as such the council are not allowed to undertake excavations without prior consent from Fisher German, who manage the oil pipeline. We have made a number of requests for this permission; however, it has not yet been granted. We continue to request these permissions urgently and we will undertake the work as soon as permission is secured.
34. Plans and maps showing the locations of the planned new signage throughout Sandwell, are marked **AC5**, which I exhibit to my statement.

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

25/01/2024

Print name in full Andrew Clarke

For: Claimants
Statement of: Andrew Clarke
Statement no: 2
Exhibits: AC3 – AC5
Date: 25 January 2024

**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
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WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR
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WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR
OBSTRUCTIVE DRIVING**

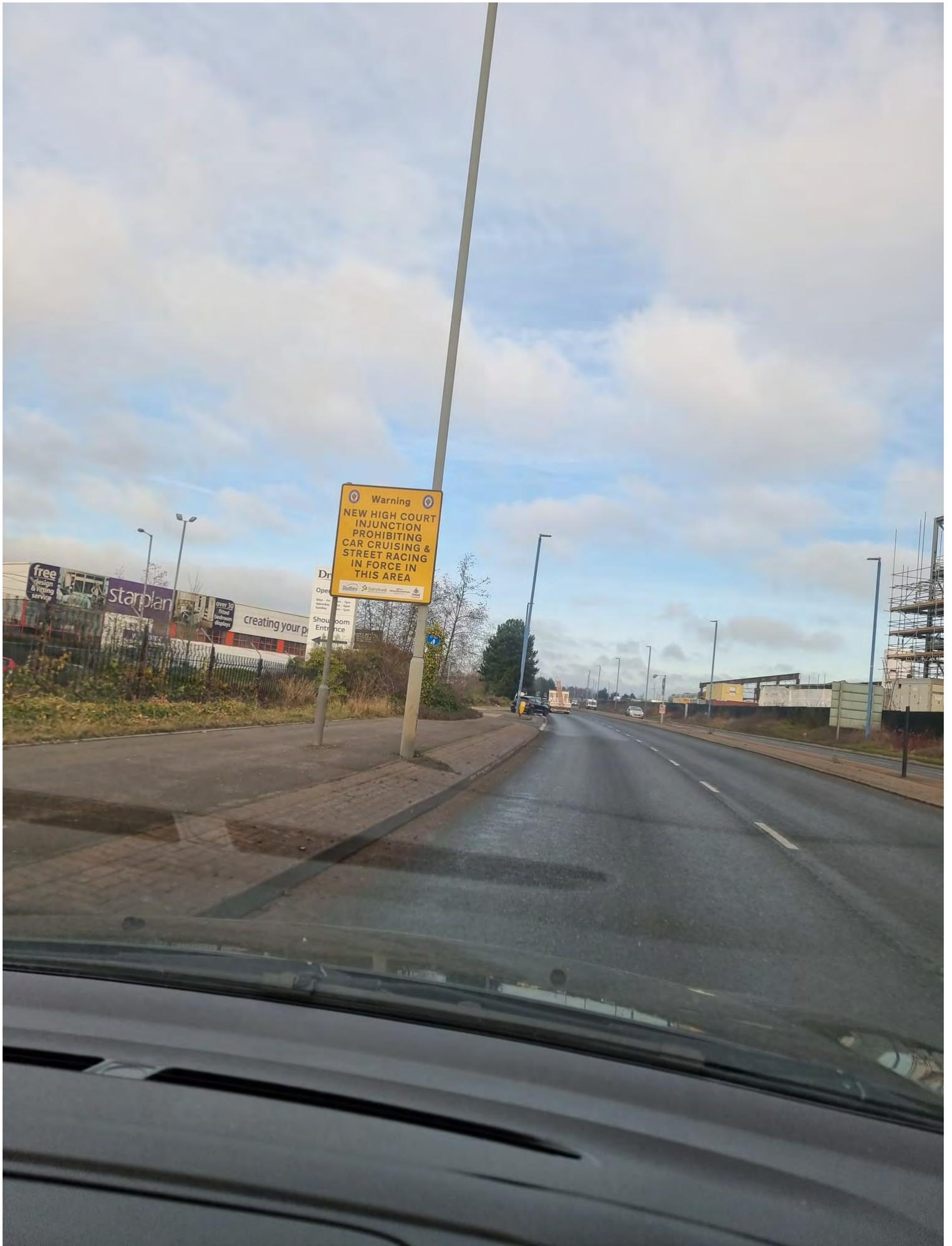
WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

Defendants

EXHIBIT AC3

This is the document referred to as “Exhibit AC3” in the witness statement of Andrew Clarke dated
25 January 2024







(M6, M5)

Walsall (A461)

Dudley (A461)
Wednesbury

Great Bridge (A41)

Warning
NEW HIGH COURT
INJUNCTION
PROHIBITING
CAR CRUISING &
STREET RACING
IN FORCE IN
THIS AREA

Dudley





Warning
NEW HIGH COURT
INJUNCTION
PROHIBITING
CAR CRUISING &
STREET RACING
IN FORCE IN
THIS AREA































For: Claimants
Statement of: Andrew Clarke
Statement no: 2
Exhibits: AC3 – AC5
Date: 25 January 2024

**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
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OBSTRUCTIVE DRIVING**

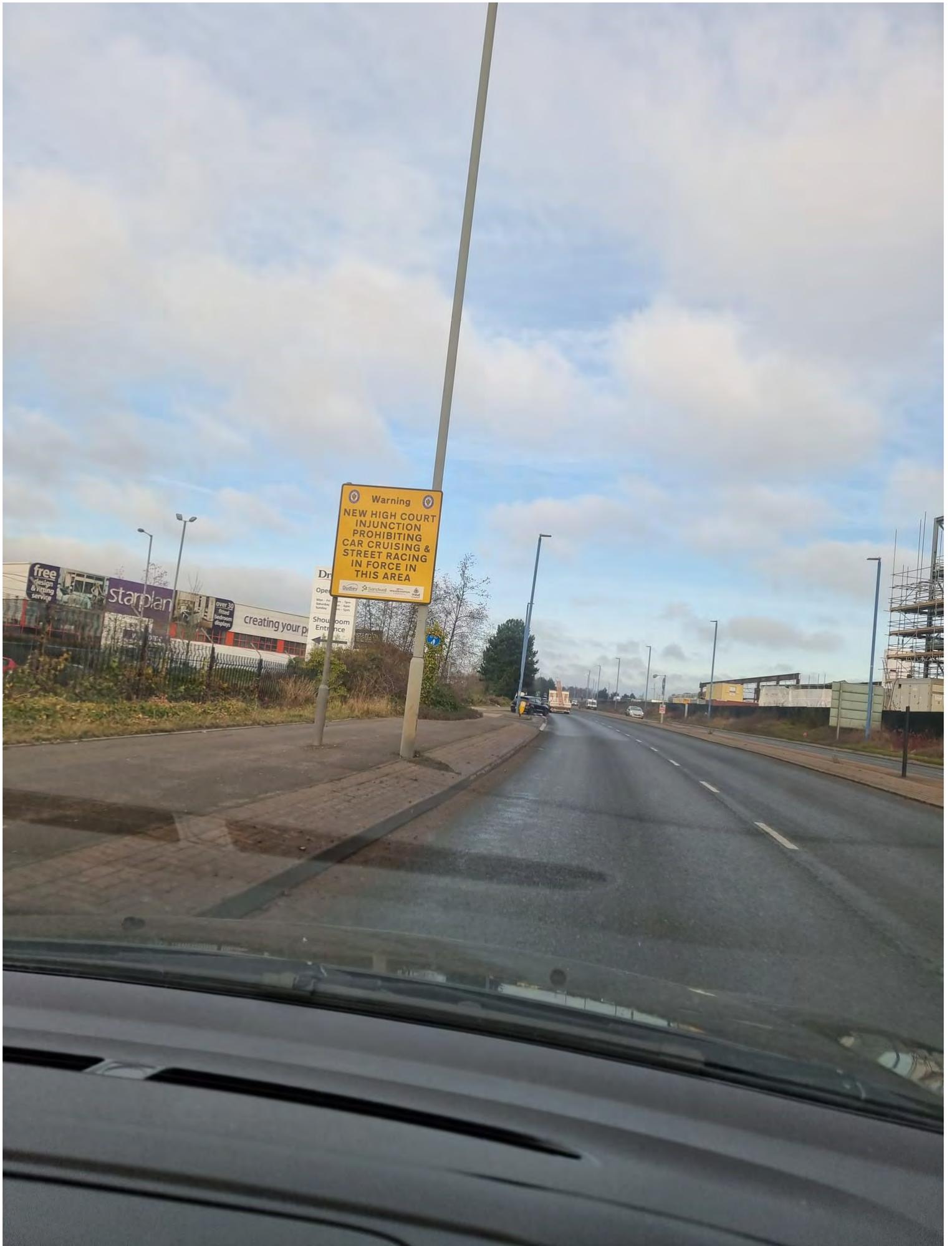
WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

Defendants

EXHIBIT AC3

This is the document referred to as “Exhibit AC3” in the witness statement of Andrew Clarke dated
25 January 2024







(M6, M5)

Walsall (A461)

Dudley (A461)
Wednesbury

Great Bridge (A41)

Warning
NEW HIGH COURT
INJUNCTION
PROHIBITING
CAR CRUISING &
STREET RACING
IN FORCE IN
THIS AREA

Dudley





Retail park

Warning
NEW HIGH COURT
INJUNCTION
PROHIBITING
CAR CRUISING &
STREET RACING
IN FORCE IN
THIS AREA

Dudley Sandwell City of Wolverhampton City of Walsall
NEXT dls sofology M&S TFMOK
Furniture beco Furniture Village Dreams Oak SCS
GALLAGHER SHOPPING PARK
Nando's SMASH BURGER
KFC COSTA SOFA WORKSHOP DECATHLON





























SANDWELL'S CAR CRUISING SIGN LOCATIONS

Wednesbury

Location 1

Wood Green Road at the junction with Axletree Way (J9 towards Wednesbury)

Large Permanent sign

Location 2

Axletree Way Island (IKEA side) Lighting Column No.12

Foamex Sign

Location 3

Axletree Way at the junction near to Curry's, lighting column no.1

Foamex Sign

Location 4

Axletree Way Island (PC World/Burger King/Currys), lighting column no. 34

Foamex Sign

Location 5

Moorcroft Drive (Junction with Patent Drive), lighting column no. 1

Foamex Sign

Location 6

Hallens Drive (Island at the junction with Patent Drive), lighting column no.13

Foamex Sign

Location 7

Hallens Drive (Island at junction nearest the canal, near to Johnsons Control), lighting column no. 19

Foamex Sign

Location 8

A41 (Black Country Route near to Dreams)

Large permanent sign

Tipton

Location 9

A41 Island Great Bridge (by Olympus), lighting column no. R3/5

Foamex Sign

Location 10

Brickhouse Lane South (near to petrol station), lighting column no. 7

Foamex Sign

Location 11

Entrance to McDonalds car park, Great Bridge, attached to lighting column (no number)

Foamex Sign

Location 12

Entrance to Asda Retail (off Great Bridge Street), attached to lighting column

Foamex Sign

Location 13

Dudley Port Junction of Sedgley Road East, prior to the traffic lights, heading towards Great Bridge.
Lighting column no. 34

Foamex Sign

West Bromwich

Location 14

Green Street (Junction of Kenrick Way towards West Bromwich, lighting column no. 12

Foamex Sign

Location 15

Kenrick Way towards West Bromwich (just past Cricketers Arms), lighting column no. 55

Foamex Sign

Location 16

Kenrick Way travelling from West Bromwich, attached to lighting column (no number)

Foamex Sign

Location 17

Black Lake (Junction with New Swan Lane, travelling towards Wednesbury

Foamex Sign

Oldbury

Location 18

Toys R Us car park entrance, attached to lighting column

Foamex Sign

Location 19

Toys R Us, centre of car park, attached to lighting column

Foamex Sign

Location 20

Toys R Us car park exit at junction with Wolverhampton Road, attached to lighting column

Foamex Sign

Location 21

Junction 2, M5, at the junction with Birchley Island

Large permanent sign

IMPORTANT
The Contractor will be responsible for setting out the work. All dimensions must be obtained from or checked on site. Figured dimensions to be used in preference to scale.



LOCATION PLAN

Axletree Way Wednesbury

Location 2
Foamex Car
Cruising sign

B & Q

Location 3
Foamex Car
Cruising sign

Burger King

Location 4
Foamex Car
Cruising sign

Pizza Hut

KFC

JUNCTION 9, M6



Location 1
Large Metal
type sign



HIGHWAYS GROUP MANAGER

Robin Weare, BSc, C.Eng, M.I.C.E. MBA.
Sandwell Council House
Froeth Street Oldbury
West Midlands B69 3DE
E-mail: Highways@sandwell.gov.uk

PROJECT
Car Cruising
Signage

LOCATION
Wednesbury

DRAWING TITLE
Car Cruising
Signage

SCALE Not to Scale

ISSUED BY S Chadwick

DATE 17th Jan 2023

DRAWN BY Sharon Lang

DRAWING No 40972 S/4

IMPORTANT
The Contractor will be responsible for setting out the work. All dimensions must be obtained from or checked on site. Figured dimensions to be used in preference to scale.

LOCATION PLAN

Hallen Drive / Patent Drive Wednesbury



Location 6
Foamex Car Cruising sign

Location 5
Foamex Car Cruising sign

Location 7
Foamex Car Cruising sign



Location 8
Large Metal type sign



HIGHWAYS GROUP MANAGER

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West Midlands B69 3DE
E-mail: Highways@sandwell.gov.uk

PROJECT
Car Cruising Signage

LOCATION
Wednesbury

DRAWING TITLE
Car Cruising Signage

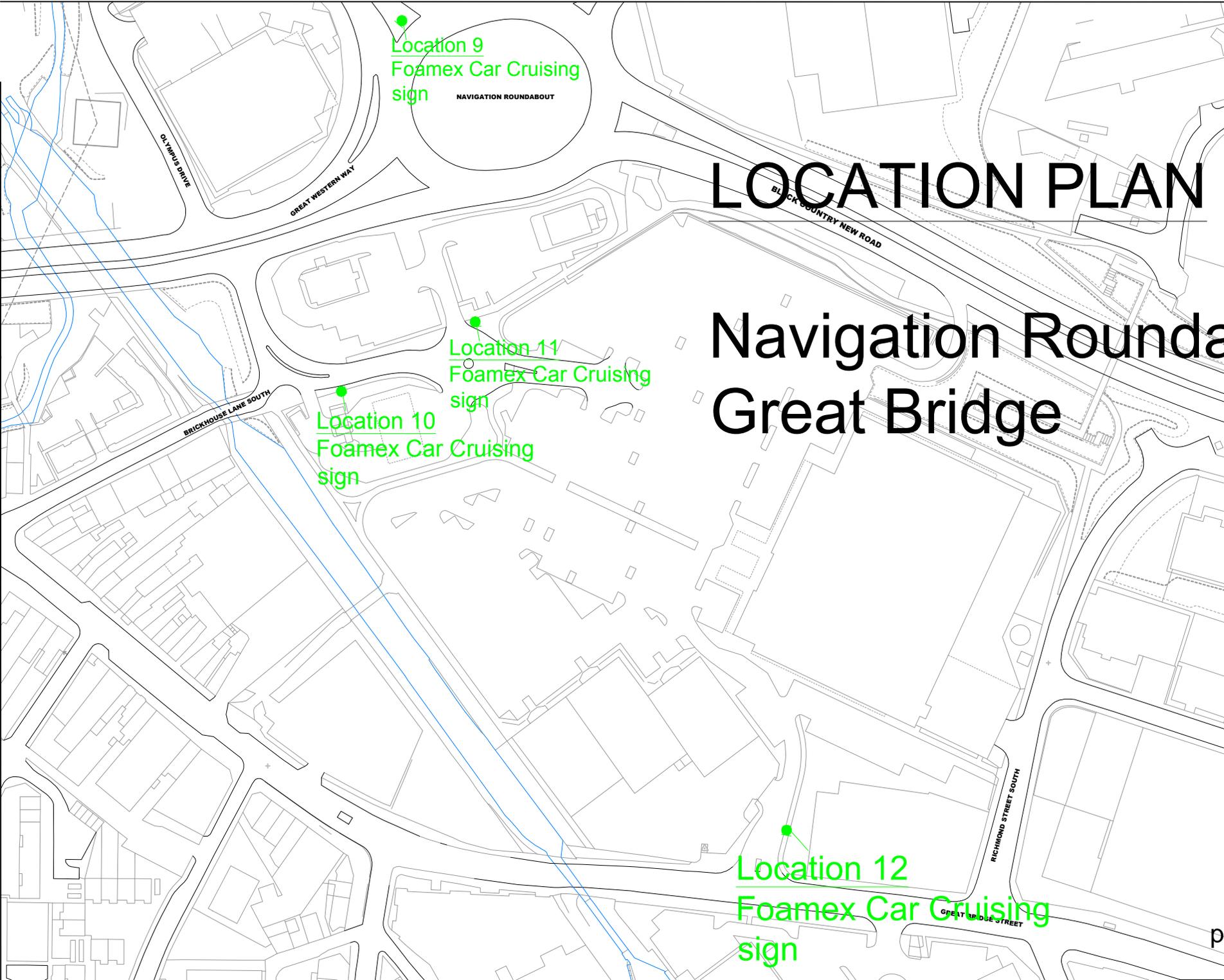
SCALE Not to Scale

ISSUED BY S Chadwick

DATE 17th Jan 2023

DRAWN BY Sharon Lang

DRAWING No 40972 /1 S/4



LOCATION PLAN

Navigation Roundabout Great Bridge

Location 9
Foamex Car Cruising
sign

Location 11
Foamex Car Cruising
sign

Location 10
Foamex Car Cruising
sign

Location 12
Foamex Car Cruising
sign

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IMPORTANT
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for setting out the work.
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Figured dimensions to be used in
preference to scale.



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E-mail: Highways@sandwell.gov.uk

PROJECT
Car Cruising
Signage

LOCATION
Great Bridge Area

DRAWING TITLE
Car Cruising Signage - Great
Bridge

SCALE Not to scale

ISSUED BY S Chadwick

DATE 17th Jan 2023

DRAWN BY Sharon Lang

DRAWING No 40973 S/4

LOCATION PLAN

Dudley Port
Tipton
near to junction with
Sedgley Road East

Location 13
Foamex Car Cruising
sign

SEDGLEY ROAD EAST

DUDLEY PORT

GROVELAND ROAD

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Sandwell Council House
Fleeth Street Oldbury
West Midlands B69 3DE
E-mail: Highways@sandwell.gov.uk

PROJECT
Car Cruising
Signage

LOCATION
Great Bridge Area

DRAWING TITLE
Car Cruising Signage - Great
Bridge

SCALE Not to scale

ISSUED BY S Chadwick

DATE 17th Jan 2023

DRAWN BY Sharon Lang

DRAWING No 40973/1 S/4



LOCATION PLAN

Kenrick Way West Bromwich

Location 15
Foamex Car Cruising
sign

Location 16
Foamex Car Cruising
sign

Location 14
Foamex Car Cruising
sign

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Froeth Street Oldbury
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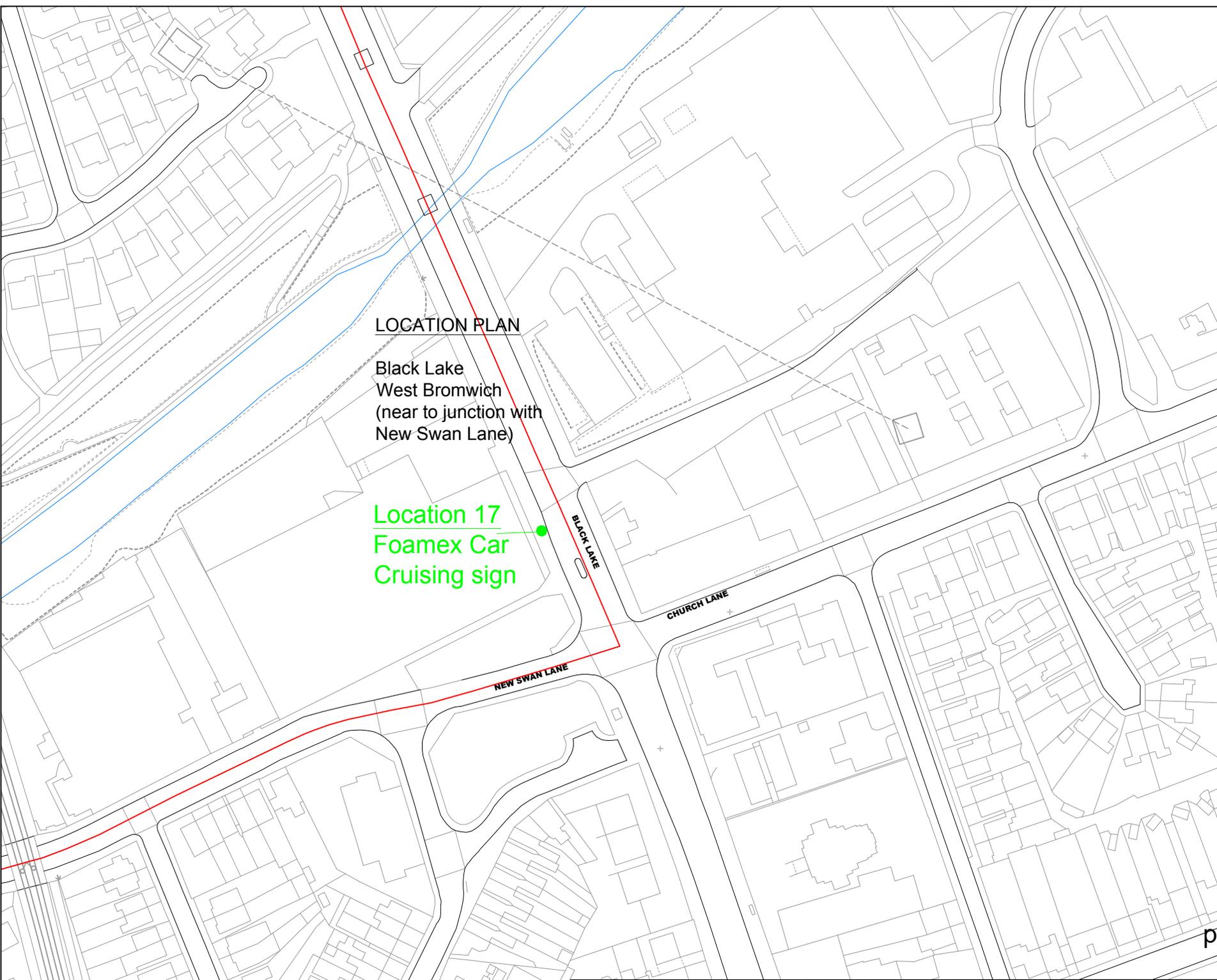
PROJECT
Car Cruising
Signage

LOCATION
Kenrick Way,
West Bromwich

DRAWING TITLE
Car Cruising Signage -
West Bromwich

SCALE	Not to Scale
ISSUED BY	S Chadwick
DATE	2nd Aug 2023
DRAWN BY	Sharon Lang
DRAWING No	41141 S/4

IMPORTANT
The Contractor will be responsible for setting out the work. All dimensions must be obtained from or checked on site. Figured dimensions to be used in preference to scale.



LOCATION PLAN

Black Lake
West Bromwich
(near to junction with
New Swan Lane)

Location 17
Foamex Car
Cruising sign



HIGHWAYS GROUP MANAGER
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Sandwell Council House
Froeth Street Oldbury
West Midlands B69 3DE
E-mail: Highways@sandwell.gov.uk

PROJECT
Car Cruising
Signage

LOCATION
Kenrick Way,
West Bromwich

DRAWING TITLE
Car Cruising Signage -
West Bromwich

SCALE Not to Scale

ISSUED BY S Chadwick

DATE 2nd Aug 2023

DRAWN BY Sharon Lang

DRAWING No 41141/1 S/4

IMPORTANT
The Contractor will be responsible for setting out the work. All dimensions must be obtained from or checked on site. Figured dimensions to be used in preference to scale.

BIRCHLEY ISLAND

LOCATION PLAN

Electricity Distribution Site

Birchley Island
Oldbury
(Area in and around B & M
Car park)



Location 21
Large Metal type
Car Cruising Sign

Location 18
Foamex Car Cruising
sign

Location 19
Foamex Car Cruising
sign

Location 20
Foamex Car Cruising
sign



HIGHWAYS GROUP MANAGER

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Sandwell Council House
Freeth Street Oldbury
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PROJECT
Car Cruising
Signage

LOCATION
Oldbury

DRAWING TITLE
Car Cruising Signage -
Oldbury Area

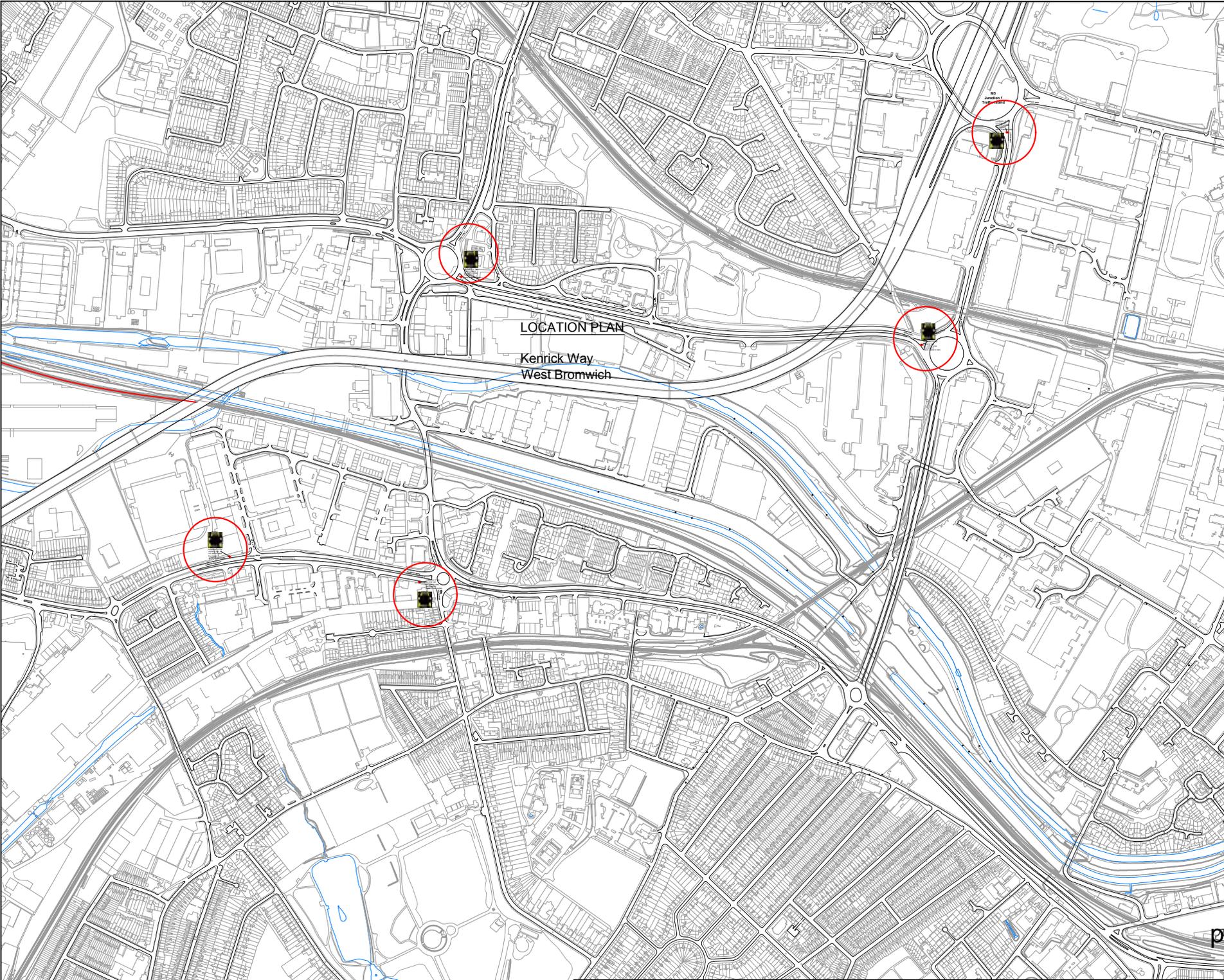
SCALE Not to Scale

ISSUED BY S Chadwick

DATE 17th Jan 2023

DRAWN BY Sharon Lang

DRAWING No 41138 SJ4



IMPORTANT
 The Contractor will be responsible for setting out the work. All dimensions must be obtained from or checked on site. Figured dimensions to be used in preference to scale.



HIGHWAYS GROUP MANAGER
 Robin Weare, BSc, C.Eng, M.I.C.E, MBA.
 Sandwell Council House
 Fresh Street Oldbury
 West Midlands B69 3DE
 E-mail: Highways@sandwell.gov.uk

PROJECT
 Car Cruising Signage

LOCATION
 Kenrick Way,
 West Bromwich

DRAWING TITLE
 Car Cruising Signage -
 West Bromwich

SCALE	Not to Scale
ISSUED BY	S Chadwick
DATE	2nd Aug 2023
DRAWN BY	Sharon Lang
DRAWING No	41141/2 S/4

For: Claimants
Statement of: Mark Wilson
Statement no: 4
Exhibits:
Date: 1st February 2024

**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

FOURTH WITNESS STATEMENT OF MARK WILSON

I, MARK WILSON, Community Safety Officer, will say as follows:-

1. I am employed by Dudley Metropolitan Borough Council as a Community Safety Officer. As the Borough's lead for Anti-Social Behaviour, Car Cruising, Public Space Protection Orders, Prevent and Hate Crime, part of my role is to ensure that Dudley is a safe place to live, work and visit and to work collaboratively across the West Midlands region in respect of community safety issues.
2. I make this statement supplemental to the witness statements which I signed on 25th April 2023, 20th September 2023 and 30th November 2023.
3. 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.
4. This statement is given to update the Court on car cruising activities and the condition of the signage in the Dudley Borough relation to the Injunction and street racing.
5. Since my previous witness statement Manor Way continues to be a hotspot for car cruise activity with regular reports of vehicles gathering at Shell Petrol station and racing along the dual carriageway. There have also been sporadic complaints of cars and motorbikes racing at the Merry Hill Centre.

6. I can confirm that all the signage in the Dudley Borough relating to the Injunction and street racing has recently been inspected by our Transport and Highways team and they report that all are in good condition with no visible damage.
7. A schedule for monthly inspections is now in place with the next inspection of the signage being due to take place on 26th February 2024.
8. Damaged signage can be reported to our call centre, Dudley Council Plus, by telephone on 0300 555 2345 or email at DudleyCouncilPlus@dudley.gov.uk. Any reports will be forwarded to a member of the Transport and Highway Services team who will arrange to inspect and repair/replace the signs where required.
9. I believe that the injunction continues to have a positive effect and it is important that it remains in place and a final order made to ensure the public safety and protect law abiding members of the public and businesses who have suffered for many years from the negative impact of car cruising and street racing. However, as sought the terms of the order demonstrably need widening to include spectators and organisers.
10. I believe the facts stated in this statement to be true. I understand that proceedings for contempt 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.

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

01/02/2024

Print name in full Mark Wilson

Statement of: Steven Gittins
For: Claimants
Statement no: 2
Exhibits: MRC3 - MRC4
Date: 05 February 2024

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY

Claim No. KB-BHM-2022-000188

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 PAUL GALE

6. Miss WIKTORIA SCZCUBLINSKA

7. Mr ISA IQBAL

8. Mr MASON PHELPS

Defendants

SECOND WITNESS STATEMENT OF STEVEN GITTINS

I, STEVEN JOHN GITTINS, Community Safety Manager, Walsall Metropolitan Borough Council, Civic Centre, Darwall Street, Walsall, WS1 1TP (“the Council”) WILL SAY AS FOLLOWS:

1. I make this statement further to those which I have previously made in support of the Black Country boroughs’ application for an injunction prohibiting people from engaging in street racing and car cruising.
2. An injunction was initially granted from 1 February 2014 to 1 February 2018, and subsequently extended until it lapsed on 1 February 2021. A further interim injunction was granted on 22 December 2022 and subsequently extended in February, October and December 2023. I provided evidence in support of both the original and subsequent applications.
3. There have to date been no applications for committals for breaches of the above injunction in the Borough of Walsall.
4. As per my previous statements, although there has been an upturn in activity over the period 23/12/22 – 22/12/23, it continues to be the case overall that problems associated with street racing and car cruising related activity within the borough, remain reduced since the original car cruising injunction and then subsequent injunctions came into effect. This remained the case, even during the 22-month period when the injunction was not in place. This it is believed is at least in part due to the lack public understanding that the injunction was no longer of force and Signage remaining in situ. It is arguable that the continued reduction was due to a legacy effect of the previous order.
5. During the period 23/12/21 – 22/12/22, which is the 12 months prior to the granting of the first interim injunction, the Council’s Community Protection Team received two reports concerning anti-social behaviour relating to “joy riding/motor vehicles”. During the subsequent 12 months, 23/12/22 – 22/12/23 9 reports were received, and between 23/12/23 and 24/1/24 a further 1 report was received. Over the same periods police reported 104, 202 and 9 incidents logs for the borough that contain the word “racing” respectively. This will pick

up a range of vehicle related anti-social behaviour including that related to specifically to Street Racing/Car Cruising. Although it remains the case that there are reports from various locations within the borough, Darlaston, Moxley and Junction 9 of the M6/Black Country Route remain areas of concern.

6. Acting Inspector Upton, the local police lead for this activity, stated that the injunction has been a real deterrent in terms of preventing some of the real risk and issues that street racing brings. He is concerned that if the injunction were no longer in place, we would see a surge in this dangerous activity, particularly along the Black Country Route corridor.
7. A number of residents who have previously provided information in support of the injunction have again been contacted. Two residents in the Hereford Close area of Aldridge stated that the situation had improved but has not gone away, with one stating explicitly that the injunction has worked. Another Aldridge resident, from Leighswood Close, stated that there was still a significant problem, and that he can hear vehicles racing nearby when in bed at night. Local traffic islands are also used as a racetrack with vehicles sometimes driving over, rather than around them. A further resident from Aldridge Road stated that they definitely wanted the injunction to remain in situ, for fear of things getting out of control again. When vehicles do engage in car cruising, they are very loud and drive so fast that they are fearful of reversing off their drive. A nearby business has also frequently had to replace their fence due to damage caused by street racers. An owner of a business on Aldridge Road stated that whilst they do not think the situation had got any worse, they did on occasion see pairs of vehicles racing in the streets. They also felt that much of the behaviour would likely be taking place when the business was closed. Over the Christmas period staff had arrived at work during the morning to find large skid marks on the grassed area in front of their premises.
8. Councillor Paul Bott a Ward Member for Darlaston South, which includes the Moxley area, reported that prior to the original injunction being in place, there was car cruising/street racing activity every weekend on the Black Country Route and surrounding areas, including the car park of a local Aldi. However, since the injunction has been in place the situation has greatly improved and

he no longer receives any complaints. He is fully supportive of the injunction continuing and is concerned about what would happen if a further order were not granted. Once word that an order was no longer in place, he is fearful that this dangerous activity would again increase and that the residents and communities would suffer again as a result. A resident who resides in the Burns Road area of Moxley feels that, although the issues associated with car cruising are nowhere as near as bad as they used to be, they did start to get worse again at the end of 2023 and in early 2024. This time they are not in the area all of the time, appearing periodically for a week and then disappearing, assumingly to another area. When they are in the area it usually from Thursday, through into the weekend and the exhaust noise with “pops and bangs” is very loud.

9. I have recently requested that our Highways Team undertake a further survey of our Car Cruising/Street Racing signage, inclusive of the large fixed and temporary Foamex signs. The audit was undertaken between 19th and 29th January 2024. The audit showed that the large, fixed signs are in order, but that almost all of the smaller Foamex signs were missing. The location of the signs have been plotted by the councils geospatial team and the map is accessible from the Street Racing Web Page on the Council’s web site at <https://mymaps.walsall.gov.uk/streetracingsolo.html> The web page also details the e mail and phone number on which any problems with the signs can be reported via the Council’s Community Protection Team. I now produce and map showing the location of Walsall’s Street Racing signs as exhibit SJG1.

10. The large, fixed signs are at the locations detailed below:

1. A4031 West Bromwich Road Near Greenside Way
2. A454 Little Aston Road/junction of Chester Road
3. A452 Chester Road North
4. A452 Chester Road, Shire Oak Junction
5. A34 Stafford Road, Near Yates Farm
6. A462 Essington Road, near footway link to Kewstoke Close
7. A4124 Lichfield Road, near the footpath to Highmoor Close
8. A461 Bescot Road, near depot M6 Junction 9

9. A41 Black Country New Road, between Southern Way and Bull Lane,
10. A463 Black Country Route (westbound) (near to The Lunt)
11. A463 Black Country Route (eastbound) near to The Lunt)
12. A454 Black Country Route (eastbound) (near to Wellmans Road)
13. A454 Black Country Route (westbound) (near to Marshland Way entry slip road)

The remaining smaller Foamex signs are at locations detailed below.

1. Coppice Road Brownhills Lamppost 3
 2. Coppice Road Brownhills Lamppost 5
 3. Maybrook Road Brownhills Lamppost 13
 4. Black Country New Road, Pedestrian Crossing, Lamppost 19
-
11. In consultation with the police, it has been agreed that temporary signs will be ordered and replaced on the Black Country New Road, Moxley High Street and Moxley Road. Also, in response to concerns raised by residents, temporary signs will also be replaced on Brickyard Road and Northgate Way Aldridge. In total this will number in the region of 15 replacement signs. In order to allow for any further replacements that may be required over time, and to respond to any new emerging hotspots, 50 of the temporary Foamex signs will be ordered. An order is being raised for the replacements signs and highways have confirmed that they will undertake installation which it is anticipated will be completed in late February/early March. Walsall Council's Highways dept will also undertake regular inspections of the signs, inspecting those on A Roads every two months and any others at least every three months. This first inspection will be completed by 1st April 2024 and any issues, or missing signs will be reported to Community Safety for follow up/corrective action.

 12. Although the situation in respect of car cruising/street racing in Walsall has improved since the original injunction was granted, reports of this dangerous anti-social activity and the dangers associated with it are still received, and it

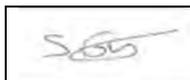
remains a significant concern. This including the potential displacement if Walsall were not included in the injunction, due to its location at the end of the Black Country Route and other arterial road networks. There are clearly still some issues in and around the Aldridge area and in other areas of the borough. Also, it is feared that if Walsall were not included then this dangerous anti-social activity would increase within the borough.

13. Walsall's Community Safety Partnership is planning to adopt a new "Road Harm" reduction priority in its 2024 – 27 Community Safety Strategy. Although this will cover a number of harms associated with anti-social and criminal road/vehicle use, it will include those connected with street racing and demonstrates how seriously the partnership and the borough is treating these issues. The injunction is an important tool, to help to deliver against this priority, and address and reduce the significant risks and danger to the borough's inhabitants resulting from this anti-social activity.
14. It remains my view that the granting of the previous injunctions has had a very beneficial effect in protecting the boroughs inhabitants by reducing the level of anti-social behaviour and significant danger caused by street racing and car cruising activity.

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

05/02/2024

Print name in full STEVEN JOHN GITTINS

Claimant
Steven Gittins
Second Witness
Statement
05 February 2024

**IN THE HIGH COURT OF JUSTICE
CLAIM NO. KB-2022-BHM000188
KINGS BENCH DIVISION**

BETWEEN:

- (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 STEVEN GITTINS

**David Pattison
Director of Governance
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG**

Ref: LIJ017753P/01314155

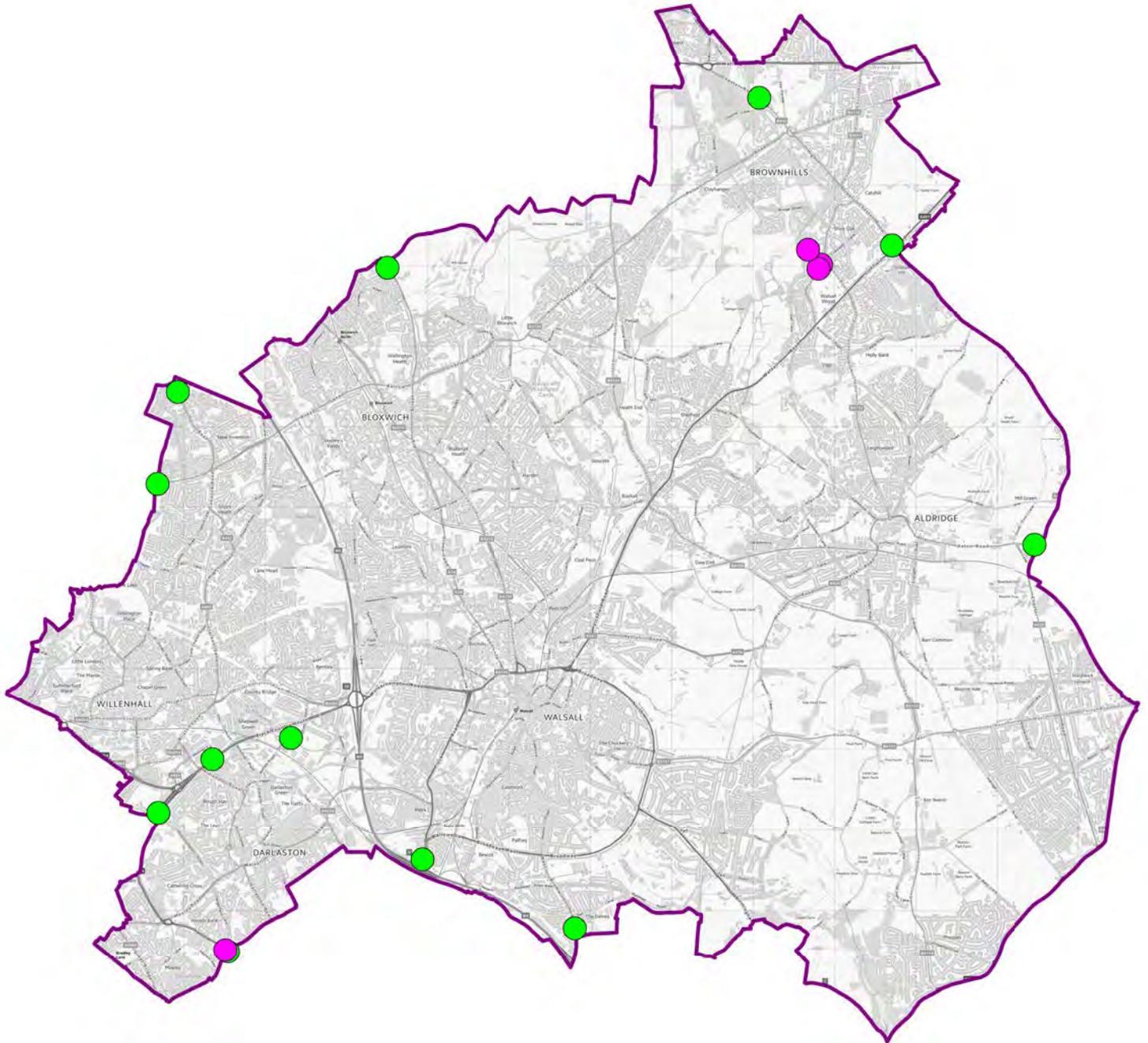
Solicitor for the Council



Walsall Street Racing Signs

● Street Racing Small Foamex Signs

● Street Racing Large Fixed Signs



For: Claimants
Statement of: Pardip Sandhu
Statement no: 6
Exhibits: PS4
Date: 20th February 2024

**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 PARDIP SANDHU

I, Pardip Sandhu, Town Lead Anti-Social Behaviour Officer for Sandwell Metropolitan Borough Council, based in Oldbury, Sandwell, West Midlands, 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 is my sixth statement in this matter.
3. This statement is to confirm that new signage has now been installed in the following areas within Sandwell. These include Birmingham Road, Oldbury on the dual carriageway between the junctions of Rood End Road, and Mallin Street, Smethwick. The sign is double sided and visible to motorists travelling both east and west.
4. The other signs have been installed on Kenrick Way, West Bromwich, at the junction with Trinity Way. The sign is located on the centre refuge and visible to motorists travelling both east and west. The other sign is located on the centre refuge and visible to motorists travelling east towards Smethwick.
5. Another sign is located on the centre refuge and visible to motorists travelling south towards Smethwick. Photographs highlighting these signs are here marked as “**PS4**” which I exhibit to my statement.

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

20/2/2024

Print name in full Pardip Sandhu

**IN THE HIGH COURT OF JUSTICE
CLAIM NO KB-2022-BHM-000188
KING'S BENCH DIVISION**

- (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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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)

EXHIBIT "PS4"

I verify that this exhibit is marked as "PS4" in my statement.

**IN THE HIGH COURT OF JUSTICE
CLAIM NO KB-2022-BHM-000188
KING'S BENCH DIVISION**

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

**WITNESS STATEMENT OF
PARDIP SANDHU**

Location : Birmingham Road, Oldbury

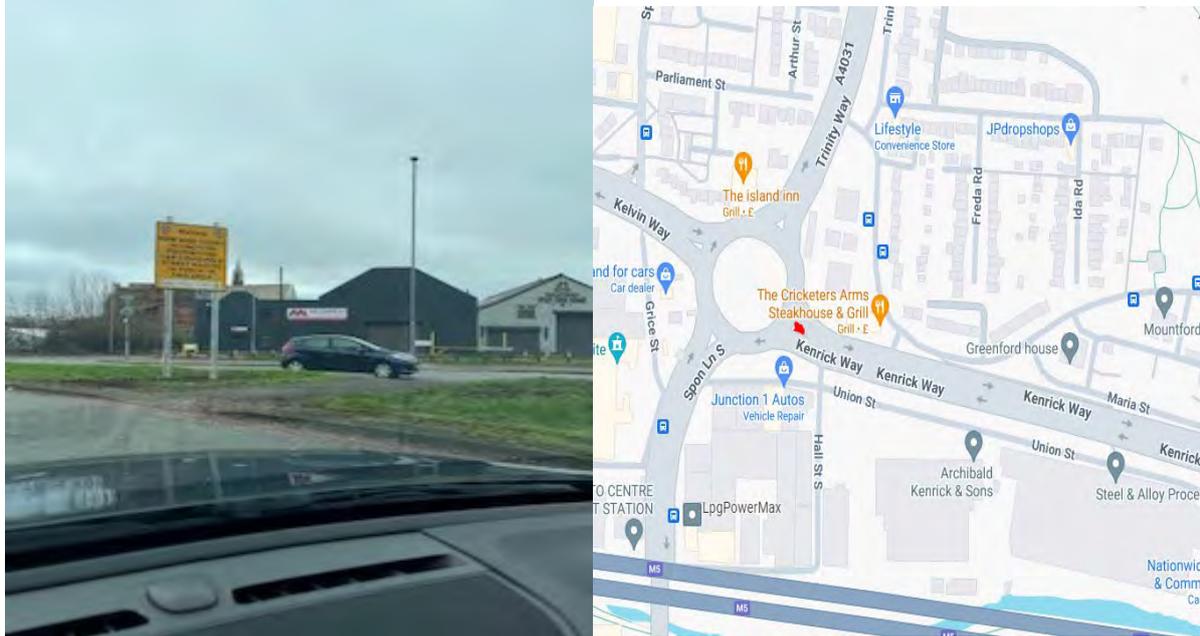
Dual carriageway between the junctions of Rood End Road and Mallin Street, Smethwick.
The sign is double sided and visible to motorists travelling both east and west



Location : Kenrick Way, West Bromwich

Kenrick Way, West Bromwich at the junction with Trinity Way.

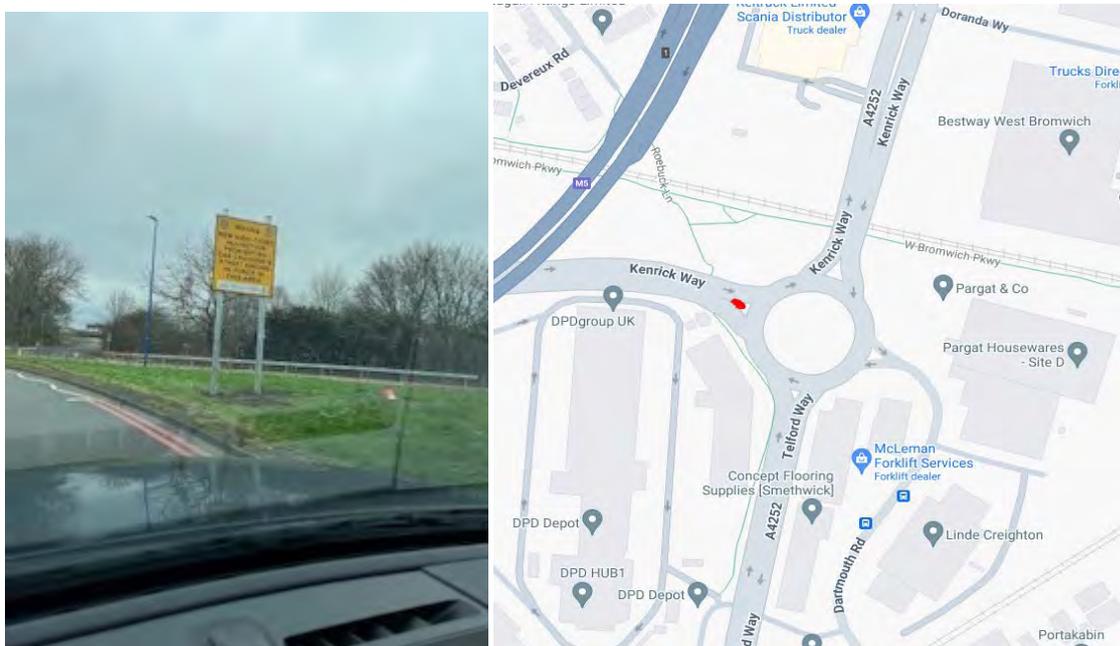
Sign is located on the centre refuge and visible to motorists travelling east towards Smethwick



Location : Kenrick Way, West Bromwich

Kenrick Way, West Bromwich at the junction Telford Way.

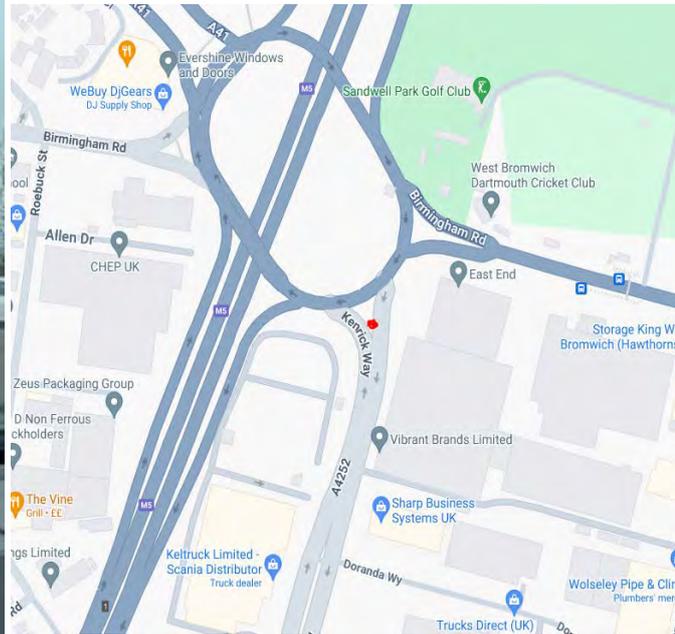
Sign is located on the centre refuge and visible to motorists travelling west towards West Bromwich.



Location : Kenrick Way, West Bromwich

Kenrick Way, West Bromwich at the junction with the M5, Junction 1 motorway island

Sign is located on the centre refuge and visible to motorists travelling south towards Smethwick



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 PB20G

This is the document referred to as "Exhibit PB20G" 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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- (5) Mr ANTHONY GALE
- (6) Miss WIKTORIA SZCZUBLINSKA
- (7) Mr ISA IQBAL
- (8) Mr MASON PHELPS
- (9) Ms REBECCA RICHOLD

Defendants

EXHIBIT PB20G

This is the document referred to as "EXHIBIT PB20G" in the twentieth statement of Paul Brown dated 26 April 2024.

RE: Street racing injunction in Black Country



Paul Brown

To: 'news@warwickshire.police.uk'; 'news@westmercia.police.uk'; 'Press.office@staffordshire.pnn.police.uk'; 'Corporate Communications'

Retention Policy 2 Year Retention Policy (2 years)

Expires 28/02/2026

Reply Reply All Forward

Thu 29/02/2024 09:57

NOT PROTECTIVELY MARKED

Hi all

You may remember that I was in touch last month with a request from the High Court to share our social media posts regarding the street racing injunction in the Black Country.

We have this week secured a full and final injunction which will be in place for at least three years, and again the High Court has again requested that we ask you to share the following posts on your social media channels (if at all possible):

<https://twitter.com/WolvesCouncil/status/176285772248043630>

https://www.facebook.com/WolverhamptonToday/posts/pfbid0VRd3bKTcY2pXPUkskhLHSGXZAzQK6S34RFDWAi9QcNwdYDAZXixHRSmJH13nrfMSI?locale=en_GB

<https://www.instagram.com/p/C35T1biodwq/?hl=en>

If you are able to do this, I would be very grateful.

In addition, if you are able to publish a link to our website on your websites too, that would be brilliant: <https://www.wolverhampton.gov.uk/parking-and-roads/street-racing-injunction-application>.

For information, here is the request in the court order:

- (g) 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 this Order.

If you could let me know what you are able to do, that would be great, so that I can evidence it in my next statement to the court.

Kind regards

Paul Brown
Communications Manager
City of Wolverhampton Council

Email to police forces, 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

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

Defendants

EXHIBIT PB20H

This is the document referred to as "Exhibit PB20H" 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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- (6) Miss WIKTORIA SZCZUBLINSKA
- (7) Mr ISA IQBAL
- (8) Mr MASON PHELPS
- (9) Ms REBECCA RICHOLD

Defendants

EXHIBIT PB20H

This is the document referred to as "EXHIBIT PB20H" in the twentieth statement of Paul Brown dated 26 April 2024.

Adam Sheen

From: Adam Sheen
Sent: 01 March 2024 15:26
To: amanda.jenkins@waldrons.co.uk
Subject: WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC v PERSONS UNKNOWN AND OTHERS - Final Sealed Orders from Hearing 27 February 2024 (Your Client: Mr A Gale)
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

FAO: Ms Amanda Jenkins

Dear Sirs,

WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC v PERSONS UNKNOWN AND OTHERS
Claim no: KB-2022-BHM-000188
Hearing: 27 February 2024 before the Honourable Mr Justice Julian Knowles
Your Client – Mr Anthony Gale (5th Defendant)

I write further to the above hearing at which a final injunction and power of arrest were granted in this matter.

In accordance with the service provisions in the attached orders, by way of service on your Client, please find attached:

1. Final Injunction and Appendices referred to therein (namely, the indices and Plan A);
2. Final Power of Arrest and Plan A referred to therein;
3. Directions Order Accompanying Final Orders made at the hearing (27 February 2024);
4. Amended Claim Form (Version 6);
5. Amended Particulars of Claim; and
6. Order joining Ms Rebecca Richold as a party (9th Defendant).

Thank you for your attention in this matter.

Yours faithfully

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/02092688

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

Adam Sheen

From: Adam Sheen
Sent: 01 March 2024 15:24
To: olivia@charlesstrachan.com; mandy@charlesstrachan.com
Subject: WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC v PERSONS UNKNOWN AND OTHERS - Final Sealed Orders from Hearing 27 February 2024 (Your Client: Miss W Szczublinska)
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

FAO: Ms Olivia Stenton & Ms Mandy Edwards

Dear Sirs,

WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC v PERSONS UNKNOWN AND OTHERS

Claim no: KB-2022-BHM-000188

Hearing: 27 February 2024 before the Honourable Mr Justice Julian Knowles

Your Client – Miss Wiktoria Szczublinska (6th Defendant)

I write further to the above hearing at which a final injunction and power of arrest were granted in this matter.

In accordance with the service requirements in the attached orders, by way of service on your Client, please find attached:

1. Final Injunction and Appendices referred to therein (namely, the indices and Plan A);
2. Final Power of Arrest and Plan A referred to therein;
3. Directions Order Accompanying Final Orders made at the hearing (27 February 2024);
4. Amended Claim Form (Version 6);
5. Amended Particulars of Claim; and
6. Order joining Ms Rebecca Richold as a party (9th Defendant).

Thank you for your attention in this matter.

Yours faithfully

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/02092702

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

Adam Sheen

From: Adam Sheen
Sent: 01 March 2024 15:26
To: elle-may.macey@waldrons.co.uk
Subject: WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC v PERSONS UNKNOWN AND OTHERS - Final Sealed Orders from Hearing 27 February 2024 (Your Client: Mr I Iqbal)

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

FAO: Ms Elle-May Macey

Dear Sirs,

WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC v PERSONS UNKNOWN AND OTHERS

Claim no: KB-2022-BHM-000188

Hearing: 27 February 2024 before the Honourable Mr Justice Knowles

Your Client – Mr Isa Iqbal (7th Defendant)

I write further to the above hearing at which a final injunction and power of arrest were granted in this matter.

In accordance with the service requirements in the attached orders, by way of service on your Client, please find attached:

1. Final Injunction and Appendices referred to therein (namely, the indices and Plan A);
2. Final Power of Arrest and Plan A referred to therein;
3. Directions Order Accompanying Final Orders made at the hearing (27 February 2024);
4. Amended Claim Form (Version 6);
5. Amended Particulars of Claim; and
6. Order joining Ms Rebecca Richold as a party (9th Defendant).

Thank you for your attention in this matter.

Yours faithfully

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

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St Peters Square

Wolverhampton
WV1 1RG

LIJ017753P/02092705

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

Adam Sheen

From: Adam Sheen
Sent: 01 March 2024 15:25
To: masonphelps36@hotmail.co.uk
Subject: WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC v PERSONS UNKNOWN AND OTHERS - Final Sealed Orders from Hearing 27 February 2024 (FAO: Mr M Phelps)

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

Dear Mr Phelps,

WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC v PERSONS UNKNOWN AND OTHERS

Claim no: KB-2022-BHM-000188

Hearing: 27 February 2024 before the Honourable Mr Justice Julian Knowles

FAO: Mr Mason Phelps (8th Defendant)

I write further to the above hearing at which a final injunction and power of arrest were granted in this matter.

In accordance with the service requirements in the attached orders, by way of service, please find attached:

1. Final Injunction and Appendices referred to therein (namely, the indices and Plan A);
2. Final Power of Arrest and Plan A referred to therein;
3. Directions Order Accompanying Final Orders made at the hearing (27 February 2024);
4. Amended Claim Form (Version 6);
5. Amended Particulars of Claim; and
6. Order joining Ms Rebecca Richold as a party (9th Defendant).

Thank you for your attention in this matter.

Yours sincerely

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

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St Peters Square
Wolverhampton
WV1 1RG

LIJ017753P/02092714

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

Adam Sheen

From: Adam Sheen
Sent: 01 March 2024 15:25
To: william.harrington@harringtonslegal.co.uk
Subject: WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC v PERSONS UNKNOWN AND OTHERS - Final Sealed Orders from Hearing 27 February 2024 (Your Client: Miss R Richold)
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

FAO: Mr William Harrington

Dear Sirs,

WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC v PERSONS UNKNOWN AND OTHERS

Claim no: KB-2022-BHM-000188

Hearing: 27 February 2024 before the Honourable Mr Justice Julian Knowles

Your Client – Miss Rebecca Richold (9th Defendant)

I write further to the above hearing at which a final injunction and power of arrest were granted in this matter.

In accordance with the service requirements in the attached orders, by way of service on your Client, please find attached:

1. Final Injunction and Appendices referred to therein (namely, the indices and Plan A);
2. Final Power of Arrest and Plan A referred to therein;
3. Directions Order Accompanying Final Orders made at the hearing (27 February 2024);
4. Amended Claim Form (Version 6);
5. Amended Particulars of Claim; and
6. Order joining Ms Rebecca Richold as a party (9th Defendant).

Thank you for your attention in this matter.

Yours faithfully

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/02092707

Please note: these details do not constitute a digital signature.
Wolverhampton City Council does not accept service of documents by email or fax.
This e-mail is sent by or on behalf of Tracey Christie, Head of Legal Services.

Certificate of service

Name of court THE HIGH COURT OF JUSTICE, KING'S BENCH DIVISION, BIRMINGHAM DISTRICT REGISTRY	Claim No. KB-2022-BHM-000188
Name of Claimant WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC	
Name of Defendant PERSONS UNKNOWN, ANTHONY GALE, WIKTORIA SZCZUBLINSKA, ISA IQBAL, MASON PHELPS & REBECCA RICHOLD	

On what day did you serve?

The date of service is

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

Amended Claim Form (version 6), Amended Particulars of Claim (version 6), Final Injunction Order (27.02.2024) and appendices referred to therein (indices and Plan A), Final Power of Arrest (27.02.2024) and appendix referred to therein (Plan A), Directions Order (27.02.2024) an Order joining Ms R. Richold as party to the injunction (9th Defendant)

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Ms Amanda Jenkins – Solicitor for Mr Gale (5th Defendant)

How did you serve the documents?

(please tick the appropriate box)

- by first class post or other service which provides for delivery on the next business day
- by delivering to or leaving at a permitted place
- by personally handing it to or leaving it with (.....) time left, where document is other than a claim form) (please specify)
- by other means permitted by the court (please specify)
- by Document Exchange
- by fax machine (.....) time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)
- by other electronic means (15.26 hours 01 March 2024) (Please specify time sent, where document is other than a claim form)

e-mail sent to: amanda.jenkins@waldrons.co.uk at 15.26 hours

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

e-mail sent to: amanda.jenkins@waldrons.co.uk

Being the claimant's defendant's
 solicitor's litigation friend

- usual residence
- last known residence
- place of business
- principal place of business
- last known place of business
- last known principal place of business
- principal office of the partnership
- principal office of the corporation
- principal office of the company
- place of business of the partnership/company/corporation within the jurisdiction with a connection to claim
- other (please specify)

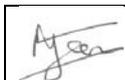
Specified business e-mail address (as given at the hearing on 3 October 2023 where the Court ordered the 5th Defendant be joined as a party to the injunction and injunction application).

I believe that the facts stated in this certificate 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.

Full name

Signed



Claimants' Solicitor

Position or office held

(If signing on behalf of firm or company)

Date

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
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In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Certificate of service

Name of court THE HIGH COURT OF JUSTICE, KING'S BENCH DIVISION, BIRMINGHAM DISTRICT REGISTRY	Claim No. KB-2022-BHM-000188
Name of Claimant WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC	
Name of Defendant PERSONS UNKNOWN, ANTHONY GALE, WIKTORIA SZCZUBLINSKA, ISA IQBAL, MASON PHELPS & REBECCA RICHOLD	

On what day did you serve?

The date of service is

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

Amended Claim Form (version 6), Amended Particulars of Claim (version 6), Final Injunction Order (27.02.2024) and appendices referred to therein (indices and Plan A), Final Power of Arrest (27.02.2024) and appendix referred to therein (Plan A), Directions Order (27.02.2024) an Order joining Ms R. Richold as party to the injunction (9th Defendant)

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Ms Olivia Stenton and Ms Mandy Edwards – Solicitors and legal representatives for Miss Wiktorja Szczublińska (6th Defendant)

How did you serve the documents?

(please tick the appropriate box)

- by first class post or other service which provides for delivery on the next business day
- by delivering to or leaving at a permitted place
- by personally handing it to or leaving it with (.....) time left, where document is other than a claim form) (please specify)

- by other means permitted by the court (please specify)

- by Document Exchange
- by fax machine (.....) time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)

- by other electronic means (15.24 hours 01 March 2024) (Please specify time sent, where document is other than a claim form)

e-mail to: olivia@charlesstrachan.com at 15.24 hours
mandy@charlesstrachan.com at 15.24 hours

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

e-mail sent to: olivia@charlesstrachan.com and mandy@charlesstrachan.com

- Being the
- | | | | |
|-------------------------------------|-------------|-------------------------------------|-------------------|
| <input type="checkbox"/> | claimant's | <input checked="" type="checkbox"/> | defendant's |
| <input checked="" type="checkbox"/> | solicitor's | <input type="checkbox"/> | litigation friend |

- usual residence
- last known residence
- place of business
- principal place of business
- last known place of business
- last known principal place of business
- principal office of the partnership
- principal office of the corporation
- principal office of the company
- place of business of the partnership/company/corporation within the jurisdiction with a connection to claim
- other (please specify)

Specified business e-mail address (as given at the hearing on 3 October 2023 where the Court ordered the 6th Defendant be joined as a party to the injunction and injunction application).

I believe that the facts stated in this certificate 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.

Full name

Signed
Claimants' Solicitor

Position or office held
(If signing on behalf of firm or company)

Date

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Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

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Certificate of service

Name of court THE HIGH COURT OF JUSTICE, KING'S BENCH DIVISION, BIRMINGHAM DISTRICT REGISTRY	Claim No. KB-2022-BHM-000188
Name of Claimant WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC	
Name of Defendant PERSONS UNKNOWN, ANTHONY GALE, WIKTORIA SZCZUBLINSKA, ISA IQBAL, MASON PHELPS & REBECCA RICHOLD	

On what day did you serve?

The date of service is

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Please attach copies of the documents you have not already filed with the court.

Amended Claim Form (version 6), Amended Particulars of Claim (version 6), Final Injunction Order (27.02.2024) and appendices referred to therein (indices and Plan A), Final Power of Arrest (27.02.2024) and appendix referred to therein (Plan A), Directions Order (27.02.2024) an Order joining Ms R. Richold as party to the injunction (9th Defendant)

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Ms Elle-May Macey – Solicitor for Mr Isa Iqbal (7th Defendant)

How did you serve the documents?

(please tick the appropriate box)

- by first class post or other service which provides for delivery on the next business day
- by delivering to or leaving at a permitted place
- by personally handing it to or leaving it with (.....) time left, where document is other than a claim form) (please specify)

- by other means permitted by the court (please specify)

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- by fax machine (.....) time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)
- by other electronic means (15.26 hours 01 March 2024) (Please specify time sent, where document is other than a claim form)

e-mail sent to: elle.may.macey@waldrons.co.uk at 15.26 hours

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

e-mail sent to: elle.may.macey@waldrons.co.uk

- Being the
- | | | | |
|-------------------------------------|-------------|-------------------------------------|-------------------|
| <input type="checkbox"/> | claimant's | <input checked="" type="checkbox"/> | defendant's |
| <input checked="" type="checkbox"/> | solicitor's | <input type="checkbox"/> | litigation friend |

- usual residence
- last known residence
- place of business
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- last known place of business
- last known principal place of business
- principal office of the partnership
- principal office of the corporation
- principal office of the company
- place of business of the partnership/company/corporation within the jurisdiction with a connection to claim
- other (please specify)

Specified business e-mail address (as given at the hearing on 1 November 2023 where the Court ordered the 7th Defendant be joined as a party to the injunction and injunction application).

I believe that the facts stated in this certificate 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.

Full name

Signed
Claimants' Solicitor

Position or office held
(If signing on behalf of firm or company)

Date

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Certificate of service

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Name of Claimant WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC	
Name of Defendant PERSONS UNKNOWN, ANTHONY GALE, WIKTORIA SZCZUBLINSKA, ISA IQBAL, MASON PHELPS & REBECCA RICHOLD	

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Please attach copies of the documents you have not already filed with the court.

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On whom did you serve?

(If appropriate include their position e.g. partner, director).

Mr William Harrington - Solicitor for Ms Rebecca Richold (9th Defendant)

How did you serve the documents?

(please tick the appropriate box)

- by first class post or other service which provides for delivery on the next business day
- by delivering to or leaving at a permitted place
- by personally handing it to or leaving it with (.....) time left, where document is other than a claim form) (please specify)
- by other means permitted by the court (please specify)
- by Document Exchange
- by fax machine (.....) time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)
- by other electronic means (15.25 hours 01 March 2024) (Please specify time sent, where document is other than a claim form)

e-mail sent to: william.harrington@harringtonslegal.co.uk at 15.25 hours

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

e-mail sent to: william.harrington@harringtonslegal.co.uk

Being the claimant's defendant's
 solicitor's litigation friend

- usual residence
- last known residence
- place of business
- principal place of business
- last known place of business
- last known principal place of business
- principal office of the partnership
- principal office of the corporation
- principal office of the company
- place of business of the partnership/company/corporation within the jurisdiction with a connection to claim
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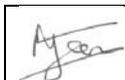
E-mail address (as cited at the hearing on 27 February 2024 as the address for service on the Defendant – being the hearing at which the Court ordered the 9th Defendant be joined as a party to the injunction and injunction application).

I believe that the facts stated in this certificate 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.

Full name

Signed



Claimants' Solicitor

Position or office held

(If signing on behalf of firm or company)

Date

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Certificate of service

Name of court THE HIGH COURT OF JUSTICE, KING'S BENCH DIVISION, BIRMINGHAM DISTRICT REGISTRY	Claim No. KB-2022-BHM-000188
Name of Claimant WOLVERHAMPTON CITY COUNCIL, DUDLEY MBC, SANDWELL MBC & WALSALL MBC	
Name of Defendant PERSONS UNKNOWN, ANTHONY GALE, WIKTORIA SZCZUBLINSKA, ISA IQBAL, MASON PHELPS & REBECCA RICHOLD	

On what day did you serve?

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Please attach copies of the documents you have not already filed with the court.

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On whom did you serve?
(If appropriate include their position e.g. partner, director).

Mr Mason Phelps (8th Defendant) to his personal e-mail address.

How did you serve the documents?
(please tick the appropriate box)

- by first class post or other service which provides for delivery on the next business day
- by delivering to or leaving at a permitted place
- by personally handing it to or leaving it with (.....) time left, where document is other than a claim form) *(please specify)*
- by other means permitted by the court *(please specify)*
- by Document Exchange
- by fax machine (.....) time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*
- by other electronic means (15.25 hours 01 March 2024) *(Please specify time sent, where document is other than a claim form)*

e-mail sent to: masonphelps36@hotmail.co.uk at 15.25 hours

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

e-mail sent to: masonphelps36@hotmail.co.uk

Being the claimant's defendant's
 solicitor's litigation friend

- usual residence
- last known residence
- place of business
- principal place of business
- last known place of business
- last known principal place of business
- principal office of the partnership
- principal office of the corporation
- principal office of the company
- place of business of the partnership/company/corporation within the jurisdiction with a connection to claim
- other *(please specify)*

Specified personal e-mail address (as given at the hearing on 29 January 2024 as the address for service on the Defendant where the Court ordered the 8th Defendant be joined as a party to the injunction and injunction application).

I believe that the facts stated in this certificate 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.

Full name

Signed
Claimants' Solicitor

Position or office held
(If signing on behalf of firm or company)

Date

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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 PB20I

This is the document referred to as "Exhibit PB20I" 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 PB20I

This is the document referred to as "EXHIBIT PB20I" in the twentieth statement of Paul Brown dated 26 April 2024.



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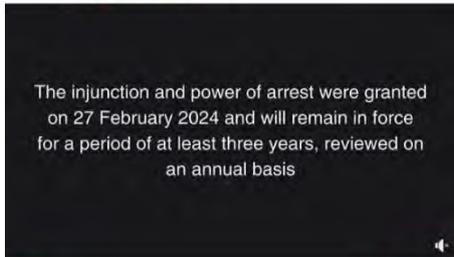


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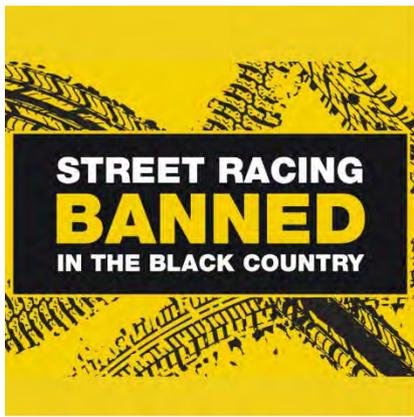
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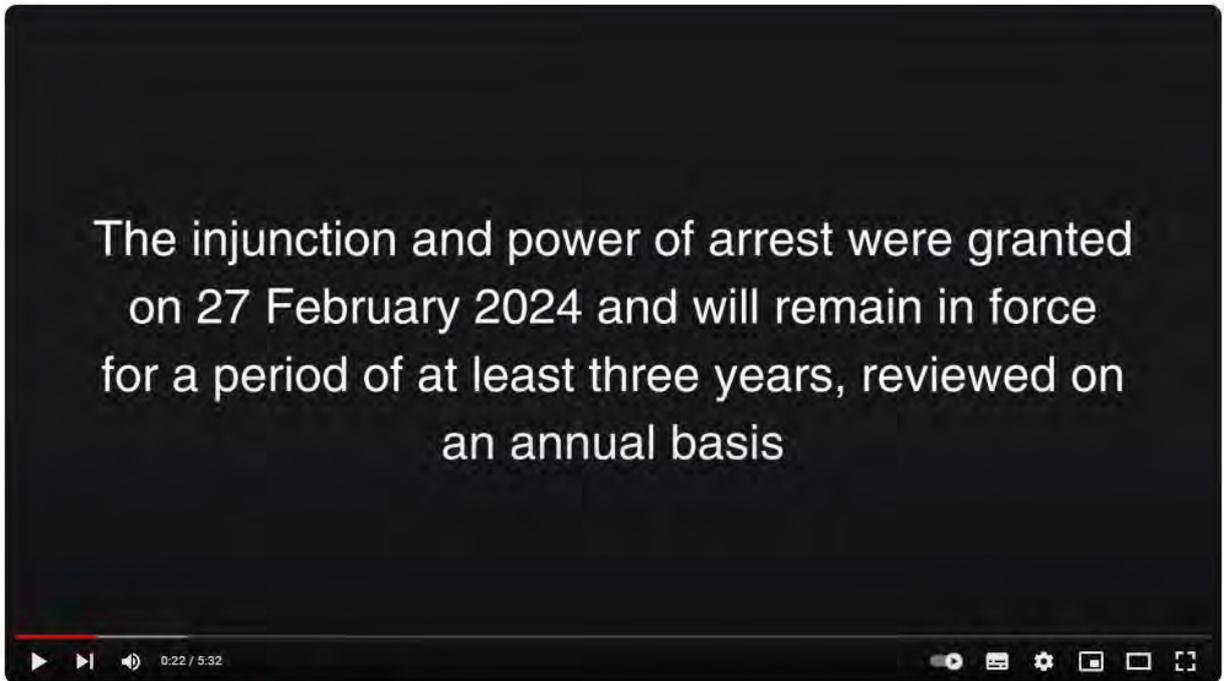


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Full details of the injunction, including evidence presented to the High Court, the Sealed Order, power of arrest and other supporting documentation such as a map showing the Black Country area, can be found on the street racing pages of the four claimants, including wolverhampton.gov.uk/streetracing.

4:36 / 5:32

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To contact the claimants, write to:
**FAO: Black Country Car Cruise,
Legal Services, City of Wolverhampton Council,
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Wolverhampton WV1 1RG.**

Alternatively, email
litigation@wolverhampton.gov.uk
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