i) Statement: Paul Brown
ii) Statement no: 27
iii) For: Claimants
iv) Dated: 02.04.2026
v) Exhibits: PB27A

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

Claim no: KB-2022-BHM-000188

In the matter of an application for an injunction under s.222 Local Government Act 1972 and s.130 Highways Act 1980

B E T W E E N:

1. WOLVERHAMPTON CITY COUNCIL

3. SANDWELL METROPOLITAN BOROUGH COUNCIL

4. WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

- and-

Persons Participating in Street Cruises

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE 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

Persons Attending or Intending to Participate in Street Cruises

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE AREA SHOWN ON PLAN B (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

Persons Promoting Street Cruises

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 AREA SHOWN ON PLAN B (ATTACHED)

Drivers, Riders or Passengers in or on Motor Vehicles who take part in Street Cruises

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 AREA SHOWN ON PLAN B (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

5. onwards AND THOSE PERSONS LISTED AT SCHEDULE 1 AS NAMED DEFENDANTS

Defendants

TWENTY SEVENTH WITNESS STATEMENT OF PAUL STEVEN BROWN

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

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief. This is my 27th statement in these proceedings.

2. The City of Wolverhampton Council is the authority which is leading the joint application of the Councils of Wolverhampton, Sandwell and Walsall seeking

injunctive relief to restrain street racing (also referred to as car cruising) in the three boroughs. This is a statement on behalf of all three Claimants.

3. I have been employed since 25 June 2007 as a Senior Communications Adviser and latterly Communications Manager in the communications team of the City of Wolverhampton Council.

4. In collaboration with my colleagues Pardip Nagra (ASB Team Leader) and Adam Sheen (Senior Solicitor and Acting Lead Lawyer, Litigation Team, Legal Services) a communications plan has been developed, initially to raise awareness of the application to the High Court for a street racing injunction for Wolverhampton, Sandwell and Walsall and, after it was granted, to promote the existence of the injunction and the Power of Arrest which is in place.

5. Recognising this is a joint enterprise, I have been liaising closely with my counterparts in the communications teams of Sandwell and Walsall Councils and West Midlands Police.

6. Schedule 2 of the High Court order made by HHJ Kelly on 26 February, 2026, required the Claimants to complete a series of steps before 23:59 on 20 March 2026 to publicise the outcome of the hearing and bring it to the attention of “Persons Unknown”.

7. The order of 26 February 2026 required:

   Issuing a media release concerning the continuance of the quasi-final injunction, as revised, and power of arrest, which provides:

   (a) a summary of the effect of the revised injunction, power of arrest and the discontinuance of the Second Claimant's claim;
   (b) the addresses of the dedicated webpages maintained by the Claimants regarding street cruising;
   (c) the Claimants’ contact details as set out above; and
   (d) details of where and how copies of the revised quasi-final injunction, power of arrest, this order and the claim documents may be obtained.

   Such release shall be made to, but is not limited to, local print publications including the Express and Star, Chronicle Week, the Birmingham Mail, Halesowen & Dudley News and Stourbridge News; local radio stations including BBC WM, Free Radio, Signal 107, WCR FM and Heart; the website Birmingham Live (aka BLive); and the following television stations, BBC (to include the Midlands Today programme) and ITV Central by 23:59 on 20 March

2026.

I can confirm that a media release was issued to the above outlets on 2 March 2026. Please see pages 2-3 of **EXHIBIT PB27A attached hereto.**

The media release attracted significant coverage, being featured by BBC News, BBC WM, Express & Star, Midlands Today, Rayo and other outlets. Please see selected examples on page 4 of **EXHIBIT PB27A attached hereto.**

The news release was also carried by the three Claimant Councils on their respective websites. Please see page 5 of **EXHIBIT PB27A attached hereto.**

8. The order of 26 February 2026 also required:

   Placing on the Claimants' social media including X, Facebook and Instagram links to the above media release by 23:59 on 20 March 2026.

   I can confirm that the information was posted on the social media accounts of the three Claimant Councils as required on 3 March 2026. Please see pages 6-8 of **EXHIBIT PB27A attached hereto.**

9. The order of 26 February 2026 also required:

   Updating the dedicated pages on the websites of First, Third and Fourth Claimants about the revised quasi-final injunction and power of arrest and this Order to include explicit reference to the discontinuance of the claim by the Second Claimant. Such pages shall carry a direct link to this Order.

   https://www.wolverhampton.gov.uk/street-racing-injunction
   https://www.sandwell.gov.uk/info/200284/roads_travel_and_parking/3231/street_racing
   https://go.walsall.gov.uk/black_country_car_cruising_injunction

   Such steps to be undertaken by 23:59 on 20 March 2026.

   I can confirm that the webpages have been updated accordingly as per a review on 18 March 2026 and carry all the required information. Please see pages 9-10 of **EXHIBIT PB27A attached hereto.**

10. The order of 26 February 2026 also required:

Ensuring that the home (or landing) page of each of the First, Third and Fourth Claimants' main websites have and retain a prominent direct link to the dedicated webpages referred to above by 23:59 on 20 March 2026.

I can confirm that the homepages do retain a prominent direct link to the dedicated street racing webpages, as confirmed by a visual inspection of the City of Wolverhampton Council homepage, the Walsall Council homepage, and the Sandwell Council homepage on 3 March 2026.

11. The order of 26 February 2026 also required:

Updating the dedicated pages on the website of the Second Claimant to confirm that the Second Claimant is no longer a Claimant in these proceedings and the revised quasi-final injunction and power of arrest do not apply in the Dudley local authority area. Such page shall carry a direct link to this Order

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

Such step to be undertaken by 23:59 on 20 March 2026.

I can confirm that a request was made to Dudley Council for this to be actioned on 3 March 2026, with confirmation received from Solicitor/Barrister Levi Sunner on 5 March, 2026, that it had been completed. Please see page 11 of **EXHIBIT PB27A attached hereto**.

12. The order of 26 February 2026 also required:

Checking that the existing street-cruise road signs within the First, Third and Fourth Claimant's local government areas remain in position and in good order informing people of:

(a) the revised quasi-final injunction and power of arrest, and
(b) the area in which they have effect, and
(c) how they can find out more information about this claim and obtain copies of the Claimants' application and supporting documents. Such checks must be carried out by 23:59 on 20 March 2026. The Claimants must thereafter maintain the said existing road signs in good order.

I can confirm that the signage remains in place and that the Dudley logos had been covered up on Wolverhampton signage by 17 March 2026, on Sandwell

signage by 18 March 2026 and Walsall signage by 27 March 2026. Please see page 11 of **EXHIBIT PB27A attached hereto.**

13. The order of 26 February 2026 also required:

    Ensuring that copies of this Order, the revised quasi-final injunction and power of arrest are available at the front desks of the First, Third and Fourth Claimants' main offices by 23:59 on 20 March 2026.

    I received email confirmation that the above had been completed by the City of Wolverhampton Council on 4 March 2026, by Sandwell Council on 4 March 2026 and by Walsall Council on 19 March, 2026.

14. Finally, the order of 26 February 2026 also required:

    Requesting that West Midlands Police post on their website and Instagram, X, and Facebook accounts, a link to the media release referred to at (1) above, such requests to be made by 23:59 on 20 March 2026.

    I can confirm that this request was made on 3 March 2026, and that West Midlands Police shared the City of Wolverhampton Council's Facebook post on the Facebook accounts of Wolverhampton Police, Sandwell Police and Walsall Police, and shared the City of Wolverhampton Council's Instagram post on the West Midlands Police Instagram account. Please see pages 12-13 of **EXHIBIT PB27A attached hereto**.

15. The court will also wish to know that Service on Named Defendants was completed via email on 3 March 2026. Please see page 14 of **EXHIBIT PB27A attached hereto**.

16. The court may also wish to note that, further to paragraph 4 of the substantive case management order dated 27 February 2026, Dudley Council filed and served on the City of Wolverhampton Council its notice of discontinuance on 4 March 2026. Please see page 14 of **EXHIBIT PB27A attached hereto**.

17. The court may wish to note by Paragraph 5 of the substantive case management order dated 27 February 2026, by 4.00pm on 27 March 2026 Dudley Council was required to “remove all road signage installed in its local authority area, pursuant to paragraph 5(f) of the order of the Honourable Mr Justice Julian Knowles made on 27th February 2024, indicating that a High Court Injunction is in force [in the Dudley Metropolitan Borough Council area].”

18. By e-mail of 25 March 2026 at 12.53 hours colleagues within Dudley Metropolitan Borough Council Legal Services confirmed that all road signs within the Dudley Metropolitan Borough Council area referring to the Injunction had been removed. Please see page 15 of **EXHIBIT PB27A attached hereto.**

19. Based on the above I would humbly submit that the Claimants have fully complied with the requirements of the order of the High Court made by HHJ Kelly on 26 February 2026.

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

STATEMENT OF TRUTH

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

Full name:	PAUL STEVEN BROWN
Position:	COMMUNICATIONS MANAGER
Name of Claimant:	City of Wolverhampton Council
Signed:	Paul Brown
Print Name:	PAUL BROWN
Dated:	2 April 2026