

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 3:00 P.M. AND 7:00 A.M. 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 3:00 P.M. AND 7:00 A.M. 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 3:00 P.M. AND 7:00 A.M. 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)

Respondents

BUNDLE OF EVIDENCE IN SUPPORT OF APPLICATION FOR AN INJUNCTION

Urgent Application For Interim Relief

- | | | |
|----|---|------------|
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|----|---|------------|

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| 2. | WCC & Others v Persons Unknown PARTICULARS OF CLAIM (CPR Part 8)
7 October 2022 | A 5 - A 17 |
| 3. | Map of Black Country Area | A 18 |
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of case) | A 21 - A 26 |
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| 7. | WCC & Others v Persons Unknown - Draft INJUNCTION order | A 28 - A 40 |
| 8. | Map of Black Country Area | A 41 |
| 9. | WCC & Others v Persons Unknown - Draft POWER OF ARREST | A 42 - A 44 |
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| 11. | Form N244 Application Notice Alternative Service 7 October 2022 | A 46 - A 50 |
| 12. | WCC & Others v Persons Unknown - Draft ORDER Permitting
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I. SECTION I - Supplemental Evidence Bundle as filed 14 December 2022

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J. SECTION J - COURT ORDERS

1.	INJUNCTION (Granted 22.12.2022)	J 1 - J 24
2.	POWER OF ARREST (Granted 22.12.2022)	J 25 - J 27
3.	PLAN A Map of the Black Country Councils Areas	J 28
4.	KB 2022 BHM 000221 - Birmingham City Council v Nagmadin Ors; KB 2022 BHM 000188 Wolverhampton City Council & Ors v Persons Unknown (21.12.22) - Approved judgment	J 29 - J 46

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32.	Receipt Filing Paul Brown Witness Statement 27 01 23 and Exhibit Bundle (split into two parts due to file size) 27 01 23.pdf	K 139

Urgent Application For Interim Relief

N244

Application notice

For help in completing this form please read the notes for guidance form N244 Notes.

Find out how HM Courts and Tribunals Service uses personal information you give them

when you fill in a form:

<https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION BIRMINGHAM DISTRICT REGISTRY		Claim no. KB-2022-BHM-000188										
Fee account no. (if applicable)		Help with Fees - Ref. no. (if applicable)										
PBA0082797		<table border="1"> <tr> <td>H</td> <td>W</td> <td>F</td> <td>-</td> <td></td> <td></td> <td>-</td> <td></td> <td></td> </tr> </table>		H	W	F	-			-		
H	W	F	-			-						
Warrant no. (if applicable)												
Claimant's name (including ref.) Wolverhampton City Council, Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council and Walsall Metropolitan Borough Council												
Defendant's name (including ref.) 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)												
Date		12.12.2022										

1. What is your name or, if you are a legal representative, the name of your firm?

Legal Services

2. Are you a ☐ Claimant ☐ Defendant ☒ Legal Representative

☐ Other (please specify)

If you are a legal representative whom do you represent?

Claimant

3. What order are you asking the court to make and why?

The Claimants seek an urgent without notice injunction on the terms set out in the appended draft

4. Have you attached a draft of the order you are applying for? ☒ Yes ☐ No

5. How do you want to have this application dealt with? ☒ at a hearing ☐ without a hearing

6. How long do you think the hearing will last? Is
this time estimate agreed by all parties?

☐ at a remote hearing

Hours Minutes

☐ Yes ☒ No

7. Give details of any fixed trial date or period

Existing Application for directions
listed on 14 December

8. What level of Judge does your hearing need?

High Court Judge/ Section 9 Judge

9. Who should be served with this application?

N/A

9a. Please give the service address, (other than details of
the claimant or defendant) of any party named in
question 9.

10. What information will you be relying on, in support of your application?

☐ the attached witness statement

☒ the statement of case

☒ the evidence set out in the box below

If necessary, please continue on a separate sheet.

The application is exceptionally urgent because there is real risk to the life and well-being of residents in the Claimants' local authority areas

It is not possible to give the Defendants any notice of the application as they are "Persons Unknown" and would only become Defendants once any order is served upon them and they act in breach of it

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

☐ Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

☒ No

Statement of Truth

I understand that proceedings for contempt of court may be brought against a person 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.

☐ I **believe** that the facts stated in section 10 (and any continuation sheets) are true.

☒ **The applicant believes** that the facts stated in section 10 (and any continuation sheets) are true. **I am authorised** by the applicant to sign this statement.

Signature



☐ Applicant

☐ Litigation friend (where applicant is a child or a Protected Party)

☒ Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day

12

Month

12

Year

2022

Full name

David Pattison

Name of applicant's legal representative's firm

Legal Services

If signing on behalf of firm or company give position or office held

Chief Operating Officer and Solicitor to the Council

Applicant's address to which documents should be sent.

Building and street

Civic Centre

Second line of address

St Peter's Square

Town or city

Wolverhampton

County (optional)

Postcode

W	V	1	1	R	G		
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If applicable

Phone number

01902 554926

Fax phone number

DX number

DX: 744350 Wolverhampton 27

Your Ref.

AS/LIJ017753P

Email

adam.sheen@wolverhampton.gov.uk

Claim No. KB-2022-BHM-000188
IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY

B E T W E E N:-

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

Claimants

-and-

PERSONS UNKNOWN

Defendant

SKELETON ARGUMENT ON
BEHALF OF THE CLAIMANTS

Wolverhampton City Council,
Legal Services,
Civic Centre,
St Peter's Square,
Wolverhampton

Ref: LIJ017753P/01201576

Solicitor for the Claimants

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

Claim No. KB-2022-BHM-000188

For Hearing 14 December 2022 at 10.30am

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

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)

Defendants

SKELETON ARGUMENT ON
BEHALF OF THE CLAIMANTS

Preliminary

- 1 This application was listed on 6 December 2022 when the Claimants were not in attendance. The Claimants were unaware of the hearing. It appears as if the relevant notice (which was sent to the correct email address) was caught by a 'spam filter'.
- 2 The solicitor with conduct has already apologised to the court for the failure to attend but the Claimants wish to place their apology on record.
- 3 The application has now, pursuant to an order of HHJ Emma Kelly (sitting as a High Court Judge), been listed to be heard (but not consolidated) with an application raising similar issues: *Birmingham City Council v Persons Unknown* KB-2022-BHM-000221.
- 4 It is understood that Birmingham City Council have now issued a further application seeking urgent interim relief. The Claimants in this matter will do the same for similar reasons. This is addressed below.
- 5 Reliance will be placed on the case of *Barking and Dagenham LBC and others v Persons Unknown and others* [2022] EWCA Civ 13 ('*Barking & Dagenham*'). The Supreme Court have granted permission to appeal and an expedited hearing is listed on 8 and 9 February 2023.

Introduction

- 6 By this application the Claimants seek:
- (1) An order permitting substituted service of the Claim Form and consequential directions; and
 - (2) An urgent interim injunction restraining the conduct complained of.
- 7 An urgent interim injunction did not form part of the initial application but recent events (see below) mean such relief is necessary in the immediate future.

Background

- 8 On 1 December 2014 HHJ Owen QC granted an injunction to restrain car cruising *Wolverhampton & Others v Persons Unknown* [2014] (Claim No A90BM228). That injunction (the Original Injunction) was subsequently renewed by HHJ McKenna on 9 January 2018.
- 9 The Original injunction was in effect from 2 February 2015 until 1 February 2021.
- 10 Although application was made to further extend the order such application was adjourned following the first instance decision of Nicklin J in *Barking & Dagenham*.

- 11 Following the decision of the Court of Appeal in *Barking & Dagenham*, reversing Nicklin J, it is apparent that the legal landscape has altered considerably since 2014 and a fresh application is more appropriate (and likely to accord with the current guidance) than attempting to amend and extend the Original Injunction.
- 12 The Claimants aver that the Original Injunction caused or contributed to a substantial reduction in car cruising in the Black Country and the committal proceedings brought for breach of the Original Injunction served as a deterrent to persons contemplating car cruising.
- 13 The Original Injunction did not eliminate car cruising but did cause a decrease in such activity. Since the order lapsed there has been a marked increase.

The impact of the Original Injunction

The position after 2014

- 14 The injunction which Judge Owen QC granted was successful in that it led to a significant reduction in car cruising, albeit such behaviour was not eliminated. See in particular:
- (1) Witness statement of Pardip Nagra [B12/32-B14/42]
 - (2) Witness statement of PC Campbell [B201/71]

- (3) Witness statement of Pardip Sandhu [C7/6]
- (4) Witness statement of Steve Gittins [C39/3]
- (5) Witness statement of PS Lee Plant [C55-C73]
- (6) Witness statement of Jennifer Bateman [D10/8-D11/14].

The position after expiry of the original injunction

15 Please see:

- (1) Witness statement of Pardip Nagra [B15/43-B18/55; B19/59; &B21/70;]
- (2) Witness statement of PC Campbell [B201/72-73]
- (3) Witness statement of Pardip Sandhu [C8/13]
- (4) Jennifer Bateman at paras 8-11 [D10/8-D11/11]
- (5) Witness statement Steve Gittins [C40/6-C41/10]
- (6) Witness statement of Margaret Clemonson [D3].
- (7) Witness statement of Teja Sikhu [D7]
- (8) Witness statement of Richard Hubbard Harris [E16/4-E17/8]
- (9) Second witness statement of Richard Hubbard Harris [E28/5-E32/12]
- (10) Witness statement of John Slater-Kiernan E53/3-E54/7]

Recent Events

16 On 20 November 2022 a fatal road traffic collision occurred in Oldbury, which is within the Claimants' local authority areas. Two

people were killed. It is the unequivocal evidence of PC Mark Campbell¹ that this was directly linked to illegal street racing and that the deceased were spectators at the event.

Legal Issues

17 There have been a number of developments in the law which need to be addressed since the Original Injunction was granted

- (1) Can the injunction sought be binding on someone who was not a defendant when it was granted?
- (2) How must an injunction against persons unknown identify the persons who are bound by it?
- (3) What conduct can be restrained by such an injunction?

The nature of the injunction being sought in this case

18 Before turning to the legal issues which might stand in the way of this claim, it is right to set out clearly the basis of the claim and the nature of the injunction being sought.

19 This is a claim for *quia timet* relief to prevent future car cruises. Although there have been car cruises in the past, they are relevant only as evidence of the need for an injunction. They are not the cause of action.

¹ Para 5 witness statement, dated 9 December 2022

- 20 The Claimants submit that the evidence establishes that car cruising will happen if not restrained, but the Claimants are unable to identify the persons who are likely to engage in it. For this reason, there cannot be named defendants.
- 21 The injunction, if granted, will define defendants as persons who, in the future, engage in particular activities. Accordingly, not only are there no *named* defendants. There are no defendants currently in existence.
- 22 It follows that in granting the injunction the court will not be finally determining rights between litigants. There will be no *res judicata*.
- 23 The proposed order would be conditional on its terms being brought to the attention of anyone who is to be required to obey it (see below).
- 24 Defendants will come into being only when and if they commit the prohibited acts with knowledge of the order.
- 25 The order sought is therefore provisional:
- (1) It will only take effect against an individual when s/he acts inconsistently with it, is identified and is brought before the court.
 - (2) This new defendant will not thenceforth be a person unknown but will become a named defendant.

- (3) A person who becomes a defendant is entitled to challenge the order and to ask the court to set it aside (see paragraph 17 above).
- (4) Further the order will be widely disseminated and provision has been made for anyone potentially affected to apply to join the proceedings and oppose the order
- 26 The order will contain a provision for its own expiry or renewal. Therefore it will not be a final order, even though there will be no traditional return day and even though it will not be expressed to last only until a future trial.
- 27 For this reason, the court making the order will not be *functus officio*. Its role will not have ceased. On the contrary, it will continue to review the order and will have power at any time to discharge or to extend it. Just as the court has power to grant an injunction to last for ever, so it has power to grant an injunction for a period of time with a provision for extension.
- 28 As to the legal issues identified above.
- 29 In light of the Court of Appeal's detailed review of the law in *Barking & Dagenham* reference will largely be confined to that judgment. Unless stated otherwise para numbers refer to *Barking & Dagenham*.

Can the injunction sought be binding on someone who was not a defendant when it was granted?

30 The answer is well established as “yes”. The principles are most clearly articulated in *South Cambridgeshire District Council v Gammell* [2005] EWCA Civ 1429. In that case an injunction was granted against persons unknown causing caravans to be stationed on a certain plot of land. At the time of the injunction, Ms Gammell was not on the land but she later brought a caravan onto it. The Court of Appeal held that she became a party to the proceedings when she did an act which brought her within the definition of defendant. Thus Ms Gammell “became both a person to whom the injunction was addressed and the defendant when she caused or permitted her caravan to occupy the site.” There was no need to make her a defendant to the proceedings thereafter. She had already become a defendant.

See *Barking & Dagenham* at paras 25-32 & 79-83

31 This is not a protestor case in which a private business seeks to protect its commercial interests. It is a claim by an elected authority discharging its statutory duties. This claim is within the category of claims in which an injunction can be issued against the whole world, as in *Venables* to which the Court of Appeal referred in *Barking & Dagenham* at para 75.

32 The court’s duty is to look at the rights being infringed and ask if a *contra mundum* injunction is necessary to vindicate those rights. The

claimants rely on the familiar principle repeated by Baroness Hale in *Environment Secretary v Meier* [2009] UKSC 11 at [25]:

The underlying principle is ubi ius, ibi remedium: where there is a right, there should be a remedy to fit the right. The fact that “this has never been done before” is no deterrent to the principled development of the remedy to fit the right, provided that there is proper procedural protection for those against whom the remedy may be granted. So the questions are: what is the right to be protected? And what is the appropriate remedy to fit it?

33 The present claimants are not private enterprises seeking to uphold their right to do business for profit, undisturbed by protestors. They are elected public bodies seeking to protect the inhabitants of their area from criminal activity:

(1) Section 222 Local Government Act 1972 provides that a local authority may bring civil proceedings in its own name where it considers it expedient for the protection of the interests of the inhabitants of its area. This entitles the claimants to sue for an injunction to restrain public nuisance, being “a nuisance ... which materially affects the reasonable comfort and convenience of life of a class of Her Majesty’s subjects”, per Romer LJ in *Attorney-General v PYA Quarries Limited* [1957] 2 QB 169 at 184.

(2) Lawton LJ observed in the Court of Appeal in *Stoke-on-Trent Council v B&Q Ltd* [1984] 1 Ch 1 at 23H that it is

in everyone’s interest, and particularly so in urban areas, that a local authority should do what it can within its powers to establish and maintain an ambience of a law-abiding

community; and what should be done for this purpose is for the local authority to decide.

- (3) The claimants also have a duty, under section 130 Highways Act 1980, to assert and protect the rights of the public to the use and enjoyment of the highway. Under section 130(5) that duty is reinforced by the power to institute proceedings.

How must an injunction against persons unknown identify the persons who are bound by it?

- 34 The answer is supplied in *Canada Goose* (see *Barking & Dagenham* at 56). The court was there concerned with protestors, but the principles apply to car cruises:

(1) The “persons unknown” defendants in the claim form are, by definition, people who have not been identified at the time of the commencement of the proceedings. If they are known and have been identified, they must be joined as individual defendants to the proceedings. The “persons unknown” defendants must be people who have not been identified but are capable of being identified and served with the proceedings, if necessary by alternative service such as can reasonably be expected to bring the proceedings to their attention. In principle, such persons include both anonymous defendants who are identifiable at the time the proceedings commence but whose names are unknown and also Newcomers, that is to say people who in the future will join the protest and fall within the description of the “persons unknown”. (2) The “persons unknown” must be defined in the originating process by reference to their conduct which is alleged to be unlawful. ... (4) As in the case of the originating process itself, the defendants subject to the interim injunction must be individually named if known and identified or, if not and described as “persons unknown”, must be capable of being

identified and served with the order, if necessary by alternative service, the method of which must be set out in the order.

- 35 The categories of defendants in this case have been fashioned in accordance with this guidance. That is why the claimants no longer seek an order in identical terms to that in the Original Injunction because that simply described the defendants as “persons unknown” without reference to the activity which would turn them into defendants.

What conduct can be restrained by such an injunction?

- 36 The answer is to be found in the same paragraph in *Canada Goose* referred to above:

(5) The prohibited acts must correspond to the threatened tort. They may include lawful conduct if, and only to the extent that, there is no other proportionate means of protecting the claimant’s rights. (6) The terms of the injunction must be sufficiently clear and precise as to enable persons potentially affected to know what they must not do. The prohibited acts must not, therefore, be described in terms of a legal cause of action, such as trespass or harassment or nuisance. They may be defined by reference to the defendant’s intention if that is strictly necessary to correspond to the threatened tort and done in non-technical language which a defendant is capable of understanding and the intention is capable of proof without undue complexity. It is better practice, however, to formulate the injunction without reference to intention if the prohibited tortious act can be described in ordinary language without doing so. (7) The interim injunction should have clear geographical and temporal limits. It must be time limited because it is an interim and not a final injunction.

37 The injunction as framed in the draft order would prohibit mere participation in the gathering. That is an appropriate order because (i) these events take place at night in places to which the law-abiding public does not usually go (except as users of the highway, passing through); (ii) the court should not show undue consideration for those who gather to encourage anti-social behaviour; (iii) there is no other proportionate means of protecting the rights which the claimants seek to protect. In particular, the evidence establishes that spectators are a major part of the problem in that their presence encourages the drivers and causes very considerable risks to their own and others' safety.

38 The Second prohibition of the proposed injunction is open to the objection that it describes the prohibited activity (partly) in terms of the defendant's subjective state of mind. That objection should not prevail. The reference to the defendant's intention does not cause complexity or difficulties of proof and is necessary to enable the police to intervene without having to wait for someone to commit a dangerous act. It is a feature of car cruises that they can at least be broken up before any harm is done.

Further Legal Issues

- (1) Should urgent interim relief be granted in this case?
- (2) How must the Claim Form (or other application) which claims such an injunction be served?

(3) How must the injunction itself be served?

Should urgent interim injunction be granted in this case?

39 Practice Direction A to CPR 23 provides that Applications may be made without service of the application in six specified cases. The first 2 are particularly relevant.

(1) *where there is exceptional urgency,*

(2) *where the overriding objective is best furthered by doing so,*

40 In light of the evidence contained in the witness statement of PC Mark Campbell (see below) it is clear that there is a substantial risk of death or serious injury in the coming days. It is also clear that such risk is very real.

41 Further for obvious reasons there are, as yet, no defendants to serve the application on. The draft order makes provision for extensive publicity regarding the application and any relief granted. The order would not come into force until steps to publicise the order had taken place.

42 The order sought seeks only to restrain anti-social and criminal conduct. This is not analogous to protestor cases. There is no protected right to break the law and cause nuisance to others. The public at large has an unqualified right to life.

43 The issue of possible fatalities had been raised before:

(1) The Tesco Incident [C3/6].

(2) The Stevenage Collision [B25/82 & B183/15].

44 However, those incidents had either occurred well away from the Claimants' areas (Stevenage) or during the currency of the Original Injunction (Tesco).

45 It is suggested that the most recent incident clearly demonstrates a need for urgent relief.

(1) It took place in Oldbury (part of the Third Claimant's (Sandwell) local authority area.

(2) It was clearly a result of conduct that the Injunction sought seeks to prohibit.

(3) The police are anticipating an upsurge of such Steet cruises in the immediate future. (See witness statement of PC Campbell, dated 9 December 2022 filed in the Birmingham application).

How must the Claim Form (or other application) which claims such an injunction be served?

46 Plainly an anonymous defendant who is identified by description cannot be served in the normal manner. This was addressed in Canada Goose at [82] (see above). Where there are:

"persons unknown" defendants (they) must be people who have not been identified but are capable of being identified and served with the proceedings, if necessary by alternative service such as can reasonably be expected to bring the proceedings to their attention.

47 CPR 6.15 provides *inter alia*:

- (1) *Where it appears to the court that there is a good reason to authorise service by a method or at a place not otherwise permitted by this Part, the court may make an order permitting service by an alternative method or at an alternative place.*
- (2) *On an application under this rule, the court may order that steps already taken to bring the claim form to the attention of the defendant by an alternative method or at an alternative place is good service.*

48 Further CPR 6.16 provides:

- (1) *The court may dispense with service of a claim form in exceptional circumstances.*
- (2) *An application for an order to dispense with service may be made at any time and*
 - (a) *must be supported by evidence; and*
 - (b) *may be made without notice.*

49 CPR 6.27 applies the provisions of Part 6.15 to documents other than a Claim Form.

50 The court is referred to: the witness statements of Paul Brown at [A65-A71; B226-B228; the annexed communication plan [B229-B237]; and the draft order for service by Alternative means [A20-A24].

51 The service provisions in the draft order are based on an order made by Julian Knowles J in the HS2 Litigation². It is suggested that it strikes an appropriate balance between the right of the Claimants and those potentially affected by the application.

Urgent Relief

52 The Claimants' application was originally for a staged process i.e. (1) Issue; (2) Application for alternative service; & (3) on-notice hearing.

53 If urgent relief is granted then the order will need to be modified to authorise alternative service of the without notice Injunction.

54 A draft accompanies the application.

How must the injunction itself be served?

55 Similar considerations to service of the Claim Form arise with regard to service of the injunction. However, the need for a Newcomer to be made aware of the injunction require greater procedural safeguards and publicity.

56 So far as is relevant CPR 81.4 now provides:

²

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1105125/Orders-Basic_Order.pdf

(1) Unless and to the extent that the court directs otherwise, every contempt application must be supported by written evidence given by affidavit or affirmation.

(2) A contempt application must include statements of all the following, unless (in the case of (b) to (g)) wholly inapplicable —

...;

(c) confirmation that any such order was personally served, and the date it was served, unless the court or the parties dispensed with personal service;

(d) if the court dispensed with personal service, the terms and date of the court's order dispensing with personal service;...

57 The Claimants again refer to witness statements of Paul Brown [A65-A71; B226-B228; the annexed communication plan B229-B237].

58 It is envisaged that the injunction should not come into force until the Claimants have complied with those steps provided for in the order.

59 These extensive notice provisions should achieve the joint aims of ensuring that knowledge of the injunction is widely disseminated throughout the claimants' local authority areas and protecting any "Newcomer" from committal proceedings where he has unknowingly breached the order.

Conclusions

60 The claimants submit that in light of the evidence there is good reason to:

- (1) grant an injunction in the terms sought;
- (2) grant such an injunction on an urgent without notice basis;
- (3) permit service by alternative means of the Application(s),
Claim Form and any orders made.

MICHAEL SINGLETON

(Counsel for the Claimants)

IN JUNCTION

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

To:	1. Persons Unknown who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more
-----	---

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

Claim no:

Claimants

WOLVERHAMPTON CITY
COUNCIL & OTHERS

<p>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</p> <p>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</p> <p>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)</p>	<p>Defendants</p> <p>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</p> <p>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</p> <p>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)</p>
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PENAL NOTICE

IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DO NOT COMPLY WITH THIS ORDER, YOU MAY BE HELD IN CONTEMPT OF COURT AND IMPRISONED OR FINED OR YOUR ASSETS MAY BE SEIZED

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask

Page 2 of 15

The court office at the High Court of Justice, Birmingham District Registry, 5th Floor, Priory Courts, 33 Bull Street, Birmingham, B4 6DS (telephone: 0121 681 4441) is open between 10 a.m. to 4 p.m. Mondays to Fridays (excluding public holidays.) When contacting the court please mark any correspondence for the attention of the Court Manager and always quote the Claim number.

the Court to vary or discharge this Order but you must obey the order unless it is varied or discharged by the Court.

A Defendant who is an individual who is ordered not to do something must not do it himself/herself or in any other way. He/she must not do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

This Order was made when the Defendants were not present at court and had not been given notice of the Claimants applications

Before sitting, at the High Court of Justice, Birmingham District Registry, Priory Courts, 33 Bull Street, Birmingham, B4 6DS on

UPON the Claimants' application, by an Application Notice dated ,for an injunction pursuant to section 222 Local Government Act 1972 and section 130 Highways Act 1980 and the Court exercising its discretion to grant injunctive relief pursuant to section 37(1) Senior Courts Act 1981

AND UPON the Court making an Order on making directions and approving service in respect of this interim injunction, the Claim Form, the Claimant's Application and the evidence in support by alternative means pursuant to CPR r. 6.15 and r. 6.27.

And UPON it appearing to the court that there is good reason to authorise service by a method or place not otherwise permitted by CPR Parts 6 & 81

AND UPON the Claimants confirming that this Order is not intended to prohibit lawful motorsport taking place on private land where planning permission has been granted and such activities take place under an approved code or licence from a recognised regulatory body.

AND UPON hearing Counsel for the Claimants and without notice to the Defendants.

IT IS ORDERED THAT:

Injunction in force

1 IT IS FORBIDDEN for the Defendants to 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 IT IS ALSO FORBIDDEN for the Defendants to 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 IT IS ALSO FORBIDDEN for the Defendants to promote organise publicise (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)

Stunts are driving manoeuvres often undertaken at such gatherings including but not limited to:

- (1) “Burnouts” Causing a vehicle to destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed.
 - (2) “Donuts/Donutting” Causing a vehicle to rotate around a fixed point (normally the front axle) while not moving-off causing noise, smoke and tyre marks to be created.
 - (3) “Drifting” Turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input.
 - (4) “Undertaking” passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code
- 4 A Power of Arrest pursuant to section 27 Police and Criminal Justice Act 2006 shall apply to clauses 1 & 2 of this Order.

Definitions

5 In this Order the following definitions have been applied:

- (1) “The Injunction” means this Order
- (2) “The Power of Arrest” means the sealed Power of Arrest
- (3) “the Documents”
 - (a) Notice of Hearing and a sealed copy of this Order
 - (b) Part 8 Claim Form;
 - (c) Particulars of Claim
 - (d) N16A application for an Injunction;
 - (e) Draft Injunction Order
 - (f) Draft Power of Arrest
- (4) “the Evidence” materials set out at Schedule A below
- (5) “the Claimants’ contact details”:

FAO: Black Country Car Cruise

Legal Services
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG
E: litigation@wolverhampton.gov.uk T: 01902 556556
DX: 744350 Wolverhampton 27
Ref: LIT/AS/LIJ017753P

Directions for Service

- 6 Pursuant to CPR r. 6.15 & r. 6.27 the Claimants have permission to serve the Documents and the Evidence on the Defendants by the alternative means set out at paragraphs 7(1) to 7(7) below
- 7 Pursuant to CPR r. 6.27 & r. 81.4 the Claimants have permission to serve the Injunction and Power of Arrest on the Defendants by the alternative means set out at paragraphs 7(1) to 7(7)

below

- (1) Issuing a media release highlighting the application for and granting of the High Court injunction and power of arrest on an urgent without notice basis

Such release must provide:

- (a) Details of the application and summarise the orders granted;
- (b) Any deadline for filing an acknowledgement of service or other documents by the Defendants;
- (c) The date, time and location of any future hearings
- (d) The addresses of the dedicated webpages maintained by the Claimants regarding car cruising;
- (e) The Claimants' contact details;
- (f) Details of where and how copies of the Injunction, Power of Arrest, the Documents and the Evidence may be obtained.

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

- (2) Placing on the Claimants' social media including Twitter and Facebook links to the above media release regarding the granting of the High Court injunction and power of arrest and highlighting introduction of injunction and power of arrest.
- (3) Updating the dedicated pages on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council and Walsall Council about the injunction and power of arrest, and date of introduction of the injunction at the following webpages:

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

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

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

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

Such pages shall carry a direct link to this Injunction Order, the Power of Arrest, the Documents and the Evidence .

- (4) Placing a copy of the Injunction and Power of Arrest in the Express & Star and Chronicle Week newspapers
- (5) Uploading to the video sharing website “You Tube”, a video of someone presenting and reciting a copy of the terms of the Injunction with a stark warning that should people be participate in car cruising in the Black Country they may be in breach of the Injunction and liable to committal proceedings for contempt of court which could result in the court imposing: a sentence of imprisonment; a fine; or an order seizing a person’s assets. The video shall also outline:
 - (a) The deadline for filing an acknowledgement of service or any other documents by any Defendant;
 - (b) The date, time and location of the next hearing of the application;
 - (c) The Claimant's contact details;
 - (d) The addresses of the dedicated webpages maintained by the Claimants regarding car cruising;
 - (e) Details of where and how copies of the Injunction the Power of Arrest ,Documents and the Evidence may be obtained.

Items (c) and (d) shall appear on screen as text.

- (6) Erecting and maintaining official road signs (fixed, temporary and electronic) throughout the Black Country Area in locations that are, or have been, hotspots of car cruising activity stating “HIGH COURT INJUNCTION PROHIBITING CAR CRUISING IN FORCE IN THIS AREA
- (7) Ensuring that copies of the Injunction and Power of Arrest are available at the front desks of the Claimants’ main offices. West Midlands Police will ensure that copies of the Injunction and Power of Arrest are available at the front desks of their stations throughout the Black Country Area.

- 8 The Injunction, Power of Arrest, Documents and Evidence shall be deemed served on the Defendants at 23.59 on the date upon which the final step in paragraph 7 has been complied with.
- 9 The Claimants shall file a witness statement by their proper officer confirming that the steps taken to effect service set out at paragraph 7(1) to 7(7) have been completed, within 14 days of the final step being taken.
- 10 Any person who wishes to appear at the hearing referred to at paragraph 12 below must file and serve on the Claimants an Acknowledgment of Service no later than 4pm on **[please complete]**
- 11 The Claimants' may file any updating evidence by no later than 4pm on **[please complete]**
- 12 The matter shall be listed for hearing before a High Court Judge (s.9 if practicable) with a time estimate of 1 day on **[please complete]**

Commencement, Term and Duration

- 13 The Injunction and Power of Arrest shall come into effect at 00:01 on the day following the completion of the steps in paragraph 7.
- 14 This Order & Power of Arrest shall, expire at 11.59 pm on _____ unless it is extended, varied or discharged by further the court.
- 15 A further hearing will take place as provided by paragraph 12 above to decide whether this

interim order shall continue in force or be varied or discharged.

16 Costs in the case

Further Case Management

17 Without prejudice to the foregoing, any person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Claimants' solicitors immediately (and in any event not less than 48 hours before the hearing of any such application) via the contact details set out below. Schedule B to this Order indicates the process which must be followed for any such application. Useful sources of support and information are listed in Schedule C.

18 Any person applying to vary or discharge this Order must provide their full name and address, an address for service, and must also apply to be joined as a Named Defendant to the proceedings at the same time.

19 The Claimants otherwise have permission to apply to extend or vary this Order or for further directions.

20 Save as provided for above, the Claim be stayed generally with liberty to restore.

Documents in the Claim and Application

- 21 A single hard copy of any document will be sent within 21 days of the receipt of a reasonable request for that document or documents via the Claimants' solicitors whose contact details are set out below so long as any requests include a postal address and the full name of the requestor.

Communications with Claimants and the Court

- 22 All communications to the Court about this Order (which should quote the case number) should be sent to:

Birmingham District Registry Civil Justice Centre
Priory Courts
33 Bull Street

Birmingham B4 6DW

E: qb.birmingham@justice.gov.uk T: 0121 681 4441
F: 01264 785 131
DX: 701987 Birmingham 7

- 23 Any person who wishes to view or download copies of the documents shall contact the Claimants' solicitors via the contact details below

- 24 The Claimants' solicitors and their contact details are:

FAO: Black Country Car Cruise
Legal Services
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG

E: litigation@wolverhampton.gov.uk
T: T: 01902 556556
DX: 744350 Wolverhampton 27
Ref: LIT/AS/LIJ017753P

Dated:

SCHEDULE A

SCHEDULE A

Please see Attached Index to Bundle for Injunction Application (Parts B, C, D, E, F and G).

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 3:00 P.M. AND 7:00 A.M. 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 3:00 P.M. AND 7:00 A.M. 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 3:00 P.M. AND 7:00 A.M. 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)

Respondents

BUNDLE OF EVIDENCE IN SUPPORT OF APPLICATION FOR AN INJUNCTION

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B. SECTION B - Global Overarching Statements

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2.	Overarching Statement of Pardip Nagra (For Wolverhampton) 19 July 2022	B 4 - B 35
3.	EXHIBIT PN1	B 36
4.	Exhibit PN1 - Statement of Lisa Fox (From 2014 Application) 02 11 2013	B 37 - B 40
5.	EXHIBIT PN2	B 41
6.	Exhibit PN2 - Statement of Peter James (From 2014 Application) 09 11 2013	B 42 - B 44
7.	EXHIBIT PN3	B 45
8.	Exhibit PN3 - Statement of Carl Yeomans (From 2014 Application) 07 11 2013	B 46 - B 49
9.	EXHIBIT PN4	B 50
10.	Exhibit PN4 - Statements of David Clark (From 2014 Application) 12 03 2014	B 51 - B 70
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15.	EXHIBIT PN7	B 93
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17.	Exhibit PN7 Statement of Fanella Bird (From 2014 Application) 23 11 2014	B 96
18.	EXHIBIT PN8	B 97
19.	Exhibit PN8 - Statement of PC J Hartford (From 2014 Application) 16 11 2013	B 98 - B 99
20.	EXHIBIT PN9	B 100
21.	Exhibit PN9 - Statement of Richard Hardy (From 2014 Application) 06 11 2013	B 101 - B 103
22.	EXHIBIT PN10	B 104
23.	Exhibit PN10 - Statement of Police Inspector Julie Mason (From 2014 Application) 23 07 2014	B 105 - B 109
24.	EXHIBIT PN11 - (Video Footage Available Separately)	B 110
25.	EXHIBIT PN12	B 111
26.	Exhibit PN12 - E-mail from Lisa Fox 17 April 2021	B 112
27.	EXHIBIT PN13	B 113
28.	Exhibit PN13 - Express & Star Article 12 04 22 direct print from Website	B 114 - B 126
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37.	Exhibit PN17 - Version 1 Print Friendly Version of story published on E & S Website 15 08 2018	B 137 - B 142
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39.	EXHIBIT PN18	B 161
40.	Exhibit PN18 - Essex Live Article 5 April 2021 (Print Friendly Version)	B 162 - B 164
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42.	EXHIBIT PN19	B 171
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44.	Overarching Statement of Chief Superintendent Ian Green (West Midlands Police) 19 07 22	B 174 - B 176
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C. SECTIONC- Overarching Statements of Professionals for Each Claimant Local Authority

1.	Statement of Kathryn Jones 13 07 22 (For Dudley)	C 1 - C 5
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3.	Exhibit Cover - Exhibit PS1 (Pardip Sandhu 27.9.2022)	C 13
4.	Exhibi PS1 To Statement of Pardip Sandhu 2022 car crusing incidents 2021 - 2022 with date of incidents	C 14 - C 36
5.	Exhibit Cover - Exhibit PS2 (Pardip Sandhu 27.9.2022)	C 37
6.	Statement of Steve Gittins 08 09 22 (For Walsall)	C 38 - C 44
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13.	Statement of Police Sergeant Lee Plant 15 07 22 (For Wolverhampton)	C 52 - C 53
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17.	Statement Police Inspector Phil Upton 09 06 22 (For Walsall)	C 91 - C 93
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1.	Witness Statement of Dharminster Dhaliwal (Wolverhampton) Tier 3	D 1 - D 2
2.	Witness Statement of Margaret Clemson (Wolverhampton) Tier 3	D 3 - D 4
3.	Witness Statement of Nicki Wellings (Wolverhampton) Tier 3	D 5
4.	Witness Statement of Taylor Harvey-Beardsmore (Wolverhampton) Tier 3	D 6
5.	Witness Statement of Teja Sidhu (Wolverhampton) Tier 3	D 7
6.	Witness Statement of Teresa Welburn (Wolverhampton) Tier 3	D 8
7.	Witness statement of Jennifer Bateman 26.05.22 (For Wolverhampton)	D 9 - D 12

E. SECTION E- Statements of Councillors, MPs, Residents and Business for Dudley

1.	Signed statement of James Morris MP (For Dudley)	E 1 - E 6
2.	Statement of Stacy Hewerdine - Waterfront Security 10-05-22 (For Dudley)	E 7 - E 12
3.	Exhibit Cover - EXHIBIT SH1 [Stacy Hewedine] (For Dudley) (Clearer Version of Exhibit SH1)	E 13
4.	EXHIBIT SH1 (Waterfront Car Park) [Stacy Hewerdine] (For Dudley) (Clearer Version)	E 14
5.	Signed statement of Richard Hubbard- Harris - Showcase 10-05-22 (For Dudley)	E 15 - E 22
6.	Exhibit Cover RHH1 [Richard Hubbard-Harris] (For Dudley) (Clearer Version of Exhibit RHH1)	E 23
7.	EXHIBIT RHH1 Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 24
8.	EXHIBIT RHH1 Front Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 25
9.	EXHIBIT RHH1 Rear Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 26
10.	Signed 2nd stmt of Richard Hubbard-Harris dated 14-09-22	E 27 - E 33
11.	Exhibit RHH2 - (Video Footage Available Separately)	E 34
12.	Exhibit RHH3 - Cover Sheet	E 35
13.	EXHIBIT RHH3	E 36 - E 40
14.	Exhibit RHH4 - Cover Sheet	E 41
15.	EXHIBIT RHH4	E 42
16.	Exhibit RHH5 - Cover Sheet	E 43
17.	EXHIBIT RHH5	E 44
18.	Exhibit RHH6 - Cover Sheet	E 45
19.	EXHIBIT RHH6	E 46 - E 47

20.	Exhibit RHH7- Cover Sheet	E 48
21.	EXHIBIT RHH7	E 49
22.	Exhibit RHH8 - Cover Sheet	E 50
23.	EXHIBIT RHH8	E 51
24.	Signed statement of John Slater-Kiernan - Shell Garage 11-05-22 (For Dudley)	E 52 - E 56
25.	Exhibit Cover JSK1 [John Slater-Kiernan] (For Dudley)	E 57
26.	Statement of Chris Southall - Tesco 11-05-22 (For Dudley)	E 58 - E 62

F. SECTION F - Statements of Councillors, MPs, Residents and Business for Sandwell

1.	Letter from Nicola Richards MP 25 04 22	F 1
2.	Witness Statement of Donata Halasa (Sandwell) 10 06 22	F 2 - F 3
3.	Witness Statement of John Gallagher (Sandwell) 31 05 22	F 4 - F 5
4.	Witness Statement of Nicki Wellings (Wolverhampton) 11 06 22	F 6
5.	Witness Statement of Ronald Hill (Sandwell) 31 05 22	F 7
6.	Witness Statemet of Sheila Powell (Sandwell) 10 06 22	F 8 - F 9

G. SECTION G - Statements of Councillors, MPs, Residents and Business for Walsall

1.	Witness Statement of Simon Pearson (Walsall) 28 04 22	G 1 - G 2
2.	Witness Statement of Kelly Matthews (Walsall) 28 04 22	G 3 - G 4
3.	Witness Statement of Julia Westwood (Walsall) 13 05 2022	G 5 - G 6
4.	Witness Statement of Lee Roden (Walsall) 21 05 2022	G 7 - G 8
5.	Witness Statement of Robert Norton (Walsall) 22 05 2022	G 9 - G 10
6.	Witness Statement of Ravdeep Khara (Walsall) 24 05 2022	G 11 - G 12

SCHEDULE B – STEPS TO VARY OR DISCHARGE THIS ORDER

If, in accordance with paragraph 18 above, any Defendant or any other person affected by this Order wishes to apply to vary or discharge this Order, to ensure effective case management by the Court the following indicative steps must be followed:

1. Any person seeking to contest the Claimants' entitlement to interim relief should file with the court (i.e. send to the court) and serve (i.e. send to the Claimants):

(a) An N244 application form¹;

(b) Written grounds (which may be contained in within the N244 application form or a separate document) for:

- i. permission to bring the application; and
- ii. the application (i.e. reasons for the proposed variation / discharge of the Order).

(c) A witness statement(s) containing and/or appending all of the evidence to be relied upon in support of the application.

2. In order to file the above documents with the Court, the applicant should:

(a) Send physical copies of the documents to the address at paragraph 22 of this Order; and/or

(b) Speak to the Court to obtain an address to send electronic copies of the documents to.

3. In order to serve the above documents on the Claimants, the applicant should:

(a) Send physical copies of the documents to the address at paragraph 24 of this Order; and/or

(b) Send electronic copies of the documents to the e-mail address at paragraph 24 above.

4. The person making the application should indicate to the Court and Claimants whether they consider the matter requires a court hearing or can be dealt with by the judge reviewing the paper application and any response from the Claimants.

5. Thereafter the Claimants shall have 14 days to file and serve evidence and submissions in response, including as to whether an oral hearing is required to determine the application.

6. Within 21 days, the Court shall decide:

- a whether to grant permission for the application to proceed; and
- b if permission is granted, whether a hearing is necessary, and/or may request from the parties evidence on any further matters necessary to determine the application. If the Court decides that a hearing is necessary, it shall seek to schedule the hearing (accommodating availabilities of the parties) within 42 days (6 weeks).

¹ 1 See the following link which provides a digital version of the form, and guidance notes:
<https://www.gov.uk/government/publications/form-n244-application-notice>

7. If the Court decides that further evidence is needed from any party, it may set strict deadlines by which that evidence must be filed. Both parties should be aware that the Court may restrict the use of evidence which is filed late or impose other penalties for non-compliance.

SCHEDULE C – USEFUL REFERENCES AND RESOURCES

The attention of all parties is drawn to the following references and resources:

Bar Pro Bono Unit – A possible avenue for obtaining free legal advice and/or representation:

<https://weareadvocate.org.uk/>

Support Through Court (formerly Personal Support Unit) – An organisation supporting litigants in person:

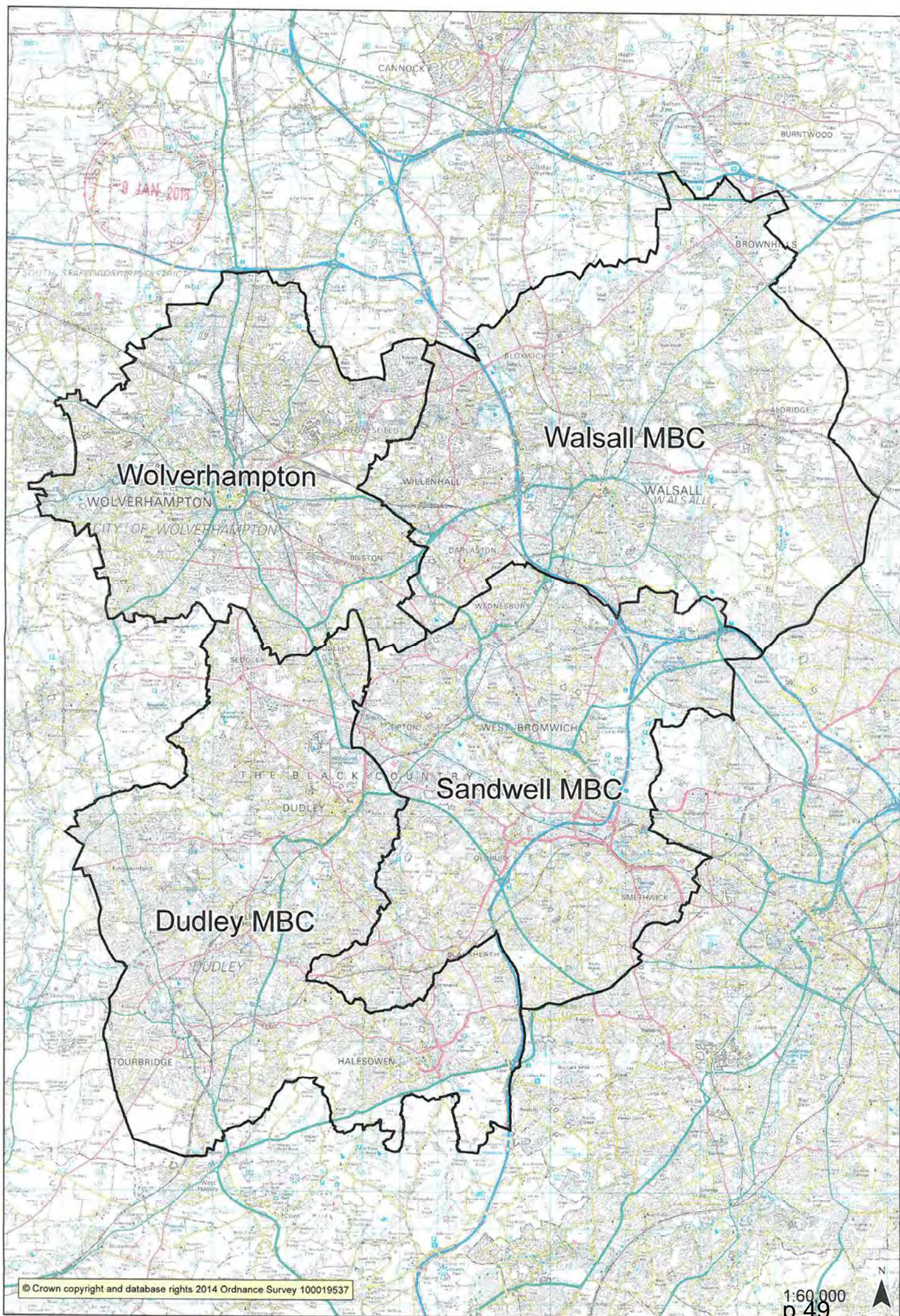
<https://www.supportthroughcourt.org>

King’s Bench Division Guide: <https://www.judiciary.uk/guidance-and-resources/kings-bench-division-guide-2022-2/>

A Handbook for for Litigants in Person: <https://www.judiciary.uk/guidance-and-resources/handbook-litigants-person-civil-221013>

Civil Procedure Rules Part 8: <https://www.justice.gov.uk/courts/procedure/civil/rules/part08>

Help with Court Fees website: <https://www.gov.uk/get-help-with-court-fees>



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
(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

**INJUNCTION - SECTION 37(1) SENIOR COURTS ACT 1981
(PROCEEDINGS BROUGHT PURSUANT TO SECTION 222 LOCAL GOVERNMENT ACT 1972)**

POWER OF ARREST

Under section 27 Police and Criminal Justice Act 2006

SEAL

The court orders that a power of arrest under section 27 Police and Criminal Justice Act 2006 applies to the following paragraph(s) of an order made on

WOLVERHAMPTON CITY COUNCIL & OTHERS v PERSONS UNKNOWN

(Here set out the provisions of the order to which this power of arrest applies and no others).

(Where marked * delete as appropriate)

2. **IT IS FORBIDDEN** for the Defendants to participate between the hours of 3:00 p.m. and 7:00 a.m. 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.
3. **IT IS ALSO FORBIDDEN** for the Defendants to participate between the hours of 3:00 p.m. and 7:00 a.m. 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

“Stunts” are driving manoeuvres often undertaken at such gatherings including but not limited to:

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

**POWER OF
ARREST**

In respect of a power of arrest under section 27 Police and Criminal Justice Act 2006, the Court, upon being satisfied pursuant to section 27(3) Police and Criminal Justice Act 2006 that the relevant conduct consists of or includes the use or threatened use of violence and/or there is a significant risk of harm to a person mentioned in section 27(2) of the said Act, has ordered that a power of arrest be attached to the order.

A power of arrest is attached to the order whereby any constable may (under the power given by Section 27(4) Police and Criminal Justice Act 2006) arrest without a warrant a person whom he has reasonable cause for suspecting to be in breach of any of the provisions set out in this order or otherwise in contempt of court in relation to such provision.

**This Power of
Arrest**

Shall come into effect on 12.01 a.m. (00:01 hours) on _____ and shall continue until 11:59 pm (23:59 hours) on _____, unless it is extended, varied or discharged by further order of the court.

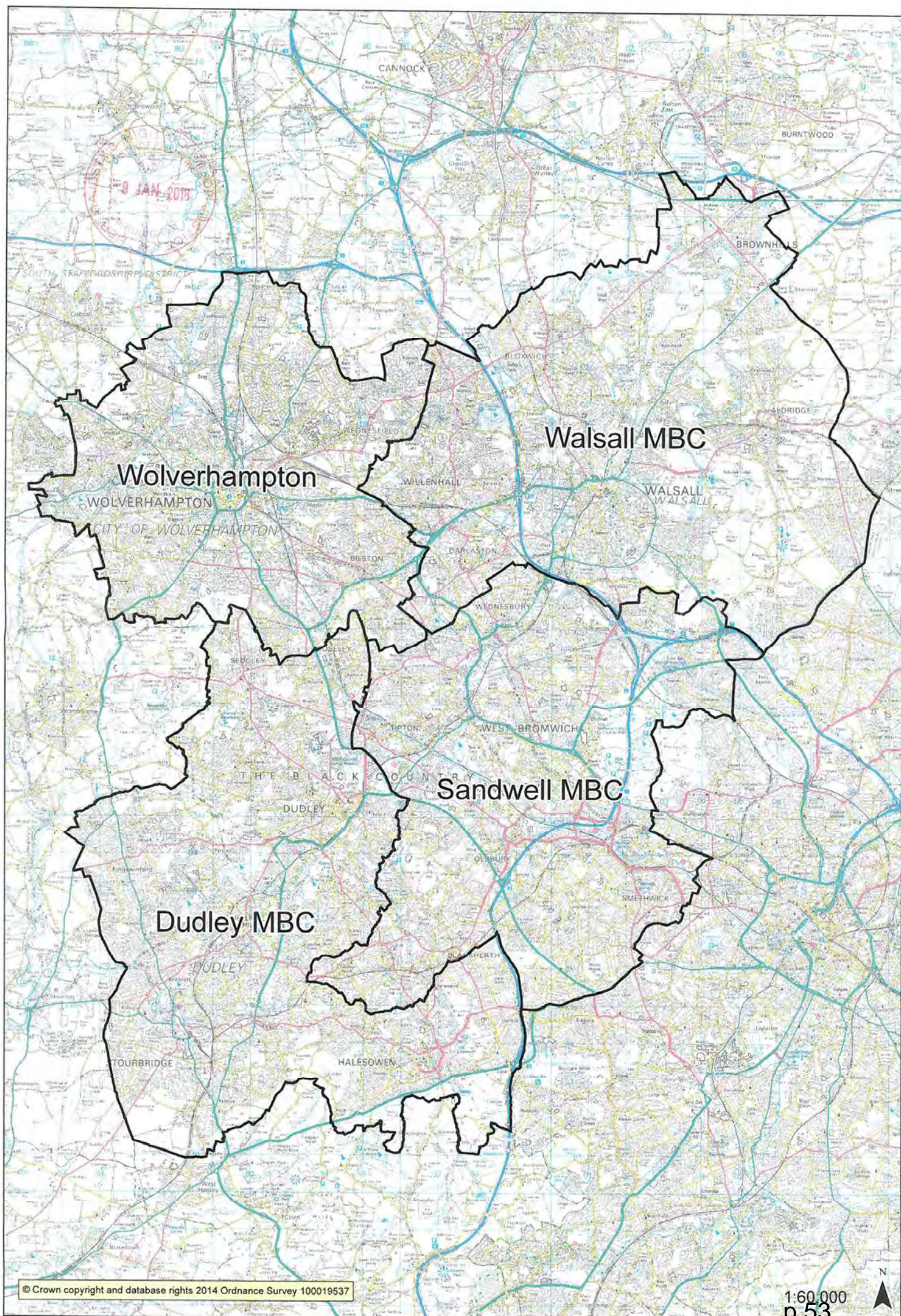
**Note to the
Arresting Officer**

Where a person is arrested under the power given by section 27(4) Police and Criminal Justice Act 2006, section 27(6) Police and Criminal Justice Act 2006 requires that:

- A constable shall, after making such an arrest, forthwith inform the person on whose application the injunction was granted;
- Such person shall be brought before the relevant judge within 24 hours beginning at the time of his arrest; And if the matter is not then disposed of forthwith, the Judge may remand such person.
- Nothing in section 155 authorises the detention of such person after the expiry of the period of 24 hours beginning at the time of his arrest, unless remanded by the court.
- In reckoning any period of 24 hours for these purposes, no account shall be taken of Christmas Day, Good Friday or any Sunday.

Ordered by

On



Wolverhampton

Walsall MBC

Sandwell MBC

Dudley MBC

**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 POLICE CONSTABLE MARK CAMPBELL

I, Mark Campbell, Police Constable 6018 of West Midlands Police currently stationed at Chelmsley Wood Police Station WILL SAY AS FOLLOWS:

1. This is my second statement on behalf of the West Midlands Police in support of the Claimants' application for an Injunction in relation to Street cruising within the Black Country local authority area generally and is a statement I make specifically in support of the Claimants' application for an interim injunction to restrain the activity of street racing within the Black Country (December 2022).

2. I have been a Police officer for 25 years and have worked on a number of specialist teams. I am now subject lead for Operation Hercules which is the West Midlands Police tactical approach to street cruising, which over the last couple of years has become a growing issue. I have been the West Midlands lead on this subject for approximately 3 years, and in that time. I have witnessed the organised approach that organisers take in facilitating such events. I have had a leading role in a number of different approaches to tackle the issues that street cruising causes.
3. On 9th December 2022 I provided a witness statement in respect of Birmingham City Council's 2022 application for an injunction to restrain street racing within the Birmingham City Council area (Claim no: KB-2022-BHM-000221). That particular statement was made by me in support of an application by Birmingham City Council whom I understood intended to apply for an urgent interim street racing injunction following a fatal road traffic incident in Oldbury, West Midlands (which falls within the Sandwell Metropolitan Borough Council Local Government area) late night on Sunday 20 November 2022. I exhibit a copy of that statement hereto marked as "**Exhibit MRC4**" for ease of reference.
4. In my profession opinion there is an urgent requirement for a Black Country and Birmingham interim Street Cruising injunction to be in place before Christmas, my concerns within my statement for Birmingham equally apply to the Black Country Borough Councils Application.
5. I fully understand that the Black Country Borough Councils now seek an urgent interim Street Cruising Injunction due to a double fatality road traffic collision, which occurred on Sunday 20th November in Oldbury, West Midlands. This double fatality was directly linked to an illegal street racing incident in Oldbury. The two individuals who were spectating were there to watch the street racing and the driver who caused the collision attended to take part in the cruise. This only highlights the real dangers caused by these activities and brings the untold tragedy to the forefront on everyone's minds. Had this illegal street cruising meet not taken place then the two individuals killed in the collision would still be alive. This tragedy is only too personal to me due to the fact that I knew one of the deceased. I had spoken to him on numerous occasions, he had also attended a diversionary/educational course that I run, which aims to highlighting the dangers of attending these meets
6. I can confirm I support and endorse the Claimant Black Country Borough Councils' application for urgent relief and consider the rise in incidents of car cruising with the Black Country and Birmingham areas of the West Midlands presents an imminent and significant risk of serious and possibly fatal injuries and significant nuisance for those affected areas. I also confirm responding to and dealing with the increase in street racing and street racing related activities is burdening already stretched police resources.
7. I am willing to attend court in this matter if required.

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

M.Campbell

Date

9 December 2022

Print name in full MARK CAMPBELL

For: Claimants
Statement of: Mark
Campbell
Statement no: 2
Exhibits: MRC4 – MRC4
Date: 9 December 2022

**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

EXHIBIT MRC4

This is the document referred to as "**Exhibit MRC4**" in the witness statement of PC Mark Campbell dated 9 December 2022.

(1) Birmingham City Council
(2) Claimant
(3) Statement of Mark Campbell
(4) 3rd
(5) Exhibits”
(6) 9/12/2022

IN THE HIGH COURT OF JUSTICE Claim No: KB-2022-BHN-000221
KING’S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY

In the matter of an application for an injunction under s.37(1), Senior Courts Act 1981, s.1, Localism Act 2011, s.222, Local Government Act 1972 and s.130, Highways Act 1980.

B E T W E E N :

BIRMINGHAM CITY COUNCIL

Claimant

and

(1) AHZI NAGMADIN

(2) JESSICA ELLEN ROBERTS

(4) RASHANI REID

(5) THOMAS WHITTAKER

(6) ARTHUR ROGERS

(7) ABC

**(8) PERSONS UNKNOWN WHO PARTICIPATE OR INTEND TO
PARTICIPATE IN STREET-CRUISES IN BIRMINGHAM, AS CAR
DRIVERS, MOTORCYCLE RIDERS, PASSENGERS AND/OR
SPECTATORS**

**(9) PERSONS UNKNOWN WHO, OR WHO INTEND TO, ORGANISE,
PROMOTE OR PUBLICISE STREET CRUISES IN BIRMINGHAM**

Defendants

**WITNESS STATEMENT OF
MARK CAMPBELL**

I, Mark Campbell, of West Midlands Police, will say as follows:

1. I am PC 6018 Campbell, and I am making this statement on behalf of the West Midlands Police in support of the claimant's application for an urgent interim Injunction in relation to Street cruising within Birmingham and in support of the Claimant's application for alternative service.
2. I have been a Police Officer for 25 years and have worked on a number of specialist teams. I am now subject lead for Operation Hercules which is the West Midlands Police tactical approach to street cruising. This has become a growing issue over the last couple of years. I have been West Midlands lead on this subject for approximately 3 years, and in that time, I have learned how the organisers facilitate such events. I have had a leading role in a number of different approaches to tackle the issues that street cruising causes. For example, I have together with the West Midlands Fire service developed a diversionary/educational course, highlighting the dangers of attending street cruising meets and the ripple effect that takes place if a collision occurs. Operation Hercules team have been involved in executing a number of warrants on individuals believed to be involved in organising or promoting street cruising, these warrants have had an impact on some of the organisers, but this tactic need to continue due to other organisers coming to the forefront.
3. I make this 3rd statement further to my statements dated 24th October 2022 and 1st December 2022. I am duly authorised to do so.

Alternative Service

4. I was asked by Birmingham Local authority to advertise on the West Midlands Police social media pages this application for a High Court street cruising injunction to draw this application to a wide audience who may have an interest in street cruising and to enable them to attend court if they wished. West Midlands Police advertised the new application on West Midlands Police/ Birmingham Police Facebook and Twitter feeds on [DATE]. The Facebook post was viewed by 154 people and we received 95 comments.
5. In particular, the Facebook post brought the proceedings to the attention of the Fourth Defendant, Rashani REID, the contact details for whom the Local Authority nor the Police previously had. The Fourth Defendant telephoned the Police and spoke to me. He told me that he had viewed the West Midlands Police Facebook post and asked why his name had appeared as a defendant as he stated that he did not organise street racing. He was spoken to regarding the fact that he had previously admitted to organising static meets within a car park and he had previously been seen attending these meets. REID was informed that Birmingham Local Authority were applying for a new High Court Street cruising injunction. The very fact that REID read the West Midlands Facebook post only highlights the effectiveness of advertising on social-media.
6. As part of the "Operation Hercules" tactical plan of dealing with the Street cruisers/street racers we often use West Midlands Traffic Facebook page to advertise the Police's response to any illegal street cruising meets. Over the last two years it has become clear that a very large number of the street cruisers, who attend meets in the West Midlands follow the various West Midlands Police Facebook and Twitter accounts. On numerous occasions the Police

having had arrested someone in relation to street racing or seized a car for taking part in this illegal activity, posted about this on social media, and the post has received over 500 comments. On a few occasions the number of comments has reached nearly 1 thousand. A number of the comments or views were from individuals that the I personally recognise from either attending or promoting street cruising meets.

Interim Injunction.

7. In my profession opinion an interim injunction needs to be in place urgently and before Christmas.
8. On Sunday 20th November 2022, there was a horrendous road traffic collision in which two young individuals lost their lives and two other spectators were seriously hurt, one received life changing injuries. This double fatality was directly linked to an illegal street racing meet incident in Oldbury. The two individuals who lost their lives were spectating at the race and the driver, who was arrested at the scene admitted attending the meet, but to purely show his car. This reasons for the collision are still currently being investigated. No further details can be released.
9. These incidents, in combination with the incidents that I described in my first witness statement dated 24 October 2022 at paragraphs 10, 13 and 54, highlight the real dangers caused by street cruising and brings the untold tragedy to the forefront of everyone's minds. Had these illegal street cruising meets not taken place then those individuals killed would still be alive.
10. The fact that the two most recent street cruising events were held within such a short period of time of each other also suggests that the organisers are taking advantage of the fact that the previous street-cruising injunction is no longer in place.

11. The crash that happened on 20 November 2022 also highlights the need for the various approaches taken by the Police to combat street cruising to work in combination with an injunction. This tragedy is personal to me in that I knew one of the deceased. I had spoken to him on numerous occasions, and had also attended a diversionary/educational course that I run, which aims to highlighting the dangers of attending these meets. If an injunction had been in force on 20 November 2022, it is significantly less likely that the street cruise would have been organised, and therefore the now deceased would not have had the opportunity to attend.
12. The circumstances of these deaths is not just something that happens in the West Midlands area, but a number of deaths throughout the England directly result from illegal street cruising meets.
13. I am aware of three upcoming street racing meets. The first and second organised meets are due to be held on Friday 9th December 2022 and Saturday 17th December 2022 in Birmingham at an undisclosed location. These meets are organised via a number of regional groups and are expected to be well attended.
14. The third illegal meet I am aware of is due to take place on 26th December, this is an annual event and always attracts large numbers of vehicles to various locations in the Birmingham and West Midlands areas, including the areas proposed to be covered by the Black Country Injunction application. Last years' Boxing Day meet attracted in the region of two hundred vehicles. During the event, those cars raced each other along roads including the A38 Sutton by pass, A47 including Port Parkway and Heartlands Parkway. Futhermore, the event attracted large amounts of anti-social behaviour including criminal damage in a number of car

parks including Asda, Minworth where Christmas trees were set on fire with the flames from modified cars.

15. 2023 will no doubt attract even more street cruising events which again will no doubt turn into illegal street racing, causing untold dangers to not only the car racers themselves, the spectators, but also innocent members of the public.

16. The reason I feel so strongly about this is because I have been tackling the issue of illegal street cruising for a number of years, and it has been proved that not just one type of enforcement will stop this illegal activity, a multi-pronged response including a Street cruising injunction is required. The Police have used various tactics in order to reduce the sheer volumes of calls that the Police receive on a weekly basis and has had some success, however from speaking with a large number of attendees to the street racing I am often told "You will not stop this". In my experience, an injunction with a power of arrest enables the police not only to arrest individuals involved in a street cruising meet, thereby disrupting that meet, but also means that people disperse in order to avoid being arrested. This is a very powerful tool. At the moment the individuals involved still organise more meets and unfortunately lessons are not learned. I cannot state how important the obtaining of interim relief is due to this attitude.

17. I am willing to attend court to give evidence.

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 honest belief in its truth

Signed M.Campbell

West Midlands Police

Dated this 9th day of December 2022

A. SECTION A - STATEMENTS OF CASE



Claim Form (CPR Part 8)

In the High Court of Justice, King's Bench Division
Birmingham District Registry

Claim no.

Fee Account no.

PBA0082797

Help with Fees -
Ref no. (if appli-
cable)

H W F - - - -

Claimant

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

C/O WOLVERHAMPTON CITY COUNCIL, LEGAL SERVICES, CIVIC CENTRE,
ST PETER'S SQUARE, WOLVERHAMPTON, WV1 1RG

SEAL

Defendant(s)

PERSONS UNKNOWN
(AS DESCRIBED IN THE ATTACHED PARTICULARS OF CLAIM)

Does your claim include any issues under the Human Rights Act 1998? ☐ Yes ☒ No

Details of claim (see also overleaf)

The Claimants respectfully invite the honourable court to grant injunctive relief (reinforced with a power off arrest pursuant to the Court's powers under section 37(1) of the Senior Courts Act 1981 to restrain street racing and associated dangerous driving activities in the Black Country area (which the Claimants define, for the purposes of this injunction as the entirety of the combined local government areas of Dudley, Sandwell, Walsall and Wolverhampton Councils).

Should the honourable Court be minded to grant the injunctive relief sought by the Claimants, the Claimants further invite the Court to exercise the discretion granted to it pursuant to rule 81.8 of the Civil Procedure Rules and dispense with the requirement to serve any injunction and power of arrest on persons unknown personally and instead serve any injunction and power of arrest granted by alternative means.

Full details of the claim together with draft orders and further details of the requisite steps the Claimants suggest would achieve effective alternative service of the order, should the honrouable court grant any injunction and power of arrest, on persons unknown as particularised in the attached documentation and also be minded to permit the Claimants to serve any order by alternative means to personal service.

(Continued overleaf ...)

Defendant's
name and
address

PERSONS UNKNOWN
(AS DESCRIBED IN THE ATTACHED
PARTICULARS OF CLAIM)

£

Court fee

569.00

Legal representative's
costs

Issue date

Details of claim (continued)

The Claimants would respectfully draw attention to the attached particulars of claim for full details of this claim.

"BLACK COUNTRY CAR CRUISE"
 WOLVERHAMPTON CITY COUNCIL
 DX744350 WOLVERHAMPTON 27
 REF: LIT/AS/LIJ017753P
 E-mail: litigation@wolverhampton.gov.uk

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.


Statement of Truth

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.

☐ **I believe** that the facts stated in these particulars of claim are true.

☒ **The Claimant believes** that the facts stated in these particulars of claim are true. **I am authorised** by the claimant to sign this statement.

Signature



☐ Claimant

☐ Litigation friend (where claimant is a child or a Protected Party)

☒ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day

07

Month

10

Year

2022

Full name

DAVID PATTISON

Name of claimant's legal representative's firm

WOLVERHAMPTON CITY COUNCIL

If signing on behalf of firm or company give position or office held

CHIEF OPERATING OFFICER

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Claim No.

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

B E T W E E N:-

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

Claimants

-and-

PERSONS UNKNOWN

Defendant

PARTICULARS OF CLAIM

Wolverhampton City Council,
Legal Services,
Civic Centre,
St Peter's Square,
Wolverhampton

Ref: LIJ017753P/01201576

Solicitor for the Claimants

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

Claim No.

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

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)

Defendants

PARTICULARS OF CLAIM

Introduction

- 1 Part 8 of the Civil Procedure Rules 1998 applies to this claim.
- 2 In these Particulars of Claim the following definitions have been applied:
 - (1) "The Black Country" the combined local authority areas of all the Claimants. The Claimants areas are shown on the plan annexed hereto (Plan A).
 - (2) "Car Cruising" organised or impromptu events at which drivers of cars race, perform driving stunts, drive dangerously and drive in convoy. Such activities may be noisy, dangerous and illegal, obstructing highways and the premises bordering them, damaging property and putting the safety of spectators and other persons at risk.
 - (3) The "Original Injunction" Injunction granted by HHJ Owen QC on 1 December 2014 and renewed by HHJ McKenna on 9 January 2018 in *Wolverhampton & Others v Persons Unknown* [2014] (Claim No A90BM228) which was in effect from 2 February 2015

- (4) "Stunts" Driving manoeuvres often undertaken as part of car cruising including:
- (a) "Burnouts" Causing a vehicle to destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed.
 - (b) "Donuts/Donutting" Causing a vehicle to rotate around a fixed point (normally the front axle) while not moving-off causing noise, smoke and tyre marks to be created.
 - (c) "Drifting" Turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input.
 - (d) "Undertaking" passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code.

- 3 The Claimants are local authorities with the meaning of the Local Government Act 1972.
- 4 The West Midland Police Force ('the Police') serve the areas of all the Claimants.
- 5 Since, at least, 2012 the Claimants have, in co-operation with the Police, have been attempting to eliminate car cruising in their areas.

6 By this claim the Claimants seek an injunction restraining car cruising across the whole of the Black Country.

Background

7 The Claimants obtained the Original Injunction which was in effect from 2 February 2015 until 1 February 2021.

8 The Claimants aver that the Original Injunction caused or contributed to a substantial reduction in car cruising in the Black Country and the committal proceedings brought for breach of the Original Injunction served as a deterrent to persons contemplating car cruising.

9 The Original Injunction did not eliminate car cruising but did cause a decrease in such activity. Since the order lapsed there has been a marked increase.

Relevant Enactments

10 Section 37(1) Senior Courts Act 1981 provides that:

“The High Court may by order (whether interlocutory or final) grant an injunction or appoint a receiver in all cases in which it appears to the court to be just and convenient to do so.”

11 For the reasons set out in the evidence filed herewith (and the evidence in support of the application for the Original Injunction) the Claimants will contend it is just and convenient for the honourable court to grant an injunction in this instance.

12 Section 111(1) Local Government Act 1972 provides that:

“Without prejudice to any powers exercisable apart from this section but subject to the provisions of this Act and any other enactment passed before or after this Act, a local authority shall have power to do anything (whether or not involving the expenditure, borrowing or lending of money or the acquisition or disposal of any property or rights) which is calculated to facilitate, or is conducive or incidental to, the discharge of any of their functions.”

13 Section 222 Local Government Act 1972 extends that power and empowers local authorities to become involved in litigation if so doing facilitates the discharge of their functions and is in the interest of their inhabitants.

14 Section 222(1) Local Government Act 1972 provides that:

(1) “Where a local authority consider it expedient for the promotion or protection of the interests of the inhabitants of their area—

- (a) they may prosecute or defend or appear in any legal proceedings and, in the case of civil proceedings, may institute them in their own name, and
- (b) they may, in their own name, make representations in the interests of the inhabitants at any public inquiry held by or on behalf of any Minister or public body under any enactment."

15 Further, section 1 of the Localism Act 2011 provides that a local authority has power to do anything that individuals may do.

16 Accordingly, the Claimants are entitled to bring this claim for the benefit of all inhabitants of the Black Country. Further it is just and convenient and in accordance with the overring objective for all the Claimants to bring a single claim.

17 By section 130, Highways Act 1980, the Claimants are under a duty to assert and protect the rights of the public to the use and enjoyment of any highway for which they are the highway authority. The injunctive relief sought in these proceedings is necessary to protect the rights of the public to the use and enjoyment of highways within the Claimants' districts.

18 By section 6 of the Crime and Disorder Act 1998, local authorities must formulate and implement, *inter alia*, a strategy for the reduction of crime and disorder in their areas (including anti-social and other behaviour adversely affecting the local environment), which strategy the authorities must keep under review for the purposes of monitoring its effectiveness and making any necessary or expedient changes.

19 Section 17(1) Crime and Disorder Act 1998 provides that:

“Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area.”

20 The Claimants contend that taking measures to combat car cruising falls within and forms part of their statutory function (set out above) to reduce crime and disorder in their areas.

Factual Background

- 21 The Claimants will rely upon the witness statements filed with this Claim Form and those filed in support of the adjourned application to extend the Original Injunction.
- 22 In summary the Claimants aver that:
- (1) Persons participating in car cruising meet on highways and areas adjacent to highways. Such areas include industrial estates and car parks.
 - (2) The locations for such meetings vary but are to be found throughout the Black Country.
 - (3) Such meetings may be publicised in advance via social media or word of mouth or may be impromptu.
 - (4) At such meetings some or all of conduct set out above takes place.
 - (5) Such conduct affects the safety, comfort, well-being and livelihoods of inhabitants of the Black Country.
 - (6) Such conduct diverts the resources of the Police, Ambulance Service and hospitals away from other legitimate matters.
- 23 The Original Injunction was effective in reducing and inhibiting car cruising.

24 Since 2 February 2021 car cruising has again increased with more events and larger numbers of spectators at such events. The Police are receiving an increased volume of calls relating to such activities.

25 Such increased activity has continued following the relaxation of restrictions on social gatherings imposed during the covid-19 pandemic. There appears to be a growing perception among those who engage in car cruising that the Claimants and the Police are impotent to restrict the activity.

Justification for an Injunction

26 An Injunction in the terms sought would assist the Claimants in discharging their statutory duties set out above.

27 Such an Injunction would be of benefit to persons generally throughout the Black Country.

28 The proposed Injunction does not interfere with rights and freedoms of the Defendants since the behaviour that it seeks to prohibit is illegal and/or anti-social. The Defendants remain free to attend lawful motorsports events and exhibitions.

Power of Arrest

29 Section 27 of the Police and Justice Act 2006 provides *inter alia*:

“(1) This section applies to proceedings in which a local authority is a party by virtue of section 222 of the Local Government Act 1972 (c 70) (power of local authority to bring, defend or appear in proceedings for the promotion or protection of the interests of inhabitants of their area).

(2) If the court grants an injunction which prohibits conduct which is capable of causing nuisance or annoyance to a person it may, if subsection (3) applies, attach a power of arrest to any provision of the injunction.

(3) This subsection applies if the local authority applies to the court to attach the power of arrest and the court thinks that either—

(a) the conduct mentioned in subsection (2) consists of or includes the use or threatened use of violence, or

(b) there is a significant risk of harm to the person mentioned in that subsection...”

30 The Claimants aver that car cruising causes and is capable of causing nuisance or annoyance to persons in the Black Country and that the car cruising creates a significant risk of harm to such persons.

Service of this Claim Form

31 The Claimants seek orders for service of the Claim Form and supporting documentation by alternative means pursuant to CPR 6.15 & 6.27. The proposed steps to effect service are set out in a draft Order. Such steps are likely to bring this Claim and the hearing of the application for an Injunction to the attention of those persons who may wish to oppose the making of the order or intervene in the proceedings.

Service of any Injunction Granted

32 The Claimants will also seek an order dispensing with personal service of the Injunction. The proposed steps to bring the order to the attention of persons likely to be affected by any Injunction are set out in a draft order.

33 The Claimants submit that such steps are likely to ensure that awareness of the existence of the Injunction will be widespread throughout the Black Country.

And the Claimants claim:

- (1) An Injunction Order in the form annexed hereto;
- (2) A Power of Arrest ancillary to such Injunction;

(3) Such further or other relief as the Court thinks fit.

MICHAEL SINGLETON


DATED this 07 day of OCTOBER 2022

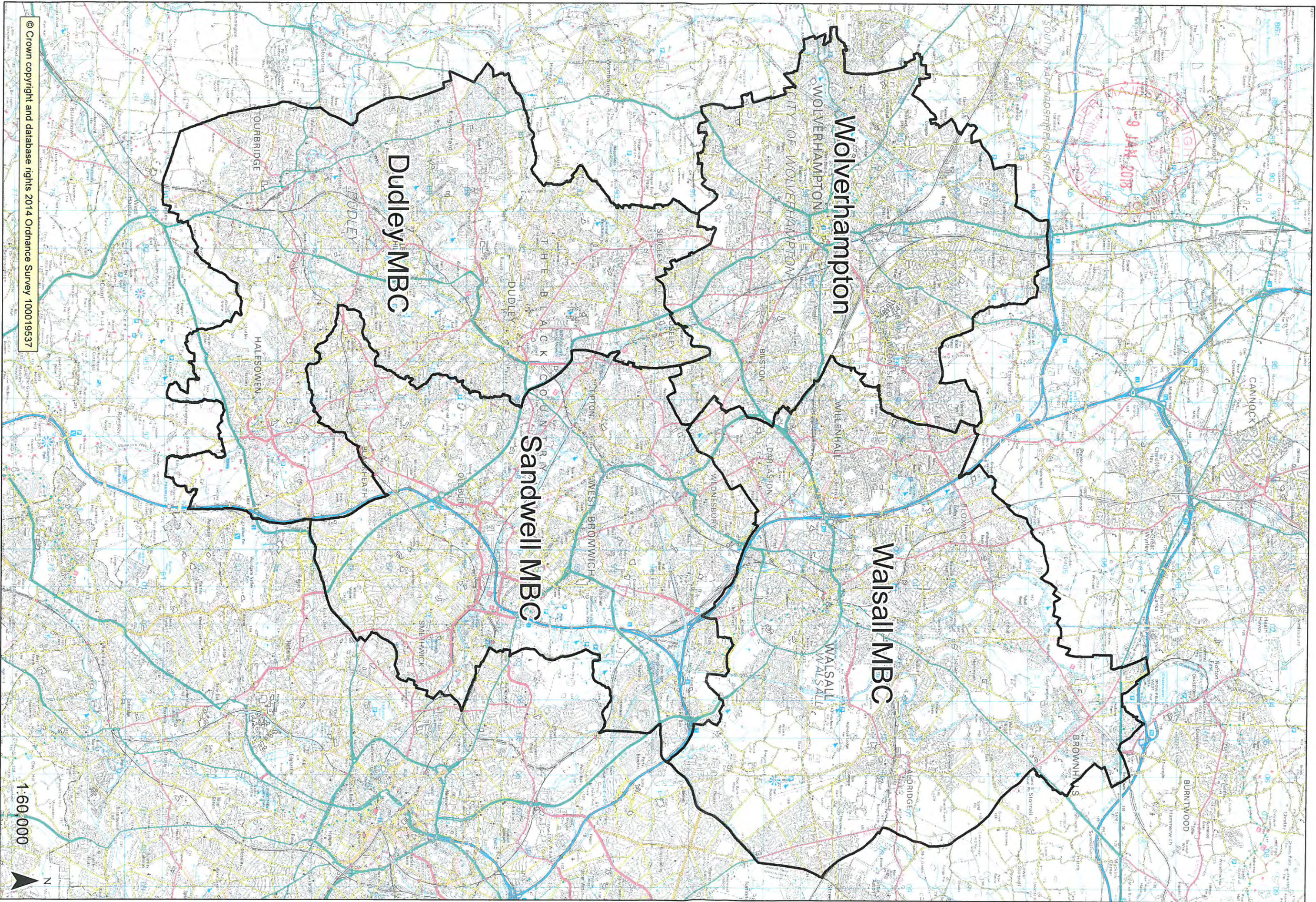
The Claimants believe that the facts stated in these Particulars of Claim are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I am duly authorised by all the Claimants to sign this statement.

FULL NAME: DAVID PATTISON

POSITION OR OFFICE HELD: CHIEF OPERATING OFFICER

SIGNED: 



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1:60,000



Application for Injunction (General Form)

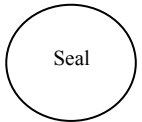
Name of court High Court of Justice	Claim No.
Claimant's Name and Ref. WOLVERHAMPTON CITY COUNCIL (ref: LIT/AS/LIJ017753P)	
Defendant's Name and Ref. PERSONS UNKNOWN	
Fee Account no. PBA0082797	

Notes on completion

Tick which boxes apply and specify the legislation where appropriate

- (1) Enter the full name of the person making the application
- (2) Enter the full name of the person the injunction is to be directed to
- (3) Set out any proposed orders requiring acts to be done. Delete if no mandatory order is sought.
- (4) Set out here the proposed terms of the injunction order (if the defendant is a limited company delete the wording in brackets and insert 'whether by its servants, agents, officers or otherwise').
- (5) Set out here any further terms asked for including provision for costs

- ☐ By application in pending proceedings
- ☒ Under Statutory provision s.37(1) Senior Courts Act 1981
- ☐ This application is made under Part 8 of the Civil Procedure Rules



This application raises issues under the Human Rights Act 1998

☐

Yes

☒

No

The Claimant ⁽¹⁾ WOLVERHAMPTON CITY COUNCIL applies to the court for an injunction order in the following terms:

- 1. The Defendants be forbidden (whether by themselves or by instructing or encouraging or permitting any other person) ⁽⁴⁾**

To participate between the hours of 3:00 p.m. and 7:00 a.m. 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. To participate between the hours of 3:00 p.m. and 7:00 a.m. 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. To promote, organise or publicise (by any means whatsoever) any gathering between the hours of 3:00 p.m. and 7:00 a.m. 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).**

The court office at The High Court of Justice, Birmingham District Registry, 5th Floor, Priory Courts, 33 Bull Street, Birmingham, B4 6DS (telephone: 0121 681 4441) is open between 10 a.m. to 4 p.m. Mondays to Fridays (excluding public holidays.) When contacting the court please mark any correspondence for the attention of the Court Manager and always quote the Claim number.

N16A General form of application for injunction (05.14)

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Stunts are driving manoeuvres often undertaken at such gatherings including but not limited to:

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

(6)Enter the names of all persons who have sworn affidavits or signed statements in support of this application

And that ⁽⁵⁾ **a power of arrest applies to clauses 1 and 2 of the injunction set out above.**

(7)Enter the names and addresses of all persons upon whom it is intended to serve this application

The grounds of this application are set out in the written evidence of ⁽⁶⁾ Please see appended index of evidence to the bundle of documents filed in support of this application.

This written evidence is served with this application.

This application is to be served upon ⁽⁷⁾ PERSONS UNKNOWN

(8)Enter the full name and address for service and delete as required

This application is filed by ⁽⁸⁾ Wolverhampton City Council,
(the Solicitors for) the Claimants
whose address for service is **Civic Centre, St Peter's Square, Wolverhampton,WV1 1RG**

Signed



Dated 07 October 2022

*
Name and address of the person application is directed to

To*
of

This section to be completed by the court

This application will be heard by the (District) Judge

at

on

the

day of

20

at

o'clock

If you do not attend at the time shown the court may make an injunction order in your absence

If you do not fully understand this application you should go to a Solicitor, Legal Advice Centre or a Citizens' Advice Bureau

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 3:00 P.M. AND 7:00 A.M. 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 3:00 P.M. AND 7:00 A.M. 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 3:00 P.M. AND 7:00 A.M. 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)

Respondents

BUNDLE OF EVIDENCE IN SUPPORT OF APPLICATION FOR AN INJUNCTION

A. SECTION A - STATEMENTS OF CASE

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2.	Overarching Statement of Pardip Nagra (For Wolverhampton) 19 July 2022	B 4 - B 35
3.	EXHIBIT PN1	B 36
4.	Exhibit PN1 - Statement of Lisa Fox (From 2014 Application) 02 11 2013	B 37 - B 40
5.	EXHIBIT PN2	B 41
6.	Exhibit PN2 - Statement of Peter James (From 2014 Application) 09 11 2013	B 42 - B 44
7.	EXHIBIT PN3	B 45
8.	Exhibit PN3 - Statement of Carl Yeomans (From 2014 Application) 07 11 2013	B 46 - B 49
9.	EXHIBIT PN4	B 50
10.	Exhibit PN4 - Statements of David Clark (From 2014 Application) 12 03 2014	B 51 - B 70
11.	EXHIBIT PN5	B 71
12.	Exhibit PN5 - Statement of Lisa Parmar (From 2014 Application) 22 05 2014	B 72 - B 88
13.	EXHIBIT PN6	B 89
14.	Exhibit PN6 - Statement of Lydia Pulford (From 2014 Application) 11 11 2013	B 90 - B 92
15.	EXHIBIT PN7	B 93
16.	Exhibit PN7 Statement of Fanella Bird (From 2014 Application) 23 11 2014	B 94 - B 95
17.	Exhibit PN7 Statement of Fanella Bird (From 2014 Application) 23 11 2014	B 96
18.	EXHIBIT PN8	B 97
19.	Exhibit PN8 - Statement of PC J Hartford (From 2014 Application) 16 11 2013	B 98 - B 99
20.	EXHIBIT PN9	B 100
21.	Exhibit PN9 - Statement of Richard Hardy (From 2014 Application) 06 11 2013	B 101 - B 103
22.	EXHIBIT PN10	B 104
23.	Exhibit PN10 - Statement of Police Inspector Julie Mason (From 2014 Application) 23 07 2014	B 105 - B 109
24.	EXHIBIT PN11 - (Video Footage Available Separately)	B 110
25.	EXHIBIT PN12	B 111
26.	Exhibit PN12 - E-mail from Lisa Fox 17 April 2021	B 112
27.	EXHIBIT PN13	B 113
28.	Exhibit PN13 - Express & Star Article 12 04 22 direct print from Website	B 114 - B 126
29.	Exhibit PN13 Print Friendly Version of E & S Article 12 04 2022	B 127 - B 129
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31.	Exhibit PN14 - Letter from Councillor Leach to Wolverhampton ASB Team 05 22	B 131
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37.	Exhibit PN17 - Version 1 Print Friendly Version of story published on E & S Website 15 08 2018	B 137 - B 142
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40.	Exhibit PN18 - Essex Live Article 5 April 2021 (Print Friendly Version)	B 162 - B 164
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42.	EXHIBIT PN19	B 171
43.	Exhibit PN19 - Media release July 2022	B 172 - B 173
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C. SECTIONC- Overarching Statements of Professionals for Each Claimant Local Authority

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3.	Exhibit Cover - Exhibit PS1 (Pardip Sandhu 27.9.2022)	C 13
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1.	Signed statement of James Morris MP (For Dudley)	E 1 - E 6
2.	Statement of Stacy Hewerdine - Waterfront Security 10-05-22 (For Dudley)	E 7 - E 12
3.	Exhibit Cover - EXHIBIT SH1 [Stacy Hewedine] (For Dudley) (Clearer Version of Exhibit SH1)	E 13
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5.	Signed statement of Richard Hubbard- Harris - Showcase 10-05-22 (For Dudley)	E 15 - E 22
6.	Exhibit Cover RHH1 [Richard Hubbard-Harris] (For Dudley) (Clearer Version of Exhibit RHH1)	E 23
7.	EXHIBIT RHH1 Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 24
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16.	Exhibit RHH5 - Cover Sheet	E 43
17.	EXHIBIT RHH5	E 44
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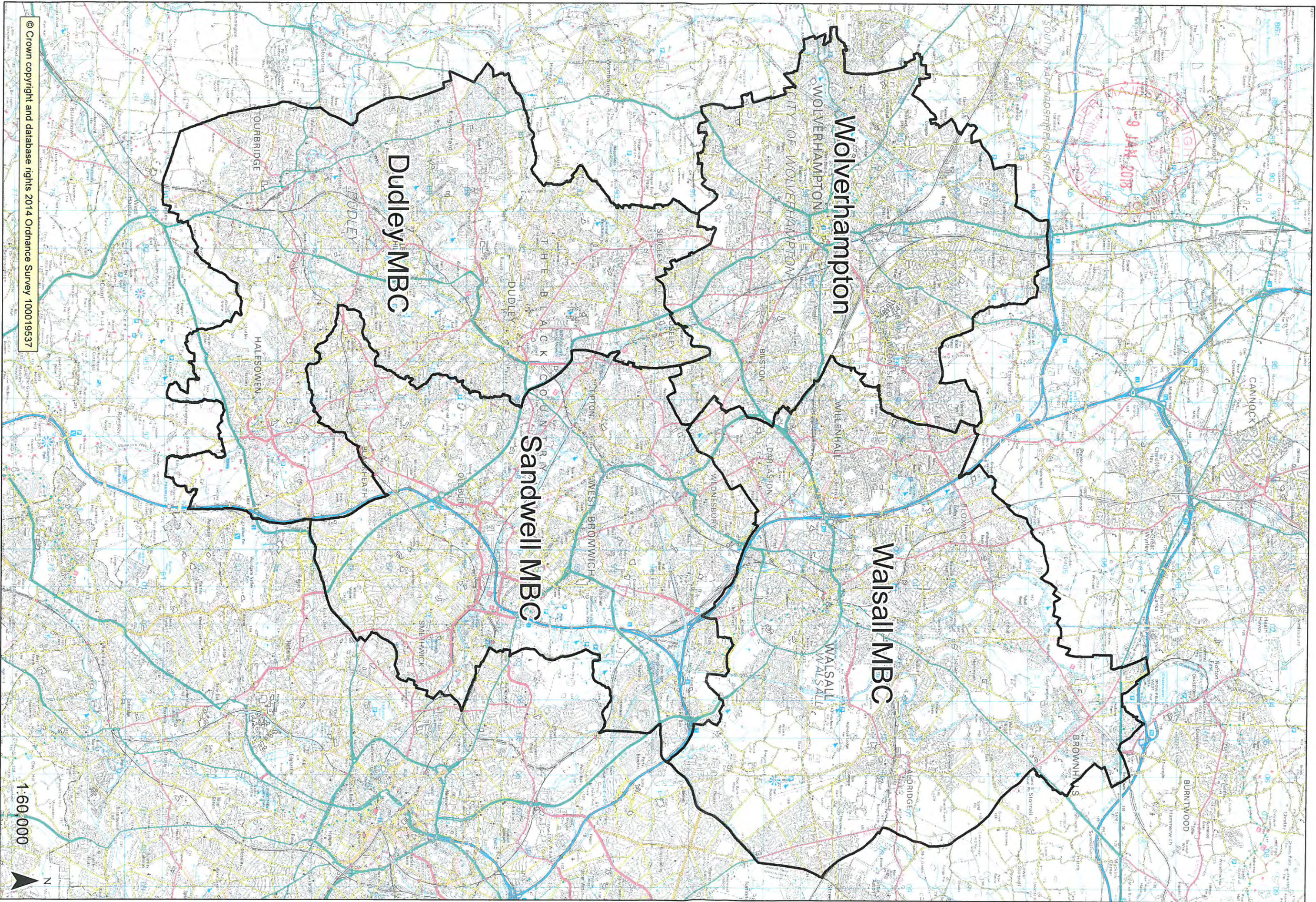
20.	Exhibit RHH7- Cover Sheet	E 48
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1.	Letter from Nicola Richards MP 25 04 22	F 1
2.	Witness Statement of Donata Halasa (Sandwell) 10 06 22	F 2 - F 3
3.	Witness Statement of John Gallagher (Sandwell) 31 05 22	F 4 - F 5
4.	Witness Statement of Nicki Wellings (Wolverhampton) 11 06 22	F 6
5.	Witness Statement of Ronald Hill (Sandwell) 31 05 22	F 7
6.	Witness Statemet of Sheila Powell (Sandwell) 10 06 22	F 8 - F 9

G. SECTION G - Statements of Councillors, MPs, Residents and Business for Walsall

1.	Witness Statement of Simon Pearson (Walsall) 28 04 22	G 1 - G 2
2.	Witness Statement of Kelly Matthews (Walsall) 28 04 22	G 3 - G 4
3.	Witness Statement of Julia Westwood (Walsall) 13 05 2022	G 5 - G 6
4.	Witness Statement of Lee Roden (Walsall) 21 05 2022	G 7 - G 8
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6.	Witness Statement of Ravdeep Khara (Walsall) 24 05 2022	G 11 - G 12



I N J U N C T I O N

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

B E T W E E N:

Claim no:

(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 3:00 p.m. and 7:00 a.m. 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 3:00 p.m. and 7:00 a.m. 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 3:00 p.m. and 7:00 a.m. 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

To:	<p>1. Persons Unknown who participate between the hours of 3:00 p.m. and 7:00 a.m. 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</p> <p>2. Persons Unknown who participate between the hours of 3:00 p.m. and 7:00 a.m. 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</p> <p>3. Persons Unknown promoting organising publicising (by any means whatsoever) any gathering between the hours of 3:00 p.m. and 7:00 a.m. 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)</p>
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Claimants	WOLVERHAMPTON CITY COUNCIL & OTHERS
Defendants	<p>1. Persons Unknown who participate between the hours of 3:00 p.m. and 7:00 a.m. 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</p> <p>2. Persons Unknown who participate between the hours of 3:00 p.m. and 7:00 a.m. 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</p> <p>3. Persons Unknown promoting organising publicising (by any means whatsoever) any gathering between the hours of 3:00 p.m. and 7:00 a.m. 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)</p>

PENAL NOTICE

IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DO NOT COMPLY WITH THIS ORDER, YOU MAY BE HELD IN CONTEMPT OF COURT AND IMPRISONED OR FINED OR YOUR ASSETS MAY BE SEIZED

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order but you must obey the order unless it is varied or discharged by the Court.

A Defendant who is an individual who is ordered not to do something must not do it himself/herself or in any other way. He/she must not do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

Before sitting, at the High Court of Justice, Birmingham District Registry, Priory Courts, 33 Bull Street, Birmingham, B4 6DS on

UPON the Claimants' application, by an Application Notice dated ,for an injunction pursuant to section 222 Local Government Act 1972 and section 130 Highways Act 1980 and the Court exercising its discretion to grant injunctive relief pursuant to section 37(1) Senior Courts Act 1981

AND UPON making an Order on making directions and approving service in respect of the Claim Form, the Claimant's Application and the evidence in support by alternative means pursuant to CPR r. 6.15 and r. 6.27.

AND UPON the Claimants confirming that this Order is not intended to prohibit lawful motorsport taking place on private land where planning permission has been granted and such activities take place under an approved code or licence from a recognised regulatory body.

AND UPON hearing Counsel for the Claimants

IT IS ORDERED THAT:

Service by Alternative Method-Proceedings

1. Pursuant to CPR r. 6.15 and r.6.27, the steps that the Claimants have taken to serve the Claim, the Application and the evidence in support on the Defendants shall amount to good and proper service of the proceedings on the Defendants and each of them.

Injunction in force

- 2. IT IS FORBIDDEN for the Defendants to participate between the hours of 3:00 p.m. and 7:00 a.m. 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.**
- 3. IT IS ALSO FORBIDDEN for the Defendants to participate between the hours of 3:00 p.m. and 7:00 a.m. 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**
- 4. IT IS ALSO FORBIDDEN for the Defendants to promote organise publicise (by any means whatsoever) any gathering between the hours of 3:00 p.m. and 7:00 a.m. 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)**

Stunts are driving manoeuvres often undertaken at such gatherings including but not limited to:

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

- 5. A Power of Arrest pursuant to section 27 Police and Criminal Justice Act 2006 shall apply to clauses 2 & 3 of this Order.**

Service by Alternative Method - This Order

6. The Court will provide copies of this Order to the Claimants' solicitors (whose details are set out below) for service.
7. Pursuant to CPR r 6.27 and r 81.4:

The Claimants shall serve this Order upon the Defendants by :

- a. Issuing a media release highlighting the granting of the High Court injunction and power of arrest. 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, and BBC Midlands Today and ITV Central.
- b. Placing on the Claimants' social media including Twitter and Facebook links to the above media release regarding the granting of the High Court injunction and power of arrest and highlighting introduction of injunction and power of arrest.
- c. Updating the dedicated pages on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council and Walsall Council about the injunction and power of arrest, and date of introduction of the injunction at the following webpages:

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

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

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

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

Such pages shall carry a direct link to this order.

- d. Placing a copy of the injunction and power of arrest in the Express & Star and Chronicle Week newspapers

- e. Uploading to the video sharing website “You Tube”, a video of someone presenting and reciting a copy of the terms of the Injunction with a stark warning that should people be participate in car cruising in the Black Country they may be in breach of the Injunction and liable to committal proceedings for contempt of court which could result in the court imposing: a sentence of imprisonment; a fine; or an order seizing a person’s assets.
- f. Erecting and maintaining official road signs (fixed, temporary and electronic) throughout the Black Country Area in locations that are, or have been, hotspots of car cruising activity stating “HIGH COURT INJUNCTION PROHIBITING CAR CRUISING IN FORCE IN THIS AREA”
- g. Ensuring that copies of the Injunction and Power of Arrest are available at the front desks of the Claimants’ main offices. West Midlands Police will ensure that copies of the Injunction and Power of Arrest are available at the front desks of their stations throughout the Black Country Area.

8. These steps shall be completed by

Commencement, Term and Duration

9. This Order & Power of Arrest shall come into effect at 12.01 a.m. (00:01 hours) on , provided that the Claimants, by their proper officer have given to the court written notice that the steps identified at paragraph 8 above have been completed. [Such notice shall be by a witness statement/s from the Claimants’ proper officer (solicitor or administrative staff official)].

10. This Order & Power of Arrest shall, expire at 11.59 p.m. (23:59 hours) on unless it is extended, varied or discharged by further order of the court.

Further Case Management

11. A review hearing will take place in open court (elk 30 minutes) before a Judge of the High Court (section 9 if practicable) after this order has been in force for 12 months and no longer than 14 months. The Claimants shall file with the court a succinct report to inform the court of their experience with the publication, operation and enforcement of the extended order, including for example, breaches, warnings or problems, if any arising out the extended order (including the Power of Arrest).
12. Without prejudice to the foregoing, any person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Claimants' solicitors immediately (and in any event not less than 48 hours before the hearing of any such application) via the contact details set out below. Schedule A to this Order indicates the process which must be followed for any such application. Useful sources of support and information are listed in Schedule C.
13. Any person applying to vary or discharge this Order must provide their full name and address, an address for service, and must also apply to be joined as a Named Defendant to the proceedings at the same time.
14. Any Person who believes that they will or might bring themselves within the definition of the "persons unknown" by their conduct and who wishes to oppose these proceedings should file an Acknowledgment of Service pursuant to CPR Part 8.3 and serve a copy on the Claimants solicitors via the email address set out in paragraph 21 below. Schedule B to this Order indicates the process which must be followed.
15. Any Defendant who fails to comply with paragraph 14 above shall not be permitted to defend these proceedings or take any further role in these proceedings without further order of the Court and shall be liable to have injunctive relief continued against them without trial pursuant to CPR r. 3.5.
16. The Claimants otherwise have permission to apply to extend or vary this Order or for further directions.

17. Save as provided for above, the Claim be stayed generally with liberty to restore.

Documents in the Claim and Application

18. A single hard copy of any document will be sent within 21 days of the receipt of a reasonable request for that document or documents via the Claimants' solicitors whose contact details are set out below so long as any requests include a postal address and the full name of the requestor.

Communications with Claimants and the Court

19. All communications to the Court about this Order (which should quote the case number) should be sent to:

Birmingham District Registry Civil Justice Centre
Priory Courts
33 Bull Street
Birmingham
B4 6DW

E: qb.birmingham@justice.gov.uk T: 0121 681 4441
F: 01264 785 131
DX: 701987 Birmingham 7

20. Any person who wishes to view or download copies of the documents shall contact the Claimants' solicitors via the contact details below.

21. The Claimants' solicitors and their contact details are:

FAO: Black Country Car Cruise
Legal Services
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG

E: litigation@wolverhampton.gov.uk
T: 01902 556556
DX: 744350 Wolverhampton 27
Ref: LIT/AS/WHA017753P

Dated:

SCHEDULE A – STEPS TO VARY OR DISCHARGE THIS ORDER

If, in accordance with paragraph 12 above, any Defendant or any other person affected by this Order wishes to apply to vary or discharge this Order, to ensure effective case management by the Court the following indicative steps must be followed:

1. Any person seeking to contest the Claimants' entitlement to interim relief should file with the court (i.e. send to the court) and serve (i.e. send to the Claimants):

(a) An N244 application form¹;

(b) Written grounds (which may be contained in within the N244 application form or a separate document) for:

- i. permission to bring the application; and
- ii. the application (i.e. reasons for the proposed variation / discharge of the Order).

(c) A witness statement(s) containing and/or appending all of the evidence to be relied upon in support of the application.

2. In order to file the above documents with the Court, the applicant should:

(a) Send physical copies of the documents to the address at paragraph 19 of this Order; and/or

(b) Speak to the Court to obtain an address to send electronic copies of the documents to.

3. In order to serve the above documents on the Claimants, the applicant should:

(a) Send physical copies of the documents to the address at paragraph 21 of this Order; and/or

(b) Send electronic copies of the documents to the e-mail address at paragraph 21 above.

4. The person making the application should indicate to the Court and Claimants whether they consider the matter requires a court hearing or can be dealt with by the judge reviewing the paper application and any response from the Claimants.

5. Thereafter the Claimants shall have 14 days to file and serve evidence and submissions in response, including as to whether an oral hearing is required to determine the application.

6. Within 21 days, the Court shall decide:

- a whether to grant permission for the application to proceed; and
- b if permission is granted, whether a hearing is necessary, and/or may request from the parties evidence on any further matters necessary to determine the application. If the Court decides that a hearing is necessary, it shall seek to schedule the hearing (accommodating availabilities of the parties) within 42 days (6 weeks).

¹ 1 See the following link which provides a digital version of the form, and guidance notes:
<https://www.gov.uk/government/publications/form-n244-application-notice>

7. If the Court decides that further evidence is needed from any party, it may set strict deadlines by which that evidence must be filed. Both parties should be aware that the Court may restrict the use of evidence which is filed late or impose other penalties for non-compliance.

SCHEDULE B – STEPS TO BRING MATTER TO TRIAL

If, in accordance with paragraph 14 above, any Defendant or other person affected by this Order wishes to apply bring the Claimants' proceedings (whether as a whole or in part) to final trial, to ensure effective case management by the Court the following steps must be followed:

1. If not already so, the person must apply to become a named defendant to the claim. This can be done by filing with the court (i.e. send to the court) and serving (i.e. send to the Claimants)

(a) An N244 Application form²; and

(b) a short statement explaining the reason for applying to become a named defendant (i.e. in order to contest the Claimants' claim).

2. In order to file the above with the Court, the person who is applying should:

(a) Send physical copies to the address at paragraph 19 of this Order; and/or

(b) Speak to the Court to obtain an address to send electronic copies to.

3. In order to serve the above on the Claimants, the person applying should:

(a) Send physical copies to the address at paragraph 21 of this Order; and/or

(b) Send electronic copies to the to the e-mail address at paragraph 21 above.

4. The person seeking to contest the Order and bring the matter to trial must then file and serve (see above as to how this is to be done):

(a) An Acknowledgement of Service using form N210³, explaining the reasons for contesting the Order (whether as a whole or in part), which must include a postal address for service together with (if they wish to be served with documents electronically in these proceedings) an email address to which such service may be effected;

(b) An application for permission to contest the Order and to bring the matter to trial, which explains clearly the differences between their grounds of defence relied upon and the issues which the Court has already adjudicated upon when granting this Order on . The Claimants shall obtain a transcript of the judgment which shall be available on the dedicated pages of their websites;

(c) A written Defence responding to the allegations set out in the Particulars of Claim (to the extent in the Defendant's knowledge); and

(d) A witness statement(s) (verified by a statement of truth) containing and/or appending all the evidence to be relied upon in support of the application for permission and Defence (i.e. evidence explaining the basis for contesting the claim).

² See the following link which provides a digital version of the form, and guidance notes:

<https://www.gov.uk/government/publications/form-n244-application-notice>

³ <https://www.gov.uk/government/publications/form-n210-acknowledgment-of-service-cpr-part-8>

5. Thereafter the Claimants shall have 14 days after service of the Defence to file and serve any evidence in reply.

6. The Court shall then list a hearing date for a Case Management Conference, at which it will:

(a) determine the application for permission to contest the Order and to bring the matter to trial; and

(b) should the application for permission be successful, give directions to parties for any further steps required prior to the final trial (such as filing further evidence). The Court may set strict deadlines by which the further steps must be taken and both parties should be aware that the Court may restrict the use of evidence which is filed late or impose other penalties for non-compliance.

7. Further:

- a. The Claimants shall prepare an electronic hearing bundle for the hearing and provide the Defendant(s) with access to the bundle not less than 14 days before the hearing.
- b. At the hearing, the Court shall consider whether injunctive relief shall be continued against any or all of the Defendants, whether on an interim or final basis.
- c. Any further application by the Claimants to add further named defendants, to have final relief granted against any Defendant(s) without trial pursuant to CPR r.3.5 and/or otherwise to amend its claim shall be determined at the hearing.
- d. The need for and form of any further case management directions through to trial or any further hearing shall be considered.

SCHEDULE C – USEFUL REFERENCES AND RESOURCES

The attention of all parties is drawn to the following references and resources:

Bar Pro Bono Unit – A possible avenue for obtaining free legal advice and/or representation:

<https://weareadvocate.org.uk/>

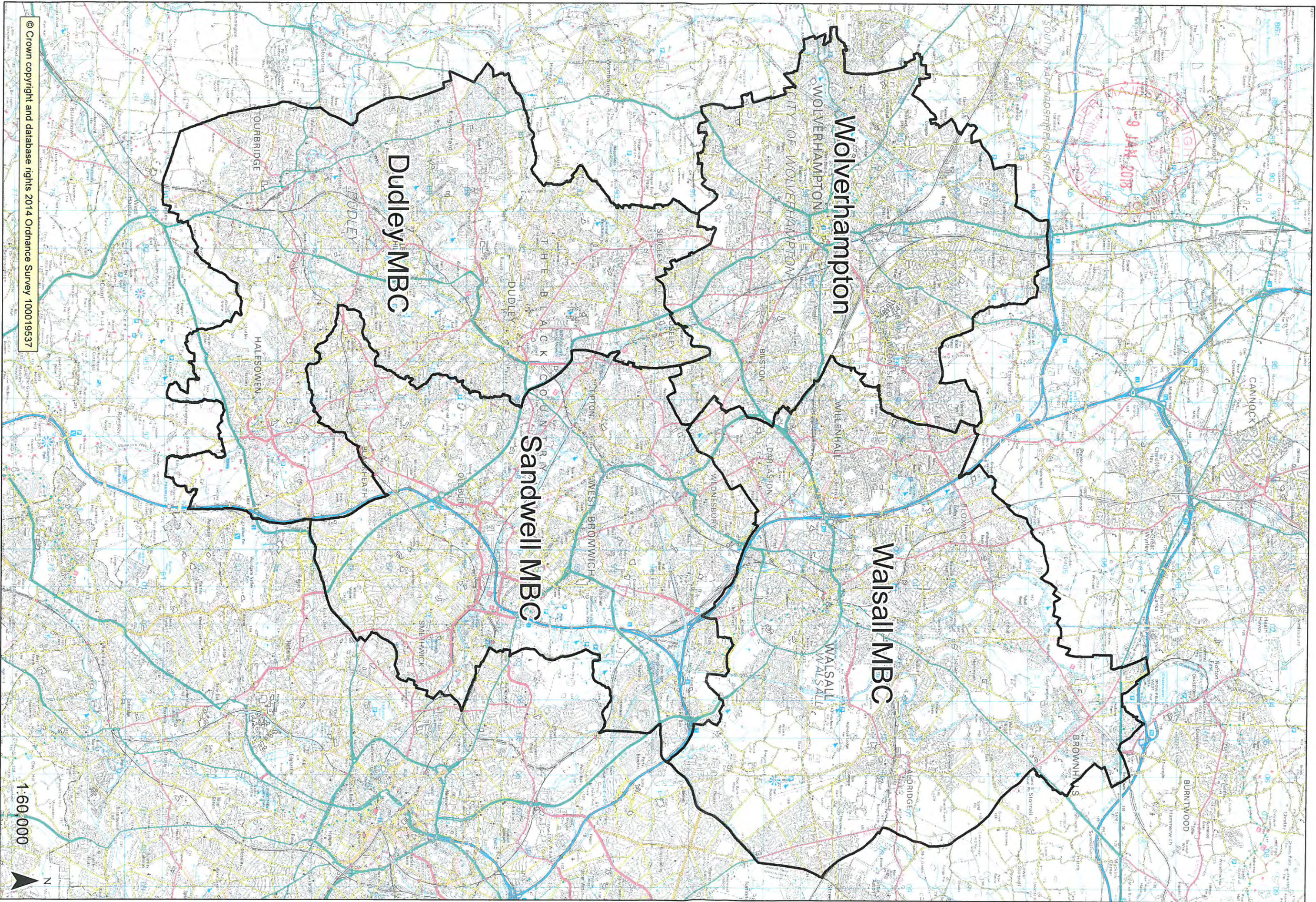
Support Through Court (formerly Personal Support Unit) – An organisation supporting litigants in person: <https://www.supportthroughcourt.org>

King's Bench Division Guide: <https://www.judiciary.uk/guidance-and-resources/kings-bench-division-guide-2022-2/>

A Handbook for for Litigants in Person: <https://www.judiciary.uk/guidance-and-resources/handbook-litigants-person-civil-221013>

Civil Procedure Rules Part 8: <https://www.justice.gov.uk/courts/procedurerules/civil/rules/part08>

Help with Court Fees website: <https://www.gov.uk/get-help-with-court-fees>



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
(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

**INJUNCTION - SECTION 37(1) SENIOR COURTS ACT 1981
(PROCEEDINGS BROUGHT PURSUANT TO SECTION 222 LOCAL GOVERNMENT ACT 1972)**

POWER OF ARREST

Under section 27 Police and Criminal Justice Act 2006

SEAL

The court orders that a power of arrest under section 27 Police and Criminal Justice Act 2006 applies to the following paragraph(s) of an order made on

WOLVERHAMPTON CITY COUNCIL & OTHERS v PERSONS UNKNOWN

(Here set out the provisions of the order to which this power of arrest applies and no others).

(Where marked * delete as appropriate)

2. **IT IS FORBIDDEN for the Defendants to participate between the hours of 3:00 p.m. and 7:00 a.m. 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.**
3. **IT IS ALSO FORBIDDEN for the Defendants to participate between the hours of 3:00 p.m. and 7:00 a.m. 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**

“Stunts” are driving manoeuvres often undertaken at such gatherings including but not limited to:

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

**POWER OF
ARREST**

In respect of a power of arrest under section 27 Police and Criminal Justice Act 2006, the Court, upon being satisfied pursuant to section 27(3) Police and Criminal Justice Act 2006 that the relevant conduct consists of or includes the use or threatened use of violence and/or there is a significant risk of harm to a person mentioned in section 27(2) of the said Act, has ordered that a power of arrest be attached to the order.

A power of arrest is attached to the order whereby any constable may (under the power given by Section 27(4) Police and Criminal Justice Act 2006) arrest without a warrant a person whom he has reasonable cause for suspecting to be in breach of any of the provisions set out in this order or otherwise in contempt of court in relation to such provision.

**This Power of
Arrest**

Shall come into effect on 12.01 a.m. (00:01 hours) on _____ and shall continue until 11:59 pm (23:59 hours) on _____, unless it is extended, varied or discharged by further order of the court.

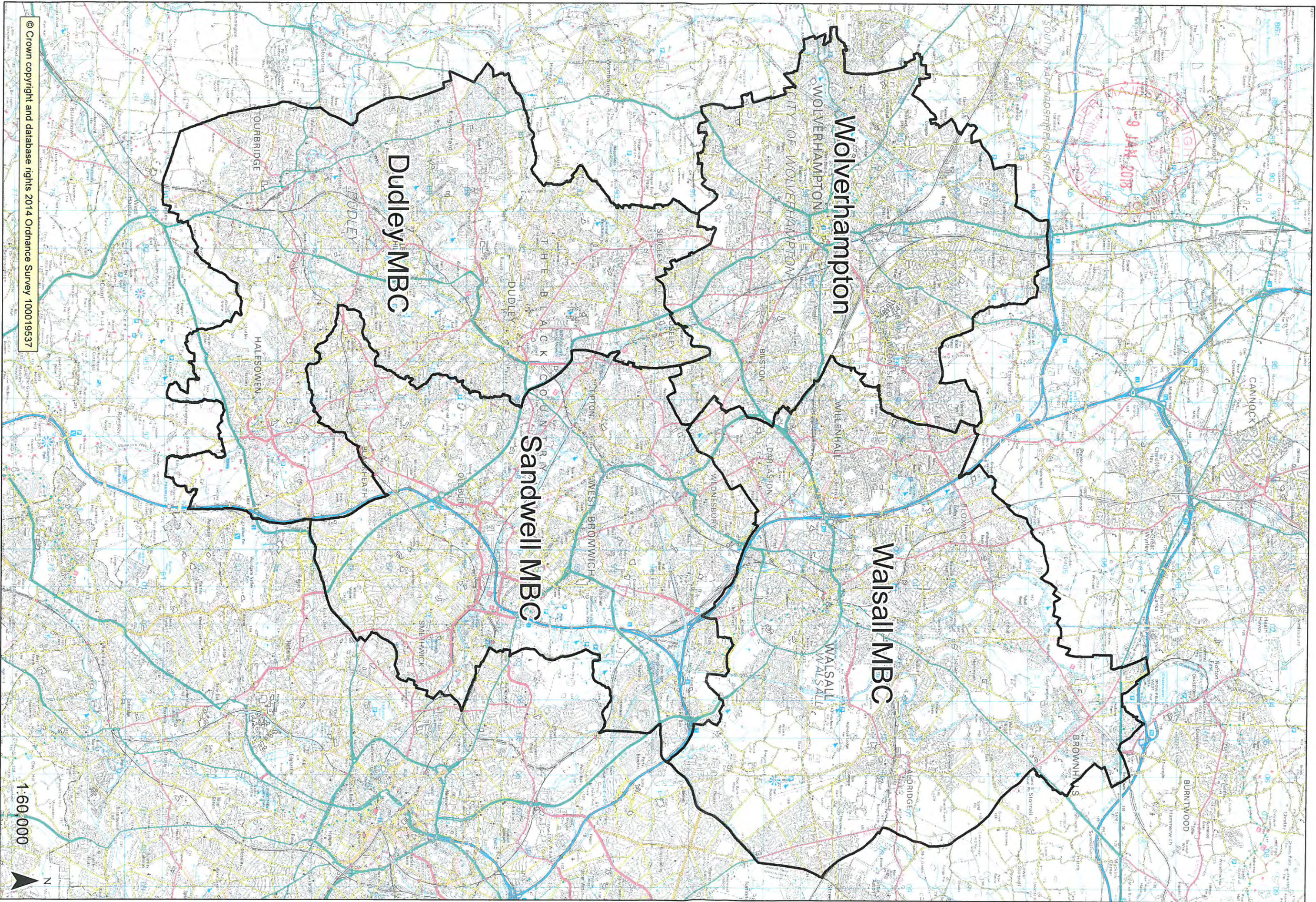
**Note to the
Arresting Officer**

Where a person is arrested under the power given by section 27(4) Police and Criminal Justice Act 2006, section 27(6) Police and Criminal Justice Act 2006 requires that:

- A constable shall, after making such an arrest, forthwith inform the person on whose application the injunction was granted;
- Such person shall be brought before the relevant judge within 24 hours beginning at the time of his arrest; And if the matter is not then disposed of forthwith, the Judge may remand such person.
- Nothing in section 155 authorises the detention of such person after the expiry of the period of 24 hours beginning at the time of his arrest, unless remanded by the court.
- In reckoning any period of 24 hours for these purposes, no account shall be taken of Christmas Day, Good Friday or any Sunday.

Ordered by

On



© Crown copyright and database rights 2014 Ordnance Survey 100019537

1:60,000



Application notice

For help in completing this form please read the notes for guidance form N244Notes.

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Name of court High Court of Justice	Claim no.
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)
PBA0082797	H W F – <input type="text"/> <input type="text"/> <input type="text"/> – <input type="text"/> <input type="text"/> <input type="text"/>
Warrant no. (if applicable)	
Claimant's name (including ref.) WOLVERHAMPTON CITY COUNCIL & OTHERS (LIT/AS/LIJ017753P)	
Defendant's name (including ref.) PERSONS UNKNOWN	
Date	07 October 2022

1. What is your name or, if you are a legal representative, the name of your firm?

WOLVERHAMPTON CITY COUNCIL

2. Are you a ☐ Claimant ☐ Defendant ☒ Legal Representative
☐ Other (please specify)

If you are a legal representative whom do you represent?

The Claimants

3. What order are you asking the court to make and why?

Pursuant to CPR rules 6.15 and 6.27, the Claimants invite the Court to make an order that they be permitted to serve their application for injunction to restrain street racing and associated activities within the Black Country area (which the Claimants further invite the court to reinforce with a power of arrest) by means of alternative service as specified in the draft order attached hereto.

4. Have you attached a draft of the order you are applying for? ☒ Yes ☐ No

5. How do you want to have this application dealt with? ☒ at a hearing ☐ without a hearing
☐ at a remote hearing

6. How long do you think the hearing will last? 1 Hours 30 Minutes
 Is this time estimate agreed by all parties? ☐ Yes ☒ No

7. Give details of any fixed trial date or period

None

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

Persons Unknown

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

10. What information will you be relying on, in support of your application?

- ☒ the attached witness statement
- ☒ the statement of case
- ☒ the evidence set out in the box below

If necessary, please continue on a separate sheet.

1. The Claimants seek an order pursuant to rules 6.15 and 6.27 of the Civil Procedure Rules that they be permitted to serve the claim form, application for injunction to restrain street racing and associated activities within the Black Country area (which the Claimants further invite the court to reinforce with a power of arrest) together with supporting evidence (hereinafter referred to together as the "Injunction Application", by means of alternative service as specified in the draft order attached hereto.

2. The Claimants also respectfully invite the Court to make any directions it sees fit regarding the Injunction Application prior to the substantive hearing of the same which the Claimants respectfully invite the Court to list with a time estimate of 1 day.

3. At the substantive hearing in respect of the Injunction Application, the Claimants will further respectfully invite the Court to make an order that, pursuant to rule 81.8 of the Civil Procedure Rules, they be permitted to serve any injunction and power of arrest granted by the alternative methods of service specified within the draft order for Injunction.

4. The Claimants respectfully draw the honourable Court's attention to the witness statement of Paul Brown, Communications Manager of Wolverhampton City Council, dated 7 October 2022 appended hereto. This statement details the steps the Claimants propose to take in order to effect substituted service of the Injunction Application on "Persons Unknown".

5. The Claimants further respectfully draw the honourable Court's attention to the witness statement of Paul Brown, Communications Manager of Wolverhampton City Council, dated 16 September 2022 and the Communications Plan exhibited thereto which appears at page B225 et seq. of the bundle of documents filed by the Claimants in support of their Injunction Application. This statement details the steps the Claimants propose to take not only in respect of serving notice of the Injunction Application on Persons Unknown, but also details the steps the Claimants propose to take to effect service of any injunction and power of arrest the Court may decide to grant at any substantive hearing of the Injunction Application.

6. The Claimants will respectfully contend that, regionally and nationally, there is a very wide interest in street racing and associated activities. The pool of people who choose to participate in, spectate at or organise street racing events is thus immeasurable and can never be fully known to the police and local authorities. Similarly, those people who choose to participate in, spectate at or organise street racing events, whether on a pre-determined or impromptu basis varies hugely from event to event. The Claimants respectfully aver it is wholly impossible, therefore, to identify named individuals and why the Claimants have, in their respectful contentions, necessarily sought this Injunction Application against Persons Unknown (as further defined in the action title).

7. The Claimants will aver that any injunction and power of arrest the court may grant, together with notice of the Injunction Application and the Injunction Application itself, is likely to reach the attention of Persons Unknown by the extensive methods prescribed in the witness statements of Paul Brown, referred to above, and by the methods provided in the draft order permitting alternative service of the Claim form appended hereto and further by the methods provided in the draft order for injunction itself which appears within Part A of the bundle of documents filed by the Claimants in support of their Injunction Application.

8. The Claimants thus respectfully invite the honourable Court to grant an order permitting alternative service as set out in the terms of the draft order permitting alternative service as appended to this application, or in such terms as the honourable Court deems fit.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

☐ Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.


☒ No

Statement of Truth

I understand that proceedings for contempt of court may be brought against a person 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.

- ☐ I **believe** that the facts stated in section 10 (and any continuation sheets) are true.
- ☒ **The applicant believes** that the facts stated in section 10 (and any continuation sheets) are true. **I am authorised** by the applicant to sign this statement.

Signature



- ☐ Applicant
- ☐ Litigation friend (where applicant is a child or a Protected Party)
- ☒ Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
07	10	2022

Full name

ADAM JAMES RICHARD SHEEN

Name of applicant's legal representative's firm

WOLVERHAMPTON CITY COUNCIL

If signing on behalf of firm or company give position or office held

SENIOR SOLICITOR-ADVOCATE (CIVIL & CRIMINAL)

Applicant's address to which documents should be sent.

Building and street

Wolverhampton City Council, Civic Centre

Second line of address

St Peter's Square

Town or city

Wolverhampton

County (optional)

West Midlands

Postcode

W	V	1		1	R	G
---	---	---	--	---	---	---

If applicable

Phone number

01902 556556

Fax phone number

--

DX number

744350 Wolverhampton 27

Your Ref.

LIT/AS/LIJ017753P

Email

litigation@wolverhampton.gov.uk

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

Claim No.

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

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)

Defendants

draft ORDER

Before sitting, at the High Court of Justice, Birmingham District Registry, Priory Courts, 33 Bull Street, Birmingham, B4 6DS on

Upon the Claimants' application, by an Application Notice dated , for directions and approving service in respect of the Claim Form, the Claimant's Application and the evidence in support by alternative means pursuant to CPR r. 6.15 and r. 6.27

And upon reading the witness statement of Paul Brown dated 07 October 2022 filed in support of this application.

And upon the Claimants confirming that any Order in these proceedings is not intended to prohibit lawful motorsport taking place on private land where planning permission has been granted and such activities take place

And upon hearing Counsel for the Claimant at a hearing without notice to the Defendants

And upon it appearing to the court that there is good reason to authorise service by a method or place not otherwise permitted by CPR Part 6

IT IS ORDERED THAT

Definitions

1 In this Order the following definitions have been applied:

(1) "the Documents"

- (a) Notice of Hearing and a sealed copy of this Order
- (b) Part 8 Claim Form;
- (c) Particulars of Claim
- (d) N16A application for an Injunction;
- (e) Draft Injunction Order
- (f) Draft Power of Arrest

(2) "the Evidence" materials set out at Schedule A below

(3) "the Claimants' contact details":

FAO: Black Country Car Cruise

Legal Services
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG
E: litigation@wolverhampton.gov.uk
T: 01902 556556
DX: 744350 Wolverhampton 27
Ref: LIT/AS/LIJ017753P

Directions for Service

2 Pursuant to CPR r. 6.15 & r. 6.27 the Claimant has permission to serve the Documents and the Evidence on the Defendants by the alternative means set out at paragraphs 2(1) to 2(5) below

- (1) Issuing a media release stating that a High Court Injunction and Power of Arrest have been applied for.

Such release must provide:

- (a) Details of the application and summarise the orders sought;
- (b) The deadline for filing an acknowledgement of service;
- (c) The date, time and location of the hearing of the application;
- (d) The addresses of the dedicated webpages maintained by the Claimants regarding car cruising;
- (e) The Claimants' contact details;
- (f) Details of where and how copies of the Documents and the Evidence may be obtained.

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

within three working days of receipt of the sealed order from the court

- (2) Placing on the Claimants' social media including Twitter and Facebook links to the above media release regarding the application to the High Court for an injunction and power of arrest

within three working days of receipt of the sealed order from the court

- (3) Updating the dedicated pages on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council and Walsall Council about the application to the High Court for an injunction and power of arrest

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

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

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

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

Such pages shall carry a direct link to:

- (a) The Documents;
- (b) The Evidence;
- (c) A Sealed copy of this order.

within four working days of receipt of the sealed order from the court

(4) Uploading to the video sharing website "You Tube", and the Claimants' websites and social media pages (Twitter and Facebook) a video outlining:

- (a) The nature of the application and summarising the orders sought;
- (b) The deadline for filing an acknowledgement of service;
- (c) The date, time and location of the hearing of the application;
- (d) The Claimant's contact details;
- (e) The addresses of the dedicated webpages maintained by the Claimants regarding car cruising;
- (f) Details of where and how copies of the Documents and the Evidence may be obtained.

Items (d) and (e) shall appear on screen as text.

within seven working days of receipt of the sealed order from the court

(5) Ensuring that copies of the Documents and the Evidence are available at the front desks of the Claimants' main offices.

within three working days of receipt of the sealed order from the court

3 The Documents and Evidence shall be deemed served on the Defendants at 23.59 on the date upon which the final step in paragraph 2 has been complied with.

- 4 The Claimants shall file a witness statement confirming that the steps taken to effect service set out at paragraph 2, within 14 days of the final step being taken.
- 5 Any person who wishes to appear at the hearing must file and serve on the Claimants an Acknowledgment of Service no later than 4pm on **18 November 2022**.
- 6 The Claimants' may file any updating evidence by no later than 4pm on **2 December 2022**.
- 7 The matter shall be listed for hearing before a High Court Judge (s.9 if practicable) with a time estimate of 1 day on **[date to be listed by the Honourable Court]** .
- 8 Costs in the case.

SCHEDULE A

Please see Attached Index to Bundle for Injunction Application (Parts B, C, D, E, F and G).

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 3:00 P.M. AND 7:00 A.M. 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 3:00 P.M. AND 7:00 A.M. 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 3:00 P.M. AND 7:00 A.M. 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)

Respondents

BUNDLE OF EVIDENCE IN SUPPORT OF APPLICATION FOR AN INJUNCTION

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For: Claimants
Statement of: Paul
Brown
Statement no: 1
Exhibits: None.
Date: 07 October 2022

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

CLAIM NO:

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 PAUL BROWN

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

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief.
2. Further to my previous statement which I understand appears at page B225 et seq. of the bundle of the documents which the Claimants will file and serve in support of their application for an injunction to restrain street racing, dangerous driving and associated activities within the Black Country area, and in collaboration with my colleagues Pardip Nagra (ASB Team Leader) and Adam Sheen (Senior Solicitor, Legal Services), a Communications Plan has been developed which details the steps which the applicants propose are to be taken to bring notice of the application for an injunction to the attention of "persons unknown" engaging in street racing, dangerous driving and associated activities, members of the public and to any persons that may be affected by the application within the Black Country Area. This communications plan appears as an exhibit to my previous statement in this application.
3. This statement deals with "general communication" – that is, the proposed steps to be taken in the spheres of traditional media, social media and signage, in respect of the application to prohibit street racing.
4. I am aware that the Four Black Country Borough Councils (Dudley, Sandwell, Walsall and Wolverhampton) intend to apply to the honourable court for permission to serve notice of the application for an injunction to restrain street racing and related activities in the Black Country by alternative means of service. Essentially, by undertaking a carefully orchestrated publicity campaign (as planned in detail in the Communications Plan exhibited to my previous

statement in this matter) the Claimants will respectfully contend that fulfilling the steps in the publicity campaign (as set out in the Communications Plan exhibited to my previous statement), this brings adequate notice of the intended injunction application to the attention of Persons Unknown who may be affected by the Injunction (in essence such persons who may fall within one of the three categories of "Persons Unknown" Defendant cited in the headings to this witness statement). On the back of this campaign, I understand the Claimants will argue any "person unknown" who may wish to become involved in these proceedings has adequate and ample opportunity.

5. I am aware that on that premise, the Claimants will respectfully invite the court to dispense with the requirements to serve this application on Persons Unknown personally, something which I understand is normally the requirement for applications for injunctions. I further understand the essence of the Claimants' respectful contentions in this regard will be that the Communications Plan not only more than brings notice of the application to the attention of Persons Unknown, but that personal service of the same on Persons Unknown would be impracticable in any event.
6. I understand that in support of their application for alternative service of the notice of their injunction application, the Claimants must set out a detailed set of steps that they must fulfill in order to have brought notice of the application to the attention of Persons Unknown adequately. These steps must be clearly and precisely defined and set out minimal requirements which must be evidenced as clearly fulfilled in order to have adequately brought notice of the application to the attention of Persons Unknown to fulfil the requirements of having served notice of the application by alternative means.
7. Essentially, in considering and setting requisite steps to be fulfilled to bring notice of the application for injunction to the attention of Persons Unknown who may be affected by the injunction if the honourable court is minded to grant the same, it was necessary to devise steps which would likely reach all such persons. The categories of Persons Unknown (as cited as Defendants in the headings to this witness statement) are clearly broadly defined. Methods of

service of this application on persons unknown I felt needed to be necessarily broad to achieve this objective. This I felt, needed to encompass, traditional media (the written press, television and radio), and social media. It was also necessary that steps were devised to bring notice of the application to any Person Unknown with literacy difficulties adequately. That is why, for example, I understand the Claimants are keen that there be YouTube videos of details of the application, the draft injunction before the Court and details of any hearing being read out together with details of how people can apply to become parties to the injunction application and so forth if they are so minded.

8. The Communications Plan is based on a minimum set of steps the Claimants say they need to fulfil to bring notice of the application for injunction to the attention of Persons Unknown. The Plan itself necessarily goes "over and above" these minimum steps to ensure that when all steps are complete more than adequate service of notice of this application on Persons Unknown has been effected. Whilst the Communications Plan sets out more than the minimum steps the Claimants will contend the following minimum steps are required.

- a. Issuing a media release stating that a High Court Injunction and Power of Arrest have been applied for.

Such release must provide:

- i. Details of the application and summarise the orders sought;
- ii. The deadline for filing an acknowledgement of service;
- iii. The date, time and location of the hearing of the application;
- iv. The addresses of the dedicated webpages maintained by the Claimants regarding car cruising;
- v. The Claimants' contact details;
- vi. Details of where and how copies of the Documents and the Evidence may be obtained.

Such release shall be made to, but is not limited to, local print publications including the Express and Star Chronicle Week, the Birmingham Mail, Halesowen & Dudley News and Stourbridge News; local radio stations

including BBC WM, Free Radio, Signal 107, WCR FM and Heart, and BBC Midlands Today and ITV Central.

I confirm the Claimants have set themselves a deadline for this being within three working days of receipt of the sealed order from the court

- b. Placing on the Claimants' social media including Twitter and Facebook links to the above media release regarding the application to the High Court for an injunction and power of arrest

I confirm the Claimants have set themselves a deadline for this being within three working days of receipt of the sealed order from the court

- c. Updating the dedicated pages on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council and Walsall Council about the application to the High Court for an injunction and power of arrest

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

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

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

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

Such pages shall carry a direct link to:

- i. The Documents;
- ii. The Evidence;
- iii. A Sealed copy of this order.

I confirm the Claimants have set themselves a deadline for this being within three working days of receipt of the sealed order from the court

- d. Uploading to the video sharing website "You Tube", and the Claimants' websites and social media pages (Twitter and Facebook) a video outlining:
 - i. The nature of the application and summarising the orders sought;
 - ii. The deadline for filing an acknowledgement of service;
 - iii. The date, time and location of the hearing of the application;
 - iv. The Claimant's contact details;
 - v. The addresses of the dedicated webpages maintained by the Claimants regarding car cruising;

- vi. Details of where and how copies of the Documents and the Evidence may be obtained.

Items (d) and (e) shall appear on screen as text.

I confirm the Claimants have set themselves a deadline for this being within seven working days of receipt of the sealed order from the court

- e. Ensuring that copies of the Documents and the Evidence are available at the front desks of the Claimants' main offices.

I confirm the Claimant have set themselves a deadline for this being within three working days of receipt of the sealed order from the court.

- f. Public notice in the Express & Star detailing the application to the High Court.

I confirm the Claimants have set themselves a deadline for this being within seven working days of receipt of the sealed order from the court.

- 9. I confirm that I will link with my counterparts in each of Dudley, Sandwell and Walsall Metropolitan Borough Councils and West Midlands Police to ensure that the steps above are effected across the entirety of the Black Country.

- 10. As Communications Manager for Wolverhampton City Council, the lead authority in this application, I will take responsibility for ensuring the steps outlined above, and in the communications plan exhibited to my previous statement, are adequately fulfilled. If for any reason I am unable to communicate any of the steps outlined in this statement, a member of the council's communications team will carry out this work in my absence. It is also my intention to monitor progress of the fulfillment of the Communications Plan and steps the honourable court deems necessary to bring notice of this application to the attention of Persons Unknown and make a subsequent statement to be filed within the honourable court at a later date evidencing that all steps required to be fulfilled to serve notice of this application on Persons Unknown have been fulfilled as soon as practicable after completion of those steps.

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

07 October
2022

Print name in full PAUL STEVEN BROWN

B. SECTION B - Global Overarching Statements

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

CLAIM NO:

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 3:00 P.M.
AND 7:00 A.M. IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK
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PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER
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COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR
EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR
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DRIVING**

**3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY
MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00 P.M.
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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)**

Respondents

WITNESS STATEMENT OF ADAM SHEEN

1. My name is Adam James Richard Sheen. I am a practising Solicitor-Advocate (Civil and Criminal) employed by Wolverhampton City Council within the Litigation Team of the Council's Legal Services Team. I qualified as a solicitor in September 2005 and gained my Higher Courts (Civil Advocacy) and Higher Courts (Criminal Advocacy) qualifications in 2013 and 2014 respectively. I have been employed by Wolverhampton City Council Legal Services since February 2007.
2. My role comprises, amongst other things, advising and representing various departments of the Council, and its arm's length management organisation, in a broad array of litigious matters. A particular focus of my work concerns litigation involving seeking legal remedies to tackle alleged anti-social behaviour.
3. I make this statement from my own knowledge, except where otherwise stated, and after considering relevant information held by the Claimants, as well as making all due and proper enquiries of the Claimants' employees, servants or agents.
4. I am the solicitor with day-to-day conduct of a joint application brought by Wolverhampton City Council, Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council and Walsall Metropolitan Borough Council (together referred to as the "Black Country Councils"), for injunctive relief to restrain the activities of street racing and associated dangerous driving activities within the entirety of the combined local government area for which the Black Country Borough Councils are jointly responsible.
5. Many of the witness statements included in the bundle of documents supporting this application were obtained before the death of Her Majesty Queen Elizabeth II on 08 September 2022 and hence these statements were made under the heading "in the High Court of Justice Queen's Bench Division". Notwithstanding the immediate change in the title of the Queen's Bench Division to the King's Bench Division on the death of Her Majesty, and the death of Her Majesty occurring prior to this action being commenced by issuing the same at court, the Claimants will respectfully contend any reference within the witness statements to the "High Court of Justice Queen's Bench Division" should henceforth be read as in the "High Court of Justice King's Bench Division".
6. In a similar vein to paragraph 5 above, I note that many of the witness statements included in the bundle of documents supporting the Claimants' application for injunctive relief were taken before the action title (and descriptions of the proposed *persons unknown* were finalised) which is why such statements simply bear the description "Persons Unknown". The Claimants will thus respectfully contend any reference within the witness statements to "Persons Unknown", or "Persons Unknown Engaging in Dangerous Driving and Associated Activities". should henceforth be read as:

“1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00 P.M. AND 7:00 A.M. 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 3:00 P.M. AND 7:00 A.M. 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 3:00 P.M. AND 7:00 A.M. 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)”.

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

04 October 2022

Print name in full ADAM JAMES RICHARD SHEEN

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

WITNESS STATEMENT OF PARDIP NAGRA

I, Pardip Nagra, on behalf of Wolverhampton City Council, WILL SAY AS FOLLOWS:

1. I am Pardip Nagra and I am employed as Team Leader for Wolverhampton Anti-social Behaviour Team (ASBT), employed by Wolverhampton Homes. I have held this position since April 2013.
2. This injunction application is a joint enterprise and, so far as I make representations on matters solely affecting the other local authority areas of Dudley, Sandwell and Walsall, I confirm I have discussed these representations with my counterparts in the other authorities and they have confirmed the same as accurate.

Background to previous injunction granted which was in place from 2 February 2015 to 1 February 2021

3. I am aware of proceedings in relation to an injunction application that was made to the High Court in 2014 which saw the four Black Country Councils (Dudley, Sandwell, Walsall and Wolverhampton) seeking an injunction to prevent “car cruising” across the four local authority areas. The previous injunction was granted by His Honour Judge Owen QC, sitting as a high court judge, on 1 December 2014 and came into force on 2 February 2015. An application to extend the injunction for a further three years was granted on 9 January 2018 by His Honour Judge McKenna. The injunction lapsed on 1 February 2021. My former colleague and line manager, Joanne Mason, was the co-ordinating officer for the preparation and collation of evidence across the four areas.
4. In 2014, adopting the terminology from other injunctions restraining car cruising, His Honour Judge Owen QC explained “car cruising” as:

“Car cruises are ... in essence... events [which] attract the drivers of cars, including what are colloquially known as ‘Boy Racers’ who show off to crowds of ‘car cruise’ supporters by racing their cars and performing driving stunts and timed trials. The vehicles that are used include high performance cars and cars which have been modified in terms of their power. The activities in which drivers engage are noisy, dangerous and illegal, obstructing highways and the premises bordering them, damaging property and putting spectators or other road users at risk of injury or worse. They attract those to whom such anti-social behaviour is an excuse, if they need one, for other types of anti-social behaviour, including the harassment and intimidation of law abiding citizens, the threatening and abuse of those who challenge them and the activities in which they are engaging, the use of foul language and the misuse of drugs. By its very nature, those attending car cruising events, whether as drivers, passengers or spectators, will vary from day-to-day and event-to-event. However, the total number of attendees will regularly run into several hundred people. They are attracted by advertising on the internet and in magazines as well as word of mouth.
5. As described in the evidence presented to the court in 2014 at the original injunction application hearing, car cruising had been a regular bone of contention with local residents, motorists and businesses in areas in the Black Country for many years.

6. From the evidence gathered for the 2015 injunction application, Joanne Mason noted that the activity of car cruising is noisy, dangerous and illegal, obstructing highways and the premises bordering them, damaging property and puts spectators or other road users at risk of injury or worse. The noise of revving engines, car horns, racing cars and spectators frequently disturbs local residents who are trying to sleep as well as those conducting commercial business.
7. Huge numbers of spectators gather to watch the car cruising and children are often present amongst these spectator groups. Rowdy behaviour, shouting, foul language, criminal damage and littering are often a by-product of the car cruises.
8. As outlined in the evidence presented to the High Court in 2014, in the Black Country area these gatherings involved a large number of car cruisers who regularly raced their vehicles along the Black Country Route and Black Country New Road as well as other roads and areas in Dudley, Walsall, Sandwell, and Wolverhampton. The activity typically occurred on Sunday evenings and, on occasions, as many as 250 vehicles were witnessed participating in these car cruises with huge crowds of spectators lining 'the route'.
9. During 2013 and 2014, Joanne Mason was provided with over 100 witness statements from members of the public who were complaining about the car cruising. These witness statements were provided to the court with the bundle of documents filed in support of the application in 2014 for an injunction to prevent car cruising in the Black Country area.
10. I do not intend to trouble the court to read through all the original 2013/14 statements; instead, in this statement I will make reference to a small sample of witness statements in order to provide the Honourable Judge with some context as to the nature and scale of the car cruising issue that led to the original application to the High Court in 2014. Outlined below is a summary of the negative impact car cruising was having on residents living in the affected areas prior to the original injunction being granted in 2014. Also detailed below is the impact the activity was having on police resources at the time.

Victim impact on residents; noise/sleep deprivation, harassment, fear, intimidation, nuisance, obstruction, dangerous driving and risk of harm prior to 2015 injunction

Noise/sleep deprivation

11. From the large number of witness statements provided by members of the public during 2013 and 2014, it was clear that car cruising activity was having a significant detrimental impact on local residents. Residents were continually subjected to loud levels of noise nuisance from engines (that had often been modified resulting in increased noise levels) being revved, cars being raced around as well as loud music from car stereos and shouting from spectators who lined the route.
12. Prior to the previous injunction coming into force in February 2015, it was reported that car cruising activity often started on Sunday evenings and went on until the early hours of Monday mornings. Many residents reported sleep deprivation because of the noise which they said impacted on their performance at work the following day.
13. During 2013/14 in Walsall:
 - In their witness statements, residents in the Brickyard Lane area of Walsall complained about the noise from revving of engines, loud music and shouting by the car cruisers and spectators which disturbed residents' sleep and detrimentally impacted on their quality of life.
 - Residents living in Walsall town centre reported noise from gatherings of car cruisers on Tesco car park. The residents complained of disturbed sleep from the screeching tyres, speeding vehicles and loud music.
 - In the Moxley area, residents regularly complained about the car cruisers who congregated on the Aldi car park. Residents living nearby stated that the revving of engines and cars being raced disturbed their sleep.
 - Residents reported large gatherings of vehicles on the Maybrook industrial estate in Walsall which proceeded to race each other along Brownhills Road. They complained about the noise of revving engines, screeching tyres, vehicles backfiring, all of which resulted in residents not being able to sleep because of the noise.

14. During 2013/14 in Wolverhampton:
- Residents living in the Sedgemoor Park area of Wolverhampton complained about car cruising along the Black Country route near to their homes. They reported high levels of noise which deprived them and their families of sleep.
 - One witness, Lisa Fox, stated that it caused articles within her house to shake and vibrate. This information is provided in the witness statement of Lisa Fox (dated 29/7/14) that was filed in the 2014 application for an injunction and which is provided as **Exhibit PN1**.
 - Another witness, Jennifer Bateman, who lives in the Sedgemoor Park area told Joanne Mason that she went away almost every weekend, returning to her home on a Monday; she did this solely to escape from the noise because she knew she would not get any sleep if she stayed in her home. She reiterated this to my colleague Sarah White, who has since left the Wolverhampton Homes organisation, when she spoke to her for an updated statement in May 2022, with her advising that this was why she so strongly supported the re-application for an injunction.

Harassment, intimidation, fear and nuisance

15. Prior to the High Court granting the previous injunction, in 2013/2014 several members of the public complained about harassment and intimidation from drivers, passengers and spectators involved in car cruiser gatherings.
16. These reports included incidents in Sandwell where members of the public had been shouted at, sworn at, and on one occasion a passenger in one of the vehicles pulled his trousers down and exposed himself to passers-by. This particular incident is detailed in the witness statement of Peter James (dated 09/11/2013) paragraph 5, which is provided as **Exhibit PN2**.
17. On another occasion in 2013, residents of Brickyard Lane in Walsall reported they attempted to take the registration numbers of vehicles involved but were met with verbal abuse from the car cruisers. Details of this incident can be found in the witness statement of Carl Yeomans (dated 07/11/2013), paragraph 4 which is provided as **Exhibit PN3**.
18. As described in a witness statement of David Clarke, Health and Safety Co-ordinator of Johnson Controls (now called Adient), members of staff who were merely attempting to access their place of work, were subjected to verbal abuse – including derogatory sexual

comments to female employees – by ‘car cruisers’ obstructing access in and out of the plant. These incidents are detailed in the witness statement of David Clark (dated 12 March) paragraph 14, that was filed in the 2014 application for an injunction and is provided within **Exhibit PN4**.

Obstruction, dangerous driving and risk of harm

19. In 2013/2014, witnesses reported car cruisers approaching an island by Hallens Drive, Wednesbury driving at 60-70 mph. At that time residents and businesses reported that on Sunday evenings, Hallens Drive and surrounding roads were turned into a ‘race track’ by those involved in car cruising. It was said that the car cruisers sometimes used spray paint to write the word “START” on the highway.
20. On 18 May 2014, an officer from Wolverhampton City Council was travelling on her way to work when she noticed several markings on the road in Hallens Drive, Wednesbury, indicating the road had been used as a ‘race track’ the previous evening (Sunday). This Council employee, Lisa Parmar, provided a statement detailing what she had witnessed which is provided as **Exhibit PN5**.
21. In 2013/2014, members of the public reported car cruisers driving in convoy around a roundabout, doing several laps, and thus obstructing other drivers from accessing the roundabout. One witness reported approximately 25 cars doing this, each car carrying 3-4 people, all of whom were laughing at the chaos they were causing. This same witness reported one occupant of a vehicle pouring liquid onto the road surface from a passenger door, presumably to make the cars skid better. These particular incidents are detailed in the witness statement of Peter James (dated 09/11/2013) paragraph 2 – 4, which is provided as **Exhibit PN2**.
22. During 2013/2014, complaints were also being regularly received from local businesses about car cruising. The witness statements of David Clark, Health and Safety Co-ordinator of Johnson Controls (now called Adient) - one of the largest employers in Wednesbury (Sandwell) – detailed car cruisers obstructing access in and out of the plant, verbal abuse towards staff, and criminal damage to delivery vehicles. Not only did car cruising impact on production deadlines at Johnson Controls, because of the chemicals used in the production processes, it also posed a significant and wide-reaching health and safety risk to the general public should there have been a collision between a car cruiser and a delivery vehicle. These incidents are detailed in the two witness statements of David Clark

(dated 12 March 2014 and 17 July 2014) that were filed in the 2014 application for an injunction and are provided as **Exhibit PN4**.

23. In 2013/14, other residents stated they had curtailed their recreational activities. One witness said that she used to enjoy a Sunday evening walk with her partner along the A41 in Wednesbury. However, this stopped when she was shouted at in an aggressive manner by a passenger in one of the “boy racer” convoys. Details of this incident are provided in the witness statement of Lydia Pulford (dated 11/11/2013), paragraphs 5 and 6, which is provided as **Exhibit PN6**.
24. Another witness reported in 2013 how he used to enjoy fishing on Sundays on the canal at Hallens Drive in Wednesbury. However, because of the disruption caused by the car cruisers, including noise, dangerous driving and littering, he had stopped this recreational activity. Details of this matter are provided in the witness statement of Peter James (dated 09/11/13), paragraph 9, which is provided as **Exhibit PN2**.
25. Another witness who provided evidence in 2014, when the previous injunction was being sought, described inadvertently getting caught up in car cruising activity and having to pull her car over into SMA Car Auctions on the Black Country Route in Wolverhampton to escape. She described herself as “physically shaking and petrified from this experience which was frightening and horrid”. In her statement, she goes on to state; “This was a terrible experience which I do not want to go through again. I have been driving for 25 years and have never seen an incident like this before.” This information is provided in the witness statement of Fenella Bird (dated 23 November 2014) that was filed in the 2014 application for an injunction and is provided as **Exhibit PN7**.
26. In addition, several police officers provided witness statements to support the previous application. For example, on 10 March 2013 two cars were involved in a collision at Springvale Retail Park, Bilston, Wolverhampton; it was suspected that these cars had been involved in a street race that evening. This incident is detailed in the witness statement provided by PC Jonathon Harford, dated 16 November 2013 and is provided as **Exhibit PN8**.

Environmental impact, damage to businesses and economic loss to businesses prior to 2015 injunction

27. Prior to the 2015 injunction businesses in the Hallens Drive area of Wednesbury reported large volumes of litter left by the car cruisers and spectators which had a huge detrimental impact on the area.
28. As well as littering, residents and businesses in Brickyard Lane, Aldridge, reported those attending had been urinating in the porches of buildings, causing damage to buildings and fences, oil spillages and left behind debris from crashed vehicles. Cleaning of the surrounding area was a very costly exercise. Businesses in the Brickyard Lane area were paying thousands of pounds in repair bills, and they had also seen their insurance premiums increase significantly. The cost of replacing a crash barrier for one company in Brickyard Lane was £600. Prior to the 2015 injunction, car cruising was having a serious detrimental impact on business operations in the Brickyard Lane area. Details relating to this matter are explained in the witness statement of Richard Hardy (dated 06/11/2013) paragraph 13, which is provided as **Exhibit PN9**.
29. As outlined in paragraph 22, a company that operates in Hallens Drive is Adient (formerly Johnsons Controls) which is a multi-national company and one of the largest employers in Sandwell Borough. The plant operates 24 hours per day, 7 days per week. Prior to the 2015 injunction, most Sunday evenings, the Hallens Drive area of Wednesbury was 'transformed' into a 'race track' by car cruisers, with roads and gates to sites completely blocked. Because delivery vehicles were unable to get in and out of the plant, this caused significant delays to the production process; the consequence was that production deadlines were often missed which was costing the company money. Detail on this matter is contained in the witness statement of David Clark (dated 12/3/14), paragraph 17, which is provided as **Exhibit PN4**.
30. Other nearby business operations in the Hallens Drive area, for example Warburtons Bakery and the Ring and Ride service, were experiencing the same issues that were severely hampering their ability to run their operations. Witness statements to this effect were provided by employees of Warburtons and Ring and Ride in the application for the 2015 injunction.

Impact on police resources prior to 2015 injunction

31. At the injunction hearing in 2014, Inspector Julie Mason of West Midlands Police (now retired) provided a summary dealing with criminal behaviour and the impact the ongoing issue of car cruising was having on police resources, on medical resources and accident and emergency services. Inspector Mason's statement is provided as **Exhibit PN10**.

Evidence of effectiveness of the previous injunction prohibiting car cruising in the Black Country area (2 February 2015 to 1 February 2021) and the current situation.

32. Since the previous injunction came into force in February 2015, whilst evidence gathering for annual review hearings, Joanne Mason monitored reaction to the injunction. When speaking to many members of the public they told her that they were hugely relieved that the car cruising injunction was in place and that their quality of life had improved significantly.
33. As stated above, car cruising activity took place across all four of the Black Country local authority areas. I deliberately use the past tense here because since the previous injunction came into force in February 2015, following a carefully orchestrated extensive publicity campaign and effective 'policing' of the affected areas, I can report that on the whole, the injunction had a positive impact across the four Black Country Local Authority areas. The injunction significantly reduced the problem, although car cruising did not stop altogether.
34. In late 2020, prior to the application to renew the previous injunction being made to the High Court, in order to gauge the success of the injunction, Joanne Mason requested witness statements from members of the public and businesses across areas that had experienced problems with car cruisers at the time when the previous injunction was sought in 2014. Joanne also requested updates from the local authority lead officers as well as West Midlands Police. Following Joanne Mason's retirement in January 2022, once an agreement was made to make a new application for an injunction, my former colleague Sarah White also made enquiries with previous and new witnesses.

Wolverhampton

35. In late 2020, two residents living in the Ettingshall/Springvale area of Wolverhampton, who had previously suffered from the anti-social activity of car cruising, reported a significant reduction in car cruising since the injunction came into force.
36. However, in her witness statement, resident Lisa Fox, who lives in the Springvale area of Wolverhampton, stated that for three weeks during July and August 2020 she did see an increase in car cruising in her area; she goes on to state that this had since stopped. I understand the statement of Lisa Fox will be included in the bundle of documents available to the court filed in support of this application.
37. Similarly, in her witness statement, resident Rajbinder Kaur, who also lives in the Springvale area, also reported that since Covid-19 'lockdown' in March 2020, she had noticed there had been times when there had been noise from car cruising. I understand the statement of Rajbinder Kaur will be included in the bundle of documents available to the court filed in support of this application.
38. The most recent incident of car cruising that was subject to committal applications in Wolverhampton was in October 2018, and which concluded in May 2019. Following this incident, additional signage was placed in Springvale Avenue in Wolverhampton.
39. In 2021, Joanne Mason became aware of an incident that took place on 5 July 2020 on the Black Country New Road in Wolverhampton and onto Birmingham New Road towards Dudley. Police traffic officers were aware that car cruisers had gathered for a 'meet' on or near to Springvale Avenue in Wolverhampton. Police traffic officers, who were looking out for dangerous driving in relation to this car cruise 'meet', witnessed two vehicles that appeared to be racing each other.
40. I now refer to **Exhibit PN11** which is video footage recorded by West Midlands Police relating to the incident mentioned in paragraph 39 above. I now describe what can be seen on the footage.
- At sixteen seconds into the footage, it appears that two cars are racing each other along the Black Country Route/New Road; the police go in pursuit of the vehicles.
 - At thirty-six seconds into the footage, cars can be seen parked on the side of the road at the traffic island.

- During the pursuit, the police vehicle was travelling at 109 miles per hour trying to keep up with a Vauxhall Corsa when the driver refused to stop.
- Whilst being driven at high speed along Birmingham New Road, at one minute and thirty-four seconds into the footage, the Corsa can be seen veering across the dual carriageway and onto the wrong side of the road where it continued for a third of a mile.
- At one minute and thirty-eight seconds into the footage, an innocent driver who is attempting to turn right onto the dual carriageway can be seen to brake sharply to avoid a collision with the Corsa being driven on the wrong side of the road
- The Corsa then turns right off the dual carriageway and into a residential side street and continues to travel at high speed. Parked cars can be seen on the right-hand side of the road, meaning there was only enough room for one car to get through. Had another car come from the opposite direction, this may well have resulted in a serious collision.
- A police helicopter was deployed to the incident and was able to guide the police officers to enable them to block the Corsa.
- The driver, Anthony Barnes, was arrested, and it transpired that he only had a provisional driving licence and was not insured to drive the vehicle. Mr Barnes was subsequently charged, convicted, and given a six-month suspended prison sentence and banned from driving for two years.

41. Having viewed the footage of this incident, it is evident that the driving is extremely dangerous to other road users, pedestrians and to the police officers in pursuit. Furthermore, in my professional opinion, the gathering of parked vehicles adjacent to a traffic island in a known 'hotspot' location in the Springvale area of Wolverhampton, together with vehicles racing each other at speed, are the hallmarks of an organised car cruise 'meet'.

42. In August 2020, Councillor Celia Hibbert enquired with City of Wolverhampton Council regarding her concerns about speeding cars and motorbikes racing along the A449 Penn Road from the Rose and Crown pub into South Staffordshire. She provided an email received from a named resident who reported that the vehicles in question are mainly 'supercars' but that motorbikes were also part of the problem. This resident felt there was a pattern emerging, with incidents occurring on Thursdays, Fridays, Saturdays and Sundays, and asked that we imagine the noise being experienced. He called for a co-ordinated response to address this cruising and racing before a major incident occurred.

Joanne Mason then spoke to a different resident who works in the Penn area, who had made a recent report to West Midlands Police about two vehicles being seen pulling off a car park at high speed, driving in convoy.

43. On Saturday 17 April 2021 at 23:43 hours, Joanne Mason received an email from resident Lisa Fox who lives near the Black Country Route in Springvale, Wolverhampton, stating: "Hi Jo. Racing like mad at minute down black country route. Saturday 17th 23.30". On Monday 19 April 2021 at 08:55 hours, Joanne received a further email from Mrs Fox stating: "Hi Jo. They was racing again last night [Sunday 18 April 2021] around midnight.". I exhibit the emails from Mrs Fox as **Exhibit PN12**.
44. In April 2021, Mrs Rachel Fanthom who is an anti-social behaviour officer in Wolverhampton Anti-social Behaviour Team, provided a witness statement relating to an incident of car cruising she had witnessed the previous evening, Saturday 10 April 2021. In her witness statement, Mrs Fanthom describes that at 23:05 hours, as she was travelling from her home to McDonalds restaurant in Bilston, Wolverhampton, she observed groups of vehicles parked up at various locations along the Black Country Route in Springvale, Bilston, revving their engines. Mrs Fanthom states that as she drove along the Black Country Route towards Springvale Avenue, a green Audi came up alongside her and started revving as if they wanted her to race with them. Mrs Fanthom ignored them and continued as normal, so the Audi drove off at speed in front of her onto the roundabout and beyond, out of sight.
45. Mrs Fanthom goes on to describe that on arrival at McDonalds, Bilston, when she tried to place her order the operative struggled to hear what she was saying due to the noise from vehicles parked on the car park. When Mrs Fanthom got to the payment window, the operative apologised for the noise; she told Mrs Fanthom that the noise from the cars was often an issue, but that this evening was particularly bad. Mrs Fanthom states that she then parked up on the car park and observed approximately thirty cars parked on the car park, headlights on, revving engines, some beeping horns and some driving recklessly around the car park. Mrs Fanthom observed that most of the vehicles had some kind of performance specification or modification and that a couple of motorbikes were there also.
46. Upon leaving McDonalds' car park, Mrs Fanthom changed her route to go back home in order to avoid the Black Country Route and risk inadvertently getting caught up in the

vehicles racing. However, she states that even then she could see cars racing each other around the main Bilston roundabout and she could hear cars further down the road too.

47. The location of the incident described by Mrs Fanthom is very near to the home of the witness Jennifer Bateman who, as outlined in paragraph 49 below, has reported a significant increase in noise from car cruising since the previous injunction lapsed on 1 February 2021.
48. On 12 April 2022, the Express & Star online published an article with the headline “Teenage police chase suspect released as investigation into Wolverhampton bike meet continues”. The article reports on an incident in the Bushbury area, where two bikes at an organised meet failed to stop for officers and went on to drive dangerously. One 17 year old suspect was arrested after he crashed into a car. This article is exhibited as **Exhibit PN13**.
49. In May 2022, Sarah White spoke to Jennifer Bateman (referred to initially in paragraph 14), who provided an updated witness statement confirming that car cruising has become a regular weekend event again, notable since the expiry of the last injunction. She said she can hear the noise from the racing cars and their backfiring exhausts. She added that she and her husband had started to feel despondent and that there was little point in making reports due to the nature of the incidents and feasibility of obtaining specific details. She said that she just hopes that no one else is injured or killed and is worried that her life will become unbearable if the injunction is not granted.
50. On 16 May 2022, Sarah White attended a community meeting at Swanmore Community Centre in the Wolverhampton Ward of Merry Hill, to meet local residents and partner agencies to discuss current crime and anti-social behaviour concerns in the Penn & Merry Hill Wards. Two residents living on the A449 Penn Road raised the issue of racing on this road and regular noise nuisance suffered as a result. Councillor Stephanie Haynes was in attendance and echoed that she had received a number of enquiries about this issue, which prompted Sarah to feed back with regards to the current situation and injunction application. Councillor Haynes therefore confirmed that she fully supported this application.

51. In May 2022, Councillor Linda Leach provided a letter in support of a new injunction to tackle car cruising activity. She said that she had received many complaints from concerned residents about car cruising, stating that reports were mainly about residential streets in the Bilston North ward of Wolverhampton, and felt that incidents had risen since the injunction had lapsed. She fully supports an application for a new order. Councillor Leach's letter is exhibited as **Exhibit PN14**.
52. On 25 May 2022, Sarah White spoke to Dalbir Jassal, a driver for 247 Cars, a taxi firm based in Wolverhampton. Sarah advised Mr Jassal that she was aware he had made a call to West Midlands Police recently regarding car cruising or street racing, and that she wished to discuss this further with him. He confirmed that he had made more than one call in the past, due to problems he had experienced whilst at work. He said he could not remember exact dates, but that car cruising was still definitely a current issue and that he had made some calls in 2022, stating that he had seen around 150 cars racing each other on the Black Country Route, by Mecca Bingo and B&Q Store on Springvale Way in Bilston. He said he sees 'boy racers' gathered at the middle of the roundabout on foot, to watch others race, adding that they are usually young boys wearing masks. He said they all have cars with big exhausts and that there can be between 50 and 150 cars at a time, with around 20 to 30 spectators. He said it tends to happen around 9 to 10pm, with them only tending to stay for about 30 minutes before driving off. Mr Jassal said there have been times where he has been unable to complete jobs to pick up customers from Mecca Bingo, due to the obstruction caused by car cruising. He said that it is very much still a problem, and that business for the taxi firm is clearly lost as a result.
53. Also on 25 May 2022, Sarah White spoke to Natasha Williams, a resident living on Oxford Street in Bilston, who recalled contacting West Midlands Police recently in the past year, in response to street racing between the roundabouts near her home. Ms Williams clarified that she was not referring to lone vehicles regularly speeding on a busy road, and she confirmed that she had seen up to ten cars at a time racing each other from one end of the road to the other. She stated that it happens regularly and is usually on a Sunday night, going on until quite late, often stopping once the police are called. She added that there are often times when she has to turn up her television to mask the noise nuisance, and that her young daughter sometimes struggles to get to bed at an appropriate time because of it.

54. On 31 May 2022, Pat McFadden, Member of Parliament for Wolverhampton South East, provided a letter in support of a new application for the injunction, noting that enquiries about this issue mainly stopped when the original injunction came into force. He said that more recently, he had received complaints, mainly from residents living in the Ettingshall Park area of Wolverhampton, that the problem had recurred. He therefore supports a new application, and his letter is exhibited as **Exhibit PN15**.
55. In his witness statement dated 15 June 2022, Police Sergeant Lee Plant of the Bilston Neighbourhood Team notes that the issue of street racing is still very much present across Bilston from Wednesbury through Dudley, and beyond into Staffordshire Police areas such as Coven. He notes that 251 incidents were logged between June 2020 and March 2022 in the Wolverhampton ward areas of Bilston East, Bilston North and Springvale alone, and therefore feels that the injunction is necessary to protect those impacted by the behaviour as well as deter those responsible.

Walsall

56. In late 2020, a Walsall resident, Jeffrey Differ, reported a vast improvement overall in relation to the nuisance of car cruising in the Moxley area. I understand the statement of Jeffrey Differ will be included in the bundle of documents available to the court filed in support of this application.
57. Richard Hardy, who is a director of a business operating in Brickyard Lane, Walsall, reported that since the injunction came into force in 2015, he had seen a significant reduction in vehicle activity in Aldridge, with less noise and less anti-social behaviour. Mr Hardy stated that it has made a difference and he said in his statement that he feared if the injunction were to be removed then the problem may well return to the pre-2015 level of anti-social behaviour and nuisance. I understand the statement of Richard Hardy will be included in the bundle of documents available to the court filed in support of this application.
58. In his witness statement provided in May 2022, Steven Gittins, who is a Team Leader in Walsall Metropolitan Borough Council's Community Protection Team, stated that whilst there are still some problems associated with car cruising across the borough, reports to both the police and council significantly reduced whilst the injunction was in force. Mr Gittins stated that he had recently spoken to a local resident who had noted an improvement whilst the order was in force, but that his current experience was that he

could once again hear cars racing behind his house. He reminded Mr Gittins of his previous experience of 30 plus vehicles racing up and down from 8pm until 2am or 3am and that it made his life intolerable. Mr Gittins also stated that Business owners whose premises are in Brickyard Lane, Aldridge, confirmed that car cruising activity had reduced significantly following the injunction coming into force, but that in December 2021, palisade fencing at their premises was damaged in what appeared to be a vehicle collision, which they believed to be the result of speeding vehicles. They were concerned that associated issues with litter and debris had started to take place again.

59. Mr Gittins also references speaking to a resident in Aldridge who had noted an improvement and feeling of safety whilst the injunction was in force, however now felt that the situation had deteriorated, noting hearing vehicles racing through the centre of Aldridge and along Northgate at weekends and after 10pm. He had also seen cars breaking the speed limit and racing each other at earlier points in the evening whilst walking his dog. Mr Gittins concluded that whilst the frequency of incidents had reduced, there were still areas of concern where a worrying increase had been noted. I understand the statement of Steven Gittins will be included in the bundle of documents available to the court filed in support of this application.
60. In his witness statement dated June 2022, Temporary Inspector Philip Upton states that in relation to Walsall, there have been 282 incidents of street racing reported between April and December 2020, 269 incidents between January and December 2021 and 57 incidents between January and March 2022.

Sandwell

61. In regard to Sandwell, in late 2020, a witness statement provided by David England, who is a representative of business, highlighted that when the injunction had been in place, there had been a significant reduction in car cruising/racing in and around Warburtons Bakery. Mr England stated that he was not aware of any significant gatherings/car cruising meets since he made his last statement for the 2020 injunction review hearing. I understand the statement of David England will be included in the bundle of documents available to the court filed in support of this application.
62. In her witness statement provided in late 2020, Hema Hayer who is a resident living near to the Hallens Drive area of Wednesbury (Sandwell), reported experiencing noise and intimidation by “boy racers” for ten years. Mrs Hayer remained concerned that car cruising

would return to the scale it was before the injunction was granted and she wanted a longer-term solution to address the problem. I understand the statement of Hema Hayer will be included in the bundle of documents available to the court filed in support of this application.

63. In April 2022, Nicola Richards, Member of Parliament for West Bromwich East, provided a letter in support of a new injunction. Ms Richards said that she regularly hears from constituents about car cruising activity, namely along Kenrick Way and the surrounding area, with noisy cars, large gatherings and dangerous driving. She described a 'well oiled organisation working to frustrate the police attempts to control this behaviour and evade arrest'. She felt the issues had worsened since the expiration of the previous injunction and that there was serious concern amongst residents that a serious incident would occur. She added that 649 constituents in West Bromwich East had signed a petition relating to car cruising and speeding cars in the area and she fully supported the granting of a new injunction. This letter is exhibited as **Exhibit PN16**.
64. In his first witness statement dated 12 April 2022, Pardip Sandhu, who is an anti-social behaviour officer at Sandwell Metropolitan Borough Council, stated that the injunction had had a positive impact on residents, local businesses, partner agencies and the police whilst it was in force, but that there had still been incidents where the council sought further action by way of warning letters to residents.
65. Mr Sandhu said that he had spoken to a resident referred to as "Resident B", who had said that they still hear car cruising as they can hear vehicles racing up and down, causing safety concerns for children that play in the area. Another resident, referred to as "Resident E", said that they are aware of regular 'meets' on a Sunday evening at Kenrick Way, West Bromwich and therefore they did not go out after 8pm on a Sunday.
66. Mr Sandhu added that over 200 reports from local residents had been made to Sandwell Council during 2021 and 2022 regarding car cruising and nuisance bikes. Mr Sandhu also reported increasing problems with illegally ridden motorbikes, and that the injunction was being utilised to tackle this issue. I understand the statement of Pardip Sandhu will be included in the bundle of documents available to the court filed in support of this application.
67. In his statement dated June 2022, Police Sergeant Richard Phillips of the North Sandwell Neighbourhood Policing Team details very recent reports in relation to incidents of street

racing in West Bromwich, Wednesbury and Tipton. He believes that the injunction is needed to prevent the negative impact of street racing that residents and businesses continue to experience, and that since the lapse of the previous order in 2021, the number of people engaging in this activity has increased.

Dudley

68. In Dudley, in her witness statement provided in May 2022, Susan Dicks, who, until recently, was the Interim Head of Community Safety at Dudley Metropolitan Borough Council, stated that car cruising activities appeared to have increased in the period of time since the injunction had lapsed. Ms Dicks said that it was particularly prevalent along Manor Way in Halesowen, at Tesco Extra, Showcase Cinema and Stourbridge Ring Road.
69. Ms Dicks added that a deterrent was particularly important in light of the fact that since April 2016, several young people have died in high-speed road traffic collisions within the borough of Dudley. I understand the statement of Susan Dicks will be included in the bundle of documents available to the court filed in support of this application.
70. In his witness statement provided in May 2022, PC Jonathan Edwards confirms that in the last 6 months, there have been 'hotspots' noted in the Dudley area, namely Manor Way, Halesowen, Tesco car park, Castle-Gate and the Waterfront, Merry Hill. He provides details of 37 logs between October 2021 and April 2022 where reference is made to vehicles and an element of anti-social behaviour, including street racing with spectators, reports of excessive amounts of vehicles gathered, with incidents such as females being seen being driven on car bonnets and roofs, noise nuisance, verbal abuse and the smell of cannabis. PC Edwards concludes by saying that car cruising activity in Dudley has increased since the injunction lapsed and that he believes it will continue to do so unless a new order is granted. I understand the statement of PC Edwards will be included in the bundle of documents available to the court filed in support of this application.
71. Ms Dicks makes reference to a fatality in Dudley following an incident on 26 December 2016 (Boxing Day) at 22:30 hours, whereby a young woman fell from the bonnet of a moving car on the car park of Tesco Extra and sustained a serious head injury. The young woman died eight days later. I would ask the court to note that the opening hours for Tesco, Dudley on Boxing Day 2016 were 09:00 hours to 18:00 hours; I would therefore suggest that the people in the cars on the Tesco car park referred to in an Express & Star report

about the incident were not there to shop as the store was closed at the time the incident happened. Furthermore, as stated by Susan Dicks, Tesco Extra in Dudley is a known 'hotspot' location for car cruise 'meets'. I now reference **Exhibit PN17** which is a report published on the Express & Star website on 15 August 2018 in relation to the fatality and the conviction and sentencing of those involved.

72. In May 2022, James Morris, Member of Parliament for Halesowen and Rowley Regis, provided a statement in support of a new application for an injunction. In the statement, he notes that between 2015 and 2020 (whilst the injunction was in force) he received correspondence from five constituents who had reported car cruising related concerns. However, since December 2020, this had risen to thirty three constituents. He also references a petition launched in January 2021, to request greater action be taken to alleviate the problems, with 844 signatories at the time of writing. Mr Morris MP goes on to reference noise pollution leading to sleep deprivation and threatening and intimidating behaviour from car cruisers in response to residents attempting to evidence the incidents. He advises that the most recent incident reported to him was in April 2022, where police were investigating a report of several vehicles gathered at a local Shell garage. He is therefore fully supportive of the reintroduction of an injunction. His statement is provided as part of the bundle of evidence for this application.
73. In her witness statement, Faye Willetts, who is a resident living in Halesowen, reports that during the latter part of Summer 2020, she noticed that the noise from Manor Way had increased considerably during weekend evenings and, in particular, on a Sunday evening. She states that the noise sounded like numerous individuals were engaging in road racing activities, revving engines and driving at very high speeds. Mrs Willetts goes on to state that it is clear to her that individuals are using Manor Way as a race track, driving at very high speed and weaving in and out of other road users who are travelling at or below the legal speed limit. Mrs Willetts states that these events appear to be organised as they occur so regularly and the vehicles generally arrive and leave together at the same time each week, between 8.30pm and 11pm. I understand Faye Willetts' witness statement will be included in the bundle of documents available to the court filed in support of this matter.
74. In his witness statement from May 2022, John Slater-Kiernan, manager of the Shell Petrol Station on Manor Way, Halesowen, notes that the forecourt and car park of the station is still a meeting point for car cruisers and street racers, usually on Friday and Saturday evenings. He adds that the group often disperse quickly when the police arrive. On one

incident during the last 12 months, he retrieved CCTV footage of incidents on the forecourt where vehicles were doing wheel spins and donuts. He retrieved another incident from May 2022 where a large group of vehicles pulled in together, all high-performance vehicles. He then retrieved further footage from around the same time, where similar looking vehicles were driving at high speed at the opposite side of the dual carriageway. As a result, he fully supports a new injunction, and his statement is provided as part of the bundle of evidence for this application.

75. In his statement from 2022, Richard Hubbard Harris, manager of the Showcase Cinema at Castle Gate in Dudley, advises that the issues relating to vehicles gathering on the complex car park have been ongoing for a number of years. He recalls incidents during the nationwide lockdown as a result of Covid-19, where approximately 130 cars were present on CCTV footage retrieved, and that they often drive dangerously, speed around the car parks, do donuts and skid, sometimes with someone sat on car bonnets. Groups of people can be seen spectating and cheering. He adds that customers have been known to ask security guards to walk them to their cars when such incidents are occurring as they are too afraid to go out alone. Mr Hubbard Harris therefore fully supports a new injunction, and his statement is provided as part of the bundle of evidence for this application.
76. In her statement dated May 2022, Stacey Hewardine, Security Manager for Savills of the Merry Hill and Waterfront Centre in Brierley Hill, says that these areas are a hotspot for car cruising related activity, and that since January 2022 these have occurred regularly. Cars have been observed driving dangerously, doing donuts and handbrake turns, revving engines, smoking cannabis, littering and urinating. She added that members of staff have been subject to abuse and threats when trying to disperse the groups, and that sometimes the police need to be called. Security staff often have need to write to registered keepers of vehicles whose cars have been evidenced as being involved. She is aware that the most recent complaint from residents and business owners was on 6 May 2022. She therefore fully supports a new injunction, and her statement is provided as part of the bundle of evidence for this application.
77. In his statement dated May 2022, Chris Southall, Store Manager at Tesco Extra on Birmingham New Road, says that since starting in post recently, he has been made aware of a history of car cruising and 'boy racing' on the Tesco car park. He says that during sometime in early May 2022, he observed a group of males revving engines, screeching tyres and driving at high speed in the underground car park. He retrieved CCTV footage of groups attending after store closing time to drive around at speed. He says that other

staff members have witnessed cars doing donuts, hand brake turns and drag racing. He adds that with the smell of cannabis that is often prevalent, he is concerned about an accident occurring, referencing the fatality on the same car park a few years prior. He therefore fully supports the application for a new injunction, and his statement is provided as part of this bundle of evidence.

Spectators

78. I would now like to bring to the attention of the court the issue of spectators attending car cruise events/gatherings. The court will be aware that, in addition to the Black Country injunction previously in place, there are also injunctions in force in Birmingham and in Solihull. However, both the Birmingham and Solihull injunctions contain a clause prohibiting spectating; there was no such prohibition contained within the previous Black Country injunction. I understand copies of the Birmingham and Solihull injunctions will be included in the bundle of documents available to the court filed in support of this application.
79. Through attending regional meetings in regard to car cruising, my former colleague Sarah White learned that spectating in the Black Country area had become a particular cause for concern to West Midlands Police.
80. In the witness statement provided by PC Mark Campbell dated July 2022, who is the single point of contact in regard to car cruising/street racing issues within the West Midlands Force area, PC Campbell states that police have seen an increasing number of locations where large numbers of people are attending to spectate car cruising throughout the Black Country area. PC Campbell goes on to state that on a number of occasions, police officers have witnessed over 200 spectators lining the roads and roundabouts on the Black Country Route, Kenrick Way, West Bromwich and Manor Way, Halesowen.
81. PC Campbell states that the sheer number of spectators attending these car cruising 'meets' is causing a real danger, not only to themselves but to members of the public simply trying to go about their business. PC Campbell reports that spectators are often standing in the roads or at junctions, and with the speed the street racers are travelling at, the risk of harm to these spectators is massively increased.

82. I would also draw the attention of the court to an incident reported in the national media in 2019 where in Stevenage, Kent, a large group of bystanders were injured when a car ploughed into the crowd at a car cruising ‘meet’ whilst doing a ‘donut’ manoeuvre. PC Campbell exhibits a shocking video capturing the incident, which further demonstrates what can happen at so-called car cruise ‘meets’ where large crowds of spectators are in attendance.
83. From a community safety perspective, in order to reduce the risk of serious harm or fatalities, when considering the application for an injunction to prohibit car cruising across the Black Country area, I would respectfully request that the honourable court considers including a prohibition relating to spectators in any injunction the honourable court may be minded to make.

The lapse of the previous injunction

84. A hearing of the application by the four Black Country Councils to renew the previous injunction was held on 27 January 2021. The hearing was adjourned, and a new hearing date listed for 13 May 2021. Her Honour Judge Kelly, sitting as a High Court judge, refused the application to continue the injunction in the interim period and thus the injunction, which came into force in February 2015 for three years and was renewed in February 2018 for three years, expired at 23:59 hours on 1 February 2021.
85. By applications dated 10 and 11 May 2021, the Black Country Councils applied for the hearing of 13 May 2021 to be vacated and the matter adjourned generally with liberty to restore. By Order of 11 May 2021, Her Honour Judge Kelly granted these applications and ordered the matter be adjourned generally with liberty to restore.
86. It is my understanding that what troubled the honourable High Court back in January to May 2021 was High Court litigation before the Honourable Mr Justice Nicklin - *London Borough of Barking & Dagenham & Other Local Authorities (including Wolverhampton City Council and Walsall Metropolitan Borough Council) v Persons Unknown and Others [2021] EWHC 1201 (QB)*. For brevity I now refer to this as “the LBBD Litigation”. The LBBD Litigation began in November 2020 and culminated in hearings 27-28 January 2021 and the judgment of Mr Justice Nicklin was handed down 12 May 2021.
87. I understand that the thrust of the LBBD Litigation was that, of its own motion, concerned that Persons Unknown injunctions sought to restrain unauthorised encampments in local

authority areas (often referred to as “traveller Injunctions” as those injunctions primarily affected the traveller community) were being granted too readily, the High Court in London “called in” all local authorities with the benefit of traveller injunctions against Persons Unknown (or named defendants and Persons Unknown).

88. The LBBD Litigation considered, amongst other things, provisions of service of notice of injunction applications and service of injunctions on Persons Unknown and the circumstances in which courts should grant injunctions against Persons Unknown. The scope of the LBBD Litigation went far beyond traveller injunctions and the principles it considered applied to all types of Persons Unknown Injunctions (including injunctions to restrain car cruising). I further understand that in this context, and what could have been a significant change in the applicable law here as a result of the LBBD Litigation that was then appealed, back in January 2021, Her Honour Judge Kelly concluded that she simply could not determine the matter and refused the renewal of the Black Country Car Cruising Injunction and adjourned the matter pending judgment in the LBBD Litigation.
89. Judgment of the Honourable Mr Justice Nicklin in the LBBD Litigation was officially handed down on 12 May 2021. Given that Wolverhampton City Council and Walsall Metropolitan Borough Council were parties to the LBBD Litigation, I understand that Legal Services at Wolverhampton City Council and Walsall Metropolitan Borough Council had been privy to sight of the judgment a few days prior to this being handed down with an embargo on disclosing the same until it was handed down officially. Simply premised upon the developments of “Persons Unknown” litigation in the LBBD Litigation, an application was made to adjourn the hearing of the Black Country Car Cruising Injunction listed 13 May 2021 generally on 10 and 11 May 2022.
90. Judgment of the Honourable Mr Justice Nicklin in the LBBD Litigation runs to some 129 pages. It represented something of a “sea change” to the Persons Unknown Injunctions landscape. My understanding is that on the back of the Judgment of the Honourable Mr Justice Nicklin in the LBBD Litigation, a decision was made that the Black Country Car Cruising Injunction renewal application could not have continued in its form before the Court and it was questionable whether the Court had power from May 2021 to grant injunctions against Persons Unknown like car cruising/street racing injunctions.
91. I understand from discussions between colleagues in Legal Services and Counsel and my former colleagues whom the Black Country Councils and similar conversations in which I have been involved that, the Black Country Councils and the other local authorities

considered, with all due respect to the Honourable Mr Justice Nicklin, that his decision in the LBBD Litigation went too far and scuppered and removed the ability for local authorities to apply for Persons Unknown Injunctions to restrain significant activities of public nuisance and danger to the public including matters like car cruising. The local authorities in the LBBD Litigation appealed to the Court of Appeal. I understand Wolverhampton City Council and Walsall Metropolitan Borough Council were instrumental in bringing this appeal. I further understand that there were additional interveners such as High Speed Two (HS2) Limited who intervened, for example, because HS2 was concerned that the judgment went too far and precluded HS2 seeking injunctions preventing protestors hampering the installation of the HS2 rail track and infrastructure.

92. Permission to appeal had been granted when judgment was handed down on 12 May 2021 and the matter proceeded to an appeal hearing which took place on 30 November to 2 December 2021 under citation *London Borough of Barking & Dagenham & Other Local Authorities (including Wolverhampton City Council and Walsall Metropolitan Borough Council) v Persons Unknown and Others* [2022] EWCA Civ 13, the Court of Appeal handed down its judgment on 13 January 2022. I understand that the thrust of the judgment was that the Court of Appeal concluded the judgment of the Honourable Mr Justice Nicklin went too far and generally, with a few caveats, restored the Persons Unknown injunctions landscape to how it had been prior to the judgment of the Honourable Mr Justice Nicklin with the result that local authorities can again bring applications for street racing/car cruising injunctions against Persons Unknown before the court for the honourable court to consider whether to grant an injunction.
93. It is my understanding that the LBBD Litigation that was before both the High Court and the Court of Appeal, raises extremely complex legal arguments which I will not attempt to address in any further detail than that set out above. I anticipate, however, that these legal arguments and their application to the Black Country Council's application to renew its car cruising/street racing injunction, will be addressed specifically and in detail in statements of case, skeleton arguments prepared by legal representatives for the Black Country Councils and in advocates' verbal submissions made on behalf of the Claimant Black Country Councils at any hearing.

The Situation since the Lapse of the Injunction

94. In his witness statement, PC Mark Campbell states that the positive impact of the 2015 injunction was almost instantaneous, to the point that street cruiser meets virtually stopped. He states, however, that since organisers became well aware of the lapse of the order, the impact and increase in incidents has been significant. He says he has spoken to hundreds of drivers and passengers involved in car cruising and has regularly heard the comment ‘there’s no injunction now, so there’s nothing the police can do’. He strongly believes that an appropriately publicised injunction is the only effective way to improving the situation in the long term, which will assist further, specific police operations and will deter participants due to the strong, impactful message that he knows first-hand have previously had an impact.
95. PC Campbell goes on to provide data detailing the calls for service to the police from members of the public in the four Black Country local authority areas. He identifies a noticeable spike in the numbers of recorded incidents after February 2021, following the lapse of the previous injunction.
96. In his witness statement dated July 2022, Chief Superintendent Ian Green, who is the Force Lead for Operation Hercules, West Midlands Police’s response to illegal street racing, details the ways in which the force has approached the issue, in terms of the large scale operations required to cause disruption. The Force takes a staged approach in dealing with specific individuals where evidence of their activity has been obtained, but inevitably find that each measure alone has limited overall impact. He therefore feels the injunction is necessary to incorporate prevention and address the impact of the nuisance caused to communities.

The regional and national ‘picture’ and risk of displacement

- 97.. The court will be aware that there are currently injunctions in place prohibiting car cruising (including ‘spectators’) in both Birmingham and Solihull.
98. In 2019, Joanne Mason attended a multi-agency meeting of ‘Operation Hercules’ (Operation Hercules is West Midlands Police’s response to tackling car cruising/street racing across the region). At that meeting, Chief Superintendent Ian Green informed those present that after Birmingham and Solihull had obtained their car cruising injunctions – thus meaning that, with the exception of Coventry, the entirety of the West Midlands Force area was covered by anti-car-cruising injunctions – “would-be West Midlands car cruisers” were travelling to Cheddar Gorge to engage in car cruising.

99. As outlined in the statement of PC Campbell and supported by the witness statements provided by residents and local authority officers, the Black Country has already seen a significant increase in incidences of car cruising since the previous injunction lapsed on 1 February 2021. I am concerned that if there is no injunction in place in the Black Country, this problem will only get worse with displacement from other areas. It is known, from investigations into reports of breaches of the previous injunction, that would-be car cruisers travel into the Black Country area from as far afield as Wales and Leicestershire.
100. In regard to the national 'picture', over the past four years, Wolverhampton City Council has received several enquiries about our approach to tackling the car cruising issue in the Black Country from local authorities and police forces across England and Wales, including Essex, Cambridgeshire, Manchester and South Wales.
101. In December 2019, at the request of Newport City Council (Gwent), representatives from Wolverhampton City Council's Legal Services and my former colleague Jo Mason were guest speakers at an All-Wales Anti-social Behaviour Forum where we outlined the work undertaken in the Black Country area to combat the menace of car cruising. The delegates who attended reported that many areas of Wales are experiencing similar issues and were very keen to hear how the Black Country had tackled the issue.
102. Incidents reported in the media include the one in Stevenage referenced in paragraph 71 above. More recently, an incident was reported to have occurred during the recent Easter weekend 2021 in Essex. I now reference **Exhibit PN18** which is a press report of the recent car cruise 'meet' in Essex that attracted around 450 cars in a blatant breach of the Public Space Protection Order that is in place as well as Covid-19 regulations.
103. The conversations that have taken place with colleagues across England and Wales, together with national media coverage, has led us to the conclusion that car cruising is not confined solely to the West Midlands; it is in fact a national problem.

Seeking a longer-term solution to the problem of car cruising

104. Recognising, the scope and the longer-term nature of the problem, the City of Wolverhampton Council has commenced work on a project to seek a national solution to the problem of car cruising. The project is at an early stage; public consultation has been

undertaken and evidence is currently being gathered from first responders regionally and nationally (police, fire and ambulance services). This project is being pursued with an open mind and the case for various solutions and the merits and practicalities of different options is being considered.

105. These options, whilst entirely hypothetical at the time of writing, involve consideration of whether a change in the law through primary legislation should be considered, whether such legislation should make car cruising a criminal offence and how that would be policed, whether such legislation should be a “bespoke” injunction or whether the existing tools and powers (such as injunctions pursuant to section 222 of the Local Government Act 1972, or even public spaces protection order pursuant to section 59 of the Anti-Social Behaviour, Crime and Policing Act 2014 are sufficient).
106. Once all data and evidence are available, if the conclusion is that further or new tools and powers are required, a business case led by the City of Wolverhampton Council on behalf of the constituent authorities in the West Midlands Combined Authority area (Birmingham, Coventry, Dudley, Sandwell, Solihull, Walsall and Wolverhampton) will be put to the West Midlands Combined Authority (WMCA), the Police and Crime Commissioner’s Office (PCC), promoting the dangers and negative impact of car cruising on their agendas and seek to persuade bodies such as the WMCA and PCC to lobby the powers that be to effect the changes that may be required to curb and control incidences of car cruising on a national level.

Further feedback received from members of the public following July 2022 press release

107. On 4 July 2022, City of Wolverhampton Council circulated a press release in relation to the new injunction application (**Exhibit PN19**), which invited members of the public to submit comments and observations regarding street racing and the application itself. A large number of comments and enquiries were received, and I will provide an overview here.
108. On 4 July 2022, a resident in Dudley emailed the anti-social behaviour team (ASBT) inbox, to comment that he has reported street racing in his catchment area to the police and local councillors in Brierley Hill. He said he had reported cars meeting up, skidding and speeding at the Waterfront car park in Merry Hill. He said the number of cars varies between 2 to 6 and some of them speed and skid ‘like idiots’.

109. On 4 July, a resident in Stourbridge emailed the ASBT inbox, wishing to advise of high-speed car racing on Mill Race Lane, Stourbridge. They stated that it happens most nights of the week, but particularly on Friday and Saturday evenings between 9pm and 11.30pm. They said the gatherings are normally outside the “Full Throttle Indoor Raceway” go kart centre and proceed along the full length of Mill Race Lane, and apart from being a danger to themselves, they are a danger to anyone visiting local facilities along the lane. They concluded “the speeds they drive at are EXCESSIVE!!!”
110. On 4 July, a resident in Halesowen remailed the ASBT Inbox, saying they had heard about the street racing injunction application, commenting “About time!”. They said they live ‘a stone’s throw’ from the Halesowen bypass and the ring road, and that they are sick to death of being woken up by anti-social individuals racing on those roads. They said it happens most nights and more so over the weekends, and that it is annoying, especially when there is no apparent action being taken to stop them. They added that the fines, bans and impounded cars would be substantial. They concluded by saying that they were fed up of offenders getting away with it and not being held accountable for their actions.
111. On 4 July, a local councillor for Brierley Hill ward in Dudley emailed the ASBT Inbox, reporting that frequent street racing meetings have been taking place in recent months at the main car park for the Waterfront Business Park on Waterfront Way, Brierley Hill. He advised that dozens of cars are turning up and driving dangerously, racing, braking and performing donuts, and that lives of pedestrians and other road users were therefore at risk of injury or fatality.
112. On 4 July, a man describing himself as “a disabled resident living on West Bromwich Road in Walsall”, emailed the ASBT Inbox to state that he could not welcome the proposals to try to prevent street racing enough. He said “as a person living with MS and impaired mobility in particular, the speed at which vehicles travel along my road is quite frightening to say the least. The backfiring of speeding vehicles sounds like gunshots, and I am sure that some of these vehicles cannot be legally on the road i.e. I cannot see how they would pass an MOT for starters”. He added “the police need to start a monitoring campaign and stop vehicles to see if they meet the current law with MOT’s etc. I would not attempt to cross the road to even post a letter because of the speeding traffic. I have campaigned for more traffic calming measures on this road to no avail.”

113. On 4 July, a resident emailed the ASBT Inbox to say “boy racers are using Blackwood Avenue, Wednesfield, Wolverhampton as a race track, if it’s not stopped someone is going to get killed. The main culprit is using a quad bike, this was occurring all weekend.”
114. On 5 July, a resident of West Bromwich emailed the ASBT Inbox to say that she welcomed the proposals to put an end to street racing. She said racing in the area in which she lives is a nuisance, and that late at night (from 11pm onwards), cars can be heard racing along Trinity Way with loud exhausts, screeching brakes and vehicles ‘whizzing’ up and down. She said she believes that the boy racers congregate in the vicinity of Kenrick Way, using Kenrick Way, the island at the junction of Trinity Way/Kenrick Way and Trinity Way towards the expressway as some sort of circuit. She added that now the hot weather is upon us, windows have to remain closed due to the noise from boy racers speeding, which she described as ‘no fun’. She said that if windows are left open, sleep is disturbed and this impacts on her work commitments. She added that she sincerely hopes that it is dealt with before someone is killed. She concluded that given there are several sets of crossings for pedestrians along Trinity Way, she hoped that residents could enjoy a decent quality of life without sleep being impacted by ‘selfish boy racers.’
115. On 5 July, a resident in Walsall contacted the ASBT Inbox to complain about the ‘regular dangerous situation in Aldridge’. He said that he often walks or commutes through Aldridge, and over the last few months has on several occasions witnessed a group of men riding motorcycles very dangerously, whilst wearing bandanas or hoodies, with no safety helmets and sometimes with two people per bike. He said he has seen groups of up to 10 motorcycles or more, and that they ride at high speed whilst totally ignoring road signals, road junctions, traffic lights, grass verges, pedestrians on footpaths and even the direction of traffic. He added that he has heard the group ‘tearing around Aldridge’ from his garden, and that it is a repeat problem.
116. On 5 July, a resident of Wolverhampton emailed the City of Wolverhampton Council’s ‘Litigation’ team inbox, to comment that he was glad that the issue was being tackled, as there always seems to be a gathering around the B&Q store in the Sedgemoor Park area. He added that the cars that pass his house are usually loud, which at night is unbearable as they race up and down Wolverhampton Road East, revving their engines so that the exhausts pop and cause loud bangs. He added that he hoped some headway would now be made.

117. On 4 July, a resident in Willenhall emailed the Litigation inbox to comment that they were in support of the street racing ban, adding that the Essington Road in New Invention is used nightly as a racetrack, with cars overtaking and reaching speeds of what looks like 60 plus miles per hour. He added that both cars and motorbikes will race at high speed, and that it will not be long before there is a serious accident or fatality.
118. On 4 July, a resident in Walsall emailed the Litigation inbox to comment that they were delighted to hear that we are seeking the injunction. She said that she regularly hears vehicles speeding along the A34 between Walsall and Broadway, usually well into the evening. She said she sometimes hears motorbikes and other times, high performance cars. She said the roads are straight and wide, and despite being in a residential area, the speeds being driven at are ridiculous, without any care for others.
119. On 4 July, a resident in Walsall emailed the Litigation inbox to say that they strongly uphold an injunction against street racing, especially in Walsall, as they live on the edge of a large industrial estate, with their lane being one of the roads that leads to the estate. They said that the worst times are during weekends when factories are closed, and the roads are clear of traffic. Drivers then use the roads as a race track, which can be heard from their house as they race around revving engines. They added that the 'aftermath of handbrake turns' can be seen on the road. They concluded that they would strongly agree with anything the court could do to stop and severely punish anyone who is participating in this illegal activity, as they feel that these people do not realise that they are also putting members of the public and other road users at risk.
120. On 7 July, a resident who did not detail where they reside, emailed the Litigation inbox, attaching an email they had sent to the same inbox in January 2021, in response to the proposed renewal of the previous injunction. This resident stated that they were forwarding their email in light of the recent press release, as they were still standing by their comments made back then. In the email dated 20 January 2021, he said that as an ex-police traffic Sergeant who retired before having the benefit of such an injunction, he had regularly witnessed incompetent and reckless driving being displayed by boy racers along the Black Country Route. He added that the noise nuisance caused by the large groups and illegal exhaust systems created an awful stress to anyone living within earshot of behaviour he described as 'disgusting'. He therefore strongly supported the injunction.
121. On 9 July, a resident of Streetly in Sutton Coldfield contacted the Litigation inbox to comment that our proposed actions 'are a very good idea', stating that street racing is a

community nuisance everywhere, and that something should be done to attempt to stop this selfish and dangerous behaviour. She said she suffers nearly every day, especially in the evenings, and that she hopes our action has a great effect on the situation and makes everyone's lives in the community quieter and safer. She concluded that these drivers should be stopped and punished severely to make them realise that what they are doing is totally against the law.

Conclusion

122. In summary, the Black Country Councils will argue that witness statements provided by members of the public and businesses and police data from February 2015 to 1 February 2021 (when the previous injunction was in force) showed a significant reduction in car cruising in most areas across the Black Country.
123. Concerningly, police data and witness evidence show there has been a significant increase in car cruising activity since the injunction lapsed on 1 February 2021.
124. I would request the court to consider the experiences of the over 100 local residents and businesses who provided witness statements in 2013/14 outlining their suffering due to the anti-social and dangerous activity of car cruising. There is no doubt that these people will not want to see a return to pre-2015 levels of anti-social behaviour from car cruising. For the residents who have made contact with us so far in 2021 and 2022, I am seriously concerned about the impact on their mental health and well-being. I firmly believe it is the duty of the authorities to protect law-abiding citizens from this behaviour.
125. I would also ask the court to note that in 2016, injunctions banning car cruising were granted for the whole of Birmingham and Solihull local authority areas. It is vital therefore that the Black Country area has an injunction in place in order to avoid any possible displacement of car cruising from these areas into Walsall, Sandwell, Dudley and Wolverhampton.
126. I believe it is vital that we have an injunction in place across the Black Country area to enable West Midlands Police and the four Black Country councils to continue to tackle the dangerous and anti-social activity of car cruising. As already detailed, when considering this injunction application, I respectfully request the court to consider the inclusion of a prohibition on spectators for the reasons outlined.

127. To conclude, I wholeheartedly feel that the previous injunction was successful in significantly reducing the menace of car cruising across the Black Country area. While the previous injunction was in place, a strong partnership approach to this issue between West Midlands Police and the four Black Country councils to tackling the issue of car cruising was develop and this continues at the time of writing, and both the Black Country Councils and West Midlands Police are committed to ensuring this relationship will continue. There is overwhelming support for an injunction from local residents and businesses who, prior to the previous injunction being in place, had all suffered for many years and who are concerned that, without an injunction in place, the scale of the car cruising issue will return to the levels experienced pre-2015.

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.

Name of Claimant: Wolverhampton City Council

Pardip Nagra

Date 19/07/22

Print name in full PARDIP NAGRA

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN1

This is the document referred to as "Exhibit PN1" in the witness statement of Pardip Nagra dated 19 July 2022.

i) Statement of: Lisa Fox
ii) Statement No: 1
iii) For: claimant
iv) Dated: 02.11.2013
v) Exhibits: -

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

BETWEEN:

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

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF LISA FOX

I Lisa Fox of [REDACTED] Finneywell Close, Wolverhampton, West Midlands, WV14 9XN, WILL
SAY AS FOLLOWS:

1. I am a resident living at the above address.
2. This statement is in relation to boy racers who congregate on a Sunday night for the past year on the Black Country Route near to The Elizabeth Arms Public House. Over the last year after about eight o'clock in the evening on Sunday evenings a large gathering of noisy vehicles are parked up to the rear of my address.
3. The property is a modern double glazed address and whilst my family are inside the property we can hear the excessive noise from the vehicles' engines causing us unnecessary anti-social noise. Articles within the property will shake and vibrate from this noise. My young daughter, who is aged 10 years old, cannot sleep from this noise. On particular evenings this will continue beyond eleven o'clock at night.

4. I would estimate that our address from the Elizabeth Arms Public House is about 300 yards from where they are parked.
5. The situation has become so bad that I have called the police on two occasions this year complaining of the excessive noise.
6. My first log was on 13th January 2013 at 21:04 hours (Ref: 1815) when I made a call to the police complaining of vehicle revving and racing.
7. I made a second call on 24th February 2013 at 21:58 hours (Ref: 2084) which was again a complaint of noise from vehicles.
8. I would support a police injunction against these road racers to stop the noise and inconvenience that the vehicles are causing on a Sunday night to my life.

STATEMENT OF TRUTH

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

Full Name: Lisa Fox

Name of Claimant: Wolverhampton City Council

Signed Lisa Fox

Print Name LISA FOX

Dated 2. 11. 13

- i) Statement of: L Fox
- ii) Statement No: 2
- iii) For:
- iv) Dated:
- v) Exhibits:

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF LISA FOX

I Lisa Fox of [REDACTED] Finneywell Close, Wolverhampton, West Midlands, WV14 9XN, WILL
SAY AS FOLLOWS:

1. I am Lisa Fox and I live at the above address.
2. This is the second statement I am making in relation to the problem of 'boy racers' who congregate on the Black Country Route near to The Elisabeth Arms Public House.
3. I would estimate that our address from the Elisabeth Arms Public House is about 300 yards from where they are parked.
4. Since I made my last statement in October 2013, I haven't heard the noise from the boy racers as often. I used to hear them every Sunday evening but I would say that nowadays I hear them on average once every 4 weeks.

5. This may be because residents are calling the police and they arrive quickly and the boy racers move on. Or it could be that they are gathering in other areas along the Black Country route.
6. Although the frequency of these gatherings is less often than it used to be, when they do happen this has a detrimental impact on mine and my family's quality of life. As I mentioned in my previous statement, when these gatherings occur, items in my house will shake and vibrate from the noise and my young daughter cannot sleep.
7. I would support a police injunction against these boy racers to stop the noise and inconvenience that they are causing.

STATEMENT OF TRUTH

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

Full Name: Lisa Fox

Name of Claimant: Wolverhampton City Council

Signed 

Print Name LISA FOX

Dated 29/7/14.

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN2

This is the document referred to as "Exhibit PN2" in the witness statement of Pardip Nagra dated 19 July 2022.

i) Statement of: *Peter James*
ii) Statement No: 1
iii) For: *claimants*
iv) Dated: *09.11.2013*
v) Exhibits: -

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

BETWEEN:

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

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF PETER JAMES

I, Peter James of [REDACTED] Moor Street, Wednesbury, West Midlands, WS10 0QR, WILL SAY AS FOLLOWS:

1. I am Peter James and I am a resident living at the above address.
2. At about 22:45 hours on Sunday 2nd September 2012 I had driven down Dudley Street, Wednesbury in my car accompanied by my girlfriend, it's actually her car not mine. I was facing downhill and was approaching the island at the A41 Black Country New Road. I had to stop at the island because I was unable to flow into traffic due to approximately 25 boy racers in modified cars driving around the island. I could see that they were all together as a group because they were all behind each other. The cars consisted of Golfs, Subarus, etc. I saw cars with spoilers fitted to the back, skirts to the side with neon lights on, tinted windows and really loud exhausts.
3. My girlfriend made a comment complaining about the boy racers being here again. We were at the island for about two minutes until we were able to get

on. Most of the cars went around the island about 5-6 times and it's quite a big island. This just held us all up as other cars were waiting to get on. There were approximately 3-4 people in each car and they were all laughing. It was frustrating as there was no need to drive in the manner in which they did.

4. Every Sunday this happens, I am just glad I don't live by it. Whilst these cars were driving around the island more cars were turning up coming along the A41 from my left and going down the filter lane into Hallens Drive, they were all boy racers travelling at ridiculous speeds.
5. As I got a chance to get on the island to turn left (1st exit) I continued to the next island which the 3rd exit into Leabrook Road (I was going to Bannister Road). I reach the next island and saw 5-6 vehicles travelling around the island and they were again repeatedly driving around the island flicking the 'Vs' up at the motorists who were trying to go about their business. One of them had pulled his trousers down and was exposing himself whilst going round the island.
6. The main concern at that time was a metallic blue Vauxhall Astra where the passenger was pouring a liquid onto the road surface from an open passenger door whilst the vehicle was in motion. This worried me as it was just dangerous for everybody. They eventually all split, some went off to Hallens Drive and some drove off up the A41 towards Great Bridge at the Asda. They are a pain when they gather there as well because they go from the Asda at Great Bridge back and forwards to Hallens Drive in Wednesbury.
7. I eventually got onto the island taking great care because I didn't know what had been poured onto the road and entered Leabrooke Road turning right into Bannister Road, where my girlfriend lives.
8. The whole situation of the boy racers meeting every Sunday is depressing and annoying. They gather in large numbers and they are doing something they shouldn't and it's causing a nuisance to all other road users and I presume residents and workers, especially in Hallens Drive. It's been going on for years now and I am just fed up with it.

9. I am a keen fisherman and have enjoyed going fishing for a long time. I used to fish regular on the canal at Hallens Drive in Wednesbury, it's a nice little spot. But as time has gone on I got to a Saturday and thought I would go fishing down by Hallens Drive but then I would remember that that would be Sunday and the boy racers would be there so I wouldn't go then. I didn't want to go because the noise of the cars, listening to them skidding around the island by the canal, doing doughnuts, etc. Also there's lots of kids on the canal bank, kids on the towpath on motorbikes, there's litter getting dropped as well. I just stopped going down there to go fishing because of them and I enjoyed it down there. Now I just walk the dog instead of going down there.
10. All in all they cause a nuisance every Sunday, they have stopped me from enjoying my past time. My girlfriend at the time used to freeze with fear when she was driving as they all came speeding past.
11. The police do what they can but they can't always be there every Sunday. I just hope that something gets done about it to reduce the dangers and the numbers that turn out.
12. I've had some nice times fishing down there and I look forward to returning one day if the boy racers disappear.

STATEMENT OF TRUTH

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

Full Name: Peter James

Name of Claimant: Sandwell Metropolitan Borough Council

Signed Peter James

Print Name PETER W JAMES

Dated 9/11/13

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN3

This is the document referred to as "Exhibit PN3" in the witness statement of Pardip Nagra dated 19 July 2022.

i) Statement of: Carl Yeomans
ii) Statement No: 1
iii) For: claimants
iv) Dated: 07. 11. 2013
v) Exhibits: -

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

BETWEEN:

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

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF CARL YEOMANS

I, Carl Yeomans of [REDACTED] Field Road, Bloxwich, WS3 3HZ, WILL SAY AS FOLLOWS:

1. I am Carl Yeomans and I live at the address stated above.
2. On 15th July 2013, I provided a witness statement to West Midlands Police regarding ongoing incidents of large gatherings of youths in motor vehicles, playing loud music, revving engines and racing around the industrial estate at Brickyard Road, Aldridge.
3. On Sunday 28th July, I again had cause to contact the police as there was a large gathering of vehicles in Brickyard Road from 21.30 hours onwards. Up to around 30 vehicles had attended this location, they were again playing loud music, several of these vehicles were racing each other around the estate. I reported this as it is ongoing and our quality of life is being affected, every Sunday for the past few weeks, I along with several other residents in the area, have had to put up with this anti-social behaviour.

4. I also had cause to contact the police the next Sunday evening, being 4th August 2013, as again a large gathering of youths in motor vehicles had attended Brickyard Road, again around 21.00 hours in the evening, they were racing around the estate, making it unsafe for us to travel, and difficult to rest as most of us had work early on Monday morning. On this evening I, along with another resident, went into Brickyard Road and started taking number plates of these vehicles that were racing, when they saw me do this, some of the youths became abusive and beeping horns at us.
5. I have provided PC 6571 Pemberton with details of these vehicle registrations that I have obtained at 17.30 hours on Friday 9th August 2013, at Aldridge Police Station.

STATEMENT OF TRUTH

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

Full Name: Carl Yeomans

Name of Claimant: Walsall Metropolitan Borough Council

Signed Carl Yeomans

Print Name CARL YEOMANS

Dated 7/11/13

- i) Statement of: C Yeomans
- ii) Statement No: 2
- iii) For: Claimant
- iv) Dated:
- v) Exhibits:

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF CARL YEOMANS

I, Carl Yeomans of Marina, Brickyard Road, Aldridge, WS9 8SR, WILL SAY AS FOLLOWS:

1. I am Carl Yeomans and I live at the address stated above.
2. This is the second statement I am making regarding the 'boy racers' in the Brickyard Industrial Estate on Sunday evenings.
3. I can state for the past few weeks this problem has improved. I know this is due to the police being in the area of Brickyard Industrial Estate on Sunday evenings.
4. However, this 'car cruising' has been going on for at least 5 years; I know as soon as the police stop patrolling every Sunday evening then the gatherings will return.

5. There are still vehicles that I suspect are 'boy racers' who visit the estate on Sunday evenings and upon seeing the police they leave the area.
6. I am aware the Police and the Council are still trying to obtain an injunction. I really hope they are able to get this as it will improve our quality of life.

STATEMENT OF TRUTH

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

Full Name: Carl Yeomans

Name of Claimant: Walsall Metropolitan Borough Council

Signed Carl Y

Print Name CARL YEOMANS

Dated 29/7/14

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN4

This is the document referred to as "Exhibit PN4" in the witness statement of Pardip Nagra dated 19 July 2022.

i) Statement of: David Philip Clark
ii) Statement No: 1
iii) For: Claimant
iv) Dated: 12.03.2014
v) Exhibits: DPC1 - DPC2

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

BETWEEN:

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

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF DAVID PHILIP CLARK

I, David Philip Clark of Johnson Controls Automotive (UK) Limited, Hallens Drive, Wednesbury, WILL SAY AS FOLLOWS:

1. I am David Clark and I am employed by Johnson Controls (UK) Limited, Hallens Drive, Wednesbury, as a Health & Safety Co-ordinator. I have worked at Johnson Controls for 16 years.
2. I am making this statement in relation to the problems that the gatherings of 'boy racers' are causing in the Hallens Drive area and the impact it is having on our business.
3. Johnson Controls is a large, multi-national corporation whose international head office is in Milwaukee, USA. Johnson Controls is one of the largest employers in the Wednesbury area, having approximately 340 employees. We are a first line automotive supplier, manufacturing foam for car seating for the vast majority of the UK car industry.

4. Since at least 2011, 'boy racers' have been gathering and illegally racing in Hallens Drive and the surrounding area on most Sunday evenings from around 10.00pm. Typically, these gatherings involve up to 250 vehicles that are either parked or are racing around the area causing traffic congestion. The cars race each other at high speeds up and down Hallens Drive, often filming each other.
5. The gatherings also attract a large number of spectators; I would estimate up to 300 people of all ages, including families. The spectators stand close to the road cheering the 'boy racers' on, which is extremely dangerous given the speeds at which the vehicles are racing each other.
6. There has already been a serious accident when one of the cars crashed and a young man had to be cut free from the vehicle by the emergency services. I believe it is only a matter of time before there is a fatality, either a 'boy racer', a spectator, an employee of Johnson Controls or delivery driver, or a member of the public.
7. When these gatherings occur, both sides of Hallens Drive have vehicles parked on either side of the road. This obstructs and causes a danger to vehicles trying to access and exit Johnson Controls site. This also impacts on other businesses in the area, including Warburtons.
8. Johnson Controls' plant operates 24 hours a day, 7 days a week to meet manufacturing deadlines. We have chemical tankers arriving at and leaving the plant night and day. Due to the hazardous chemicals involved in our manufacturing process, Johnson Controls is classed as a lower tier Control of Major Accidents and Hazards (COMAH) site. The chemicals we use are mainly toluene diisocyanate and metamethane.
9. If there were to be a collision involving a chemical tanker this would have serious consequences for the safety of the general public and would be a major incident for the emergency services. This is because if these hazardous chemicals escape into the atmosphere they could potentially cause fatal breathing problems and would involve immediate evacuation not only of the Johnson Controls' plant itself but, depending on the severity, evacuation spanning a 5 mile radius of the site.

10. Access to Johnson Controls' site main gate is often blocked by spectators and when the 'boy racers' are all in convoy or are racing each other up and down Hallens Drive it makes it extremely difficult for the delivery vehicles to get on and off the site. There have been occasions when members of staff from Johnson Controls have had to go out onto Hallens Drive and attempt to stop the traffic themselves just to enable the tankers to get in and out. This in itself is extremely dangerous. The DVD accompanying this statement [Exhibit D1c1] shows a vehicle attempting to leave our site; the headlights of the 'boy racers' passing in convoy are clearly visible. Although the footage was captured on 7 October 2011, I would point out that in 2014 this activity continues to be typical Sunday evening in Hallens Drive.
11. Many of the tankers/delivery vehicles come from all over mainland Europe and are on tight timelines for ferry crossings and tachograph restrictions. The delays the drivers are experiencing when trying to deliver to Johnson Controls site are having a serious detrimental impact on their businesses. In fact some of the companies are telling us they do not want to deliver to us anymore because of the problems they are experiencing.
12. In addition to the danger posed by these 'boy racer' gatherings and the detrimental impact this is having on our business and that of our suppliers, I am also extremely concerned about the criminal and anti-social behaviour of some of the individuals.
13. I produce photographs [Exhibits D1c2] that show the criminal damage that was done to a delivery vehicle when a plastic barrier was thrown at the windscreen by someone attending one of these gatherings. The driver was in the cab of his vehicle when the damage was done.
14. Approximately a quarter of Johnson Controls (Wednesbury) employees are females. I have received numerous complaints from female staff who state that males attending the 'boy racer' gatherings regularly abuse them with comments of a sexual nature when they are arriving at work to start their shifts on Sunday evenings. Understandably, the women find this behaviour towards them extremely intimidating and upsetting. I am concerned that a partner of one of the women when dropping her off at work will take exception to this behaviour and that this may result in an altercation.

15. Of further annoyance is the amount of littering that occurs at these gatherings. Spectators turn up with take-away food, drinks, cans, etc and just discard them in Hallens Drive. This is extremely unsightly and reflects badly on the area.
16. The local police attend when they can which helps at the time but, as soon as the police leave the location, the 'boy racers' return.
17. In summary, the behaviour of these 'boy racers' and the spectators who attend these gatherings are posing a serious threat not only to Johnson Controls employees and delivery drivers, but also to employees of other companies in the local area, the general public and other road users. The behaviour is also adversely affecting our manufacturing process which our UK head office is aware of.

STATEMENT OF TRUTH

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

Full Name: David Philip Clark

Name of Claimant: Sandwell Metropolitan Borough Council

Signed

Print Name

Dated



DAVID P. CLARK

12th MARCH 2014.

i) Statement of: David Phillip
Clarke
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 12.03.2014
v) Exhibits: DPC1 – DPC2

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT DPC1

**This is the document referred to as Exhibit DPC1 in the witness statement of
David Phillip Clarke dated 12.03.2014**

EXHIBIT DPC1 is a DVD of Video
Footage taken at Johnson Controls,
Hallens Drive, Wednesbury on 07
October 2011

i) Statement of: David Phillip
Clarke
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 12.03.2014
v) Exhibits: DPC1 – DPC2

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

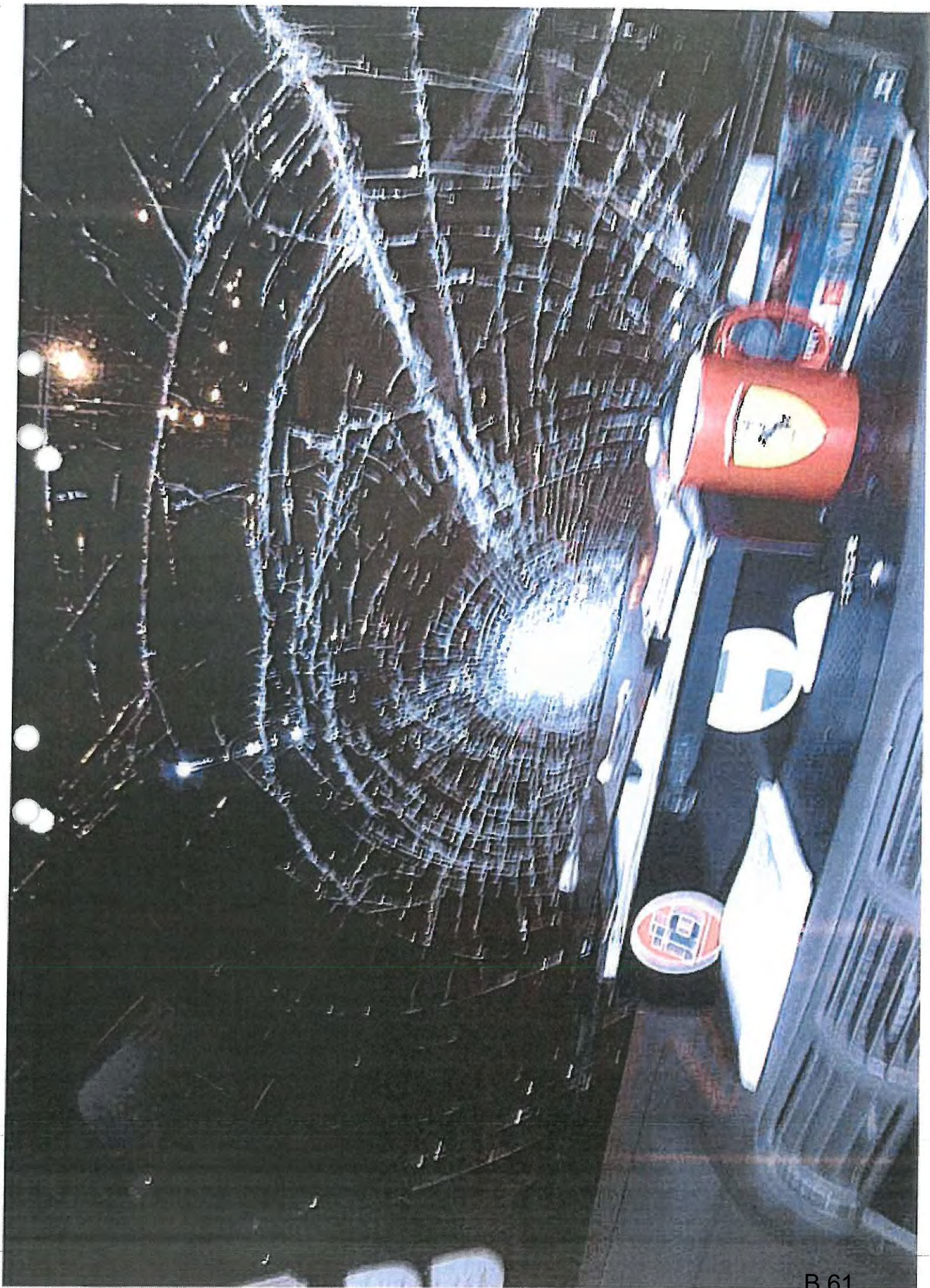
EXHIBIT DPC2

**This is the document referred to as Exhibit DPC2 in the witness statement of
David Phillip Clarke dated 12.03.2014**

EXHIBIT DP C2















i) Statement of: *David Phillip Clarke*
ii) Statement No: *2*
iii) For: *Applicant*
iv) Dated: *17/07/2014*
v) Exhibits: *OPC 1*

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF DAVID PHILIP CLARK

I, David Philip Clark of Johnson Controls, WILL SAY AS FOLLOWS:

1. I am the above named person and work at Johnson Controls in Wednesbury as a Health and Safety Coordinator. The company itself manufactures the foam for car seats. We are a large company and employ 314 people. At any one time there are just over 100 people due to us having three shift changes.
2. This is the second statement I am making regarding the problems we have in relation to the boy racers that attend Hallens Drive.
3. We have at times approximately 300 people lined up and down the road. They stand and watch the cars racing up and down. They drive dangerously and exceed the speed limit. Somebody will be killed one day.
4. We have problems such as obstructions to the entrance to our site. This is where on a Sunday night the entrance gates are blocked by the boy races that park there. People we employ cannot get in our out of the site due to this. They also get verbal abuse from the spectators when they try and get out.

5. This itself brings about a health and safety issue. If we need to evacuate the site due to the dangerous chemicals we hold on the site, we would not be able to exit easily due to the obstructions. We have tanks full of very dangerous chemicals, we have had an incident where one tanker driver parked up Hallens Drive and the boy racers smashed his window screen because he had parked in the road they wanted to race on.
6. The boy racers also removed some of the road signs from the road in Hallens Drive.
7. With all the spectators along Hallens Drive there is always a large amount of litter left by the next day. It has a negative impact on the area especially to the police who visit our site.
8. We basically have a big problem every Sunday night due to the boy racers. It is business interruption that affects every aspect. The people we employ have made lots of complaints to us which then causes more work for us internally. The main thing for me is the verbal abuse my staff get from the boy racers and also the safety aspect of not being able to evacuate the site satisfactorily.
9. These issues are current still and have been going on for several years. It has been a constant problem for us and how nobody has been killed before now is beyond me.
10. With this statement I exhibit the G4S security report for the second of June 2014 [Exhibit]. This states that the security guard had problems with boy racers on that night.
11. We have made several complaints to the police service over the last few years. They have been able to have an impact on the boy races when they have been present to police the matter. However, as soon as the police go the boy racers return.
12. We are very keen for the issues of the boy racers to be removed from the area on Sunday evenings. We work in an industrial area suitable for our industry and we share it with other large companies such as Warburtons and Amazon. It is not designed for spectators and street racing.

STATEMENT OF TRUTH

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

Full Name: David Philip Clark

Name of Claimant: Sandwell Metropolitan Borough Council

Signed _____

Print Name DAVID P CLARK

Dated 17/7/2014.

i) Statement of: David Phillip
Clarke
ii) Statement No: 2
iii) For: Claimants
iv) Dated: 17.07.2014
v) Exhibits: DPC1

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT DPC1

**This is the document referred to as Exhibit DPC1 in the witness statement of
David Phillip Clarke dated 17.07.2014.**

Section 27 Direction to Leave - COPY -

This form is a 2 part set

TT 5574702



Sections 30-36 of
Anti Social Behaviour Act
Security Officer Report

Customer name JOHNSON CONTROLS Assignment no 40359 Security Officer D.O. Austin Payroll no 817524
Day of week SUNDAY Date 22/06/14 Time 700PM Hours of duty: From 700PM To 700AM

Handover <input checked="" type="checkbox"/> Keys/Key cards Other (specify) <u>CCTV</u>	Equipment in working order Security Officer Control System Yes/No Hand Torch Yes/No Other <u>PHONE</u> Yes/No	Fire, security and quality question nos Answers <u>4.2</u> <u>10</u>
--	---	---

I confirm that I have read and understood my assignment instructions and all current temporary instructions.

Time in	Emp. No.	Surname	Signature	Time in	Emp. No.	Surname	Signature
700PM	817524	Austin	D.O. Austin				

Seq No.	Time	Duty Record	Initials
1	700PM	DESMOND book on duty. LOCK MAIN GATE. -	D.O.A
2	8.30	PATROL THE SITE. WAREHOUSE TENT. BACK FENCE CHECK. -	D.O.A
-	-	CONTAINERS. CALORGASTANK. OFFICE IS CHECK.	D.O.A
3	8.50	RETURN TO BASE. OPEN MAIN GATE. OFFICE IS OPEN.	D.O.A
4	10.45	I HAVE TO CALL THE POLICE BOY RACERS BLOCK -	D.O.A
-	-	THE MAIN GATE. PATROL THE SITE. OFFICE IS CHECKING.	D.O.A
5	11.30	RETURN TO BASE. OPEN MAIN GATE.	D.O.A
6	-	AUTOMATIC LOCK NOT WORKING. MAINTENANCE INFORM.	D.O.A
7	1.20	LOCK MAIN GATE. PATROL THE SITE. OFFICE IS CHECK.	D.O.A
8	1.40	RETURN TO BASE. OPEN MAIN GATE.	D.O.A
9	2.30	PATROL THE SITE. OFFICE IS CHECK. OFFICE DOORS FAULTY	D.O.A
10	2.50	RETURN TO BASE. PATROL THE SITE. OFFICE IS CHECK. -	D.O.A
11	3.30	OFFICE IS DOORS RESET. UNLOCK CONFERENCE ROOM. D.	D.O.A
12	3.50	RETURN TO BASE. OPEN MAIN GATE. ALL IS WELL.	D.O.A
13	700AM	DESMOND off duty.	D.O.A

Management Visit

Signature

Date

Serial No

B 70

OM3 10/05

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19.07.2022
v) Exhibits: PN1 – PN19

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT PN4: A NOTE REGARDING "EXHIBIT DPC1"

David Philip Clark Health and Safety Coordinator at Johnson Controls, Hallens Drive, Wednesbury, provided the Claimants with video footage exhibited to his witness statement dated 12.03.2014 for the purposes of the Claimants' injunction application to restrain "car cruising" within the Black Country (which was heard by the High Court and granted on 1 December 2014). The video footage was captured on 7 October 2011 and was exhibited to Mr Clark's Statement dated 12.03.2014 marked as "**Exhibit DPC1**".

Whilst the Claimants' recollection is that this video footage was available to the Court in December 2014, in the intervening years the Claimants have, unfortunately, lost the video footage that was Exhibit DPC1.

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN5

This is the document referred to as "Exhibit PN5" in the witness statement of Pardip Nagra dated 19 July 2022.

- i) Statement of:
- ii) Statement No:
- iii) For:
- iv) Dated:
- v) Exhibits:

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF LISA PARMAR

I, Lisa Parmar of ■ Short Street, Wednesbury, WILL SAY AS FOLLOWS:

1. I am Lisa Parmar of ■ Short Street, Wednesbury. I have lived at this address for 15 years.
2. I am employed by Wolverhampton City Council as a Neighbourhood Safety Co-ordinator covering the South East of the City. I have held this post for 13 years.
3. I am aware of the problems caused by 'car cruising' along the Black Country Route as this issue has been raised by residents attending Partners and Communities Together (PACT) meetings in Bilston East and Ettingshall and is also currently a live issue being discussed at the Ettingshall Neighbourhood Tasking meetings.
4. In a personal capacity, I have heard the noise when in my own property, predominantly on Sunday evenings over the past couple of years. There are

occasions when the car cruising has also taken place on Friday and Saturday evenings as well and continues until approximately 1.00am on some occasions. Whilst I hear more noise when the cruising is taking place in the Hallens Drive area I can also hear the noise when this is happening in the Moxley area mainly around the location of the Aldi supermarket.

5. On Sunday 18th May, noise associated with the car cruising was evident to me from approximately 10.00pm until approximately 12.30am.
6. My route into work takes me down Patent Drive and into Western Way. On Monday 19th May at approximately 9.50am as I travelled down Western Way approaching the traffic island, I noticed markings in the road. I travelled to my work location at 58 Bank Street, Bradley, Bilston. I dealt with a few matters in the office and returned to Hallens Drive at approximately 11.30am where I took 6 photographs. I sent these photographs to Joanne Mason, Wolverhampton Anti-social Behaviour Team Manager and Inspector Akeel Najib from Sandwell Local Policing Unit.
7. Exhibit shows a wall at the side of the road on Hallens Drive on the approach to the island. The street name has been painted over and the words 'Dreams Racing' and 'Bad Boys' has been painted onto the wall.
8. Exhibit shows markings on the road - '30 MAX. SLOW DO..'. These markings are on the road as the island is approached from Hallens Drive.
9. Exhibit is the same location but taken from a slightly different angle to show more of the words that had been sprayed, which are 'SLOW DOWN. DRIFTING AHEAD ↑'.
10. Exhibit shows the 'start' line that has been painted on the entry into Hallens Drive from the island.
11. Exhibit is painted on the road in between the exit from Patent Drive and the entry into Hallens Drive. The markings are 'MAX SPEED 150'.
12. Exhibit shows 'FUCK THE PIGS' which was painted on the pavement.

13. All of the above have been identified on an aerial view of the area [Exhibit].

STATEMENT OF TRUTH

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

Full Name: Lisa Parmar

Name of Claimant: Sandwell Metropolitan Borough Council

Signed L. Parmar

Print Name LISA PARMAR

Dated 22/5/14

i) Statement of: Lisa Parmer
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 22/05/2014
v) Exhibits: LP1-LP7

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT LP1

**This is the document referred to as Exhibit LP1 in the witness statement of
Lisa Parmer dated 22.05.2014**



i) Statement of: Lisa Parmer
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 22/05/2014
v) Exhibits: LP1-LP7

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT LP2

**This is the document referred to as Exhibit LP2 in the witness statement of
Lisa Parmer dated 22.05.2014**



i) Statement of: Lisa Parmer
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 22/05/2014
v) Exhibits: LP1-LP7

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT LP3

**This is the document referred to as Exhibit LP3 in the witness statement of
Lisa Parmer dated 22.05.2014**



i) Statement of: Lisa Parmer
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 22/05/2014
v) Exhibits: LP1-LP7

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT LP4

**This is the document referred to as Exhibit LP4 in the witness statement of
Lisa Parmer dated 22.05.2014**



i) Statement of: Lisa Parmer
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 22/05/2014
v) Exhibits: LP1-LP7

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT LP5

**This is the document referred to as Exhibit LP5 in the witness statement of
Lisa Parmer dated 22.05.2014**



i) Statement of: Lisa Parmer
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 22/05/2014
v) Exhibits: LP1-LP7

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT LP6

**This is the document referred to as Exhibit LP6 in the witness statement of
Lisa Parmer dated 22.05.2014**

i) Statement of: Lisa Parmer
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 22/05/2014
v) Exhibits: LP1-LP7

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT LP7

**This is the document referred to as Exhibit LP7 in the witness statement of
Lisa Parmer dated 22.05.2014**

Exhibits road markings on approach to start line.

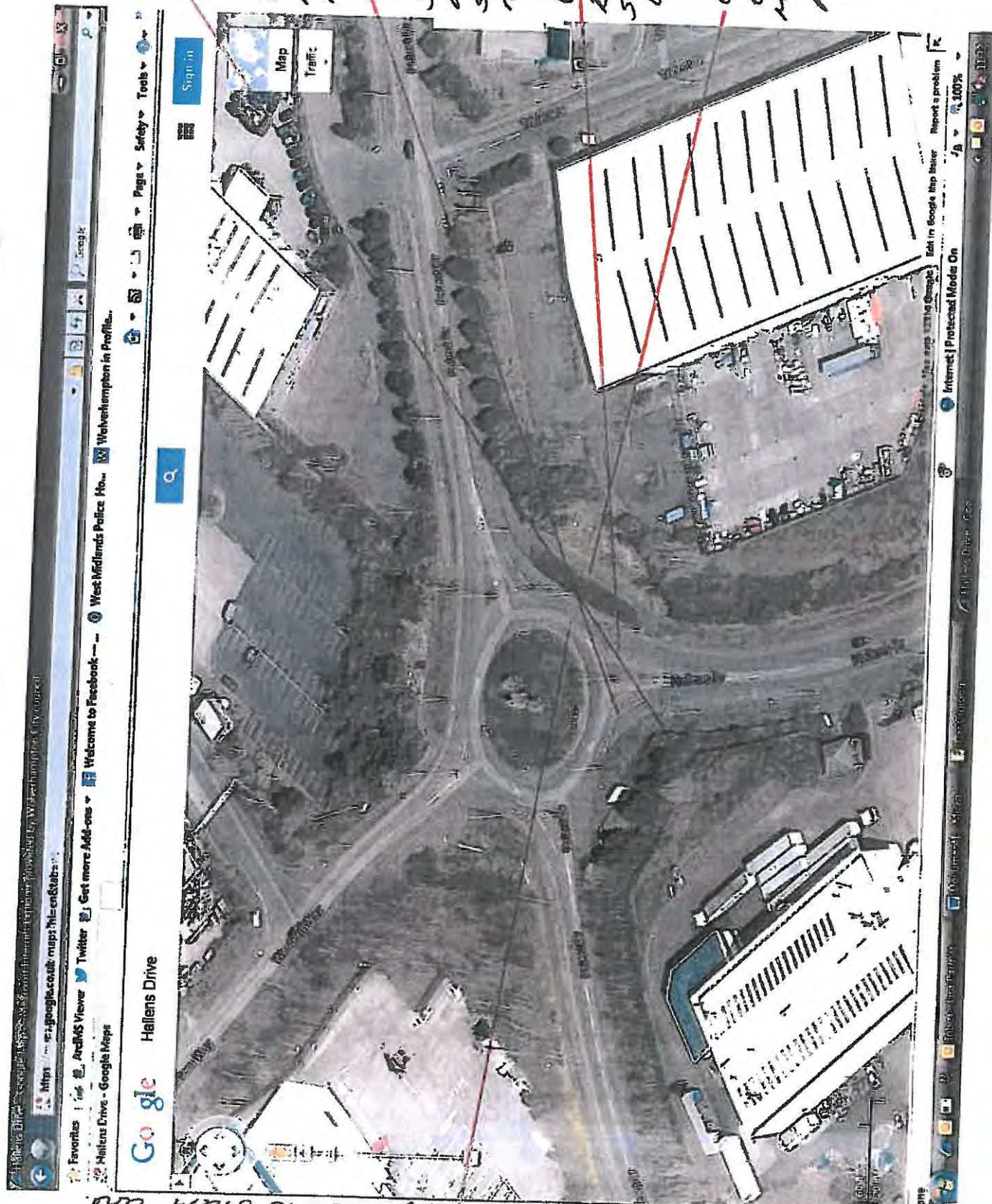


Exhibit 1
Graffiti
and road sign
painted over

Exhibit 2
Markings in
road, 130 max

Exhibit 3
Same location
as Exhibit 2
showing more
road marking

Exhibit 4
Road markings
showing start
line

Exhibit 6
Offensive
marking on
pavement

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN6

This is the document referred to as "Exhibit PN6" in the witness statement of Pardip Nagra dated 19 July 2022.

i) Statement of: Lydia Pulford
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 11.11.2013
v) Exhibits: -

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF LYDIA PULFORD

I, Lydia Pulford, of [REDACTED] Holyhead Road, Wednesbury, WS10 7DQ, WILL SAY AS FOLLOWS:

1. I am a resident living at the above address where I have lived for approximately two years and I live with my partner.
2. When I got here with my partner we started going for walks in the evenings. We would go any evening until we went walking on a Sunday evening when we experienced the boy racers.
3. Our walk consists of going from the island at the A41 Black Country New Road with Patent Drive. From there we would walk down Patent Drive to the next island, left there onto Hallens Drive. We would continue along until the next island, still in Hallens Drive and continue on past Fitness First to Patent Shaft island, again at the A41 Black Country New Road. Basically it's a circular route.

4. From living in the area for the last two years I know that the boy racers use Hallens Drive and Patent Drive to race and meet up. Patent Drive and Hallens Drive are very wide, single carriageway roads with a 30 mph speed limit.
5. Going back to the first Sunday evening when we decided to go for a walk we started to walk down Patent Drive from the A41 Island (downhill) towards Hallens Drive island and completed our circular walk. It was about 16:00-17:00 hours; it was still daylight. As we came out onto the A41 by Fitness First we continued up the A41 on the left hand side. I heard some noisy cars coming up the road from behind us so I remember turning round. There were about six cars in total, they were boy racers because I remember the cars having tinted windows, lowered suspension, etc. They were all small cars like Saxos or Clios.
6. As they drove past I could see that the cars were carrying 4-5 people and each car had their windows down and I remember that one of them was leaning out of the window and we were shouted at in an aggressive manner by this person hanging out of the car. This really took me back and shocked me; to be honest it scared me even though I was with my partner. I think the reason this person shouted was to frighten us and to show off to his mates who were behind them.
7. I have been present in a car as a passenger in Hallens Drive when the boy racers had met on a Sunday evening. This was about 12 months ago, I found it very intimidating because there were mini-motorbikes, cars (lots of them), people all stood at the side of the road watching us and videoing with their phones. It was just horrible. There were hundreds of people and cars parked along Hallens Drive and also up into Moorcroft.
8. Nowadays if it's a Sunday we just don't drive down there and certainly don't walk, so it's correct to say that the boy racers gathering and meeting there has affected how we plan our recreation (walking).

STATEMENT OF TRUTH

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

Full Name: Lydia Pulford

Name of Claimant: Sandwell Metropolitan Borough Council

Signed 

Print Name L. PULFORD

Dated 11 / 11 / 13

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN7

This is the document referred to as "Exhibit PN7" in the witness statement of Pardip Nagra dated 19 July 2022.

- i) Statement of: F Bird
- ii) Statement No: 1
- iii) For:
- iv) Dated: 23.11.14
- v) Exhibits:

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO: A90BM228

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF FENELLA BIRD

I, Fenella Bird of ■■■ St Jude's Road West, Wolverhampton WV6 0TA ,
WILL SAY AS FOLLOWS:

1. I am Fenella Bird and I live at the above address.
2. This statement relates to a frightening experience involving boy racers on the Black Country Route which occurred

on Sunday 16th November 2014 at about 22:20 hours when I was travelling from Bilston along the Black Country Route towards Birmingham New Road.

3. At the time of this incident I was on my own driving my silver Toyota Yaris. On approaching the Black Country Route near the Halfords island, I suddenly became aware of a large group of people standing on the pavement near the island. On exiting the island continuing on my journey I suddenly saw to my right about 5 or 6 cars at speed on the outer carriageway racing and also a vehicle behind me approach with full beam headlights on. This vehicle behind me frightened me so I put my hazard lights on and slowed immediately.
4. At this point I was very scared and started to look for somewhere to park. I again saw lots of further people standing on the road side to my left which was the entrance to SMA Car Auctions. I felt threatened and confused by this vehicle behind me so I turned left into the car auction car park and called the police about the people and car racing on the Black Country Route. I was physically shaking and petrified from this experience which was frightening and horrid.
5. I made the call to the police and waited a few minutes. In that time the crowd in the entrance to the car auction quickly dispersed. I continued on my journey and came to the next exit island which is Sedgemoor Park. I saw a police marked vehicle with its blue lights flashing dealing with one of the vehicles on the Black Country Route.

6. This was a terrible experience which I do not want to go through again. I have been driving for 25 years and have never seen an incident like this before.

7. I have been informed by the police that an injunction is to be asked for later this year in an attempt to stop this happening on public roads. I would support any legal preventative measures that the police take to stop this illegal activity.

STATEMENT OF TRUTH

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

Full Name: Fenella Bird

Name of Claimant: Wolverhampton Metropolitan Borough Council

Signed FABird.

Print Name FENELLA BIRD.

Dated 23-11-2014.

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN8

This is the document referred to as "Exhibit PN8" in the witness statement of Pardip Nagra dated 19 July 2022.

i) Statement of: PC. Jonathan Harford
ii) Statement No: 1
iii) For: Claimant
iv) Dated: 16.11.2013
v) Exhibits: -

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF JOHNATHAN PHILIP HARFORD

I, PC 20135 Harford of West Midlands Police, WILL SAY AS FOLLOWS:

1. I am PC 20135 Harford of West Midlands Police, currently stationed at Bilston Police Station, Railway Street, Bilston, West Midlands.
2. On Sunday 10th March 2013 at approx. 21:30 hours I was on uniformed mobile patrol with PC 20218 Dove when we attended the Black Country Route, Bilston, Wolverhampton to the report of a number of vehicles at the location speeding and racing along the road.
3. We arrived on the Black Country Route and drove up to the Springvale Retail Park where intelligence from previous incidents suggested the cars were gathering. We arrived at the industrial estate and I could see a number of vehicles gathered on the road at the entrance to the retail park called Springvale Way. They were all parked up and at no stage on this occasion did I witness any of the vehicles speeding. Some of the occupants of the vehicles were standing outside and talking to each other.

4. There appeared to be more than twenty vehicles gathered at the location. The vehicles were of all makes and models and some appeared to be modified with alloy wheels and different exhaust systems.
5. I was joined by other officers at the scene and, because of the problems with vehicles speeding along the Black Country Route that had occurred in the previous weeks, a decision was taken to record the details of all the vehicles and occupants present at the scene.
6. As we began to record the details I became aware of a road traffic collision that had occurred between two of the vehicles on Springvale Way. I did not witness the collision occur but as I walked over to the occupants of the vehicles I could see they were discussing the matter and pointing at the minor damage caused to the bodywork of the vehicles. The two vehicles involved were a Blue Peugeot 207, VRM J6YLB and a Red Ford Fiesta, VRM SL08 WWG. Both of the drivers exchanged vehicle and insurance details and then left the scene. No persons were injured during the collision.
7. Following on from this all of the vehicles and occupants at the gathering then left the scene after their details had been recorded by the police officers in attendance.

STATEMENT OF TRUTH

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

Full Name: Johnathan Philip Harford

Position: Police Constable

Name of Claimant: Wolverhampton City Council

Signed

 20135

Print Name JOHNATHAN PHILIP HARFORD

Dated

16/11/13

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN9

This is the document referred to as "Exhibit PN9" in the witness statement of Pardip Nagra dated 19 July 2022.

i) Statement of: *Richard Hardy*
ii) Statement No: *1*
iii) For: *Claimants*
iv) Dated: *06.11.2013*
v) Exhibits: *-*

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

BETWEEN:

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

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF RICHARD HARDY

I, Richard Hardy of [REDACTED] Aldridge Road, Little Aston, Walsall, West Midlands, WS9 0PE, WILL SAY AS FOLLOWS:

1. I am a resident living at the above address.
2. I am the Managing Director of K R Harding Estates Limited who own a large number of properties situated along Brickyard Road and also Empire Industrial Estate, as well as Aldridge Marina – this being a canal boat mooring facility – residential. The following statement relates to gatherings of nuisance vehicles along Brickyard Road, Aldridge.
3. Brickyard Road is the main road that services the above and is also used as a cut through connecting road towards the A461 Lichfield Road. It has a 30 mph speed limit and, as stated, is mainly industrial but also has a small number of residential premises.

4. In my position of owner and landlord I can state that I receive numerous complaints and have personally witnessed on numerous occasions the behaviour of these gatherings over a prolonged period.
5. I would associate the nuisance to be concerned with street racing along the length of Brickyard Road and the behaviour of the persons that this attracts.
6. On these occasions, large numbers of young motorists, that are referred to as "Boy Racers", gather on the communal areas of car parks and factory frontages.
7. This alone creates its own problems regarding litter and on many occasions using the area as a toilet, urinating in the buildings' porches and covered areas.
8. There is also debris left from any damage that has been caused to their own vehicles, the car parks and the buildings, together with oil spillages.
9. We have the continual job of cleaning up general refuse of empty cans, foil wrappers, cigarette packets and other litter following such meetings from the various areas of our estate and disinfecting areas which is unwelcome and adds up to being a costly expense.
10. In addition to the above, street racing occurs along the length of the roadway. At such times "look-outs" have been seen posted at each end of the road and the racing of cars occurs, usually two a breast, utilising both lanes of the road in one direction at the same time.
11. On numerous occasions the private fencing and walls to the junction of Brickyard Road and Northgate Way has suffered damage by the racing vehicles being unable to stop. A private motorway tyre barrier has been installed which itself has suffered damage.
12. We have had to go to the expense of fencing off our own entrance yard at Empire House with costly fencing and gates to prevent the congregating of the vehicles and spectators.

13. This practice is creating a dangerous activity which is quite likely to result in injury to innocent victims who would not be expecting to meet two cars travelling towards them at speed, with at least one in the wrong direction of travel.
14. Other premises have also had to use some form of physical barrier(s) being gates or chains across their entrances which have subsequently been damaged.
15. Our canal boat moorers who live adjacent to the Aldridge Marina boatyard suffer noise nuisance in respect of highly revving engines and tyre screeching which is very annoying to them.
16. Access to properties along Brickyard Road during such "race meetings" is also restricted due to the potential dangers of such events.
17. I wish to complain regarding this matter, and can also, as stated, complain on behalf of my tenants, both residential and commercial.

STATEMENT OF TRUTH

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

Full Name: Richard Hardy

Name of Claimant: Walsall Metropolitan Borough Council

Signed R Hardy

Print Name RICHARD HARDY

Dated 6TH NOVEMBER 2013

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN10

This is the document referred to as "Exhibit PN10" in the witness statement of Pardip Nagra dated 19 July 2022.

i) Statement of: Police Inspector Julie
Mason

ii) Statement No:

iii) For:

iv) Dated:

v) Exhibits:

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF INSPECTOR 5945 JULIE MASON

I, Inspector 5945 Mason of the West Midlands Police, WILL SAY AS FOLLOWS:

1. I am Inspector 5945 Mason of the West Midlands Police currently stationed at Dudley.
2. I have been made aware of issues of car cruising within the Dudley Policing area and although other areas have been targeted, incidents reported in Flood Street car parks in Dudley Town Centre have been the most serious.
3. Since the end of 2011, mainly on Sunday evenings, we have experienced large groups of vehicles and pedestrian onlookers congregating on Flood Street car parks with between 50 and a few hundred vehicles at any one time. Some of these vehicles have committed various offences including driving at excessive speed and dangerous driving on both the roads and car parks with some incidents witnessed by the Police. In addition we and the Council had noise, anti-social behaviour and

litter to contend with and as a result received various complaints from members of the public.

4. Police logs from 6 August 2012 to 6 June 2013 relating to complaints about boy racers are detailed below.
5. Police log 6 August 2012: 50 – 70 cars have met up on Flood Street car park and are racing around.
6. Police log 1 October 2012: In excess of 100 cars have gathered at Floor Street car park, revving of engines.
7. Police log 12 October 2012: Birmingham New Road – ASB driving, speeding, throwing bottles at cars.
8. Police log 28 October 2012: Excess of 200 cars at Flood Street.
9. 2 x Police logs 28 October 2012: Loads of boy racers at car park New Mill Street – it's gridlocked.
10. Police log 5 November 2012: In excess of 60 cars racing around island at New Mill Street/Flood Street.
11. Police log 14 November 2012: Cars blocking road by King Arthur public house.
12. Police log 14 November 2012: Traffic chaos at Birmingham New Road A4123/Priory Road Foxyard. 2 x vehicles have their hazard lights on in the filter lane with their engines running.
13. Police log 3 December 2012: 100 – 150 boy racers on Flood Street car park.
14. Police log 3 December 2012: 2 x calls reporting approximately 250 boy racers at Oakeywell Street, Dudley driving at ridiculous speed around car park and up and down dual carriageway.

15. Police log 7 January 2013: 3 x boy racers in road traffic accident. 2 vehicles failed to stop. Vehicles collided after leaving Flood Street car park. Excess of 100 vehicles at Flood Street.
16. Police log 7 January 2013: In excess of 150 boy racers on Floor Street car park. Organised meet with Japanese cars owners club as advertised on Facebook.
17. Police log 20 January 2013: Two cars blocking road side by side with hazards on.
18. Police log 20 January 2013: Loads of cars have pulled up alongside each other on the hill at Blowers Green Road, Dudley and all talking to each other and blocking the road.
19. Police log 13 March 2013: Erratic driving from boy racer on Castle Hill, Dudley.
20. Police log 24 March 2013: 150 vehicles at Flood Street.
21. Police log 7 April 2013: 50/60 modified cars racing around Flood Street car park and nearby roads.
22. Police log 14 April 2013: 20 boy racers at Birmingham New Road/Sedgley Road West – caller says this happens every week.
23. Police log 28 April 2014: 2 x calls of 200 boy racers racing on underground car park at Tesco Burnt Tree. Cars doing doughnuts and speeding.
24. Police log 28 April 2014: Approximately 100 boy racers gathering at Flood Street car park.
25. Police log 28 April 2014: Boy racers coming down from Castle Gate island, spinning around at the junction.
26. Police log 16 June 2013: Flood Street, Dudley, modified vehicles with big wheels, exhausts, speeding in groups of 4 – 5, doing 70-80 mph on 40 mph road.
27. Police log 16 June 2013: boy racers racing at Beans Road, Tipton.

28. There is also a new housing development currently under construction adjacent to Flood Street which will be severely impacted upon should these events be allowed to continue.
29. There was no named organiser with events being organised through social media and because of the uncertainty of when they might occur we had no way of gauging an appropriate response.
30. In addition to this we had a group of Japanese car enthusiasts known as the JDM collective congregating on the Flood Street car parks on Sunday evenings once a month with up to 400 cars attending at any one time. This group advertised their meetings via social media and their own website jdmcollective.co.uk. They were very organised with a named co-ordinator, professional photographers, vendors selling refreshments and their own marshalls who would only let Japanese car owners onto the car parks.
31. The organiser accepted that his event was attracting additional 'car cruisers' who were coming to and from the event along public roads and blatantly disregarding the law. He is currently seeking a private location for his meetings.
32. Various policing tactics have been utilised to tackle the issues but experience has shown that enforcement of the Road Traffic Act will deal with a small number of offenders but will not stop in my view the large numbers congregating. To deal with these large numbers we would need a large number of officers which is clearly not sustainable.
33. We have previously deployed a large number of officers which has prevented most of the activity in the area but this has then led to us pushing the problem over to another policing area. Providing a small number of officers has simply been ineffective in addressing issues affecting the wider road network.
34. The Police have a variety of priorities that are severely affected by the redeployment of officers to police these events and there is a large cost implication that also needs to be considered.

35. As a medium term solution, Dudley Metropolitan Borough Council agreed to staff locking down the car parks each Sunday evening using barriers that were permanently fixed to the entrances/exits of the car parks. These barriers had been constructed several years ago due to previous car cruising issues.
36. This has worked very well for the last 5-6 months reducing incidents and enabling Police Officers to be more appropriately deployed but I am led to believe that this is not a long term measure. Together with this, other neighbouring Police areas have deployed a pro-active approach to car cruising.
37. Car cruising and the subsequent inappropriate use of public roads and car parks by car drivers, motorbike riders and onlookers has led to many serious incidents in the Dudley Borough and there have been several fatal and life changing collisions.
38. I have concerns that displacement from other Local Authority areas could cause significant issues if Dudley does not progress with an injunction application and our neighbouring authorities do. I believe that an injunction would be a powerful long term strategy that could, where appropriate, lead to enforcement. An injunction could deal with those meeting in large numbers in addition to those driving inappropriately.

STATEMENT OF TRUTH

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

Full Name: Julie Mason

Position: Police Inspector

Name of Claimant: Dudley Metropolitan Borough Council

Signed 

Print Name J. MASON

Dated 23/7/14

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN11

This is the document referred to as "Exhibit PN11" in the witness statement of Pardip Nagra dated 19 July 2022.

This is in fact video footage which is available separately.

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

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

CLAIM NO:

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(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN12

This is the document referred to as "Exhibit PN12" in the witness statement of Pardip Nagra dated 19 July 2022.

From: Lisa Fox <foxlisa623@gmail.com>
Sent: 17 April 2021 23:43
To: Joanne Mason <Joanne.Mason@wolverhamptonhomes.org.uk>
Subject:

Hi jo.

Racing like mad at minute down black country route. Saturday 17th 23.30

From: Lisa Fox <foxlisa623@gmail.com>
Sent: 19 April 2021 09:08
To: Joanne Mason <Joanne.Mason@wolverhamptonhomes.org.uk>
Subject: Re:

Hi jo. They was racing again last night around midnight.

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

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

CLAIM NO:

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

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN13

This is the document referred to as "Exhibit PN13" in the witness statement of Pardip Nagra dated 19 July 2022.



BREAKING NEWS: West Midlands heatwave: Met Office's first ever red warning for extreme heat

Teenage police chase suspect released as investigation into Wolverhampton bike meet continues

By [Nathan Rowe](#) | [Bushbury](#) | [Crime](#) | Published: Apr 12, 2022

A teenager who was arrested after a stinger brought a police chase to an end has been released under investigation.

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The bike was written off in the crash

The chase ensued when two riders fled police at a bike meet in the Bushbury area of Wolverhampton on Sunday.

Two bikes at the organised meet failed to stop for officers and went on to run red lights, drive off road and weave in and out of cars during a police pursuit.

They were tracked by a police helicopter to Elston Hall Lane, one-and-a-half miles away, and brought to a halt by a stinger.

One of the bikers got away but one suspect, aged 17, was arrested after the bike he was allegedly riding crashed into a car.

He was arrested on suspicion of dangerous driving, theft of a motor vehicle, failing to stop and driving under the influence of drugs, but has since been released under investigation as further enquiries are carried out.

The teenager was not injured but police said the bike he was riding, which was allegedly stolen in Wolverhampton last month, was written off in the crash.

One local who said they saw the chase while driving through the area described the riders as "silly boys".

"We couldn't believe what we had just witnessed."

One other bike was arrested at the meet which was attended by around 40 people.

Crime

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By [Nathan Rowe](#)
Reporter - [@NRowe_Star](#)
Trainee reporter at the Express & Star.

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<https://www.expressandstar.com/news/crime/2022/04/12/teenage-police-chase-suspect-released-as-investigation-into-wolverhampton-bike-meet-continues/>

Express & Star

Teenage police chase suspect released as investigation into Wolverhampton bike meet continues

By Nathan Rowe Bushbury Crime Published: Apr 12, 2022

A teenager who was arrested after a stinger brought a police chase to an end has been released under investigation.



The bike was written off in the crash

The chase ensued when two riders fled police at a bike meet in the Bushbury area of Wolverhampton on Sunday.

Two bikes at the organised meet failed to stop for officers and went on to run red lights, drive off road and weave in and out of cars during a police pursuit.

They were tracked by a police helicopter to Elston Hall Lane, one-and-a-half miles away, and brought to a halt by a stinger.

One of the bikers got away but one suspect, aged 17, was arrested after the bike he was allegedly riding crashed into a car.

He was arrested on suspicion of dangerous driving, theft of a motor vehicle, failing to stop and driving under the influence of drugs, but has since been released under investigation as further enquiries are carried out.

The teenager was not injured but police said the bike he was riding, which was allegedly stolen in Wolverhampton last month, was written off in the crash.

One local who said they saw the chase while driving through the area described the riders as "silly boys".

Anna-Maria Sutton said: "My husband and I were waiting at a red light by the Chapel Ash island on the ring road when two bikes ran the red light at high speed, if they had been a few seconds earlier they would have hit a car going around the island.

"We couldn't believe what we had just witnessed."

One other bike was arrested at the meet which was attended by around 40 people.



By Nathan Rowe

Reporter@NRowe Star

Trainee reporter at the Express & Star

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN14

This is the document referred to as "Exhibit PN14" in the witness statement of Pardip Nagra dated 19 July 2022.

To whom it may concern,

Regarding the Black Country Car Cruising Injunction, I wish for the following to be taken in to account:

I Councillor Linda Leach have served the Bilston North Ward as a Local Councillor since 2010.

Since I've been elected, I have received many complaints from concerned residents about Car Cruising.

The roads mainly affected are: Prouds Lane, Moseley Road, Green Park Avenue. Green lanes, Park View Road, Park Meadow Green, Worsley & Hadley Road & the Black Country route.

These roads are residential and also contain primary schools (Prouds Lane, Green Park Avenue) as well as small shopping areas that residents and families shop at.

In recent years whilst the injunction was in place noise nuisance and ASB complaints dropped dramatically, however since the injunction was removed the complaints and concerns have risen.

Most of the complaints are around an evening on weekdays but also on weekends.


I am concerned that this is unfair to residents and affects their quality of life, particularly in the summer months when it can become unbearable but also, I am concerned at the risk posed to young people who often visit parks and open spaces as well as shops.

I am fully supportive of the re-introduction of an injunction to help enforce the ban on car cruising. I genuinely believe this would make our streets safer and uphold the quality of life that we should all be entitled to and expect.

Kind Regards

Linda

Councillor Linda Leach
Cabinet Member for Adults
Labour Councillor for Bilston North Ward


Linda.leach@wolverhampton.gov.uk

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
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Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN15

This is the document referred to as "Exhibit PN15" in the witness statement of Pardip Nagra dated 19 July 2022.



HOUSE OF COMMONS
LONDON SW1A 0AA



By Email to
Ms Sarah White
Anti Social Behaviour Team Leader
Wolverhampton Homes

Our Ref: PM28344

31 May 2022

Dear Sarah

Re: Car Cruising injunction.

I am very concerned about the car cruising across the region especially in my constituency. Before the injunction was received in 2014 I was regularly getting emails and letters from my constituents about the noise and nuisance from these young racers. When the injunction came into place the complaints mainly stopped.

Recently I have been receiving complaints mainly from constituents who live in Ettingshall Park that the car cruising has started again. I would support a new injunction so as to alleviate the nuisance to my constituents.

Yours sincerely,

**Rt Hon Pat McFadden MP
Wolverhampton South East**

Crescent House, Broad Street, Bilston, WV14 0BZ

Telephone: 020 7219 4036
or 01902 405762

Email: patrick.mcfadden.mp@parliament.uk
Facebook: [@patmcfaddenwolverhampton](https://www.facebook.com/patmcfaddenwolverhampton)
www.patmcfadden.com

Twitter: [@patmcfaddenmp](https://twitter.com/patmcfaddenmp)
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i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
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(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN16

This is the document referred to as "Exhibit PN16" in the witness statement of Pardip Nagra dated 19 July 2022.



NICOLA RICHARDS MP

WEST BROMWICH EAST

NICOLA.RICHARDS.MP@PARLIAMENT.UK

0121 553 6897

19 HIGH STREET
WEST BROMWICH

B70 6PJ

25 April 2022

To whom it may concern,

I am writing on behalf of my constituents in West Bromwich East to express my support for an injunction banning car cruising in the Black Country.

I hear regularly from many constituents about the issues they are experiencing with dangerous car cruising and street racing in my constituency. For example, the residents of Kenrick Way and the surrounding area in West Bromwich are regularly affected by noisy cars, large gatherings and dangerous driving on an evening. The events described to me by constituents are alarming, with clearly organised races taking place on West Bromwich's streets, with large numbers of spectators watching the race, and a well-oiled organisation working to frustrate the police's attempts to control this behaviour and evade arrest.

Since the expiration of the previous injunction, these issues have worsened and there is serious concern amongst residents and law enforcement that this could lead to a serious incident in the future involving drivers, spectators or innocent by-standers.

The issue is not just confined to West Bromwich either, with constituents in other areas of my constituency reporting excessive speeding, street racing and dangerous driving in Great Barr.

In total, 649 constituents of West Bromwich East have signed my petitions related to car cruising or speeding cars in the area, demonstrating that this is a significant issue that is affecting the day to day lives of my constituents.

An injunction would ensure our police have all available tools in the fight against this dangerous behaviour. On behalf of my constituents, I ask that you strongly consider granting an injunction.

Yours sincerely,

Nicola Richards MP
Member of Parliament for West Bromwich East

From The Black Country. For The Black Country.

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
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(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN17

This is the document referred to as "Exhibit PN17" in the witness statement of Pardip Nagra dated 19 July 2022.

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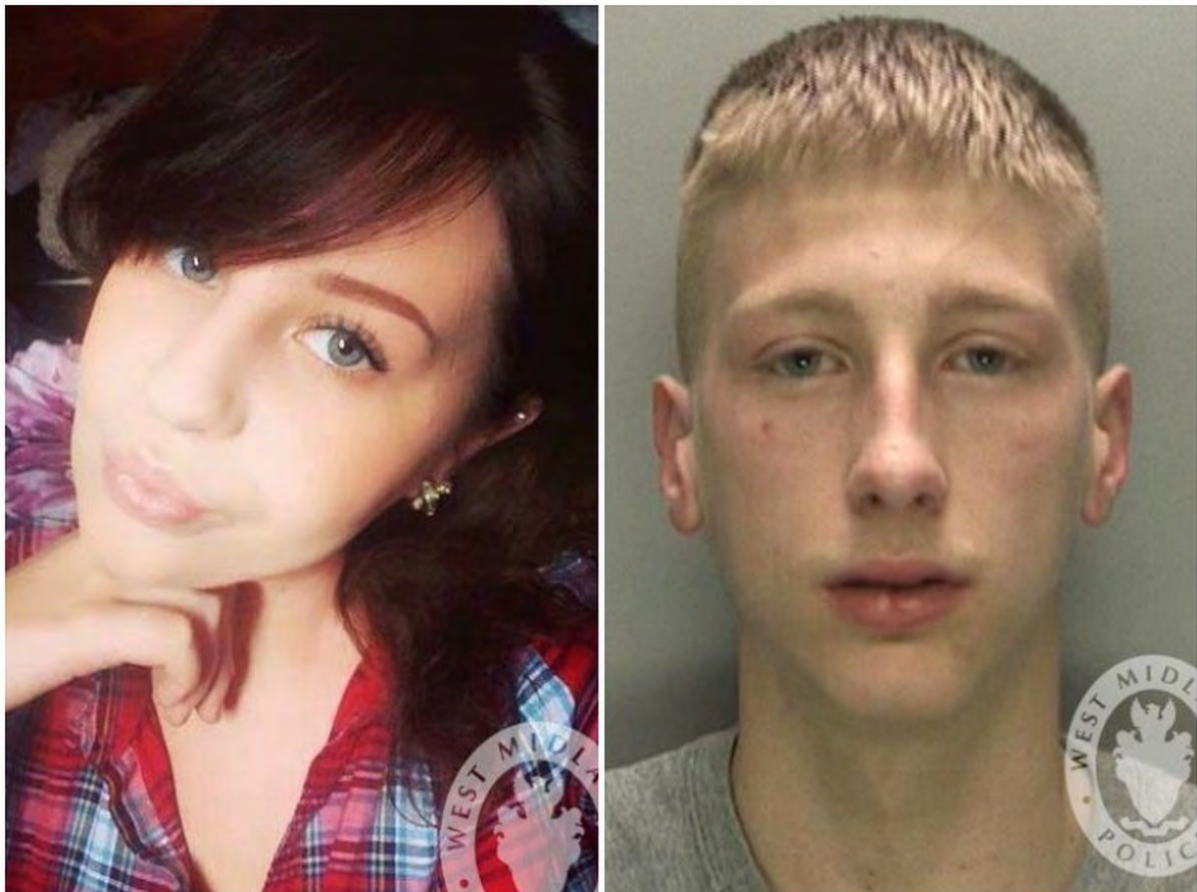
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Express & Star

Ellie Underhill: Seven-year sentence for driver after car bonnet fall death

By Marion Brennan Dudley Crime Published: Aug 15, 2018 Last Updated: Aug 15, 2018 [9 Comments](#)

Ellie Underhill died days after falling from the bonnet of a car driven outside Tesco Extra in Dudley on Boxing Day 2016



Ellie Underhill, and right, Luke Hickman

A teenager who caused the death of a friend when she was thrown from the bonnet of his car outside a supermarket as a prank has been locked up for almost eight years.

Luke Hickman drove at speeds of 30-40mph with Ellie Underhill clinging on to the windscreen wipers until a handbrake turn sent her hurtling to the ground, causing extensive head injuries, a court heard.

But instead of calling an ambulance or taking her to nearby Russells Hall Hospital, Hickman, 19, and two others drove her to a McDonald's further away where they tried to clean her up with tissue.

It was not until an hour and 13 minutes after the incident on Boxing Day 2016 that Miss Underhill was admitted to hospital.

She died from her injuries in hospital a few days later.



Left to right: Ross Bingham, Elly Phillips and Hana Edwards

Staff were told she had fallen after drinking, with 19-year-old Elly Phillips doing most of the talking, said prosecutor Mr Robert Price.

Hickman, Phillips and Ross Bingham, 21, who had all been at the Tesco Extra car park on Birmingham Road in Dudley that night, then went to Miss Underhill's home in Brierley Hill to tell her parents she was in hospital, Stoke on Trent Crown Court heard.

West Midlands Police said that the group repeatedly lied to the family and even visited Ellie's family on several occasions over a number of days.

The friends even accompanied Ellie's brother to show him where Ellie had allegedly fallen.

However the pressure got too much for them and, over a week after the incident, Bingham opened up to her brother to reveal exactly what had happened.

The family appealed for information on social media and on January 5 Phillips and Bingham were arrested.

When asked why it took so long to get her to hospital, police say Hickman made up an excuse that he was doing a drugs 'drop off'.

Hickman's girlfriend Hana Edwards, 19, texted him to warn him to delete his messages.

Sentences

Hickman, of Wassell Road, Wollescote, Stourbridge, admitted causing death by dangerous driving and a further count of dangerous driving and associated charges on June 6.

Phillips, of Seymour Road, Wollescote; Bingham, of Hagley Road, Edgbaston, and Hickman admitted conspiracy to pervert the course of justice.

These three were sentenced on Tuesday.

Hickman was sentenced to seven years and 10 months in a young offender's institution, Phillips got six months in a young offender's institution, while Edwards of Grove Road, Wollescote, was given an 18-month community order and 150 hours of unpaid work after admitting perverting the course of justice.

Bingham was sentenced to four months in prison on Wednesday.

'A loving and vibrant life'

The family of Ellie have paid tribute to their daughter, "We have waited since the 26 December 2016 for this day and no matter what the sentence is, justice will never be served.

"Contrary to reports in the media, we as her family would like it to be known that none of the defendants informed us as her family, the emergency services or the police of the true events that actually occurred that night.

"This ultimately delayed any important and immediate medical attention which should have been provided to our daughter.

"The actions and lies of those involved are unforgivable and no family should ever have to go through this.

"The laws concerning our daughter's death are outdated and need modernising for today's society as soon as possible to stop anymore untimely young deaths.

"Such a loving and vibrant life was taken from us far too soon. We love you Ellie and you are truly missed. God bless."

Sergeant Alan Wood from the Serious Collision Investigation Unit said: "This is a tragic case where a young woman has sadly lost her life following a night out celebrating.

“Following a highly dangerous act resulting in appalling consequences, these three decided against telling the truth, choosing instead to cover up what actually happened with utterly disgraceful lies in an attempt cover up what was a serious crime.

“Our thoughts remain with Ellie’s family who have had to suffer the consequences both of the actions of Hickman and the callous lies told afterwards. Although no sentence will bring Ellie back, I hope it is offers some comfort to them and can help them rebuild their lives.”

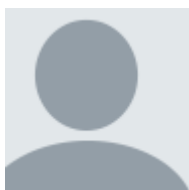


By Marion Brennan

@Marion_EStar

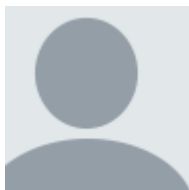
News and features reporter, specialising in human interest and local history stories.

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Ian109 • 4 years ago

What a vile bunch of people how could anyone do that to anyone. & a friend is unthinkable the girls look evil & should of been given longer sentences I hope they suffer everyday of there lives for what they did to that poor girl selfish evil individuals who killed her & tried to hide it just shows how sly they are



Crescendo • 4 years ago

Yes, I agree with "Thehoffsleftsock" comment below. An explanation on why comments on some items are not allowed please.



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scum



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Yet another laughable seven-year sentence for the extinguishing of a precious, young life. Still, it doesn't affect the judge's cosy little life in any way, so why would he care? Yet another travesty of 'justice' that does absolutely nothing to instill confidence in the public.

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[WolvesGuru](#) • 4 years ago • edited

What a complete bunch of knobs and cowards.

Your friend was hurt take her to a Doctor or Hospital as most sane people would, rather than thinking of saving your own skins first.

Driving a car with the victim on the bonnet, beggars belief and words really, utter stupidity and smacks of having a laugh, or impressing your mates, bigging yourself up...typically whats wrong with some teenagers and gangs these days. Deserve everything you get.



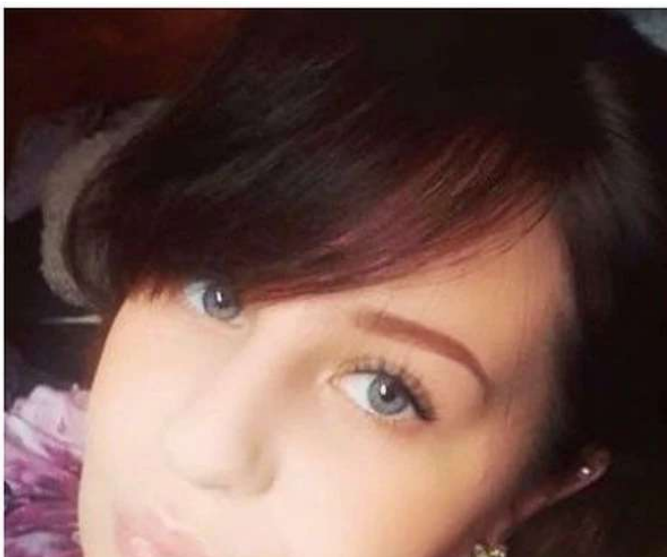
Ellie Underhill: Seven-year sentence for driver after car bonnet fall death

By [Marion Brennan](#) | [Dudley](#) | [Crime](#) | Published: Aug 15, 2018 | Last Updated: Aug 15, 2018 |  9 Comments

Ellie Underhill died days after falling from the bonnet of a car driven outside Tesco Extra in Dudley on Boxing Day 2016

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Ellie Underhill, and right, Luke Hickman

A teenager who caused the death of a friend when she was thrown from the bonnet of his car outside a supermarket as a prank has been locked up for almost eight years.

Luke Hickman drove at speeds of 30-40mph with Ellie Underhill clinging on to the windscreen wipers until a handbrake turn sent her hurtling to the ground, causing extensive head injuries, a court heard.

But instead of calling an ambulance or taking her to nearby Russells Hall Hospital, Hickman, 19, and two others drove her to a McDonald's further away where they tried to clean her up with tissue.

It was not until an hour and 13 minutes after the incident on Boxing Day 2016 that Miss Underhill was admitted to hospital.

She died from her injuries in hospital a few days later.



Left to right: Ross Bingham, Elly Phillips and Hana Edwards

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"This ultimately delayed any important and immediate medical attention which should have been provided to our daughter.

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"The actions and lies of those involved are unforgivable and no family should ever have to go through this.

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[@Marion_EStar](#)

News and features reporter, specialising in human interest and local history stories.

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i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
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B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN18

This is the document referred to as "Exhibit PN18" in the witness statement of Pardip Nagra dated 19 July 2022.

Police called to illegal Thurrock car meet that attracted around 450 cars in 'blatant breach' of Covid-19 regulations

Officers warned the car cruisers to go home or face having their vehicles seized.

NEWS

BY

Mel King Content Editor

- 07:49, 5 APR 2021



The Manorway in Thurrock was one of the places the car cruisers went to (Image: Google Maps)



Hundreds of cars attended an illegal car meet in Essex over the Easter Bank Holiday weekend.

Yesterday evening (Sunday, April 4), a large group of coronavirus rulebreakers met up in the car park of Sainsbury's in **Chelmsford**, then proceeded to move onto The Manorway in **Thurrock**.

Essex police officers were made aware of the large car meet and quickly attended the scene to disperse the drivers. The officers warned the car cruisers to go home or face having their vehicles seized.

When officers arrived, they found up to 450 cars illegally attending the car meet, which is against current government's coronavirus regulations.

Last night, Chief Inspector Richard Melton, District Commander for **Thurrock** said: "If you come to Thurrock this evening and take part in a car cruising event you could have your car seized.

"Our partners at Thurrock Council have put additional measures in place, such as a public space protection order (PSPO) which give us increased powers to deal and disperse these events.

"And we have additional resources available to us this weekend meaning if you come here, we have the manpower to deal with you.

"If you go somewhere else in the county, we'll be there too."

"This meet would be a clear and blatant breach of the Government's Covid-19 regulations"

Chief Insp Melton added these events can pose a risk to those attending and to the public: "We know that when these events take place, there are some of those involved who will drive anti-socially and sometimes drive dangerously.

"This puts them at risk as well as members of the public.

"Additionally, this meet would be a clear and blatant breach of the Government's Covid-19 regulations so if you attend, you can face a fine.

"Our message is clear: If you're planning to meet, don't. Go home. You could have your car seized, you could face a fine for breaching Covid-19 regulations, and we have the resources available to deal with you."

We have contacted Essex Police for an update on this incident and will be bringing you the very latest information when we get it.

Conversation

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Why is there the assumption everyone has a Smart phone? I recently had text on my mobile phone "inviting" me to make 2nd appointment for covid jab but couldn't do it on my old mobile. My wife couldn't do it for me on her (old) Smart phone so I am left with no instructions or way of making a 2nd appointment. After speaking to NHS 119 for 20 mins, they eventually suggested forwarding my text t wife's phone and for to book it to me. Trouble then was, it was for another day involving a second visit to the covid centre!!

REPLY 0

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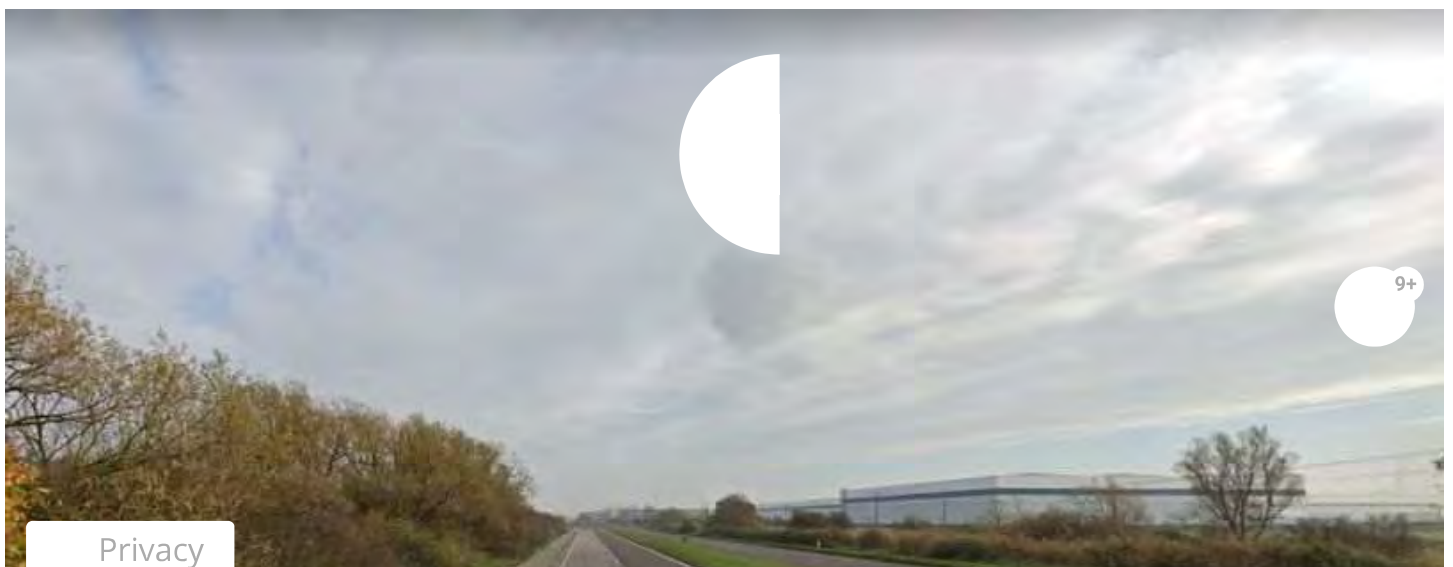
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EXHIBIT PN19

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Councils and police seek new ban on street racing in region

Released: Monday 4 July, 2022

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

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

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

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

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

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

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

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

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

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

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

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

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

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

ENDS

Notes to editors:

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

- **Issued by the City of Wolverhampton Council's Corporate Communications Team.**
- **For more information, please call 01902 555439.**
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i) Statement of:	Ch.	Supt.	Ian
	Green		
ii) Statement No:	1		
iii) For:	Claimants		
iv) Dated:	July 2022		
v) Exhibits:	-		

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

**PERSONS UNKNOWN ENGAGING IN DANGEROUS DRIVING AND
ASSOCIATED ACTIVITIES**

Defendants

WITNESS STATEMENT OF IAN GREEN

I, IAN GREEN, Chief Superintendent of West Midlands Police currently stationed at West Bromwich Police Station, WILL SAY AS FOLLOWS:

1. I am the Force Lead for Operation Hercules which is the West Midlands Police (WMP) response to illegal street racing and road safety. I have been the lead since 2018 having set up the Operation in Birmingham. WMP are absolutely committed to preventing fatalities and accidents on our roads and to reduce and target those who drive recklessly and endanger lives and commit Anti-Social Behaviour and Operation Hercules is our strategic and tactical response to tackle these issues.
2. Nationally the issues are addressed by each force in different ways with many utilising Road Traffic Legislation or civil enforcement powers through PSPOs or injunctions. WMP and local authority partners, have previously utilised injunctions due to the geographic areas that are targeted by the racers and organisers. This has been through injunctions across the Black Country, Solihull and Birmingham.

3. WMP have approached this in a number of ways:

- a. We have utilised the injunction to enforce against the groups in the past with some success, but this has required large scale operations being implemented and run on peak offending days and times to try to disrupt the illegal activity. These resources are often drawn away from core business to tackle this issue.
- b. We have increased patrol activity in main affected roads to try to gather information and intelligence of activity and those involved.
- c. WMP have sent out joint communications across media and social media around the dangers of illegal street races and the potential punishments and enforcement.
- d. Most recently we have adopted a systematic approach to those who are involved. Evidence will be gathered through various techniques and on the 3rd occasion an individual is sent a warning letter (detailing all the legislation and possible sanctions against them) asking them to stop joining in with suspected illegal activity. If the behaviour continues they are then sent a further letter informing them that both their housing / tenancy will be reviewed due to the ASB and that their insurance company is being notified as to their street racing activity. After a 3rd occasion they are either then issued with a Community Protection Notice which directs them to stop the activity or sends them on a new diversionary course led by West Midlands Fire Service. If this is then breached then a Community Protection Order is served with the potential of arrest and a criminal charge being laid against them.

4. Each measure alone has an effect to reduce the activity but individuals will quickly learn or adapt to the policing but with all the elements in place it allows a proportionate policing response to the threats and risk posed dependent on the activity. The previous period with the injunction allowed police to enforce robustly when extreme and dangerous activity was taking place. At times there has been hundreds of individuals lining roads whilst drivers carry out burn outs and drag races past them without regard for the safety of the public or those spectating or in the vehicles.

5. Activity has continued to take place even during the pandemic period and was in fact encouraged on social media during the lock down as they knew there would be less people on the roads. This issue affects every community across the WMP area and there are several Members of Parliament who work alongside WMP to ensure a robust response due to the impact on their communities.
6. Without the injunctions we risk those, who are intent on committing danger on our roads, to continue to carry out their activity with a limited ability to enforce against them. We have previously attempted to design out the issues with road safety furniture being installed only to see the organisers and attendees simply move to another stretch of road meaning the cost of work is disproportionate and merely moves the issue.
7. This is a key priority for WMP as we are trying to prevent the sort of incidents we have seen in Stevenage and Birmingham, where lives are lost for such an irresponsible activity. The residents affected by these gatherings are suffering significant mental health issues due to engines revving and cars racing up and down and feel scared to go outside. We have also seen and interacted with people as young as 13yrs or 14yrs at these races and we have intelligence around drugs being openly sold and consumed during race meetings.

Statement of Truth

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

Signed



Date

19/07/2022

Print name in full Chief Superintendent Ian Green (1218)

i) Statement of: PC MARK
CAMPBELL
ii) Statement No: 1
iii) For: Claimants
iv) Dated: July 2022
v) Exhibits: Exhibit MRC1 –
MRC3

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

**PERSONS UNKNOWN ENGAGING IN DANGEROUS DRIVING AND
ASSOCIATED ACTIVITIES**

Defendants

WITNESS STATEMENT OF MARK CAMPBELL

I, MARK CAMPBELL, Police Constable 6018 of West Midlands Police currently stationed at Chelmsley Wood Police station, will say as follows:

1. I am PC 6018 Campbell and I am making this statement on behalf of the West Midlands Police in support of the claimant's application for an Injunction in relation to Street cruising within the Black Country local authority area. I have been a Police officer for 25 years and have worked on a number of specialist teams.
2. I am now the subject lead for Operation Hercules which is the West Midlands Police tactical approach to street cruising, which over the last couple of years has become a growing issue. I have been the

West Midlands lead on this subject for approximately 3 years, and in that time, I have witnessed the organised approach that organisers take in facilitating such events. I have had a leading role in a number of different approaches to tackle the issues that street cruising causes. This application however is made knowing the positive impact which a further injunction would have in supporting the Police to tackle the unlawful behaviour of the individuals who put the public at risk on an increasingly frequent basis.

3. Operation Hercules has been set up by the West Midlands Police as a strategic response to organised street cruising that takes place across the region. During the events numbers of vehicles, including Cars, motorcycles and Quad bikes, congregate together often in car parks or other open spaces to race or show off their vehicles. They then travel as a group to a section of road where some of these drivers, watched by spectators, race at high speed, behave in an anti-social manner, and perform dangerous stunts this includes drifting.
4. Drifting means, when a vehicle is driven around a roundabout or a bend in a road at such a high speed that that traction is lost between either the rear tyres or the front tyres and the road surface, therefore forcing the vehicle into a skid which is controlled by some acceleration together with steering action into the direction of the skid. These opposite forces cause the vehicle to drift around the bend or roundabout on the absolute edge of the vehicle's handling capabilities. Should the driver lose control of the vehicle at this point, due to a blown tyre or loss of grip from the tyres, a collision would be highly likely.

5. Given the fact that street-cruising involves a large number of vehicles and spectators it poses a very serious risk to public's safety not only to the individual who are often standing both on and off the carriageway watching in very close proximity and encouraging these activities, but also to other road users going about their business.
6. In my experience there is never any kind of stewarding or marshalling of the spectators and again this significantly raises the threat, harm and risk factors relevant to those individuals. It is only a matter of time before the high-speed driving involved in the organised races leads to a multiple fatality incident. This may be the driver of the vehicle, an innocent member of the public driving along this stretch of road or any number of spectators actively taking part on the street cruising meet.
7. Organised meets are now taking place throughout the week and on weekends. It is likely that not before too long these meets will become a daily occurrence in the Black Country and surrounding areas. The race meetings are becoming increasingly well organised with only a few key individuals at the heart of organising them. I will deal with this issue in more detail below.
8. In April 2021 officers from the Operation Hercules team identified 4 main car cruising organisers, who were organising and attending illegal car cruising meets. Members of the Operation Hercules obtained and executed 9 search warrants on these suspected organisers home addresses and their vehicles. The warrants were obtained under Conspiracy to Cause a public nuisance legislation

as it was believed that the following individuals were directing hundreds if not thousands of followers to attend various locations throughout the Black Country causing a public nuisance.

9. The Magistrates were supportive of the warrants, and it is expected that more warrants will be executed going forwards. The volume of evidence against the individuals obtained from officers and via intelligence was substantial, and during the searches a large amount of electrical recording devices were seized and downloaded. It was clear from the start that the organisation of the car cruising meets was via social media, hence the phones, laptops and other recording devices were seized.
10. Between the 4 organisers they have over 40000 followers. Seeking to deal with street cruisers in this manner places a significant demand on Policing teams and where the number of attendees is high, it can result in a high risk to all involved.
11. On numerous occasions I have policed the street cruises throughout the Black Country, Birmingham and the greater West Midlands area, during these meets I have witnessed 400 plus vehicles parked either in a car park or more worryingly on a stretch of dual carriageway such as Black Country Route or Manor Way. The potential for a very serious collision is massive, just because of the speed some of the vehicles will race at. However, when Police are called to attend these meets the street cruisers will drive off in a chaotic manner, over central reservations, along footpaths sometimes travelling the wrong way down a dual carriageway into

oncoming vehicles. It is only a matter of time before this will result in a fatal collision.

12. These meets have a knock-on effect in that high numbers of officers are required to Police the street cruisers' meet, the teams are not therefore providing Policing to other parts of the community. In addition, other teams across the Policing structure such as Force Traffic, Operations Dog units, Operational support units, Force support, drone Teams and National Air service (Helicopter), to name a few are often required to intervene and add support. Not only is the cost of policing these events huge, but the price paid by communities including residents and businesses are incalculable. They are exposed to a high level of harm, noise, intimidation, disruption and frankly torment, threats made to innocent members of the public is taking place all too often.

13. I have personally spoken to members of the public who are at their wits end wanting to move from the area, one even had suicidal thoughts of the constant noise and intimidation, one individual was assaulted and robbed of their mobile phone after approaching a group of street cruisers performing stunts.

14. It is abundantly clear that the risk posed to the public in terms of their safety and also their mental health is very high. This applies to those participating, watching and organising events, but also to those taking part, simply living or working nearby or even just driving past at the wrong time. There is little doubt that without intervention this is a disaster waiting to happen, there will be a

serious collision in which people are very likely to be seriously injured or killed.

15. This has been demonstrated recently in Stevenage, Hertfordshire. On the 18 July 2019 a collision occurred at a street cruising event which sadly resulted in one person suffering life changing injuries and 16 others being injured. The fact that no one was killed was purely down to luck. The two drivers involved in that collision were charged with dangerous driving, together with other offences, one received a 5-year sentence and a large disqualification, and the other driver received a 4-year sentence together with a large disqualification.

16. I have produced a DVD, which I can produce as “**EXHIBIT MRC1**”. This has been downloaded from the court footage from the street cruising meet in Stevenage, in which two street racers collide on a stretch of road and then both vehicles collide with 17 spectators. This is a very descriptive example of how these street cruising meets can go dramatically wrong and is the exact reason for the obtaining of a new injunction. The footage is quite shocking in its content, but this is the real nature of what takes place and shows the dangers not only to the drivers, but the spectators.

17. These collisions again only highlight the burden placed on the Criminal justice system, Courts and Her Majesty's Prison service. More to the point, bringing criminal proceedings requires an incident to have occurred. The aim of all of those involved with the making of this application is to prevent such incidents occurring in the first place.

18. Unfortunately for the West Midlands Police, Local authorities and the general public, the Black Country has become one of the street-racing hot spots of the Country. And it is therefore vital that action is taken to replace injunctions that have previously been granted before an inevitable serious incident takes place, such as described above.
19. An injunction will without doubt aid in the policing and prevention of street cruising. It is a highly valuable and a tried and tested means of prevention and resolution. There is not a "One size fits all" approach to this issue, but an injunction with a power of arrest is an essential part of the collaborative approach needed to reduce the numbers involved and help deter those on the periphery along with giving the Police and the local authority the powers to deal with offenders determined to engage in unlawful behaviour. In my experience, there is no other remedy available to the authorities, which has the effect of preventing street cruising from taking place, as the injunctions obtained by various local authorities in the West Midlands over the past 11 years have been proven to do.
20. I have produced a compilation DVD featuring footage from Police sources, highlighting the dangers caused by the Street cruisers and the ability of Police to try to Police these meets. I can produce this compilation DVD as marked as "**Exhibit MRC2**". It comprises the following clips of footage.

Clip 1 contains footage of a Police pursuit of a Vauxhall Corsa along the Black Country Route, highlights the danger of the

speeding vehicle to the spectators and parked vehicles lining the roundabouts to view the street racing.

Clip 2 contains footage from an unmarked Traffic vehicle of a White BMW drifting around the Waterfront Car park, Merry Hill, Dudley. The footage shows the volume of spectators attending to watch the vehicles performing stunts.

Clip 3 contains footage of a street racer, driving along Kenrick Way, West Bromwich, where a traffic vehicle records its speed at approximately 100mph in a 40mph restricted road.

Clip 4 contains footage from Operation Hercules team of a Audi failing to stop for officers having been seen street racing along the Black County Route. The occupant of the vehicle is seen to throw a glass bottle at the pursuing traffic vehicle.

Clip 5 contains footage from Sandwell LA CCTV cameras located on Kenrick Way, West Bromwich, it captures spectators lining the street recording the racing on their mobile phones.

Clip 6 contains footage from social media of a collision involving street racers, where the car can be seen leaving a roundabout and nearly hitting a number of spectators. Only minor injuries were caused in this collision.

Clip7 Contains footage from the A47 in Birmingham. This footage was recorded from a marked traffic vehicle and is included as it highlights the transient nature of the street racers. The racers who

attend the Black Country are also the same racers that attend Birmingham and Solihull. It details the sheer volumes of spectators and the disruption these individuals cause.

THE ORGANISATION OF STREET CRUISES

21. The way in which events often unfold is that a group will advertise a post code and a time on one of the various social-media platforms for all those interested to attend, from there different postcode will be further posted throughout the evening. Vehicles participating in these street cruises will then see these postcodes to race and then in turn cause mass anti-social behaviour. This is very much organised crime and many amongst these groups are aware that the injunctions are no longer in place and are more willing to attend and take the chance of not being caught due to the cruising vehicles massively outnumbering the Police.

PARTICIPANTS

22. It is impossible to say how many people are actually involved in/or participate at these street cruising events as numbers tend to fluctuate rapidly. However, the average street cruising meeting can attract up to 150 to 200 vehicles per night. Bank holidays and warm weather does impact on these numbers greatly. These can swell the numbers upwards of 500 vehicles.

23. I have witnessed at Black Country Route, Kenrick Way, West Bromwich and Manor Way, Halesowen over 200 spectators standing around the various roundabouts and lining the road, encouraging the racers to go faster and perform more dangerous drifting.
24. Spectators will record the racing on their mobile phones, which is then posted onto the various social-media sites. The sheer numbers of spectators places unrealistic demands on the Police and make it a large scale public order event rather than a local policing issue. I have again on more than one occasion witnessed the large crowds of spectators turn on the Police, throwing missiles at Police cars and officers, causing damage and injury.
25. We have on average 100 to 150 spectators line the street and roundabouts, actively taking part in the racing by encouraging the behaviour. I will often see spectators standing in the road or in the middle of the roundabout to get the best filming location. My greatest fear is that during one of these street cruising meets a car will lose control, leave the carriageway and collide with the spectators, again this collision is inevitable and will only result in an extremely serious collision.
26. As I have described the spectators have very much become a part of the issue, to the point I describe the street cruising as a spectator sport. At present the powers which the police have to their disposal are limited, i.e. dispersal powers under Section 35 of the Anti-Social Behaviour, Crime and Policing Act Act 2014, obtained from an Inspector. However, the direction to exclude someone from

an area can only last a maximum of 48 hours, meaning that participating individuals can simply return again for the next street cruising event.

27. The street cruising events are becoming increasingly well organised and professional, with only a few key social media sites being used to organise the meets. The organisers will hide behind the anonymity of these social media sites, so their names do not appear and incriminate themselves.
28. However, it has become clear that the minute warrants are executed on a specific individual or social media account holder, another organiser will appear and take over where the previous organiser left. I have even heard that certain Instagram accounts are sold on to other street cruisers after their identity is discovered by Police. This tactic makes it extremely hard for the Police to keep a track on who is running the accounts.
29. The main street cruising accounts appear on Instagram, however since the arrest and series of warrants that was executed on the previously known street cruising organisers, a number of new accounts have changed tactics to evade Police and are now using closed WhatsApp and Snap chat to organise the meeting points.
30. I am aware of a number of the new accounts that have come to the forefront of organising/advertising the meets. They are as follows:

- @Forza_Birmingham, is an Instagram account and has over 24000 followers.
- @WV_racetracks, another Instagram account and has nearly 700 followers.
- @Modified_midlands, this Instagram account has nearly 9000 followers.
- @Birmz_gapperz, this Instagram account has 2500 followers.
- @section.fifty9, this Instagram account has nearly 1500 followers.
- @Tracks_birmingham, which has now become @tarcks_uk, and has over 10,000 followers. This group, however, has recently become somewhat of a pariah within the West Midlands Street cruising scene; this Instagram account was very active in organising street cruising in Black Country, but recently other @tracks_ Groups have appeared from other surrounding regions i.e. @tracks_leicester, @tracks_Nottingham, @tracks_MK (Milton Keynes) @tracks_derby.

31. When all of these groups gather it creates in some cases gatherings of over 400 vehicles. At present due to certain groups

not being liked within the West Midlands groups those groups tend to go to the other mentioned regions to race.

32. At present these groups organise racers to gather at various known locations on a weekly basis, these many groups will advertise together to attract more attendees and therefore create a much larger issue for the Police and local authority to deal with. Between just the above-mentioned organisers they have somewhere in the region of 40000 followers, this means that if even a small proportion of those were to attend a street cruise, there could easily be in the region of 500 vehicles or more present.
33. However, as I have previously mentioned, new intelligence provided by West Midlands Police does suggest that there is a movement away from the Instagram accounts towards Snapchat and WhatsApp following a policing success on a number of the organisers of street cruising events, depriving the Police their ability to disrupt these events.
34. Throughout the last 3 years where I have been the Force's lead officer in dealing with the street cruisers, I have noticed the age range of individuals dealt with for traffic offences/ section 59 warning notices varies widely, anywhere from 17-year-olds who have just passed their test all the way up to over 50 years old. The attendees are from various ethnic backgrounds, including White, Black and Asian, and there are just as many females as male attendees. This information also refers to the drivers, passengers and spectators. On-going work is still be conducted to establish and

analyse who all of the exact organisers are of these meets are in order to prosecute them.

35. Vehicles that attend can vary from the standard unmodified vehicles to heavily modified vehicles, many of the modifications are made to the vehicle to improve the basic performance of the vehicles, and these include adding hybrid turbos, air intake valves or even replacing engines. One of the main causes on the anti-social behaviour is the noise coming from the cars, many have the catalytic converters removed (de catted), have a straight exhaust pipe from the engine so the volume of noise exceeds the allowed decibel levels, or a larger bore exhaust system is added, this again creates a large volume of noise. The biggest issue is the extremely loud bangs that come from the cars, often the Police will get reports of a gun being shot, but in fact it is purely a modified car's exhaust system burning off the excess fuel.

LOCATIONS

36. This is a regional issue. There are areas across the region from Coventry to Wolverhampton and far beyond into our neighbouring Forces and local authority areas.
37. I have produced a booklet containing 7 maps of the main locations where the street racing takes place across the Black Country local authority. The main areas of concern are as follows:-
- Manor Way, Halesowen
 - Duncan Edwards Way, Dudley

- Waterfront Way, Dudley
- Tesco car park, Birmingham Road
- Kenrick Way, West Bromwich
- Tesco Car park, Willenhall
- Black Country Route

38. This is not a definitive map as the race organisers evolve on the Police attendance, they will change locations to find a new unused are. I can exhibit this booklet as **"Exhibit MRC3"**.

39. The above-mentioned locations are well known throughout the street cruisers, Police attend these events after calls from a members of the Public, the attendees will simply run to their vehicles and drive away from the area, the vehicles possibly racing will immediately drop their speed to prevent any prosecutions for various traffic offences.

40. More often than not the meets will have a number of spotters, who park a small distance away from the meeting location and will inform the organisers on the approaching Police. On hearing this, the various organisers will contact the attendees on social media groups stating "Scatter", the cruisers will then drive off awaiting a further postcode of the next location to be sent through.

41. This tactic is very hard for the Police to combat, but with the use of plain traffic vehicles the Police are able to attend the meets without being seen. Unfortunately, the use of a plain traffic vehicle cannot always be guaranteed.

OTHER REMEDIES

42. There is a wealth of Road Traffic legislation available to Officers along with powers under the Police Reform act and Anti-Social Crime and Policing act, but these rely quite heavily on the Criminal Justice System to a large extent. This means that some criminal behaviour must have taken place, and police must have caught the accused.
43. The criminal justice system does not have any protective or preventative effect in stopping the street-cruises from taking place and, for the reasons I have already explained, policing large events is so resource intensive that West Midlands Police cannot realistically attend every event in the numbers necessary to apprehend significant numbers of participants.
44. It follows from this that conventional policing and prosecution has very little if any deterrent effect. On many levels prosecuting individual drivers via the criminal justice system comes with its own problems, since the Black Country Council's Street cruising injunction has not been renewed, the only way to prosecute the cruisers/drivers is to see a moving traffic offence and prosecute for that offence, such as careless driving, speeding or simply a construction and use offence.
45. At the time of the offence the driver is spoken to, but basically is allowed to go about their business, possibly re-joining the street cruisers at the next location. Once the driver is issued with a ticket for the offence it can take anywhere upwards of six months for their

case to be heard, recently I have been in court with a careless drive that took nine months to get into Court. This is simply not providing the correct deterrent to change the mind-set of the cruiser to prevent them re-attending.

46. There needs to be an alternative method of resolution. Injunctive relief operates to prevent the conduct described above from taking place, with the effect that residents, businesses and other road users are not affected and do not have to wait for a further disruptive event before action can be taken.

47. We have also found that an injunction serves not only as a clear and immediate deterrent, but also as a means of immediate removal of the issue before an event can even begin. Enforcement of the injunction is very quickly spread through social media posts throughout the street cruising community and demonstrates a determination on the part of the Police that robust action is being taken. This not only deals with the individual at the time but sends a very important wider message.

Statements

48. **Councillor Linda Leach**, who represents the Bilston area has provided a statement in which she details the roads which are mainly effected in her constituency. She is also states that whilst the previous street cruising injunction was in place the noise anti-social behaviour dropped dramatically, but since the loss of the injunction in 2021 the complaints and concerns have risen.

49. Councillor Leach fully supports the Street cruising injunction application by the Black Country local authorities.

Julia Westwood

50. Has provided a statement in full support of the Black Country local authorities' application to obtain a new Street cruising injunction. J. Westwood has lived near to the Black Country route near Darlaston for 17 years, and has over the last few years had to put up with the issues of the car cruising scene. She states that in the summer months she can't have her windows open due to the sound of high-powered cars using the Black Country route as a race track into the early hours of the morning.

Lee Roden

51. Will state in his statement that he lives approximately 1.5 miles away from the A463 Black Country route, Darlaston in the borough of Walsall, where he has lived all of his life. Over the last two years he states he has put up with street cruisers using this section of road as a race track, which really impacts on his life due to lack of sleep and general noise pollution. He strongly supports the application to obtain a new street cruising injunction.

Mr Simon Pearson

52. Has a provided a statement in full support of the local authorities application to obtain a new street cruising injunction for the Black County area. Mr Pearson states that he worked in the Birdcall's area of Walsall, where the local road was blighted by the regular racing of high-powered vehicles performing stunts such as doughnuts. He also states that he had on numerous occasions called the Police regarding the street racing taking place.

Mrs Kelly Matthews

53. Will state that she has lost count of the amount of times she has reported the on-going issues with the racing taking place along Green Lane, Walsall. Mrs Matthews suffers from anxiety, depression and panic attacks and is struggling to deal with the noise pollution which only makes her issues worse. She wishes something could be done to stop the racing in her local area.

James MORRIS MP

54. Mr Morris MP represents Halesowen and Rowley Regis. Mr Morris has provided a detailed statement of the issues of the anti-social nature of the street racing mainly along Manor Way, Halesowen, whereby he will state that between 2015 and December 2020 he only received 5 complaints from his constituents in relation to vehicles travelling at high speed, but since December 2020 he has been contacted by 33 residents concerned about car cruising on the A456 Manor Way.

55. He has written to 1055 households on 27 different roads who are affected by the car cruising issues, urging them to sign a petition. 844 residents signed this petition, demonstrating the strength of feeling on the issue. He also details the detrimental effect the racing has on their lives.

Nicola Richards MP (for West Bromwich East).

56. Nicola Richards will state that she is in full support of the application to obtain a new street cruising injunction and writes this statement on behalf of her West Bromwich East constituents, who regularly contact her with their worries over street racing in areas such as Kenrick Way, West Bromwich.

57. This particular road suffers noisy cars, large gatherings and dangerous driving on the evening. Her constituents describe these issues as alarming and clearly organised. She also describes that since the expiration of the previous street cruising injunction the issues have worsened and could lead to a serious incident. MP Nicole Richards has received 649 signatures to a petition related to car cruising, again demonstrating the issue blighting this area.

Ronald Hill.

58. Mr Hill is providing a statement in relation to the street racing that takes place in and around the Kenrick Way area of West Bromwich. He will state that that this area has suffered over a number of years from anti-social behaviour caused by racers using this stretch of road as a racetrack, mainly on a weekend. He describes how the street racers will use the road system near to his

home as a racetrack and regularly sees large groups of spectators. He fully supports the new Street cruising application.

59. These summaries of statements are not a complete list obtained from members of the public, but all fully support the application to obtain a new Street cruising injunction.
60. Over the past 3 years of my involvement in Operation Hercules, Police have attempted to change driver behaviour using a number of different methods.
61. One such method was on 29th May 2000, whereby 85 vehicles were stopped on the A38, Sutton By-pass, near to the M6 Toll Road. These vehicles had been cruising around Coleshill, Warwickshire then Solihull before entering Birmingham and travelling along the A47 Fort Parkway and then driving along the A38. All of the drivers and passengers were engaged with and attempts were made to educate the attendees of this particular street cruise about the potential dangers associated with car cruising and actively taking part in street racing. This enforcement took 4 hours to deal with all the parties.
62. Whilst this demonstrated to other road users that action will be taken, this technique, however, has proved unsuccessful and appears to have had no effect on the number of street-cruises taking place or the number of attendees at these events.
63. Indeed, as I have said, street cruising is on the increase regionally and on a national level. The 85 vehicles stopped including their occupants are the same racers who attend Solihull,

Birmingham and then the Black Country. The racers do not see local authority boundaries and will simply move between locations where they feel safe to race.

64. Other options available to the Police to change the driver behaviour is the issuing of fixed penalty notices for offences such as Careless driving, speeding, mobile phone offences or basic construction and use, but as previously mentioned, this can take time to achieve the necessary prosecution either in court or an acceptance of the offence.
65. The combination of points on their licence and a financial penalty can on occasions deal with poor driving standards. However, just the sheer volume of participants means that the vast majority will not be prosecuted and will therefore just carry on attending the street cruising events.
66. On a few occasions Police will see some kind of dangerous driving or will be engaged in a pursuit, where the offending vehicle then fails to stop for Police. This type of offence can lead to a custodial sentence depending on the severity of the offence, but these types of incidents are few and far between, having little impact on the larger group, but potentially can prove dangerous to other innocent drivers caught up in the pursuit.
67. Public Space Protection Orders ("PSPO") under the 2014 Act may also in principle be available. However, and based on the

evidence, I feel that a PSPO would be difficult to implement and would not be likely to be an effective remedy.

68. In my limited knowledge of the PSPO orders, I do feel that the transient nature of the Street cruisers would simply mean that if a small area is covered by one of these orders the street cruisers would simply drive 5 minutes down the road to another location not covered by a PSPO order.

69. Under Section 59 of the Police Reform Act 2002, Officers have the power to stop vehicles from driving or to remove them from the road or from a private place, where they are involved in careless or inconsiderate driving and have caused anti-social behaviour. This is a useful power, but again it requires the driver to have committed the anti-social behaviour and bad driving, which is the purpose of this application to prevent, and ultimately the offending driver will get their vehicle back if seized, possibly the following day and then will be in a position to reoffend at a later date.

Injunctions against named individuals:

70. Where individuals can be identified they should be added as a party. However, the numbers attending these meets are so great that identifying all the potential defendants is simply impractical. If there are individuals who are known organisers/ringleaders it may be appropriate to name and add them as individual parties, but then, of course this will require evidence.

Impact of the Injunction

71. When the Black Country Local Authorities obtained the original Section 222 Street cruising Injunction in 2015, the effect on the street cruisers was almost instantaneous, in that, due to the possibility of arrest, the Street cruiser meets virtually stopped. I did refer to it as like a "silver bullet", and for approximately 18 months the situation did not change, to the point where the Police as a whole regarded the issue to have permanently gone away. A noticeable drop in Police call logs from members of the public drastically dropped to the point where the Police as a whole did not need to target the historical racing locations. It was felt that the introduction of the injunction was extremely successful.

72. The Organisers of street-cruising meetings in the Black Country area are well aware that the injunctions are no longer in place or enforceable, and as a result the impact has been profound. Over the last 16 months since the current Section 222 Street Cruising Injunction was not renewed, I have spoken to hundreds of drivers and passengers, who were involved in the street cruising scene.

73. The one comment I hear on a regular basis is "There's no injunction now, so there is nothing the Police can do." There is a firm belief that without the injunctions power the Police cannot stop the large scale meets. A number of the street cruisers describe what they do as being like a religion and nothing the Police will do will stop them attending apart from sending them to prison. One individual street cruiser even stated to me "The only way you will

stop me is to cut my legs off". He genuinely believed this; he has subsequently been sent to prison for disqualified driving.

74. Officers are currently heavily reliant on traffic law, but this fails to impact on those who attend to spectate, as I have said, and for the reasons I have given, it is not effective against such a large, transient and continually returning group of people. I believe that nothing short of an injunction will be effective in stopping these individuals, as it was before the cruisers came to understand that it was no longer enforceable.

75. I do believe that with the supporting injunction in place and with Operation Hercules team providing knowledge and briefings, Officers will be adequately equipped to utilise the current traffic law within a combination of specific multi agency operations to target the street cruisers.

76. West Midlands Police are increasingly working with local authorities, VOSA (vehicle and operator services agency) and specially trained PG 9 trained officers, which enables the Police to deal with a large group of street cruisers either on a car park or with a road, identifying faults or offences and prosecuting the drivers. The PG 9 officers are able to prohibit the vehicles, using these powers in combination with the injunction with have a massive ripple effect throughout the street cruising scene.

77. The injunction needs to be supported by a power of arrest. It has been demonstrated time and again that arresting offenders is a highly effective deterrent in street-cruising cases. I have witnessed first-hand the effect arresting a driver, who has breached the previous injunction, has had on the other street racers is massive. It sends a huge message to all the other drivers and spectators, to the point that on many occasions the night is finished and they go home, not wanting to be the next driver to be arrested.
78. This point is greatly increased when the arrest is advertised with the help of social media. The reverberations throughout the car scene after an arrest is posted on West Midlands Police Twitter or Facebook is incalculable. This only helps promote the Injunction and spreads the word to the public about the actions the Police and local authority are taking to deal with the issue.
79. A power of arrest as part of an injunction is important not only to prevent immediate offending from an individual or group of individuals but also to send a wider message to those persistent offenders that there is an immediate means of addressing their actions which carries robust consequences.
80. I also believe that a civil remedy of this kind has the added benefit of preventing some participants from entering into the criminal justice system with all the negative consequences that that has for their future prospects, and will without doubt also save the lives of others.

PERSONS UNKNOWN

81. Certainly, for the last 18 months or so, there have been very few arrests involving street racers. This is, partially due to a lack of Police numbers and Criminal Evidence Act 1984, in that a driver will only be arrested for the very serious offences such as dangerous driving or failing to stop for Police, where a pursuit has taken place. These offences are rarely seen due to the nature of road layouts and street racing participants seeing the Police early and warning other participants.
82. On any given night Operation Hercules team may only have two officers on duty, it is unfortunately part of Policing that when an offender is arrested that particular Police crew will then be off the streets for at least 4 hours, this fact causes the issue of allowing the street cruisers to carry on potentially driving in a dangerous manner, causing anti-social behaviour.
83. The Police did see a substantial decrease in numbers of calls to the Police during the COVID lockdown, there are many contributing factors to this, but after a couple of months of lockdown the street cruisers did start to meet up within the West Midlands, however the numbers remained low due to COVID fines being handed out, which was many and the formulation of the Operation Hercules team. This team was specifically put together to target the street cruisers.
84. The team became very aware of the locations the gathering were taking place and even though they were not able to stop street racing within the street cruisers, the length of time the cruisers were

at any one location was kept to a minimum, hence why the number of calls to service has remained relatively low.

85. I have produced the below data covering the calls made from members of the public to the Police regarding street racing across the 4 Black Country local authority areas.

Operation Hercules

Street racing calls to service between April 2020 and March 2022.

		DY	SW	WS	WV	Total
2020	Apr	31	52	41	22	146
	May	42	117	40	23	222
	Jun	58	158	35	24	275
	Jul	35	96	37	45	213
	Aug	46	112	29	46	233
	Sep	38	52	30	26	146
	Oct	55	66	25	54	200
	Nov	56	51	11	18	136
	Dec	111	65	34	20	230
2021	Jan	36	46	26	14	122
	Feb	90	138	13	21	262
	Mar	97	97	40	36	270
	Apr	67	143	32	41	283
	May	35	73	23	26	157
	Jun	38	74	25	57	194
	Jul	35	57	29	25	146
	Aug	37	46	20	12	115
	Sep	24	35	15	26	100
	Oct	11	47	14	34	106
	Nov	19	34	14	33	100
	Dec	13	45	18	16	92
2022	Jan	11	62	18	27	118
	Feb	9	53	15	15	92
	Mar	23	50	24	25	122

Key.

DY= Dudley local authority
 SW= Sandwell local authority
 WS= Walsall local authority
 WV= Wolverhampton local authority

86. From April 2020 to March 2022 there have been 3874 calls to service. A noticeable spike can also be seen in numbers of recorded incidents of street racing after February 2021. February

2021 was the month the Black Country lost its Section 222 Street cruising injunction.

87. The calls jumped from 122 in January to 262 in February then 270 in March and then 270 in March. I was aware of organisers hearing about the loss of the injunction and made the declaration to all of their followers that the Black Country was the area to race in.
88. This number of calls to the Police is averaging just under 170 calls per month, however this does not include the areas of Solihull and Birmingham. The cost to Police to attend these logs and to deal with any of the issues has a massive impact in the ability of the Police to deal with other potentially more serious offences.
89. The Policing from the Operation Hercules team has been very robust and has definitely displaced some of the Street cruisers to other locations such as Birmingham and Solihull and even further afield, such as Milton Keynes, Leicester, Derby and Staffordshire.
90. There is no doubt in my mind that the bad days of previous years will definitely return without this style of Policing being present and can only improve with the reintroduction of a new Injunction and the extra powers it provides.
91. The Operation Hercules team has dealt with a large number of potential street-cruisers by reporting them for various driving offences. On an average month Operation Hercules team consisting of two officers, will report approximately 150 drivers for a variety of offences including careless driving, Excess speed, No

insurance or construction and use offences. This has increased vastly on previous years due to the dedicated team looking at this specific problem.

92. As per my previous comments the time it is taking to get these individuals through the Criminal Court system having an adverse effect and is simply allowing this anti-social behaviour to persist for months awaiting a court date.

93. We have also issued in excess of 500 of drivers with Section. 59, 2002 Act, warnings to drivers for using their vehicles in an anti-social manner, this warning lasts for 12 months, but has not prevented the same vehicles returning to take part in the street cruising. It simply makes the driver more aware of the potential of the Police to seize their vehicle if they commit a careless or inconsiderate offence, coupled with any Anti-social behaviour.

94. The street cruising organisers are well aware of the Section 59 powers and are even advising anyone receiving the warning of their rights and that the Police have to return the said seized vehicle the following day, this has empowered the cruisers to not be as fearful of this power as they will only be deprived of the vehicle for 24 hours. However, due to the large number of participants, the changing nature of the group and the small proportion of arrests made, it is impossible to identify all or most of the persons involved in street-cruising.

95. Even though hundreds of section 59 Warnings have been issued, and numerous individuals have been prosecuted through

Traffic Process, if Officers had the knowledge and support of an Injunction many of the individuals dealt with would have been arrested, the importance of the power of arrest cannot be underestimated, one reason being it immediately removes the danger from the road and means on that occasion the driver cannot commit any further offences or even worse be involved in a serious collision, but the arrest is seen by the larger group of street cruisers and they are left in no uncertain terms that if they continue to drive or behave in this manner they too may have their liberty taken.

96. Due to the overwhelming reliance on Social Media that these groups have, and also the outreach that West Midlands Police Facebook and Twitter has, these high profile arrests would make a real difference in the cruisers willingness to attend such events.

POWER OF ARREST

97. As mentioned earlier and evidenced by the accident in Hertfordshire (**"Exhibit MRC1"**), the unlawful behaviour in which street-cruisers engage puts themselves, spectators, Police and members of the public caught in the middle of such meetings at a significant risk of harm.

98. I have personally witnessed traffic officers being assaulted and having their traffic car damaged, where a missile was thrown through the rear window and the officer had a stone thrown at him, hitting him on the head, this took place in the Birmingham area. This was all due to the Police stopping a street cruiser in an area where over 300 spectators had formed to watch the driving.

KNOWLEDGE OF THE LAST INJUNCTION

99. Signs, detailing the previous Section 222 High Court Street cruising injunction were placed at the below locations, many of which are street-cruising hotspots, however some of the signage was of the foam design and not a permanent fixture.

Dudley signage.

Metal Signage

1. A4123 New Birmingham Road @ Sedgley Rd
2. A451 Birmingham Road @ Castlegate.
3. A461 Dudley Sothern By pass @ Castlegate.
4. A461 Dudley Sothern Bu pass @ Cinder Bank
5. A456 Manor Way on approach to Hayley Green Island.

Foam board signs

1. Flood Street Car park @ Duncan Edwards Way
2. Stafford Street Car park
3. Tesco Car park @ A461 Birmingham Road

Sandwell signage

Wednesbury

1. Retail park, Axletree Way @ Junc 9, M6 (Metal sign)
2. Axletree Way Island. Lamppost 12 (Foam sign)
3. Axletree Way retail park, lamppost 1, (Foam sign)
4. Axletree Way Island, lamppost 34, (Foam sign)
5. Moorcroft Crive @ Hallens Drive. Lamppost 1. (Foam sign)
6. Hallens Drive, Lamppost 18. (Foam sign)
7. Hallens Drive, lamppost 19. (Foam sign)
8. A41 Black Country Route (Metal Sign)

Tipton

1. A461 Island Great Bridge, Lamppost R3/5
2. Brickhouse Lane South, lamppost 7 (foam sign)
3. Entrance to Adsa retail off Great Bridge Street. (foam sign)
4. Dudley port junction@ Sedgley Road East. Lamppost 34. (foam sign)

West Bromwich

1. Green Street@ Kenrick Way, Lamppost 12. (Foam sign)
2. Kenrick Way towards West Bromwich, Lamppost 55 (Foam sign)
3. Kenrick Way, away from West Bromwich. (Foam sign)

4. Blacklake @ New Swan Lane (Foam Sign)

Oldbury

1. Toys R us car park (Foam sign)
2. Toys R us car park (Foam sign)
3. Toys R us car park exit @ Wolverhampton Road. Lamppost 207 (Foam sign)
4. Birchley Island @Junction 2 M5 (Metal sign)

Walsall

1. Black County New Road@ Dangerfield Lane
2. Lichfield Road @Coppice Farm Way
3. Essinngton Road @ Kewstoke Close.
4. West Bromwich Road @ Greenside Way.
5. Bescot Road @ Fellows Park Gardens
6. Chester Road @ Lichfield Road
7. Chester Road @ Little Aston Road.

Wolverhampton

1. Springvale Way on the following lamppost. 4,22,25,2 and 3.
2. Black Country Route (Small signs) on the following lamppost. 33,28,11,12,3,22,32,41,74.
3. Black Country Route (Large signs) on the following lamppost 16,83,152,174,201,162,138 and 64.

100. Below is an example of one of the signs placed on many of the arterial routes within the 4 local Black Country authorities.



101. Additionally, the injunction was widely publicised across a variety of news channels when it came in force both locally and nationally. It would be virtually impossible for street-cruisers not to be aware of the last injunction. In fact, when stopped, many often commented on such signs, informing the Police that they are aware of the injunctions signs as they say: "You can't miss them", but I personally have been told on more than one occasion that they believed the Section 222 Injunction had stopped.

102. The importance of the signage and a large-scale media report cannot be underestimated. I am aware on more than one occasion that when a street cruiser has been arrested, they will state that "They didn't know about the injunction" even though it had been widely publicised, and they had driven past the signage on more than one occasion that evening.

ENGAGING WITH OTHER LOCAL AUTHORITIES

103. Engagement is at the heart of my work ethos, I try to encourage and expect this from my team and as with many Police initiatives, partnership work is essential. Due to my knowledge within the field of Street cruising and street racing I have work with various Police forces and local authorities throughout the Country. Only recently I am working in partnership with the Metropolitan Police Force and Newham London Borough Council in relation to their ever-increasing issue with illegal street racing and street cruising.

104. I am in the process of advising the local authority as to the advantages of a Street cruising injunction and various other tactical options the Police can invoke. I have also been working along Hertfordshire Police, namely Stevenage Police for the same reason. I have also been working closely with Solihull local authority, in renewing their injunctions and more recently try to obtain a further Injunction for Birmingham.

105. Operation Hercules has been a West Midlands initiative based around the Street Cruising section 222 injunction. In the last 18 months a team of 4 officers has been created to purely provide a tactical response to the ever-increasing issue of illegal street racing and street cruising.

106. The Hercules team has become very proficient at attending and dealing quickly to the street cruisers, so much so that we have pushed large volumes of the cruisers to our neighbouring Police forces. I am therefore working alongside these forces on a regional

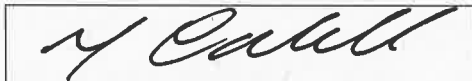
basis to advise and provide support to enable them to deal with illegal street racing.

107. The tactical side of Operation Hercules is very much a first of its kind and it is hoped that its success with the support of positive intervention of the courts that a precedent of positive action can be taken.

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

15.7.2022

Print name in full

MARK CAMPBELL

i) Statement of: PC Mark Campbell
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 13 July 2022
v) Exhibits: MRC1-MRC3

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT MRC1

This is the document referred to as "Exhibit MRC1" in the witness statement of Mark Campbell dated 13 July 2022.

This is in fact video footage which is available separately.

i) Statement of: PC Mark Campbell
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 13 July 2022
v) Exhibits: MRC1-MRC3

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(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT MRC2

This is the document referred to as "Exhibit MRC2" in the witness statement of Mark Campbell dated 13 July 2022.

This is in fact video footage which is available separately.

i) Statement of: PC Mark Campbell
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 13 July 2022
v) Exhibits: MRC1-MRC3

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

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Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT MRC3

This is the document referred to as "Exhibit MRC3" in the witness statement of Mark Campbell dated 13 July 2022.

Black Country Local Authority injunction application.



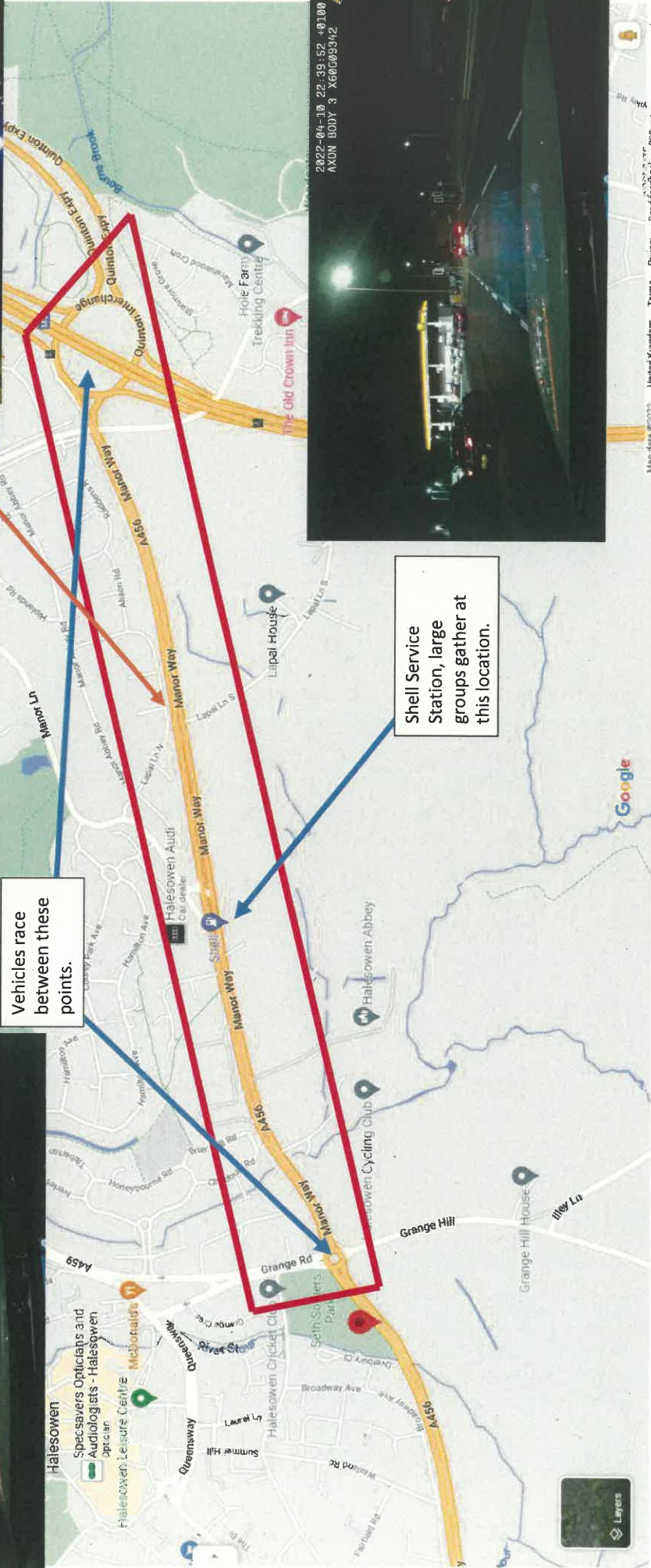
Exhibit ref no MRC/3

Booklet containing 7 maps.



Vehicles race between these points.

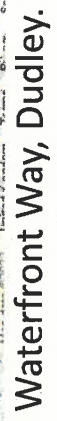
Shell Service Station, large groups gather at this location.

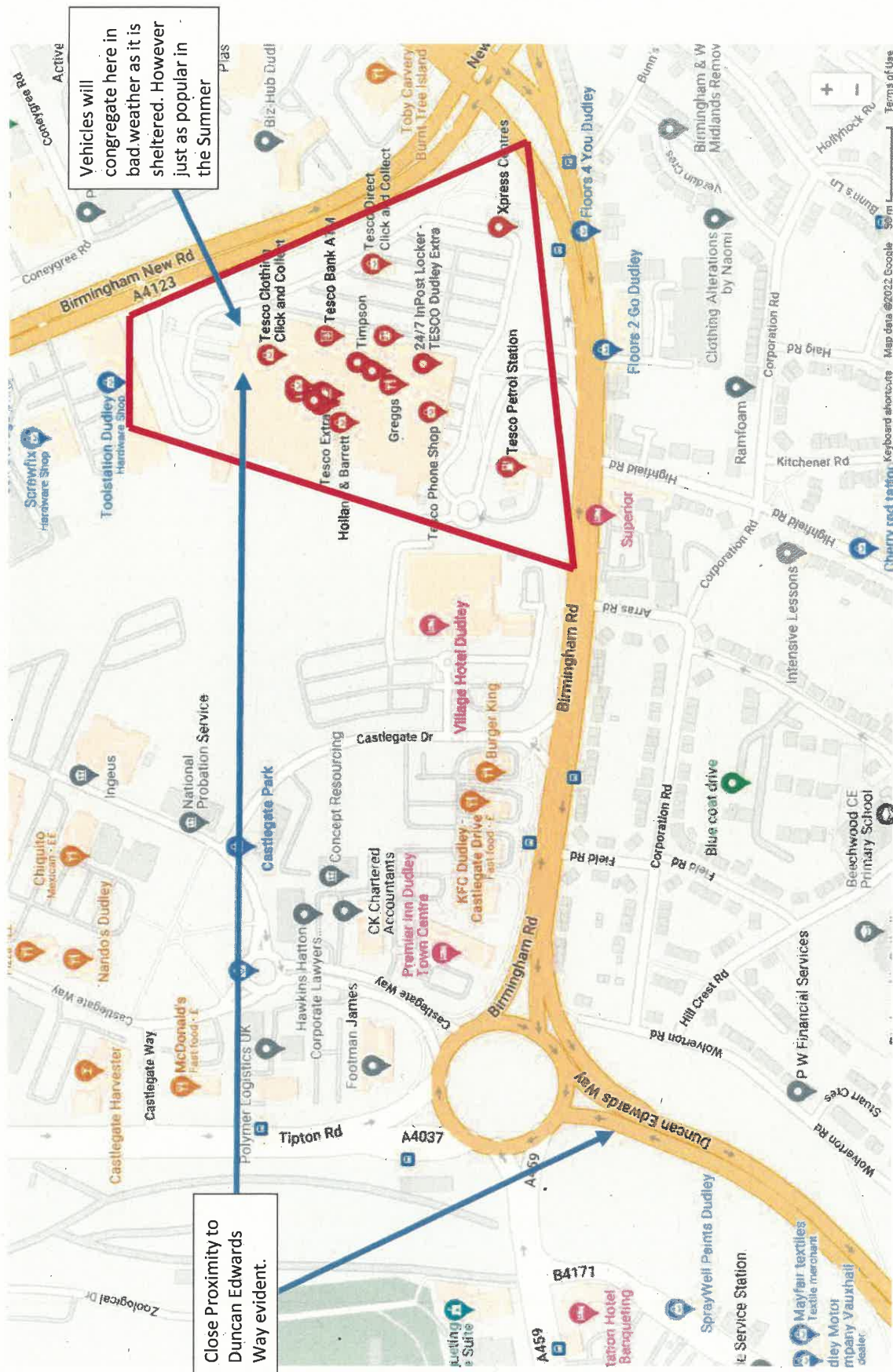


Manor Way, Halesowen.

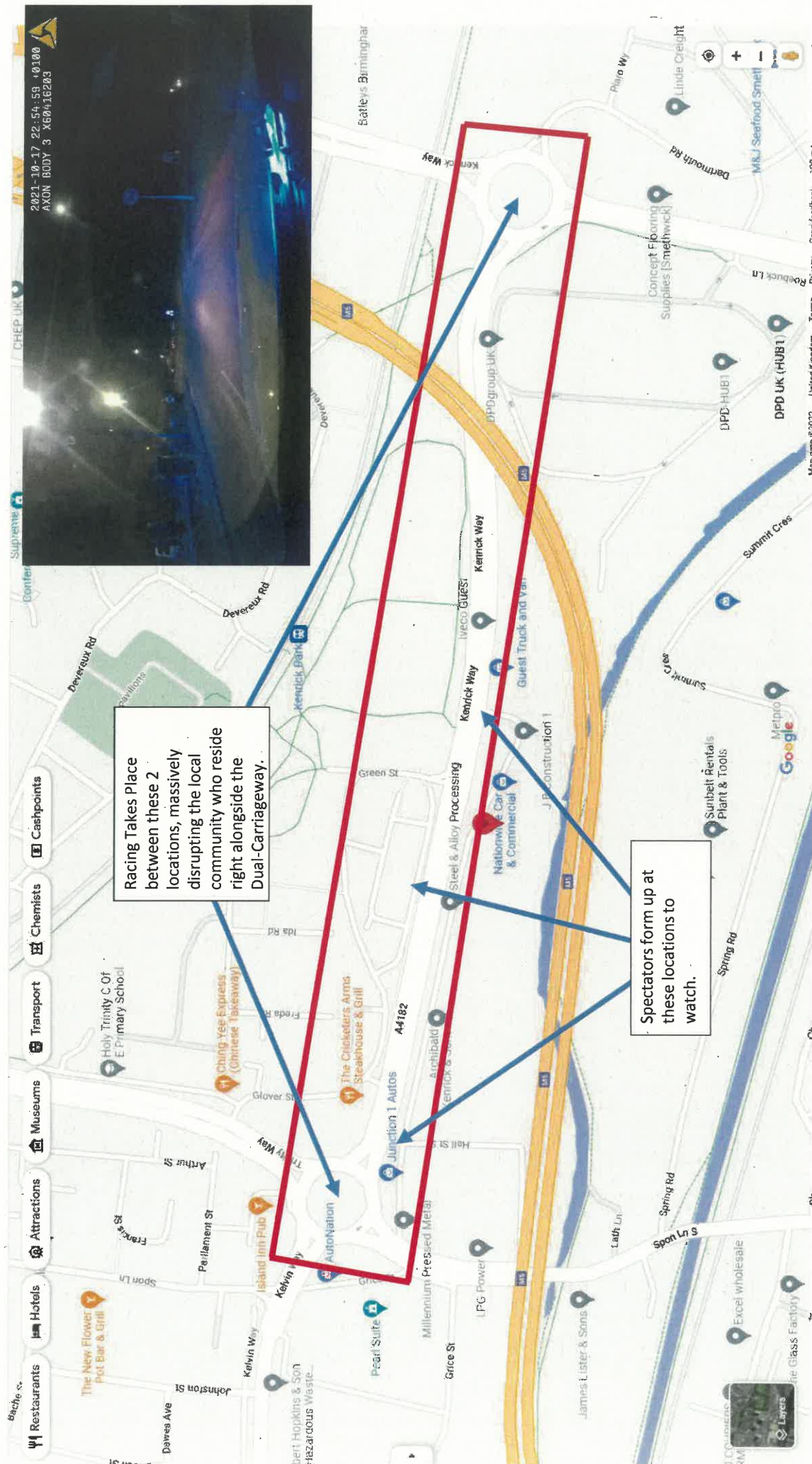


Duncan Edwards Way, Dudley.

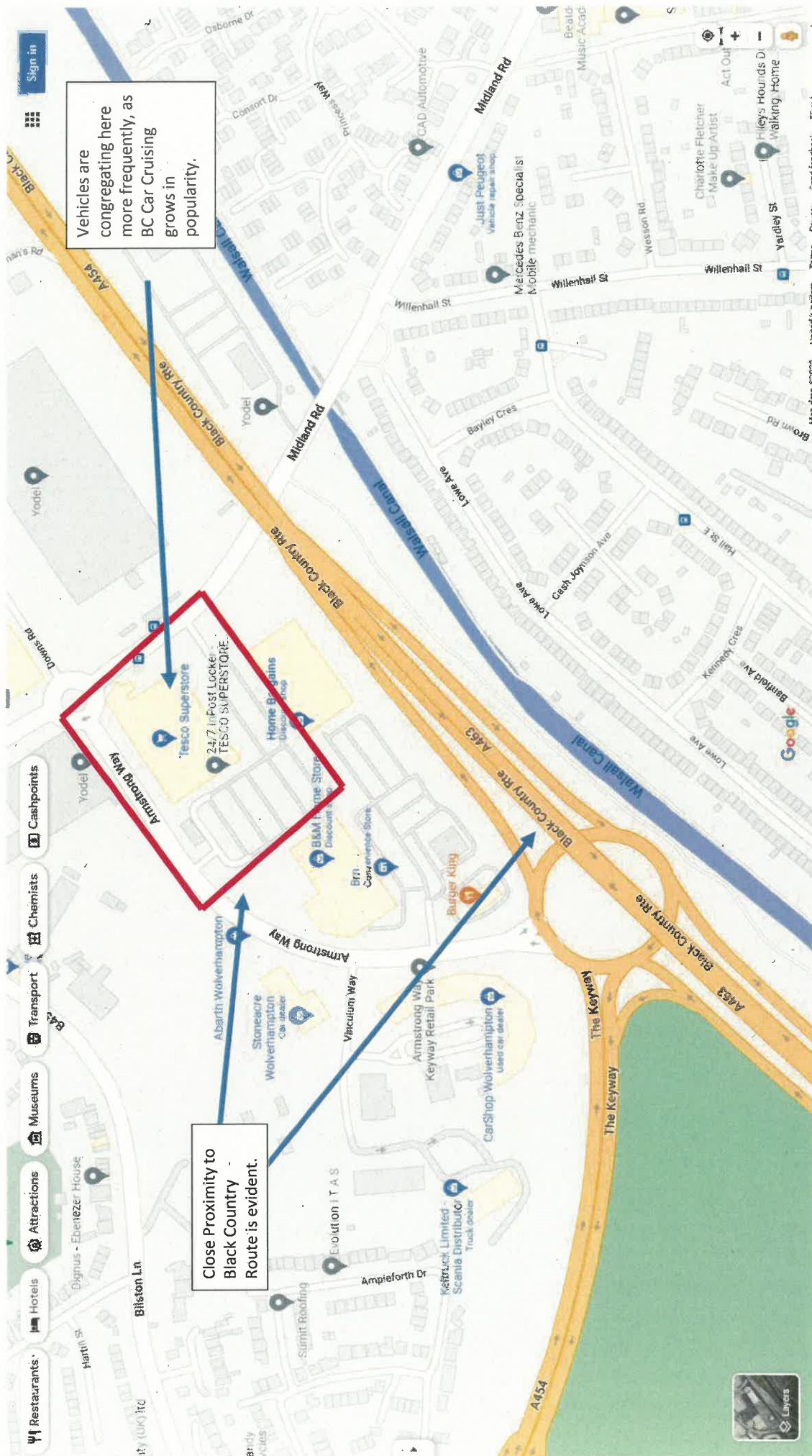




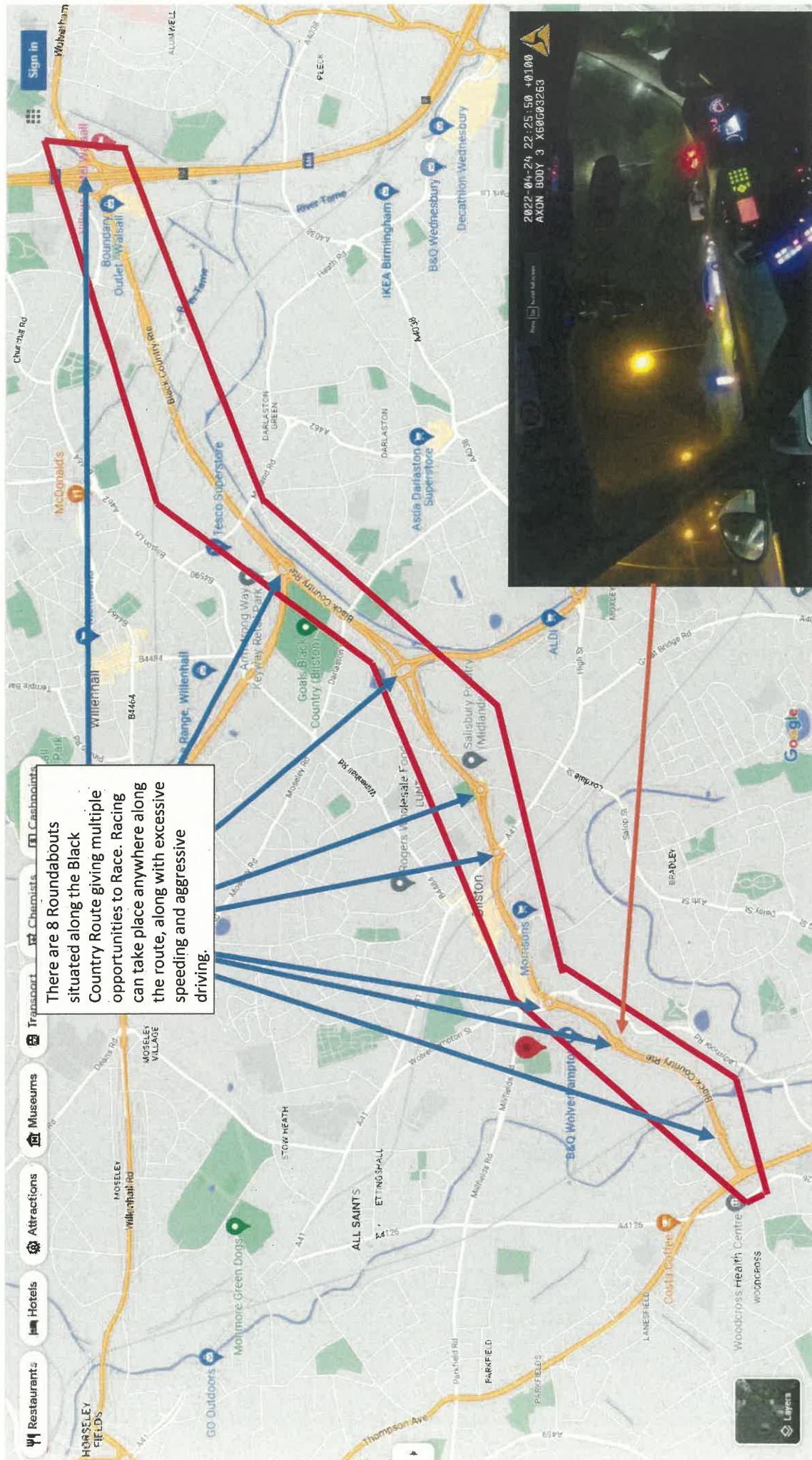
TESCO, Birmingham Road.



Kenrick Way, West Bromwich



TESCO, Willenhall.



Black Country Route.

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

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF PAUL STEVEN BROWN

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

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

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

STATEMENT OF TRUTH

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

Full Name: PAUL STEVEN BROWN Position: COMMUNICATIONS
MANAGER

Name of Claimant: City of Wolverhampton Council

Signed



Print Name **PAUL STEVEN BROWN**

Dated **16/9/2022**

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

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT PB1

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

Street Racing Injunction Communications Plan

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

PROTECT

	<p>Country among people intending to organise, take part in or spectate at a planned gathering.</p> <ol style="list-style-type: none"> 2. Upon granting of the injunction, raise awareness of existence and application of the injunction preventing street racing activities anywhere in the Black Country among people intending to organise, take part in or spectate at a planned gathering. 3. Enable the injunction to be served to “persons unknown” by ensuring authorities have done all they can to make people aware of its existence. 4. Reassure residents and businesses that measures are in place to prevent street racing throughout the Black Country. 5. Improve engagement between partner agencies on the issue of street racing. 6. Signpost residents and businesses to the mechanisms available in which to report instances of street racing. 7. Help bring about a reduction in instances of street racing in the Black Country.
Strategy	<ol style="list-style-type: none"> 1. Develop, with partner authorities across the Black Country including Dudley Council, Sandwell Council, Walsall Council and West Midlands Police, a planned and sustained communications campaign which maximises opportunities and manages risks. 2. Using a variety of traditional and social media, raise awareness of the existence of the injunction, and its ramifications for people intending to take part in or spectate at a street racing meeting. 3. Development of a range of materials to highlight injunction and power of arrest. 4. Improve relationship between partners through proactive stakeholder engagement. <p>Key stakeholders – internal: Council officers – legal, enforcement, Anti-Social Behaviour unit, highways, Cabinet lead, wider Cabinet, local ward councillors, wider council employees.</p> <p>Key stakeholders – partners: City of Wolverhampton Council, Dudley Council, Sandwell Council, Walsall Council, West Midlands Police, Highways Agency.</p> <p>Key stakeholders – external: Street race organisers, participants and spectators, local residents, local schools, local businesses, taxpayers, media (Express & Star, Wolverhampton Chronicle, Birmingham Mail, BBC WM, WCR FM, Signal 107, Free Radio, BBC Midlands Today, ITV Central), social media (Twitter, Facebook and Instagram), local MPs.</p>

Implement- tation

1) Corporate spokespeople:

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

2) Key messages:

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

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

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

3) Action Plan

- See Action Plan, below – note, this is in two parts, the first relating to the steps that will be taken to publicise the application for an injunction to the High Court, the second the steps that will be taken to publicise the existence and application of the injunction once granted and then implemented.
- To be reviewed after six months.

4) Budget

- Has been identified.

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Evaluation

1. Number of positive stories about street racing injunction both prior to and post implementation in local media – target of at least eight across range of media.
2. Social media reach and engagement levels on postings relating to street racing (comments, likes, shares)
3. Reports of instances of street racing from individuals and businesses
4. Plan delivered on timescale and to budget.

ACTION PLAN

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

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

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	the case to ensure communications are inclusive and cater for those with literacy difficulties. To be published on claimants' websites and shared widely on social media.	receipt of the sealed order from the court.		
13	Media release shortly before court hearing, reminding people that an application for a new injunction will shortly be heard by the High Court, detailing the date of the hearing and the court's address. Please see indicative draft, exhibit Appendix 9, which will be amended as required prior to publication. Please also see note 1) below, detailing proposed distribution of the media release.	One week prior to hearing	PB	
14	Social media linking to above media release announcing imminent court hearing application to High Court for a new street racing injunction, detailing the date of the hearing and the court's address. Please see indicative drafts, Appendix 10, which will be amended as required prior to publication.	Within one working day of the above	All	
INTRODUCTION OF STREET RACING INJUNCTION				
Step	Action		Who	Completed
1	Media release highlighting granting of the High Court injunction and power of arrest and next steps for its introduction. Please see indicative draft, Appendix 11, which will be amended as required prior to publication. Please also see note 1) below, detailing proposed distribution of the media release.	To be issued by 4pm on the next working day after the date of the grant of any injunction	PB	
2	Social media linking to the above media release regarding the granting of the High Court injunction and power of arrest and next steps for its introduction highlighting introduction of injunction and power of arrest. Please see indicative drafts, Appendix 12, which will be amended as required prior to publication.	Within 1 working day of the above	All	
3	Update dedicated pages on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council, Walsall Council and West Midlands Police about injunction and power of arrest, and date of introduction of the injunction.	Within three months of the date of the grant of any injunction	All	
4	Review and refresh of existing signage publicising the injunction and installation of new signage as necessary: Dudley's existing signs and proposed signs – see Appendix Signage 1 and 2; Sandwell's existing signs and proposed signs – see Appendix Signage 3 and 4; Walsall's existing signs and proposed signs – see Appendix Signage 5 and 6; Wolverhampton's existing signs and proposed signs – see Appendix Signage 7 and 8.	Within three months of the date of the grant of any injunction	CWC legal	
5	Production of A5 flyer detailing injunction and power of arrest. Please see indicative draft, Appendix 13, which will be amended as required prior to publication.	Within three months of the date of the grant of any injunction	PB	
6	File statement to court to confirm that the above steps have been completed. Note,	Within three months of the date	PB	

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

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18	Review of communications plan and refresh	Six months after introduction of injunction	PB	

Notes:

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

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX ONE

Councils and police seek new ban on street racing in region

Released: Monday 4 July, 2022



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

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

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

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

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

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

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

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

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

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

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

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

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

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

ENDS

Notes to editors:

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

- **Issued by the City of Wolverhampton Council's Corporate Communications Team.**
- **For more information, please call 01902 555439.**
- **More news from the City of Wolverhampton Council is available at:**
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**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX TWO



Wolverhampton Today
Published by Orlo · 4 July · 🌐

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

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

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

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Wolves Council [@WolvesCouncil](#) ·

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



12:47 PM · Jul 4, 2022 · Orlo

Sandwell Council [@sandwellcouncil](#) · Jul 4

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

Wolves Council [@WolvesCouncil](#) · Jul 4

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



🗨️ 1 ➦ 7 ❤️ 15 📧

Sandwell [@sandwellcouncil](#) · 4 July · 🌐

We're joining forces with Wolverhampton, Dudley and Walsall councils and West Midlands Police to apply for a new High Court injunction to ban "street racing" in the Black Country 📢



Wolverhampton Today
4 July · 🌐

Wolverhampton, Dudley, Sandwell and Walsall councils and West Midlands Police have announced they will be applying for a new High Court injunction to ban "street racing" in the Black Country. Full story: [See more](#)

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Our Walsall [@ourwalsall](#) · 4 July · 🌐

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



Wolverhampton Today
4 July · 🌐

Wolverhampton, Dudley, Sandwell and Walsall councils and West Midlands Police have announced they will be applying for a new High Court injunction to ban "street racing" in the Black Country. Full story: [See more](#)

👍 10

Walsall Council [@WalsallCouncil](#) · Jul 4

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

Wolves Council [@WolvesCouncil](#) · Jul 4

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



🗨️ ➦ 📧 242

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX THREE

Street racing reports filed as councils build case for new injunction

Released: Monday 25 July, 2022



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

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

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

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

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

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

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

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

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

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

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

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

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

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

ENDS

Notes to editors:

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

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IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX FOUR



Sandwell
8 August at 12:39 · 🌐



Wolverhampton Today
25 July · 🌐

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

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

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

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

Since announcing the news, authorities have... [See more](#)

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Our Walsall
25 August at 14:39 · 🌐



Wolverhampton Today
25 August at 13:01 · 🌐

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

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@WolvesCouncil

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



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Dudley borough
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25 July · 🌐

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

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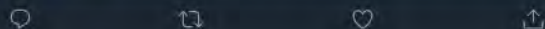


Dudley Council @dudleymbc · Aug 3
We're working with our fellow Black Country authorities to apply for a new injunction to prohibit **street racing**

Wolves Council @WolvesCouncil · Jul 25

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

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IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX FIVE

Councils and police in application for new street racing ban

Released: Thursday 25 August, 2022



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

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

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

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

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

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

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

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

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

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

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

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

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

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

ENDS

Notes to editors:

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

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

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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(4) WALSALL METROPOLITAN BOROUGH COUNCIL

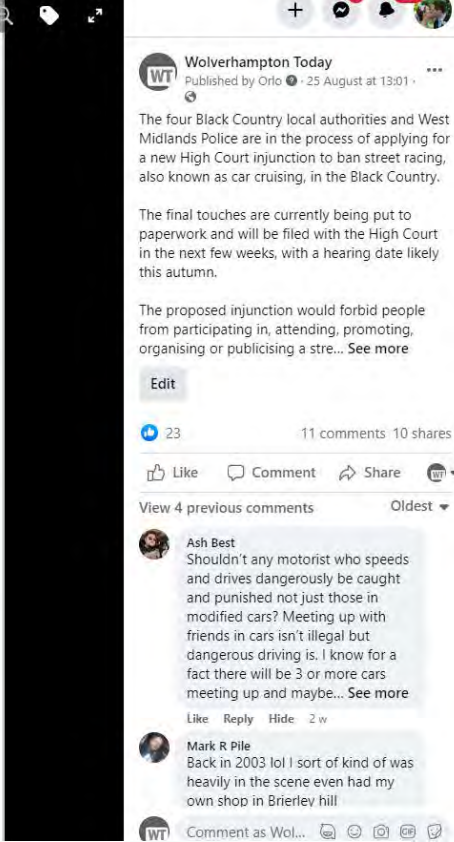
Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX SIX



Walsall Council Retweeted
Wolves Council @WolvesCouncil · Aug 25
We, @dudleymbc, @sandwellcouncil, @WalsallCouncil & @WMPolice are in the process of applying for a new High Court injunction to ban street racing, also known as car cruising, in the Black Country. Full story: orlo.uk/Kk5Wu #streetracing #carcruising #injunction



Dudley Council Retweeted
Wolves Council @WolvesCouncil · Aug 25
We, @dudleymbc, @sandwellcouncil, @WalsallCouncil & @WMPolice are in the process of applying for a new High Court injunction to ban street racing, also known as car cruising, in the Black Country. Full story: orlo.uk/Kk5Wu #streetracing #carcruising #injunction



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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX SEVEN

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

Released: TBC



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

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

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

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

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

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

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

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

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

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

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

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

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

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

ENDS

Notes to editors:

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

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DRAFT

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX EIGHT



Social media to accompany media release announcing High Court hearing date

TWITTER

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

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

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

FACEBOOK

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

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

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

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

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

INSTAGRAM

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

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

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

DRAFT

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX NINE

Councils and police seek street racing an in court next week

Released: TBC



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

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

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

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

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

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

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

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

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

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

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

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

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

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

ENDS

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DRAFT

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

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(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX TEN



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

TWITTER

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

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

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

FACEBOOK

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

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

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

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

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

INSTAGRAM

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

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

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

DRAFT

IN THE HIGH COURT OF JUSTICE
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CLAIM NO:

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(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX ELEVEN

Street racing banned in Black Country by High Court

Released: TBC



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

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

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

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

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

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

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

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

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

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

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

QUOTE FROM WEST MIDLANDS POLICE

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

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

ENDS

Notes to editors:

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

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IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX TWELVE



Social media to accompany media release upon granting of injunction

Twitter

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

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

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

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

FACEBOOK

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

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

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

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

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

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

INSTAGRAM

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

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

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

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX THIRTEEN



STREET RACING BANNED IN THE BLACK COUNTRY

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

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



Walsall Council

**CITY OF
WOLVERHAMPTON
COUNCIL**

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

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

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

INJUNCTION - *The injunction states:*

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

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

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

Stunts are driving manoeuvres often undertaken at such gatherings including:

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

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

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

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX FOURTEEN

Street racing ban comes into force in Black Country

Released: TBC



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

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

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

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

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

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

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

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

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

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

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

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

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

ENDS

Notes to editors:

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

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

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX FIFTEEN



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

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

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

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

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

FACEBOOK

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

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

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

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

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

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

INSTAGRAM

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

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

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

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX – “DIGITAL SIGNAGE”

Digital signage information for Wolverhampton and Walsall, please see below.

A note regarding signs highlighted blue. These are not currently able to display picture messages but are able to display free text messages.

Wolverhampton Car Park Guidance and Traffic Information	CPG01	Waterloo Road - Inbound / Nr Whitmore Hill - Wolverhampton	VMS - Freetext RGB
	CPG02	Ring Road St Peters / From Stafford St to Waterloo Rd - Wolverhampton	VMS - Freetext RGB
	CPG03	Ring Rd St Andrews / From Waterloo Rd to Chapel Ash - Wolverhampton	VMS - Freetext RGB
	CPG04	Chapel Ash Inbound / Nr to Chapel Ash Island - Wolverhampton	VMS - Freetext RGB
	CPG05	Ring Rd St Marks / From Penn Island to Chapel Ash - Wolverhampton	VMS - Freetext RGB
	CPG06	Ring Rd St Andrews / Nr to Bath Road - Wolverhampton	VMS - Freetext RGB
	CPG07	Ring Road St Johns / Penn Road Island - Wolverhampton	VMS - Freetext RGB
	CPG08	Stafford Road Inbound / Between Cannock Rd and Ring Rd - Wolverhampton	VMS - Freetext RGB
	CPG09	Penn Road Inbound / Nr Mercedes Benz - Wolverhampton	VMS - Freetext RGB
	CPG10	Dudley Rd I/B Nr Bell Place	VMS - Freetext RGB
	CPG11	Ring Rd / St Georges	VMS - Freetext RGB
	CPG12	Ring Rd / St Marks	VMS - Freetext RGB
	CPG13	Ring Rd - St Johns to Snowhill Jct	VMS - Freetext RGB
	CPG14	Ring Rd - St Patricks to Stafford St Jct	VMS - Freetext RGB

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

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

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

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

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

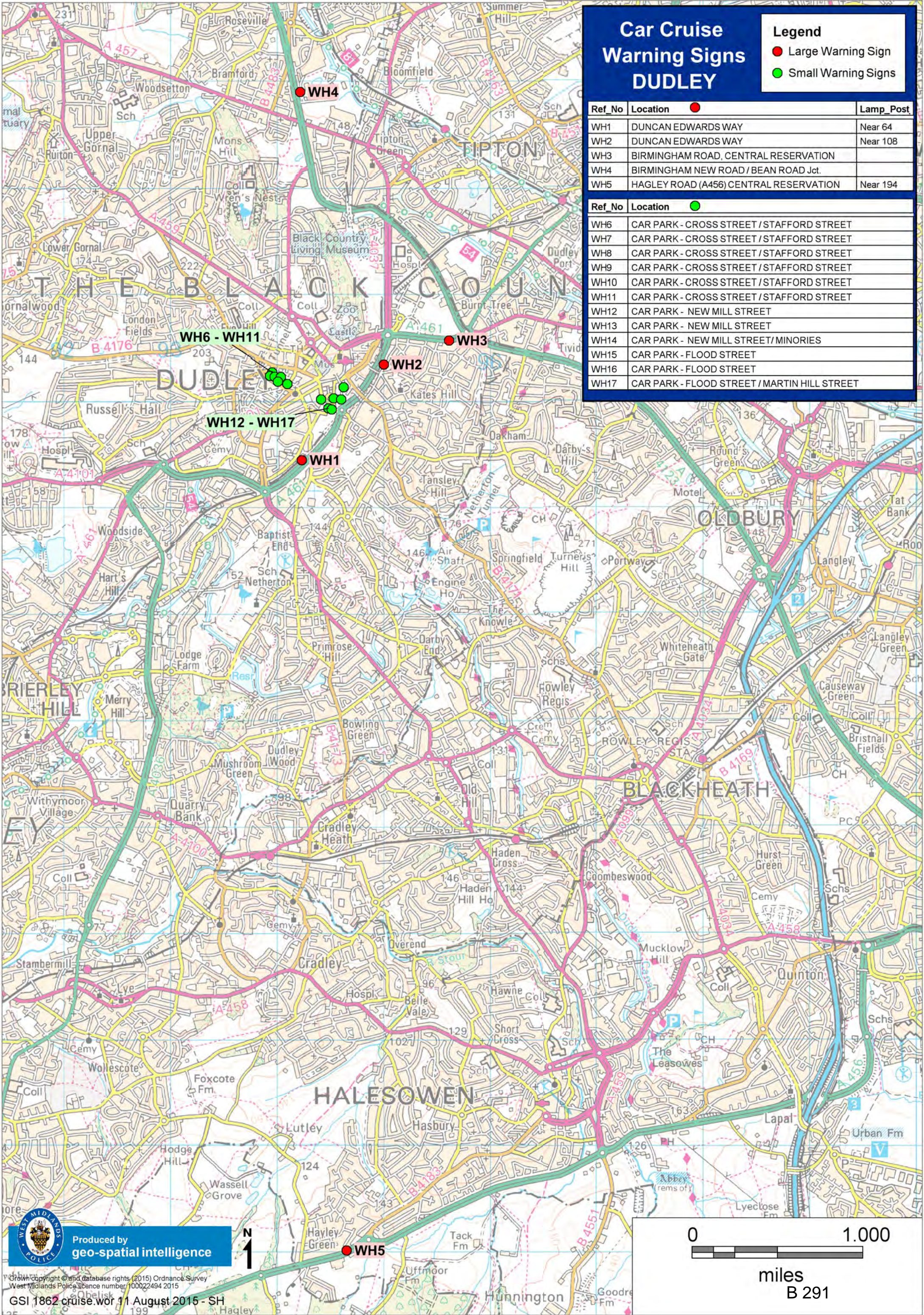
Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN – APPENDIX: “SIGNAGE ONE”



IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN – APPENDIX: “SIGNAGE TWO”

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

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

EXISTING SIGNAGE (INSTALLED BETWEEN JANUARY 2015 and JANUARY 2021)

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

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

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

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

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

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

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN – APPENDIX: “SIGNAGE THREE”

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

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

CLAIM NO: A90BM228

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

WITNESS STATEMENT OF PC SIMON ACKROYD

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

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

STATEMENT OF TRUTH

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

Full Name: PC Simon Ackroyd

Name of Claimant: Sandwell Metropolitan Borough Council

Signed 

Print Name Simon Ackroyd

Dated 03/01/19

CAR CRUISING LARGE AND FOAMEX WARNING SIGN LOCATIONS

SANDWELL MBC

DATE SIGN CHECK COMPLETED: 21/11/2018

S. Dyer

WEDNESBURY

- ✓ 1. RETAIL PARK ENTRANCE OF AXLETREE WAY (JUNC 9 TOWARDS WEDNESBURY)
LARGE SIGN. IN ORDER ~~Y/N~~.

REPLACED
21/11/18

- ✓ 2. AXLETREE WAY ISLAND (IKEA SIDE). LAMPOST 12 FOAMEX SIGN. IN ORDER Y/N. BROKE IN HALF
DROPPED DOWN

- ✓ 3. AXLETREE WAY JUNCTION NEAR TO CURRYS. LAMPOST 1. FOAMEX SIGN. IN ORDER
~~Y/N~~.

- ✓ 4. AXLETREE WAY ISLAND (PC WORLD/CURRYS/BURGER KING) LAMPOST 34.
FOAMEX SIGN. IN ORDER ~~Y/N~~.

- ✓ 5. MOORCROFT DRIVE (JUNCTION OF HALLENS DRIVE) LAMPOST 1. FOAMEX SIGN. IN
ORDER ~~Y/N~~.

- ✓ 6. HALLENS DRIVE (ISLAND JUNCTION OF PATENT DRIVE). LAMPOST 13 FOAMEX
SIGN. IN ORDER ~~Y/N~~.

- ✓ 7. HALLENS DRIVE (ISLAND JUNCTION NEAREST CANAL NEAR JOHNSON CONTROLS
END). LAMPOST 19 FOAMEX SIGN. IN ORDER ~~Y/N~~.

- ✓ 8. A41 (BLACKCOUNTRY ROUTE NEAR TO DREAMS) LARGE SIGN. IN ORDER ~~Y/N~~.

TIPTON

- ✓ 9. A41 ISLAND GREAT BRIDGE (BY OLYMPUS). LAMPOST R 3/5. IN ORDER ~~Y/N~~.

- ✓ 10. BRICKHOUSE LANE SOUTH (BY PETROL STATION) LAMPOST 7. FOAMEX SIGN. IN
ORDER ~~Y/N~~.

- ✓ 11. ENTRANCE TO MCDONALDS CARPARK AREA. NO LAMPOST NUMBER. FOAMEX
SIGN. IN ORDER ~~Y/N~~.

- ✓ 12. ENTRANCE TO ASDA RETAIL OFF GREAT BRIDGE STREET. FOAMEX SIGN. IN ORDER
~~Y/N~~ VISIBLE BUT BROKEN IN HALF. NEEDS REPLACING.

REPLACED 21/12/18

S. Dyer

- ✓ 13. DUDLEY PORT JUNCTION OF SEDGLEY ROAD EAST PRIOR TO THE TRAFFIC LIGHTS HEADING TOWARDS GREAT BRIDGE. PAMPOST 34. FOAMEX SIGN. IN ORDER ~~Y~~ ~~14~~

WEST BROMWICH

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

OLDBURY

- ✓ 18. TOYS R US CAR PARK JUST AFTER ENTRANCE. FOAMEX SIGN. IN ORDER ~~Y~~ ~~14~~
- ✓ 19. TOYS R US CENTRE OF CARPARK. FOAMEX SIGN. IN ORDER ~~Y~~ ~~14~~
- ✓ 20. EXIT TOYS R US CARPARK AT JUNCTION OF WOLVERHAMPTON ROAD. LAMPOST 207. FOAMEX SIGN. IN ORDER ~~Y~~ ~~14~~
- ✓ 21. AS YOU EXIT JUNCTION 2 (M5) AND ENTER BIRCHLEY ISLAND. LARGE SIGN. IN ORDER ~~Y~~ ~~14~~

S. Dylzel 21/12/18.

All signs in good condition and visible.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN – APPENDIX: “SIGNAGE FOUR”

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

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

EXISTING SIGNAGE (INSTALLED BETWEEN JANUARY 2015 and JANUARY 2021)

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

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

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

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

Claimants

and

PERSONS UNKNOWN

Respondents

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

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

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

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

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

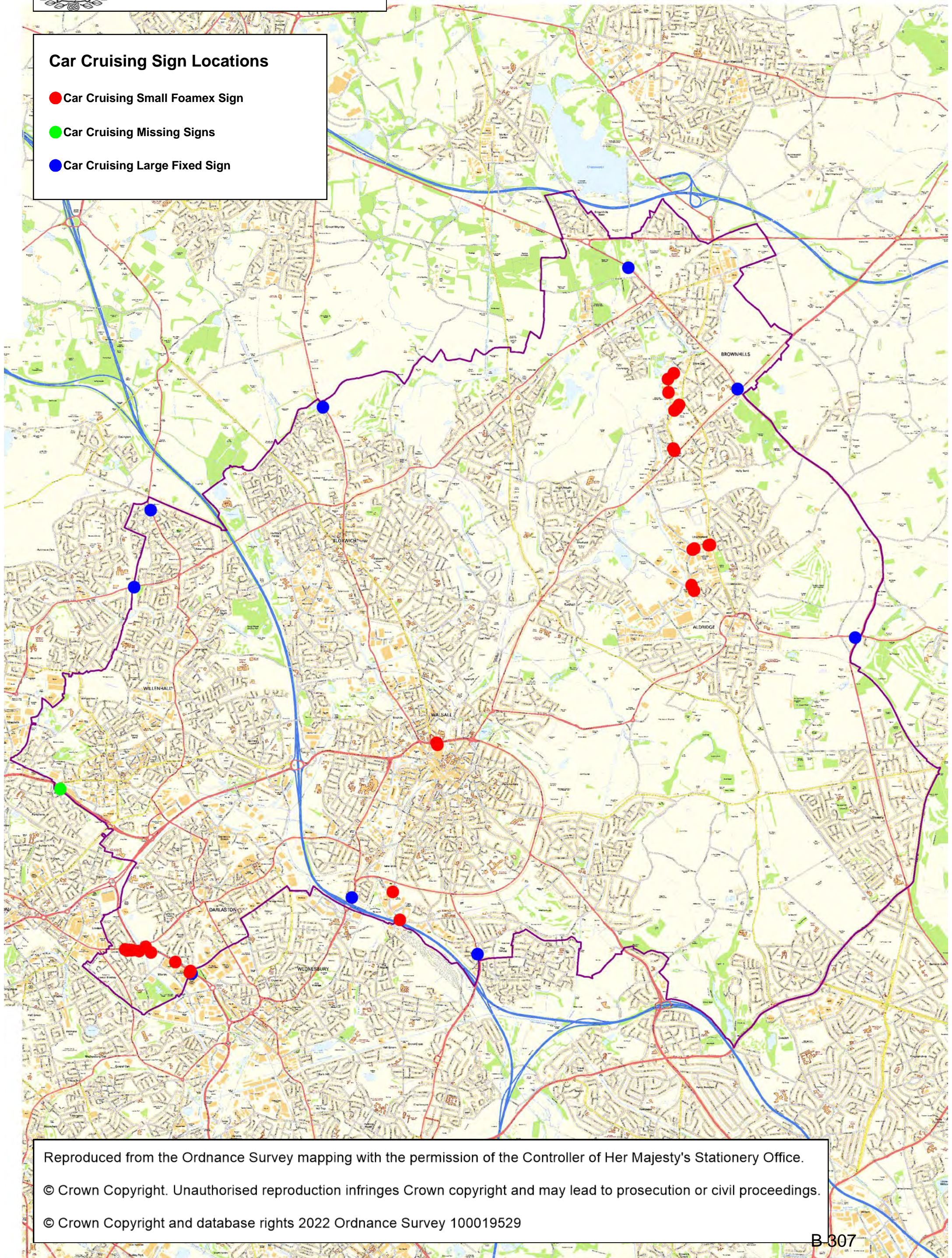
Defendants

COMMUNICATIONS PLAN – APPENDIX: “SIGNAGE FIVE”



Car Cruising Sign Locations

- Car Cruising Small Foamex Sign
- Car Cruising Missing Signs
- Car Cruising Large Fixed Sign



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IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN – APPENDIX: “SIGNAGE SIX”

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

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

EXISTING SIGNAGE (INSTALLED BETWEEN JANUARY 2015 and JANUARY 2021)

No	Location of Sign	Material of Sign (Metal or Foamex)
1.	Black Country New Road/Dangerfield Lane	Metal
2.	Lichfield Road/Coppice Farm Way	Metal
3.	Essington Road/Kewstoke Close	Metal
4.	West Bromwich Road/Greenside Way	Metal
5.	Bescot Road/Fellows Park Gardens	Metal
6.	Chester Road North	Metal
7.	Chester Road/Lichfield Road	Metal
8.	Chester Road/Little Aston Road	Metal
9.	Black Country New Road - Lampposts 12,18 and 19	Foamex
10.	Moxley Road - Lamppost 28	Foamex
11.	Birmingham New Road - Lamppost 12	Foamex
12.	High Street, Moxley – Lampposts 10, 11 and 12	Foamex
13.	Birmingham New Road - Lamppost 35	Foamex
14.	Wisemore, Walsall - Stop Sign (S05)	Foamex

15.	Wisemore, Walsall – Lamppost 6	Foamex
16.	Bescot Crescent – Lampposts 28 and 34	Foamex
17.	Brickyard Lane, Aldridge – Lampposts 3, 6, 28 and 29	Foamex
18.	Northgate Way, Aldridge – Lampposts 1 and 2	Foamex
19.	Coppice Road, Brownhills – Lampposts 3, 5, 21 and 22	Foamex
20.	Maybrook Road – Brownhills – Lampposts 3, 6, 13 and 20	Foamex

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

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

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

Save for the proposed signs detailed in Wolverhampton City Council's Schedule of proposed signage (September 2022) that cross the boundary from the local authority area of Wolverhampton City Council into the local authority area of Walsall Metropolitan Borough Council, which Walsall Metropolitan Borough Council will ensure are installed in Walsall at the locations specified in Wolverhampton City Council's schedule of proposed signage should the honourable Court be minded to grant an injunction, Walsall Metropolitan Borough Council does not seek to install any further new signs at any locations in the local authority area of Walsall Metropolitan Borough Council at the time of writing (September 2022), in the event the honourable court is minded to grant an injunction.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

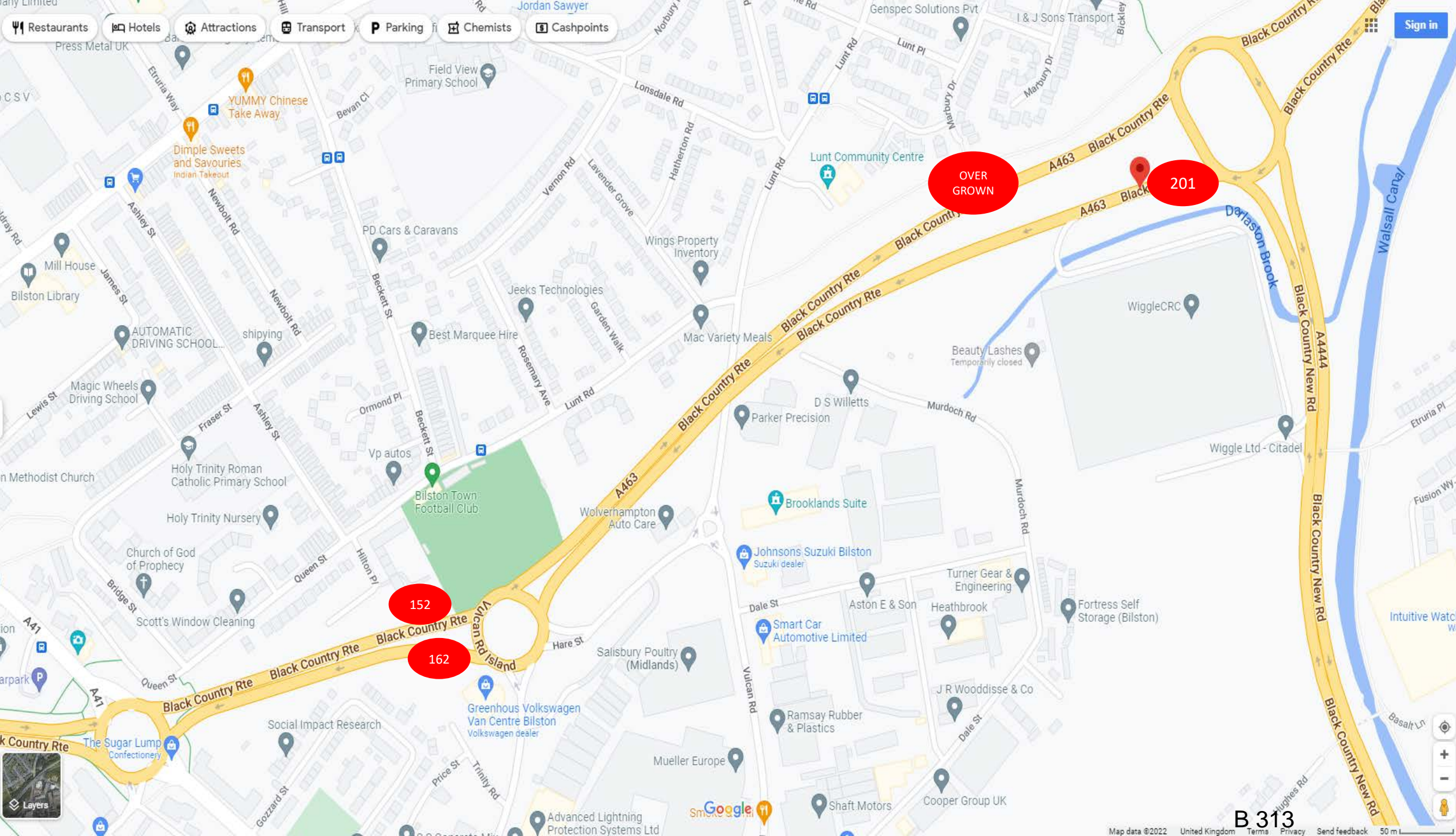
Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN – APPENDIX: “SIGNAGE SEVEN”

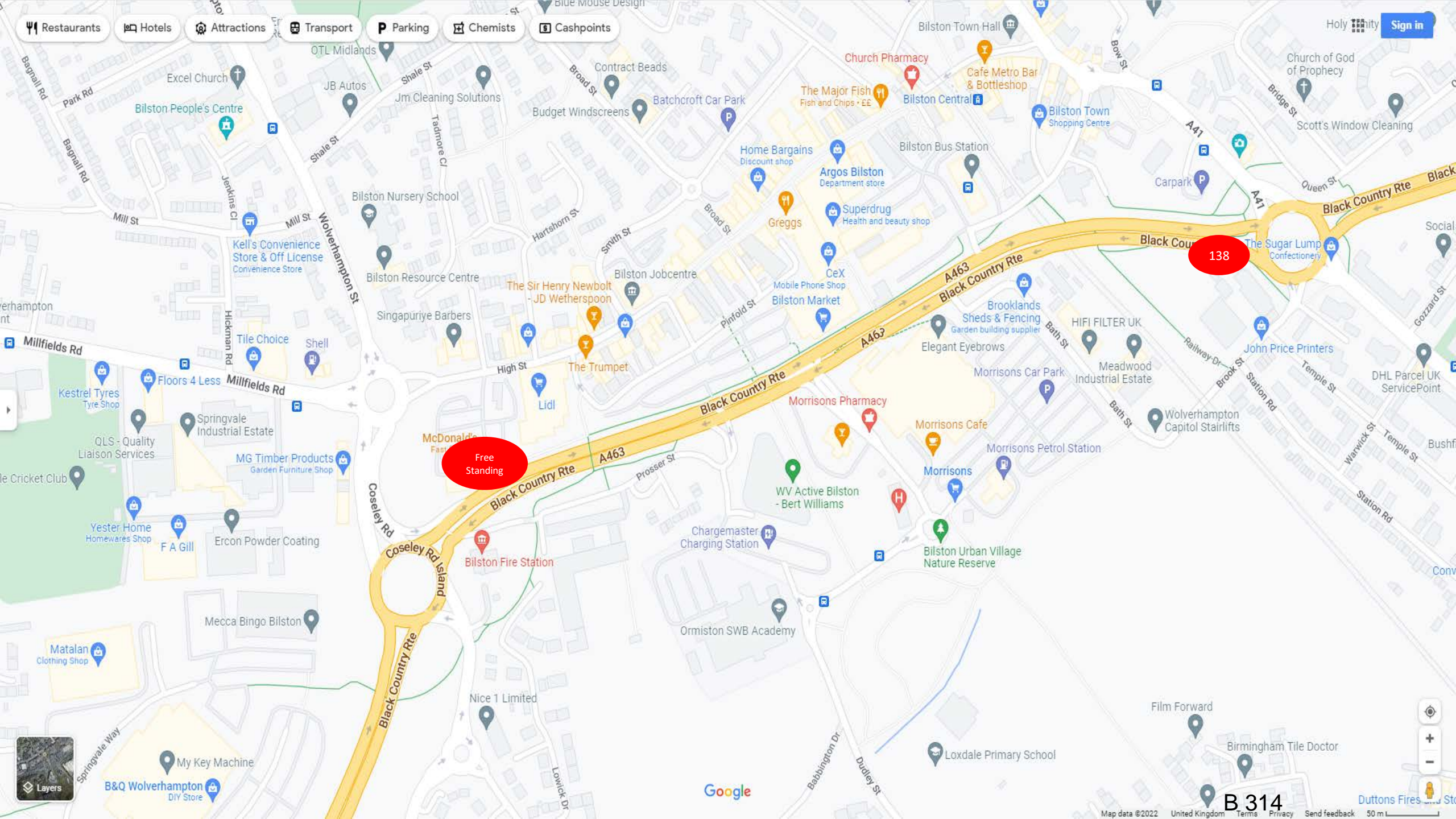


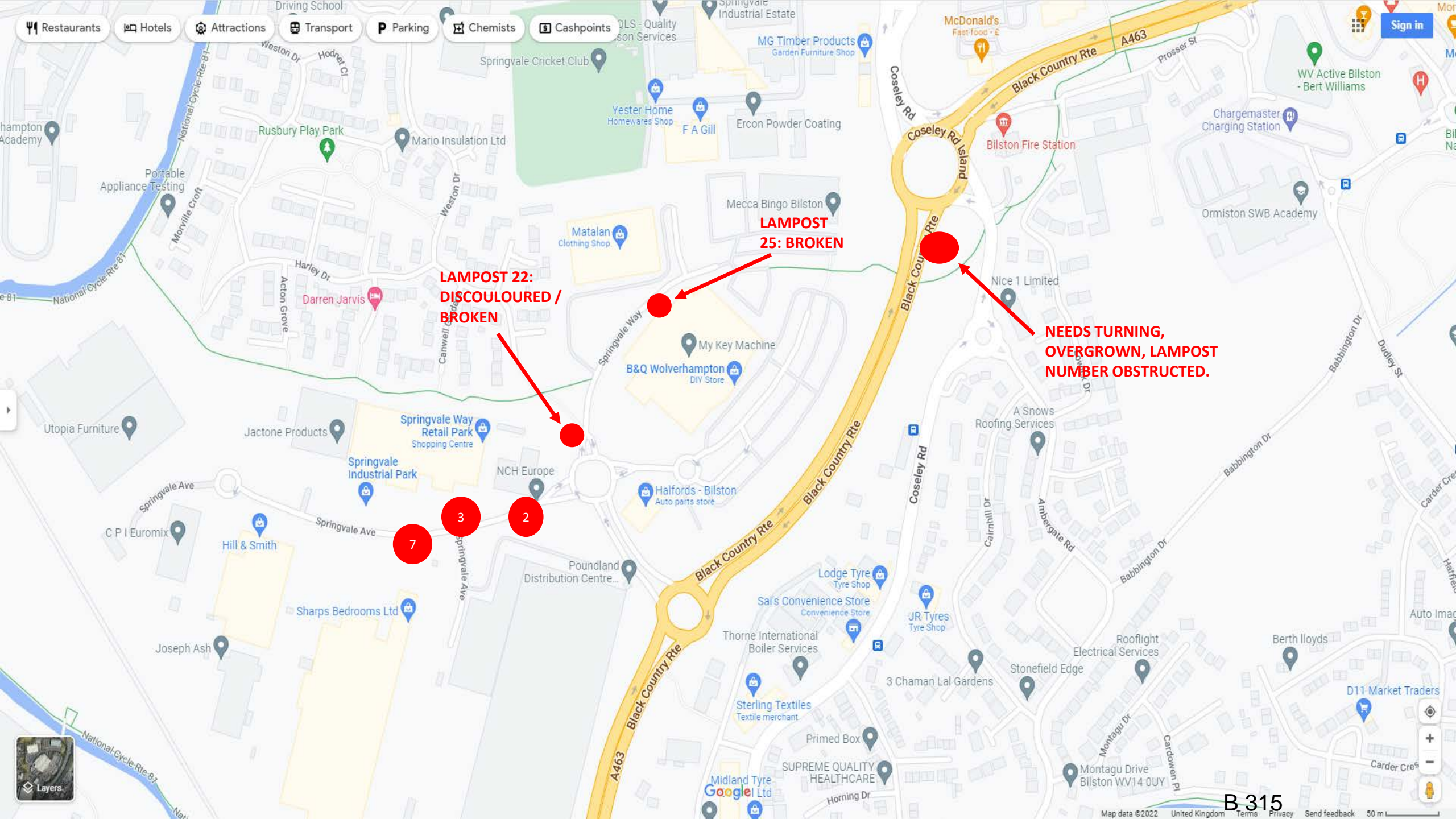
OVER GROWN

201

152

162





Restaurants Hotels Attractions Transport Parking Chemists Cashpoints

Sign in

LAMPOST 22:
DISCOLOURED /
BROKEN

LAMPOST
25: BROKEN

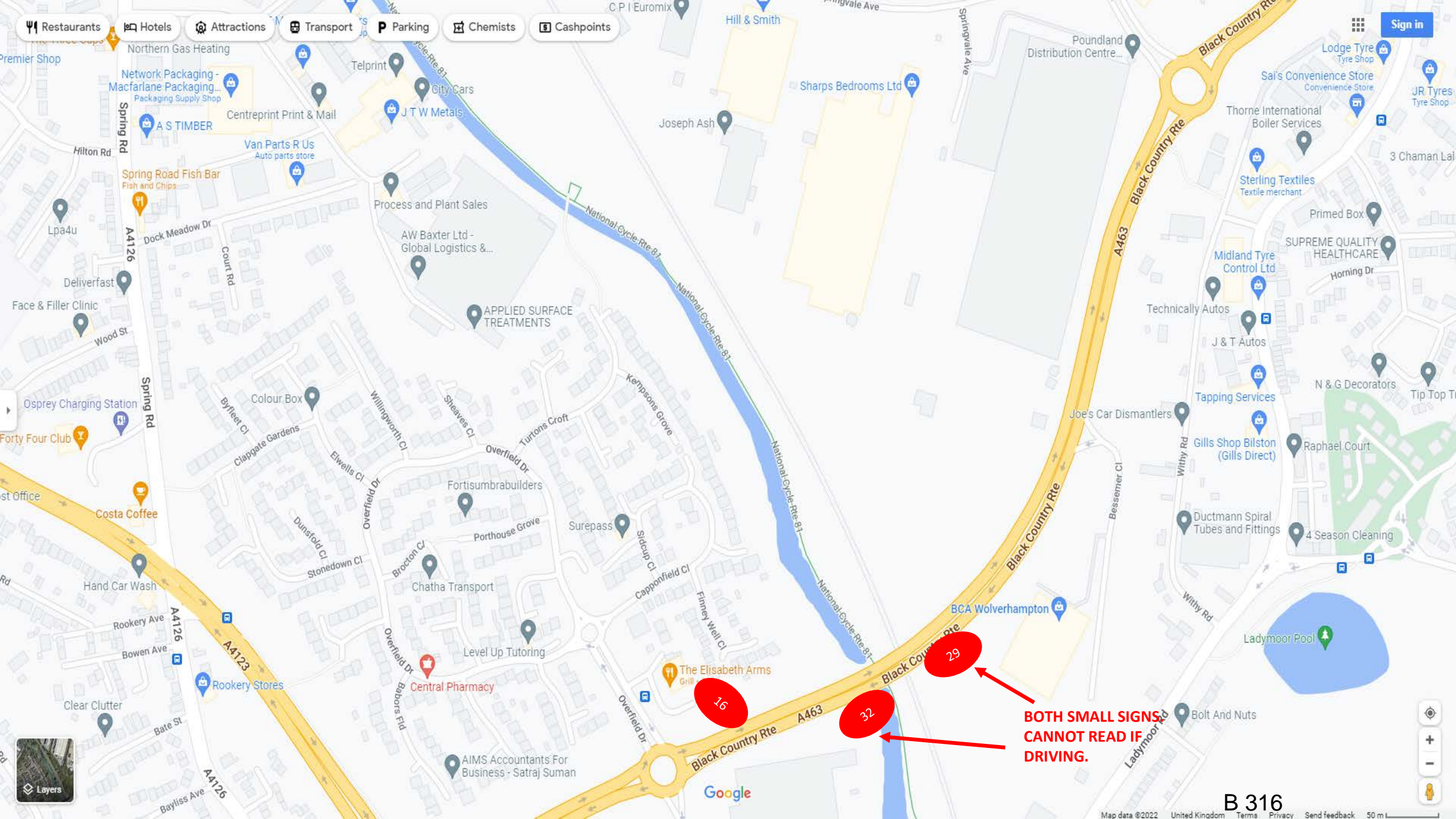
NEEDS TURNING,
OVERGROWN, LAMPOST
NUMBER OBSTRUCTED.

7

3

2

B 315



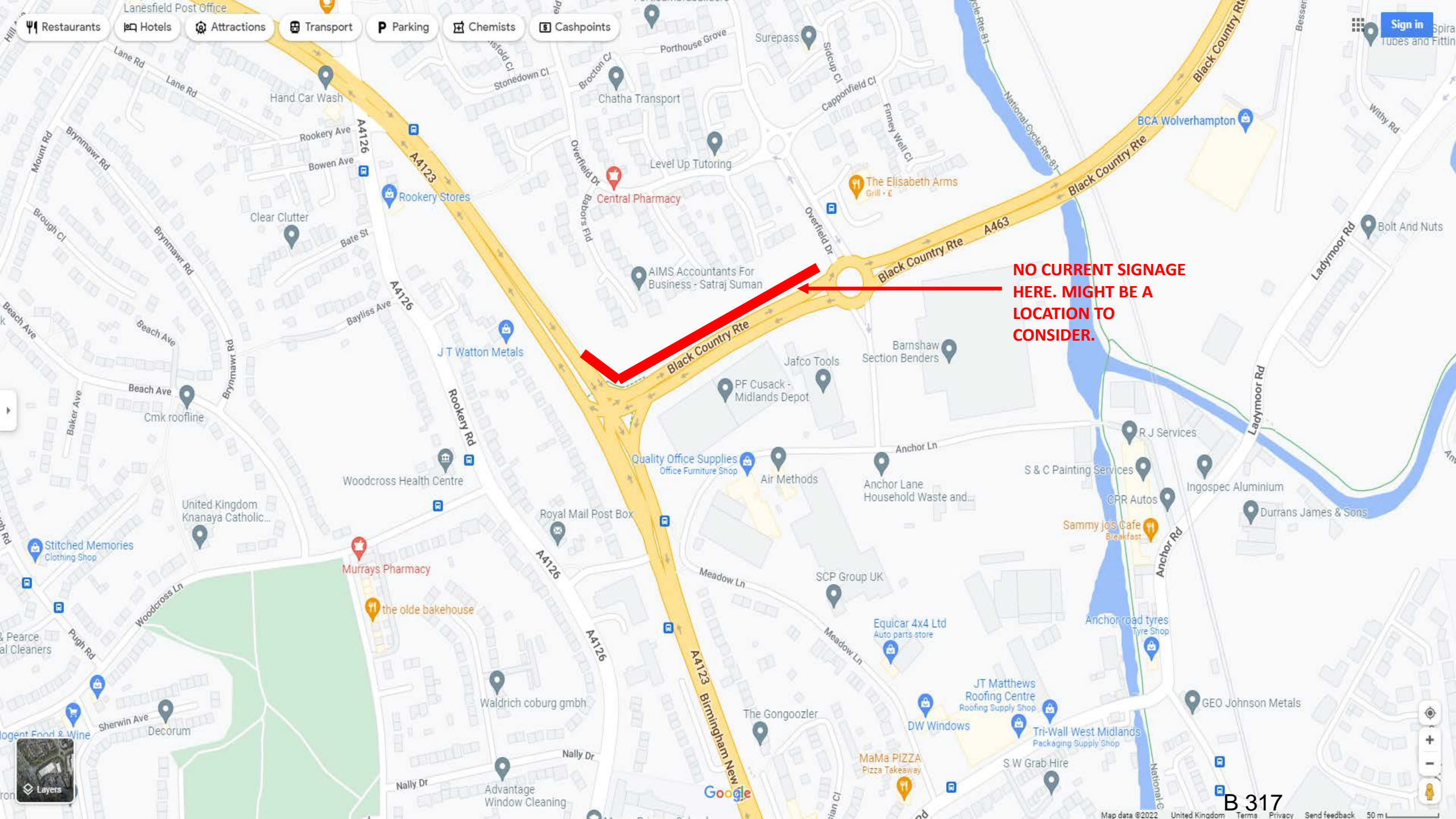
**BOTH SMALL SIGNS
CANNOT READ IF
DRIVING.**

16

29

32

B 316



Restaurants Hotels Attractions Transport Parking Chemists Cashpoints

Sign in

NO CURRENT SIGNAGE
HERE. MIGHT BE A
LOCATION TO
CONSIDER.

B 317

BLACK COUNTRY ROUTE

201 – LARGE SIGN

162 – LARGE SIGN

152 – LARGE SIGN

1 X OVERGROWN SIGN (LAMPPOST NUMBER NOT VISIBLE)

138 – LARGE SIGN

1 X FREE STANDING SIGN

1 X TURNED SIGN, LAMPOST NUMBER NOT VISIBLE

29 – SMALL SIGN

32 – SMALL SIGN

16 – LARGE SIGN

SPRINGVALE WAY

22 – SMALL SIGN, COLOUR FADED

25 – SMALL SIGN, BROKEN

SPRINGVALE AVENUE

7 – SMALL SIGN

3 - SMALL SIGN

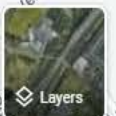
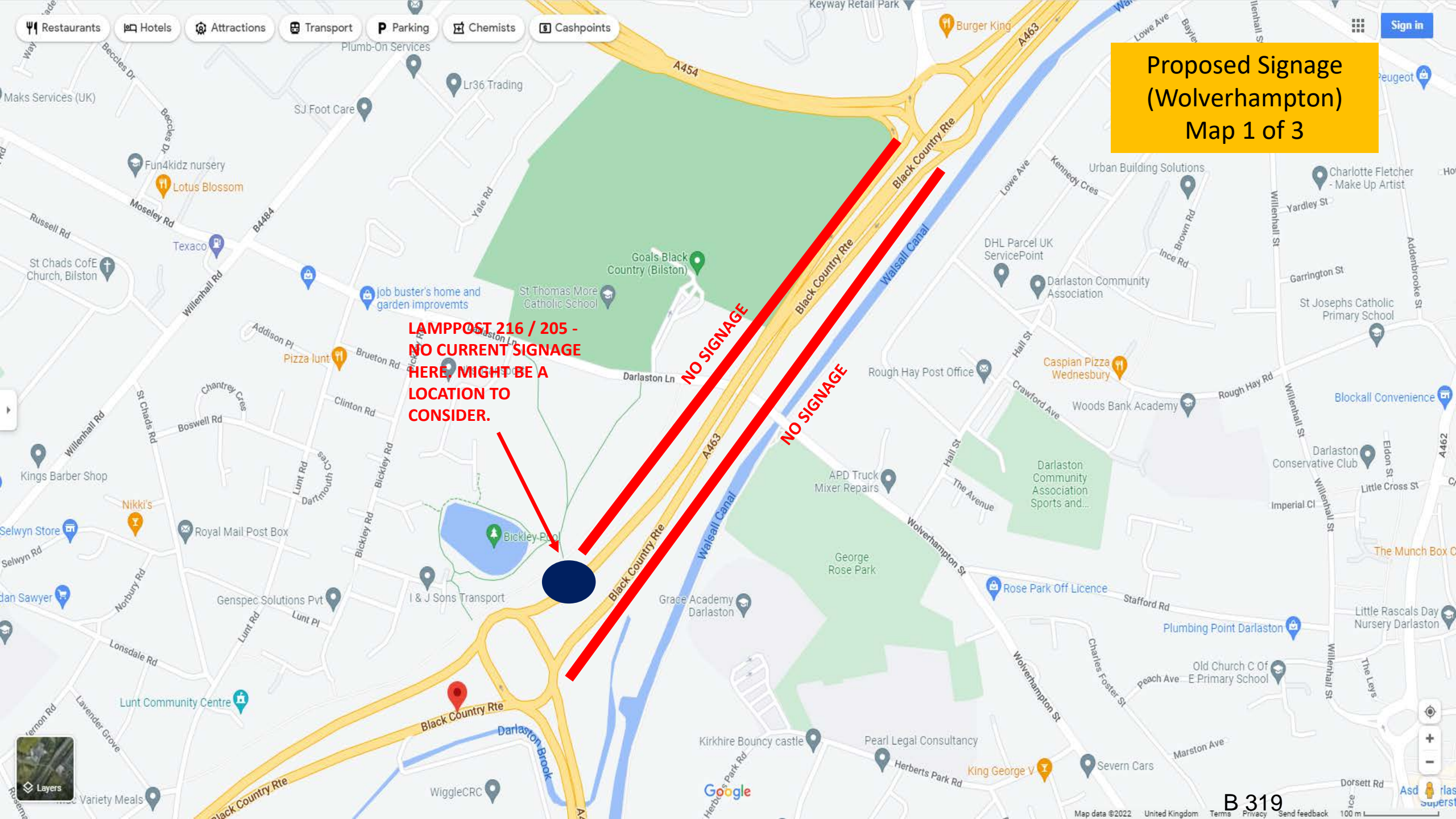
2 – SMALL SIGN

Proposed Signage
(Wolverhampton)
Map 1 of 3

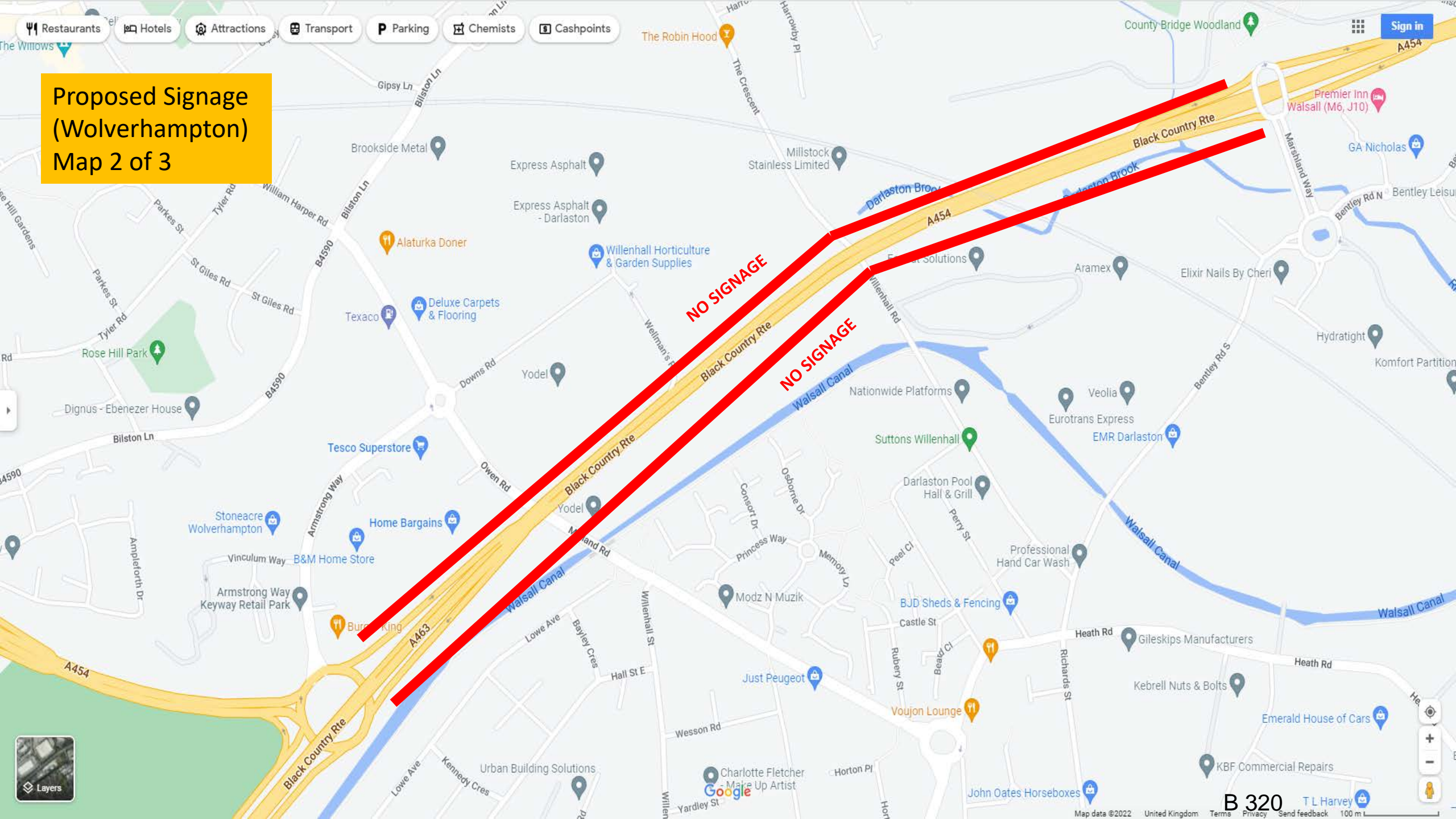
LAMPPOST 216 / 205 -
NO CURRENT SIGNAGE
HERE, MIGHT BE A
LOCATION TO
CONSIDER.

NO SIGNAGE

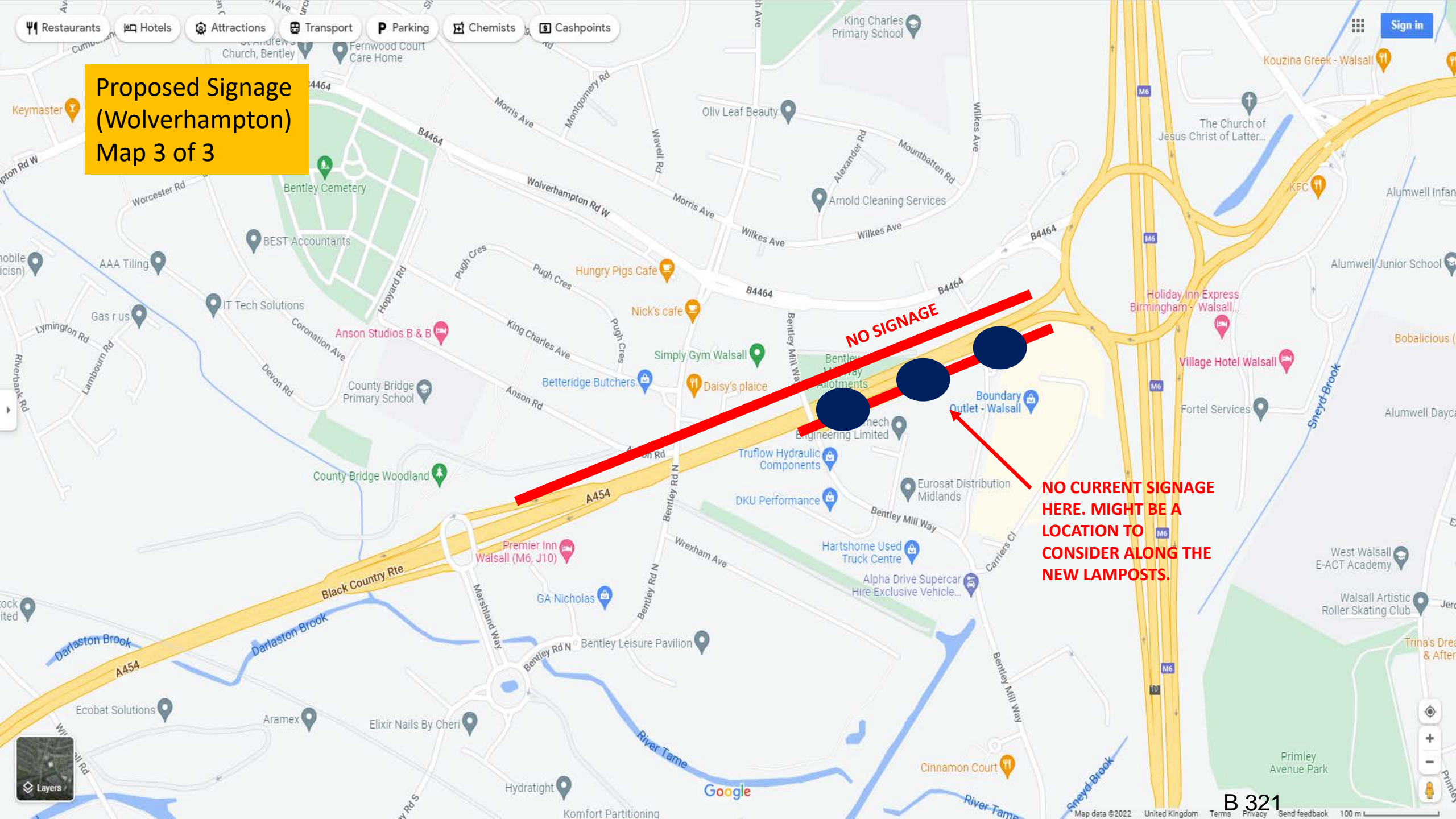
NO SIGNAGE



Proposed Signage
(Wolverhampton)
Map 2 of 3



Proposed Signage
(Wolverhampton)
Map 3 of 3



NO SIGNAGE

NO CURRENT SIGNAGE
HERE. MIGHT BE A
LOCATION TO
CONSIDER ALONG THE
NEW LAMPOSTS.



- IT WOULD BE SUGGESTED THAT SIGNS ARE CONSIDERED ALONG THE BIRMINGHAM NEW ROAD, AS THIS IS USED AS A THROUGH ROUTE BETWEEN LOCATIONS IN WEDNESBURY / WEST BROMICH AND WOLVERHAMPTON.
- FROM BIRMINGHAM NEW ROAD, IF GOING BACK TOWARDS THE M6 ROUNDABOUT THERE ARE NO SIGNS WHATSOEVER.
- IT WOULD BE SUGGESTED POTENTIALLY TO HAVE A FEW IN BOTH DIRECTIONS, PARTICULARLY AT LAMPOST NUMBER: 216 AND 205.
- IT WOULD ALSO BE BENEFICIAL TO HAVE SIGN / SIGNS WHEN JOINING THE BLACK COUNTRY ROUTE FROM THE M6, ON A NEW LAMPOST FOR EXAMPLE. (CANNOT PROVIDE A NUMBER AS NOT LABELLED YET).

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN – APPENDIX: “SIGNAGE EIGHT”

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

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

EXISTING SIGNAGE (INSTALLED BETWEEN JANUARY 2015 and JANUARY 2021)

No	Location of Sign	Material of Sign (Metal or Foamex)
1.	Black Country Route near Vulcan Road Roundabout near Bilston Town Football Club (Lamppost 152)	Metal
2.	Black Country Route near Greenhous Volkswagen Van Centre (Lamppost 162)	Metal
3.	Black Country Route parallel to Lunt Road/Marbury Drive Junction	Metal
4.	Black Country Route parallel to Darlaston Brook (Lamppost 201)	Metal
5.	Black Country Route parallel to McDonalds Off Coseley Road Island	Metal
6.	Black Country Route parallel to Nice 1 Limited Off Coseley Road Island	Metal
7.	Black Country Route near The Sugar Lump (Lamppost 138)	Metal

8.	Black Country Route (Lamppost 16)	Metal
9.	Black Country Route (Lamppost 29)	Foamex
10.	Black Country Route (Lamppost 32)	Foamex
11.	Springvale Avenue (Lamppost 2)	Foamex
12.	Springvale Avenue (Lamppost 3)	Foamex
13.	Springvale Avenue (Lamppost 7)	Foamex
14.	Springvale Avenue (Lamppost 22)	Foamex
15.	Springvale Avenue (Lamppost 25)	Foamex

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

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

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

No	Location of Sign	Material of Sign (Metal or Foamex)
1.	Black Country Route (Lamppost 205)	Metal
2.	Black Country Route (Lamppost 216)	Metal
3.	Black Country Route Between I & J Transport Ltd and Roundabout with exit for Armstrong Way Keyway Retail Park 10 no. signs in each direction (20 no. Signs in total) (Marked as area between two bold red parallel lines on map "Proposed Signage (Wolverhampton) (Map 1 of 3)"	20 Foamex Signs

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

C. SECTIONC- Overarching Statements of Professionals for Each Claimant
Local Authority

Statement filed on behalf of: Dudley MBC
Statement of: Kathryn Jones
Statement No: 1
Dated :
Filed:

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

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

**STATEMENT OF
KATHRYN JONES**

**I, KATHRYN JONES, Director for Housing and Communities and Interim
Head of Community Safety, will say as follows:-**

1. I am employed by Dudley Metropolitan Borough Council as Director for Housing and Communities and, in addition, I am covering the currently vacant position of Interim Head of Community Safety. As the Borough's strategic lead for community safety 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. From conversations with my predecessors, Susan Dicks and Alun Goode, I am aware of the previous application that was made to the High Court in 2014 which saw the four Black Country Councils (Dudley, Sandwell, Walsall and Wolverhampton) seeking an injunction to prevent “car cruising” across the four local authority areas. The injunction was granted by His Honour Judge Owen QC, sitting as a High Court Judge, on 1st December 2014 and came into force on 2nd February 2015 but that order lapsed in January 2021 and a new injunction is now being sought.
3. As I am new to this role, I have no first-hand knowledge of the problems caused by car cruise activity in the Dudley Borough. However, I understand from speaking to Susan Dicks and other colleagues that there have been ongoing issues with car cruising activities in the Dudley Borough and that these may have increased in the period of time since the injunction lapsed.
4. As described in evidence presented to the Court at the original injunction hearing car cruising has been a recurring problem for local residents, motorist and businesses in the Black Country for many years. As far as Dudley is concerned, at the current time, car cruising is particularly prevalent along Manor Way in Halesowen, at Tesco Extra and

Showcase Cinema, both situated at Castle Gate, Dudley and around Stourbridge Ring Road, but other locations are affected too. This activity is continuing to cause harassment, harm and distress in Dudley as well as in other boroughs within the Black Country.

5. I am aware that a number of businesses including Tesco, Showcase Cinema and Shell Petrol Station on Manor Way have made witness statements in these proceedings along with the local MP, James Morris. I am also aware that there are residents who are in fully support of the application for a fresh injunction but who are reluctant to come forward due to fears that their identity will be disclosed and there may be reprisals.
6. The injunction is required to protect law abiding members of the public and businesses who have suffered for many years from the negative impact of car cruising. I believe it is vital that strong action is taken to prevent car cruises taking place and to deter those who are considering taking part in this activity. This deterrent element is particularly important in light of the fact that, since April 2016, several young people have died in high-speed road traffic collisions within the borough of Dudley. I believe that activities prohibited by car cruising may have been a factor in at least one of these fatalities. One fatality, which occurred on Boxing Day 2016 and resulted in the death of a 20 year old woman, was on Tesco car park in Dudley which continues to be a magnet for car cruisers to this day.

7. The activity of car cruising is noisy, dangerous and illegal, obstructing highways and the premises bordering them, damaging property and puts spectators or other road users at risk of injury or worse. The noise of revving engines, car horns, racing cars and spectators, frequently disturbs local residents who are trying to sleep as well as those conducting commercial business.
8. Large numbers of spectators can gather to watch the car cruising and often children are present amongst these spectator groups. Rowdy behaviour, shouting, foul language, drug taking, criminal damage and littering are often a by product of the car cruises.
9. As stated above, this activity is taking place across all four of the Black Country local authority areas. During the period that the previous injunction was in force, following a carefully orchestrated extensive publicity campaign, on the whole the injunction had an extremely positive impact across the four Black Country Local Authority areas, significantly reducing the problem and eliminating it altogether in some of the former car cruising “hotspot” areas. There is a risk if the new injunction does not include the Dudley borough that the car cruisers will visit Dudley as a result of being displaced from other areas.
10. For the above reasons I fully support the application for a fresh Injunction within Dudley and the Black Country prohibiting car cruise activities.

11. 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



27.7.2022

Signed Date

Print Name in Full :KATHRYN JONES

1) Claimants
2) P Sandhu
3) First
4) PS1 – PS2
5) 27th September
2022

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

**PERSONS UNKNOWN ENGAGING IN DANGEROUS DRIVING AND
ASSOCIATED ACTIVITIES**

Defendants

WITNESS STATEMENT OF PARDIP SANDHU

I, Pardip Sandhu of Sandwell Council, will say as follows: -

1. I am employed by Sandwell Council as a Town Lead Anti-Social Behaviour Officer, based in Oldbury however I primary responsibility for dealing with Anti-Social Behaviour (ASB) cases in West Bromwich, and car cruising around the Borough of Sandwell.
2. As part of my duties I investigate and action complaints of Anti-Social Behaviour (ASB), interview witnesses, and victims of ASB, take action against perpetrators, prepare witness statements and attend court where needed as a professional witness.

3. I make this statement from my own personal knowledge, and from liaising with the local Policing Team.
4. I am aware that there was previously a car cruising injunction in place that covered areas in the Black Country including Wolverhampton, Walsall, Dudley and Sandwell. This Injunction was to prevent boy racer activity (car cruising).
5. I am aware that when the Injunction was applied for Sandwell Council supported all the applicants in obtaining the order.
6. Since obtaining the order the Injunction had a positive impact on residents, local business partner agencies and the Police. There had been a marked reduction in car cruising in the Borough. However there still has been incidents for when the Council has had to take further action, including sending tenancy warning letters to local residents.
7. On 9th April 2021 I contacted Resident A who previously supported this injunction and advised that they no longer live in Sandwell anymore, however still supported this injunction due to safety concerns for other residents and also the noise nuisance.
8. I also contacted another resident who I will refer to as Resident B who stated that he still hears the car cruisers racing up and down and had safety concerns for the young children that play in the area. Resident B stated that he would fully support the injunction to help reduce the noise nuisance.
9. Resident C who was also contacted stated that they no longer lived in the area, however again fully supported the injunction due to safety concerns and high levels of noise nuisance.

10. Resident D also supported the injunction due to safety concerns. I also spoke with Resident E who stated that they were aware that there were regular meets on a Sunday evening at Kenrick Way, West Bromwich and didn't go out after 8pm on a Sunday evening. They further stated that they would fully support the injunction due to safety concerns and due to the noise nuisance.
11. The Car Cruising Injunction was having a positive impact within Sandwell and the number of breaches previously reported had been reduced, however more recently the reports have started to escalate.
12. This Injunction is still necessary as residents have complained that the noise nuisance is still ongoing in all parts of Sandwell including West Bromwich, Wednesbury, Rowley Regis, Smethwick and Oldbury so the Injunction needs to continue to provide the residents protection.
13. During 2021 – 2022 Sandwell Council received over 200 reports from local residents reporting car cruising and nuisance bikes activity throughout Sandwell. The Police and the Council will seek to use the injunction to tackle and enforce this activity in the borough. A copy of these reports and reference numbers generated after being logged on the Councils case management system is here marked as **“PS1”** which I exhibit to my statement.
14. On 19th September 2022 there was a car cruising incident reported by a resident on Kenrick Way, West Bromwich. This incident was captured on video which I exhibit as **“PS2”** to my statement.

15. I therefore support the car cruising injunction so that if there are any further breaches then positive and swift action can be taken to enforce this order and protect local residents and our communities.

This is the end of my witness 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.’

A handwritten signature in black ink, appearing to be 'B. A. D.', written over a horizontal line.

Signed. _____

Dated. 27th September 2022

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

CLAIM NO:

B E T W E E N:

(1) WOLVERHAMPTON CITY COUNCIL

**(2) DUDLEY METROPOLITAN
BOROUGH COUNCIL**

**(3) SANDWELL METROPOLITAN
BOROUGH COUNCIL**

**(4) WALSALL METROPOLITAN
BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT "PS1"

I verify that this exhibit is marked as "PS1" in my statement.

IN THE HIGH
COURT OF
JUSTICE
QUEEN'S BENCH
DIVISION

CLAIM NO:

B E T W E E N:

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

and

PERSONS UNKNOWN

Defendants

EXHIBIT "PS2"

I verify that this exhibit is marked as "PS2" in my statement.

Claimants

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

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Defendants

**WITNESS STATEMENT OF
PARDIP SANDHU**

1) Claimants
2) P Sandhu
3) First
4) PS1 – PS2
5) 27th September
2022

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

**PERSONS UNKNOWN ENGAGING IN DANGEROUS DRIVING AND
ASSOCIATED ACTIVITIES**

Defendants

EXHIBIT PS1

This is the document referred to as “**Exhibit PS1**” in the witness statement of Pardip Sandhu dated 27 September 2022.

Oldbury	
Incident reference number 65931 dated 5/4/21	
Nuisance bike report from Police; caller reports bike was returned to Pitfields Road - Attached to images	
66095 on 17/4/21	
Dear Sir/Madam. I would like to report a dangerous driving on Langley Green area (Crosswells Rd. Station Rd. Dog Kennel Ln, Joinings Bank and Vicarage Road). There is a lot of racing cars day and night	
66902 on 9/6/21	
We have a continual issue with trail bikes being driven around the park but particular behind the houses that overlook the park, This is done specifically to annoy residents who have been out to the b	
67094 on 19/6/21	
Every single day especially the last few months at least 6 times a day especially in evening there are couple cars and a motorcycle that race down birchfield lane. It wakes up my 3 grandchildren each	
68110 on 30/7/21	
Every day and all throughout every night, cars drive at very high speeds up Hill Top Road. I am worried that there will be a serious accident as the cars have to break hard at the bend further up Hill	
68649 on 31/8/21	
Almost every night/early hours of the morning there are people driving very quickly and loudly (revving engines) around barrs street/Ethel street and farm road. They circle round around 5 times before	
71176 on 31/1/22	
Motorbikes causing nuisance on Barnford Park	
71200 on 1/2/22	
Bikes on Barnford Park	
71749 on 25/2/22	
Motorbikes - riders wearing balaclavas - see notes	

71941 on 6/3/22	
Cars are speeding down Castle, rd East and the drivers are losing control of their cars this usually happens early morning when its dark. They lose control off their cars on the junction of Castle rd East and Hadzor rd its a sharp bend, as a result of this happening the car/van has ploughed into our wall ,its happened 6 times now and cost me alot of money in repairs. The noise from the accidents and people braking sharply, cars speeding and making loud noises has caused us sleepless nights and high Anxiety. The Corner bend really needs to be assessed and arrow signs put up showing the sharp bend or speeding warning lights or signs please take this seriously, we do not want anyone getting hurt ,it is also a school road.	

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Rowley Regis
57320 on 25/3/20
Two white males in a red Ford Fiesta speeding, wheeling spinning and driving dangerously along Bell End. It also has a very loud exhaust causing immense noise pollution. The car is supposed to be blue
58273 on 29/4/20
COVID-19 INCIDENTS:Nuisance motorbiking reported on Warrens Hall Nature Reserve. Reported to be entering from the Vale Entrance.Email and photographs attached.
58416 on 5/5/20
Constant youths on scooters, racing through the pathway opening between Admirals Way and Moor Lane Many speeding down Admirals Way where children play. Many don't have crash helmets on. They also d
60627 on 4/8/20
For the last two hours a motorbike has been joy riding in and out of Haden Close and around Haysech. No description sorry. I can hear it constantly and it is too late to be able to get a description
66541 on 20/5/21
Petrol motorbike coming from the nature reserve and through the park by the pond
66581 on 24/5/21
Male on petrol quad bike driving through park, around the pondVery noisy and dangerous for my children and dog
66621 on 25/5/21
While walking around warrens hall nature park two youths on off the Road bikes came tearing past on walk paths then around the park tearing up fields It?s only a matter of time Before someone getsSeri
68374 on 14/8/21
Three motorbikes cruising around Haysech, The Crescent, Haden Close . Constantly repeating this journey throughout the day
69317 on 4/10/21
Reports of off road bikes. Youths believed to reside at 22 Mill Road, Cradley Heath
69642 on 25/10/21
St Giles court - Received a call from flat 32 about youths riding around block on scooters without number plates or helmets. Found youths with scooter sitting outside block, Called police on the 9,s l
69694 on 27/10/21
St Giles Court - Noticed the males that have been hanging around with the mopeds leaving the car park. Reviewed the footage and found some good facial images of them. These are the same males from inc
70593 on 28/12/21
Bikes coming to this address usually off road bikes so coming across public spaces or on road, ripping up local grassy areas persistent smell of marijuana and loud voices with constant foul language,
70690 on 30/12/21

Annon report that a male occupant from Wylde Crescent is riding around The Crescent and Stuart Road on a small off road motor bike with no helmet churning up the grass.
70887 on 17/1/22
Reports of off road bikes coming from and linked to Mill Road, Cradley Heath
70937 on 20/1/22
Reporting off road bikes/quads linked to this addressIAW
70950 on 20/1/22
Reporting illegal off road bikes coming and going from Congreaves Walk
71033 on 25/1/22
Ongoing reports of vehicle nuisance and loud music from vehicles at the viewing area of View Point

Smethwick
61991 on 9/10/20
Daily occurrence of cars speeding down Montague Road. Seems to be 3 to 4 cars including a blue VW Golf, Grey Mercedes and white car (don't know what the model is). Excessive speeding is occurring on t
65421 on 19/3/21
At 3.55 today the woman who rents greenfield road her son was riding a motorcycle up and down the road dangerously pulling wheelies and not wearing a helmet there are also four other youths at the
67965 on 24/7/21
Quad bikes in Warley Woods. EPO's attended but did not see any bikes in the area. Police and EPO's asked to increase patrols in the area.

Tipton
56725 on 19/2/20
From: Gordan Brown <[REDACTED]>Sent: Wednesday, February 19, 2020 5:34 pmTo: richard.phillips@west-midlands.pnn.police.uk; Maria CromptonSubject: Bikes at sheepwash nature reserve Dear S
57288 on 23/3/20
At 18:51hrs on 23/03/2020 i was visited at my home address (bordering Sheepwash Urban Park) by an unknown male reporting 5 males on off road bikes on Sheepwash Urban Park.The male was asking if there
57342 on 25/3/20
On 26/03/2020 from 13:41hrs onwards, a group was gathered at and outside 56 Elizabeth Road. This group were workign on Motorcycles and then riding them up and down Elizabeth Road at speed.The group a
23/3/2057824
Outside my home on Great Bridge roundabout, I have noticed over the 14 months I have lived in this property, that there are a high volume of boy racers/fast speeding vehicles here. They speed around t
57916 on 20/4/20
Motorbikes are being raced up and down for hours making a loud and annoying noise almost every evening and weekend and disturbing my baby. I cannot see past the trees but it is so loud it must be dist
59238 on 8/5/20

Last year we had a lot of problems with this little girl macy and her friends going around our private car parked and climbing on this old car which been park there since 2012 and not been move .Th
60616 on 1/8/20
Intelligence recieved from Matt Darby (Operational Manager - Parks and Countryside). Chris Adams of 97 Cophall Street reporting motorbikes on the park behind her house.Email chain attached.
61573 on 21/9/20
This lad lives at number 80 Ivy Road Tipton DY49QL the 21 /09/2020 at 17.08 he and another 13 year old lad were riding up and down Ivy Road on the pavements they nearly ran two people over on two Oc
62227 on 19/10/20
Please note this is the same report already submitted but wrong address was provided - Address is 20 Beech Crescent, Tipton, DY4 0RAPolice have since attended and Bikes haven't been seen for two d
63248 on 5/12/20
Abandoned and Burnt out Motorbike identified on Sheepwash Urban Park by complainant while walking dog.
63961 on 31/12/20
Email from resident to me as attached - Yesterday a kid on a motorbike was racing across the football pitches at Medley Gardens. It was a new bike and they took it into the garden of 95 Cophall Street
64033 on 8/1/21
Cars are pulling up on the car park which has nothing to stop people pulling on there while the pub remains closed, cars always appear in 2's or 3's and park close together in the far corner way from
64328 on 3/1/21
Most evenings vehicles mount path have smashed wooden fencing down and drove over feild , vans pull up most sundays quad bikes and scrambler bikes , groups of people even children passengers on bikes
67562 on 8/7/21
08/07/2021 : "21.00 hours"Cllr Hackett called in a problem with nuisance bikes on the greenspace near to myvod road. EPOs attended, saw one motorcyclist who left upon their arrival.Some footage was ca
67592 on 12/7/21
See attached report - no offenders identified, motorbikes racing around Addison Road, Wednesbury at 15:30 on 9th July 2021
67594 on 9/7/21
ouncillor Hackett reported youth on motorbikes going up and down on Addison Road. upon arrival on site three youth were seen on mountain bikes, dash cam footage taken.whilst conducting mobile patrol E
68122 on 2/8/21

Hi Shaun, we have a problem in our street and it is mostly one family who most of them dont live in the street, the 2 grandsons are racing a car and a motorbike up and down the street well in to the e

70752 on 9/1/22

Two young people using linear park as a scrambling track. The noise and speeding down the pathways really Scared my dogs whilst on our walk, as well as creating terrible air pollution? so much for a n

71291 on 7/2/22

Youngsters using the 'grey path' to ride mini motorbikes up and down on the grass between the read of farmer way and rear of Bertram close. It is so loud and the ground is being churned up by them.

Maybe coming off 'lost city' onto the communal land.

Wednesbury

55457 on 5/1/20

Most days at various times mainly afternoons, 4-5 off road bikes with no registration marks come through the public right of way in front of my house and past the children's play area From Harvills Ha

56649 on 23/2/20

Friarpark- Wednesbury 4 males seen on motor bikes doing wheelies along the road. PASSED FOR INFORMATION, footage saved.GH

56884 on 3/3/20

Friar Park - One white male, 2 x teenage lads and 3 x young children, seen riding a small motor bike around the play ground and the waste ground at the rear. PASSED FOR ACTION, footage saved, calle

57797 on 25/3/20

Scott Norton failed to stop by police while driving with child in car - non crimed and MARF completed to Children's Services as driver has no licence

57939 on 18/4/20

Friar Park - As requested by Susan Cooper, A silver car seen doing handbreak turn by island linking Bassett rd and Manor rd. Also sighting of possible the same car driving off Crankhall Lane. PASSE
58817 on 18/5/20
Friar Park - Five IC1 males and an IC1 female riding a moped around the field behind the Millenium Centre. Police called on 999, log number: 3499/18052020 Updated the Police, via live chat, at 1925
59921 on 2/7/20
Friar Park - Footage saved of an off road motorbike being ridden without a helmet. PASSED FOR INFORMATION. AA.
59924 on 1/7/20
Faiar Park - Car is seen doing donouts on the round about. PASSED FOR ACTION. AA.
60193 on 12/7/20
Wednesbury- noticed tyre marks on car park on playback there was boy racers, footage saved. PASSED FOR INFORMATION. AA.
60431 on 22/7/20
Friar Park- Lee Holden of Manor Road rang the office to inform us there are two males driving round on moter bikes. Viewing the camera's the bikers enter Manor Road then they turn left into Bassett R
60483 on 27/7/20
Behind my garden there is a path between Anson Road and Bagnall street. I put 25 July, but regulary minimum once a week someone is riding a motorbike (sound like cross motorcycle) or quad on this path
60925 on 14/8/20
There are two quad bikes and an off road bike travelling round the Woods estate. I cannot see any number plates. The motor cyclist has bean doing wheelies on Coronation Road. They are probably doing m
61467 on 12/9/20
2 to 3 offroad bikes flying up and around dorsett road Enters 123 dorset road address Young males
61666 on 23/9/20
Starting bike outside the property flying up and down dorset road and carisbroke road with 2 more motrbikes riding like idiots
61725 on 26/9/20
Ive been reporting this numerous of times now and nothing is seeming to get done about it they are coming from 123 dorsett road flying up and down the streets on 3 off road bikes all it takes is for
62895 on 20/11/20
Friar Park- Noticed three males repairing a mini scrambler motor bike at 17 School Road. One of the males was seen riding the bike without a helmet along School Road. PASSED FOR ACTION. AA.
63555 on 12/12/20

Friar Park 2 bike seen ridden on the wrong side of the road. Passed for information NL
65861 on 2/4/21
██████ of █████ Crankhall Lane reporting issues with off road bikes via Cllr Hackett
67236 on 24/6/21
No █████ Addison road friar wednesbury riding up. And down road have rang police nothing sorted and constantly up. Down most night 15.16 years old white scooter moped been riding up and down sinc
67318 on 25/6/21
Friar Park - Large group of males riding an unregistered motor cycle around the estate and passengers not wearing helmets. Linked to incident 74290, █████ Addison rd, Police called - They will come and
67337 on 26/6/21
Friar Park- Witnessed 2 youths riding on a motorbike without a Helmet in Friar Park. This incident can be linked to a ongoing investigation by the Police in incidents 74290, and 74309. They have said
67338 on 26/6/21
Friar Park- Noticed a young ic1 Male riding a scooter carelessly and without a Helmet in Friar Park. This type of incident currently under investigation by the Police and they are asking for footage i
67368 on 26/6/21
Friar Park. Footage saved of an IC1 male riding a Red Scooter around outside █████ Addison Road. The police were notified. LJ
67599 on 9/7/21
Friar Park - Councilor reported quad bikes racing up and down Addison Road, Control called EPOs to attend, spoke to Steve Footage captured of youths with a motorbike and also youths riding an elec
67678 on 12/7/21
Bike comes from Bassett Rd just before Keir Rd mate.Ive saw the idiots riding round the Estate tonight mate,they am going to kill someone,the way they am riding
67727 on 18/7/21
Carisbrooke road park. Is now the only access to the canal. And we in Carisbrooke road are sick and tied of moterbikes in and around our streets. Sunday all day they was riding up and down the street
67730 on 17/7/21
Members Hotline report: 2 motorbikes seen on Carisbrooke Rd going onto the nearby canal
67731 on 16/7/21
Two motor bikes scramblers ridding around Friar park by Lidl stores basically all around the Friar park.
67736 on 17/7/21
Motor bikes outside pub
67737 on 17/7/21
Gathering of Youths on Motorbikes

67742 on 19/7/21
Morning I know you have an interest in the bikes racing up and down the field and around the estate well at 2:30ish this morning one of the idiots came blasting down Price Road and was going up and do
67744 on 19/7/21
Morning Simon, we have had the lad from number █ Addison Road going round on his bike from 2am, driving at speed. His bike is really loud and has kept us all awake, my partner has to be up at 5 for wo
67745 on 19/7/21
Last night at 2am we had 4 lads riding a very loud motorcycle up and down riverway as if in protest of the police action yesterday. What was the best number to call and report. This was targeted in my
67753 on 16/7/21
Friar Park-Footage saved of two motor bikes scramblers ridding around Friar Park for councillor Simon Hackett. EPOs called at the time (Nick) JF
67757 on 17/7/21
Friar Park - Noticed a group of young males with a motor cycle, believed to come from 19 School rd, took the bike to the field at the back of the park. They spent over an hour, taking it in turns
67766 on 19/7/21
Friar park 2 motorbikes seen speeding around the estate one was a scooter with reg no BL 70 OPU and the othe 1 was was unregistered scrambler bike. Police log no 521/19/7/21 JF
67788 on 19/7/21
From: Simon █ Sent: 19 July 2021 07:35To: Simon █ Subject: Hi Simon again racing up. Down masked on the bike hope catch him un ex
67789 on 19/7/21
From: Simon █ Sent: 19 July 2021 19:38To: Simon █ Subject: Simon we live on remembrance road a bike pulled up which absaltly scare
67790 on 19/7/21
From: austin █ Sent: 19 July 2021 04:52To: ASB Team <asb_team@sandwell.gov.uk> Subject: Re: IL2 Images sent - Addison Road(Claire wednesbury) this bike again was racing u
67792 on 19/7/21
From: Simon █ Sent: 19 July 2021 22:16To: Simon █ Subject: Hello Simon hope u don?t mind me messaging you because I really don?t wa
67796 on 20/7/21
Subject: Community Reporting Online Form - Off Road Bike WHEN 19th July at 3,30am WHAT were they doing? HOW were they causing a nuisance? Riding up and down road revving their bike WHERE? Be as specific a
67797 on 19/7/21

<p>WHEN? Date and time:18/19 July 2021 between 12am and 4amWHAT were they doing? HOW were they causing a nuisance?Riding up and down carrington road at high speed with windows open due to heat we was kep</p>
67800 on 16/7/21
<p>Subject: Community Reporting Online Form - Off Road BikeWHEN? Date and time: 16th and 17th July 2021. Between 12 midnight and 5amWHAT were they doing? HOW were they causing a nuisance? Constantly ridi</p>
67802 on 19/7/21
<p>Subject: Community Reporting Online Form - Off Road BikeWHEN? Date and time:

WHAT were they doing? HOW were they causing a nuisance?

WHERE? Be as specific as possible

</p>
67803 on 18/7/21
<p>Subject: Community Reporting Online Form - Off Road Bike18th July 12:00am-5:00am revVing engine and racing around friar park, motor bikes, quad bikes and young men driving and racing cars and they hav</p>
67806 on 19/7/21
<p>Subject: Community Reporting Online Form - Off Road BikeWHEN? Date and time:19.07.21WHAT were they doing? HOW were they causing a nuisance?up and down the furlong. Danger to allWHERE? Be as specific a</p>
67807 16/7/21
<p>Friday 16th July 3.00pm a off road motorcycle driving on the wrong side of the road in carrington road and left it until last minute to move to his side of the road and almost when into our car and th</p>
67808 on 19/7/21
<p>WHEN? Date and time: 19th-20th July 2021WHAT were they doing? HOW were they causing a nuisance? Riding and revving bikes and scooters before and after midnight up to the hours of at least 5am on the 2</p>
67809 on 19/7/21
<p>WHEN? Date and time:19.7.2021 01.00amWHAT were they doing? HOW were they causing a nuisance?Riding a noisy bike constantly up and down crankhall lane and surrounding areaWHERE? Be as specific as poss</p>
67810 on 19/7/21
<p>WHEN? Date and time:19/07/2021 2am - 5amWHAT were they doing? HOW were they causing a nuisance? Riding scrambler round the streets revving it whilst stationary. WHERE? Be as specific as possible asbur</p>
67811 on 19/7/21
<p>WHEN? Date and time:WHAT were they doing? HOW were they causing a nuisance?WHERE? Be as specific as possibleWHAT DOES THE BIKE LOOK LIKE? Colour markings? Registration?WHAT DOES THE RIDER LOOK LIKE? A</p>
67812 on 19/7/21
<p>WHEN? Date and time: 19th July 20 21 from 12.30 to around 2.30 am very 20 min or soWHAT were they doing? HOW were they causing a nuisance? Riding a very loud off road bike up and down the streetWHERE?</p>
67814 on 19/7/21
<p>Hi Simon sorry to bother u again but all night we have heard this motorbike 00.35 then again at 2.30 then 3.00 then again at 4.20,he as been at number 3 before, they all out already probs waiting for</p>

67815 on 19/7/21
WHEN? Date and time:19/07/2021 @3am -5amWHAT were they doing? HOW were they causing a nuisance? revving up motorbikes in the street as loud as they couldWHERE? Be as specific as possible carisbrooke r
67816 on 19/7/21
WHEN? Date and time: All the time during the last few weeks. Last night was horrendous. 1a.m until 4.30a.m.WHAT were they doing? HOW were they causing a nuisance? Riding a 4stroke pit bike recklessly
67817 on 19/7/21
WHEN? Date and time:19th July 3.30amWHAT were they doing? HOW were they causing riding around the estateWHERE? Be as specific as possible crankhall lane wednesbury WHAT DOES THE BIKE LOOK LIKE? Colour
67833 on 20/7/21
Call rec'd at 20.35 and EPO 22 & 18 arrived at 20:55Patrol conducted around Addison Road and adjacent streets but EPOs witnessed none of the reported mini motos reported were seenn.Police were also se
67834 on 19/7/21
WHEN? Date and time: Monday 19th July 2021 01:00 - 03:30amWHAT were they doing? HOW were they causing a nuisance? Speeding round the streets of Friar Park on a motorbike with a very loud engine throug
67835 on 19/7/21
WHEN? Date and time:19/07/21 7pmWHAT were they doing? HOW were they causing a nuisance? Riding up and down the road at speed causing nuisance WHERE? Manor road and crankhall lane WHAT DOES THE BIKE L
67836 on 19/7/21
WHEN? Date and time:Monday 19th July between 3am & 4am.WHAT were they doing? Riding a motorbike with very loud exhaust.How were they causing a nuisance? It was very loud and could be heard going aroun
67837 on 19/7/21
They are out again now bombing up and down. This is him outside 3 Addison Road. He has been bombing round all day. The reg number is NV15 NWC. This is a high powered motorbike. They have also been rid
67838 on 19/7/21 on 19/7/21
WHEN? Date and time: early hours Monday morning 19/07/2021 at approximately 1:00-2:30 amWHAT were they doing? HOW were they causing a nuisance?Reving an off road motorcycle, riding it up and down the
67839 on19/7/21
WHEN? Date and time: Monday 19th July 2021 01:00 - 03:30amWHAT were they doing? HOW were they causing a nuisance? Speeding round the streets of Friar Park on a motorbike with a very loud engine throug
67845 on 19/7/21
WHEN? Date and time: 19/7/21 from around 2:30 am on an off till around 4-5 am WHAT were they doing? HOW were they causing a nuisance?Racing up and down the street bibbing horns and being really loud w

67846 on 19/7/21
19th July. 20:00 onwards, it's a high spec fast motorbike. Red and black colour. The kids come out of number 3 Addison road, take turns on the bike, they are refilling the tank in front of the camera
67847 on 18/7/21
WHEN? Date and time: 18th July approx 11pm - 19th July approx 3am WHAT were they doing? HOW were they causing a nuisance? Revving the bike, constantly riding round. Very noisy, kept me and my little ch
67849
WHEN? Date and time: 19th July (early hours) WHAT were they doing? HOW were they causing a nuisance? Speeding up & down Friar park road. Revving the motorbike constantly. One scrambler & one moped. WHERE?
67850 on 19/7/21
WHEN? Date and time: 19/07/2021, 00:30am to 03:30am, WHAT were they doing? HOW were they causing a nuisance? Riding scramblers early in the morning. Sometimes you can also hear them handbraking the c
67851 on 19/7/21
WHEN? Date and time: 3.30-4.30am 19th July 2021 WHAT were they doing? HOW were they causing a nuisance? Riding up and down Asbury Road repeatedly, revving the bike, stalling it! At a ridiculous time. W
67852 on 19/7/21
WHEN? Date and time: 04:00 19/07/2021 WHAT were they doing? HOW were they causing a nuisance? Riding scrambler bikes over the speed limits extremely loudly WHERE? Be as specific as possible woden road e
67853 on 19/7/21
WHEN? Date and time: 19/7/21 between 2am and 4:30am WHAT were they doing? HOW were they causing a nuisance? Riding up and down the street, the scrambler bike was extremely noisy- the moped wasn't WHERE
67859 on 19/7/21
Call received via Taskforce. Simon Hackett reporting a nuisance bike at Addison Road. VRM captured on CCTV NV15 NWC
67860 on 20/7/21
WHEN? Date and time: 20th June 2021 WHAT were they doing? HOW were they causing a nuisance? Riding around again WHERE? Be as specific as possible Moor street, wednesday WHAT DOES THE BIKE LOOK LIKE? Colour
67861 on 20/7/21
Tuesday night same again 20:00 hours onwards. They pick up the lad from number 3 Addison Road and take turns on the bike.. Also speeding recklessly on the footpath on Addison Road. WHEN? Date and time
67862 on 20/7/21
WHAT were they doing? HOW were they causing a nuisance? Speeding up and down Carrington road WHERE? Be as specific as possible Carrington road wednesday ws10 WHAT DOES THE BIKE LOOK LIKE? Colour markings
67863 on 20/7/21

WHEN? Date and time: 20/07/2021 8.30pm ish onwardsWHAT were they doing? HOW were they causing a nuisance?Driving onto the Field. One was wheel spinning and causing smoke to to fill up around kid s pl
67864 on 20/7/21
WHEN? Date and time: 20/7/21WHAT were they doing? HOW were they causing a nuisance?Riding an off road around the estate.WHERE? Be as specific as possibleOxford street/Price road field Wednesbury and m
67865 on 20/7/21
WHEN? Date and time: 20/07/2021WHAT were they doing? Speeding and racing down carrington rd wednesbury HOW were they causing a nuisance?speeding on scrambler bikes and racing other cars WHERE?carringt
67875 on 21/7/21
CCTV Taskforce Report 18: Motorbikes on Addison Road - No EPO Response, camera's checked, Bikes had gone
67909 on 21/7/21
18:50 Wednesday 21st July. The motorbike is back at 3 Addison road right now. There?s lads in the house right now. They will be chopping and changing on the bike for most the night now! WHEN? Date and
67911 on 21/7/21
From: Ali Rex <ajr006@hotmail.com> Sent: 21 July 2021 20:05To: ASB Team <asb_team@sandwell.gov.uk>Subject: Community Reporting Online Form - Off Road BikeWHEN? Date and time: WHAT were they
67912 on 21/7/21
From: Ali Rex <ajr006@hotmail.com> Sent: 21 July 2021 19:47To: ASB Team <asb_team@sandwell.gov.uk>Subject: Community Reporting Online Form - Off Road BikeWHEN? Date and time: WHAT were they
67914 on 21/7/21
WHEN? Date and time: 21/7/2021 @ approx 19:30WHAT were they doing? HOW were they causing a nuisance? Riding up and down street, reviving engine with a total of 3 passengers on it. Took bike up alleywa
67915 on 22/7/21
WHEN? Date and time: 22/7/21 13.15WHAT were they doing? HOW were they causing a nuisance?Speeding up and down Elwell Street and around Meaty Croft, terrifying kids that are innocently playing and dist
67916 on 22/7/21
WHEN? Date and time: 22/07/21. 15:01WHAT were they doing? Riding wrong side of the road, no reg plate and crossed onto public grassed area . Very loud noise and not where they should be HOW were they
67968 on 25/7/21
Cllr called to advise of off road bikes around Kilvert Road and Moore Street. Epo's attended and spoke to one rider.
67969 on 25/7/21
Cllr called to advise of off road bikes around Kilvert Road and Moore Street. Epo's attended and sighted bikes but could not catch up to them due to high speed.
68221 on 25/7/21

From: Simon [REDACTED] > Sent: 25 July 2021 17:06To: Simon [REDACTED] Subject: Hi both I?m not sure which area this comes under I was at the traffic is
68245 on 6/8/21
Off Road bike form
68371 on 12/8/21
Friar Park - School rd, Two males seen riding around the estate on a blue motor cycle with no helmets. Couldn't track where they came from. For information. AA
68379 on 13/8/21
Motorbikes riding around Remembrance Road
68383 on 15/8/21
Off road motorbikes on the green space. This is an ongoing problem.
68428 on 17/8/21
Joint ASB Team/Police visits due to intelligence of off-road bikes at properties
68429 on 17/8/21
Joint visit completed with the ASB Team due to off road bike intelligence gained by the police
68430 on 17/8/21
Joint Police visit with ASB team due to police intelligence of off road bike at the address
68431 on 17/8/21
Police joint visit with ASB Team following off road bike intelligence
68432 on 17/8/21
Joint visit completed with police and ASB Team due to off road bike intelligence relating to the property.
68446 on 10/8/21
And he's just come back again, green white and black angular helmet, blue shortsSent via BT Email AppFrom: PAT ARCHERSent: Aug 10, 2021 at 5:29 PMTo: PAT ARCHER , asb_team@sandwell.gov.ukSubject: Re:C
68629 on 26/8/21
Friar Park. Footage saved of two people riding on a motorcycle illegally on Friar Park Road with no helmets. Bike appears to be purple in colour being ridden by someone in a dark top or jacket. Pillion
68673 on 29/8/21
Friar Park at Carisbrooke Road i saw a male riding a motorbike without a helmet. all footage saved of bike and youths congregating with him. JF
68758 on 5/9/21
5/09/21 - Call to duty line to report off road bikes round Carisbrooke Road and Manor Junction. No reg on the bikes
68759 on 5/9/21
Call on 5/9/21 at 19.40pm to duty line to report off road bikes around Addison Road
68803 on 5/9/21

Friar Park - Received a call from Simon Hackett from Friar Park to say that locals had informed him that 2 youths were racing up and down Addison Road and riding without due care. I checked back on th
69430 on 23/9/21
ASB complaint about the tenants at number 87 Carisbrooke Road. The tenants are going around on off road motor bikes shouting up and down the street with no helmets on riding on the back wheel.
69573 on 24/10/21
Call to Duty Line 24/10/21 at 13.10pm Report of motorbikes on Friar Park Road
69574 on 24/10/21
Call to duty line 24/10/21 at 15.40pm Reports of motorbikes and quad bikes on Friar Park Road
69632 on 24/10/21
Friar Park - Received a call from Councillor Simon Hackett in regards to Motorbikes in Friar Park. I checked the CCTV and counted at least 29 Bikes going down Friar Park Road. Councillor Hackett did
69715 on 31/10/21
just let you now those moter bikes are starting back up again theres 4 going up down tonite ain't been able take pictures as they to fast catch them on fone plus been dark nights. We need some pol
69743 on 31/10/21
2 Off road bikes were seen outside 1 Carisbrooke Crescent Friar Park, Wednesbury and made off on spotting officers. One of the neighbours from up the road was out and when asked if he knows where they
69745 on 31/10/21
Latest intelligence I had in confidence on the off road bike from Friday evening: Evening Simon two off road bikes on the pylon petrol station 10 minutes ago buying fuel, they have cctv on there so mig
69761 on 31/10/21
all day and night yesterday (Sunday) motor bikes around woods park hill friar park drove us saft 6 of them I know 2 of um bran Lyode the lad I told you about parking is jeep on grass verg essex Avenue
69880 on 3/11/21
Councillor Enquiry FS-Case-375938509: Anonoymus Complaint: Had this in confidence: Hi simon all day and night yesterday (Sunday) motor bikes around woods park hill friar park drove us saft 6 of them I
69989 on 17/11/21
The motor bike incidents have been happening over the last year. Not sure if just one bike but been various bikes, sometimes off road with helmet, sometimes not. Noise and dangerous speeds. Mr Smith h
70022 on 17/11/21
Friar Park - Monitoring three youths on motorbikes in Bassett rd. Three youths on motorbikes leave the estate on camera 281. Incident reported to Supervisor by Councillor Hacket. AA
70222 on 17/11/21

Friar Park - 2 Youths seen on CCTV riding a motor bike dangerously with 'L' plates on They were at the junction of School Road and Carrington Road CCTV managed to get number plate BK65 GYS with r
70223
Friar Park - 2 males seen on CCTV riding dirt/Off Road bikes, with no number plates or helmets around Friar Park doing wheelies, 1 bike was reddish in colour and the other was a lime green On male
70298 on 5/12/21
Housing Services > Anti-Social BehaviourASB WednesburyWants to discuss anti-social behaviour in area in confidence - speeding, drugs and off road bikes. [Mr Wood dennis_1962@hotmail.co.uk 07717174481
70404 on 12/12/21
Hi if check 19.18.on camera will. See. Moter bikes out side num 3 racing video won't send if check street one should show
70405 on 15/12/21
Had bikes up and down again so we thought we ring the police they said can't come out as they very busy and did we have any number plate on it they didn't want to now the police didn't ... So for
70602 on 27/12/21
27th December 16 . 15 pm tame avenue wednesbury field at the back of tame avenue WHEN? Date and time:WHAT were they doing? HOW were they causing a nuisance?Riding noisy scrambler bike with a gang of
70603 on 27/12/21
WHEN? Date and time:27th dec 2021WHAT were they doing? HOW were they causing a nuisance?4x4s and motor bikes causing damageWHERE? Be as specific as possibleMill pool nature reserve hateley heathWHAT D
71252 on 2/2/22
Friarpark (Cam 291 & 285) - Male captured littering a can and riding a dirtbike with no reg or protective gear. Bernard escalated to epo. Male is now seen on Friar Park rallying on the field. AA
71253 on 2/2/22
Friarpark (Cam 285) - Male captured rallying down residential street on a dirt bike with no registration. AA
71276 on 5/2/22
Report of off road bikes on Bassett Road
71279 on 4/1/22
Had this in confidence this afternoon:Hi Simon just this minute heard motorbike up alleyway behind number 11 and 13 plz keep anonymous - coming from 3 Addison Road
71280 on 7/2/22
Hi sorry to bother you, I live across the road from the field on Pemberton crescent, is there anything you can do about the bikes going over there,there are still there and some days later, they are w
71281 on 19/1/22
Hello Simon, I live on sandy Lane, the end of friar Park Rd, have just had the bikers on the field again, on a Sunday we have loads, they even stop the traffic on Walsall road n go over on the red lig

71282 on 20/1/22
Had below in confidence:Hi Simon. For the past week now there have been lads riding very loud motorbikes (off road type ones) up and down Dorsett, School and Carrington roads, sometimes late at night
71283 on 23/1/22
WHEN? Date and time:Sunday 23 jan at 11.30amWHAT were they doing? HOW were they causing a nuisance? Riding an off-road motorcycle at speed across all of Newtown fields Wednesbury . Very fast and very
71284 on 1/2/22
I had this report tonight of off road bikes:On the playing field behind the millennium centre around started about half 4 for over an hour. Same bike and people that have been over there for the last
71285 on 3/2/22
I had this report tonight of off road bikes:On the playing field behind the millennium centre around started about half 4 for over an hour. Same bike and people that have been over there for the last
71286 on 3/2/22
Alright mate....theirs 9 motorbikes goun up and down Kent road bottom of Durham roads (end of Durham Road) - this was 5.30 / 5.45 this evening.
71314 on 7/2/22
Full details :I had this report tonight of off road bikes:On the playing field behind the millennium centre around started about half 4 for over an hour. Same bike and people that have been over there
71343 on 9/2/22
Reports of off road bike on Crankhall Lane, doing a wheelie in the middle of the road
71347 on 10/2/22
Nuisance Motorbike Report, recieved via Ckllr Hackett FS-Case-400015573
71348 on 9/2/22
Can you contact resident in his capacity as lead for Cycling UK. He has evidence and info regarding off road bikes [George Reeves georgereevescyclinguk@gmail.com 07388463269 182 Crankhall Lane, Wedne
71359 on 9/2/22
Hi Simon. We need to do something about the motorbikes on the field at the back of Richard Williams road. My daughter was walking home across the field today and has badly sprained her ankle going dow
71360 on 10/2/22
Latest message on Facebook on where off road bikes are going. The walkway from red house avenue up to pound Road is another one . So dangerous if sowm was was walking down as they bomb up !!!
71417 on 11/2/22
Crankhall lane - motor bike seen being driven dangerously EPOs did not attend

72214 on 21/3/22
Report of off road bikes on Hydes Road
72234 on 22/3/22
Motorbikes being driven eratically and dangerously in Crankhall Lane, Wednesbury

West Bromwich
59636 on 23/6/20
Ongoing situation with people racing up and down Kenrick Way adjacent to Glover Street. Police attend to disperse but then they come back again. This has been ongoing for 9-10 weeks but most recently
59702 on 26/6/20
Car gathering around 100 people in attendance on the old vauxhall garage started around 9.30pm loud music, shouting, laughing , screaming, racing cars up and down spon lane and around Dawes avenue est
60153 on 16/7/20
Boy racers turned up to try out the new road surface the council have just laid !!
60253 on 18/7/20
Every/ every other Friday and/or Saturday, at times ranging from 23:00-01:00 a massive car cruising and speeding is taking place. This has been happening for the past 2 months. Several times I have wi
60254 on 18/7/20
WE had boy racers YET AGAIN !! They are now bringing FIREWORKS !!
60277 on 20/7/20
From: Mark Campbell <m.campbell@west-midlands.pnn.police.uk> Sent: 20 July 2020 07:39To: Pardip Sandhu <Pardip_Sandhu@sandwell.gov.uk>Cc: Joanne.Mason@wolverhamptonhomes.org.ukSubject: Arrset for brea
60476 on 28/7/20
WHEN? Date and time:Most days mainly weekend and eveningWHAT were they doing? HOW were they causing a nuisance?General racing around. Excessive noise for long periods. Excessive speeding a danger to p
60684 on 1/8/20
Kenrick House, No80 reported boy racers going up and down Kenrick Way. Got the Registration of some of the cars Ford EK10 KZL BMW E373 FAN Volks Wagen RX06 UMB Rang the police twice to report the in
60694 on 2/8/20

Kenrick House - Tenant from flat 80 called to report boy racers on Kenrick way. Car reg of some spectators. BF55 HAA KT14 EVJ Called police but no answer. PASSED FOR ACTION. AA.
60811 on 7/8/20
Kenrick House- Tenant at flat 80 reported several cars parked on the car park outside the block and drivers racing along Kenrick Way. Dialled 101 and tried to report the matter to the Police for long
60828 on 8/8/20
Kenrick way. People congregating watching vehicles racing and speeding. Registrations captured. PASSED FOR ACTION JF
60991 on 14/8/20
Kenrick Way- Observed car cruisers/racing on Kenrick Way. Footage has some facial images and number plates. PASSED FOR INFORMATION- Logged with the police. Log no 5281 of 14/08/20. LJ
61146 on 23/8/20
Kenrick House, No80 reported boy racers on Kenrick Way. Registrations of a couple of cars TSH UTS colour white TBO MML colour grey PASSED FOR ACTION JF
61221 on 28/8/20
Kenrick hse - Had a call from the tenant in flat 80, saying that the boy racers are back on the roads, a lot of people just standing watching on both sides of the road. PASSED FOR ACTION. AA.
61231 on 30/8/21
Kenrick House - tenant from flat 80 call to report boy racers are back. RESOLVED. AA.
61255 on 1/9/201
Kenrick Hse-Flat 80 called to report racers lining up on Kenrick way. Called police via 101. Log no 82/01.09.2020. PASSED FOR INFORMATION. LJ
61932 on 7/10/20
Information received from PC 22506 BROMWICH West Bromwich NPT Concrete blocks have been placed on Walsall Road just past Tame Bridge Parkway to stop the 4 x 4 access. Vehicles have now forged a new path
62734 on 12/11/20
Report of nuisance motorbikes on Greets Green Plating Fields. See emails attached to notes.
63599 on 14/12/20
Kenrick House a tenant flat no.80 he called and complained about the boy racers Cars on the dual carriageway making a lot of noise. i called 101 and report. LOG NO.5858/14/12/20. all footage saved.
63834 on 25/12/20
On Christmas Day at around 10:25am, there were 3 children on dirt bikes driving around the park. There was around 10 people with two pushchairs on the park which I am assuming were family members. Oth
63835 on 26/12/20

I reported to the police on Boxing Day at around 14:12, 5 dirt bikes and 1 quad bike. The quad bike and 2 of the dirt bikes were being driven by children. The other 3 dirt bikes were being driven by t
63836 on 27/12/2-
At around 15:12 today, there were 3 dirt bikes on Greets Green Park on the field opposite Living Well Street. 1 dirt bike was being driven by a child and the other 2 were being driven by teenagers/adu
64218 on 17/1/21
Regular incident of scrambler bikes racing in streets, along fields side of estate, on pavements and down gullies. No number plates on bikes.
64238 on 17/1/21
I'm a resident of Charlemont with Grove Vale ward and over the past few years we have seen and heard off road motorbikes using certain pedestrian walkways. Like me the local residents have had enough o
64502 on 31/1/21
Police COVID Log 1286 31st Jan 2020: Edelweiss Close Yew Tree, off road bikes reported in area, 4 x DTL?s issued, more ASB than covid, will email officers if they still have details of riders.
65386 on 17/3/21
I have just reported the bikes to 101 again via live chat. They've been here for the past 2 hours and if you're trying to work from home, you can forget it thanks to the noise. They're also doing whee
65975 on 13/4/21
Every evening car fulls of lads park up, all i can smell is cannabis. It seems to be a new meet up area for the boy racers, they park opposite the flats with full beam onto the flats, i have to close
66449 on 16/5/21
Walkways are being ruined by the Bustlehome estate not far from Stanhurst way, close to River Tame. They are being ruined by Quad bikes, riding up & down in the day.
66883 on 8/6/21
The resident of Whitgreave st was in the street drinking alcohol. Someone from the address was riding a motorcycle doing doughnuts in the middle of the street, then riding up the street doing wheeli
66935 on 12/6/21
4 motorbike outside revving up and making lots of noise and including 3 of Andys friends and there is a child in the cul de sac
67138 on 8/6/21
MP340401769 refers to Nuisance Motorbikes on open space between the Tame Bridge Parkway station and the Yew Tree Estate. Recorded for intel purposes. Full response on MP340401769 (Draft ASB Team Resp
67666 on 14/7/21
Every night at around 11pm I can hear people racing cars and motorbikes on the expressway and the roads leading towards the Albion ground. It lasts for over an hour. Even with the windows shut, I can
67829 on 28/6/21

Councillor enquiry - FS-Case-350884653:Mr Proud reports constant excess speeding on the estate in spite of it being a 20 MPH max-speed areaHe has reported this problem previously, Ref. CU345432307 and
68961 on 13/9/21
EVERY NIGHT cars are racing across Bowstoke Road into Tanhouse Avenue, they have got to be hitting speeds in excess of 60mph (in a 20mph zone). You can hear them coming as they must be equipped with l
69936 on 14/11/21
6 motorbikes riding along the footpath along side Q3 school heading towards the canal and Yew Tree Estate.The restrictor on the path has been removed again,having been replaced about 6 weeks ago.A mor
70162
MP Enquiry Ref MP381920683:From: Nicola Richards MP <Nicola.Richards.mp@parliament.uk> Sent: 26 November 2021 15:10To: Customer Feedback <Customer_Feedback@sandwell.gov.uk>; westbromtown@west-midlands
71004 on 24/1/22
Good Afternoon, I hope this finds you well. I am writing on behalf of Dean Wakelam of 2 Broom Road, Walsall, WS5 4AF. He has raised concerns about off-road bikes in his area which he believes is relat
71006 on 24/1/22
Good Afternoon, I hope this finds you well. I am writing on behalf of Chris Parker of 305 Beaconview Road, West Bromwich, B71 3PS. He has raised concerns about off-road bikes in his area which he beli
71175 on 1/2/22
The complaints about 'motor bikes' are very much on the increase. Over the weekend a number of complaints about the noise these bikes/motor bikes make: 3 separate residents on Angus Close spoke a moto
71237 on 4/2/22
MP398269523. Good Afternoon, I hope this finds you well. I am writing on behalf of Pat Hayfield of 36 Andrew Road, West Bromwich, B71 3QP. She has raised concerns regarding off-road bikes on the canal
71914 on 7/3/22
cars speeding up and down walsall road
71891 on 7/3/22
Resident has made a complaint on behalf of a group of residents of Walsall Road regarding ASB of three tenants of Sandfield House, Walsall road. The tenants in question are racing along the dual carriageway and in car park in their vehicles late at night and early hours of the morning. The engines are very noisy and disturbing other residents. They have put up with this ASB for several months and are requesting that the council take action against these tenants. Resident can provide vehicle registration numbers if required.
72090 on 17/3/22
motorbike issues in and around Ray Hall Lane and the water treatment works managed by Severn Trent.
72230 on 23/3/22
whilst on a home visit the tenant stated that there are cars raising up and down walsall road, day and night.

advised the importance of reporting to police and or council

72231 on 23/3/22

off road bike situation and i was wondering what the Council was doing to resolve this matter , i have been onto the Police and do not get anything really resolved, this is a blight on our estate and other estates that needs a resolution quickly to resolve, take into account this Sunday there was numerous off road bikes zooming up and down Orchard Road pulling wheelies and going at high speed and it is only a matter of time before someone gets killed.

Also i asking about the estate in general looking very unkempt so to speak, the Estate footpaths and grass verges are in a right old state and the council do not seem to want to do anything to sort, understand it costs money but in all honesty i feel the estate is being totally forgotten about by the council and needs some action to repair the pathways and grass verges and also to stop people parking on the verges and blocking footpaths, also every time i go passed a general rubbish bin everything is always overflowing and rubbish left everywhere.

Last thing reference the council owned garages in which i rent one of them, why have the council decided to put the rent up on these garages based on the current situation with general increases in energy, council tax and general living allowances are Sandwell council trying to push people away from renting these garages and then they go to rack and ruin??? don't understand why they needed to put the rent up.

Look forward to your response.

72239 on 24/3/22

Every Sunday between 2pm-5pm there are motorbikes and quadbikes over on the field at the back of her property. This Sunday she counted over 60 motorbike/quad bikes.

Mrs Pritchard said there were children playing on the park at the time and a little girl was screaming and crying when they all arrived as she was petrified.

She is fearful someone is going to be killed as they drive fast, on one wheel up and down the field and not all of them are wearing helmets.

72323 on 26/3/22

CW Log 1849 of 26/03/22

Non ASB Crime number 20/330520/22

INTELLIGENCE FROM POLICE REGARDING RESIDENT COMPLAINT ABOUT:

ONGOING ISSUES WITH MOTORBIKES, THIS IS CONSTANTLY HAPPENING MOST DAYS AND THEY TEND TO TURN UP IN THE AFTERNOON. NO CONFIRMED VRMS HOWEVER OCCURS MOST DAYS AT THE LAND OF CHAPEL FARM AND SUTTON LANE

72394 on 31/3/22

This Email is being sent to you and everyone on the list, to make sure you are aware of the nightmare the residents in Tamebridge are being made to live in!

Every Sunday with guarantee and throughout the week we endure ASB of dirt bikes, scooters, quad bikes, scrabblers even the odd off road car in numbers of 20 plus, up and down the public path running alongside the back garden of the homes and the national grid. They ride under the M6 and along the river. the ground has all but been destroyed. They come off the back track and onto the road doing wheelies and weaving in and out of the cars. The abuse from them is unreal and damage to property is on par.

This situation needs to stop! At one point ONE CCTV camera was put up and within 3days was gone. The entrances to the public path have motorbike barriers but you can just walk around them, the space could fit a car!

The road entry to the public path also belongs to the national grid; the gate there has been pulled open and bent apart.

SOMETHING NEEDS TO BE DONE!

It is affecting the life of the residents and wildlife of the area. a petition is in draft and will be gathering signatures

I wish to add that this really is the final push. the amount of times 111 has been contacted the amount of times a video, pictures, talking to them, asking them, has happened and nothing has/is done. It is only a matter of time before someone is hurt! whether is a walking person or the idiots on the bikes. Whose fault will the blame land on? I know it will not be the silly boys on the motorbikes or the people having a walk.

1) Claimants
2) P Sandhu
3) First
4) PS1 – PS2
5) 27th September
2022

IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN ENGAGING IN DANGEROUS DRIVING AND
ASSOCIATED ACTIVITIES

Defendants

EXHIBIT PS2

The document referred to as “**Exhibit PS2**” in the witness statement of Pardip Sandhu dated 27 September 2022 is video footage captured on 19 September 2022 which is available separately.

Claimants
Steven Gittins
First Witness Statement
Exhibits SJG1-SJG3
08 September 2022

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

CLAIM NO.

BETWEEN:

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

Claimants

-and-

**PERSONS UNKNOWN ENGAGING IN DANGEROUS DRIVING AND
ASSOCIATED ACTIVITIES**

Respondents

WITNESS STATEMENT OF STEVEN GITTINS

I, STEVEN JOHN GITTINS, Team Leader Community Protection, Walsall Metropolitan Borough Council, Civic Centre, Darwall Street, Walsall, WS1 1TP ("the Council") WILL SAY AS FOLLOWS:

1. This statement relates to the Black Country boroughs' application for an injunction prohibiting people from engaging in car cruising. An injunction was initially granted from 1 February 2014 to 1 February 2018, and subsequently extended until it lapsed on 1 February 2021. I provided evidence in support of the application for that injunction.
2. There have to date been no applications for committals for breaches of the above injunction in the Borough of Walsall.

3. The problems associated with car cruising related activity within the borough, judging from reports to both the police and the council, were significantly reduced after the injunction came into effect. The Council does receive a small number of complaints about cars racing and related activity, but these are limited and do not identify a clear pattern of car cruising and associated anti-social behaviour, or a significant increase in this activity.
4. I have very recently spoken to a number of community members who have been directly impacted by the effects of car cruising and who reside in, or close to, hot spots for this type of activity. These include the Moxley/Darlaston areas, which are adjacent to or which are not far from the Black Country Route, and the Brickyard Road/Northgate areas of Aldridge. One local resident whose house backs onto the Black Country Route said that once the word had been spread that car cruising was prohibited by an injunction that activity finally stopped. Unfortunately, his current experience is that he can once again hear cars racing behind his house. He fears that once the word gets about that the injunction has expired it will only be a matter of time before matters return to what they were. He reminded me that his previous experience would be of 30 plus vehicles racing up and down from 8pm until 2am or 3am. The noise kept him awake and prevented him from sleeping. This had a serious detrimental effect on his life. He described it as making his life intolerable. I now produce as exhibit **SJG1** an updated email from Mr Hudson sent on 11 May 2022 in which he outlines his views and concerns.
5. Business owners whose premises are in Brickyard Lane, Aldridge confirmed that car cruising activity reduced dramatically following the injunction coming into force. However there are some signs that this activity is starting to increase again in that area. In December 2021 palisade fencing at their premises was damaged in what appeared to be a vehicle collision. Although there is no concrete evidence, they believe this to be the result of speeding vehicles. Whilst the litter and debris previously associated with this activity is still much lower than was the case pre injunction, they are concerned the activity has again started to take place at this location. They are very supportive of the

injunction being re-instated and are concerned that the dangerous activity will return if this is not the case.

6. A resident who resides in Aldridge, previously reported that prior to the injunction being in place he could regularly hear vehicles racing between two islands on Northgate, Aldridge. On one occasion he was nearly hit by one of the speeding vehicles coming out of a junction and wheel spinning in front of him. He reported in excess of 20 cars preparing to race each other and witnessed a large group of youths congregating in the street around a bonfire they had lit on a grass verge. After the injunction was granted he felt much safer and for a long period was not aware of any issues. More recently, however, this situation has started to deteriorate. Recently he reported that at weekends and after 10pm, powerful vehicles can be heard racing around the centre of Aldridge and along Northgate. This continues throughout the night. Also, earlier in the evenings, when out walking his dog he regularly sees cars clearly exceeding the speed limit, racing each other and dangerously overtaking along Northgate. He specifically identifies the junction of Walsall Wood Road and Northgate, where several times in the past year speeding cars have left the road and hit a lamp post or street sign. He is of the opinion that it is only a matter of time before this behaviour results in a fatality. I produce marked **SJG2** an email from a local resident setting out these concerns.
7. The Locality Manager who up until recently covered the Brownhills area confirms that, since the injunction has been in place, there has been very little reported in the way of car cruising activity and he is unaware of any hot spots for this type of anti-social behaviour.
8. Councillor Paul Bott, a Ward Member for Darlaston South, which includes the Moxley area, reported that previously every weekend was a nightmare as a result of car cruising activity on the Black Country Route and surrounding areas. Furthermore, that due to the success of the injunction, he has received no complaints for three years. I now produce as exhibit **SJG3** the emails from Councillor Paul Bott on 7 April 2021 and 13 May 2022 in which he confirms the points he made to me by phone.


9. Local police have said that they do not currently see a significant impact due to car cruising across the borough. They do, however, confirm that there are areas of concern, primarily Moxley, Darlaston and the Black Country Route and areas in Aldridge, including Queslett Road.
10. Although the number and frequency of car cruising related incidents in Walsall has considerably reduced, there are still areas of concern. There are areas, particularly on and around the Black Country Route which runs between the Moxley, Darlaston and Willenhall areas, in which there has been a recent worrying increase in car cruising and related activity. Areas in Aldridge, including Brickyard Lane and the Aldridge Industrial Estate are also areas that have again begun to suffer from this type of anti-social behaviour. The Bescot Retail Park is also an area at which Street Racing type behaviour has been reported. Between 01/01/22 - 04/09/22 police have received 57 reports for Walsall relating to vehicles being used in an anti-social manner.
11. Whilst there are still some problems reported within Walsall, it remains the case that the injunction has had, and continues to have, a positive deterrent effect in Walsall on car cruising related activity and the anti-social behaviour associated with it. This may be in part because road-side signs notifying people of the injunction were erected. Motorists were thereby warned of the consequences of engaging in car cruising. When the injunction expired, covers were ordered to be placed over the signs. It would appear that the covers did not arrive and thus the signs remained on display. There is a real concern that, if the injunction is not in place, incidents of this dangerous activity will increase, and if Walsall were not included in any new Order, that activity would be displaced into the borough from its neighbouring authorities. This is of particular concern because of the level of car cruising which took place before the injunction was granted, and because there are various places which were found to be particularly suitable for people to congregate, to engage in high speed driving, and even a form of drag racing.

12. The original injunction was sought and granted because of the very high level of nuisance which car cruising caused to the inhabitants of the borough who lived near the favoured venues, and because of the risks of serious injury and of death which might be caused by the dangerous and furious driving adopted by people engaging in these activities. The resident referred to in paragraph 6 above is not the only person who has come within a whisker of being hit by a speeding vehicle. There are obvious dangers posed to both pedestrians and motorists. Car cruising is dangerous both to those voluntarily attending the event and to other road users. I understand that in other boroughs a number of people who were mere spectators were very seriously injured in collisions, and there have even been a few deaths caused by these activities. I believe the grant of the previous injunction has had a very beneficial effect in reducing the level of anti-social behaviour caused by these meetings, and has prevented a number of accidents which would otherwise have caused serious injuries or death. The Council, in seeking this injunction, has in mind the need to protect the lives of the inhabitants of the borough, and the need to protect people from unnecessary serious injury or death.

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

8th September
2022

Print name in full STEVEN JOHN GITTINS

Claimant
Steven Gittins
First Witness Statement
Exhibits SGJ1-SJG3
08 September 2022

IN THE HIGH COURT OF JUSTICE

CLAIM NO.
QUEEN'S 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

Claimants
Steven Gittins
First Witness Statement
Exhibits SJG1-SJG3
08 September 2022

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

CLAIM NO.

BETWEEN:

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

Claimants

-and-

**PERSONS UNKNOWN ENGAGING IN DANGEROUS DRIVING AND ASSOCIATED
ACTIVITIES**

Respondents

EXHIBIT SJG1

This is the document referred to as "**EXHIBIT SJG1**" in the witness statement of Steven Gittins dated 08 September 2022.

Adam Sheen

From: David Hudson <[REDACTED]>
Sent: 11 May 2022 18:15
To: Steve Gittins
Subject: Car Cruising

CAUTION: STOP and THINK - This email originated from outside of the council. If it looks suspicious it probably is and you should NEVER enter your council username and password into an external link or open attachments.

Hi Steve,

Information as requested.

Before the injunction was in place the noise levels were incredible as the black country road runs directly behind our house, at one point there could be up to 30 plus vehicles racing up and down from the hours of 8 pm to nearly 2 am or 3 am in the morning, the noise would keep me awake and the anger would build as every weekend and sometimes in the week approached, having to be in work at 4 am in the morning and lack of sleep really told on my work performance, I attended the Police neighbourhood watch to combat this nuisance which was destroying our lives and our health with the stress which other districts were also experiencing. When the injunction was in place things started to calm down but not instantly as the racers would continue to race up and down until the word finally spread and it stopped. The present situation is we hear the cars starting to race behind our house in Moxley once again, we fear without this injunction in place it will only be a matter of time before it will be at its worst as in previous years and will take a long time to reinstate, we feel strongly that the court has got this wrong again and need to evaluate this situation before it destroys people's lives once again. These last 12 months have been much quieter I would not say totally clear of the cruising but much better my only concern is when or if the word spreads that there is no injunction in place it could return to how it was and that was intolerable.

If I can be of any further assistance please get in touch
I hope this statement is satisfactory

Kind Regards

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

CLAIM NO.

BETWEEN:

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

Claimants

-and-

**PERSONS UNKNOWN ENGAGING IN DANGEROUS DRIVING AND ASSOCIATED
ACTIVITIES**

Respondents

EXHIBIT SJG2

This is the document referred to as "**EXHIBIT SJG2**" in the witness statement of Steven Gittins dated 08 September 2022.

Adam Sheen

From: Wendy Parsons <[REDACTED]>
Sent: 11 May 2022 19:49
To: Steve Gittins
Subject: Information to support car cruising

CAUTION: STOP and THINK - This email originated from outside of the council. If it looks suspicious it probably is and you should NEVER enter your council username and password into an external link or open attachments.

Hi Steve

As discussed today 11/05/22 here is my statement of the situation At the moment at weekends anytime after 10pm and throughout the night you can hear what sounds like powerful cars racing round the centre of Aldridge and along Northgate.

Also earlier in the evenings whilst we are walking our dog we regularly see cars clearly racing each other and dangerously overtaking often at what seems to be twice the set speed limit along Northgate. An example of this behaviour is at the junction of Walsall Wood Road and Northgate on the bend of the junction During last year there have been several occasions where cars have left the road and 1 hit a lamp post and 3 times the street sign " Walsall wood road " has been flattened resulting in now it has not been replaced there. Is it our opinion it is only a matter of time before this could end in a fatality.

Kind Regards
Roger Parsons

Sent from my iPhone

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

CLAIM NO.

BETWEEN:

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

Claimants

-and-

**PERSONS UNKNOWN ENGAGING IN DANGEROUS DRIVING AND ASSOCIATED
ACTIVITIES**

Respondents

EXHIBIT SJG3

This is the document referred to as "**EXHIBIT SJG3**" in the witness statement of Steven Gittins dated 08 September 2022.

Adam Sheen

From: Councillor Bott P <Cllr.Paul.Bott@walsall.gov.uk>
Sent: 13 May 2022 09:06
To: Steve Gittins
Subject: Re: Evidence to support a further car cruising injunction application.

Hi Steve,
There has been no issues with car cruisers, the injunction was a great success.

Regards

Cllr.paul.bott
Darlaston South Ward

From: Steve Gittins <Steve.Gittins@walsall.gov.uk>
Sent: Thursday, May 12, 2022 5:23:49 PM
To: Councillor Bott P <Cllr.Paul.Bott@walsall.gov.uk>
Subject: RE: Evidence to support a further car cruising injunction application.

Good evening Councillor,

This is the e mail you kindly sent last year. If you could update and return to me as discussed please that would be great.

Thank you for your help with this and have a good evening.

Steve Gittins
Community Protection Team Leader
Regulatory Services
Zone 2G
Civic Centre
Walsall
WS1 1TP

Tel 01922 654297
Mob 07793 187857

From: Councillor Bott P <Cllr.Paul.Bott@walsall.gov.uk>
Sent: 07 April 2021 18:09
To: Steve Gittins <Steve.Gittins@walsall.gov.uk>
Subject: Re: Evidence to support a further car cruising injunction application.

Hi Steve
To whom it might concern. Every weekend was a nightmare on the black country route and the surrounding areas. PC Ian probert who was the local PC at the time asked myself and my wife Cllr Chris Bott to support the injunction which we did. This has been a success, there has been no complaints or problems over the past two years.

Councillor Paul Bott

Darlaston South Ward
Tel Home 01922 473091
Mobile 07731957520

From: Steve Gittins <Steve.Gittins@walsall.gov.uk>
Sent: Wednesday, April 7, 2021 5:40:17 PM
To: Councillor Bott P <Cllr.Paul.Bott@walsall.gov.uk>
Subject: Evidence to support a further car cruising injunction application.

Hi Councillor,

Thank you for taking the time to speak to me today.

As discussed would you be able to send me an e mail outlining your views on how successful, or not the car cruising injunction has been, the problems that have historically been experienced, the current situation and any concerns you may have about the fact that it is no longer in place.

We are currently working with other Black Country local authorities on a new submission and are gathering evidence in support of the application.

I need to turn this round quite quickly and need to pull everything together by 14th April, as such I would be grateful for a speedy response.

Thank you for your help with this and have a good evening.

Steve Gittins
Community Protection Team Leader
Regulatory Services
Zone 2G
Civic Centre
Walsall
WS1 1TP

Tel 01922 654297
Mob 07793 187857

i) Statement of: Sgt. Lee Plant
ii) Statement No: 1
iii) For: Claimants
iv) Dated: July 2022
v) Exhibits: LP1

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN ENGAGING IN DANGEROUS DRIVING AND
ASSOCIATED ACTIVITIES

Defendants

WITNESS STATEMENT OF LEE PLANT

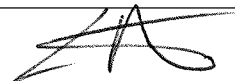
I, LEE PLANT, Sergeant 2882 of West Midlands Police, currently stationed at Bilston Police Station, Wolverhampton, WILL SAY AS FOLLOWS:

1. I make this statement with reference to my statement of 15 June 2022 exhibited hereto marked as "Exhibit LP1".
2. I note that the statement at **Exhibit LP1**, was produced in a format which complies with the requirements of section 9 Magistrates' Court Act 1980, the Criminal Procedure Rules and related legislation. I confirm that this statement was, and remains at the time of writing, informed, accurate and true to the best of my knowledge and belief.

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

15th July 2022

Print name in full PS 2882 LEE PLANT

i) Statement of: Sgt. Lee Plant
ii) Statement No: 1
iii) For: Claimants
iv) Dated: July 2022
v) Exhibits: LP1

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

**PERSONS UNKNOWN ENGAGING IN DANGEROUS DRIVING AND
ASSOCIATED ACTIVITIES**

Defendants

EXHIBIT LP1

This is the document referred to as "**Exhibit LP1**" in the Witness Statement of Sergeant Lee Plant of West Midlands Police dated July 2022.

WITNESS STATEMENT**Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B****Crime No.****URN**Statement of **Lee Plant**Age if under 18 ☐ 18 (if over 18 insert "over 18")Occupation **Police Sergeant**

This statement (consisting of 20 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.

Signature: L Plant (witness)**Date 15th June 2022**Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I'm Police Sergeant 2882 Lee Plant of West Midlands Police, I'm currently stationed at Bilston Police station, Wolverhampton.

I've been a Police officer with West Midlands Police since 2004, during my service I have worked in a variety of roles from initial response teams, plain clothes pro-active teams, CID, Force Control room, to my current role working as the supervisor for Bilston Neighbourhood Policing team. I've worked nearly all of my service on Wolverhampton NPU.

My current responsibility is that of supervising a team of seven Police Community Support Officers (PCSO's) and fourteen Police Officers. We have geographical responsibility for Bilston East and Bilston North on the East sector of Wolverhampton. This is a large area that starts at the Willenhall / Darlaston border to the north and runs through Portobello, Green Lanes, The Lunt, Bilston town centre, Bradley, The Rocket Pool onto Hall Green where the southern part of our area meets Coseley, Tipton, Deepfields and Woodcross.

Running through my area of responsibility are several major road transport routes in and out of Wolverhampton, these are; A454 Keyway, A463 Black Country Route and A41 Wellington Road into Oxford Street. Most of my area is made up of large pockets of residential housing and also industrial sites within and close by the residential areas.

My team's role is community policing, we're in post to address issues the community raise. We aim to achieve this through problem solving policing, working with partners and using longer term interventions than our response colleagues wouldn't be able to achieve.

Being community police officers my team have ownership of specific areas and are accountable to the communities we serve through regular community meetings, such as PACT (Partners and Communities Together) meetings where members of the public have chance to meet their local policing team, partners from the council and other services such as housing and environmental health. It is at these PACT meetings that I hear residents accounts first hand of how their day to day lives are impacted by various issues. I also hear from the ward Councillors who disseminate down to me information and concerns residents have raised during contact with the Councillors. Various Councillors have raised to me the issues of street racing across the Bilston wards since taking my current post over twelve months ago.

Without meeting these residents face to face it is difficult to understand the deep impact anti-social behaviour can have on people's lives, their families and often their children. I often hear the impact this has on children of the families involved. For instance "street racers" meeting and racing along a stretch of road -

Signature

Signature witnessed by

Crime No. URN Statement of **Lee Plant**

taking out the danger they pose to themselves, other road users and the pedestrians watching the racing, they have a massive impact on the family living close by who are trying to get their child to bed but are struggling due to the level of noise from the vehicles, this then has an impact for that child the following day being tired at school etc. We are therefore keen to tackle these impactful issues but in order to do this we need to have suitable legislation in place to assist us in achieving this.

West Midlands Police have a specific operation and team in place to tackle these issues that are experienced force wide across the West Midlands conurbation. This is run under the Operation Hercules operational name. Whilst police officers can use various powers from road traffic legislation, crucial to effective policing of car cruising / street racing is an injunction – I would therefore fully support the Black Country Street racing injunction being reinstated.

I routinely check the street racing incidents coming into West Midlands police from 999 calls, 101 calls, online reporting and other methods such as intelligence and internal incident logs being created, to understand the overall picture for Bilston East and Bilston North. From having this oversight I can conclude that the issue is certainly still present across Bilston from Wednesbury through into Dudley and beyond into Staffordshire Police areas of Coven.

Between June 2020 through to March 2022 there are 251 incident logs on Bilston East, Bilston North and our neighbouring beat area of Springvale, which make reference to street racing, car cruising, boy racers and vehicles racing with elements of anti-social behaviour, eg excess speed, street racing, aggressive driving, revving engines and crowds meeting to watch the racing. Whilst some of those incidents have been reported by business and repeat callers we must recognise that there are likely to be 200 victims of this street racing and the ASB it generates.

Whilst the dedicated team and neighbourhood policing teams react to these incidents whilst they are being reported, we also pro-actively target those responsible and involved in this illegal racing through interventions post incident.

This work would be greatly assisted by having the injunction in place, I firmly believe the injunction is required to protect innocent, law abiding members of the public and business who suffer from the negative impact street racing has. The injunction is key to deter those people considering being involved in the activity and positive action should be taken against those as the communities we serve are asking for. I believe that since the injunction lapsed and those involved realised it is no longer in place Bilston and Wolverhampton has seen a steady increase in the activity again, I fear this will continue should the injunction not be renewed.

To assist the court I have produced a summary of those incidents logs, as follows;

Date of incident	Log number	Description	Details	Location
14/06/2020 20:26:20	003432- 14062020	reporting approx 4+ cars racing approx 60-70mph	-	CLINTON ROAD, WOLVERHAMPTON, WV14 7BB
14/06/2020 23:19:07	004164- 14062020	Car racing	Black country route in Bilston, group of 8 car racing, no VRNS noted	BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7BS
21/06/2020 22:02:02	003912- 21062020	VECHILE SPEEDING UP AND DOWN STREET	20 PLUS PEOPLE AND 8 VEHICLES ARE RACING UP AND DOWN THE ROAD,NO VRM,THEY ARE CURRENTLY THERE	HARE STREET, WOLVERHAMPTON, WV14 7EA

Signature

Signature witnessed by

03/2016

OFFICIAL – (when complete)

Crime No.

URN

Statement of **Lee Plant**

21/06/2020 22:11:04	003947- 21062020	vehicles are racing around and making a racket. There is a country court injunction in place.	There is about 5 vehicles. He said its for the black country route in bilston They are racing the streets and could hurt someone	LAND BETWEEN BLACK COUNTRY ROUTE, RAILWAY DRIVE, BILSTON, WOLVERHAMPTON, WV14 0NW
05/07/2020 21:50:02	004118- 05072020	REQUESTING ATTENDCE- LOG 41683	OUTSIDE THE STATION THERE IS NEMOUROUS CARS SPEEDING UP DOWN THE ROAD, THEY SEEM TO BE RACING EACHOTHER. THEY HAVE BEEN DOING THIS FOR THE LAST 15 MINTUES	WEST MIDLANDS FIRE SERVICE, BILSTON COMMUNITY FIRE STATION, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0QA
05/07/2020 21:56:55	004156- 05072020	VEHICLES RACING	SPEAKING WITH FEMALE, APPROX 12 CARS RACING UP AND DOWN THE ROAD. THERE ARE SPECTATORS 3G E 394509 N 296137 5M FEMALE REQUEST POLICE. BACKGROUND SPEECH ABOUT CARS RACING. NO DISTRESS OR DISTURBANCE	WEST MIDLANDS FIRE SERVICE, BILSTON COMMUNITY FIRE STATION, PROSSER STREET, BILSTON, WOLVERHAMPTON, WV14 0QA
18/07/2020 01:40:25	000387- 18072020	CARS CRUISING UP AND DOWN THE ROUNDABOUTS	BY MCDONALDS IN BILSTON SAYS THERE ARE 30 CARS DRIVING UP AND DOWN SAYS THERE ARE SPECTATORS ON THE ROUNDABOUT	MCDONALDS RESTAURANT, MCDONALDS RESTAURANT, HIGH STREET, BILSTON, WOLVERHAMPTON, WV14 0EZ
01/08/2020 23:54:54	004828- 01082020	cars racing	watch commander at bilston fire station has reported dozen cars racing up and down the blackcountry rout, they are donuting around the island and racing up and down. range rovers all sorts of different style cars	WEST MIDLANDS FIRE SERVICE, BILSTON COMMUNITY FIRE STATION, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0QA
07/08/2020 22:55:51	005043- 07082020	MULTIPLE CARS RACING - SPEED IN EXCESS OF 100MPH - OBS	Caller reporting mutiple cars racing and drifting, speeding in excess of 100mph. No VRMs - caller states they are going too fast.	MCDONALDS RESTAURANT, MCDONALDS RESTAURANT, HIGH STREET, BILSTON, WOLVERHAMPTON, WV14 0EZ
30/08/2020 01:48:35	000292- 30082020	BOY RACERS	FIRE CONTROL REPORTING ON BEHALF OF CREW AT LOCATION REPORTING HEAVY PRESENCE OF BOY RACERS	WEST MIDLANDS FIRE SERVICE, BILSTON COMMUNITY FIRE STATION, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0QA
12/09/2020 02:24:09	000488- 12092020	cars racing each other and have taken her fence panel out	petrol and bits of car at teh rear. has caused permanent damage to the callers fence no vrm known. unsure if cctv, possibly at neighbours but shes not up yet	42 ST CHADS ROAD, BILSTON, WOLVERHAMPTON, WV14 7AN
12/09/2020 02:42:09	000531- 12092020	Car has crashed into a fence of a house	Seems like there were two vehs racing each other and once has crashed into a fence.	102 LUNT ROAD, WOLVERHAMPTON, WV14 7AQ
11/10/2020 21:54:12	004030- 11102020	COVID BREACH 19	loads of cars cruising off the island , 50 by standers and cars at the location, 6-7 pulled up by the roundabout. near a dual carriageway near birmingham new road. more than 6 people crowding together at location CAR CRUISING	MCDONALDS RESTAURANT, MCDONALDS RESTAURANT, HIGH STREET, BILSTON, WOLVERHAMPTON, WV14 0EZ
11/10/2020 21:59:01	004056- 11102020	RACERS AT SCENE	CALLER STATES THAT THERE ARE BOY RACERS AT SCENE - ROAD IS BLOCKED - HE DOESNT FEEL SAFE AND WANTS SOMETHIN G TO BE DONE ABOUT IT. THERE APEPARS TO BE A FEW CALLS MADE NOW ABOUT THIS LOG 4030 11/10/20 RFERES. CALLER IS STUCK BY MECCA BINGO.	MCDONALDS RESTAURANT, MCDONALDS RESTAURANT, HIGH STREET, BILSTON, WOLVERHAMPTON, WV14 0EZ

Signature

Signature witnessed by

03/2016

OFFICIAL – (when complete)

Crime No.

URN

Statement of **Lee Plant**

11/10/2020 22:01:12	004069- 11102020	Racing	Cars blocking the road in preparation for street racing - vehicles parked in one lane - this is near to the retail park and Poundland warehouse.	BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7BS
11/10/2020 22:17:50	004157- 11102020	boy racers	can now see officers...	COSELEY ROUNDABOUT, COSELEY ROAD, WOLVERHAMPTON, WV14 0RH
11/10/2020 22:19:22	004162- 11102020	Op Hercules	Just past McDonalds - a lot of vehicles racing.	BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7BS
11/10/2020 22:20:08	004167- 11102020	LOTS OF CARS	boy racers are all driving past towards walsall. updated working log 3445-111020.	-
11/10/2020 22:20:36	004172- 11102020	BOY RACING- A463 BILSTON	LARGE NUMBER OF CARS RACING AND DOING DONUTS WORKING LOG 3445 UPDATED	226 BROAD LANES, WOLVERHAMPTON, WV14 0RY
22/10/2020 22:09:13	004959- 22102020	REPORTING CAR RACING AND GATHERING ON THE ROAD	THERE IS A LARGE GATHERING OF ABOUT 60 AND 100 PEOPLE SPECTATING AND THEN LOTS OF CARS RACING. -- NEAR TO THE MATALAN AND B&Q ISLAND	BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7BS
25/10/2020 01:08:32	000355- 25102020	APPROX 60 CARS RACINGS	FROM DRONE 7 ALL HAVE DISPURSED NOW	BLACK COUNTRY NEW ROAD, WOLVERHAMPTON, WV14 7BT
01/11/2020 20:21:32	004072- 01112020	asb patrols - street racing patrols	2100 - 2200	BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7BS
12/12/2020 23:15:09	004698- 12122020	100 BOY RACERS PULLED UP ON THE ISLAND	THEY ARE TOTALLY BLOCKING TH HIGHWAY OFF AT THE 4 EXITS	LUNT ISLAND, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7BT
13/12/2020 22:23:15	003906- 13122020	Car Cruising	reporting car crusing on the black country route up to 30 going round in loops...started about 10 mins ago	WEST MIDLANDS FIRE SERVICE, BILSTON COMMUNITY FIRE STATION, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0QA
13/12/2020 23:45:48	004121- 13122020	Cars racing up and down	Approx 5-6 different cars going from Mcdonalds to the B&Q island	HIGH STREET, BILSTON, WOLVERHAMPTON,
03/01/2021 22:03:59	003574- 03012021	ROUNDAABOUT NEAR THE MCDONALDS AND B&Q AND HALFORDS	Meet up of 20-30 cars. As the caller was driving past more were coming - there's an injunction on the road for car cruising, it looked like an event.	MCDONALDS RESTAURANT, MCDONALDS RESTAURANT, HIGH STREET, BILSTON, WOLVERHAMPTON, WV14 0EZ
13/02/2021 22:12:42	003716- 13022021	OS5 - PASSING BY	BLACK COUNTRY ROUTE BILSTON SPRING VALE VIEW LOTS OF BOY RACERS	MCDONALDS RESTAURANT, MCDONALDS RESTAURANT, HIGH STREET, BILSTON, WOLVERHAMPTON, WV14 0EZ
13/02/2021 22:14:04	003721- 13022021	boy racers	boy racers black country road off the birmingham new road	BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7BS
28/03/2021 22:12:52	003388- 28032021	vehicles racing	caller states its on the black country route near to oxford street island.	STRIP OF LAND BETWEEN VULCAN ROAD ISLAND AND OXFORD STREET I, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7EW
28/03/2021 22:13:40	003393- 28032021	BOY RACERS	RACING UP AND DOWN THE BLACK COUNTRY ROUTE	Jct Black Country Route - Oxford Street, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7PE
28/03/2021 22:19:18	003410- 28032021	RUNNING LOG 3393 BOY RACERS UPDATED	CALLER DID NOT FEEL H,A, D FROM IT	Jct Black Country Route - Oxford Street, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7PE
05/04/2021 21:08:34	003811- 05042021	BOY RACERS	APPROX 5 CARS AND NUMEOUS SPECTATORS	LATIFS, FORMER B AND Q UNIT, BILSTON ROAD, WOLVERHAMPTON, WV14 0TP

Signature

Signature witnessed by

03/2016

OFFICIAL – (when complete)

Crime No.

URN

Statement of **Lee Plant**

07/04/2021 22:21:30	004623- 07042021	BOY RACERS	LIVE CHAT: Numerous cars and motorbikes parked outside my house... Driving up and down the road, no head lights on, racing eachother... Thrapping engines and circling the estate	GREENWAY ROAD, WOLVERHAMPTON,
23/04/2021 22:40:38	004883- 23042021	STREET RACING	AROUND 15-20VEHS	LATIFS, FORMER B AND Q UNIT, BILSTON ROAD, WOLVERHAMPTON, WV14 OTP
23/04/2021 22:43:59	004901- 23042021	racing cars	now onthe car park	COSELEY ROAD, WOLVERHAMPTON,
17/07/2021 23:12:11	003751- 17072021	BOY RACERS	LOTS OF CARS RACING UP AND DOWN THE BLACK COUNTRY ROUTE FROM MCDONALDS IN BILSTON TOWARDS THE BIRMINGHAM NEW ROAD. 4 OR 5 VEHICLES	MCDONALDS RESTAURANT, MCDONALDS RESTAURANT, HIGH STREET, BILSTON, WOLVERHAMPTON, WV14 0EZ
17/07/2021 23:16:02	003767- 17072021	AMBULANCE STAFF REPORTING CAR CRUISING	BLACK COUNTRY ROUTE BILSTON	-
17/07/2021 23:22:14	003789- 17072021	Abandoned Call - Boy racers	Caller is not orginal operator - so no playback available ee 394615 295938 calling back... boy - been there about 20 minutes. Keep going up and down coseley road	COSELEY ROAD, WOLVERHAMPTON,
07/08/2021 22:49:52	003971- 07082021	BOY RACERS	BOY RACERS AT LEAST 10 CARS PLUS THEY ARE BLOCKING THE ISLAND BY HALFORDS TWDS BILSTON THIS IS HALFORDS WV14 0QL ON GOOGLE NOT ON CW	BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7BS
22/08/2021 22:42:30	003929- 22082021	vehicle obs	sounds like vehicles are racing in the area	39 AMBERGATE ROAD, WOLVERHAMPTON, WV14 0SB
17/10/2021 23:18:07	004017- 17102021	(D) Road Racing	They are racing from Bilston towards- Darlaston/Walsall Approx 20 cars	LUNT ISLAND, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7BT
17/10/2021 23:20:21	004022- 17102021	STREET RACING	ALONG THE BLACK COUNTRY TOWARDS BILSTON.	BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7BS
17/10/2021 23:21:07	004025- 17102021	(D) BOY RACERS	ABOUT 30 CARS LOTS OF PEOPLE ON THE DUAL CARRIAGEWAY FILMING	COSELEY ROUNDABOUT, COSELEY ROAD, WOLVERHAMPTON, WV14 0RH
17/10/2021 23:25:11	004037- 17102021	BOY RACERS	THEY ARE DRIVING RECKLESSLY AND AT HIGH SPEED. THERE IS A LARGE GATHERING BETWEEN 70-100 PEOPLE WATCHING.	MCDONALDS RESTAURANT, MCDONALDS RESTAURANT, HIGH STREET, BILSTON, WOLVERHAMPTON, WV14 0EZ
17/10/2021 23:30:46	004045- 17102021	(d) cars racing on road	caller can hear cars racing up and down the road , advised to reprot to council and have sent for obs	39 AMBERGATE ROAD, WOLVERHAMPTON, WV14 0SB
24/10/2021 22:25:13	003648- 24102021	ASB - CARS RACING	CANNOT SEE THIS, CAN JUST HEAR IT. HAS BEEN GOING ON FOR THE LAST 20MINS.	72 COSELEY ROAD, WOLVERHAMPTON, WV14 0RT
24/10/2021 22:26:29	003653- 24102021	Boy racers at location	caller is in house says noise is horrendous must be lots of cars but cant see where how many	BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7BS
24/10/2021 23:05:27	003782- 24102021	BOY RACERS	Vulcan Road Island in Bilston. Next to the police station and they were blocking the island and drifting round the island	Jct Black Country Route - Hare Street, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7ED
31/10/2021 23:02:10	004344- 31102021	RACERS - 20 IN CARS	RACING UP AND DOWN THE ROAD - YOUTHS WATCHING FROM GRASS VERGES BEWTEEN TWO DUAL CARRIAGEWAYS FOR OBS	CITADEL JUNCTION, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7BT

Signature

Signature witnessed by

Crime No.

URN

Statement of **Lee Plant**

06/11/2021 22:53:15	004450- 06112021	20 PLUS VEHICLES RACING UP TO THE ISLAND NEAR MORRISONS	NO VRM DETAILS	MORRISONS SUPERMARKET, MORRISONS, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0DZ
06/11/2021 22:54:59	004457- 06112021	CAR CRUISING	STATES OVER 30 CARS ARE THERE. THIS HAS BEEN GOING ON FOR PAST 20 MINS.	OXFORD STREET, BILSTON, WOLVERHAMPTON,
13/11/2021 20:06:05	003390- 13112021	possible cloned	06.11.2021 23.15hrs caller stating he has recieved a notice about street racing for his vehicle from west midlands police	HARE STREET, WOLVERHAMPTON, WV14 7EA
21/11/2021 22:23:00	003787- 21112021	BOY RACERS	CALLER REPORTING BOY RACERS, ON BLACK COUNTRY ROUTE	MORRISONS SUPERMARKET, MORRISONS, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0DZ
21/11/2021 22:28:25	003813- 21112021	Car cruising	Advised it has already been reported	-
21/11/2021 22:29:01	003816- 21112021	boy racers	around 100 cars racing - 100 people standing outside vw garage - watching aswell	GREENHOUS VOLKSWAGEN VAN CENTRE, VOLKSWAGEN VAN CENTRE, TRINITY ROAD, WOLVERHAMPTON, WV14 7EF
19/12/2021 23:00:36	004031- 19122021	boy racers in the street	come off the motorway by the back of bilston football ground - lots of boy racers - at least 50 cars	VULCAN GARAGE, VULCAN WORKS, VULCAN ROAD, WOLVERHAMPTON, WV14 7HT
19/12/2021 23:06:15	004054- 19122021	boy racers	100 vehicles parked up, all boy racers. 50 people outside the vehicles cheering the cars on.	GREENHOUS VOLKSWAGEN VAN CENTRE, VOLKSWAGEN VAN CENTRE, TRINITY ROAD, WOLVERHAMPTON, WV14 7EF
19/12/2021 23:16:26	004084- 19122021	BOY RACERS	LARGE CROWDS GATHERING ON THE ISLAND ON BLACK COUNTRY ROUTE NEAR THE POLICE STATION	STRIP OF LAND BETWEEN VULCAN ROAD ISLAND AND OXFORD STREET I, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7EW
26/12/2021 17:28:53	002195- 26122021	OP HERCULES	-	VULCAN ROAD, WOLVERHAMPTON, WV14 7LF
30/12/2021 12:17:30	001573- 30122021	issues with car racing on the blackcountry route	happens mainly on sunday evenings, caller has cctv footage	GREENHOUS VOLKSWAGEN VAN CENTRE, VOLKSWAGEN VAN CENTRE, TRINITY ROAD, WOLVERHAMPTON, WV14 7EF
01/01/2022 23:14:58	004585- 01012022	BOY RACERS - AT LEAST 12 CARS - BOTH SIDES OF CARRIAGEWAY	TOWARDS M6 J10 AND TOWARDS BILSTON	Jct Wood Street - Black Country Route, WOOD STREET, BILSTON, WOLVERHAMPTON, WV14 0ST
15/01/2022 21:54:57	003852- 15012022	BOY RACERS	ABOUT 60 CARS RACING. THEY ARE COMING FROM BIRMINGHAM NEW ROAD TO THE BLACK COUNTRY ROUTE TOWARDS BILSTON.	Jct Black Country Route - Coseley Road, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0EZ
15/01/2022 22:10:23	003913- 15012022	BOY RACERS BILSTON END OF BLACK COUNTRY ROUTE	black country route	LUNT ISLAND, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7BT
15/01/2022 22:11:41	003919- 15012022	3835-150122	FURTHER CALL FROM A FEMALE STATING SHE CAN WITNESSE BOY RACERS. LOG 3835-150122	-
22/01/2022 22:45:01	003716- 22012022	boy racers	birmingham new road onto black country route down towards bilston and then back round roughly around 20 boy racers been on going for the past 15-20 minutes	BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7BS

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Crime No. URN Statement of **Lee Plant**

22/01/2022 22:48:40	003729- 22012022	CAR CRUISING	HAPPENS REGULARLY . I want to report car cruising and street racing occurring right now on Coseley road and the Black Country route. This is weekly incident and it's happening again right now. I was advised last week by Bilston police station to report on webchat as soon as it happens again	Jct Coseley Road - Black Country Route, COSELEY ROAD, WOLVERHAMPTON, WV14 0EZ
28/01/2022 22:18:55	004166- 28012022	Boy racers	Driving up the Black Country Route and around the Coseley Road Island 3 vehicles seen so far There is a red vauxhall parked up with a male sat on top recording	Jct Black Country Route - Coseley Road, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0EZ
27/02/2022 21:48:46	003634- 27022022	AT LEAST 20 BOY RACERS RACING ONE ANOTHER	OTTA BE AT LEAST 20 VEHICLES. RACING ONE ANOTHER - SPEEDING UP THE ROAD, TAKING OFF, HOLDING UP ONE OF THE EXITS - AN ACCIDENT WAITING TO HAPPEN	STRIP OF LAND BETWEEN VULCAN ROAD ISLAND AND OXFORD STREET I, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7EW
27/02/2022 21:52:10	003648- 27022022	Op Hercules - approx 20 plus vehicles in attendance	Bilston NHT patrolling the area at this time and gathering evidence as in unsuitable vehicles.	BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7BS
06/03/2022 21:17:10	003627- 06032022	INTEL SUGGEST BOY RACERS ARE HERE	TRAFFIC WILL MAKE TOWARDS	STRIP OF LAND BETWEEN VULCAN ROAD ISLAND AND OXFORD STREET I, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7EW
06/03/2022 22:43:26	003889- 06032022	boy racers	aware on log 3627-060322	-
06/03/2022 22:43:40	003890- 06032022	BOY RACERS	50 VEHICLES RACING UP AND DOWN THE ROAD	VULCAN ROAD, WOLVERHAMPTON, WV14 7LF
13/03/2022 23:39:16	003975- 13032022	boy racers around 15-20 cars	off hare street bilston - racing around vulcan road island on black country. Cars parked on hare street then coming out on to island and down black country route	STRIP OF LAND BETWEEN VULCAN ROAD ISLAND AND OXFORD STREET I, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7EW
19/03/2022 23:23:57	004259- 19032022	NON STOP RTC	NON STOP RTC AT 22:00, BLACK FORD FIESTA, NO VRM, CAR WAS RACING.. BOTH CARS GOING FROM B&Q TOWARDS THE ISLAND. OFFENDING CAR SPUN CAUSING THE RTC. NO INJURIES AT PRESENT	Jct Black Country Route - Coseley Road, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0EZ
17/07/2020 22:13:42	004888- 17072020	LARGE GATHERING OUTSIDE THE HOUSE	15-20 PEOPLE ARE NEAR THE STREET AND THERE MAY HAVE BEEN A APRTY VEHS ALSO SEEN RACING UP AND DOWN THE ROAD NEAR THE ABOVE LOCATION	7 CEDAR GROVE, BILSTON, WOLVERHAMPTON, WV14 6NX
22/09/2020 18:32:30	004114- 22092020	MOTORBIKES RACING - ONGOING	REGULAR BIKES SPEEDING UP AND DOWN CALLERS ROAD. VRMS UNKNOWN AND CALLER IS NOT SURE ON WHAT BIKES THEY ARE. JUST CONCERNED OF THE SPEED OF THE BIKES. DOES NOT HAPPEN EVERYDAY	58 WILLENHALL ROAD, BILSTON, WOLVERHAMPTON, WV14 6NW
28/12/2020 13:36:01	001913- 28122020	Vehicles on the field	2 4x4s were racing on the field, have now gone onto the main road, unknown direction. No vrms that caller saw.	GREEN LANES, WOLVERHAMPTON,

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Statement of **Lee Plant**

28/06/2021 08:49:25	000804- 28062021	REPORTING DANGEROUS DRIVING	NARROW ROAD WITH CARS PARKED DOWN BOTH SIDES, CARS RACING DOWN AT ALL TIMES DURING THE DAY. CALLER HAS CONTACTED THE COUNCIL REGARDING SPEED BUMPS TO BE PUT IN PLACE AND HAS BEEN SIGNPOSTED TO OURSELVES	WESTFIELD ROAD, PORTOBELLO, WOLVERHAMPTON, WV13 3JX
19/11/2021 15:23:20	002832- 19112021	has received warning letter	his vehicle was spotted 6/11/21 at a car meet and if seen again the vehicle would be siezed. he does not deny he was there but is was to sell some alloys. he denies being part on the meet. advised i would email the officer who sent the letter and if he comes across any more meets like this to turn round and go the other way	59 CASTLECROFT ROAD, BILSTON, WOLVERHAMPTON, WV14 6NT
15/01/2022 21:45:37	003810- 15012022	racers blocking the road	there are about 30 cars by the halfords - they are all racing	Jct Springfield Road - Central Avenue, SPRINGFIELD ROAD, STOWLAWN, WOLVERHAMPTON, WV14 6LW
14/06/2020 23:06:27	004112- 14062020	CAR CRUISE	OVER 100 AND BEING FILMED.	HALFORDS LTD, HALFORDS, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
14/06/2020 23:40:56	004253- 14062020	boy racers	there are 40 cars in the car park and the males are racing up and down	SPRINGVALE AVENUE, WOLVERHAMPTON, WV14 0QL
21/06/2020 22:02:00	003911- 21062020	CAR CRUISING/RACING	AROUND 30 VEHICLES RACING AND AROUND 40 PEOPLE STANDING BY THE ROAD VIDEOING.. NO VRMS OR DESCRIPTIONS.	SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
21/06/2020 22:02:23	003914- 21062020	BOY RACERS - AROUND 100 VEHICLES	BLOCKING ROUND ABOUT NEAR MATALAN AND FIRE STATION	Jct Black Country Route - Birmingham New Road, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 9PW
21/06/2020 22:09:59	003943- 21062020	Bor racers	50 cars, racing on the road	SPRINGVALE AVENUE, WOLVERHAMPTON,
05/07/2020 21:44:03	004095- 05072020	DRAG RACING 100+	BY THE POUNDLAND DIS CENTRE	SPRINGVALE AVENUE, WOLVERHAMPTON, WV14 0QL
05/07/2020 21:49:33	004114- 05072020	VEHICLES RACING	ABOUT 100 VEHICLES INVOLVED, THEY ARE HEADING ONTO THE BLACKCOUNTRY ROUTE, GOING ON THR WRONG SIDE OF THE ROAD.	SPRINGVALE AVENUE, WOLVERHAMPTON, WV14 0QL
05/07/2020 21:53:23	004138- 05072020	Around 100 cars racing	They are blocking the island. No vrms known as there are around 100 vehicles and driving at speed.	SPRINGVALE AVENUE, WOLVERHAMPTON,
05/07/2020 21:56:52	004155- 05072020	Vodafone. 68% E 394192 N 296214	Playback - "police please", female voice, very calm. No distress or disorder heard. Then cleared. ** Calling back - 100 cars racing between McDonalds in Bilston and B&Q on the Black Coutry Route	SPRINGVALE AVENUE, WOLVERHAMPTON,
06/07/2020 09:33:38	000898- 06072020	CAR CRUISING LAST NIGHT	REPORTS HAPPENING MOST SUNDAY AND MONDAY NIGHTS ON BLACK COUNTRY ROUTE. APPROX. 80 VEHICLES AND 150 PEOPLE STOOD WATCHING. BLOCKED EXIT FOR EMPLOYEES.	POUNDLAND, POUNDLAND DEPOT, SPRINGVALE AVENUE, WOLVERHAMPTON, WV14 0QL
06/07/2020 16:18:15	003304- 06072020	NEIGHBOURS CAT HAS KILLED MY PIGEONS	TRIED TO SPEAK TO NEIGHBOURS RACING PIGEONS IT HAS KILLED 2 FLEDGLINGS WORTH THOUSANDS OF POUNDS	32 POND GROVE, WOLVERHAMPTON, WV2 1HQ

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Statement of **Lee Plant**

10/07/2020 22:21:49	004853- 10072020	Boy racers. Lots of cars racing on the blackcountry route	Just nearly run into callers car	MATALAN RETAIL LTD, MATALAN, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
10/07/2020 22:22:53	004862- 10072020	50-60 CARS SCREECHING AND RACING AROUND B & Q	CALLER REPORTING THAT 50-60 CARS RACING AND SCREECHING AROUND LOCATION. STARTING TO LEAVE VIA WHITEY ROAD BY THE FIRE STATION	B AND Q DEPOT, SPRINGVALE BUSINESS PARK, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QT
10/07/2020 22:27:11	004883- 10072020	BOY RACERS MEET UP	-	Jct Black Country Route - Springvale Way, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0QL
10/07/2020 22:30:35	004894- 10072020	100 sports car racing bmw 1 series has speed past me	standing round the island working log4862-100720	B AND Q DEPOT, SPRINGVALE BUSINESS PARK, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QT
16/07/2020 22:15:46	004847- 16072020	VEHICLES RACING AT LOCATION	ONGOING ISSUE, UNABLE TO CONFIRM QTY OF VEHICLES	SPRINGVALE WAY, WOLVERHAMPTON,
16/07/2020 22:15:47	004848- 16072020	GROUP OF BOYRACERS ARRIVING AT LOCATION	CALLER UNSURE HOW MANY CARS EXACTLY BUT HES JUST LEAVING WORK AND NOTICED A LARGE AMMOUNT OF VEHICLES PULLING UP INTO LOCATION, PREVIOUSLY HAD CAR MEET/RACES THERE THE OTHER DAY	SPRINGVALE AVENUE, WOLVERHAMPTON, WV14 0QL
18/07/2020 01:38:12	000383- 18072020	report of car racing in area	caller says that one his drivers have said that the road said that they have blocked the road says that sounds like a 6 vehs and three abreast on black country route	POUNDLAND, POUNDLAND DEPOT, SPRINGVALE AVENUE, WOLVERHAMPTON, WV14 0QL
07/08/2020 22:49:43	005011- 07082020	people drag racing aprpx 20 cars there	this is by the halfords and matalan. there is aprpx 40 person also there causing issues to other drivers	MATALAN RETAIL LTD, MATALAN, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
07/08/2020 23:02:09	005075- 07082020	BOY RACERS	2X CARS RACING UP & DOWNROAD. ONYL 2 AT THIS TIME BUT OTHERS WAITING. 20 CARS ROUGHLY	SPRINGVALE WAY, WOLVERHAMPTON,
07/08/2020 23:02:24	005077- 07082020	CARS RACING - GATHERING BEGINNING/OP RELIANT	DRAG RACING ALONG THE BLACK COUNTRY ROUTE NEAR THE MATALAN - APPROX 10 VEHICLES 4/5 PARKED UP READY TO RACE ALONG THE ROAD WAITING THAT THE R/A	SPRINGVALE WAY, WOLVERHAMPTON,
07/08/2020 23:12:00	005114- 07082020	Street Racing	100+ people, people in the street 40 odd cars. racing around on the island.	SPRINGVALE WAY, WOLVERHAMPTON,
07/08/2020 23:20:56	005152- 07082020	FURTHER CALL - CARS RACING UP AND DOWN - LOG 5077 REFERS	CALLER STATING THAT SHE CAN HEAR VEHICLES RACING UP AND DOWN.. THEY SOUND LIKE THEY ARE DRIVING AT SPEED.	SPRINGVALE WAY, WOLVERHAMPTON,
07/08/2020 23:38:46	005253- 07082020	VEHICLES RACING	ON THE BLACK COUNTRY ROUTE NEAR B AND Q IN BILSTON - APPROX 30 CARS RACING	SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
08/08/2020 22:29:53	004891- 08082020	boy racers	Theres loads of poeple there - theres loads of people standing outside their cars - by the matalan.	MATALAN RETAIL LTD, MATALAN, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
08/08/2020 22:35:36	004922- 08082020	looks like they are about to start racing	modified cars on the Black County route people are also gathering	SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL

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Statement of **Lee Plant**

08/08/2020 23:00:48	005045- 08082020	STREET RACING/DANGEROUS DRIVING - HIGH COURT INJUNCTION - OBS	Caller reporting Street Racing in progress in an area where it is banned via High Court Injunction. Have asked caller how many vehicles involved and they have unexpectedly cleared the line.	SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
09/08/2020 21:22:13	004244- 09082020	cars racing	there are approx 30 cars going up and down dual carriageway wrong way and blocking island	SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
14/08/2020 23:02:50	005082- 14082020	2 TO 4 BOY RACERS ON BLACK COUNTRY ROUTE	CALLER CAN ONLY HEAR THEM NOT SEE THEM SO NO VRMS OR DESCRIPTIONS APPEARS THAT THEY HAVE ALSO TORN DOWN THE INJUNCTION SIGNAGE	MECCA BINGO CLUB, MECCA BINGO CLUB, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
14/08/2020 23:20:56	005164- 14082020	Street Racing	Updated on log 5134 14/08/20	HALFORDS LTD, HALFORDS, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
14/08/2020 23:24:03	005180- 14082020	CARS RACING UP AND DOWN DUAL CARRIAGEWAY	ABOUT 60-70 CARS - PARKED UP BY HALFORDS, TAKING IT IN TURNS TO RACE	HALFORDS LTD, HALFORDS, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
16/08/2020 23:42:10	004439- 16082020	BOY RACING	BOY RACING ON THE ROUTES BY THE MATALAN AND B&Q. APPROX 5 CARS INVOLVED, CAN ONLY HEAR NOT SEE. NO DESC OR VRMS	MATALAN RETAIL LTD, MATALAN, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
21/08/2020 23:51:25	005407- 21082020	vehicles racing	around 20 cars. no vrms known. driving dangerously and speeding and racing each other	SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
21/08/2020 23:53:53	005418- 21082020	30-40 cars racing up blackcountry route	1 little white fiat 500 - but many more....	B AND Q DEPOT, SPRINGVALE BUSINESS PARK, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QT
30/08/2020 08:21:14	000789- 30082020	STREET RACING LAST NIGHT	ADVISED TO CALL US WHEN IT HAPPENE	B AND Q DEPOT, SPRINGVALE BUSINESS PARK, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QT
30/08/2020 21:59:45	003840- 30082020	Car cruising	Call from Mecca bingo stating that there is a gathering of boy racers in Springvale Way. There are about 30 cars and they are blocking the road and stopping the customers from leaving the Bingo club.	MECCA BINGO CLUB, MECCA BINGO CLUB, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
07/09/2020 18:12:59	003867- 07092020	4 PEOPLE RACING UP AND DOWN ON MOPED	2 MALES AND 2 PEOPLE RACING UP AND DOWN ART SPEED ON HOMEMADE MOPED NO VRM.	50 SIDWICK CRESCENT, WOLVERHAMPTON, WV2 2NX
09/10/2020 22:55:47	004926- 09102020	racing vehicles	Repeat ASB caller can hear a number of vehicles racing on the black country route close to his home. This has been happening for approx 30 mins.	16 FINNEYWELL CLOSE, WOLVERHAMPTON, WV14 9XN
11/10/2020 21:54:42	004034- 11102020	boy racers have blocked road	taxi driver. for your information there are 60 cars just by b&q they have blocked the road and racing each other	Jct Springvale Way - Black Country Route, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
11/10/2020 21:56:36	004043- 11102020	RACING GOING ON- WE ARE HAVING TO QUEUE UP	THIS IS ON THE A463- THERE ARE X2 ROWS OF CARS- ALL STATIONARY, SOMEONE STANDING IN THE MIDDLE OF THE ROAD AND THEY ARE RACING- PEOPLE ARE WATCHING ON THE PATHS	MATALAN RETAIL LTD, MATALAN, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
11/10/2020 21:56:41	004044- 11102020	30 or 40 cars racing around near the b and q	-	HALFORDS LTD, HALFORDS, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL

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Statement of **Lee Plant**

11/10/2020 22:01:26	004070- 11102020	BOY RACERS RACING UP AND DOWN THE STREET	ISLAND IS COMPLETELY BLOCKED, I CAN NOT GET OUT	SPRINGVALE HOUSE, VILLAGE WAY, WOLVERHAMPTON, WV14 0QR
11/10/2020 22:02:00	004073- 11102020	CARS CRUISING/RACING	ON BOTH SIDES OF THE ISLAND - GETTING FOR 100 VEHICLES AND AT LEAST A COUPLE OF 100 PEOPLE - CAUSING TRAFFIC AND PEOPLE ARE STUCK	MCDONALDS RESTAURANT, MCDONALDS RESTAURANT, HIGH STREET, BILSTON, WOLVERHAMPTON, WV14 0EZ
11/10/2020 22:03:20	004084- 11102020	DANGEROUS DRIVING.	i was just driving, i have come to a roundabout and some cars are racing around the roundabout near B&Q. from mcdonalds roundabout, they nearly hit me, i have my children in my car.	Jct Springvale Way - Black Country Route, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
11/10/2020 22:04:40	004095- 11102020	disorder 50 plus cars racing using the road as a race track	CALLER STATES THIS IS BY B&Q ON THE BLACK COUNTRY ROUTE	BIRMINGHAM NEW ROAD, WOLVERHAMPTON,
11/10/2020 22:06:24	004104- 11102020	about 40 cars racing up and down the road	parked either side of the road and taking it in turns racing	SPRINGVALE AVENUE, WOLVERHAMPTON,
11/10/2020 22:07:46	004110- 11102020	LARGE OF GATHERING IN CARS	CARS ARE STUCK IN THE ROAD - 200 CARS THERE. FEMALE IS DISTRAUGHT ON THE PHONE. KEEPS SAYING WISH YOU HURRY AND SAYING THEY ARE RACING UP AND DOWN THE ROAD AND NO-BODY CAN GET OUT	MECCA BINGO CLUB, MECCA BINGO CLUB, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
11/10/2020 22:11:24	004127- 11102020	20 cars racing through street	have been racing last 10 mins. driving at very high speeds	SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
11/10/2020 22:14:40	004141- 11102020	boy racers	-	MECCA BINGO CLUB, MECCA BINGO CLUB, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
11/10/2020 22:17:22	004155- 11102020	Log update	Op Hercules log 3445 11.10.20 updated	Unknown location
11/10/2020 22:27:08	004199- 11102020	Just drove past here, there is a massive car meet here	3445-111020	HALFORDS LTD, HALFORDS, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
11/10/2020 22:35:46	004238- 11102020	NOT HAPPY WITH POLICE	CALLER NOT HAPPY THAT POLICE DID NOT DEAL WITH BOY RACERS- LOG 3445-111020- ADVSIED WE ARE DEALING AND IS SHE IS NOT HAPPY SHE CAN MAKE COMPLAINT	MECCA BINGO CLUB, MECCA BINGO CLUB, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
18/10/2020 20:11:20	003890- 18102020	CAR DRIVING DANGEROUSLY	WANTS TO REPORT DANGEROUS DRIVING. VRM: Y309FEV BMW 4 SERIES DESC OF DRIVER: ASIAN, APPROX IN 20'S, DARK CLOTHING. THEY WERE SEEN BLOCKING BOTH LANES AND RACING. THINKS THEY MAY BE ON SOMETHING OR HAD HAD A DRINK.	PARKFIELD ROAD, WOLVERHAMPTON, WV2 2LH
18/10/2020 21:48:48	004266- 18102020	BOY RACERS	SHE REPORTED BOY RACERS TO US LAST WEEK. SHE HAS SAID THE BOY RACERS ARE BACK AT LOCATION AGAIN. THEY ARE RACING UP AND DOWN THE ROAD. APPROX 20-30 CARS THERE AT THE MOMENT.	MECCA BINGO CLUB, MECCA BINGO CLUB, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
18/10/2020 21:55:02	004283- 18102020	CARS GATHERING - APPROX 15 AT PRESENT PARKED UP	THIS IS RIGHT BY B&Q - THERES ALSO APPROX 10 VEHICLES RACING FROM BLACK COUNTRY ROUTE TO BHAM NEW RD	B AND Q DEPOT, SPRINGVALE BUSINESS PARK, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QT

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Statement of **Lee Plant**

22/10/2020 21:59:49	004912- 22102020	STREET RACERS ON THEIR WAY TO LOC NOW	ON SNAPCHAT WV14 0QL next street race location reported the last police arrived and stopped it. they keep locations up to date and post it up when there moving to another. Police turned up as I told last location.	SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
22/10/2020 22:08:07	004952- 22102020	cars racing-50 of them	caller states its happening near b&q. she states its just started now and they have nearly hit into caller.	TURTONS CROFT, WOLVERHAMPTON, WV14 9XW
22/10/2020 22:11:17	004967- 22102020	BOY RACERS CAUSING ISSUES	LOTS OF BOY RACERS ON THE ISLAND BY B&Q THEY HAVE TRIED COMING ONTO CAR PARK BUT DEBBIE MOVED THEM ON AS BARRIERS SHUT AT 2300 HRS	MECCA BINGO CLUB, MECCA BINGO CLUB, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
25/10/2020 01:00:08	000347- 25102020	BOY RACERS, MORE THAN 1.	-	SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
25/10/2020 01:10:14	000358- 25102020	BOY RACERS	NEAR TO HALFORDS AND ON THE BCR.	HALFORDS LTD, HALFORDS, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
25/10/2020 22:57:21	004470- 25102020	Boy Racers back on black country route	Caller doesnt know how many there are but can hear them, regular occurrence on friday and sundays predominetly.	MECCA BINGO CLUB, MECCA BINGO CLUB, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
25/10/2020 23:02:34	004492- 25102020	BOY RACERS	THEY ARE DOING DONUTS ETC THERE ARE LOTS OF PEOPLE WATCHING	LAND WEST OF SPRINGVALE ISLAND, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0QL
25/10/2020 23:06:50	004508- 25102020	sedgemoor park - boy racers on the black country route.	caller can only hear them. No VRMs.	SIDCUP CLOSE, WOLVERHAMPTON, WV14 9XL
25/10/2020 23:11:04	004520- 25102020	BOY RACERS	CALLER STATES THAT THERE IS ABOUT 100 PEOPLE THERE NO SOCIAL DISTANCING AND THEY ARE DRAG RACING. THEY ARE DRAG RACING BLACK COUNTRY ROUTE. CALLER STATES THAT THERE IS AN INJUCATION IN PLACE WITH THE COUNCIL NOT FOR THEM TO DO THIS.	B AND Q DEPOT, SPRINGVALE BUSINESS PARK, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QT
14/11/2020 22:56:37	004441- 14112020	BOY RACERS	ALMOST 5 VEHICLES - STARTED 5 MINS AGO , SAME AS LAST TIME, REGULAR ISSUE - BLACK COUNTRY ROUTE NO VEH DETAILS	MATALAN RETAIL LTD, MATALAN, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
29/11/2020 22:07:48	003643- 29112020	street racing	on the birmingham road, reported by ambo crew number of persons racing and spectating	57 BIRMINGHAM ROAD, WOLVERHAMPTON, WV2 3LH
25/12/2020 23:29:17	003138- 25122020	BOY RACING	ONGOING ISSUE- ALL THE SAME AS THE PREVIOUS CALLS REGARDING THIS. CALLER IS SAT IN HIS LIVING ROOM, VERY NOISEY BOY RACERS ON BLACK COUNTRY ROUTE- NO VRMS KNOWN NO OTHER INFO KNOWN	MATALAN RETAIL LTD, MATALAN, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
06/02/2021 22:37:24	004237- 06022021	DRAG RACING ON DUAL CARRIAGEWAY - TRAFFIC HELD	20-30 CARS USING BOTH SIDES OF DUAL CARIAGEWAY	Jct Springvale Way - Black Country Route, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
13/02/2021 22:13:06	003719- 13022021	IS B&Q - CAR MEET.	THERE ARE 30 CARS ALL MEETING TOGETHER SPEEDING AND DOING DONUTS AND THEN RACING AROUND THE ROUNDABOUT DOING AROUND 100MPH.	MATALAN RETAIL LTD, MATALAN, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL

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Statement of **Lee Plant**

04/03/2021 14:02:47	002176- 04032021	DANGEROUS DRIVRS	CALLER STATES THAT THERE WAS 4 CARS RACING AND 1 NEARLY HIT THE CALLER ON THE PAVEMENT - NO VRMS FOR ANY VEHS AND THEY HAVE LEFT IN THE DIRECTION OF BILSTON	HARDY SQUARE, WOLVERHAMPTON, WV2 2EL
21/03/2021 21:49:12	003725- 21032021	FOR INFO - BOY RACERS	-	LAND WEST OF SPRINGVALE ISLAND, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0QL
05/04/2021 21:12:36	003821- 05042021	CAR CRUISING	THERE ARE 30 ODD CARS CRUISING. THEY ARE PARKED UP BY THE ISLAND. CANNOT GET OUT. WE ARE STUCK	HALFORDS LTD, HALFORDS, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
10/04/2021 22:46:56	003752- 10042021	BOY RACERS	SEVERAL VEHS UNDERTOOK CALLER, SPEEDING AT 70MPH, FORD FOCUS RED AND BLACK. OCCURED 5/10 MINS AGO. CALLER STATES THAT SVERAL VEHS RHAD BEEN RACING UP AND DOWN THE ROAD. NO VRMS NOT KNOWN	BIRMINGHAM NEW ROAD, WOLVERHAMPTON, WV4 6EH
17/04/2021 23:44:19	004473- 17042021	BOYRACERS	30-40 VEHICLES RACING - SOME WATCHING ON THE BCA AUCTIONS SITE AS WELL..	B AND Q DEPOT, SPRINGVALE BUSINESS PARK, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QT
09/05/2021 20:16:58	003484- 09052021	STREET RACING	BLUE BMW AND A BLACK RANGE ROVER RACING	BIRMINGHAM NEW ROAD, WOLVERHAMPTON, WV4 6EH
30/05/2021 21:36:49	003826- 30052021	BOY RACERS ON BLACK COUNTRY ROUTE	AROUND 50 CARS ON THE ISLAND, CALLER STRUGGLED TO GET OVER THE ISLAND BUT HAS MANAGED TO NOW.	BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 7BS
30/05/2021 21:38:00	003830- 30052021	20-30 CAR RACING UP AND DOWN	NO VRMS PEOPLE STANDING AT THE SIDE OF THE ROAD AS WELL	HALFORDS LTD, HALFORDS, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
08/06/2021 22:22:25	004877- 08062021	Op Hercules	1A INTEL	SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
11/06/2021 23:40:05	005023- 11062021	POSS BOY RACERS	OUTSIDE OUR ESTATE ON CABLE STREET, 2-3 CARS ARE CRUISING DOING 80MPH, DRIVING UP AND DOWN, HAS BEEN HAPPENING FOR 30 MINS NOW.	22 EUREKA GARDENS, WOLVERHAMPTON, WV2 2JA
16/07/2021 23:09:41	004420- 16072021	boy racers on car park	4 vehicles doing wheel spins driving eratically around the car park	SHARPS BEDROOMS LTD, SHARPS INTERIORS, SPRINGVALE AVENUE, WOLVERHAMPTON, WV14 0QL
24/07/2021 16:09:19	002539- 24072021	2 X ST'S RACING - NEARLY CAUSED ACCIDENT	VRM - FD17 OHB VRM - RS53 UFO BOTH RACING EACH OTHER	BIRMINGHAM NEW ROAD, WOLVERHAMPTON,
23/08/2021 16:58:21	002914- 23082021	BOY RACERS	WECHAT We have heard several car cruising including vehicles cruising around roundabouts close to houses in the middle of the night and on one occasion in the day	Jct Springvale Way - Black Country Route, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
23/09/2021 14:00:42	002138- 23092021	SINGLE BOY RACER	-	HARLEY DRIVE, WOLVERHAMPTON, WV14 0UN
17/10/2021 23:27:27	004039- 17102021	asb - vehicle racing	one of our crews where on their way back to the depo and noticed 100s of cars racing around - like a car meet	SPRINGVALE AVENUE, WOLVERHAMPTON, WV14 0QL
22/10/2021 21:40:49	004411- 22102021	BOY RACERS	CALLER CAN HEAR CAR DOIJNG BURN OUTS, COMING FROM DIRECTION OF CABLE STREET	CABLE STREET, WOLVERHAMPTON, WV2 2HX
24/10/2021 22:23:57	003643- 24102021	boy racers - 100 cars	boy racers , racing around here, they have blocked the road. about 100 cars here. this is outside B & Q	SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL

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Statement of **Lee Plant**

24/10/2021 22:25:13	003649- 24102021	Boy racers	with approx 100 people watching. 30/40 vehicles ready to race	B AND Q DEPOT, SPRINGVALE BUSINESS PARK, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QT
24/10/2021 22:26:31	003654- 24102021	BOY RACERS	CALLER IS STUCK IN A TAXI. HE IS BY HALFORDS AND MECCA BILSTON. THERE ARE A LOAD OF BOY RACERS AT LOCATION AND THEY HAVE BLOCKED ALL THE ROADS OFF AND ARE CAUSING DISRUPTION TO OTHER DRIVERS	J A G, SPRINGVALE INDUSTRIAL PARK, UNION STREET, ETtingshall, WOLVERHAMPTON, WV14 0GL
24/10/2021 22:47:05	003720- 24102021	CARS DRIVING FAST	GIRLFRIEND HAS JUST GOT HOME AND THERE ARE CARS RACING ON THE ROAD AND BLOCKING THE ROAD	HALFORDS LTD, HALFORDS, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
27/10/2021 21:56:34	003916- 27102021	CALLER STATING CARS RACING ON STREET	CALLER STATING THE CARS WERE BLOCKING THE ROAD AND THEN DRAG RACING UP AND DOWNT HE ROAD. VEHICLES HAVE NOW GONE NO DESCRIPTIONS. NO ENOUGH FOR INTEL CALLER ADVISED ANY INFO CALL POLICE BACK	110 DURBERVILLE ROAD, WOLVERHAMPTON, WV2 2EZ
31/10/2021 22:42:30	004256- 31102021	I AM STUCK ON AN ISALND BOY RACERS DRIVING THE WRONG WAY	BOY RACERS USING THE ISLAND AS A RACE TRACK CALLER IS TERRIFIED DRIVING THE WRONG WAY CALLER IS SAYING OH MY GOD THEY ARE GOING TO HIT ME	SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
31/10/2021 22:47:06	004285- 31102021	BOY RACERS	A463 AT BILSTON AND THERE ARE 30 PLUS CARS - BOY RACING	Jct Springvale Way - Springvale Avenue, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
06/11/2021 23:00:23	004474- 06112021	boy racers have blocked the road off	no one can get around unknown how many are involved no vrms	LAND WEST OF SPRINGVALE ISLAND, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0QL
06/11/2021 23:06:53	004498- 06112021	BOY RACERS	AROUND 50 DRIVING AT SPEED CUSTOMERS CANNOT GET OUT OF THE CAR PARK	THE ELISABETH ARMS, THE ELIZABETH ARMS PUBLIC HOUSE, OVERFIELD DRIVE, WOLVERHAMPTON, WV14 9XW
06/11/2021 23:38:09	004602- 06112021	CAR CRUISING	3361-061121 UPDATED	8 OVERFIELD DRIVE, WOLVERHAMPTON, WV14 9XW
13/11/2021 23:02:53	004035- 13112021	BLACK COUNTRY ROUTE	boy racers - OP HERCULES over 25 vehicles racing and drifting round the springvale island	LAND WEST OF SPRINGVALE ISLAND, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0QL
13/11/2021 23:04:49	004041- 13112021	CARS RACING ON THE DUAL CARRIAGEWAY	THEY HAVE TRIED TO FORCE THE CALLER OFF THE ROAD. THERE ARE ABOUT 50 CARS AND 100 SPECTATORS WATCHING.	SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
13/11/2021 23:12:42	004067- 13112021	CAR RACING	-	LAND WEST OF SPRINGVALE ISLAND, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0QL
21/11/2021 21:46:45	003679- 21112021	boy racers	boy racers , approx 100 cars, caller saying her car is blocked in	MECCA BINGO CLUB, MECCA BINGO CLUB, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
21/11/2021 21:46:47	003680- 21112021	Car cruising	Caller states they are outside B&Q and the road is blocked with the amount of cars that are racing up and down the road. Caller states there is around 100 cars	Jct Springvale Way - Black Country Route, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
21/11/2021 21:50:58	003692- 21112021	YOUTHS CAR CRUISING ON BLACK COUNTRY ROUTE	AT LEAST 60 CARS 3680-211121 IS WORKING LOG AND HAS BEEN UPDATED	[OUTSIDE] MATALAN RETAIL LTD, MATALAN, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL

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Statement of **Lee Plant**

21/11/2021 21:53:03	003698- 21112021	BOY RACERS	3680 OF 21/11 REFERS TO RUNNING LOG	Jct Springvale Way - Black Country Route, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
19/12/2021 22:27:05	003926- 19122021	CAR CRUISING	AT LEAST 20 CARS RACING UP AND DOWN THE ROAD, HAPPENING FOR LAST 10 MINS SPECTATORS ARE NOW ARRIVING	LAND WEST OF SPRINGVALE ISLAND, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0QL
19/12/2021 23:27:42	004109- 19122021	CAR CRUISING	LV04CZE 2 CARS RACING EACH OTHER ONE IS A WHITE VW GOLF SECOND IS A BLUE SUBURU RACING EACH OTHER AT 70MPH	Jct Birmingham New Road - Parkfield Road, BIRMINGHAM NEW ROAD, WOLVERHAMPTON, WV4 6EH
26/12/2021 20:33:55	002763- 26122021	Car cruising	Inbetween the b&q and the car garage and there is a lot of cars parked up and car crusing with a lot of young people hanging around	Jct Black Country Route - Springvale Way, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0QL
15/01/2022 21:52:10	003835- 15012022	BOY RACERS - OP HERCULES	80-100 VEHICLES ON THE BLACK COUNTRY ROUTTE SEEM TO BE RAICING	Jct Black Country Route - Springvale Way, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0QL
15/01/2022 22:04:07	003886- 15012022	TRAFFIC DISRUPTION	THERE ARE 40 TO 50 CARS ALL LINED UP - THESE ARE BOY RACING THEY ARE CAUSING TRAFFIC ISSUES, THERE ARE PEOPLE RUNNING IN THE TRAFFIC CALLER IS JUST BY THE MECCA BINGO BILSTON, NEAR THE B&Q	J A G, SPRINGVALE INDUSTRIAL PARK, UNION STREET, ETtingshall, WOLVERHAMPTON, WV14 0GL
15/01/2022 22:04:13	003887- 15012022	IN REFERENCE TO 3835-150122	CALLER WANTED TO GIVE A VRM FOR A VEHICLE RACING. CALLER SAID HE BELIEVES HIS NEIGHBOUR WAS PARTICIPATING IN THE RACE BUT COULDN'T CONFIRM THE VRM. HE SAID HE KNOWS THE ADDRESS OF THE MALE. 36 WV14 9BH AS THE MALE IS HIS NEIGHBOUR	Jct Black Country Route - Springvale Way, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0QL
15/01/2022 22:08:57	003906- 15012022	DISORDER	LOAD OF BOY RACERS CANNOT GET OUT OF THE CAR PARK AT THE BINGO HALL. THERE ARE OVER 100 CARS THERE ARE LOTS OF CARS IN CAR PARK THAT CANNOT LEAVE DUE TO BOY RACERS. THEY ARE ALL BY HALFORDS.	MECCA BINGO CLUB, MECCA BINGO CLUB, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
22/01/2022 22:51:18	003745- 22012022	Boy racers on the A463	Boy racers on the A463- One of the staff have almost gotten wiped out when trying to leave their site. Caller has no further details. Sent for obs.	MECCA BINGO CLUB, MECCA BINGO CLUB, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
30/01/2022 21:57:08	003721- 30012022	RACING & CAR CRUISING.	-	SPRINGVALE WAY, WOLVERHAMPTON,
30/01/2022 22:03:26	003739- 30012022	BOY RACERS ABOUT 10 CARS AT THE MOMENT	RACING UP AND DOWN CALLER IS MANAGER AT MECCA BINGO AND SAYS THEY ARE RACING UP AND DOWN VERY DANGEROUSLY TOO QUICK TO SEE VRMS	CCTV EQUIPMENT ON ISLAND WITH BLACK COUNTRY ROUTE, COSELEY ROAD, WOLVERHAMPTON, WV14 0RH
30/01/2022 22:05:20	003747- 30012022	Boy Racers - Black Country Route	100s of cars racing - going up and down carriageway wrong way - causing total chaos -traffic at a standstill	TANK 82M FROM MATALAN RETAIL LTD, SPRINGVALE INDUSTRIAL PARK, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
30/01/2022 22:09:08	003761- 30012022	we are at mecca bingo	boy racers - i believe theres 50 of them - racing up & down the road - we cant get out of the mecca - this happened yesterday also	J A G, SPRINGVALE INDUSTRIAL PARK, UNION STREET, ETtingshall, WOLVERHAMPTON, WV14 0GL

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30/01/2022 22:11:08	003768- 30012022	100+ boy racers	Elizabeth arms- boy racers outside again, 100 cars racing. i am stuck on the car park and i can't move	THE ELISABETH ARMS, THE ELIZABETH ARMS PUBLIC HOUSE, OVERFIELD DRIVE, WOLVERHAMPTON, WV14 9XW
30/01/2022 22:11:20	003770- 30012022	BOY RACERS - BLOCKING ENTRANCE TO INDUSTRIAL PARK	20 VEHICLES BLOCKING THE ENTRANCE TO THE INDUSTRIAL SITE. THEY ARE RACING ON THE BLACK COUNTRY ROUTE.	SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
26/02/2022 23:01:45	004142- 26022022	BOY RACERS	APPROX 20 PLUS AT THE MOMENT UP AND DOWN THE BLACK COUNTRY ROUTE	SPRINGVALE WAY, WOLVERHAMPTON,
26/02/2022 23:04:29	004151- 26022022	BOY RACERS	APPROX 16 CARS AND PEOPLE STANDING ON THE TOP OF CARS --	THE ELISABETH ARMS, THE ELIZABETH ARMS PUBLIC HOUSE, OVERFIELD DRIVE, WOLVERHAMPTON, WV14 9XW
26/02/2022 23:05:44	004158- 26022022	STREET RACERS	CALLER SAW AROUND 20 CARS LOOKING LIKE THEY WERE ABOUT TO RACE AND THEY WERE BLOCKING OFF THE ROAD, SAW SEVERAL OF THEM OUT OF THE CARS FILMING.	OVERFIELD DRIVE, WOLVERHAMPTON, WV14 9XP
26/02/2022 23:06:35	004161- 26022022	CAR RACERS	About 20 cars - log 4142-260222	[outside of] B AND Q DEPOT, SPRINGVALE BUSINESS PARK, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QT
26/02/2022 23:12:04	004182- 26022022	boy racers	boy racers on the island, by my work place, driving wrong side of the road, racing around, i have been stuck on the island for 30 mins, i have been at work since 11:30 this morning , and need to get home.	SPRINGVALE WAY, WOLVERHAMPTON,
06/03/2022 22:36:18	003874- 06032022	BOY RACERS - OP HERCULES	boy racers in area anti social driving and causing a nuisance	Jct Black Country Route - Springvale Way, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 0QL
19/03/2022 21:54:18	003956- 19032022	BOY RACERS HAVE BLOCKED THE ROAD OFF.	THERES ALSO ALOT OF PEOPLE. LOTS OF CARS WHO ARE STUCK DRIVING DOWN THE WRONG SIDE OF THE CARRIAGEWAY TO GET OUT.	SPRINGVALE AVENUE, WOLVERHAMPTON,
19/03/2022 21:54:44	003958- 19032022	boy racers	have blocked the roundabout and caller is not able to go. caller is taxi driver has 2 passengers and they are getting worried. he has nowhere to go. the racers are parked in the middle of the road and walk on the road	Jct Springvale Way - Black Country Route, SPRINGVALE WAY, WOLVERHAMPTON, WV14 0QL
19/03/2022 21:54:46	003959- 19032022	BLACK COUNTRY ROUTE BLOCKED OFF BY BOYRACERS	BOY RACERS HAVE BLOCKED OFF PART OF THE BLACK COUNTRY ROUTE AT SPRINGVALE WAY AND ARE STREET RACING.....ABOUT 60 OF THEM. WHILST ON THE CALL CALLER SAID POLICE HAD TURNED UP. LOGS 3958 & 3956 REFERS.	SPRINGVALE WAY, WOLVERHAMPTON,
10/06/2020 19:30:11	004074- 10062020	VEHICLE HAS NO INSURANCE ETC	HAS BEEN SEEN RACING AROUND THE AREA ABOVE	Jct Childs Avenue - Woodcross Lane, CHILDS AVENUE, WOLVERHAMPTON, WV14 9RX
21/06/2020 22:03:33	003922- 21062020	i called earlier reporting cars racing.	log 3913 refers	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
05/07/2020 21:45:13	004098- 05072020	RACING ON A463	ABOUT 20 CARS PARKED ON SIDE OF ROAD GOING NORTHBOUND BETWEEN 6 AND 8 CARS RACING BY THE INDUSTRIAL ESTATE ISLAND LOG 4095-050720 REFERS	ANCHOR LANE, WOLVERHAMPTON,

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05/07/2020 21:54:11	004139- 05072020	VEHICLE DRAG RACING -	BOY RACERS RACING UP AND DOWN THE ROUTE	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
18/07/2020 19:29:20	003938- 18072020	ABS	Excessive speeding late evening and late at night on Dovedale Road. It has become a raceway for for "Boy Racers" I have complained to the council but they have basically ignored the situation by saying they don't have a problem?? - Then I suggest putting a police patrol car halfway along the road (hidden) at "RANDOM LATE Hours - between 18:00 & 22:00 hrs to witness what is going on!!!	143 DOVEDALE ROAD, WOLVERHAMPTON, WV4 6RE
07/08/2020 23:48:07	005312- 07082020	WEBCHAT - STREET RACING	"along the black country route Bilston Wolverhampton, there were a huge number of cars more than 20, this was 15 minutes now, it looked like they were getting ready to drag race By the B&Q island"	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
08/08/2020 22:40:22	004952- 08082020	boy racers	boy racers are out . caller sitting in his garden and he can hear the exhaust reving	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
14/08/2020 23:10:40	005117- 14082020	CARS RACING BY MORRISONS	-	[poundland] BLACK COUNTRY ROUTE, WOLVERHAMPTON,
14/08/2020 23:13:41	005134- 14082020	street racing - group of 100 people with 7/8 cars parked up	by poundland parked up along the road at least 100 gathering 1 car is a navy blue car with yellow decal - make model vrm unk it is gearing up to race with another vehicle	[poundland] BLACK COUNTRY ROUTE, WOLVERHAMPTON,
29/08/2020 00:30:33	000086- 29082020	BOY RACERS	RACING AROUND THE AREA...NEAR TO SPRINGVALE IND ESTATE. UNSURE HOW MANY VEHICLES - OUR DRIVER JUST STATED QUITE A FEW	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
29/08/2020 00:34:36	000103- 29082020	RACING	10 CARS APPROX. RACING AROUND THE ISLAND AND UP PAST THE FIRE STATION. THIS HAS BEEN GOING ON SINCE AROUND 2330.	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
30/08/2020 01:47:39	000290- 30082020	CALLER REPORTING STREET RACERS UPDATING LOG 15 OP HERCULES	50 - 100 CARS RACING UP AND DOWN AND ROUND THE ROUNDABOUTS CUTTING DRIVERS UP OUT OF CONTROL	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
16/10/2020 22:31:09	005048- 16102020	BOY RACERS ON THE BLACK COUNTRY ROUTE	THIS IS ON THE BLACK COUNTRY ROUTE, CAN HEAR THE CARS RACING WHILST ON THE CAR	MEADOW LANE, LANESFIELD, WOLVERHAMPTON,
20/10/2020 08:22:02	000665- 20102020	HIGHWAY DISRUPTION	CALLERS GRANDPARENTS HAVE BEEN CONTACTED TO STATE CALLER HAS BEEN PROSECUTED FOR STREET RACING ON SUNDAY 18/10/20 ,IN HER VEHICLE YH19YDT.VEHICLE CHECKED PNC NO MARKERS ,CALLER NOT IN AREA ON DATE ,CALLER HAS CHECKED WITH STAFFS NO RECORD AND NO RECORD IN WMP .BELIEVE CALLER AND GRANDPARENTS SUBJECT OF A PRANK CALL ,CAR REGISTERED AND INSURED TO CALLER IN RUGELY STAFFS .CALLER ADVISED AND GIVEN LOG NUMBER	BLACK COUNTRY ROUTE, WOLVERHAMPTON,

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01/11/2020 00:48:21	000202- 01112020	CARS GATHERED - RACING	THIS IS BY B&Q - CALLER STATES THERE ARE LOADS OF CARS	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
28/11/2020 16:44:35	002671- 28112020	TARGETING BOY RACERS	UNTIL 2300	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
29/11/2020 21:59:18	003612- 29112020	BOY RACERS	THEY ARE PARKED INTO ANCHOR LANE THERE ARE ABOUT 50 CARS RACING ON THE BLACK COUNTRY ROUTE AND ONTO THE BIRMINGHAM NEW ROAD	ANCHOR LANE, WOLVERHAMPTON,
30/11/2020 17:58:18	003613- 30112020	CONSTANT ASB AND CRIMINAL DAMAGE	CALLER STATING THAT HER UPSTAIRS NEIGHBOURS AT CHAMBERS RACING/MOTORCROSS ARE CONSTANT CAUSE OF ASB, AND THEY HAVE CAUSED DAMAGE TO HER CAR AS A RESULT OF TODAYS EVENTS	6A JOHNSON STREET, LANESFIELD, WOLVERHAMPTON, WV14 9RL
15/02/2021 11:27:49	001255- 15022021	MISSING - GARETH ROBERTS - 02/11/1984.	LAST SEEN AT 1950 YESTERDAY LEFT ON A WHITE RACING BIKE	1A FOSTER AVENUE, WOLVERHAMPTON, WV14 9PT
17/02/2021 20:40:31	003727- 17022021	road related offence	car outside where we live racing up and down silver picasso, looks like kids in the car, no vrm.	HESSIAN CLOSE, WOLVERHAMPTON, WV14 9PL
03/03/2021 20:33:03	004045- 03032021	DANGEROUS DRIVING	I just wanted to report suspicious / dangerous vehicles travelling in tandem or racing approx 5. Mins ago they were travelling at high speed on residential road on wrong side, overtaking one another and wrong side of bollards	Jct Dovedale Road - Wolverhampton Road East, DOVEDALE ROAD, WOLVERHAMPTON, WV4 6AS
28/03/2021 22:10:18	003383- 28032021	BOY RACERS- RACING UP AND DOWN THE ROAD	UNKNOWN AMOUNT OF VEHICLES, CALLER IS IN BED AND CAN HEAR IT HAPPENING, STATES THIS IS AN ON GOING ISSUE	BIRMINGHAM NEW ROAD, DUDLEY, WV14 9PW
28/03/2021 22:15:14	003395- 28032021	boy racers approx 100	added to 3345	-
10/04/2021 22:57:16	003792- 10042021	VEHICLES RACING	-	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
25/04/2021 17:47:49	002807- 25042021	cars racing - near mis	Honda civic grey with lime green , ic4 males inside are racing grey audi rs 4 and audi a4 all grey. they have passed the tesco heading towards the Aldi . No vrms known	BIRMINGHAM NEW ROAD, DUDLEY,
05/06/2021 20:16:24	003754- 05062021	asb-cars speeding	i would like to report street racing of about 5 cars ten minutes ago on birmingham new road facing towards dudley they was racing at over 50 mph maybe more they had no concern for safety for others on the road	112 BIRMINGHAM NEW ROAD, WOLVERHAMPTON, WV4 6NY
17/07/2021 23:22:15	003790- 17072021	boy racers	multiple vehicles racing up and down black country route/ bham new road	Jct Birmingham New Road - Black Country Route, BIRMINGHAM NEW ROAD, WOLVERHAMPTON, WV14 9PW
13/08/2021 00:17:01	000047- 13082021	WRECKLESS DRIVING 2 MINS AGO	2 CARS DRIVING REALLY WRECKLESSLY AND WENT THROUGH REDS AND ONTO WRONG SIDE OF ROAD. LOOKED LIKE THEY WERE RACING/GETTING AWAY SILVER PEUGOET VAN BLACK BMW FROM DUDLEY NORTHBOUND HAPPENED 2 MINS AGO	BIRMINGHAM NEW ROAD, DUDLEY,

Signature

Signature witnessed by

Crime No. URN Statement of **Lee Plant**

24/10/2021 22:27:33	003657- 24102021	NEAR TO ISLAND BY B&Q	AROUND 100 PEOPLE THERE, BOY RACERS.. CALLER THINKS THEY ARE JUST SETTING UP. TWO CARS WENT SPEEDING PAST AT HIGH SPEED	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
31/10/2021 22:52:02	004303- 31102021	30 CARS BOYRACING	THEY ARE ALL PARKING ONTO THE ROUND ABOUT - THEY ARE BLOCKING THE HALFORDS ROUND ABOUT COMPLETLET	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
31/10/2021 22:54:04	004311- 31102021	STREET RACING IN PROGRESS - 200 CARS PLUS	DRIVING DANGEROUSLY -	SPRING ROAD, WOLVERHAMPTON,
06/11/2021 22:52:11	004447- 06112021	boys racers. racing up the dual carriageway (d)	10-12 vehicles. call dropped. tried calling back but lines busy.	Jct Birmingham New Road - Black Country Route, BIRMINGHAM NEW ROAD, WOLVERHAMPTON, WV14 9PW
06/11/2021 22:59:03	004468- 06112021	BOY RACERS	RE: 4447-061121	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
06/11/2021 23:12:54	004521- 06112021	ASB - POTENTIAL CAR CRUISING	REPORTING A LOT OF CARS GATHERING, BY THE TIP AND THE B&Q ALSO THEY ARE PARKING ON MEADOW LANE, THIS IS A NON CRUISING AREA AND I THINK THERE IS GOING TO BE CAR CRUISING TAKING PLACE	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
06/11/2021 23:13:46	004524- 06112021	(D) Car cruising - Op Hercules	car cruising	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
21/11/2021 22:09:37	003739- 21112021	100 CARS RACING	A463 BLACK COUNTRY BLACK COUNTRY ROUTE BETWEEN BILSTON AND WALSALL OVER 100 CARS	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
19/12/2021 23:04:54	004049- 19122021	Street racing	30 - 50 cars, blocking off the road	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
27/12/2021 23:06:33	003960- 27122021	racing.	caller reporting kids 15-16 years racing up and down street in cars cloned up plates, its happening now 70-80 mph, lots of crime around here. white alfa romeo, they have balaclavas cant get vrm i cant go out have 4 kids here.	CHILDS AVENUE, WOLVERHAMPTON, WV14 9UY
15/01/2022 21:47:14	003819- 15012022	BOY RACERS	BOY RACERS RACING UP AND DOWN THE BIRMINGHAM NEW ROAD. THERE ASRE CROWDS OF PEOPLE ON PAVEMENT SPECTATING.	BIRMINGHAM NEW ROAD, DUDLEY, WV14 9PW
15/01/2022 21:49:54	003827- 15012022	CARS RACING - OP HERCULES	FEMLAIE SAID LOADS OF CARS RACING ON THE BLACK COUNTRY ROUTE , SHE SAID OVER 100S OF PEOPLE THERE	Jct Black Country Route - Anchor Lane, BLACK COUNTRY ROUTE, WOLVERHAMPTON, WV14 9NE
15/01/2022 21:52:32	003838- 15012022	CARS RACING ON BLACK COUNTRY ROUTE.	LOG 3827 REFERS.	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
30/01/2022 22:27:14	003813- 30012022	Op Hercules Boy Racers	Boy racers on the black country route by bnq Bilston, it's been going on for the past 30 minutes, I'm sick of reporting this. It's like being next to the grand Prix, when will something be done to permanently stop this? It happens nearly every weekend mainly Sunday nights , and tonight is unreal	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
06/03/2022 22:32:04	003860- 06032022	boy racers	near to b & q	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
06/03/2022 22:36:25	003875- 06032022	Sounds of vehicles racing	POSS RACING	28 BATE STREET, WOLVERHAMPTON, WV4 6NL

Signature

Signature witnessed by

OFFICIAL – (when complete)

MG11

Crime No.

URN

Statement of Lee Plant

19/03/2022 21:47:27	003935- 19032022	boy racers apprx 40 cars	near halfords cars racing up and down towards halfords and b&q happening right now	BLACK COUNTRY ROUTE, WOLVERHAMPTON,
24/03/2022 20:47:42	003937- 24032022	cars racing x 2	between coseley and black country museum turning . they have now left vrm HN15 RFY white vw Touareg.caller has no dash cam . no evidence so this would not go to court	BIRMINGHAM NEW ROAD, DUDLEY,

Signature

Signature witnessed by

03/2016

OFFICIAL – (when complete)

Witness contact details

URN : / /

Name of witness: Mr/Mrs/Ms/Miss/Dr

Former name

Email address:**Email address needed for correspondence i.e. support material to be sent**

Address

Postcode:

Preferred telephone number:

Alternate telephone number:

Agreed means of contact and frequency :

Gender

Date and place of birth

Ethnicity Code (16+1)

DATES OF WITNESS NON-AVAILABILITY: (12 months)**Witness care**

Does the witness require a Special Measures Assessment as a vulnerable or intimidated witness? (*youth under 18; witness with mental disorder, learning or physical disability; or witness in fear of giving evidence or witness is the complainant in a sexual offence case. ALSO crimes involving gun and knife crimes and victims of Modern Slavery Act 2015*)

Yes ☐ No ☐ If 'Yes', submit **MG2** with file in NGAP, contested or indictable only cases OR to read VPS in GAP cases.

Witness Consent (for witness completion)

- | | | | |
|---|------------------------------|-----------------------------|------------------------------|
| a) I am aware that I may have to attend court. | Yes <input type="checkbox"/> | | |
| b) I have been given the Victims' leaflet with the crime number on . | Yes <input type="checkbox"/> | No <input type="checkbox"/> | |
| c) The Victim Personal Statement scheme (victims only) has been offered to me. | Yes <input type="checkbox"/> | No <input type="checkbox"/> | |
| d) It has been explained to me what will happen next with this investigation | Yes <input type="checkbox"/> | No <input type="checkbox"/> | |
| e) I consent to police having access to my medical record(s) in relation to this matter (<i>obtained in accordance with local practice</i>) | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| f) I consent to the statement being disclosed for the purposes of civil proceedings if applicable, e.g. child care proceedings, CICA, CLPD. | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| g) Child witness cases only. I have had the provision regarding reporting restrictions explained to me. | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| I would like the CPS to apply for reporting restrictions on my behalf. | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

- *I understand that the information recorded above will be passed on to the Witness Service, which offers help and support to witnesses pre-trial and at court.*
- *I understand that my details may be passed to other agencies who can offer me help and support in relation to being a victim of this crime.*

I give my informed and explicit consent for my personal details to be passed to other agencies that can support me or are involved in the criminal justice process. Yes ☐ No ☐

Signature..... Date

Parent/guardian signature..... Date

Address

Contact tel no

Supporter signature..... Date

Statement taken by (*print name*):

Station:

Time and place statement taken:

Signature Signature witnessed by

Statement filed on behalf of: Dudley MBC
Statement of: J Edwards
Statement No:
Dated :
Exhibits :
Filed:

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

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

**WITNESS STATEMENT OF
PC 0544 JONATHAN EDWARDS**

I, PC 0544 JONATHAN EDWARDS, of West Midlands Police, will say as follows:-

1. I am employed as a Police Constable with West Midlands Police. Since October 2018, my role has been as an ASB officer based in the Partnerships Team at Brierley Hill Police Station.

2. Operation Hercules, the police operation to monitor car cruising activities in the Dudley Borough is ongoing. The lead officer (Silver Commander) responsible for Operation Hercules is Chief Superintendent Ian Green .
3. On checking the Command and Control system for logs relating to vehicles and anti-social behaviour for the past 6 months, there appears to be a few 'hotspots' for these activities in the Dudley Borough and these are Manor Way, Halesowen, Tesco car park, Castle-Gate, Dudley and Waterfront, Merry Hill, Dudley.
4. Between 23rd October 2021 and 10th April 2022 there are **37** logs which make reference to vehicles and include an element of anti-social behaviour, e.g. excess speed, racing, aggressive driving, or revving engines. Some of these logs relate to the same incident reported by numerous people. To assist the court I have provided a brief summary of the Control Works logs for the period 23rd October 2021 to 10th April 2022 below : -

Date	Log No.	Location	Details
21-10-21 17.30	3172 & 3192	Bromsgrove Rd, Halesowen	Car racing, gone towards Manor Way Roundabout – swerving, speeding. Almost 8 cars at least. No vehicle details as driving too fast. Almost 10 cars now, 4 hours ago called saw a car – looked like drive was holding a knife/machette and hanging out of the car at the same time. Racers have hazards on.

01-11-21 19.46	3992	Showcase Cinema, Dudley	Boy racers - doing donuts in the car park, driving at high speed now sped off. Black BMW 1 series PX17 ***
03-11-21 20.09	3686	Waterfront Way car park, Brierley Hill	Boy racers - 6 Cars – They are driving erratically. – They are doing wheel spins. Caller can't see any of the VRMs. Caller said the occasional walker passes through the car park. Doesn't appear to be in use. They have been there roughly an hour. PC <u>23631</u> has attended location. No sign of disturbance or vehicles doing donuts. There were <u>2</u> vehicles parked and a scooter. I spoke with <u>2</u> males within the vehicle who were polite and claimed not to have seen anybody doing any donuts on the car park/ claimed not to have done any donuts themselves.
13-11-21 21.13	3700 & 3343	Shell Filling Station, Manor Way, Halesowen	Cars gathering for racing – Op Hercules – Can see 25 cars. Looks like they are getting ready to race.
20-11-21 19.21	3492	Copthorn Hotel Car Park, Brierley Hill	10 cars on the upper car park doing donuts and racing all over the car park. They have been there for over 30 minutes. More coming and gathering. Honda Civic, higher power cars, Vauxhall Corsa. Can't see VRMs
27-11-21 18.12	2775	Showcase Cinema, Dudley	4 cars reported to be driving round the car park recklessly. The car park is icy, they are drifting amongst parked cars. Now 5 cars. grey audi, white corsa, black vw golf - they are spinning on the ice on the car park. Caller cannot get any vrm numbers, but from start of call it has increased from <u>3</u> cars to <u>5</u> cars, they seem to be parked up in a group, on the rear car park, to the right by the middle. All have headlights on their cars, seem to be taking it in turn to pull out and spin.

29-11-21 22.50	4236	Manor Way, Halesowen	There is illegal street racing going on on the A456 Halesowen bypass, 10:51pm. Sounds like a race track, this is a common occurrence for the area. Starts at Manor Way and heads up past the golf range towards Hagley / Stourbridge, no description of vehicles as I am in my house can hear it with windows shut. Been going on for a while now
30-11-21 22.46	4445	Stourbridge Ring Road	Boy racers revving up constantly. Constant issue, no vehicle details/number of vehicles. They rev up causing noise nuisance.
14-12-21 22.22	4467	Tesco Extra, Castle Gate, Dudley	30 cars racing in the underground car park. Green Range Rover driving round in the underground car park and two females on the bonnet and another on the roof. There are 30 cars in total. This is a regular thing. The cars are speeding around. Caller has spoken to Security and it is nothing to do with them. Caller stated that the police have attended before and got rid of them. They are all parked up but caller is worried someone will get killed. Drivers all from the age of 17 – 25 years old, mostly white males and girls.
28-12-21 21.24 & 21.25	3421 & 3424	Manor Way, Halesowen	Group of at least 20 boy racers - congregating on the Black Horse and Shell petrol station - racing approx 12 cars and spectators. Happened for at least 30mins
30-12-21 01.31	201	Manor Lane (Way) Halesowen	Boy racers – sounds like a lot. They are all sat waiting to race. Could hear some engines in the background. This happens often. It stopped for a while as police stopped them. Can hear more engines in the background. Caller can't see the cars but can hear them, they keep just going up and down the carriageway.

05-01-22 15.48	2485	M5, Junction 3 to Junction 4, Dudley	Dangerous driving/racing M5. There is brand new Honda Jazz that has come past at 107 mph, he is swerving all over the place and is racing another black Honda Jazz going north past junction 3. Now the vehicles have gone off the motorway, going onto the A456. They are 21 plates, racing each other, Honda Jazz x 2
07-01-22 19.27	3336	Multistorey Car Park, Pool Road, Halesowen	Boy racers in the car park.
29-01-22 00.39	134	Grazebrook Road, Dudley	Boy racers. Vehicles involved are a white vehicle with a black roof, silver 1 series BMW BOYRACERS -
31-01-22 22.54	4524	Pedmore Road, Dudley	Street racing – live up the rounds from Merry Hill Shopping Centre. For the last few nights there has been lots of drivers racing up and down the Pedmore Road. They are really loud. This is on the dual carriageway from Russells Hall Hospital up to Merry Hill Shopping Centre, it is the A4036 that they are racing up and down. This is an ongoing issue. They have been doing this the last few nights. Has been going in for the last hour. They have gone quiet now but called said that they will start up again. No VRMs for the vehicles as caller lives high up and just hear this from where she is. Loud exhausts and cars spitting, driving dangerously and fast up the dual carriageway.
03-02-22	4304	Car Park, Waterfront West, Brierley Hill	Joy riders being aggressive to staff There is a large gathering of a dozen plus cars, staff have approached the people and they are refusing to leave, they have been making threats and driver is scared to leave the vehicle. Joy riders are making threats to harm

			staff member who is now too scared to get out of his vehicle. I have asked exactly what is being said but they can't say specific due to being on an insecure line. Just said these people are being abusive and threatening and staff are scared to get out of their vehicles. Caller said that he had told them to move off and the offender was getting a baseball bat or bar out of the car and they had driven off.
17-02-22 20.43	4021	Car Park, Waterfront West, Brierley Hill	Group of children racing around car park in progress. Audi and a silver Golf. Nearly got into accidents, seem to be drag racing. Group of about 6-7 lads drag racing and doing donuts.
24-02-22 23.00	4240	Showcase Cinema, Dudley	Wheel spinning and donuts every night. Caller is in Tipton and he has stated that this is every night around this time until 1.00am. Caller can't see how many cars. He is in bed and it is the only place it can be coming from. He has stated that they do this on the Tesco car park too.
24-02-22 14.50	2457	Tesco Extra, Castle Gate, Dudley	Ongoing ASB in Tesco car park every evening - Cars speeding around, car park smells of drugs being smoked. This very frightening for customers visiting car parks. The store don't seem to take any notice It's just being used as soil gatherings they did put barrier down but don't seem to bother
28-02-22	3866	Waterfront Way, Brierley Hill	Around 15 cars racing on the car park. Caller is from the ambulance service and has just drove past. Caller states there is around 15 vehicles racing around and doing "donuts" on the car park. Caller is concerned it will cause an accident. No specific vehicle details known
02-03-22 21.53	4120	Waterfront Way, Brierley Hill	Boy Racer vehicle advised - Officer in half blues spoke with driver with regard to driving behaviour. - Sgt Treacy - Drove to Waterfront Car Park due to ongoing issues with Boy Racers and anti-social driving together with a fight involving weapons last week.

			<p>Parked in the large car park at the rear of the Waterfront. Whilst parked up, observed several vehicles driving in an anti-social manner such as driving at inappropriate speeds and also doing 'donuts' (ie wheel spinning and sending the vehicle out of control in a skid in a circle). I had warned three other vehicles and asked them to leave - they were compliant and obliging and did so. I observed one such further vehicle a BMW 116 YD19 RRF in grey performing several donuts at the busy end of the car park near to the walkways to the restaurants and pubs. I was in 'half blues' ie police trousers and police black shirt with a black gilet on so as not to draw attention. I was driving a plain police vehicle. I approached that vehicle in my vehicle which immediately drove away. The occupants would not have been able to identify me as a Police Officer. As the vehicle exited the car park I caused the vehicle to stop and spoke to the driver. I asked his name and whether the vehicle was his - he gave his name as Sam and his last name which I cannot remember. He said his vehicle belonged to the passenger and that he was fully insured. He was obliging and respectful initially. I pointed out that his behaviour would constitute an offence of driving without due care which can occur in a public place. He said he thought the car park was private. I was merely going to give him advice as I didn't think it was fair to report him and only advise others. I pointed out that I could place a Section 59 Police Reform Act warning on him and his vehicle. He said that I could not without paperwork - however verbal warnings can be issued initially. He then said that he would simply change his vehicle and put his private plates on. I pointed out that</p>
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			the warning rests upon him and the vehicle both for 12mths. I also said that I could get a copy of the video of the car park from the security and could report him to court. He said do that then. I then re parked my vehicle and asked for his details once again which he then refused to provide as he had already given them to me, which in truth he had already done so, but I had not written them down. I was not a position in half blues to report him for any offence. I pointed out that we got constant complaints about the activity on this car park. The driver drove away but has complied with all asked of him. No further action at this time. Log created for info only and can be closed with thanks.
07-03-22 21.36	3950	Tesco Express Castle Gate Dudley	4-5 cars driving 60mph around the Tesco car park, near missing pedestrians. Two vehicles identified as: a Silver Astra van, white Ford Fiesta, both with blacked out windows, no vrms. - Left the car park in the direction of The Broadway.
07-03-22 22.10	4077	Tesco Express Castle Gate Dudley	ASB, boy racers. Caller stated there is a car meet at the location. Approx 15 cars there at present at the rear of the car park. They were doing hand brake turns/sliding. Are now parke dup revving their engines. No VRMs, all different cars.
08-03-22 17.41	3285	Wallows Road, Brockmoor	- 2 Motorcycles racing around using the street as a race track, trying to goad officers into chasing them.
09-03-22 22.01	4345	Tesco Extra Castle Gate Dudley	ASB – boy racers. I've just been to Burnt Tree Island Tesco. Not sure what's going on but there are 30 young lads with cars zooming up and down the car park. Caller can smell them smoking. On attendance there were three or four separate groups of vehicles, around 30 in total. All vrms have been taken down. All vehicles were stationary and not being driven in any ASB manner. All occupants

			<p>were spoken to and have left the location while we were present. no s.59 warnings given as no signs of vehicles driving erratically on our presence and the log does not state any particular vehicles involved. The callers phone was ringing out and Tesco had shut the shop early so we could not speak to any staff for further accounts. an intel log will be created for the vehicles involved and local npt informed. there was mention of possible windows being hit with trolleys in a linked log but no signs of criminal damage witnessed by us on attendance. log to be closed please.</p>
12-03-22 20.20	3435	Milton Street, Pensnett	Cars racing round estate - There are cars racing round the estate as if it's race track tyres squealing The cars are not there now they usually come later
13-03-22 00.22	63	Manor Way, Halesowen	Boy racers - they have turned up in the last 10minutes caller believes. Sounds quite noisy - sounds more than usual, the one with the gun shot exhaust is there.
21-03-22 20.00	3694	Mill Race Lane, Stourbridge	Reckless driving. Just seen my mate Adi in a silver/grey Seat, partial VRM DV58 on McDonalds car park. He has just made off at speed down Mill Race Lane in convoy with another vehicle - VRM LT59VKU. Open shout – nothing heard
01-04-22 10.26	979	Westland Gardens, Amblecote	Ongoing ASB with boy racers over weekends. Large amount of noisy vehicles driving erratically. Ongoing issues
01-04-22 22.38	4320	Andrew Road, Halesowen	Boy racers on car park pretending to run each other over. X 3 vehicles, 4 persons racing up and down. Cars pretending to run each other over, shouting/beeping and generally being a nuisance. When they are pretending to run each other over, one is standing in front of car whilst the car speeds at them before stopping suddenly. Risk of actual RTC. Cannot see

			VRMs., thinks one of them is an SUV but not certain.
06-04-22 21.49	4038	Tesco Extra The Crown Centre Stourbridge	Boy racers on the car park – only 3 cars but we did have 9 cars about 40 mins ago. The cars are driving around the multistorey car park – white Fiesta SG60 CHY, gold Mini BV58 ZRU, other car was a Seat Ibiza SX07 TXX
08-04-22 23.36	4319 4328 4372	Manor Way, Halesowen	Boy racers - boy racers driving up and down the last 10 mins . driving at speed. Further call log about the boy racers on Manor Way Further call log reporting same
10-04-22 12.29	1572	Oak Green, Dudley	8 Bikes racing – potential RTC, reporting 8 motorcycles racing up road, has said that he thinks they are hitting/have hit a car but has not provided further details
10-04-22 22.02	2803	Flood Street Island, Dudley	Boy racers, about 50 vehicles, unknown how long, going about 70/80 mph
10-04-22 22.32 22.34	3866 3875	Manor Way Halesowen	Boy racers – drag racing, taking place on both sides of the carriageway Boy racers/op Hercules – 20 or 30 cars racing up and down the road, loads of them. Started again on Friday Loads here tonight.

7. Officers from West Midlands Police carry out dedicated Operation Hercules Patrols in the Dudley NPU area in response to multiple complaints of street racing. These are robustly managed by the

respective Neighbourhood Teams for Halesowen, Dudley and Brierley Hill with Pro-active Management Plans which are regularly updated with logs of note, patrols and positive action. All of these plans are currently live and up to date.

8. The injunction is required to protect law abiding members of the public and businesses who have suffered for many years from the negative impact of car cruising. I believe it is vital that strong action is taken to prevent car cruises taking place and to deter those who are considering taking part in this activity. Since the injunction lapsed at the end of January 2021, reports of car cruise activities in the Dudley borough have increased and I believe they will continue to do so unless the order is renewed.
9. For the above reasons I fully support the extension of this Injunction within Dudley and the Black Country.

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.

Name of Claimant: Dudley Metropolitan Borough Council

Signed

 PC 0544

Date

12/05/22

Print name in full JONATHAN EDWARDS

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

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

WITNESS STATEMENT OF SERGEANT RICHARD PHILLIPS

I, Sergeant Richard Phillips, WILL SAY AS FOLLOWS:

1. I am Richard Phillips, a Police Sergeant with West Midlands Police. I presently have responsibility as the second in command for Neighbourhood Policing in North Sandwell. This incorporates the towns of West Bromwich, Wednesbury and Tipton. Since 2018 I have had responsibility for policing street racing in both the Black Country and Sandwell. I am now the policing lead (Bronze Commander) for street racing for Sandwell Neighbourhood Policing Unit
2. Operation Hercules is the Police Operation to monitor and pro-actively deal with street racing in Sandwell and the wider West Midlands policing area. The Silver lead with overall responsibility for this operation is Chief Superintendent Ian Green.
3. In my present role at Sandwell I continually monitor calls for service and demand in relation to street racing as well as the main locations for this issue. Whilst they are not the only locations where this activity is reported in Sandwell, the "Hot Spots" have consistently been Kelvin Way and Kendrick Way. Both

roads are arterial roads in West Bromwich and have both residential and business properties in close proximity.

4. I have looked at a snapshot of the demand that has been reported in last 35 days. In my experience this is typical in terms of the volume and nature of the demand experienced at Sandwell over the past few months. During this 35-day period there were 17 incident logs created relevant to street racing or associated Anti-Social Behaviour. To assist the court, I have summarised the controlworks logs from the period 25/05/22-28/06/22 below.

Date	Log	Location	Details
26/06/22	38	KENRICK WAY, WEST BROMWICH	SECOND TIME I AM CALLING VEHICLE ARE RACING ON KENRICK WAY AGO UNSURE OF HOW MANY VEHICLES
19/06/22	3887	KENRICK WAY, WEST BROMWICH	HIGH SPEED RACING I COULD HEAR THEM OVER THE PHONE. CALLER CONCERNED AT THE SPEED THEY ARE DOING SOMONE WILL BE KILLED.
19/06/22	2513	WILTSHIRE WAY, WEST BROMWICH	CARS NOT SHOWING REG PLATES - REMOVED OLD STYLE VAUX CORSA X 2 - RED AND GREEN
12/06/22	152	UPPER CHURCH LANE, TIPTON	MOTORBIKES AND CARS RACING THEY ARE RACING UP AND DOWN THE STREET.
10/06/22	4072	MARIA STREET, WEST BROMWICH	BOY RACERS AT LOCATION - OP HERCULES THREE CARS ON THE CAR PARK AND ANOTHER TWO BLOCKING THE ROAD. FOUR ASIAN MALES WALKING AROUND. FURTHER TWELVE VEHICLES RACING ON THE EXPRESSWAY. NO VRMS
08/06/22	4338	CHURCH HILL, WEDNESBURY	boy racers I am reporting speeding cars going up and down every day, especially around 9:30pm - 11:30pm
05/06/22	3004	KENRICK WAY, WEST BROMWICH	boy racers people recording vehicles racing
05/06/22	2992	KENRICK WAY, WEST BROMWICH	BOY RACERS HEARD ON THE USUAL LOCATION ON KENRICK WAY REGULAR ISSUE BOY RACERS SPEEDING AROUND
05/06/22	2980	KELVIN WAY, WEST BROMWICH	BOY RACERS AT LOCATION APPROX 40 CARS RACING UP AND DOWN DUAL CARRIAGE WAY, MORE CARS ARE TURNING UP AS WE SPEAK, GREEN STREET AND MARIA STREET ARE FLOODED WITH CARS.

04/06/22	284	KELVIN WAY, WEST BROMWICH	6 CARS RACING EACH BOY RACERS
04/06/22	414	KENRICK WAY, WEST BROMWICH	BOY RACERS BACK
02/06/22	4033	KELVIN WAY, WEST BROMWICH	ASB - CARS RACING - 20 CARS AND 8 MOTORBIKES RACING ONTO THE SLIP ROAD AND THE CARPARK AND GREEN STREET - DOING LOOPS FROM SPON LANE ROUNDABOUT AND M5 J1 ROUNDABOUT
01/06/22	4171	KELVIN WAY, WEST BROMWICH	ROAD RACERS ON KELVIN WAY TWO CARS ON CAR PARK AND ABOUT 8 CARS AND ONE MOTORBIKE COULD HEAR ENGINES ROARING ON THE CALL
29/05/22	204	HILL TOP, WEST BROMWICH	3 cars, on car park for 30 mins, racing around, onto the street racing off in several directions, they have been speeding. can hear the cars racing now
28/05/22	2892	KELVIN WAY, WEST BROMWICH	ON KELVIN WAY- AT LEAST 10 CARS. NO VRMS CAS CALLER IS IN A TOWER BLOCK ON THIS LOCATION AND NEARBY MARIA STREET
28/05/22	4134	ST MARKS ROAD, TIPTON	VEHICLES RACING UP AND DOWN THE ROAD VEHICLES DRIVING UP AND DOWN THE ROAD - NEARLY HIT 2 KIDS ON THE SCOOTER. CALLER STATES SHE CAN SEE 8 VEHICLES - NO VRMS - JUST SPOTTED A BLACK AUDI
26/05/22	3919	MARIA STREET, WEST BROMWICH	On Green street and Maria Street between 25-30 cars. people are getting out of the cars and watching them. More vehicles are turning up as caller is speaking to me.

5. Officers from West Midlands Police complete dedicated Operation Hercules patrols in Sandwell. These are both proactive and reactive in nature and are aimed at reducing the instances of reported street racing summarised above. Not only do those engaging in this activity seriously risk their own and other road user's safety, it seriously impacts on the quality of life of local residents. This is primarily due to the excessive noise at the anti-social times this activity takes place.

6. I believe the injunction is needed to help prevent the negative impact of street racing that residents and businesses continue to experience. It is apparent to me that since the previous injunction expired in Jan 2021 the reports of street racing, as well as the numbers engaging in this activity have increased. I believe that a renewed injunction would be crucial in proactively policing this activity as it would deter those who are currently prepared to organise or engage in this activity.
7. For the reasons detailed above I wholeheartedly support the application for renewal of the injunction in Sandwell and the wider Black Country area.

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 29/06/2022

Print name in full RICHARD PHILLIPS

i) Statement of: T/Insp 29944 Philip UPTON
ii) Statement No: 1
iii) For: Claimant
iv) Dated: 09/06/22
v) Exhibits:

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

WITNESS STATEMENT OF Temporary Inspector 29944 Philip Upton

I, T/Insp 29944 Philip Upton, WILL SAY AS FOLLOWS:

1. I am Philip Upton, a Temporary Inspector with West Midlands Police with the lead role for policing the Black Country car cruising issues in WALSALL.
2. I have received data that originates from Chris SQUIRES who is employed as an Intelligence Analyst employed by West Midlands Police and working with the Central Motorway Police Group who focus on the regions roads to make them safer. The data states how many incidents of street racing there have been between April 2020 and March 2022 across DUDLEY, SANDWELL, WALSALL and WOLVERHAMPTON. In terms of WALSALL there were a total of 282 incidents between April and December 2020, 269 incidents between January and December 2021 and 57 incidents between January and March 2022.
3. I have tasked officers from Walsall to obtain statements from concerned members of the public and how street racing incidents have impacted on them.

4. Julia Ann WESTWOOD will state how incidents have affected her in the DARLASTON area of WALSALL. Julia resides approximately 2 miles from the A463 BLACK COUNTRY ROUTE and describes the issues as living next to a motorsport track. In summer Julia can't open her windows due to the sound of high-powered vehicles using it as a racetrack into the early hours. This keeps Julia awake and impacts on their life. Julia believes that by banning car cruising/racing it would ease the blight of noise nuisance and make the roads safer.
5. Lee RODEN will state how incidents have affected him in the DARLASTON/MOXLEY area of WALSALL. Living next to the M6 motorway at junction 10 Lee states that in the summer months he has to keep his windows closed due to the sound of high-powered vehicles using an arterial route as a racetrack into the early hours. This impacts his life and effects his sleep pattern due to the noise. The persons also attend trading estates and retail parks to meet. He states he is aware of a collision in 2018 when a car cruiser collided with an innocent road user. He believes banning cruising would ease the noise and make the roads safer.
6. Simon PEARSON states that in 2020 they had a business in BIRCHILLS and half a dozen vehicles would gather on a bridge. The cars would race at high speed and do doughnuts that would frighten customers. This caused stress to Simon and they were sure one day somebody would be killed.
7. Kelly Matthews resides in a block of flats in WALSALL. Kelly states that since June 2021 they have reported incidents to the Police but nothing gets done. The same 5/6 vehicles race up and down GREEN LANE and rev their engines outside Kelly's address between 1-3am. Kelly suffers with anxiety, depression and panic attacks which make this worse. Both Kelly and their husband do not get any sleep. Kelly states that they drive so fast their will be an accident and that they are clearly racing. Kelly wished that something could be done.
8. Ravdeep KHARA will state that over the last few years the roads of WALSALL have become an unofficial racetrack caused by car cruising and illegal car races on arterial routes. On 28/8/20 on SPRINGHILL ROAD whilst driving with their mother in the vehicle they saw a small motor vehicle travelling at speed and saw he car complete a turn/skid on the Island. Ravdeep thought that they would kill someone or cause damage. Ravdeep supports the banning of car cruising / racing and that the main roads would be safer.
9. Robert NORTON states that the main roads near to their home have become an unofficial race track and the industrial and retail estates have become a

meeting point for the people involved. Most weekend people attend and race their vehicle on the BLACK COUNTRY ROUTE. The cruising starts in WESSONS ROAD and the noise from the vehicles causes them sleep deprivation and can keep them awake into the early house. Robert states it appears the Police do not have the resources to deal with it. Robert supports an order to ban the activities which they believe would ease the blight of noise nuisance and make the roads safer.

Statement of Truth

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

Signed

A handwritten signature in black ink, appearing to be 'Philip Upton', enclosed within a rectangular box.

Date 09/06/22

Print name in full Philip Upton

i) Statement of: T/Insp 29944 Philip UPTON
ii) Statement No: 2
iii) For: Claimant
iv) Dated: 04/09/22
v) Exhibits:

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

CLAIM NO:

B E T W E E N:

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

Claimants

and

PERSONS UNKNOWN

Respondents

WITNESS STATEMENT OF Temporary Inspector 29944 Philip Upton

I, T/Insp 29944 Philip Upton, will say as follows:

1. Further to my statement dated 9/6/22 I have searched control works (West Midlands Police Command and Control) for incidents related to vehicles being used in an antisocial manner relevant to this case and recorded a brief summary in a table below to show the extent of the issues in Walsall. I have made the search parameters between the dates of 1/1/22 and 4/9/22 and using words cars, vehicles and racing to narrow down the large number of incident logs on the system.

Date	Log Number	Location	Brief summary of incident log/nature of call
01/01/22	283	Junction Darlaston road - Bescot Road, Darlaston road, Walsall, WS2 9AA	2 cars racing, sighted by Police 70-80 mph.

01/01/22	4656	Black Country Route, Darlaston, WS2 0BT	Caller reporting large amount of cars gathered and racing upon the black country route. Towards Bilston
03/01/22	3616	Beddows Road, Walsall, WS3 1QF	Caller stating - I've had a lot of harassment at the moment, there's a car with 6/7 youths driving around in a dark ford eco sport. driving erratic" They are doing 40/50mph up streets... there's also in a white ford fiesta no vehicle registration known. "the kid that's driving it is the one who smashed my car windows before".
09/01/22	2699	McDonalds, Bescot Retail Park WS1 4SB	4 cars racing on the car park, people standing around them.
15/01/22	3610	McDonalds, Bescot Retail Park WS1 4SB	Customers complaining about boy racers. On the car park of the retail by the old JTF caller stating there are about more than 10 cars. No issues on Police arrival though.
15/01/22	3897	Island at junction 10	Lots of cars and people on the road racing in and out of the carriageway.
22/01/22	2913	Bescot Retail Park, Bescot Crescent, Walsall, WS1 4SB	Cars meeting. looks like an organised illegal meet. Officers have attended the location as this is a well-known location for car meets. At the moment there is approximately 10-15 cars that are stationary with engines turned off. The group appear to be a family and friends and are just here to have a chat and a

			coffee from McDonalds. They said another group is arriving at 20:00hrs and then at 21:00hrs it will be decided where the main meeting will be. At this time there is no disorder and no ASB whilst officers were in attendance.
27/01/22	3673	Junction Hatherton road /Hatherton street, Walsall, WS1 1XS	Caller reporting 2 cars ramming each other. Looks like one chasing the other. White Toyota Previa chasing a black VW Passat. CCTV saw cars driving away (not recorded onto disc so unable to show).
07/02/22	3970	39 Clayhanger Lane, Clayhanger, WS8 7DS	2 cars driving erratically in car park, driving at 50 mph in the car park, pressing their horns and shouting screaming,
08/02/22	4007	Bescot Retail Park, Bescot Crescent, Walsall, WS1 4SB	Vehicles drag racing. Discarded registration plates found.
18/02/22	3096	Fullbrook road, Walsall	2 vehicles made off from officers.
27/02/22	2974	M6 junction 9 to junction 8 on slip road, Walsall	Black Mercedes, big white van and a black golf, vehicles were racing each other, cutting up other vehicles, causing people to swerve, they were nearly colliding with each other.
01/03/22	4511	Queslett Road, Great Barr	Cars racing, has been going on for two hours.
04/03/22	3996	Burslem Close, Bloxwich, Ws3 3tl	Caller reporting that the owner of an orange fiesta ST registration ek63xdd keeps racing up and down the street at all times of the night. This has been going on for months now and even people

			are putting comments on the local Facebook page re the same asking who is this male.
04/03/22	2733	Old Birchills, Walsall, WS2 8QD	Caller reporting 2 off road bikes with no registration plates on racing up and down the street . One is black with a red seat the other is yellow with 300 on and white at the back . One rider is wearing black helmet (black bike) the other is wearing white helmet with red on .
05/03/22	2932	Doe Bank Park, Doe Bank Lane, Great Barr, B43 7In	Street racing in progress. 3 cars - driving over 70 mph - looks like they were racing There were loads of kids around could have hit someone - very dangerous.
08/03/22	4128	Queslett Road, Great Barr	Street racing taking place, happening more and more often.
13/03/22	1096	M6 Junction 9 To Junction 8, Walsall	M6 junction 9 north bound 5-6 vehicles racing on the motorway cutting in and out the traffic, they overtook me on the hard shoulder, they are driving right up behind people.
15/03/22	3054	Dartmouth Avenue, Walsall, WS3 1SP	3 vehicles driving recklessly, caller states one is a car, one is a motorbike and other a quad bike. Caller states she was in her car and they nearly hit into her. Caller states the car was chasing the quad and even hit another vehicle.
19/03/22	4014	Neptune Industrial Estate, Owen Road, Willenhall, WV13 2PZ	30-40 cars arrived. We are the Tesco and 30-40 cars have arrived. They are joy riders and will no doubt cause issues in the store shortly too. This is ASB. They are causing a nuisance on the car park racing

31/03/22	3929	Queslett Road, Great Barr,	Cars racing around Queslett road, regular occurrence.
01/04/22	3379	Lichfield Road, Brownhills	Two vehicles racing each other
17/04/22	3384	Bentley Lane Industrial Park, Bentley Lane, Walsall, WS2 8TL	50+ boy racers /cars gathering on Bentley lane/ heroes centre. Caller reports there are 50+ cars boy racers revving cars. Parked up all over the road and in the middle of the road. Majority are parked on the heroes centre car park. Most of the drivers are Asian. No registrations or colours of vehicles advised. There are still there now, she can hear them revving.
22/04/22	4419	Motorway M6\B\B9/8 J9-J8 Between J9 And J8, M6 Junction 9 From Junction 8 Off Slip, Walsall,	Vehicles racing 115mph. Vehicle stopped by officers and reported.
24/04/22	1009	M6 Junction 9 To Junction 8, Walsall	Two cars racing on motorway
24/04/22	1694	Pinfold, Bloxwich	2 cars chasing each other, unsure of make and model one car was blue the other grey heading towards swimming baths, one male was hanging out the window and male shouted "stop the fucking car".
29/04/22	4386	Redhouse Lane, Aldridge, WS9 0BN	Stolen cars racing around now, 2 young males racing with them.
30/04/22	341	Walsall Housing Group, Beechwood	Cars wheel spinning on car park. Have been doing it for round an

		House, 22 New Road, Willenhall, WV13 2BG	hour, will stop for 5 mins and then start again. First time this has happened can hear it in background of call.
11/05/22	4688	Station Road, Rushall	Off roaders racing around. Complaining about two motorbikes racing up and down, have been at it for last few hours and no sign of stopping. Caller is quite angry says nothing ever gets done and he has got to be up at 0400hrs for work and will not be able to get any sleep. Have tried to advise caller of the health and safety aspect of going after them but caller is not interested.
21/05/22	4234	Car Park, Asda, George Street, Walsall, WS1 1RS	Wheel spinning - racing up and down. Red car and a white one. Callers kids are aged 7 and 9 and caller states the cars have scared his children. They are revving.
25/05/22	2240	Motorway M6\B\B10/9 J10-J9 J10 And J9, M6 Junction 9 From Junction 10 Off Slip, Walsall	Two cars riding through cones.
29/05/22	2646	85 Birchover Road, Walsall, WS2 8TX	ASB - nuisance - cars driving at speed causing nuisance. Caller wanted to also report ASB, next door neighbours' visitors attend a few times a week after 2100 on various days. they drive up and down in their cars at speed.

			its causing a noise nuisance with the engines and exhausts popping and also now that my car has been damaged further risk of damage to cars/property.
30/05/22	2012	288 Stafford Road, Bloxwich, Ws3 3pj	Kids racing in cars- from staffs 999's. Young kids in cars racing around area, nearly knocked someone over. This resulted in a pursuit with one person detained in a stolen car.
01/06/22	3686	91 Broadway West, Walsall, WS1 4DY	Caller concerned for street racing usually starts after 8pm. States he last saw some about 10mins ago and also a couple of days ago. VW Golf R in dark blue , Audi S3 in white, and assortment of other high powered vehicles. Caller concerned for safety others due to the high speed. There's also a Lamborghini that also speeds up there.
01/06/22	4007	106 Wood Lane, Pelsall, WS3 5DZ	Youths have been in the car park for 20 mins are using the football belting the ball towards each other and has bounced off residents' cars, they are racing up and down the road
07/06/22	3209	Land Rear of Stringes Close, Charles Street, Willenhall, WV13 1NS	7 or 8 motorbikes racing. Has been happening for the last 2 hours
07/06/22	2250	Broadway West, Walsall, WS1 3HL	2 cars racing. Part registration given.

16/06/22	4183	97 Reedswood Lane, Walsall, WS2 8QW	<p>Lads causing ASB driving cars up and down. Gang of lads driving cars up and down and drinking.</p> <p>There are 4 cars I can see no details of cars.</p> <p>They have been here for the past 3hrs, this is a daily occurrence.</p> <p>Playing loud music, they are driving at speed up and down the road. This is a 20mph road.</p> <p>Asian males. NHT (neighbourhood team) patrolled area on last late and took details of people parked up in the area looking to issue section 59's (Police reform Act) or cpw's (community protection warnings).</p>
25/06/22	822	31 Chapel Street, Bloxwich, WS3 1LJ	Cars revving, motorbikes speeding up the street. Regular issue.
25/06/22	1567	Ingram Road, Bloxwich	<p>2 range rovers racing. Nearly caused RTC. No registrations, One black, one white range rover.</p> <p>Quite a few passengers in black vehicle.</p>
02/07/22	613	Ida Road, Walsall, WS2 9SR	<p>Loud music coming from cars. States its almost every night. Its the car park opposite his address owned by the shop on the corner.</p>

16/07/22	147	Broadwalk Retail Park, Bescot Crescent, Walsall, WS1 4SB	Caller is reporting that at the back of his house there are numerous cars racing, they are making lots of noise, this happens every night, caller is sick he says he has a disability.
16/07/22	1226	Motorway M6\B\E9 J10-J9 Exit Slip J9, M6 Junction 9 To Junction 10 On Slip, Walsall,	3 cars racing - tailgating - m6 j10. 3 white BMW convertibles Reckless driving. Caller states they were swerving in and out of lanes, speeding and undertaking, slowing down to catch each other, then racing and tailgating
21/07/22	3780	Aldridge Road, Walsall, WS4 2JL	Cars or bikes racing up and down the dual carriageway. Backfiring caller says it's been going on for an hour and is a daily occurrence caller is genuinely concerned that there will be an accident.
28/07/22	845	Stonnall Road, Aldridge, WS9 8JY	Reporting ongoing issues with speeding. The limit is 30 mph, however some people have been seen going 100mph plus. It is always the same 4 vehicles between 17:00 - 18:00.
31/07/22	2472	69 Dale Street, Walsall, WS1 4AN	Causing disruption on the park races the quad bike, group of 20 of them 4 are on quadbikes.
10/08/22	3094	Lucknow Road, Willenhall	Several bikes going up and down the road making a lot of noise - mix of off-road bikes and motorbikes.
13/08/22	173	Wallows Lane, Walsall, WS2 9BZ.	Two evenings running there have been cars being driven round the supermarket car park making the tyres scream. Last night it was 23155, tonight it started at 2205.

18/08/22	283	Walsall Street, Darlaston, WS10 8DU	ASB - males in 5 cars. Caller is reporting again that the Asian males are back there are 5 cars full of Asian males. Caller said they have been there is since 2000hrs. Caller had to ask them to move their car as it was blocking her garage. Further call from another neighbour reporting the same. Offenders are present now. Blasting music. At least 4-5 cars present. Believe this is where they do drug drop offs.
18/08/22	2080	Stafford Street, Walsall, WS2 8DF	White, orange and purple Lamborghinis racing at speed. Gone by green lane college Going up down streets.
18/08/22	2805	Burrowes Street, Walsall, WS2 8HZ	Orange, white and black Lamborghini doing street racing green lane, Stafford Street and hospital street. 2 Asian males driving the white cabriolet Lamborghini. Also, a white Mercedes.
18/08/22	2849	Old Birchills, Walsall	Car cruising - cars racing. Large group gathering in vehicles racing up and down the street. 6-7 vehicles at the moment however there are more turning up.
18/08/22	3672	Junction Birchills Street - Thomas Street, WS2 8NF	Reporting road blocked by supercars. Taken caller 20 mins to get through - lots of supercars blocking the road.
19/08/22	96	Burrowes Street, Walsall, WS2 8HZ	Speeding and revving their engines Multiple Lamborghinis- repeat callers about this issue. Call handler can hear the revving of engines in background
19/08/22	3812	Walsall Street, Darlaston	Roughly 8 vehicles congregating between 19:00 and 07:00hrs. Offenders are all Asian, both males and females.
22/08/22	4289	Walsall Street, Darlaston, WS10 8DU	Vehicles blocking the road. 5-10 vehicles have blocked the roads smoking drugs, daily issue. Yesterday occupants of cars were kicking cats.
03/09/22	3102	Whitton Street, Darlaston, WS10 8AX	Vehicles speeding and drug dealing. Vehicle racing up and down street.

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 04/09/22

Print name in full Philip Upton