

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”

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- 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**

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**WITNESS STATEMENT OF PC SIMON ACKROYD**

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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.

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(4) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

PERSONS UNKNOWN

Defendants

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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**

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**EXISTING SIGNAGE (INSTALLED BETWEEN JANUARY 2015 and JANUARY 2021)**

<b>No</b>	<b>Location of Sign</b>	<b>Material of Sign (Metal or Foamex)</b>
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  
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(8) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

PERSONS UNKNOWN

Respondents

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**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

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KING'S BENCH DIVISION

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Claimants

and

PERSONS UNKNOWN

Defendants

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COMMUNICATIONS PLAN – APPENDIX: “SIGNAGE FIVE”

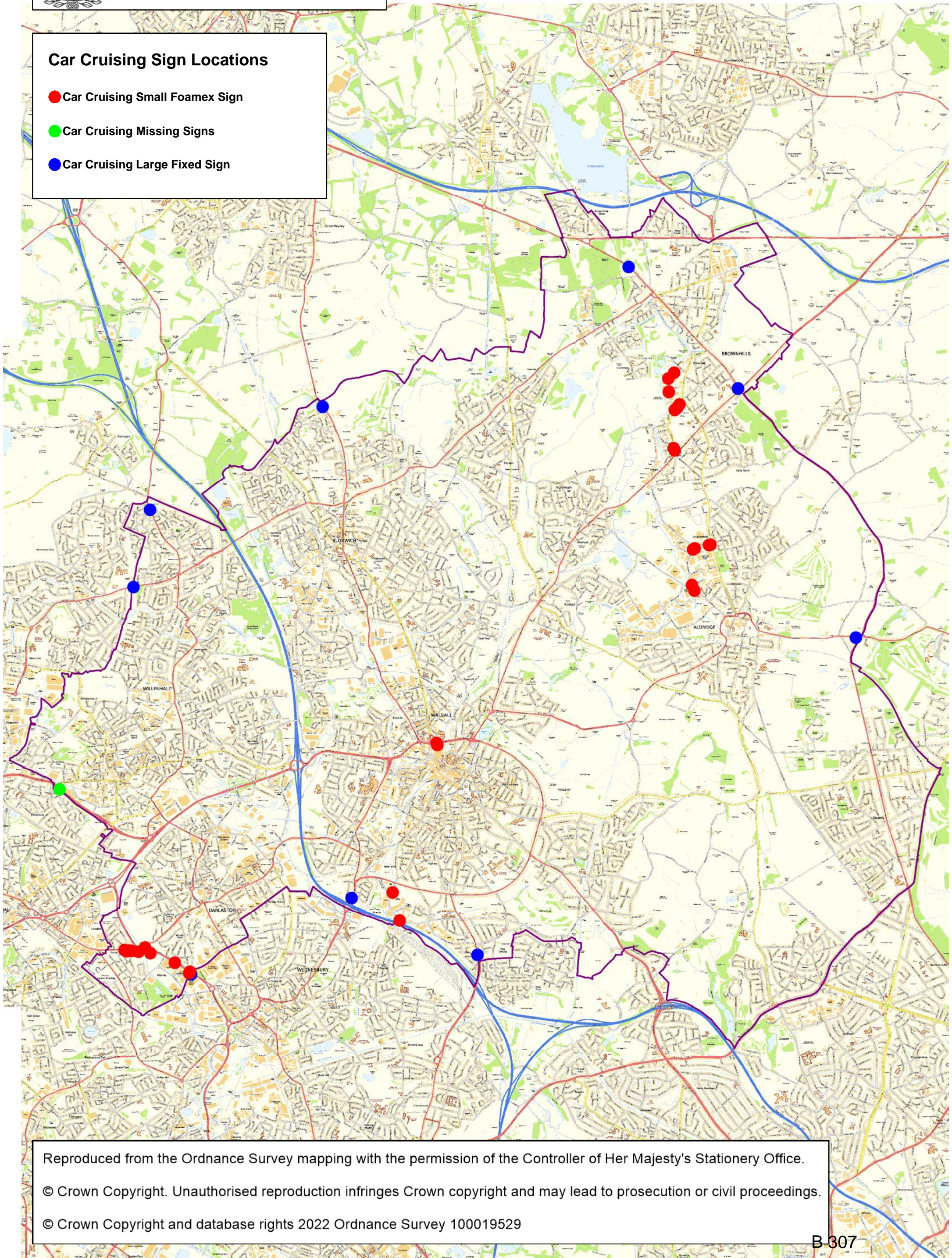
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## Car Cruising Sign Locations

- Car Cruising Small Foamex Sign
- Car Cruising Missing Signs
- Car Cruising Large Fixed Sign





IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

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Claimants

and

PERSONS UNKNOWN

Defendants

---

COMMUNICATIONS PLAN – APPENDIX: “SIGNAGE SIX”

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

**CLAIM NO:**

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**Claimants**

**and**

**PERSONS UNKNOWN**

**Respondents**

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**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**

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**EXISTING SIGNAGE (INSTALLED BETWEEN JANUARY 2015 and JANUARY 2021)**

<b>No</b>	<b>Location of Sign</b>	<b>Material of Sign (Metal or Foamex)</b>
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**

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**Respondents**

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**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**

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**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.**

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Claimants

and

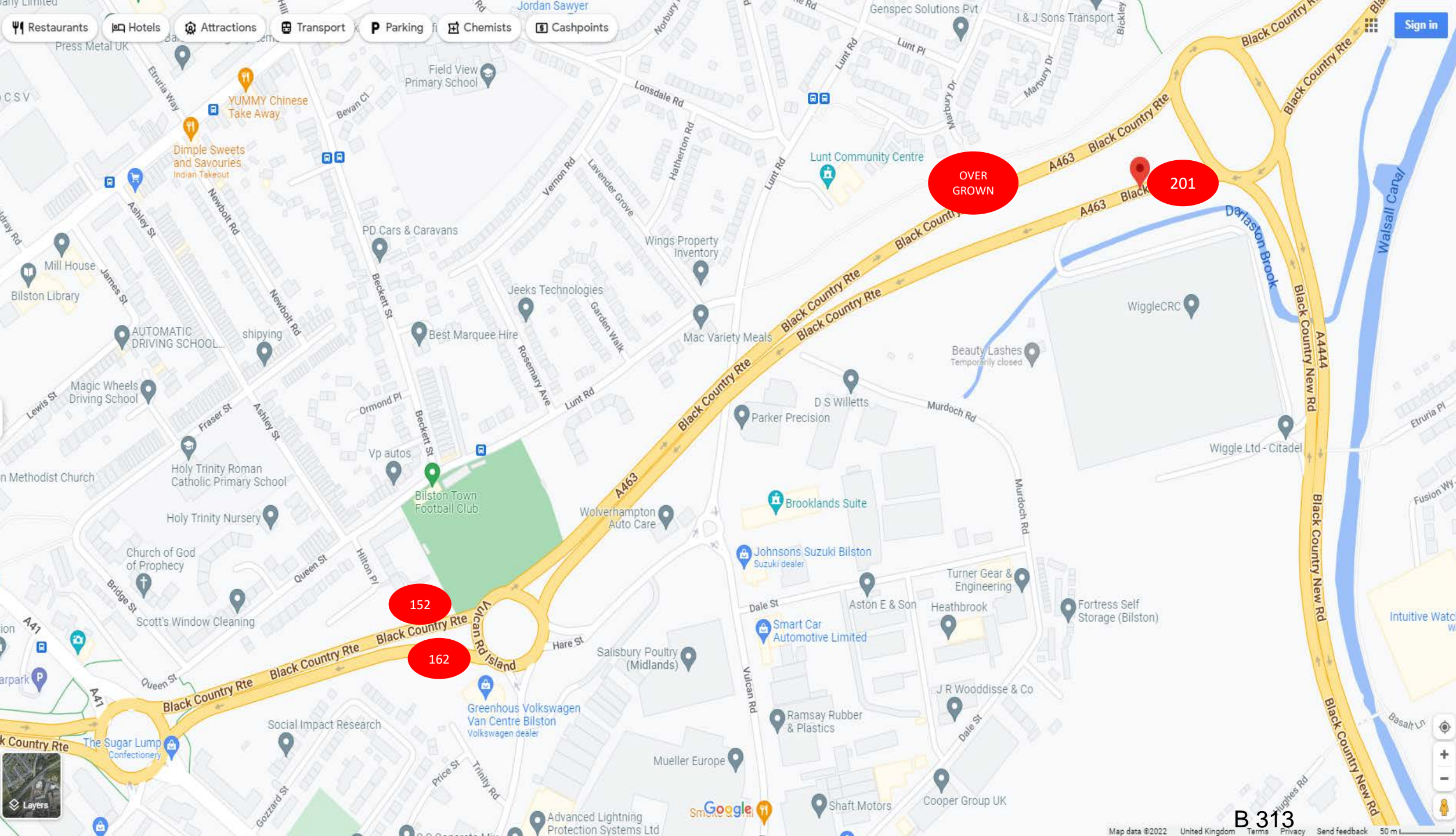
PERSONS UNKNOWN

Defendants

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COMMUNICATIONS PLAN – APPENDIX: “SIGNAGE SEVEN”

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Restaurants Hotels Attractions Transport Parking Chemists Cashpoints

Sign in

OVER GROWN

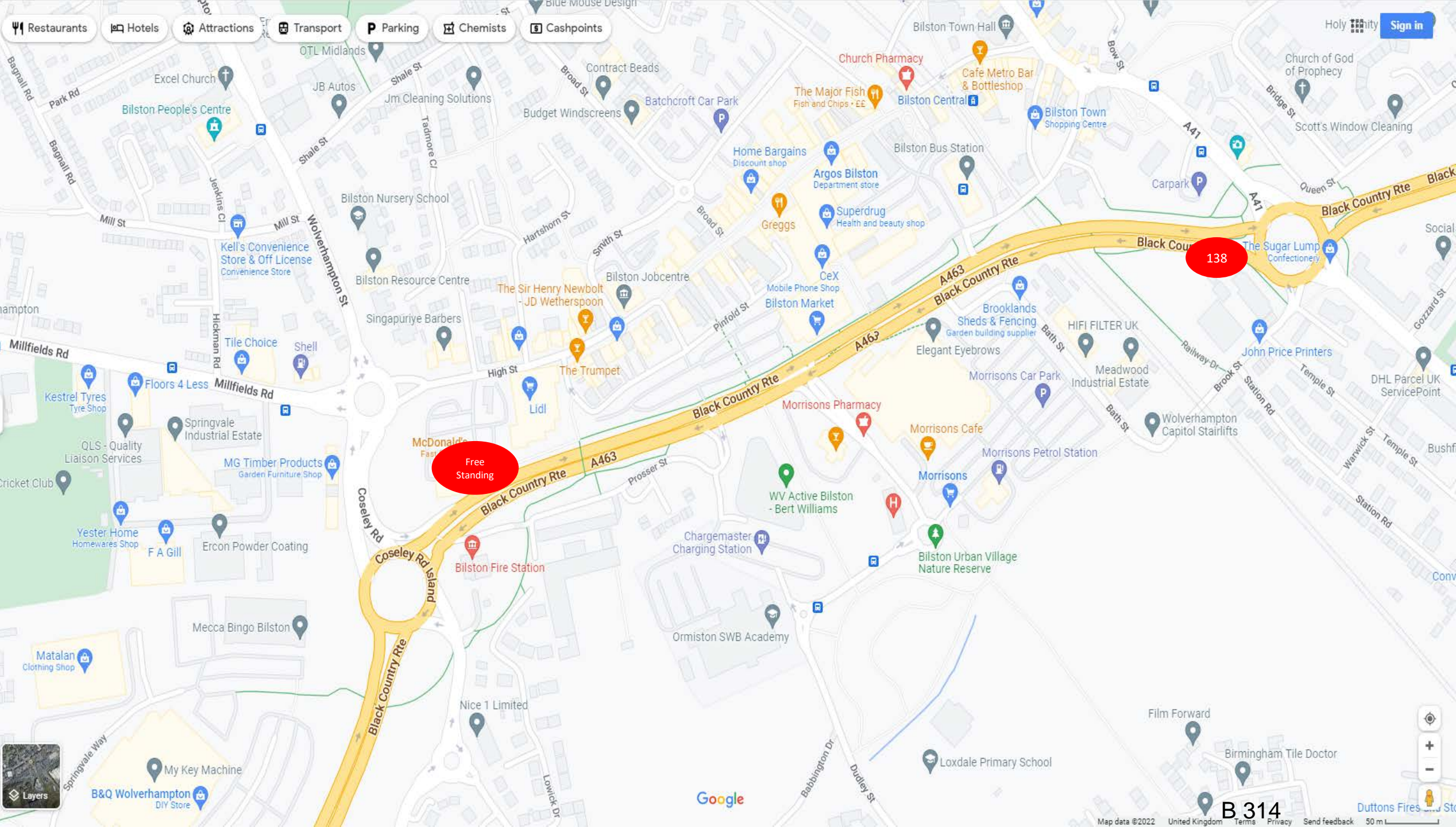
201

152

162

B 313

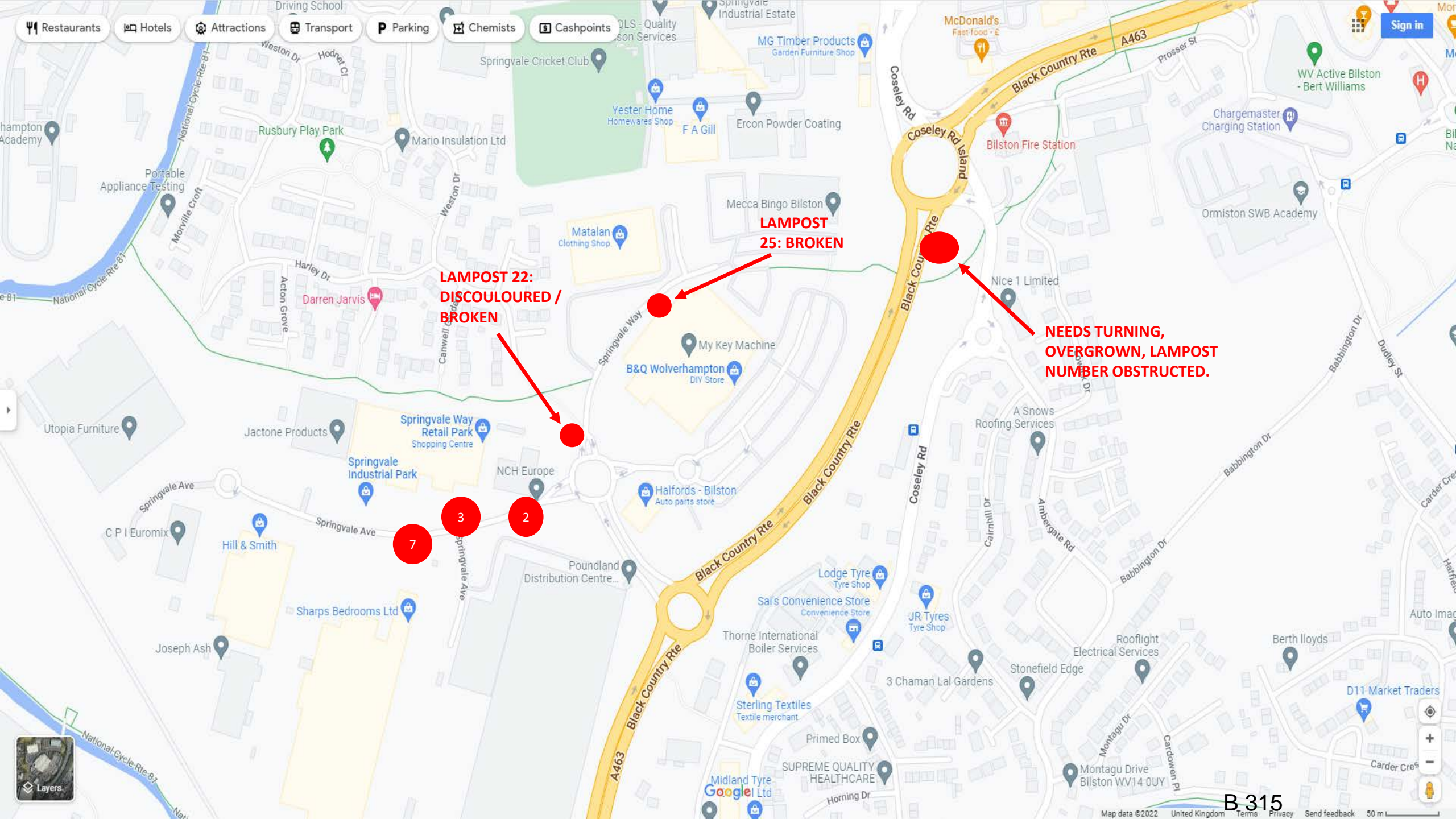




Free Standing

138



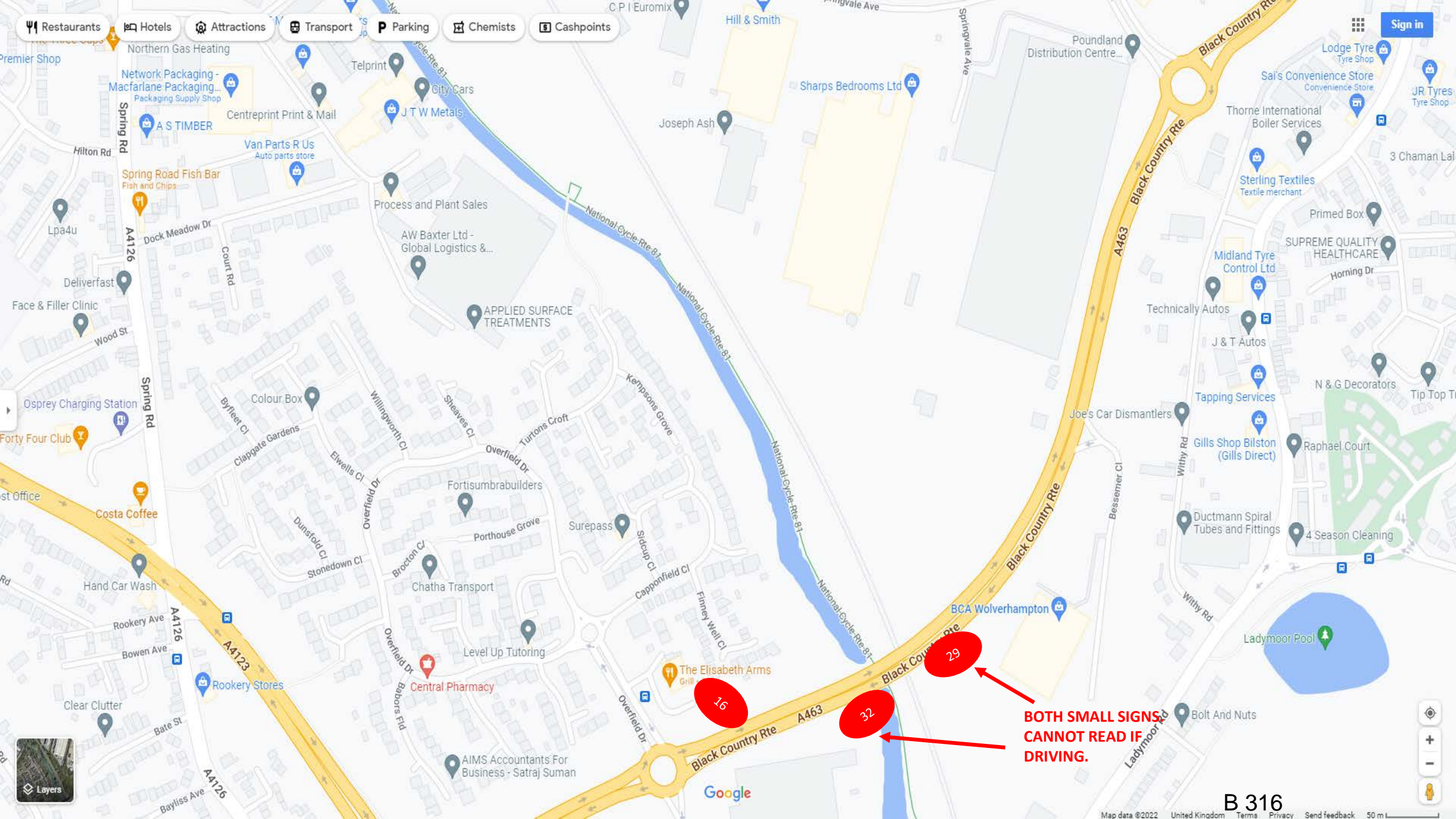


LAMPOST 22:  
DISCOLOURED /  
BROKEN

LAMPOST  
25: BROKEN

NEEDS TURNING,  
OVERGROWN, LAMPOST  
NUMBER OBSTRUCTED.





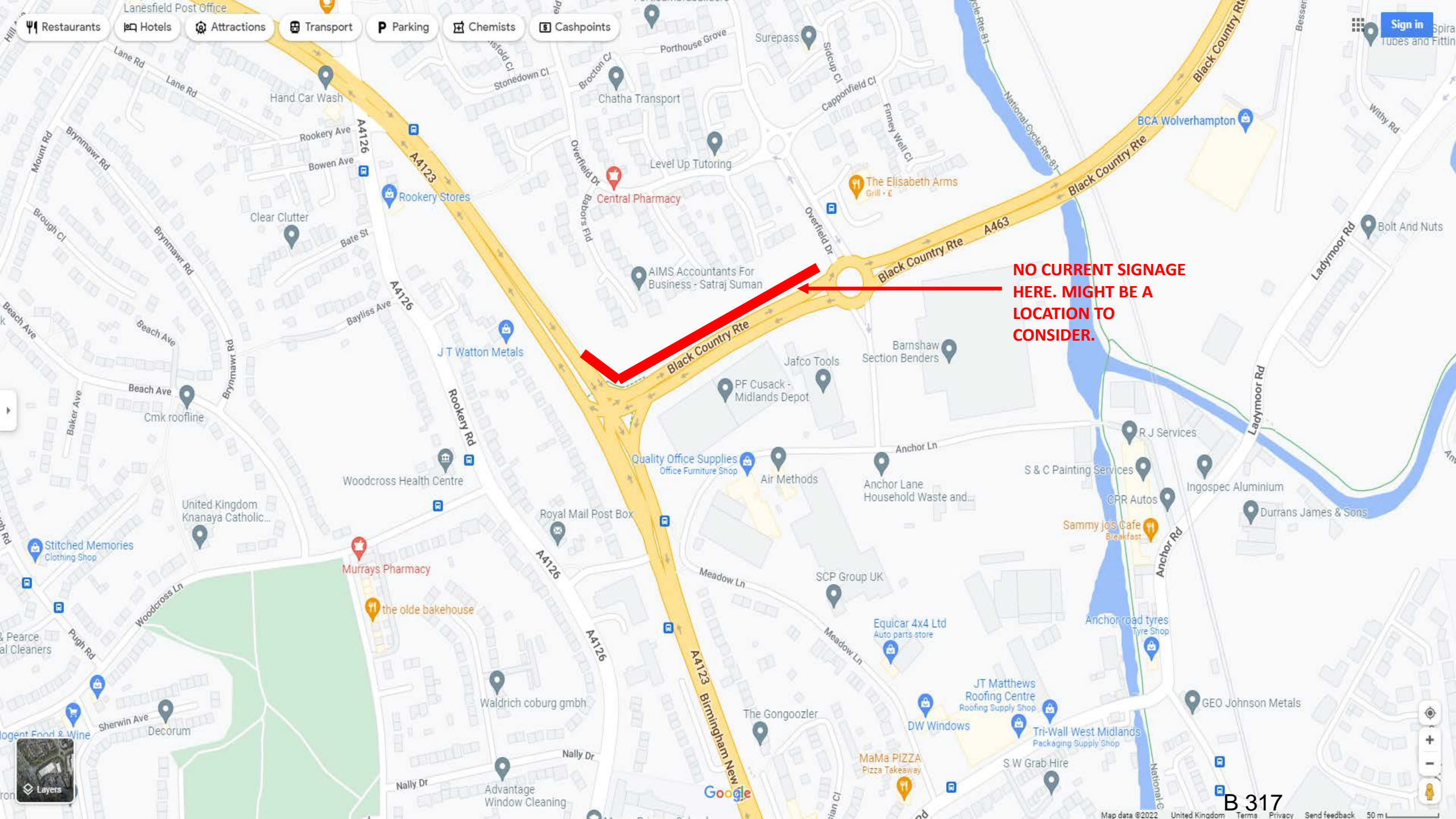
- Restaurants
- Hotels
- Attractions
- Transport
- Parking
- Chemists
- Cashpoints

Sign in

**BOTH SMALL SIGNS  
CANNOT READ IF  
DRIVING.**

B 316





## 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

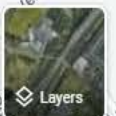
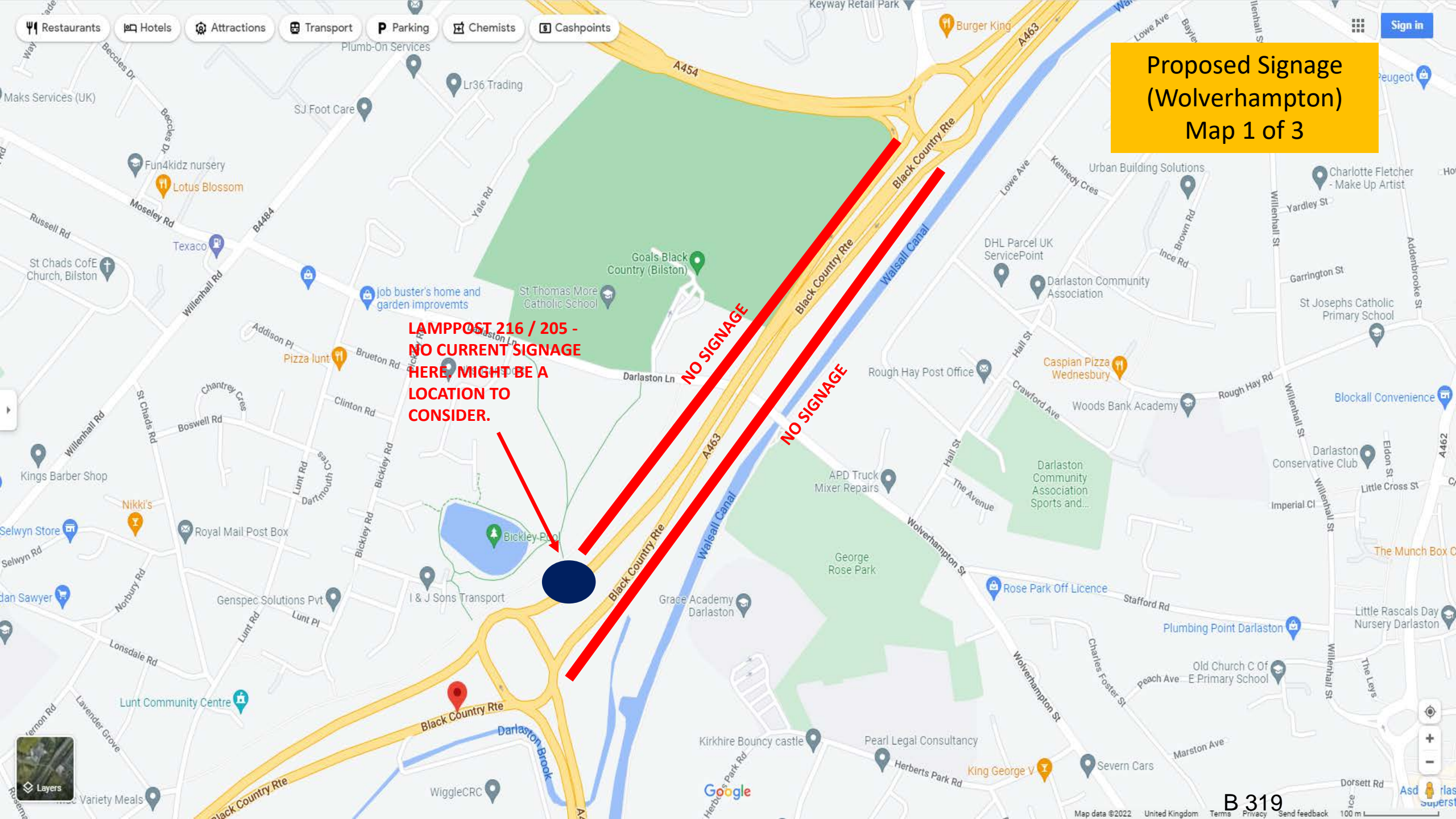


Proposed Signage  
(Wolverhampton)  
Map 1 of 3

LAMPPOST 216 / 205 -  
NO CURRENT SIGNAGE  
HERE, MIGHT BE A  
LOCATION TO  
CONSIDER.

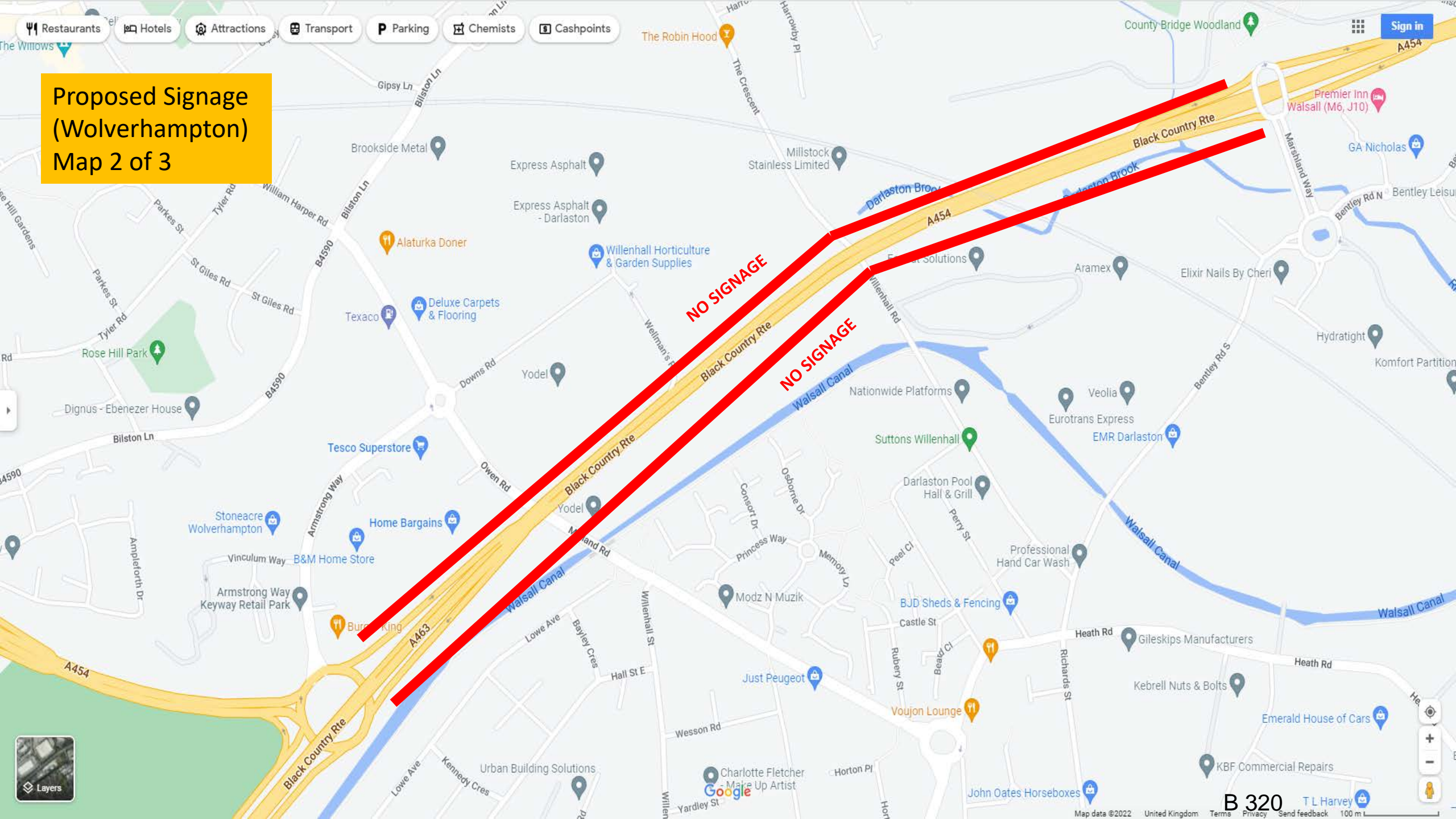
NO SIGNAGE

NO SIGNAGE





Proposed Signage  
(Wolverhampton)  
Map 2 of 3

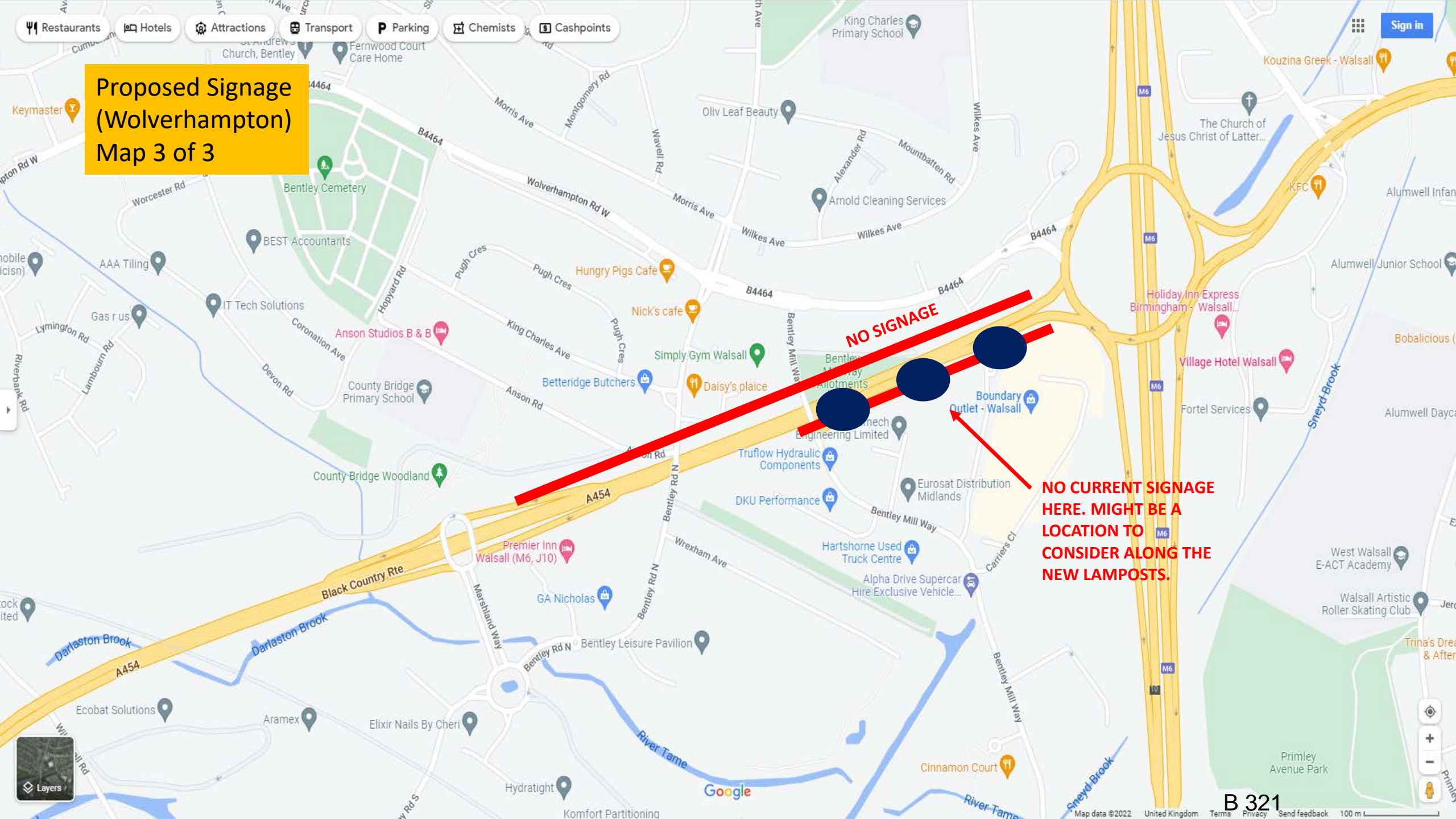


NO SIGNAGE

NO SIGNAGE



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).



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Claimants

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PERSONS UNKNOWN

Defendants

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COMMUNICATIONS PLAN – APPENDIX: “SIGNAGE EIGHT”

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IN THE HIGH COURT OF JUSTICE  
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Claimants

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PERSONS UNKNOWN

Respondents

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**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

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**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**

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**STATEMENT OF  
KATHRYN JONES**

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**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 1<sup>st</sup> December 2014 and came into force on 2<sup>nd</sup> 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) 27<sup>th</sup> 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**

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**WITNESS STATEMENT OF PARDIP SANDHU**

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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 9<sup>th</sup> 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 19<sup>th</sup> 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. 27<sup>th</sup> 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**

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**EXHIBIT "PS1"**

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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"**

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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) 27<sup>th</sup> September  
2022

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

**CLAIM NO:**

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**Claimants**

**and**

**PERSONS UNKNOWN ENGAGING IN DANGEROUS DRIVING AND  
ASSOCIATED ACTIVITIES**

**Defendants**

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**EXHIBIT PS1**

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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 bars 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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<b>Rowley Regis</b>
<b>57320 on 25/3/20</b>
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
<b>58273 on 29/4/20</b>
COVID-19 INCIDENTS:Nuisance motorbiking reported on Warrens Hall Nature Reserve. Reported to be entering from the Vale Entrance.Email and photographs attached.
<b>58416 on 5/5/20</b>
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
<b>60627 on 4/8/20</b>
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
<b>66541 on 20/5/21</b>
Petrol motorbike coming from the nature reserve and through the park by the pond
<b>66581 on 24/5/21</b>
Male on petrol quad bike driving through park, around the pondVery noisy and dangerous for my children and dog
<b>66621 on 25/5/21</b>
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
<b>68374 on 14/8/21</b>
Three motorbikes cruising around Haysech, The Crescent, Haden Close . Constantly repeating this journey throughout the day
<b>69317 on 4/10/21</b>
Reports of off road bikes. Youths believed to reside at 22 Mill Road, Cradley Heath
<b>69642 on 25/10/21</b>
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
<b>69694 on 27/10/21</b>
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
<b>70593 on 28/12/21</b>
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,
<b>70690 on 30/12/21</b>

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.
<b>70887 on 17/1/22</b>
Reports of off road bikes coming from and linked to Mill Road, Cradley Heath
<b>70937 on 20/1/22</b>
Reporting off road bikes/quads linked to this addressIAW
<b>70950 on 20/1/22</b>
Reporting illegal off road bikes coming and going from Congreaves Walk
<b>71033 on 25/1/22</b>
Ongoing reports of vehicle nuisance and loud music from vehicles at the viewing area of View Point

<b>Smethwick</b>
<b>61991 on 9/10/20</b>
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
<b>65421 on 19/3/21</b>
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
<b>67965 on 24/7/21</b>
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.

<b>Tipton</b>
<b>56725 on 19/2/20</b>
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
<b>57288 on 23/3/20</b>
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
<b>57342 on 25/3/20</b>
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
<b>23/3/2057824</b>
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
<b>57916 on 20/4/20</b>
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
<b>59238 on 8/5/20</b>

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
<b>60616 on 1/8/20</b>
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.
<b>61573 on 21/9/20</b>
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
<b>62227 on 19/10/20</b>
**Please note this is the same report already submitted but wrong address was provided - Address is 20 Beech Crescent, Tipton, DY4 0RA**Police have since attended and Bikes haven't been seen for two d
<b>63248 on 5/12/20</b>
Abandoned and Burnt out Motorbike identified on Sheepwash Urban Park by complainant while walking dog.
<b>63961 on 31/12/20</b>
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
<b>64033 on 8/1/21</b>
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
<b>64328 on 3/1/21</b>
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
<b>67562 on 8/7/21</b>
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
<b>67592 on 12/7/21</b>
See attached report - no offenders identified, motorbikes racing around Addison Road, Wednesbury at 15:30 on 9th July 2021
<b>67594 on 9/7/21</b>
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
<b>68122 on 2/8/21</b>



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
<b>58817 on 18/5/20</b>
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
<b>59921 on 2/7/20</b>
Friar Park - Footage saved of an off road motorbike being ridden without a helmet. PASSED FOR INFORMATION. AA.
<b>59924 on 1/7/20</b>
Faiar Park - Car is seen doing donouts on the round about. PASSED FOR ACTION. AA.
<b>60193 on 12/7/20</b>
Wednesbury- noticed tyre marks on car park on playback there was boy racers, footage saved. PASSED FOR INFORMATION. AA.
<b>60431 on 22/7/20</b>
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
<b>60483 on 27/7/20</b>
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
<b>60925 on 14/8/20</b>
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
<b>61467 on 12/9/20</b>
2 to 3 offroad bikes flying up and around dorsett road Enters 123 dorset road address Young males
<b>61666 on 23/9/20</b>
Starting bike outside the property flying up and down dorset road and carisbroke road with 2 more motrbikes riding like idiots
<b>61725 on 26/9/20</b>
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
<b>62895 on 20/11/20</b>
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.
<b>63555 on 12/12/20</b>

Friar Park 2 bike seen ridden on the wrong side of the road. Passed for information NL
<b>65861 on 2/4/21</b>
██████ of █████ Crankhall Lane reporting issues with off road bikes via Cllr Hackett
<b>67236 on 24/6/21</b>
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
<b>67318 on 25/6/21</b>
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
<b>67337 on 26/6/21</b>
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
<b>67338 on 26/6/21</b>
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
<b>67368 on 26/6/21</b>
Friar Park. Footage saved of an IC1 male riding a Red Scooter around outside █████ Addison Road. The police were notified. LJ
<b>67599 on 9/7/21</b>
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
<b>67678 on 12/7/21</b>
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
<b>67727 on 18/7/21</b>
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
<b>67730 on 17/7/21</b>
Members Hotline report: 2 motorbikes seen on Carisbrooke Rd going onto the nearby canal
<b>67731 on 16/7/21</b>
Two motor bikes scramblers ridding around Friar park by Lidl stores basically all around the Friar park.
<b>67736 on 17/7/21</b>
Motor bikes outside pub
<b>67737 on 17/7/21</b>
Gathering of Youths on Motorbikes

<b>67742 on 19/7/21</b>
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
<b>67744 on 19/7/21</b>
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
<b>67745 on 19/7/21</b>
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
<b>67753 on 16/7/21</b>
Friar Park-Footage saved of two motor bikes scramblers ridding around Friar Park for councillor Simon Hackett. EPOs called at the time (Nick) JF
<b>67757 on 17/7/21</b>
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
<b>67766 on 19/7/21</b>
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
<b>67788 on 19/7/21</b>
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
<b>67789 on 19/7/21</b>
From: Simon █ Sent: 19 July 2021 19:38To: Simon █ Subject: Simon we live on remembrance road a bike pulled up which absaltly scare
<b>67790 on 19/7/21</b>
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
<b>67792 on 19/7/21</b>
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
<b>67796 on 20/7/21</b>
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
<b>67797 on 19/7/21</b>

<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>
<b>67800 on 16/7/21</b>
<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>
<b>67802 on 19/7/21</b>
<p>Subject: Community Reporting Online Form - Off Road BikeWHEN? Date and time:&lt;BR&gt;&lt;BR&gt;&lt;BR&gt;WHAT were they doing? HOW were they causing a nuisance?&lt;BR&gt;&lt;BR&gt;&lt;BR&gt;WHERE? Be as specific as possible&lt;BR&gt;&lt;BR&gt;&lt;BR&gt;</p>
<b>67803 on 18/7/21</b>
<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>
<b>67806 on 19/7/21</b>
<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>
<b>67807 16/7/21</b>
<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>
<b>67808 on 19/7/21</b>
<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>
<b>67809 on 19/7/21</b>
<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>
<b>67810 on 19/7/21</b>
<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>
<b>67811 on 19/7/21</b>
<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>
<b>67812 on 19/7/21</b>
<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>
<b>67814 on 19/7/21</b>
<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>



<b>67815 on 19/7/21</b>
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
<b>67816 on 19/7/21</b>
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
<b>67817 on 19/7/21</b>
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
<b>67833 on 20/7/21</b>
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
<b>67834 on 19/7/21</b>
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
<b>67835 on 19/7/21</b>
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
<b>67836 on 19/7/21</b>
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
<b>67837 on 19/7/21</b>
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
<b>67838 on 19/7/21 on 19/7/21</b>
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
<b>67839 on19/7/21</b>
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
<b>67845 on 19/7/21</b>
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

<b>67846 on 19/7/21</b>
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
<b>67847 on 18/7/21</b>
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
<b>67849</b>
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?
<b>67850 on 19/7/21</b>
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
<b>67851 on 19/7/21</b>
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
<b>67852 on 19/7/21</b>
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
<b>67853 on 19/7/21</b>
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
<b>67859 on 19/7/21</b>
Call received via Taskforce. Simon Hackett reporting a nuisance bike at Addison Road. VRM captured on CCTV NV15 NWC
<b>67860 on 20/7/21</b>
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, Wednesbury WHAT DOES THE BIKE LOOK LIKE? Colour
<b>67861 on 20/7/21</b>
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
<b>67862 on 20/7/21</b>
WHAT were they doing? HOW were they causing a nuisance? Speeding up and down Carrington Road WHERE? Be as specific as possible Carrington Road Wednesbury WS10 WHAT DOES THE BIKE LOOK LIKE? Colour markings
<b>67863 on 20/7/21</b>

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
<b>67864 on 20/7/21</b>
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
<b>67865 on 20/7/21</b>
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
<b>67875 on 21/7/21</b>
CCTV Taskforce Report 18: Motorbikes on Addison Road - No EPO Response, camera's checked, Bikes had gone
<b>67909 on 21/7/21</b>
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
<b>67911 on 21/7/21</b>
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
<b>67912 on 21/7/21</b>
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
<b>67914 on 21/7/21</b>
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
<b>67915 on 22/7/21</b>
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
<b>67916 on 22/7/21</b>
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
<b>67968 on 25/7/21</b>
Cllr called to advise of off road bikes around Kilvert Road and Moore Street. Epo's attended and spoke to one rider.
<b>67969 on 25/7/21</b>
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.
<b>68221 on 25/7/21</b>

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
<b>68245 on 6/8/21</b>
Off Road bike form
<b>68371 on 12/8/21</b>
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
<b>68379 on 13/8/21</b>
Motorbikes riding around Remembrance Road
<b>68383 on 15/8/21</b>
Off road motorbikes on the green space. This is an ongoing problem.
<b>68428 on 17/8/21</b>
Joint ASB Team/Police visits due to intelligence of off-road bikes at properties
<b>68429 on 17/8/21</b>
Joint visit completed with the ASB Team due to off road bike intelligence gained by the police
<b>68430 on 17/8/21</b>
Joint Police visit with ASB team due to police intelligence of off road bike at the address
<b>68431 on 17/8/21</b>
Police joint visit with ASB Team following off road bike intelligence
<b>68432 on 17/8/21</b>
Joint visit completed with police and ASB Team due to off road bike intelligence relating to the property.
<b>68446 on 10/8/21</b>
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
<b>68629 on 26/8/21</b>
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
<b>68673 on 29/8/21</b>
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
<b>68758 on 5/9/21</b>
5/09/21 - Call to duty line to report off road bikes round Carisbrooke Road and Manor Junction. No reg on the bikes
<b>68759 on 5/9/21</b>
Call on 5/9/21 at 19.40pm to duty line to report off road bikes around Addison Road
<b>68803 on 5/9/21</b>

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
<b>69430 on 23/9/21</b>
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.
<b>69573 on 24/10/21</b>
Call to Duty Line 24/10/21 at 13.10pm Report of motorbikes on Friar Park Road
<b>69574 on 24/10/21</b>
Call to duty line 24/10/21 at 15.40pm Reports of motorbikes and quad bikes on Friar Park Road
<b>69632 on 24/10/21</b>
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
<b>69715 on 31/10/21</b>
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
<b>69743 on 31/10/21</b>
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
<b>69745 on 31/10/21</b>
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
<b>69761 on 31/10/21</b>
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
<b>69880 on 3/11/21</b>
Councillor Enquiry FS-Case-375938509: Anonymus 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
<b>69989 on 17/11/21</b>
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
<b>70022 on 17/11/21</b>
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
<b>70222 on 17/11/21</b>



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
<b>70223</b>
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
<b>70298 on 5/12/21</b>
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
<b>70404 on 12/12/21</b>
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
<b>70405 on 15/12/21</b>
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
<b>70602 on 27/12/21</b>
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
<b>70603 on 27/12/21</b>
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
<b>71252 on 2/2/22</b>
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
<b>71253 on 2/2/22</b>
Friarpark (Cam 285) - Male captured rallying down residential street on a dirt bike with no registration. AA
<b>71276 on 5/2/22</b>
Report of off road bikes on Bassett Road
<b>71279 on 4/1/22</b>
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
<b>71280 on 7/2/22</b>
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
<b>71281 on 19/1/22</b>
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

<b>71282 on 20/1/22</b>
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
<b>71283 on 23/1/22</b>
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
<b>71284 on 1/2/22</b>
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
<b>71285 on 3/2/22</b>
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
<b>71286 on 3/2/22</b>
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.
<b>71314 on 7/2/22</b>
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
<b>71343 on 9/2/22</b>
Reports of off road bike on Crankhall Lane, doing a wheelie in the middle of the road
<b>71347 on 10/2/22</b>
Nuisance Motorbike Report, recieved via Ckllr Hackett FS-Case-400015573
<b>71348 on 9/2/22</b>
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
<b>71359 on 9/2/22</b>
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
<b>71360 on 10/2/22</b>
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 !!!
<b>71417 on 11/2/22</b>
Crankhall lane - motor bike seen being driven dangerously EPOs did not attend

<b>72214 on 21/3/22</b>
Report of off road bikes on Hydes Road
<b>72234 on 22/3/22</b>
Motorbikes being driven eratically and dangerously in Crankhall Lane, Wednesbury

<b>West Bromwich</b>
<b>59636 on 23/6/20</b>
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
<b>59702 on 26/6/20</b>
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
<b>60153 on 16/7/20</b>
Boy racers turned up to try out the new road surface the council have just laid !!
<b>60253 on 18/7/20</b>
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
<b>60254 on 18/7/20</b>
WE had boy racers YET AGAIN !! They are now bringing FIREWORKS !!
<b>60277 on 20/7/20</b>
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
<b>60476 on 28/7/20</b>
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
<b>60684 on 1/8/20</b>
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
<b>60694 on 2/8/20</b>

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.
<b>60811 on 7/8/20</b>
Kenrick House- Tenant at flat 80 reported several cars parked on the car park outside the block and drivers racing along Kenrick Way. Dialed 101 and tried to report the matter to the Police for long
<b>60828 on 8/8/20</b>
Kenrick way. People congregating watching vehicles racing and speeding. Registrations captured. PASSED FOR ACTION JF
<b>60991 on 14/8/20</b>
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
<b>61146 on 23/8/20</b>
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
<b>61221 on 28/8/20</b>
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.
<b>61231 on 30/8/21</b>
Kenrick House - tenant from flat 80 call to report boy racers are back. RESOLVED. AA.
<b>61255 on 1/9/201</b>
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
<b>61932 on 7/10/20</b>
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
<b>62734 on 12/11/20</b>
Report of nuisance motorbikes on Greets Green Plating Fields. See emails attached to notes.
<b>63599 on 14/12/20</b>
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.
<b>63834 on 25/12/20</b>
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
<b>63835 on 26/12/20</b>

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
<b>63836 on 27/12/2-</b>
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
<b>64218 on 17/1/21</b>
Regular incident of scrambler bikes racing in streets, along fields side of estate, on pavements and down gullies. No number plates on bikes.
<b>64238 on 17/1/21</b>
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
<b>64502 on 31/1/21</b>
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.
<b>65386 on 17/3/21</b>
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
<b>65975 on 13/4/21</b>
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
<b>66449 on 16/5/21</b>
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.
<b>66883 on 8/6/21</b>
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
<b>66935 on 12/6/21</b>
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
<b>67138 on 8/6/21</b>
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
<b>67666 on 14/7/21</b>
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
<b>67829 on 28/6/21</b>



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
<b>68961 on 13/9/21</b>
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
<b>69936 on 14/11/21</b>
6 motorbikes riding along the footpath along side Q3 school heading towards the canal and Yew Tree Estate.The restricter on the path has been removed again,having been replaced about 6 weeks ago.A mor
<b>70162</b>
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
<b>71004 on 24/1/22</b>
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
<b>71006 on 24/1/22</b>
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
<b>71175 on 1/2/22</b>
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
<b>71237 on 4/2/22</b>
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
<b>71914 on 7/3/22</b>
cars speeding up and down walsall road
<b>71891 on 7/3/22</b>
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.
<b>72090 on 17/3/22</b>
motorbike issues in and around Ray Hall Lane and the water treatment works managed by Severn Trent.
<b>72230 on 23/3/22</b>
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) 27<sup>th</sup> 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

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## EXHIBIT PS2

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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**

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**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**

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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**

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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](mailto:Steve.Gittins@walsall.gov.uk)>  
**Sent:** Wednesday, April 7, 2021 5:40:17 PM  
**To:** Councillor Bott P <[Cllr.Paul.Bott@walsall.gov.uk](mailto: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 14<sup>th</sup> 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

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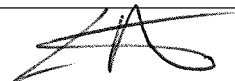
I, LEE PLANT, Sergeant 2882 of West Midlands Police, currently stationed at Bilston Police Station, Wolverhampton, WILL SAY AS FOLLOWS:

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  
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(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 15<sup>th</sup> 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 -

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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

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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

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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

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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

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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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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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Crime No. URN 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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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

Signature .....

Signature witnessed by .....

Crime No.

URN

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 ROUTE 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

Signature .....

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03/2016

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Crime No.

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Statement of **Lee Plant**

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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Crime No. URN Statement of **Lee Plant**

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,

Signature .....

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Crime No.

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Statement of **Lee Plant**

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 TODAY'S 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.

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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 <b>with the crime number on.</b>  | 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) <b>Child witness cases only.</b> 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**

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**WITNESS STATEMENT OF**  
**PC 0544 JONATHAN EDWARDS**

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**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 23<sup>rd</sup> October 2021 and 10<sup>th</sup> 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 23<sup>rd</sup> October 2021 to 10<sup>th</sup> April 2022 below : -

Date	Log No.	Location	Details
21-10-21 17.30	3172 & 3192	<b>Bromsgrove Rd, Halesowen</b>	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	<b>Showcase Cinema, Dudley</b>	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	<b>Waterfront Way car park, Brierley Hill</b>	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	<b>Shell Filling Station, Manor Way, Halesowen</b>	Cars gathering for racing – Op Hercules – Can see 25 cars. Looks like they are getting ready to race.
20-11-21 19.21	3492	<b>Copthorn Hotel Car Park, Brierley Hill</b>	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	<b>Showcase Cinema, Dudley</b>	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	<b>Manor Way, Halesowen</b>	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	<b>Stourbridge Ring Road</b>	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	<b>Tesco Extra, Castle Gate, Dudley</b>	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	<b>Manor Way, Halesowen</b>	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	<b>Manor Lane (Way) Halesowen</b>	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	<b>M5, Junction 3 to Junction 4, Dudley</b>	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	<b>Multistorey Car Park, Pool Road, Halesowen</b>	Boy racers in the car park.
29-01-22 00.39	134	<b>Grazebrook Road, Dudley</b>	Boy racers. Vehicles involved are a white vehicle with a black roof, silver 1 series BMW BOYRACERS -
31-01-22 22.54	4524	<b>Pedmore Road, Dudley</b>	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	<b>Car Park, Waterfront West, Brierley Hill</b>	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	<b>Car Park, Waterfront West, Brierley Hill</b>	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	<b>Showcase Cinema, Dudley</b>	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	<b>Tesco Extra, Castle Gate, Dudley</b>	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	<b>Waterfront Way, Brierley Hill</b>	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	<b>Waterfront Way, Brierley Hill</b>	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	<b>Tesco Express Castle Gate Dudley</b>	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	<b>Tesco Express Castle Gate Dudley</b>	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	<b>Wallows Road, Brockmoor</b>	- 2 Motorcycles racing around using the street as a race track, trying to goad officers into chasing them.
09-03-22 22.01	4345	<b>Tesco Extra Castle Gate Dudley</b>	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	<b>Milton Street, Pensnett</b>	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	<b>Manor Way, Halesowen</b>	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	<b>Mill Race Lane, Stourbridge</b>	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	<b>Westland Gardens, Amblecote</b>	Ongoing ASB with boy racers over weekends. Large amount of noisy vehicles driving erratically. Ongoing issues
01-04-22 22.38	4320	<b>Andrew Road, Halesowen</b>	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	<b>Tesco Extra The Crown Centre Stourbridge</b>	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	<b>Manor Way, Halesowen</b>	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	<b>Oak Green, Dudley</b>	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	<b>Flood Street Island, Dudley</b>	Boy racers, about 50 vehicles, unknown how long, going about 70/80 mph
10-04-22 22.32  22.34	3866  3875	<b>Manor Way Halesowen</b>	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**

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**WITNESS STATEMENT OF SERGEANT RICHARD PHILLIPS**

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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**

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**WITNESS STATEMENT OF Temporary Inspector 29944 Philip Upton**

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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**

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**WITNESS STATEMENT OF Temporary Inspector 29944 Philip Upton**

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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

## D. SECTION D - Statements of Councillors, MPs, Residents and Business for Wolverhampton

**WITNESS STATEMENT****Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B****Investigation No.****Case Number**

Statement of: Mr Dharminder Dhaliwal

Age if under 18: over 18 (if over 18 insert "over 18")

Occupation: Accountant

This statement (consisting of 2 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.

**Date:** Friday, 10 June 2022**Signature:**Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am the person name above and live at the address overleaf.

I have lived close to the Black Country Route for 16 years. It has generally been a nice place to live however a few years ago boy races began racing up and down and the noise from this has began to effect my quality of life. The problems stopped when there was an injunction in place however since the injunction ended the problems have got worse.

The issues surrounding the racers generally happens on an evening between 2200 hrs and 0200 hrs when the weather is nice and especially on bank holidays. I often hear the noise from the car engines when the cars race from the Birmingham New Road up the Black Country Route towards Bilston. I have double glazing in my house however this does not stop the noise from the cars and makes me struggle to be able to sleep. The lack of sleep is really effecting my quality of life as I am waking up in the morning feeling tired and struggling to concentrate throughout the day. Due to COVID 19 I now work from home and due to the flexibility of this I can work all hours of the day so I sometimes decide to work during the night. The noise from the racers means I cannot concentrate on my work which is severely effecting my productivity and making me worse at my job through no fault of my own.

My wife and teenage son have also said to me that they struggle to sleep or do simple tasks like read whilst the racing is going on. As a family we have all said that the noise whilst the racing is happening is unbearable. If another injunction was put in place I would be a lot happier as I believe the noise levels would go down and I could relax more in my own home.

This statement has been completed over the telephone with PC 23797 Kendrick. He has read it back to me and I can confirm everything in this statement is true. I am happy to sign this statement at a later date if needed.

*I believe the facts stated in this witness statement and as amended in any tracked changes [and initialled] are true.*

**Signature:**

Signature witnessed by: Brandon Kendrick 23797

Signature:

Signature witnessed by: Brandon Kendrick 23797

Signature:

Signature witnessed by: Brandon Kendrick 23797



**WITNESS STATEMENT****Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B****Investigation No.****Case Number**

Statement of: Mrs Margaret Clemson

Age if under 18: over 18 (if over 18 insert "over 18")

Occupation: Estate Agent

This statement (consisting of 2 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:****Date:** Saturday, 11 June 2022Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am the person named above and live at the address overleaf.

I have been playing Bingo at Mecca just off the Black Country Route now for about 16 years. I have never had a problems there and I really enjoy playing however the past 12 months have been hell due to the boy racers on the Black Country Route.

My bingo usually finishes between 2130 hours and 2200 hours which is when I would go home. The first encounter I had with the boy racers was about 12 months ago on a Saturday night as I was leaving Bingo. I came out of the car park of Mecca and headed to the island by the Black Country Route. As I was approaching the Black Country Route I could see a line of cars parked blocking the road. I could hear the noise of cars racing so I wasn't sure what was happening. I put my window down and asked one of the males if there had been a crash and he just laughed at me. I could see 100's of cars racing up and down so I called the police. One of the males blocking the road must have heard me on the phone so a group of them surrounded my car and said "You're not calling the police are you?". Due to the amount of people I immediately felt threatened and frightened and I thought they were going to hurt me so I hung the phone up. I was stuck there for an hour until the boy races left and I did not get home until about 2300 hours which is really late for me. Taxis couldn't get in or out to pick people up which meant some of my friends from bingo couldn't get home for their medication.

On another occasion I have left Mecca and got onto the Black Country Route and all of the racers have driven past me at ridiculously high speeds. I was scared for my life and I believe someone will die soon if the boy racers aren't stopped.

This behaviour from the racers happens every Saturday at about 2200 hours and I haven't gone near the racers again due to fear for my safety. On Saturdays now, I will walk towards B&Q and if I hear the racers I will go back inside Mecca and accept that I will be late home as I am not putting myself through that again. The amount of people playing bingo at Mecca on a Saturday night now has gone down drastically due to people being scared of the boy racers and I am scared that I will no longer be able to play bingo. Bingo helps me socialise with people of a similar age to myself and if I no longer play I don't know what I will be able to do with my time.

I think that speed cameras would help stop the problems as this would act as deterrent for the boy racers when driving fast down the Black Country Route which I think could save someone's life.

This statement has been completed over the telephone with PC 23797 Kendrick. He has read it back to me and I can confirm everything on this statement is true. I am happy to sign this statement at a later date if needed.

Signature:

Signature witnessed by: Brandon Kendrick 23797

Investigation No.

Case Number

Statement of: Mrs Margaret Clemson

*I believe the facts stated in this witness statement and as amended in any tracked changes [and initialled] are true.*

Signature:

Signature witnessed by: Brandon Kendrick 23797

Signature:

Signature witnessed by: Brandon Kendrick 23797

**WITNESS STATEMENT****Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B****Investigation No.****Case Number**

Statement of: Mrs Nicki Wellings

Age if under 18: over 18 (if over 18 insert "over 18")

Occupation: Store manager

This statement (consisting of 1 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.

**Date:** Saturday, 11 June 2022**Signature:**Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am the above named person. I am making this statement in relation to the car cruising along the Black country route in Bilston. The racing has been going on for 5 or 6 years, this happens every weekend on a Saturday and Sunday night between 22:00 and 00:15 with cars racing up and down the road and drifting around the island opposite our house. It is mainly the noise which affects us, we are not able to sleep until the racers leave and don't go to bed until it finishes, sometimes very late. We know when the racing is about to start as we see them all park in Withy Road and cut through the gully which goes to the Black country route to spectate. This affects us in our home as the racing dictates what time we are able to go to bed, this is happening every weekend and affects mine and my family's sleep. My daughter is currently doing her GCSEs and my husband has to get up at 04:00 in the morning to go to work, this can really affect them as my husband can sometimes only have a couple of hours sleep a night due to the noise and if my daughter has an exam she needs the rest prior to this.

*I believe the facts stated in this witness statement and as amended in any tracked changes [and initialled] are true.*

Signature:

Signature witnessed by: Matthew Denny 24077

Signature:

Signature witnessed by: Matthew Denny 24077

**WITNESS STATEMENT****Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B****Investigation No.****Case Number**

Statement of: Mr Taylor Harvey - Beardsmore

Age if under 18: 16 (if over 18 insert "over 18")

Occupation: Barista

This statement (consisting of 1 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.

**Date:** Saturday, 11 June 2022**Signature:**Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am the person named above and live at the address overleaf.

I live close to the Black Country Route and for the past 3 to 4 months I have been having issues with boy racers driving up and down the road driving extremely dangerously. On weekends between 2200 hours and 0000 hours I am often driving with my family down the Black Country Route. On numerous occasions I have been either overtaken or undertaken by cars racing and I have been scared that there will be a collision. There is often 3 or 4 cars drifting around the islands making them impossible to drive through. I have 4 younger brothers and sisters who are often in the car and I am scared for their safety when driving on the Black Country Route. This has also happened in the daytime and I think something needs to be done to stop the racers or somebody will get seriously hurt.

This statement was completed over the telephone with PC 23797 Kendrick. He has read it back to me and I can confirm everything in this statement is true. I am happy to sign this statement at a later date if needed.

*I believe the facts stated in this witness statement and as amended in any tracked changes [and initialled] are true.*

Signature:

Parent/guardian signature:

Signature witnessed by: Brandon Kendrick 23797

Signature:

Signature witnessed by: Brandon Kendrick 23797

Parent/guardian signature:

**WITNESS STATEMENT****Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B****Investigation No.****Case Number**

Statement of: Mr Teja Sidhu

Age if under 18: over 18 (if over 18 insert "over 18")

Occupation: Retired

This statement (consisting of 1 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.

**Date:** Saturday, 11 June 2022**Signature:**Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am the person named above and live at the address overleaf.

I am making this statement about issues I have been having with boy racers on the Black Country Route near to my house. For the past 3 years on a Friday or Saturday night the boy racers have gathered on the Black Country Route. It usually starts at about 2230 hours and can go on for over an hour. The noise which the racing generates is ridiculously loud. From my house I can hear tyres screeching and the exhausts revving. I also hear the loud bangs from the modified exhausts on the cars. This noise is piercing and I cannot sleep whilst the racing is happening which makes me feel extremely tired the following day. Sometimes if I cannot sleep I will go out to look what is happening. There are usually between 20 to 30 cars getting ready to race on the island by B&Q and about 10 cars racing up and down the roads. The speeds the drivers go at is extremely dangerous and I am sure they go over 100 miles per hour.

This statement has been completed over the telephone with PC 23797 Kendrick. He has read it back to me and I can confirm everything that is said in the statement is true. I am happy to sign this statement at a later date if needed.

*I believe the facts stated in this witness statement and as amended in any tracked changes [and initialled] are true.*

Signature:

Signature witnessed by: Brandon Kendrick 23797

Signature:

Signature witnessed by: Brandon Kendrick 23797

**WITNESS STATEMENT****Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B****Investigation No.****Case Number**

Statement of: Miss Teresa Welburn

Age if under 18: over 18 (if over 18 insert "over 18")

Occupation: tesco

This statement (consisting of 1 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.

**Date:** Saturday, 11 June 2022**Signature:**Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am the person named above and live at the address overleaf.

I have lived near the Black Country Route for approximately two years and for the whole time I have had issues with boy racers racing up and down the road. The problems usually start at 2200 hours and it generally happens on a bank holiday or a Sunday. From my house I can hear the racers driving up and down the road at a ridiculously high speed. I can hear the exhausts as they have been modified and there is often a loud bang whenever they are accelerating. The racing usually goes on for between 60 and 90 minutes. I struggle to sleep due to the loud bangs which effects my performance at work the next day as I am always exhausted due to lack of sleep. My sister usually comes over to mine on a weekend however on a bank holiday she refuses to come as she is petrified as being in a traffic collision.

On one occasion I have been driving whilst the racing was going on and it was terrifying. I was on the island by McDoanlds in Bilston and the boy racers were driving at high speed round the island and some were even going the wrong way around the island. I am surprised nobody has been killed. The boy racers show absolutely no consideration for other road users due to the dangerous driving and no consideration for local residents due to the noise pollution.

This statement has been completed over the telephone with PC 23797 Kendrick. He has read it back to me and I can confirm everything said on this statement is true. I am happy to sign at a later date if needed.

*I believe the facts stated in this witness statement and as amended in any tracked changes [and initialled] are true.*

Signature:

Signature witnessed by: Brandon Kendrick 23797

Signature:

Signature witnessed by: Brandon Kendrick 23797

i) Statement of: J Bateman  
ii) Statement No: 1  
iii) For: Claimants  
iv) Dated: 26.05.2022  
v) Exhibits: 0

**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 JENNIFER BATEMAN**

---

I, Jennifer Bateman of [REDACTED] Capponfield Close, Sedgemoor Park, Wolverhampton, WV14 9XL, WILL SAY AS FOLLOWS:

1. I am Jennifer Bateman of the address stated above.
2. This statement is in relation to the application by the four Black Country Councils to re-apply for an injunction against persons unknown in relation to car cruising.
3. I am aware of the original injunction, which was granted some years ago now and was in response to ongoing noise, danger and threatening behaviour we experienced due to car cruising in our area. Regularly, our peace and sleep would be disturbed by the sounds of high- performance engines, noisy exhausts and backfiring and the noise from large crowds of spectators who gathered to watch these events. The noise was so bad at times that it could be heard above the television.

4. Dozens of spectators' cars would be parked on side roads, grass verges and even pavements whilst their owners lined the roads and road traffic islands in order to watch the cars racing against each other.
5. We frequently feared for our safety when trying to drive through these events and we felt unable to walk our streets in safety. There were instances when members of the public have almost been driven off the road by the participants. We feared that there would be loss of life.
6. This problem was particular to the Black Country Route in Bilston. When the injunction came into force, there was an enormous improvement and, despite the occasional breach, we feel that the injunction and the response from the police significantly helped to reduce this problem.
7. I understand that in January 2021 the authorities applied to the High Court for the most recent injunction to be renewed. However, I further understand that this matter was adjourned, which means that there is currently no injunction in place to stop or prevent this anti-social behaviour from taking place.
8. I would like to inform the court that as soon as the injunction ended on 1 February 2021, we have started to experience anti-social behaviour from car cruising. As anticipated, car cruising has become a regular weekend event again now that there is no injunction in place.
9. The drivers appear to be playing a game of 'cat and mouse' with the police as they complete several laps and then disappear to another area; I can only assume that this is to 'out-fox' the police. I am unable to say how many vehicles are involved at any one time, but I can most certainly hear them with their noisy racing engines and constant backfiring.



10. Since the injunction ended, I have heard numerous short sharp bursts of activity, but notably there are three dates when I have heard significant noise from cars racing along the A463 Black Country Route between the traffic island at Overfield Drive and the Springvale island in Bilston. These incidents are as follows:

- the evening of 6 February 2021 when we experienced our first car cruising/boy racer event since the injunction lapsed;
- Friday 26 February 2021 when I noted the activity started at 9.24 pm; and
- Friday 5 March 2021 which started at 8.50 pm.

These events followed the same strategy as described in paragraph 9 above. As I have said above, I must stress that I cannot see what is happening, but I can certainly hear the noise.

11. These events can happen from early evening throughout the night. Due to the way in which the drivers are behaving, by the time we are ready to report it to the police, they have moved elsewhere, only to return again later. Therefore, my husband and I have not been able to report these incidents to the police. I do hope that no one is injured or killed.

12. We haven't noted any further dates or times since the above, due to being aware that the previous injunction was not being renewed. It's not something that is easy to capture by way of keeping a record or calling the police as and when it happens. We have started to feel a bit despondent, as we understand the police may have more important things to deal with. We've tended to think "what's the point in reporting", but it's definitely still happening, with it mainly occurring from 9.30 and 10pm on a weekend.

13. We often hear several vehicles roaring along the A463 Black Country Route between its junction with the A4123 Birmingham New Road, past the Overfield Drive island and the island at Springvale Way heading towards Bilston and back again with loud, racing sounds and backfiring/crackling exhaust noises. We eventually hear them going off into the distance and hope that no accidents have occurred. This seems to be a prime route for these drivers.

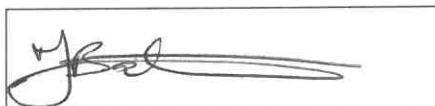
14. Our lives will become unbearable if the injunction is not granted. I strongly and urgently request that the court not only grants the injunction against car cruising, organisers and participants but also extends it to cover spectators. It would give us total peace of mind if the injunction could become permanent.

**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**

**Signed**



**Date**

26.5.2022

**Print name in full** JENNIFER BATEMAN

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

Statement filed on behalf of: Dudley MBC  
Statement of: James Morris (MP)  
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**

---

**WITNESS STATEMENT OF  
JAMES MORRIS**

---

**I, JAMES MORRIS, of a confidential address, will say as follows:-**

1. I am James Morris, MP for Halesowen and Rowley Regis.
2. I am providing this statement regarding issues of anti-social behaviour caused by car cruising in and around Manor Way (A456), Halesowen.

3. Between 2015 and December 2020, I received correspondence from five constituents, who had been in touch with me citing concerns in relation to vehicles travelling at excess speeds, and the safety of pedestrians crossing the A456 in Halesowen. However, since December 2020, I have been contacted by thirty-three constituents who have raised concerns about the particular problem of car cruising on the A456 from Manor Way to the other end of the road in Hayley Green. Since February 2021, I have held five Teams meetings with a small group of these residents, police officers and representatives from the Local Authority to gauge the impact that this is having on the lives of these residents and get an update on what action is being taken locally to alleviate the problem.
4. In January 2021, residents created a petition in change.org to request that greater action is taken to alleviate the problems being experienced with car cruising on the A456. I have publicised the petition on my Facebook page encouraging residents to sign it. I have also written to 1055 households on 27 different roads affected by car cruising at this location urging them to sign the petition and advising them to continue reporting any incidents to the Police as and when they occur. I understand that at the time of writing the petition has 844 signatories, which demonstrates the strength of feeling on this issue.
5. I know that car cruising along this stretch of road has a detrimental impact on the lives of affected residents. I am aware from my initial meeting with eight residents on this subject that incidents of car cruising



have proliferated and are frequently occurring during daylight hours as well as at night.

6. The residents attending the online meetings advised that they are experiencing problems with noise pollution caused by the heavily modified vehicles and fireworks being let off to give an all-clear signal, and as a result their sleep is being interrupted by car cruising too. I have also received written correspondence from 25 constituents who claim that car cruising is causing noise nuisance, and 12 of whom have claimed that either themselves or their children have experienced sleep deprivation due to incidents of car cruising occurring late at night or in the early hours of the morning. One such resident explained that a lack of sleep caused by the loud noises emitted from the vehicles involved has worsened his underlying mental health condition and consequently his GP has increased his medication. The same resident explained that his daughter has a health condition that causes chronic fatigue and incidents of car cruising have disturbed her sleep and exacerbated her condition.
7. I am aware that three constituents that have been in regular correspondence with me have been subjected to threats and intimidating behaviour from car cruisers, while they were gathering photos and video evidence of car cruising to report it to the Police. During one such incident in March 2021, the Police had to intervene due to the verbal threats made against one resident, which caused her considerable upset and distress.

8. Residents continued to report incidents of car cruising and experienced a bad incident and reported an event that took place on 12<sup>th</sup> August 2021 between the hours of 9.30pm and 11.15pm that evening.
9. Residents contacted me and explained that cars were parked up on the filing station and in the bus stops and also in the layby just past the lights where they were hiding amongst parked lorries. Around twelve to fifteen cars were involved in the racing and about six or seven spectators standing on the central reservation near the traffic lights. They were doing the usual circuit of round the motorway island, round Grange Island and back up Manor Way and sometimes slowing down for the lights to change as a signal before racing each other. This was then discussed at our regular meetings.
10. On 19<sup>th</sup> September 2021 a banned driver was arrested at an illegal street race on the A456, for driving at speed and racing along the dual carriageway into oncoming traffic. The driver also reversed and sped off at speed from a garage situation on the A456 turning onto Manor Lane and again driving into oncoming traffic. The driver was charged and later sentenced to 12 months in jail.
11. Over the last few months Dudley Council have been carrying out major works on this stretch of road with a number of different schemes taking place which has resulted in times the road being taken down to one lane. Works are continuing on this site by the Local Authority and is due to be completed in the coming weeks. Our group meetings have continued

while work is being undertaken at this location and at times there have been incidents reported of speeding vehicles mainly on a Sunday afternoon, but not at the level they had previously been.

12. I held my last meeting on 1<sup>st</sup> April 2022 with residents and Police and we discussed the great progress that had been made by everyone involved in tackling this issue. However, I was again contacted by constituents informing me of a further incident that took place on 8<sup>th</sup> April 2022, where several vehicles gathered on the Shell Garage. CCTV footage was reviewed by the Police and was being investigated further.
13. The problem still continues, and the fear the residents have is that once the major road works are completed the problem will surface again on the level it did prior to the works being started.
14. I am fully supportive of the Local Authorities involved in the reintroduction of an injunction in the Black Country which includes the A456 in my constituency.
15. I believe the facts stated in this statement to be true. I understand that proceedings for contempt may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.



Name of Claimant: Dudley Metropolitan Borough Council

Signed ..... Date 13<sup>th</sup> May 2022

Print Name in Full : JAMES George Morris

Signature .....

James Morris MP

Statement filed on behalf of:Dudley MBC  
Statement of: Stacy Hewerdine  
Statement No: 1  
Dated :10/05/2022  
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  
STACY HEWERDINE**

---

**I, STACY HEWERDINE, of a confidential address, will say as follows:-**

1. I am a Security Manager for Savills who own and manage the Merry Hill Centre and Waterfront area in Brierley Hill.
2. I am providing this statement regarding issues of anti-social behaviour caused by car cruising activities on the Waterfront car park which has

been identified by West Midlands Police as a hot spot for these activities in the Dudley borough.

3. Working with the onsite police and my security team, we actively monitor the visitor car park location known internally as Grey 7. A map of the car park is attached and marked "**SH1**".
4. Since approximately January 2022 we have had regular car cruise activities taking place on the aforementioned car park. These car meets occur on a pretty much nightly basis although around 3 months ago there was a lull for around 1 month when police started targeting the area and new signage was installed. Cars arrive anytime from around 6pm and there can be 30 or more vehicles at any one time. The occupants of the vehicles have been observed driving dangerously, doing donuts and hand brake turns and engaging in more general anti-social behaviour such as revving engines, smoking cannabis, littering, urinating etc.
5. If any anti-social behaviour is observed, in the first instance an external driver will attend the site and speak to the individuals involved. Around 70% of the time, these individuals will disperse when asked to do so although the driver is regularly subjected to threats and abuse before they move on. When they refuse to leave or become aggressive, a call is made to the onsite police team in line with our process across the whole site.

6. Security staff are routinely taking vehicle registrations and interacting with individuals regarding their conduct on site to build a picture of this issue and support actions by the Borough Council and the police to try and resolve the problem. I am aware that letters are sent by our onsite police team to vehicle registered owners to stipulate that such behaviour is not acceptable.
7. We have now installed a sign at the entrance to Grey 7 car park to stipulate that the car park is private and for the express use of Waterfront tenants and their visitors only. We are currently looking at the format of how the car park can be secured out of peak hours, but this is made challenging by the 24 hour nature of a number of businesses and visitors utilising the site offerings we have. A number of times that the barriers have been secured, individuals have driven across the landscaping to gain entry. We are currently making arrangements for boulders to be strategically placed to negate this from happening but each time we block off one access point, they find another area to gain access by driving over the pavement or over the landscaping.
8. We have also had several barriers and lamp posts damaged over the last few months. In addition approximately 2-3 months ago new white lines were painted on the car park marking out car parking spaces and lane markers but these have also been damaged through these individuals doing burn outs and hand brake turns. During last years snow, a vehicle was crashed into. It is an ongoing issue.

9. The security team are aware that these activities are causing concern for the many businesses and residents living near to the car park and complaints are often received, most recently on Friday 6<sup>th</sup> May 2022. Many of the businesses operate over a 24-hour period and the presence of a large group of, mainly males, in vehicles is intimidating to staff or residents returning to the car park alone. We often also receive complaints about littering and debris left in the car parks after these meets have taken place.
7. For the above reasons I fully support the application for an Injunction within Dudley and the Black Country.
8. I believe the facts stated in this statement to be true. I understand that proceedings for contempt may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Name of Claimant: Dudley Metropolitan Borough Council

Signed  ..... Date 10/05/2022 .....

Print Name in Full : ... STACY HEWERDINE.....

Statement filed on behalf of: Dudley MBC  
Statement of: Stacy Hewerdine  
Statement No: 1  
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  
STACY HEWERDINE**

---

This is the Exhibit referred to as "SH1" in the witness statement of Stacy Hewerdine



Write a description for your map.

- Legend**

  - bp
  - Cophorne Hotel Merry Hill-Dudley
  - Feature 1
  - Feature 2
  - Fun Fair
  - Starbucks Drive Thru
  - The Waterfront Inn - JD Wetherspoon
  - Waterfront Car Park
  - Waterfront Way

200m

200 m

Level 31

Level St

Google Earth

## 2. Background and Copernicus

Statement filed on behalf of: Dudley MBC  
Statement of: Stacy Hewerdine  
Statement No: 1  
Dated : 10.05.2022  
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**

---

**EXHIBIT SH1**

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This is the document referred to as "Exhibit SH1" in the witness statement of Stacy Hewerdine dated 10 May 2022.





EXHIBIT SH1 – Photograph of The Waterfront Car Park

Statement filed on behalf of:Dudley MBC  
Statement of: Richard Hubbard Harris  
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**

---

**WITNESS STATEMENT OF  
RICHARD HUBBARD HARRIS**

---

**I, RICHARD HUBBARD HARRIS, of a confidential address, will say as follows:-**

1. I am a General manager at Showcase Cinema, Castle Gate, Dudley.
2. I am providing this statement regarding issues of anti-social behaviour caused by car cruising activities on the cinema car park, which has been



identified by West Midlands Police as a hot spot for these activities in the Dudley borough.

3. The Showcase Cinema is at Castle Gate Park, Castle Gate Way, Dudley. We have a large car park at the front of the building which is shared by local restaurants such as Pizza Hut, Frankie and Bennies and Chiquitos. We also have a large car park at the rear and a smaller one to the side solely for use by cinema customers. A map of the Castle Gate complex showing the location of the cinema car parks and photographs of the front, rear and side cars parks are attached and marked "RHH1".
4. I have worked at Showcase, Dudley for 15 years and groups of youths have always gathered in the car park. However, the frequency of the meets and the anti-social behaviour have increased over recent years. The activities take place mainly on the car park at the rear and side of the cinema as it tends to be quieter, but they do occasionally also gather on the front car park. The rear car park is a very secluded area and is not overlooked by any houses or other businesses.
5. There is no particular pattern as to when the car meets occur. In the past it was mainly at weekends in the early hours of the morning when youths would meet up to play loud music. Now, sometimes it takes place at the weekend but also on weeknights too. The number of vehicles attending varies, although there is usually a minimum of 6 cars and on one occasion, in January 2022 when the UK was in lockdown and the cinema

was closed, I counted 130 cars present on the CCTV footage. It mainly tends to be young males, often 3-4 to car but there are a few young girls who attend too. Now they also start arriving from around 4pm onwards, when the cinema is still open. The occupants of the vehicles have been observed driving dangerously, speeding around both car parks, doing donuts and skidding, sometimes with someone sitting on the bonnet of the vehicle. Often the other occupants of the vehicle group together spectating and cheering the drivers' antics.

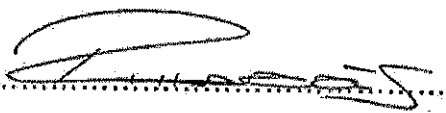
6. I recall one incident a few years ago when one driver had small children in car seats in his vehicle whilst he was driving at speed and skidding. I called the police to attend as I was concerned that he could crash and injure the children and himself.
7. The individuals in these vehicles also engage in general anti-social behaviour such as playing loud music, littering, throwing used gas cannisters on the ground and in the bushes, damaging drain channels and signposts, kicking footballs and reducing the car park spaces available for customers.
8. The presence of these youths and the dangerous driving and anti-social behaviour is intimidating for customers and poses a serious risk. Staff members and customers have expressed concern that if they were to lose control of their vehicle there would likely be a serious accident where they and members of the public could be badly injured or even killed. In the evenings customers often ask the security officer to keep

an eye on their vehicles as say they don't like leaving it in the car park with the youths there. Customers also often ask cinema security staff to walk them out to their cars as they are too afraid to go out alone.

7. For the above reasons I fully support the application for an Injunction within Dudley and the Black Country.
8. I believe the facts stated in this statement to be true. I understand that proceedings for contempt may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Name of Claimant: Dudley Metropolitan Borough Council

*Print Name in Full* : ... RICHARD HUBBARD HARRIS .....

Signature .....  .....

Statement filed on behalf of: Dudley MBC  
Statement of: Richard Hubbard-Harris  
Statement No: 1  
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**

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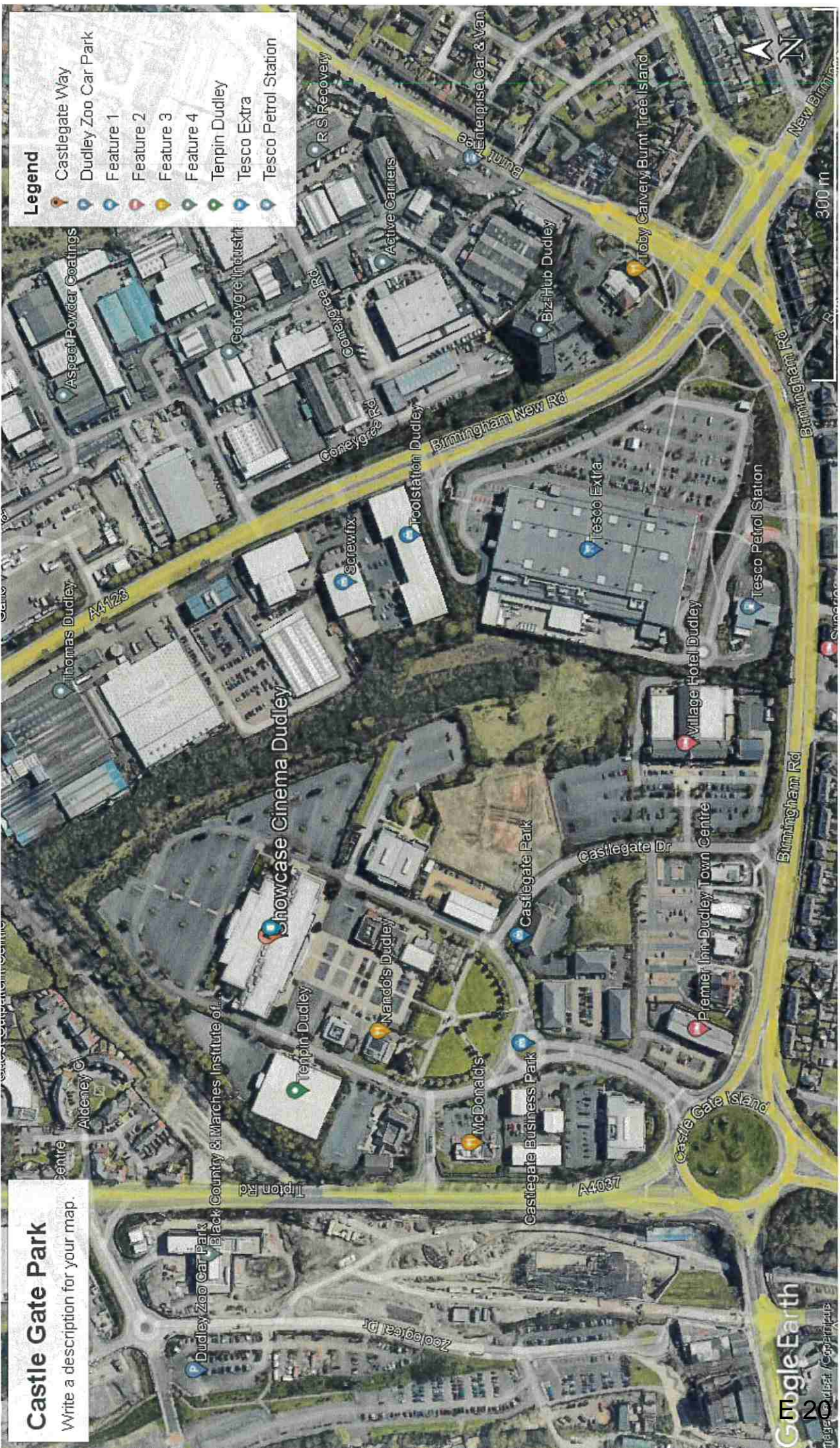
**WITNESS STATEMENT OF  
RICHARD HUBBARD-HARRIS**

---

This is the Exhibit referred to as "**RHH1**" in the witness statement of Richard Hubbard-Harris



"RHH1"



## Castle Gate Park

Write a description for your map.

- Legend**
- Castlegate Way
  - Dudley Zoo Car Park
  - Feature 1
  - Feature 2
  - Feature 3
  - Feature 4
  - Tenpin Dudley
  - Tesco Extra
  - Tesco Petrol Station

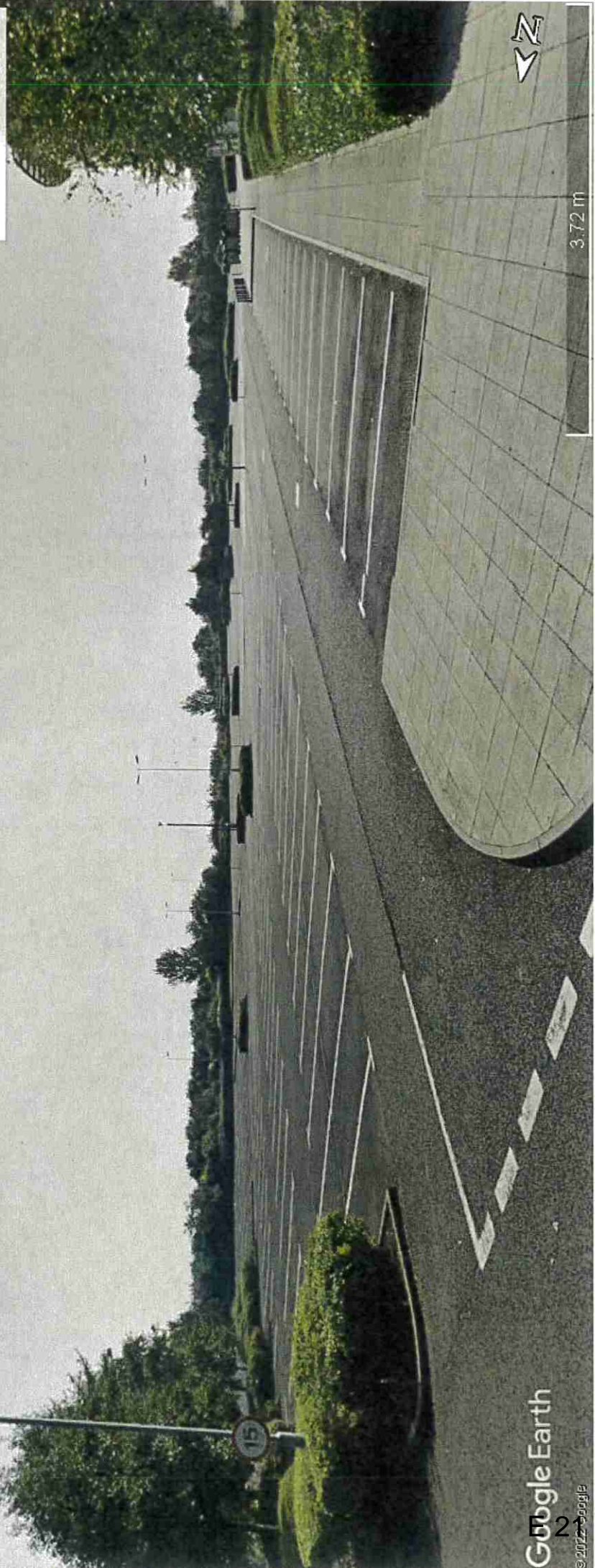


## Rear Car park of Showcase Cinema

Write a description for your map.

### Legend

- Castlegate Way
- Dudley Zoo Car Park
- Feature 1
- Feature 2
- Feature 3
- Feature 4
- Tenpin Dudley
- Tesco Extra
- Tesco Petrol Station



Google Earth

© 2012 Google

"RHH1"



## Front Car park of Showcase Cinema

Write a description for your map.

### Legend

- Castlegate Way
- Dudley Zoo Car Park
- Feature 1
- Feature 2
- Feature 3
- Feature 4
- Tenpin Dudley
- Tesco Extra
- Tesco Petrol Station

Google Earth

© 2022 Google

1.92 m

"RHH1"

Statement filed on behalf of: Dudley MBC  
Statement of: Richard Hubbard-Harris  
Statement No: 1  
Dated : 10.05.2022  
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**

---

**EXHIBIT RHH1**

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This is the document referred to as "Exhibit RHH1" in the witness statement of Richard Hubbard-Harris dated 10 May 2022.



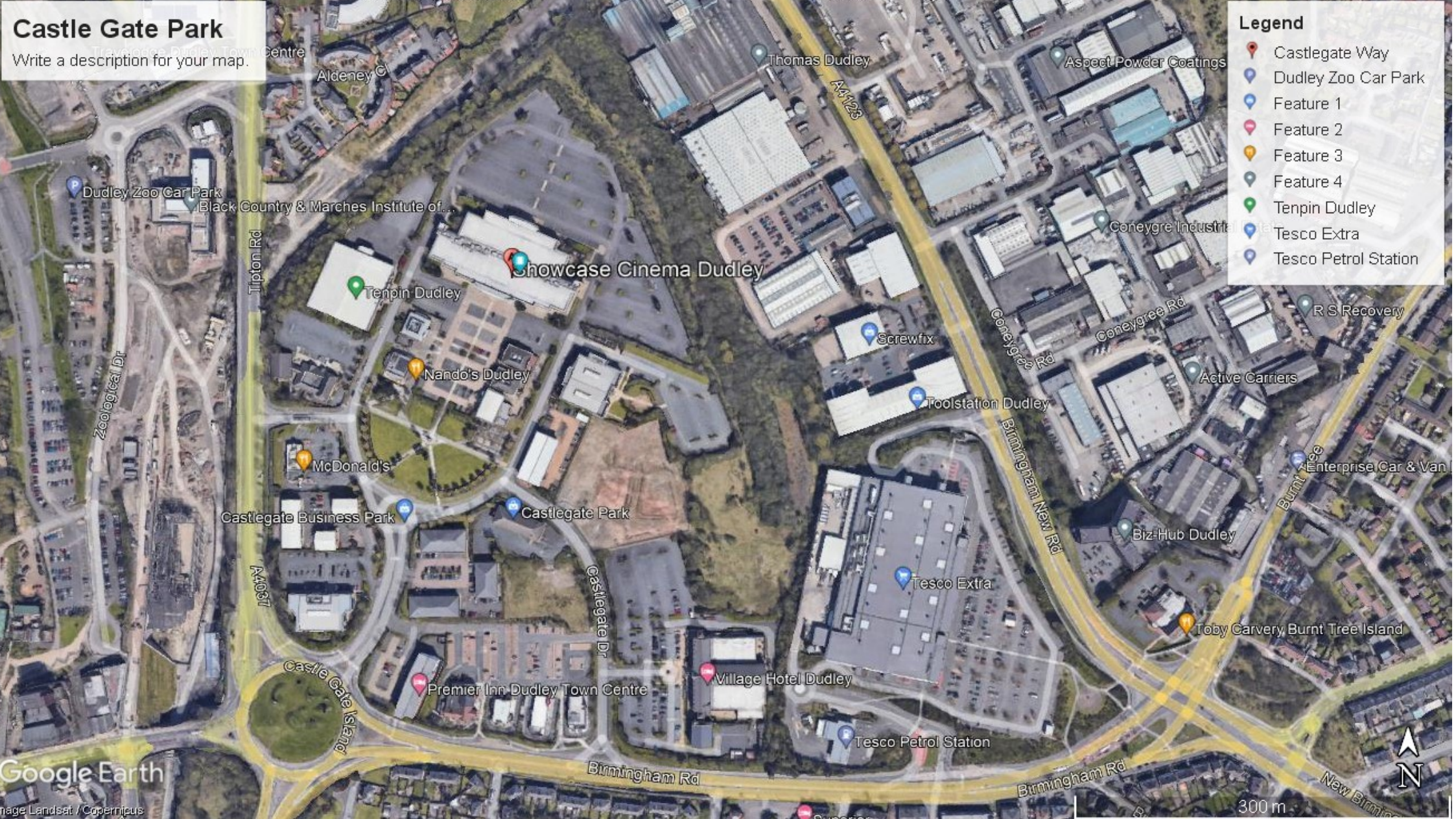


EXHIBIT RHH1 – Photo of Car Park



# Front Car park of Showcase Cinema

Write a description for your map.

- Legend**
- Castlegate Way
  - Dudley Zoo Car Park
  - Feature 1
  - Feature 2
  - Feature 3
  - Feature 4
  - Tenpin Dudley
  - Tesco Extra
  - Tesco Petrol Station



EXHIBIT RHH1 – Car Park (Front)

## Rear Car park of Showcase Cinema

Write a description for your map.

### Legend

- Castlegate Way
- Dudley Zoo Car Park
- Feature 1
- Feature 2
- Feature 3
- Feature 4
- Tenpin Dudley
- Tesco Extra
- Tesco Petrol Station



EXHIBIT RHH1 – REAR CAR PARK

Statement filed on behalf of: Dudley MBC  
Statement of: Richard Hubbard Harris  
Statement No: 2  
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**

---

**SECOND WITNESS STATEMENT OF  
RICHARD HUBBARD HARRIS**

---

**I, RICHARD HUBBARD HARRIS, of a confidential address, will say as follows:-**

1. I am a General manager at Showcase Cinema, Castle Gate, Dudley.
2. I am providing this statement further my previous statement dated 11<sup>th</sup> May 2022 regarding issues of anti-social behaviour caused by car cruising activities on the cinema car park.



3. Since my previous statement the car cruise activity on our car park has increased and is now a daily occurrence both during opening hours and overnight when the cinema is closed.
4. In my previous statement I referred to a particularly large incident involving 130 vehicles in January 2021 when the UK was in lockdown and the cinema complex was closed. I have managed to locate some CCTV footage from this incident and two short video clips of the incident are on the CD attached as exhibit '**RHH2**' and marked '**CCTV 02-01-21a**' – '**CCTV 01-01-21b**'. I also attach as exhibit '**RHH3**' some still images from the footage to show clearly how many vehicles were involved. Following this incident, cinema staff noted numerous bollards and signage had been damaged and needed to be replaced. They also caused damage to the drain covers due to parking in pedestrian areas.
5. During June and the first week of July, staff members employed by the cinema collected numerous empty nitrous oxide cannisters from the cinema car park and the surrounding undergrowth. A photograph of the larger cannisters, which were numerous enough to fill a shopping trolley, are attached and marked '**RHH4**'. There were also many smaller cannisters but these were disposed of before the photograph was taken. These cannisters are left on the car park by youths, some of whom are involved in the car cruising activity, as we have observed them on CCTV in the vehicles inhaling the nitrous gas from a balloon and throwing the empty cannisters onto the car park.

6. On 9<sup>th</sup> July 2022, from around 2.00am numerous vehicles are seen on CCTV entering the rear car park of the cinema. There appears to be a larger group and a much smaller group who pull up in separate areas of the car park. When the cinema is closed and the CCTV is unmanned, the cameras are set to pan around the car park continually however you can clearly see that one of the groups are driving at speed and performing stunts whilst the occupants of the vehicles take turns in recording the antics on mobile phones. The CCTC footage is marked **'CCTV 09-07-22'** on the CD as exhibit number **'RHH2'**. At 01.49 on the footage, it shows that one of the vehicles has crashed head on into a post in the car park. The post incorporates a 'methane vent' and spinner to allow methane from the ground to be released and we have several of these in the car park. The footage shows that the registration plates are removed from the vehicle and a damaged bumper thrown in the hedge before the group disperse. A photograph of a damaged car bumper is attached and marked **'RHH5'**.
7. On 21<sup>st</sup> August 2022 at around 10.30pm, whilst the cinema is open, the CCTV picks up a small group of vehicles parked towards the rear of the car park. Shortly after one of the vehicles, a black Audi A1, is seen reversing at high speed and crashes into some bollards close to the rear exit of the cinema. The CCTV footage is marked **'CCTV 21-08-22'** on the CD attached as exhibit **'RHH2'**. Whilst the crash occurs out of sign of the camera, the vehicle can clearly be seen reversing at speed at 00.59 on the footage. The aftermath of the crash showing that the



vehicle has mounted two of the cinema bollards can be seen from 01.10 onwards. The driver of the damaged vehicle and the occupants of the other vehicles present can be seen inspecting the damage and removing items from the vehicle, including removing the registration plates. Cinema staff went out to check on the driver and ascertain what had happened but were informed that the driver had left the scene. The drivers name was given to cinema staff by the group who remained at the scene and later in the evening the driver, a Mr Justin Harvey, later came into the cinema and confirmed his details and the registration of the vehicle. The police attended and removed the vehicle later the next day. Photographs of the damaged vehicle and bollards taken the following morning, 22<sup>nd</sup> August 2022, are attached and marked **'RHH6'**.

8. On 29<sup>th</sup> August 2022, which was a bank holiday, a large amount of vehicles began pulling into the rear car park of the cinema at around 3.30pm. The cinema was open and busy, as it usually is on Bank Holidays, particularly with families visiting with their children. Our CCTV shows vehicles streaming into the car park and parking up in small groups. I estimate that there were around 100 vehicles in total including cars, motorbikes, vans and 4x4s. Two clips from this footage are marked **'CCTV 29-08-22a'** and **'CCTV 29-08-22b'** on the disk exhibited as **'RHH2'**. Immediately after arriving a number of the group start driving at high speed and performing donuts between the parked vehicles, many of which belonged to people visiting the cinema. Staff members called to the police to attend but the group, having been on the car park

for around 45 minutes, left before the police arrived. During those 45 minutes the footage shows customers leaving the cinema and trying to make their way to their cars without being run down by this group. At the time several customers asked for Security staff to escort them out of the cinema because they felt intimidated and unsafe. You can clearly see from the footage that the public are at serious risk of injury from the antics of this group.

9. On 7<sup>th</sup> September 2022, it came to my attention that there was a post on social media advertising a car cruise on our car park on Saturday 10<sup>th</sup> September 2022 at 5pm. A copy of the Facebook post is attached and marked '**RHH7**'. Saturday evenings are our busiest time and I was extremely concerned that this meet would escalate into the usual racing and stunts putting my staff and customers at risk. I notified the Claimant and the Police and I arranged for extra security staff to be at work for a couple of hours early that evening to man the entrance to the rear car park and ensure that it was used by genuine customers only. The meet did not go ahead and we had no issues that evening that I am aware of. I understand that the police made contact with the organiser and asked him not to go ahead. However, I have been informed that the meet has been re-arranged to Saturday 24<sup>th</sup> September 2022 so, again I will need to find additional staff to man the rear car park entrance and try and prevent this activity taking place.

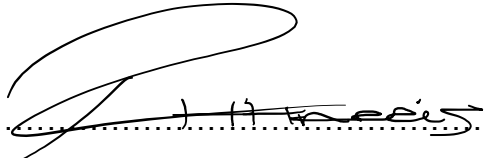
10. On 12<sup>th</sup> September 2022 from around 9pm until 11pm, there was another group on the car park, racing around and congregating. I have included footage of this incident, marked '**CCTV 12-09-22**' on the disk exhibited as '**RHH2**' as an example of what we experience on a daily basis. Coincidentally, on 13<sup>th</sup> September 2022, when Mrs Bradley from Dudley MBC Legal Services and PC Edwards from West Midlands Police attended the cinema to collect the CCTV footage, there were three vehicles racing at speed and doing donuts in the rear car park at 3.30pm in the afternoon. PC Edwards spoke to the group and took registration numbers.
11. In the last four weeks alone, car cruising activity in our car parks has caused approximately £2500 worth of damage to our car park furniture and signage. Attached as exhibit '**RHH8**' are photographs of a lamppost and bollard at the front of the cinema which were damaged on or around 14<sup>th</sup> August 2022. This was a particularly expensive repair as we had to pay for a crane to remove and replace the damaged lamppost due to its height.
12. I feel that since the injunction lapsed, car cruise activity has increased significantly and continues to do so. Our car park has become a magnet for this activity and is putting my staff and customers at risk. I am also concerned that customers who encounter this activity will be put off from returning to the cinema and this will affect the business long-term.

13. For the above reasons I fully support the application for an Injunction within Dudley and the Black Country.

14. 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

Dated .....14.9.22.....

Signature ..........<sup>1</sup>

Print Name in Full : ... RICHARD HUBBARD HARRIS .....

i) Statement of: Richard Hubbard-Harris  
ii) Statement No: 2  
iii) For: Claimants  
iv) Dated: 14.09.2022  
v) Exhibits: RHH2 – RHH8

**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**

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**EXHIBIT RHH2**

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**This is the document referred to as Exhibit RHH2 in the witness statement of Richard Hubbard-Harris dated 14 September 2022.**

This is in fact CCTV footage that is available separately.

i) Statement of: Richard Hubbard-Harris  
ii) Statement No: 2  
iii) For: Claimants  
iv) Dated: 14.09.2022  
v) Exhibits: RHH2 – RHH8

**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**

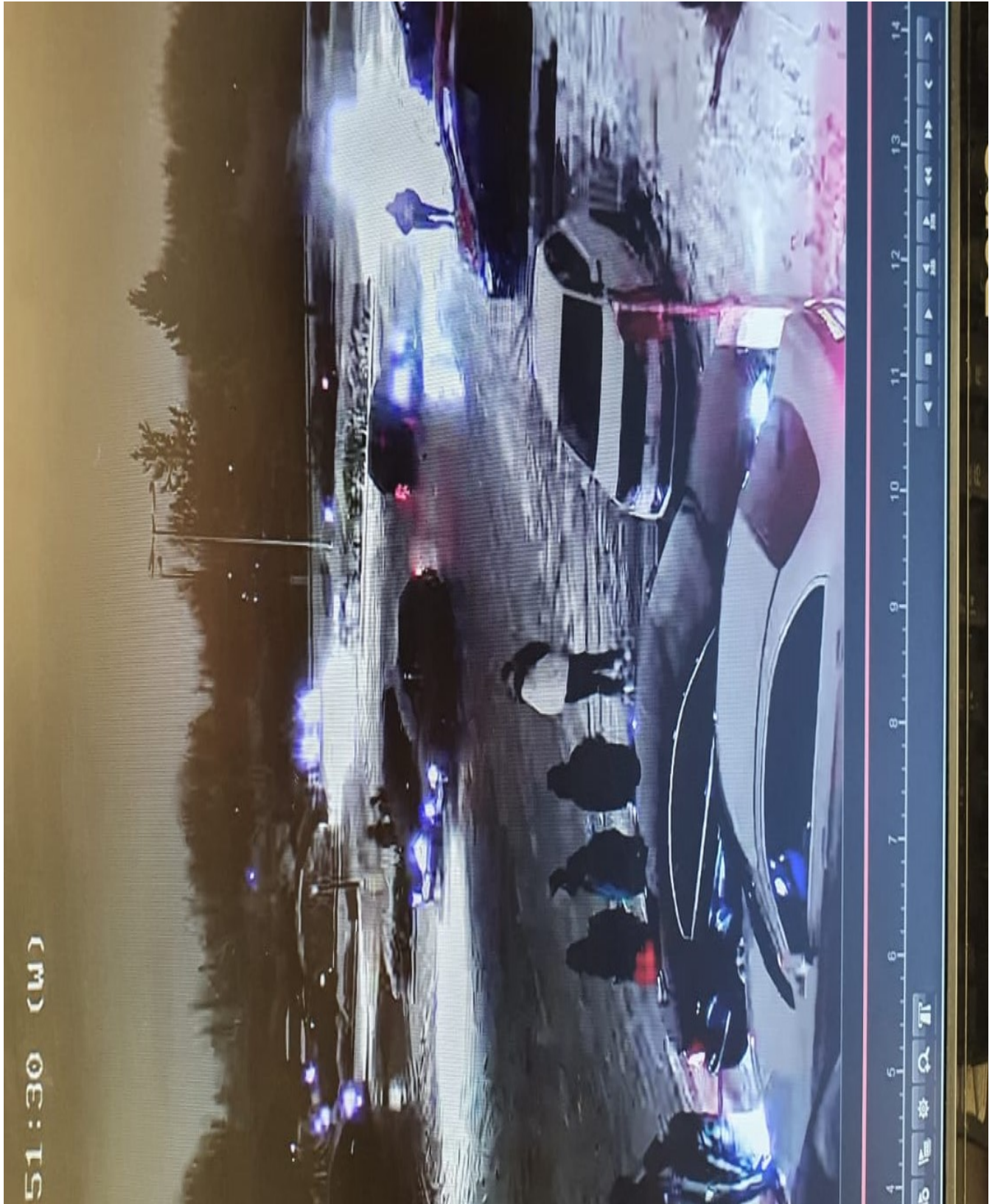
**Defendants**

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**EXHIBIT RHH3**

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**This is the document referred to as Exhibit RHH3 in the witness statement of Richard Hubbard-Harris dated 14 September 2022.**















i) Statement of: Richard Hubbard-Harris  
ii) Statement No: 2  
iii) For: Claimants  
iv) Dated: 14.09.2022  
v) Exhibits: RHH2 – RHH8

**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**

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**EXHIBIT RHH4**

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**This is the document referred to as Exhibit RHH4 in the witness statement of Richard Hubbard-Harris dated 14 September 2022.**





i) Statement of: Richard Hubbard-Harris  
ii) Statement No: 2  
iii) For: Claimants  
iv) Dated: 14.09.2022  
v) Exhibits: RHH2 – RHH8

**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**

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**EXHIBIT RHH5**

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**This is the document referred to as Exhibit RHH5 in the witness statement of Richard Hubbard-Harris dated 14 September 2022.**





i) Statement of: Richard Hubbard-Harris  
ii) Statement No: 2  
iii) For: Claimants  
iv) Dated: 14.09.2022  
v) Exhibits: RHH2 – RHH8

**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**

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**EXHIBIT RHH6**

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**This is the document referred to as Exhibit RHH6 in the witness statement of Richard Hubbard-Harris dated 14 September 2022.**









i) Statement of: Richard Hubbard-Harris  
ii) Statement No: 2  
iii) For: Claimants  
iv) Dated: 14.09.2022  
v) Exhibits: RHH2 – RHH8

**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**

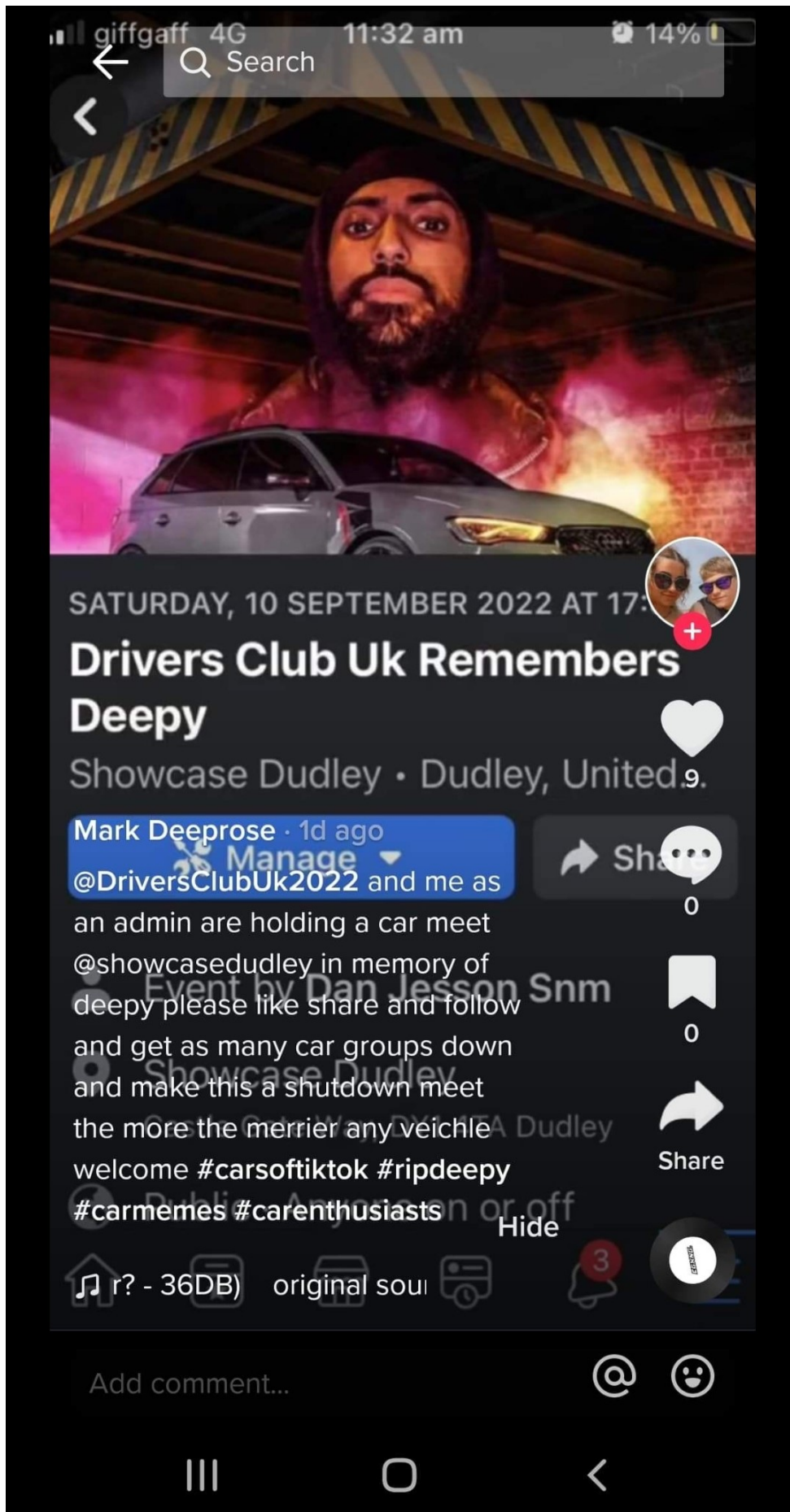
**Defendants**

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**EXHIBIT RHH8**

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**This is the document referred to as Exhibit RHH8 in the witness statement of Richard Hubbard-Harris dated 14 September 2022.**



i) Statement of: Richard Hubbard-Harris  
ii) Statement No: 2  
iii) For: Claimants  
iv) Dated: 14.09.2022  
v) Exhibits: RHH2 – RHH8

**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**

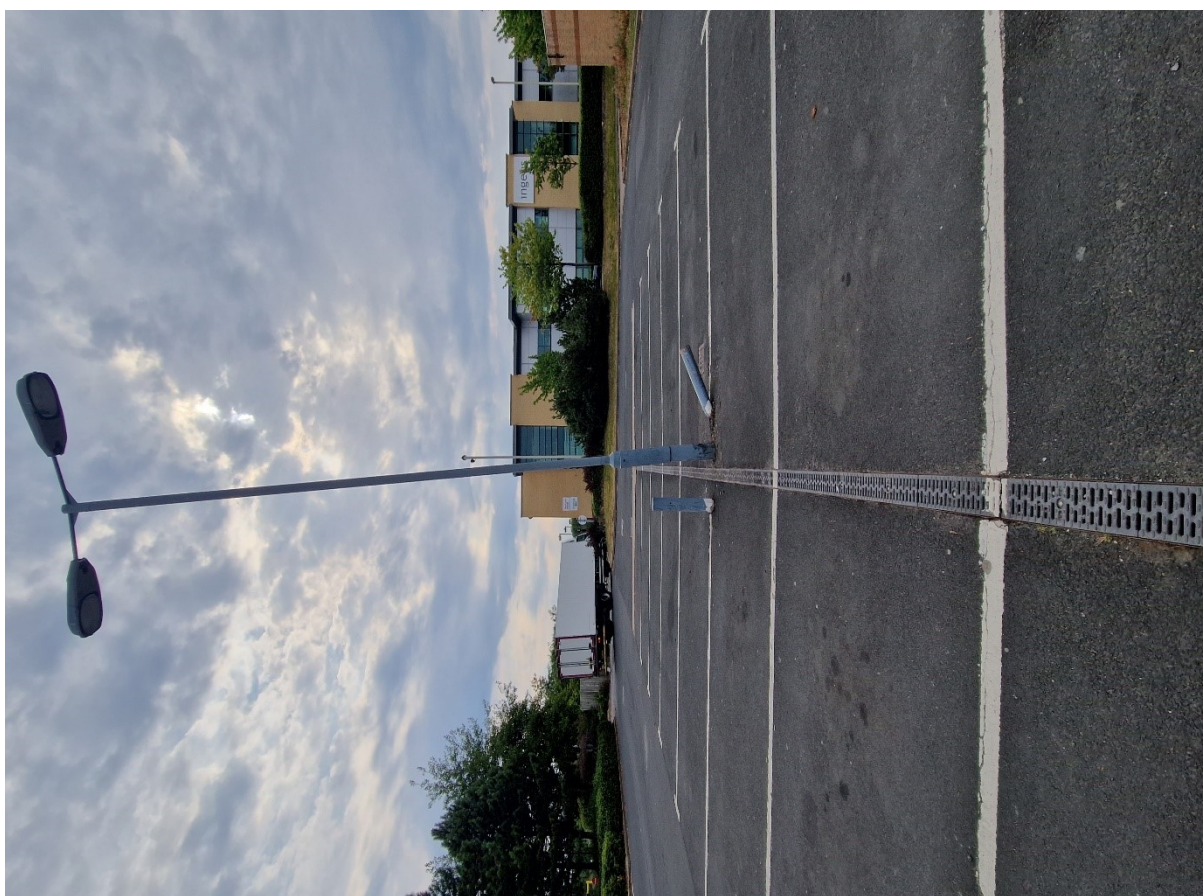
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**EXHIBIT RHH8**

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**This is the document referred to as Exhibit RHH8 in the witness statement of Richard Hubbard-Harris dated 14 September 2022.**





Statement filed on behalf of: Dudley MBC  
Statement of: John Slater-Kiernan  
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**

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**WITNESS STATEMENT OF  
JOHN SLATER-KIERNAN**

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I, JOHN SLATER-KIERNAN, of a confidential address, will say as follows:-

1. I am the Manager at Shell Petrol Station, Manor Way, Halesowen,  
West Midlands, B62 8RJ.

2. I am providing this statement in regards to issues of anti-social behaviour caused by car cruising in and around Manor Way (A456), Halesowen.
3. Over the last two years it has been brought to my attention from customers and residents living in the vicinity of the petrol station that the forecourt and car park area is being used by car cruisers/street racers as a meeting point, usually on Friday and Saturday evenings. Often it starts with one or two cars coming in for petrol and then more and more arrive and they congregate on the car park for around 20/30 minutes. I have told my staff to call the police if this happens and, when police do arrive, the group always disperse very quickly.
4. Although I have not witnessed it myself, I am aware from conversations with the police, staff and customers that these car cruisers use Manor Way like a race track, speeding along the dual carriageway from one roundabout to the other. I believe that these activities also attracts spectators.
5. I recall one Sunday morning, I do not remember the date but it was within the last 12 months, I received an email from Shell to say that they had received a complaint from a resident living in the vicinity. The resident reported that over the weekend, they had been to the petrol station to take photographs of a large group of approximately 20 vehicles as they had been stress racing and driving dangerously. I checked the CCTV footage for the relevant evening and could see that there was a large

group of cars parked up on the forecourt of the garage. On the CCTV some of the group were doing wheel spins and one was doing donuts.

6. At night and into the early hours of the morning Manor Way is usually very quiet and not many cars are around. These car cruisers often have souped up vehicles with loud engines which do cause a lot of noise nuisance. In addition, large numbers of youths congregating on the forecourt and car park is very intimidating and could put off customers from coming to the garage, especially as customers would have to drive past the group in order to get to the fuel pumps.
7. On Sunday 8<sup>th</sup> May 2022, I was searching our CCTV footage in respect of another matter and noticed that the previous evening, 7<sup>th</sup> May 2022 at around 11pm, a large group of vehicles pulled into the garage within a few minutes of each other. On viewing the footage, they appear to be mainly young males in high performance cars. They parked up on the forecourt and car park area and remained for around 20 minutes before all leaving together. Although they did not engage in any anti-social behaviour on this occasion it is clear that they were travelling as a group. Also, around the same time the CCTV footage picked up several vehicles driving at high speed on the opposite side of the dual carriageway. Although I cannot say for sure, I believe that it may be same vehicles. A clip of the CCTV footage, which covers 20 minute period and shows the group arriving and leaving is attached as exhibit “**JSK1**” but I have speeded up the footage to make it easier for the court to view.

7. For the above reasons I fully support the application for an Injunction within Dudley and the Black Country.
8. I believe the facts stated in this statement to be true. I understand that proceedings for contempt may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Name of Claimant: Dudley Metropolitan Borough Council

Signed .....  ..... Date ..... 11/05/2022 .....

Print Name in Full : .....JOHN SLATER-KIERNAN.....

Statement filed on behalf of: Dudley MBC  
Statement of: John Slater-Kiernan  
Statement No: 1  
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  
JOHN SLATER-KIERNAN**

---

This is the Exhibit referred to as "JSK1" in the witness statement of John Slater-Kiernan

**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**

---

**EXHIBIT JSK1**

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The document referred to as "Exhibit JSK1" in the witness statement of John Slater-Kiernan dated 11 May 2022 is in fact CCTV footage recorded 7 May 2022 which is available separately.



Statement filed on behalf of: Dudley MBC  
Statement of: Chris Southall  
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**

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**STATEMENT OF  
CHRIS SOUTHALL**

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**I, CHRIS SOUTHALL, of a confidential address, will say as follows:-**

1. I am the Store Manager at Tesco Extra, Birmingham Road, Dudley, DY1 4RP.
2. I am providing this statement regarding issues of anti-social behaviour caused by car cruising in the Tesco car park.

3. I have only been Store Manager at Tesco, Dudley for 10 weeks but since I started in this role staff members have made me aware that there is a culture and history of car cruise/boy racer activity in the Tesco car park. The main activity seems to be focused on the car park situated directly underneath the store, but I believe that it also takes place in the large outside car park also. Staff members informed me that the activity takes place mainly at weekends but occasionally on weekdays too.
4. Whilst many staff members have reported such issues, I have never personally witnessed any such issues due to my usual shift pattern. However, I worked nights in the week commencing Monday 2<sup>nd</sup> May 2022 and on Wednesday 4<sup>th</sup> May, Thursday 5<sup>th</sup> May and Friday 6<sup>th</sup> May I witnessed a group of youths in cars congregating in the car park. The below store car park takes on a different feel during the evening and it feels very isolated. Each evening as soon as I got out of my car, I noticed 7 or 8 vehicles parked closely together with a group of, mainly male, youths standing around chatting. Immediately I noticed a strong, almost overpowering smell of cannabis coming from their direction. One evening they all had their lights on and were playing with a football in the car park. I can confirm that at least two members of the group were there on each of the three days I observed them in the car park.
5. The store closes at 12.00pm until 6.00am each evening and, except for Friday evenings the store is fairly quiet late at night. On the days that I observed the youths in the car park, whilst working inside the store I

could clearly hear them revving their engines, screeching their tyres and racing at speed in the car park below me.

6. On checking the CCTV footage I noticed that the group of youths I had seen left the store around store closing time but during the night, several other groups of youths in cars pulled into the car park to congregate and drive around at speed. Unfortunately, due to a technical issue we are experiencing at the moment, although I can view the CCTV footage, I cannot copy it to disk to exhibit as evidence. I am hoping to have this issue resolved soon.
7. I did not see it for myself but staff members who regularly work evenings have informed me that they have seen drivers of vehicles doing stunts in the car park, donuts, hand brake turns and drag racing. As this activity is taking place during store opening hours, I am extremely concerned that it poses a serious risk to both staff and customers. Having smelt the cannabis, I am now even more worried as driving at speed is dangerous enough but driving at speed whilst impaired by drugs poses even more risk of an accident occurring. I have been informed that a young girl died on the Tesco car park several years ago and I do not want this to ever happen again.
8. We do not often receive complaints from customers regarding these activities in the car park and I believe that this is because we have fewer families with children or older people shopping in the evening. It tends to be the younger generation who are maybe less intimidated by these

activities. However, it is extremely intimidating for my staff who are leaving the store in the early hours and being confronted by large groups of youths driving dangerously in the car park. When staff are feeling intimidated, we do call the Police for assistance who attend when they are able to but are often unable to come out to us as officers are dealing with other, higher priority, calls.

9. As Store Manager I am actively looking at ways I can stop or at least reduce these activities. We currently have barriers to the under store section of the car park which have not been used for some time. However, we intend to start locking these barriers during the evening to prevent the car cruisers from gathering there and using the car park like a racetrack. Obviously, I have to balance this with the needs of the store regarding the availability of car parking spaces for staff and customers during the evening so a decision is yet to be made as to what time they will be closed.
10. For the above reasons I fully support the application for an Injunction within Dudley and the Black Country.
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

*Signed ...Chris Southall..... Date ...13/05/2022.....*

*Print Name in Full : .....CHRIS SOUTHALL.....*

## **F. SECTION F - Statements of Councillors, MPs, Residents and Businesses for Sandwell**

## 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 Sheila POWELL

Age if under 18 Over 18 (if over 18 insert "over 18")

Occupation Retired

This statement (consisting of 2 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: (witness) S Powell

Date 10/06/22

Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am the above named person and I reside [REDACTED] in [REDACTED] GLOVER STREET, WEST BROMWICH. I have lived at this address for approximately 20 years. SP

I am providing this statement in relation to current and long standing issues with street racing and car cruising on KENRICK WAY, WEST BROMWICH.

I would describe KENRICK WAY as a Dual carriage way, with a 40 MPH speed limit. The Road is generally very busy with normal vehicles and other road users and is well used during the day, however is much quieter on the night time.

SP  
I have lived at my address for approximately 20 years now and I live on the 7<sup>th</sup> floor. My flat looks out onto KENRICK WAY and the island at the junction of KENRICK WAY and TRINITY WAY. Since I have lived at this address this area has suffered with a large scale Antisocial Behaviour where street racers have been using the road as a race track. They regularly meet on the Weekends Saturday and Sundays between the hours of 8.30pm – 12.00am and sometimes are there until the early hours. They will race up and down all night and their cars are very loud. They do this from the islands at TRINITY WAY and TELFORD WAY and continuously loop around back and forth doing several laps at high speed. These vehicles are very fast and are very loud which is quite intimidating and frightening.

Signature

S Powell

Signature witnessed by

03/2016

OFFICIAL – (when complete)



OFFICIAL – (when complete)

MG11

Crime No.

URN

Statement of Sheila POWELL

When the racing is happening i also see large groups of people spectating from the grass verge on KENRICK WAY and right outside my flats and the CRICKETERS ARMS. I have seen spectators urinating by my flats and up the side of the pub. Large groups of cars, sometimes more than 30 park on the roadside and around the traffic islands whilst watching the street racers.

I always see motorbikes as well and they go up and down extremely fast on one wheel which to me is very dangerous and someone is going to get killed at some point.

When the racing is happening i can never get any sleep. the noise that comes from the cars and the spectators is just awful and i am so tired the next day which doesn't help my health condicions as i suffer from arthritis and heart problems.

*SP*  
I did ~~not~~ live here when the last injunction was in place, *and SP* but i fully support a new one as anything has to be better than how it is now.

I ring the police regularly when they are here and always see police in the area and sometimes see the police helicopter and vehicles in the area which makes us feel much safer. I was always reassured by the Police when i contact them regarding their efforts to crack down on this problem, however these street racers are still congregating some weekends and causing a nuisance.

I welcome the new application of the Injunction in the Black Country and fully support the local counsils and police in its application.

Signature

*S Powell*

Signature witnessed by

03/2016

OFFICIAL – (when complete)

## 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 Ronald Hill

Age if under 18 Over 18 (if over 18 insert "over 18")

Occupation Retired

This statement (consisting of 2 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: (witness) *R J Hill*

Date 31/05/2022

Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am the above named person and I reside on GLOVER STEET, WEST BROMWICH, with my wife. I have lived at the address for approximately 42 years.

I am providing this statement in relation to current and long standing issues with street racing and car cruising on KENRICK WAY, WEST BROMWICH.

I would describe KENRICK WAY as a Dual carriage way, with a 40 MPH speed limit. The Road is generally very busy with normal vehicles and other road users and is well used during the day, however is much quieter on the night time.

KENRICK WAY has suffered over a number of years with a large scale Antisocial Behaviour where street racers have been using the road as a race track. They regularly meet on the Weekends Saturday and Sundays between the hours of 8.30pm – 12.00am and sometimes have been there as late as 2am. They will race in groups or two side by side. They do this from from the islands at TRINITY WAY and TELFORD WAY and continuously loop around back and forth doing several laps at high speed where I suspect they easily exceed 70MPH. I can tell these vehicles are high powered vehicles as they are very loud which is quite intimidating and frightening.

I have been personally driving for around 48 years and it shocks me how dangerous some of them are in their maneuvers as their driving is putting other road users safety at risk.

Signature *R J Hill*

Signature witnessed by .....

03/2016

OFFICIAL – (when complete)

**WITNESS STATEMENT****Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B****Investigation No.****Case Number**

Statement of: Mrs Nicki Wellings

Age if under 18: over 18 (if over 18 insert "over 18")

Occupation: Store manager

This statement (consisting of 1 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.

**Date:** Saturday, 11 June 2022**Signature:**Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am the above named person. I am making this statement in relation to the car cruising along the Black country route in Bilston. The racing has been going on for 5 or 6 years, this happens every weekend on a Saturday and Sunday night between 22:00 and 00:15 with cars racing up and down the road and drifting around the island opposite our house. It is mainly the noise which affects us, we are not able to sleep until the racers leave and don't go to bed until it finishes, sometimes very late. We know when the racing is about to start as we see them all park in Withy Road and cut through the gully which goes to the Black country route to spectate. This affects us in our home as the racing dictates what time we are able to go to bed, this is happening every weekend and affects mine and my family's sleep. My daughter is currently doing her GCSEs and my husband has to get up at 04:00 in the morning to go to work, this can really affect them as my husband can sometimes only have a couple of hours sleep a night due to the noise and if my daughter has an exam she needs the rest prior to this.

*I believe the facts stated in this witness statement and as amended in any tracked changes [and initialled] are true.*

Signature:

Signature witnessed by: Matthew Denny 24077

Signature:

Signature witnessed by: Matthew Denny 24077

OFFICIAL – (when complete)

MG11

## 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 John Gallagher

Age if under 18 Over 18 (if over 18 insert "over 18")

Occupation Retired

This statement (consisting of  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: 

\_\_\_\_ (witness)

Date 31/05/22

Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

My name is John Gallagher and I live at [REDACTED] in Maria Street, West Bromwich. . I am making this statement in relation to the ongoing street racing that has been occurring daily, on Kenrick Way in West Bromwich.

I have lived at [REDACTED] in West Bromwich for the past 22 years. The property is a block of flats which located next to Kelvin Way. The Kelvin Way expressway is located off Spon Lane which is an extremely busy dual carriageway leading up to junction 1 of the M5 which enables the cars to drive achieve really fast speeds.

Problems have been occurring with street racing on Kelvin Way for the past 8 years, with a huge number of various cars all of different colours and models racing each other along Kelvin Way. Some of these cars are the type meant for race tracks and wouldn't look out of place at the Monte Carlo. The vehicles numbers range from between 20 and 100 cars, but the majority of the time there is between 35 and 40 cars as I count them when I can.

The noise these cars make is terrible and they sound like fireworks going off. This has happened daily for the last 3 years between the hours of 7.30pm 8.45pm. They appear for around for 15 mins and take up both lanes on Kendrick Way, they tend to head towards West Bromwich and turn at the island by the Cricketers Arms Public House and and head the opposite way along the expressway. This means at times both laness on either side of the road are taken up with street racers.

The manner in which they drive are disgraceful with various vehicles weaving in and out of traffic. This is especially evident when they turn up a bit earlier at 4.30pm as this is the time where people travel. The way that they drive combined with the noise they make is causing me so much stress. I cannot get a good night sleep because of them and the way their exhausts go off and the noise they make to the point where it makes me jump out of bed.

Signature .....

Signature witnessed by .....

03/2016

OFFICIAL – (when complete)

OFFICIAL – (when complete)

MG11

Crime No.

URN

Statement of John Gallagher

It did get better and the cars didn't come around as much, i cant remember when exactly, but i think it was around Covid time. There was noticably no racers on Kendrick Way at this time and my life was peaceful for a short period. Normal service resumed shortly after though with up to 100 cars

The racers' have started to drive from Kendrick Way onto a slip road which leads to a nearby industrial estate that contains steelworks I think. Cars have been parking up for hours at a time smoking joints and I've also seen them smoking shisha pipes. They leave all their rubbish behind and have been observed urinating at the steelworks when parked up which is disgusting.

Obviously the behaviour of the drivers is unacceptable and the noise especially, would really affect the lives of the elderley and babies in the area

I fully support the Councils plans to implement a new injunction. I have recieved letters from councilor Nicola Richards and totally support the plans to get a new injunction put in place. I was aware of a previous injunction and I do think it would be effective, although I do think the signposting needs addressing, as the previous injunction signs were not easily visible and I walked past them on numerous occasions. I would like to see them made bigger so it would be clearer for residents such as myself that the injunction was in place.

The issue has been slowly getting worse, I can think of 3 accidents in the last 2 years at the location, one of which ended with a male needing hospital treatment after a car crash. Due to the congregation of racers, the ambulance couldnt get through initially and had to take a longer route to get to the accident. *gy*

Signature *gy*

Signature witnessed by .....

03/2016

OFFICIAL – (when complete)

## 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 Donata Halasa

Age if under 18 Over 18 (if over 18 insert "over 18")

Occupation Housewife

This statement (consisting of 2 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: (witness) *Halasa*

Date 10/06/2022

Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am the above named person and I reside on the  of GREENFORD HOUSE, MARIA STREET, WEST BROMWICH, with my husband and two young children aged 12 and 6 years. I have lived at the address for approximately 6 years.

I am providing this statement in relation to current and long standing issues with street racing and car cruising on KENRICK WAY, WEST BROMWICH.

I would describe KENRICK WAY as a Dual carriage way, with a 40 MPH speed limit. The Road is generally very busy with normal vehicles and other road users and is well used during the day, however is much quieter on the night time.

For the whole duration I have lived in GREENFORD HOUSE, KENRICK WAY has suffered with large scale Antisocial Behaviour where street racers have been using the road as a race track. They regularly meet on the Weekends Saturday and Sundays between the hours of 8.30pm – 12.00am and sometimes have been there as late as 2am. They will race in groups or two side by side. They do this from the islands at TRINITY WAY and TELFORD WAY and continuously loop around back and forth doing several laps at high speed where I suspect they easily exceed 70MPH. I can tell these vehicles are high powered vehicles as they are very loud which is quite intimidating and frightening.

I have been personally driving for around 20 years and have never seen such dangerous driving as some of them are in their maneuvers as their driving is putting other road users safety at risk.

Signature *Halasa*

Signature witnessed by .....

03/2016

OFFICIAL – (when complete)

OFFICIAL – (when complete)

MG11

Crime No.

URN

Statement of Donata Halasa

I have also observed large groups of people spectating from the grass verge on KENRICK WAY and right outside my flats. Large groups of cars, sometimes more than 30 park on the roadside and around the traffic islands whilst watching the street racers. They can be loud and stand there watching and recording the racing on their mobile phones.

When the racing is happening it is fair to say you cannot get any sleep. the noise that comes from the cars and the spectators is horrendous.

My two young children are both of school age and when the racing is happening it wakes them, sometimes at 2am in the morning and my youngest wakes up crying and scared as the noise is so loud and intimidating. This then has a knock on effect the next day as they are both tired and lethargic for school.

It is for this reason I constantly ring the police as it is not fair that my children are subjected to that.

I regularly see police patrols in the which makes us feel much safer. I was always reassured by the Police when I contact them regarding their efforts to crack down on this problem, however these street racers are still congregating some weekends and causing a nuisance.

I welcome the new application of the Injunction in the Black Country and fully support the local councils and police in its application.

Signature .....

03/2016

Signature witnessed by .....

OFFICIAL – (when complete)





# 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.*

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

**WITNESS STATEMENT****Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B****Investigation No.****Case Number**

Statement of: Mrs Simon Pearson

Age if under 18: 0 (if over 18 insert "over 18")

Occupation:

This statement (consisting of 2 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.

The statement has been taken over the telephone by Ness Morgan on 28/04/2022. The declaration above has been read over and explained to me and I understand that this statement may be used in court as evidence.

**Signature:** .....**Date:** .....Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am the above named person and I reside at the address overleaf.

I have been contacted today by PC 23193 MORGAN of West Midlands Constabulary in relation to a call I made to Police back in August 2020, log 3620-140820 refers. The call was in relation to various vehicles racing up and down the street, doing doughnuts and revving their engines near to my place of work. Approx half a dozen very expensive looking vehicles would gather on the bridge above near Birchalls, Walsall. There were normally Lamborghinis, Ferrari's, and high powered BMW's, they would show up during the afternoon mainly. I thought the vehicles looked like hire vehicles as they are such expensive vehicles and there were always lots of them in various colours.

I had a business near there at the time and it really used to stress me out as my customers would leave their vehicles with me for repair then maybe walk into town or get a bus, however when they would need to return to get their vehicles these cars would be racing at very high speeds, doing doughnuts etc and would frighten my customers. I was sure that one day somebody would be killed crossing the road due to their very erratic behaviour. I have since sold the business to developers and I am aware now that the roads have been changed and are narrower in places and have bollards in place however in my opinion I am not sure if this is good or bad as I do not believe that enough has been done to address these issues.

I called the Police lots of times over the issues with the racing cars but it seemed like not much was being done. Although I no longer work there I am aware that these type of vehicles doing this should be clamped down on before someone gets killed.

*I believe the facts stated in this witness statement and as amended in any tracked changes [and initialled] are true.*

Signature: .....

Signature witnessed by: .....

Parent/guardian signature: .....

Reference: TS1053683455

**Investigation No.**

**Case Number**

Statement of: Mrs Simon Pearson

Signature: .....

Parent/guardian signature: .....

Signature: .....

Signature witnessed by: .....

Parent/guardian signature: .....

Reference: TS1053683455

**WITNESS STATEMENT****Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B****Investigation No.****Case Number**

Statement of: Mrs Kelly Matthews

Age if under 18: over 18 (if over 18 insert "over 18")

Occupation: unemployed

This statement (consisting of 2 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.

The statement has been taken over the telephone by Ness Morgan on 28/04/2022. The declaration above has been read over and explained to me and I understand that this statement may be used in court as evidence.

**Signature:** .....**Date:** .....Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am the above named person and I reside at the address overleaf.

I have been contacted by PC 23193 MORGAN in relation to the boy racers I have reported to the police in the past log 111-230721 refers. This has been an ongoing issue since June 2021 and I have lost count of the amount of time I reported this to the Police but nothing seems to be getting done. It is always the same 5/6 vehicles. 4 Lamborghinis, a green one, red one, white one and blue one along with a grey VW Audi. They race up and down Green Lane, Walsall and are continually revving their engines outside my address between the hours of 1am and 3am and this happens most nights.

I suffer with really bad anxiety, depression, panic attacks and all this is making things worse. I do not get any sleep and neither does my husband. I lost my father on the 9th April 2022 and all these ongoing issues with these cars is not helping me at all.

I live on the 6th floor of a block of flats and the noise is so loud even from that many floors up. I think they do a loop from outside my flat then head towards Birchills, Hospital Street past the Fire Station towards Stafford Street. They drive so fast that there is going to be an accident. They are clearly racing each other as it is always the same cars every time.

I really wish something could be done to stop this and to give me some peace especially at this stressful time with my dad passing away.

*I believe the facts stated in this witness statement and as amended in any tracked changes [and initialled] are true.*

**Signature:** .....

Signature: .....

Signature witnessed by: .....

Investigation No.

Case Number

Statement of: Mrs Kelly Matthews

Signature: .....

Signature witnessed by: .....

## 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 Julia ann westwood

Age if under 18 Over 18 (if over 18 insert "over 18")

Occupation House wife

This statement (consisting of Two 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: (witness) J WESTWOOD X NOT SIGNED

Date 13/05/2022.

Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am the above name person and I live at the address overleaf.

I have been asked to give an impact statement in regard to matters of Anti Social Behaviour, caused by car cruising, and incidents of illegal car races on the Black Country Route situated near to Darlaston in the borough of Walsall.

I would like to state that I have lived in the area for 17 years and that my property is approximately 2 miles away from the A463 Black Country Route.

Over the last few years my family and myself have had to put up with the issues attributed to the car cruising scene which blights the area in which we live.

Living near to the Black country route which connects the M6 motorway at junction 10 to the Black Country towns of Bilston, Wednesbury, Tipton, and West Bromwich can at sometimes be like living next to a motorsport track such as the like of Brands Hatch and Silverstone.

In the summer months you can't have your windows open due to the sound of high-powered vehicles using the route as an unauthorised racetrack into the early hours of the next day, the continually popping of the exhausts, the gear changes and the excessive engine revving keeps you awake which impacts on your life.

How anybody has not been seriously hurt or killed I do not know, it's not only the drivers and their passengers who are at risk but also persons who attend and stand around watching the meets.

X NOT SIGNED

Signature J WESTWOOD

Signature witnessed by .....

03/2016

OFFICIAL – (when complete)



OFFICIAL – (when complete)

MG11

Crime No.

URN

Statement of Julia ann westwood

I have been made aware that the local authorities of the area are attempting to put in place an order which would ban such activities, which I would strongly support.

By banning car cruising / racing on the local network of roads not only would it ease the blight of noise nuisance, but more importantly it would make the roads safer for other road user, who also must use the roads for work or social and domestic purposes. x

Signature <sup>x</sup> J WESTWOOD

Signature witnessed by

03/2016

OFFICIAL – (when complete)

**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 Roden

Age if under 18 Over 18 (if over 18 insert "over 18")

Occupation Project Manager

This statement (consisting of Two 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: X (witness)

Date 21/05/2022

Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am the above named person and I live at the address overleaf.

I have been asked to give a impact statement in regards to matters of Anti Socail Behavior, caused by car cruising, and incidents of illegal car races on the Black Country Route situated near to Darlaston / Moxley in the borough of Walsall.

I would like to state that I have lived in the area all my life and also that my property is situated approximately one and a half miles away from the A463 Black Country Route.

Over the last few years my family and myself have had to put up with the issues attributed to the car cruising scene which blights the area in which we live.

Living near to the Black country route which connects the M6 motorway at junction 10 to the Black Country towns of Bilston, Wednesbury, Tipton and West Bromwich has its problems, due to the fact people have took to using the arterial route as a racetrack.

In the summer months mostly at the weekends we have to keep our windows shut your due to the sound of high powered vehicles using the route as a unauthorised race track into the early hours of the next day, this impacts on your life and effects your sleep pattern due to the noise pollution.

The persons attending the events not only use the local road network as a race track, but they also attend trading esates and retail parks near by as a meeting place.

Signature X

Signature witnessed by

03/2016

OFFICIAL – (when complete)

**OFFICIAL – (when complete)**

MG11


Crime No.

URN

Statement of Lee Roden

I am aware that there was a road traffic collision back in 2018 where by a car crusier colideded with an innocent road user, How anyone has not been killed I don't know

I have been made aware that the local authorities of The west Midlands are attempting to put in place an order which would ban such activities, which I would strongly support.

By banning car cruising / racing on the local network of roads not only would it ease the blight of noise nuisance, but more importantly it would make the roads safer for other road user, who also have to use the roads for work or socail and domestic purposes. X 

Signature 

Signature witnessed by .....

03/2016

**OFFICIAL – (when complete)**

## 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 Robert Norton

Age if under 18 OVER 18 (if over 18 insert "over 18")

Occupation *undisclosed*

This statement (consisting of *one* 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: *[Signature]* (Witness)Date *22/05/22*Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am the above name person and I live at the address overleaf.

I have been asked to give a impact statement in regards to matters of Anti Socail Behavior, caused by car cruising, and incidents of illegal car races on the arterial routes situated near to Darlaston in the borough of Walsall.

Unfortunately over the last few years the main roads near to my home have become an unnoffical racetrack and the industrial and retail estates have become meeting up point for the persons involved.

Most weekends people attend the meets and from there they race their vehicles along the Black Country route. I Live near to Wessons Road which is a place where the cruising starts, the noise from the high powered engines and the exhausts causes me sleep depreavation, the racing can keep you up into the early hours and it appears that the police do not have the resources to deal with it.

I have been made aware that the local authorities of the area are attempting to put in place an order which would ban such activities, which I would strongly support.

By banning car cruising / racing on the local network of roads not only would it ease the blight of noise nuisance, but more importantly it would make the roads safer for other road user, who also have to use the roads for work or socail and domestic purposes.

Signature *[Signature]*Signature witnessed by *[Signature]* 26.1.22

03/2016

OFFICIAL – (when complete)

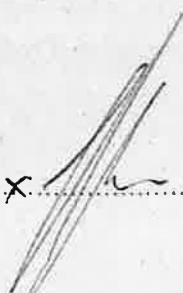
**OFFICIAL – (when complete)**

**MG11**

**Crime No.**

**URN**

Statement of Robert Norton

Signature 

Signature witnessed by .....

03/2016

**OFFICIAL – (when complete)**

## 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 Ravdeep Khara

Age if under 18 Over 18 (If over 18 insert "over 18")

Occupation payroll senior

This statement (consisting of ~~Two~~ 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: (witness)

Date 24/05/22

Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am the above name person and I live at the address overleaf.

I have been asked to give a impact statement in regards to matters of Anti Socail Behavior, caused by car cruising, and incidents of illegal car races on the arterial routes situated in the borough of Walsall.

Unfortunately over the last few years the main roads of Walsall have become an unnoffical racetrack, I am car user and on a daily basis have to negotiate the arterial routes in and around the town.

On the 28/08/20 I was driving on Springhill Road Walsall near to the town centre in the company of my mother, as I approached the six ways island prior to going onto the Birmingham Road I saw a small motor vehicle in the right hand lane next to me. The driver and the front passenger seat were young Asian males.

The vehicle that they were in was traveling at speed and in my assumption to quick to take the right turn at the island. I was worried that it would colide with my vehicle.

I continued to watch the vehicle as it made the manouvre and saw the driver complete a turn / skid on the island. I thought he was going to kill some one or cause damage to something.

I suspect that they may have been either drunk or high on drugs and was left shocked by the standard of their driving.

Signature

Signature witnessed by

03/2016

OFFICIAL – (when complete)

**OFFICIAL – (when complete)**

MG11

Crime No.

URN

Statement of Ravdeep Khara

I have been informed that a banning order in regards to car cruising / racing is being put in place which I support.

I believe that the main roads in the area will be safer for all with the banning order.



Signature .....

Signature witnessed by .....

03/2016

**OFFICIAL – (when complete)**



H. SECTION H - Bundle May 2021

IN THE HIGH COURT OF JUSTICE  
QUEEN'S BENCH DIVISION  
(BIRMINGHAM DISTRICT REGISTRY)

CLAIM NO: H90BM037

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

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BUNDLE OF EVIDENCE

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## A. SECTION A - Statement of Case

1.	Part 8 Claim Form	19-04-2021	A 1 - A 3
2.	N16A Application Form	19-04-2021	A 4 - A 6
3.	Particulars of Claim	19-04-2021	A 7 - A 19
4.	N244 Application - Order for Alternative Service of Application	19-04-2021	A 20 - A 24
5.	N244 Application - Order for Alternative Service of Injunction and Power of Arrest	19-04-2021	A 25 - A 29
6.	Draft New Injunction		A 30 - A 34
7.	Draft New Power of Arrest		A 35 - A 36
8.	ANNEX A - Map of the Black Country Areas		A 37

## B. SECTION B - Witness Statements on behalf of Wolverhampton City Council

1.	Joanne Mason (Head of Housing Operations) Witness Statement and Exhibits JM1-JM15	19-04-2021	B 1 - B 115
2.	Rachel Fanthom (Anti-social Behaviour Officer) Witness Statement	13-04-2021	B 116 - B 118
3.	Jennifer Bateman (Resident) Witness Statement	17-03-2021	B 119 - B 121
4.	1st Witness Statement of Paul Brown (Communications Manager)	19-04-2021	B 122 - B 124
5.	Exhibit PB1 - Communications Plan	19-04-2021	B 125 - B 127
6.	2nd Witness Statement of Paul Brown (Communications Manager)	05-05-2021	B 128 - B 135
7.	Exhibit PB2		B 136 - B 156
8.	Exhibit PB3		B 157 - B 185
9.	Exhibit PB4	22-04-2021	B 186 - B 188
10.	Exhibit PB5	22-04-2021	B 189
11.	Exhibit PB6	29-04-2021	B 190
12.	Exhibit PB7	29-04-2021	B 191
13.	Exhibit PB8	29-04-2021	B 192

## C. SECTION C - Witness Statements on Behalf of West Midlands Police

1.	Police Superintendent Ian Green Witness Statement	09-04-2021	C 1 - C 4
2.	PC Jon Edwards Statement No 2 and Exhibit JJE1	13-04-2021	C 5 - C 22
3.	PC Mark Campbell Witness Statement No 2	25-03-2021	C 23 - C 25

## D. SECTION D - Witness Statements on behalf of Dudley Metropolitan Borough Council

1.	Sue Haywood (Head of Community Safety) Witness Statement No 2 and Exhibits SH1-SH5	13-04-2021	D 1 - D 36
2.	Patricia Bradley (Resident) Witness Statement	11-04-2021	D 37 - D 40
3.	Faye Willetts (Resident) Witness Statement	12-04-2021	D 41 - D 45
4.	Written Evidence of Councillors Alan Taylor and David Vickers		D 46

## E. SECTION E - Witness Statements on behalf of Sandwell Metropolitan Borough Council

1.	Pardip Sandhu (Town Lead Anti-social Behaviour Officer) Witness Statement No 2 and Exhibits PS2-PS4	24-03-2021	E 1 - E 24
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2.	Pardip Sandhu (ASB Team Lead) Witness Statement No 3	09-04-2021	E 25 - E 27
3.	Exhibits PS5 and PS6		E 28 - E 47

## F. SECTION F - Witness Statements on behalf of Walsall Metropolitan Borough Council

1.	Steve Gittins (Team Leader, Community Protection) Witness Statement No 2	13-04-2021	F 1 - F 5
2.	Exhibit SJG1 Label		F 6
3.	Exhibit SJG1		F 7
4.	Exhibit SJG2 Label		F 8
5.	Exhibit SJG2		F 9
6.	Exhibit SJG3 Label		F 10
7.	Exhibit SJG3		F 11

## G. SECTION G - Relevant Witness Statements From Previous Application to Renew Injunction (Claim Numbers: A90BM228 and F90BM019)

1.	Police Sargeant Richard Phillips Witness Statement	04-11-2020	G 1 - G 3
2.	Sue Haywood (Head of Community Safety) Witness Statement No 1	16-10-2020	G 4 - G 9
3.	Pardip Sandhu (Town Lead Anti-social Behaviour Officer) Witness Statement No 1	14-10-2020	G 10 - G 12
4.	Steve Gittins (Team Leader, Community Protection) Witness Statement No 1	30-10-2020	G 13 - G 14
5.	PC Mark Campbell Witness Statement No 1	19-10-2020	G 15 - G 18
6.	Exhibit MCP1 Exhibit Label	03-11-2020	G 19
7.	Statement of Rajbinder Kaur (Resident) - Wolverhampton	03-11-2020	G 20 - G 21
8.	Statement of Lisa Fox (Resident) - Wolverhampton	28-10-2020	G 22 - G 23
9.	Statement of David England (Business Owner) - Sandwell	03-11-2020	G 24 - G 25
10.	Statements of Hema Hayer (Sandwell Resident) and Jeffry Diffe (Walsall Resident)	20-10-2020	G 26 - G 31
11.	Witness Statement of Richard Hardy (Walsall Business Owner)	16-10-2020	G 32 - G 33
12.	PC Jon Edwards Statement No 1	19-10-2020	G 34 - G 37

## H. SECTION H - Court Orders

1.	Original Injunction and Power of Arrest	01-12-2014	H 1 - H 7
2.	Renewed Injunction Order	09-01-2018	H 8 - H 12
3.	Renewed Power of Arrest	09-01-2018	H 13 - H 14

## A. SECTION A - Statement of Case

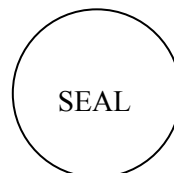


## Claim Form (CPR Part 8)

In the	High Court of Justice, Queen's Bench Division, Birmingham District Registry
Claim no.	
Fee Account no.	PBA0082797
Help with Fees – Ref no. (if applicable)	H W F - <input type="text"/> <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/>

### Claimants

- (1) Wolverhampton City Council, Civic Centre, St. Peter's Square, Wolverhampton, WV1 1RG
- (2) Dudley Metropolitan Borough Council, Council House, Priory Road, Dudley, DY1 1HF
- (3) Sandwell Metropolitan Borough Council, Sandwell Council House, Oldbury, B69 3DE
- (4) Walsall Metropolitan Borough Council, Civic Centre, Walsall, WS1 1TP



### Defendants

- (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)

(Addresses not applicable)

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

### Details of claim (see also overleaf)

The Claimants seek the following relief:

- (i) An Injunction order;
- (ii) A power of arrest;
- (iii) Declaratory relief; and
- (iv) Further or other relief as the Court thinks fit

Defendant's name and address

Persons Unknown as defined above  
(Addresses not applicable)

	£
Court fee	
Legal representative's costs	T.B.A
Issue date	

For further details of the courts <http://www.gov.uk/find-court-tribunal>.

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.	
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Details of claim (*continued*)

To restrain:

- (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)

The Claim is brought pursuant to the following statutory provisions:

- (i) Sections 111 and 222 Local Government Act 1972
- (ii) Section 130 Highways Act 1980
- (iii) Section 37 Senior Courts Act 1981
- (iv) Section 1 Localism Act 2021
- (v) Sections 6 and 17 Crime and Disorder Act 1998
- (vi) Section 27 Police and Justice Act 2006

Full details of the legal and factual basis for the claim are set out in the attached Particulars of Claim and witness statements filed herewith.

Part 8 Civil Procedure Rules applies to this claim.

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 the draft Order.

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 the draft Order.

Wolverhampton City Council  
Legal Services, St Peter's Square, Wolverhampton, WV1 1RG  
[chris.simmonds@wolverhampton.gov.uk](mailto:chris.simmonds@wolverhampton.gov.uk) /  
[adam.sheen@wolverhampton.gov.uk](mailto:adam.sheen@wolverhampton.gov.uk)  
DX: 744350 Wolverhampton 27

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

The Claimant understands 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

Month

Year

19

April

2021

Full name

David Pattison

Name of claimant's legal representative's firm

Legal Services, Wolverhampton City Council

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

Director of Governance & Solicitor to the Council

# Application for Injunction (General Form)

Name of court  High Court of Justice, Queen's Bench Division, Birmingham District Registry	Claim No.
Claimant's Name and Ref. Wolverhampton City Council, LIJ017753P	
Defendant's Name and 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)	
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.

- ☐ By application in pending proceedings
- ☒ Under Statutory provision s222 Local Government Act 1972 and s130 Highways Act 1980
- ☒ This application is made under Part 8 of the Civil Procedure Rules

Seal

This application raises issues under the Human Rights Act 1998

☐

Yes

☒

No

The Claimants:

- (1) Wolverhampton City Council, Civic Centre, St. Peter's Square, Wolverhampton, WV1 1RG
- (2) Dudley Metropolitan Borough Council, Council House, Priory Road, Dudley, DY1 1HF
- (3) Sandwell Metropolitan Borough Council, Sandwell Council House, Oldbury, B69 3DE
- (4) Walsall Metropolitan Borough Council, Civic Centre, Walsall, WS1 1TP

The court office at

is open between 10am and 4pm Mon - Fri. When corresponding with the court, please address all forms and letters to the Court Manager and quote the claim number.

**N16A** General form of application for injunction (05.14)

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1. The Claimants seeks the following relief:
  - (ii) An Injunction order;
  - (iii) A power of arrest;
  - (iv) Declaratory relief; and
  - (v) Further or other relief as the Court thinks fit

2. To restrain:

(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

- (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)

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

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

3. Full details of the legal and factual basis for the claim are set out in the attached Particulars of Claim and witness statements filed herewith.

**The grounds of this application are** set out in the written evidence of Joanne Mason, Rachel Fanthom, Paul Brown, Police Superintendent Ian Green, PC Jon Edwards, PC Mark Campbell, Sue Haywood, Patricia Bradley, Faye Willetts, Councillor Alan Taylor, Councillor David Vickers, Pardip Sandhu, Steven Gittins, Police Sergeant Richard Phillips, Rajbinder Kaur, Lisa Fox, David England, Hema Hayer and Richard Hardy.

This written evidence is served with this application.

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 the draft Order.

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 the draft Order.

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

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



Signed:

Dated: 19.04.2021

A 5  
H 9

\*  
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

Claim No.

IN THE HIGH COURT OF JUSTICE  
QUEEN'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  
QUEEN'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

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## 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 area 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.

### *Justification for an Injunction*

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

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

27 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 motor-sports events and exhibitions.

### *Power of Arrest*

28 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..."

29 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*

30 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 the 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*

31 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 the draft.

32 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 19th day of April 2021

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: Director of Governance & Solicitor to the Council

A handwritten signature in cursive script, appearing to read 'David Pattison', written in dark ink.

SIGNED:

N244

## 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>

<b>Name of court</b> High Court of Justice, Queen's Bench Division, Birmingham District Registry		<b>Claim no.</b>	
<b>Fee account no.</b> (if applicable)		<b>Help with Fees - Ref. no.</b> (if applicable)	
PBA0082797		<div style="display: flex; align-items: center;"> <div style="border: 1px solid black; padding: 2px 5px; margin-right: 5px;">H</div> <div style="border: 1px solid black; padding: 2px 5px; margin-right: 5px;">W</div> <div style="border: 1px solid black; padding: 2px 5px; margin-right: 5px;">F</div> <div style="margin: 0 5px;">-</div> <div style="border: 1px solid black; width: 20px; height: 20px; display: flex; align-items: center; justify-content: center;"> </div> <div style="margin: 0 5px;">-</div> <div style="border: 1px solid black; width: 20px; height: 20px; display: flex; align-items: center; justify-content: center;"> </div> </div>	
<b>Warrant no.</b> (if applicable)			
<b>Claimant's name</b> (including ref.) (1) Wolverhampton City Council, (2) Dudley Metropolitan Borough Council, (3) Sandwell Metropolitan Borough Council and (4) Walsall Metropolitan Borough Council (Ref: CS/ LIJ017753P)			
<b>Defendant's name</b> (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)			
<b>Date</b>		19/04/2021	

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

Legal Services, 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 r.6.15 and 27, the Claimants ask the Court to make an order that it be permitted to serve its Part 8 Claim Form, N16A Claim Form, Particulars of Claim, Application for an Injunction and Power of Arrest (and substituted service thereof), application for alternative service and supporting witness statements by the alternative service methods specified in the draft order.

A 20

H 24

4. Have you attached a draft of the order you are applying for?

☒ Yes (inc. in Draft Injunction Order)  
☐ No

5. How do you want to have this application dealt with?

☒ at a hearing ☐ without a hearing

☐ at a telephone hearing

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

Hours  Minutes

☐ Yes ☒ No

7. Give details of any fixed trial date or period

13 May 2021

8. What level of Judge does your hearing need?

High Court Judge, or s.9 if practicable

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.

1. The Claimants seek an order pursuant to CPR r 6.15 and 27 that it be permitted to serve its Part 8 Claim Form, N16A Claim Form, Particulars of Claim, Application for an Injunction and Power of Arrest (and substituted service thereof), application for alternative service and supporting witness statements by the alternative service methods specified in the draft order.
2. The Court is referred to the witness statement of Paul Brown, Communications Manager, dated 19 April 2021 which sets out the steps which the Claimants propose to take in order to effect substituted service on Persons Unknown.
3. The Claimants believe that the documents are likely to reach Persons Unknown by the methods proposed in the witness statement of Paul Brown, which includes:
  - a) Publication of notice of the hearing of 13 May on the four Claimants websites and the website of West Midlands Police;
  - b) Issuing of media release to print and broadcast media giving notice of the hearing of 13 May and inviting people to submit comments to be presented as evidence to the court. Providing interviews for broadcast media as required;
  - c) Publication on social media giving notice of the hearing of 13 May and inviting people to submit comments to be submitted as evidence to the court;
  - d) Publication of public notice in the Express & Star newspaper (all editions covering the Black Country area) giving notice of the hearing of 13 May and inviting people to submit comments to be submitted as evidence to the court;
  - e) Issuing of media release to print and broadcast media reminding people of the deadline before which to submit comments to be presented as evidence to the court. Providing interviews for broadcast media as required;
  - f) Publication on social media reminding people of the deadline before which to submit comments to be presented as evidence to the court;
  - g) Issuing of media release to print and broadcast media giving notice of the hearing on 13 May. Providing interviews for broadcast media as required;
  - h) Issuing of media release to print and broadcast media on outcome of hearing and next steps including date of implementation of injunction if approved.
4. The Claimants therefore invite the court to grant an order in the terms of the draft order attached hereto, or in such terms as the court thinks fit.

# 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 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

19

Month

04

Year

2021

## Full name

David Pattison

## Name of applicant's legal representative's firm

Legal Services, Wolverhampton City Council

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

Director of Governance & 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)

West Midlands

Postcode

W V 1 1 R G

If applicable

Phone number

01902 555317

Fax number

DX number

DX: 744350 Wolverhampton 27

Your Ref.

CS/ LIJ017753P

Email

chris.simmonds@wolverhampton.gov.uk

N244

## 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>

<b>Name of court</b> High Court of Justice, Queen's Bench Division, Birmingham District Registry		<b>Claim no.</b>	
<b>Fee account no.</b> (if applicable)		<b>Help with Fees - Ref. no.</b> (if applicable)	
PBA0082797		<div style="display: flex; align-items: center;"> <div style="border: 1px solid black; padding: 2px 5px; margin-right: 5px;">H</div> <div style="border: 1px solid black; padding: 2px 5px; margin-right: 5px;">W</div> <div style="border: 1px solid black; padding: 2px 5px; margin-right: 5px;">F</div> <div style="margin: 0 5px;">-</div> <div style="border: 1px solid black; width: 20px; height: 20px; display: flex; align-items: center; justify-content: center;"> </div> <div style="margin: 0 5px;">-</div> <div style="border: 1px solid black; width: 20px; height: 20px; display: flex; align-items: center; justify-content: center;"> </div> </div>	
<b>Warrant no.</b> (if applicable)			
<b>Claimant's name</b> (including ref.) (1) Wolverhampton City Council, (2) Dudley Metropolitan Borough Council, (3) Sandwell Metropolitan Borough Council and (4) Walsall Metropolitan Borough Council (Ref: CS/ LIJ017753P)			
<b>Defendant's name</b> (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)			
<b>Date</b>		19/04/2021	

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

Legal Services, 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 r.81.4(d), the Claimants asks the Court to make an order that it be permitted to serve any injunction and power of arrest granted by the alternative means specified in the draft injunction

4. Have you attached a draft of the order you are applying for?

☒ Yes (inc. in Draft Injunction Order)  
☐ No

5. How do you want to have this application dealt with?

☒ at a hearing ☐ without a hearing

☐ at a telephone hearing

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

Hours  Minutes

☐ Yes ☒ No

7. Give details of any fixed trial date or period

13 May 2021

8. What level of Judge does your hearing need?

High Court Judge, or s.9 if practicable

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.

1. The Claimants seek an order pursuant to CPR r 81.4(d) that it be permitted to serve any injunction and power of arrest granted by the court by the alternative service methods specified in the draft order.
2. The Court is referred to the witness statement of Paul Brown, Communications Manager, dated 19 April 2021 which sets out the steps which the Claimants propose to take in order to effect substituted service on Persons Unknown.
3. The Claimants believe that any injunction and power of arrest are likely to reach Persons Unknown by the methods proposed in the witness statement of Paul Brown, which includes:
  - a) Publication of information relating to the car cruising injunction on the four Claimants' websites, and the website of West Midlands Police. This would include the publication of copies of the injunction and power of arrest;
  - b) Making copies of the injunction and power of arrest available at the front desks of the Claimants' main offices, including police stations throughout the Black Country.
  - c) Review of existing signage: 25x metal signs and 100x foam signs bearing the legend "Warning, No car cruising in Black Country area HIGH COURT INJUNCTION IN FORCE", together with the logos of the four councils and West Midlands Police. These are displayed at car cruising hotspots as identified by partners around the Black Country.
  - d) Suite of media releases to be prepared and disseminated to print and broadcast media outlets throughout the life of the injunction.
  - e) Suite of social media messages to be prepared and disseminated using partners' social media channels (Facebook, Twitter, Instagram and Snapchat) containing details of the injunction, terms and the power of arrest, and highlighting ongoing enforcement action;
  - f) Facebook advertising campaign, targeted at demographic of those most likely to participate in car cruising, containing details of the injunction, terms and the power of arrest;
  - g) Full-page advertorial to be carried in all editions of the Express & Star containing details of the injunction, terms and the power of arrest.
  - h) Advertising takeover of Express & Star website on day injunction comes into force to containing details of the injunction, terms and the power of arrest
  - i) Use of electronic traffic signage in Black Country to promote the car cruising injunction, using legends such as "CAR CRUISERS WILL BE PROSECUTED", "CAR CRUISING BANNED IN BLACK COUNTRY", "CAR CRUISING: SPECTATING IS PARTICIPATING" etc, throughout the period in question. These will be scheduled to appear at key times including weekends and evenings, and in areas of particular car cruising activity.
  - j) Uploading to the video sharing website YouTube, a video of someone presenting and reciting a copy of the terms of the injunction with a warning that should people be tempted to 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.
  - k) Receive reports and review that actions detailed above have been completed satisfactorily.
4. The Claimants therefore invite the court to grant an order in the terms of the draft order attached hereto, or in such terms as the court thinks fit.

## 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 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

19

Month

04

Year

2021

### Full name

David Pattison

### Name of applicant's legal representative's firm

Legal Services, Wolverhampton City Council

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

Director of Governance & 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)

West Midlands

Postcode

W	V	1	1	R	G	
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If applicable

Phone number

01902 555317

Fax number

--

DX number

DX: 744350 Wolverhampton 27

Your Ref.

CS/ LIJ017753P

Email

chris.simmonds@wolverhampton.gov.uk

<b>IN JUNCTION</b>  <b>Between:</b> (1) <b>Wolverhampton City Council</b> (2) <b>Dudley Metropolitan Borough Council</b> (3) <b>Sandwell Metropolitan Borough Council</b> (4) <b>Walsall Metropolitan Borough Council</b> <p style="text-align: right;"><b>Claimants</b></p> <p style="text-align: center;"><b>-and-</b></p> (1) <b>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</b> (2) <b>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</b> (3) <b>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)</b>  <p style="text-align: right;"><b>Defendants</b></p>		<b>IN THE HIGH COURT OF JUSTICE</b> <b>QUEEN'S BENCH DIVISION</b> <b>BIRMINGHAM DISTRICT REGISTRY</b>	
<b>To:</b>	(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	<b>Claim No:</b>	
		<b>Claimants:</b>	<b>Wolverhampton City Council &amp; Others</b>
		<b>Defendants:</b>	(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



	driving within the Black Country Area shown on Plan A (attached)		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)
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### **PENAL NOTICE**

### **IF 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**

*If you do not understand anything in this order, you should go to a Solicitor, Legal Advice Centre or a Citizens Advice Bureau.*

Any party can apply to the court for this order to be varied or discharged. But you must obey the order unless it is varied or discharged by the Court.

Before Her Honour Judge Kelly sitting as a Judge of the High Court, at the High Court of Justice, Birmingham District Registry, Priory Courts, 33 Bull Street, Birmingham, B4 6DS on 13 May 2021

**UPON** hearing Counsel for the Claimants and upon considering an application for an injunction pursuant to section 222 Local Government Act 1972 and the Court exercising its discretion to grant injunctive relief pursuant to section 37(1) Senior Courts Act 1981

### **IT IS ORDERED THAT:**

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)
4. 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
5. A Power of Arrest pursuant to section 27 Police and Criminal Justice Act 2006 shall apply to clauses 1 & 2 of this Order.
6. This Order & Power of Arrest shall come into effect at midnight on 11.59 pm on 27 May 2021, provided that the Claimants, by their proper officer have given to the court written notice that the steps identified at paragraph 7 below have been completed. [Such notice shall be by a witness statement from the Claimants’ proper officer (solicitor or administrative staff official)].
7. This Order & Power of Arrest shall, expire at 11.59 pm on 27 May 2024 unless it is extended, varied or discharged by further the court.
8. Service of the Claim Form, Particulars of Claim and Application Notice has been effected pursuant to CPR 6.15 & 6.27 as the Claimants have:
  - (a) placed a copy of the Claim Form, Particulars of Claim and Application Notice and all associated paperwork on the Claimants' websites;

- (b) made available hard copy of the Claim Form, Particulars of Claim and Application Notice and all associated paperwork at the front desks of the Claimants' main offices, and police stations throughout the Black Country; and
  - (c) advertised that these proceedings have been issued in the Dudley, Halesowen, Stourbridge, Sandwell, Walsall and Wolverhampton editions of the Express & Star newspaper (setting out where the Application Notice and associated paperwork can be obtained.)
9. Personal service of this Injunction & Power of Arrest is dispensed with pursuant to rule 81.4(2)(d) of the Civil Procedure Rules.
10. Service of this injunction and accompanying power of arrest shall be effected namely upon 27 May 2021, from which date this injunction and power of arrest shall become effective, following the Claimants' conclusion of the following steps and written notice thereof having been given to the court in accordance with paragraph 5 above:
- (a) Facebook advertising campaign targeted at users who best fit the car cruising demographic.
  - (b) Placing a copy of the Injunction and Power of Arrest in the Dudley, Halesowen, Stourbridge, Sandwell, Walsall and Wolverhampton editions of the Express & Star newspaper (to be published simultaneously after the grant of the injunction.)
  - (c) Publishing a copy of the Injunction and Power of Arrest on each of the Claimants' websites and official social media pages (Twitter and Facebook) and likewise on the website and social media pages of West Midlands Police.
  - (d) 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 tempted to 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 .
  - (e) Maintaining and (re-erecting if required) 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 "Warning No car cruising in Black Country area HIGH COURT INJUNCTION in force"

- (f) 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.

11. A review hearing will take place in open court (elh 30 minutes) before a Judge of the High Court (section 9 if practicable) after this extended order has been in force for a further 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 order, including for example, breaches, warnings or problems, if any arising out the extended order (including the Power of Arrest).

**Ordered by:**

**On: 13 May 2021**

**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**

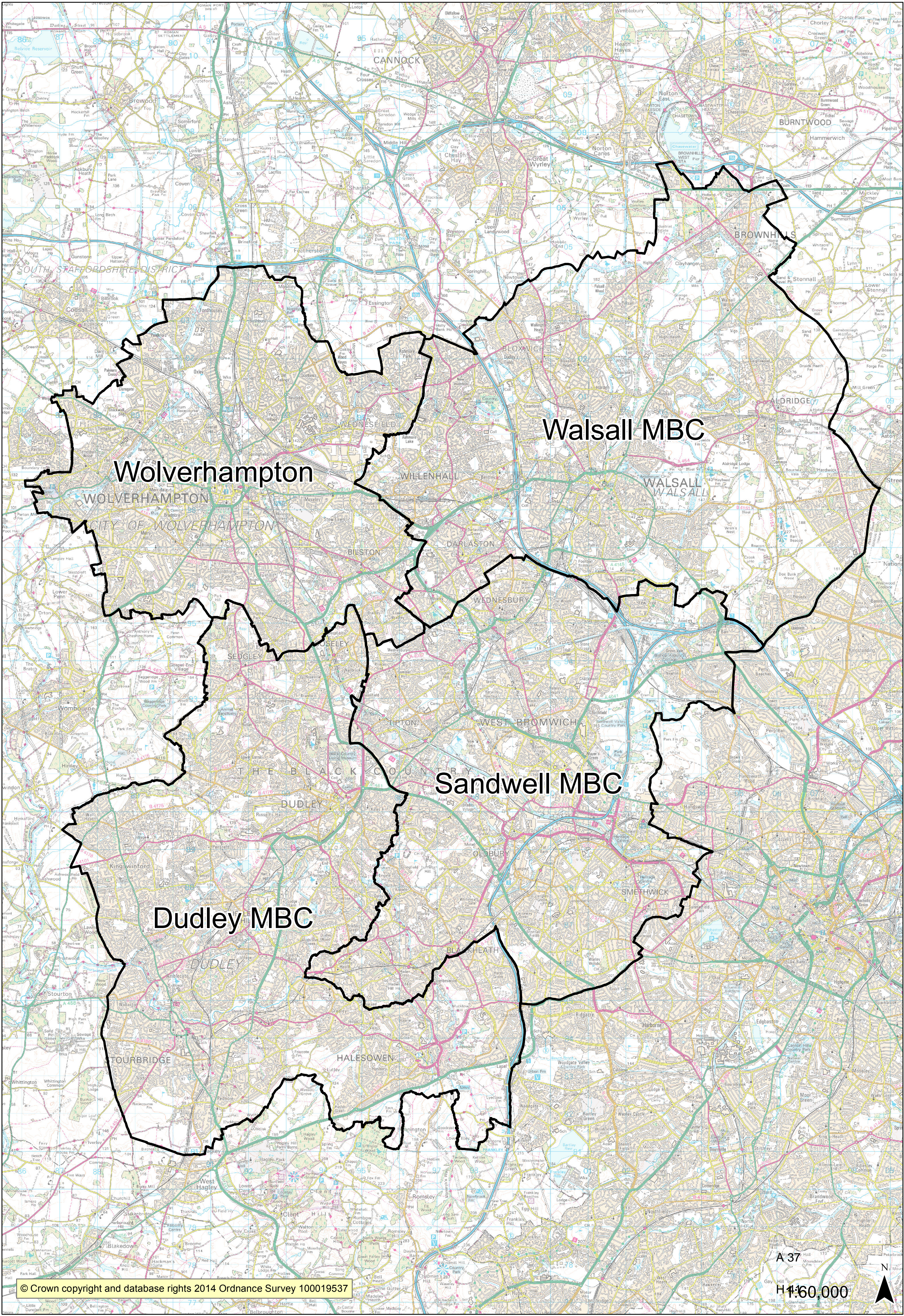
**IN THE HIGH COURT OF JUSTICE, QUEEN'S BENCH DIVISION, BIRMINGHAM  
DISTRICT REGISTRY**

<ul style="list-style-type: none"> <li>(1) <b>Wolverhampton City Council</b></li> <li>(2) <b>Dudley Metropolitan Borough Council</b></li> <li>(3) <b>Sandwell Metropolitan Borough Council</b></li> <li>(4) <b>Walsall Metropolitan Borough Council</b></li> </ul>	Claimants
<ul style="list-style-type: none"> <li>(1) <b>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</b></li> <li>(2) <b>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</b></li> <li>(3) <b>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)</b></li> </ul>	Defendants

<p>(Here set out those provisions of the order to which this power of arrest is attached and no others)</p> <p>(Where marked * delete as appropriate)</p> <p><b>POWER OF ARREST</b></p>	<p><b>The court orders that a power of arrest under section 27 Police and Criminal Justice Act 2006 applies to the following paragraphs of an order made on 13 May 2021:</b></p> <ol style="list-style-type: none"> <li>1. <b>IT IS FORBIDDEN</b> 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.</li> <li>2. <b>IT IS ALSO FORBIDDEN</b> 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</li> </ol> <hr/> <p>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.</p>
---	---

	<p>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.</p> <hr/>
This power expires at 11:59 p.m. on	<p><b>27 May 2024.</b></p> <hr/>
Note to arresting officer	<p>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:</p> <ul style="list-style-type: none"><li>• A constable shall after making such an arrest forthwith inform the person on whose application the injunction was granted;</li><li>• Such person shall be brought before the relevant judge within 24 hours beginning at the time of his arrest;</li><li>• And if the matter is not then disposed of forthwith, the Judge may remand such person.</li><li>• 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.</li><li>• In reckoning any period of 24 hours for these purposes, no account shall be taken of Christmas Day, Good Friday or any Sunday.</li></ul> <hr/>
Ordered by	
on	<p><b>13 May 2021</b></p>







**B. SECTION B - Witness Statements on behalf of Wolverhampton City Council**

i) Statement of: J Mason  
ii) Statement No: 1  
iii) For: Claimants  
iv) Dated: 19.04.2021  
v) Exhibits: JM1-JM16

**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 JOANNE MASON**

---

I, Joanne Mason, on behalf of Wolverhampton City Council, WILL SAY AS FOLLOWS:

1. I am Joanne Mason and I am employed as Head of Housing Operations at Wolverhampton Homes. I have held this post since November 2020. Prior to that I was manager of Wolverhampton Anti-social Behaviour team; I held this post from May 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 was involved with the preparation 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.

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.

My personal knowledge of the issue dates from evidence gathered from January 2013 to the present date.

6. From the evidence I gathered for the 2015 injunction application, I gleaned 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, I 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 JM1**.
- Another witness, Jennifer Bateman, who lives in the Sedgemoor Park area told me 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.

### **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 JM2**.
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 JM3**.
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 JM5**.

## **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 JM4**.
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 JM2**.
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 JM5**.



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 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 JM6**.
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 JM2**.
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 JM7**.
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 JM8**.

**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 urinating in the porches of buildings, damage to buildings and fences, oil spillages and 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 JM9**.
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 JM4**.
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 JM10**.

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

32. Since the previous injunction came into force in February 2015, whilst evidence gathering for annual review hearings, I have monitored reaction to the injunction. When speaking to many members of the public they told me 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, I 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. I also requested updates from the local authority lead officers as well as West Midlands Police. A summary is detailed below.

**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 at page G22 in the bundle of documents available to the court filed in support of this application

37. Similarly, in her witness statement resident Rajbinder Kaur (page G20), 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 at page G20 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. I have recently become 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 JM11** 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.
40. 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, having dealt with car cruising for the past eight years, in my professional opinion the gathering of parked vehicles adjacent 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'.

## **Walsall**

41. In late 2020, in his witness statement 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 at page G30 in the bundle of documents available to the court filed in support of this application.
42. In his witness statement 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 at page G32 in the bundle of documents available to the court filed in support of this application.

43. In his witness statement provided in late 2020, 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 remain significantly reduced since the injunction came into effect. Mr Gittins stated that although the number and frequency of incidents had reduced, there were still areas of concern, particularly on and around the Black Country Route which runs between the Moxley, Darlaston and Willenhall areas. Nevertheless, Mr Gittins contended that overall the injunction continued to have a positive deterrent effect on addressing the problems associated with car cruising in Walsall. I understand the statement of Steven Gittins will be included at page G13 in the bundle of documents available to the court filed in support of this application.

### **Sandwell**

44. In regard to Sandwell, in late 2020, a witness statement provided by David England, who is a representative of business, highlighted that since 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 at page G24 in the bundle of documents available to the court filed in support of this application.
45. 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 at page G26 in the bundle of documents available to the court filed in support of this application.
46. In his first witness statement of 14 October 2020, Pardip Sandhu, who is an anti-social behaviour officer at Sandwell Metropolitan Borough Council, stated that he believed the injunction was having a positive impact on residents, local businesses, partner agencies and the police as he stated that there had been a marked reduction in car cruising across the borough.

47. However, Mr Sandhu went on to state that the problem had not gone away altogether as there had still been incidents when the council had taken further action against perpetrators, including sending tenancy warning letters to local residents.
48. 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 at page G10 in the bundle of documents available to the court filed in support of this application.

## **Dudley**

49. In Dudley, in her witness statement provided in late 2020, Sue Haywood, who is the Head of Community Safety at Dudley Metropolitan Borough Council, stated that whilst car cruising activities appeared to have reduced the problem of car cruising, it had not gone away altogether and had spread to new areas within the borough.
50. Ms Haywood stated that there were seven areas within Dudley where car cruising continued to take place. These were: Flood Street car park, Tesco car park - Burnt Tree Island, Dudley car park, Stourbridge Ring Road, Priory Road in Dudley, the Showcase Cinema car park - Castlegate and Morrisons car park, Kingswinford. I understand the statement of Sue Haywood will be included at page G4 in the bundle of documents available to the court filed in support of this application.
51. In his witness statement provided in late 2020, PC Jonathan Edwards confirms the issues at the locations in Dudley identified by Ms Haywood in paragraph 50 above. I understand the statement of PC Edwards will be included at page C5 in the bundle of documents available to the court filed in support of this application.
52. The statements of both Ms Haywood and PC Edwards both refer to fatalities in the Dudley borough. Ms Haywood stated that since April 2016, three young people had died in road traffic accidents in Dudley and that she believes that activities prohibited by car cruising may have been a factor in at least one of these fatalities.
53. One fatality in Dudley relates to 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 Sue Hayward in paragraph 50 above, Tesco Extra in Dudley is a known 'hotspot' location for car cruise 'meets'. I now reference **Exhibit JM12** 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.

54. 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 at page D41 in the bundle of documents available to the court filed in support of this matter.
55. In her statement Sue Haywood refers to the fact that, in conjunction with West Midlands Fire Service and West Midlands Police, Dudley Metropolitan Borough Council had started to run driver safety courses in Dudley for individuals they consider may have breached the injunction. The authorities assess the seriousness of the allegation and whether the individual would be a suitable candidate to attend a driver safety course.
56. On Monday 19 October 2020, I attended a meeting of representatives of the four Black Country local authorities as well as a solicitor from Birmingham City Council to discuss the Black Country and the Birmingham car cruising injunctions. At the meeting, Julian Boyle who is a solicitor from Dudley Metropolitan Borough Council, updated the group on the driver safety courses referenced in paragraph 55 above. It was agreed by representatives from Sandwell, Walsall and Wolverhampton

Councils that they would review the impact of the driver safety course being run in Dudley in 12 months' time and then, dependent on the evidence of its effectiveness in reducing car cruising in Dudley, consider adopting this model across the other Black Country boroughs.

**'Policing' of the previous injunction (February 2015 to February 2021)**

57. As far as 'policing' the injunction is concerned, as outlined in the statement of Sergeant Richard Phillips of West Midlands Police, since the previous injunction commenced in February 2015, West Midlands Police have carried out a number of regional car cruise operations supporting the three injunctions that existed across the Force area.
58. In his statement, Sergeant Phillips details the number of calls for service across the four Black Country areas. He goes on to state that since the previous injunction went 'live' in 2015, there were seven deaths across the Black Country linked to car cruising activity involving both motorbikes and vehicles racing.
59. Sergeant Phillips goes on to state that while there had been a decrease in car cruising since the previous injunction came into force in 2015, the data confirms that it had not ceased altogether. Concerningly, Sergeant Phillips highlights a rise in reports of car cruising across the region during the period of Covid-19 'lockdown'. Sergeant Phillips attributes this increase to there being less traffic on the roads which has presented more opportunities for street racing to take place. The increase in reports of car cruising during Covid-19 restrictions highlighted by Sergeant Phillips tallies with the observations of Lisa Fox (referred to in paragraph 36 above), Rajbinder Kaur (referred to in paragraph 37 above) and Faye Willetts (referred to in paragraph 54 above) who, in their witness statements, all refer to a rise in car cruising during this period.
60. Sergeant Phillips states that he continues to lead on the Black Country response to car cruising. He goes on to highlight West Midlands Police's usage of new technology in the form of drones which, he states, have proven effective in providing a cost-effective means of deterrence and of gathering high quality video evidence of breaches of the previous injunction. Sergeant Phillips firmly believes that the previous injunction was a success. I understand Sergeant Phillips' statement will be

included at page G1 in the bundle of documents available to the court filed in support of this matter.

61. In his witness statement, Chief Superintendent Ian Green, who is the West Midlands Police Force strategic lead for anti-social behaviour and illegal street racing and car cruising, highlights that this has been a significant Force issue for the past few years. He states that street racing is generating one of the largest anti-social issues across the West Midlands and wider. I understand the statement of Chief Superintendent Ian Green will be included at page C1 in the bundle of documents available to the court filed in support of this application.
62. Chief Superintendent Green goes on to state that West Midlands Police have been seeking to tackle the issue of street racing for the past two years through targeting drivers, passengers and crowds through numerous high-profile policing operations. He highlights that where there have been breaches of the injunctions across Birmingham, Solihull and Wolverhampton, the police have adopted a proportionate, escalating response, ranging from warning letters, contact with insurance companies through to summons and arrests. This approach had seen a 30 percent reduction in street racing prior to the Covid-19 pandemic.
63. Chief Superintendent Green states that he has been leading on the West Midlands Police response to policing the Covid-19 pandemic. He states that illegal street racing and gatherings have been a considerable threat to the UK's fight against Covid-19.
64. Chief Superintendent Green highlights that since Covid-19 'lockdowns', the police have seen a commitment by the racers and crowds to gather and continue to race and they have even encouraged this during the pandemic claiming the roads would be quieter, clearly showing that they understand the risk to other road users from their behaviour. This again tallies with the evidence provided in the witness statements of Sergeant Richard Phillips and the residents Lisa Fox, Jennifer Bateman and Faye Willetts – as highlighted in paragraph 59 above.
65. 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.

66. Through attending regional meetings in regard to car cruising, it has come to my attention that spectating in the Black Country area has become a particular cause for concern to West Midlands Police.
67. In his first witness statement, PC Mark Campbell, who is the single point of contact in regard to car cruising/street racing issues within the West Midlands Force area, states that in the last twelve months police have seen an increasing number of locations where large numbers of people are attending to spectate car cruising/street throughout the Black Country area. PC Campbell goes on to state that on a number of occasions police officers have witnessed between 100 to 150 plus spectators lining the roads and roundabouts on Duncan Edwards Way - Dudley, Kenrick Way - Sandwell and the Black Country Route.
68. PC Campbell states that the sheer volume 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.
69. To accompany his witness statement, PC Campbell exhibits video footage and still images capturing spectators attending locations in the Black Country. The video footage not only highlights the potential dangers caused by the spectators, but also how their actions can lead to increased risks being taken by the drivers of the racing cars. PC Campbell goes on to state that the spectators themselves record the car cruising and post it onto social media, thus glorifying street racing.
70. PC Campbell also exhibits video footage of a collision involving spectators in the Birmingham area where it shows one of the spectators was hit by a vehicle and sustained injuries. As PC Campbell states, it was sheer luck that the spectators were able to move out of the way in time and that the collision did not result in a fatality. Whilst I appreciate that this incident was outside of the Black Country area, the purpose of PC Campbell including this evidence is to demonstrate what can happen

when spectators are present at car cruising meets/gatherings. I understand the first statement of PC Mark Campbell will be included at page G15 in the bundle of documents available to the court filed in support of this application.

71. I would also draw the attention of the court to an incident reported in the national media in 2019 where in Stevenage, Kent, nineteen bystanders were injured when a car ploughed into the crowd at a car cruising 'meet' whilst doing a 'donut' manoeuvre. I now refer to **Exhibit JM13** which is screenshot taken from The Hertfordshire Mercury which reported on the Stevenage incident at the time. This incident further demonstrates what can happen at so-called car cruise 'meets' where large crowds of spectators are in attendance.
72. Concern about spectators is also raised by Chief Superintendent Ian Green in his statement, where he references the inherent dangers of this activity, as borne out by the serious incident in Stevenage (as highlighted in paragraph 71 above).
73. 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 the court to include a prohibition relating to spectators.

#### **Feedback from members of the public**

74. As part of the application to renew the previous car cruising injunction, publicity about the hearing taking place in January 2021 was issued through various media channels. On 21 January 2021, 30 responses had been received. Twenty-seven members of the public and one Member of Parliament (MP) responded to say they were in support of the renewal of the injunction, there was one mixed response and there were two negative responses. **Exhibit JM14** details the comments received from members of the public and the MP.

#### **The current situation in the Black Country since the lapse of the previous injunction**

75. 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.
76. In his second witness statement, PC Mark Campbell details the impact as a result of the lapse of the previous injunction banning car cruising in the Black Country. PC Campbell states that West Midlands Police have seen a large increase in street racing/anti-social use of vehicles reported to the police.
77. In his statement, PC Campbell notes the social media comments that followed media reports of the previous injunction ending on 1 February 2021. These include the following:
- “The Black Country is going to get smashed now.”
  - “Free to race, the police can’t do shit now.”
78. 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. This data seems to suggest that the ‘threats’ posted on social media from would-be car cruisers detailed in paragraph 77 above have come to fruition.
79. PC Campbell notes that the main areas of concern currently are Dudley and Sandwell. As detailed in PC Campbell’s statement, in February 2021 (following the lapse of the previous injunction on 1 February 2021), in Dudley the calls to police reporting car cruising have more than doubled when compared to calls received in January 2021. In Sandwell, the calls in February 2021 tripled when compared to the calls received in January 2021. I understand the second statement of PC Mark Campbell will be included at page C23 in the bundle of documents available to the court filed in support of this application.
80. In his statement (page C1), Chief Superintendent Green states that since the lapse of the Black Country injunction on 1 February 2021, West Midlands Police have seen a marked increase in both the numbers gathering and racing and the frequency across the whole of the Black Country, Birmingham and Solihull. It is thought that

some 'car cruisers' believe that all three injunctions have ended, when in fact it is only the Black Country injunction that has lapsed.

81. Chief Superintendent Green reports that there are huge numbers of members of the public who are reaching the end of their tether and are emailing the police, complaining about the health and mental impact of the noise and danger caused by those intent on racing illegally and dangerously. In his statement, Chief Superintendent Green provides a quote from one resident detailing the impact on the mental health of the whole family due to sleep deprivation from the noise of the vehicles racing. The resident states: "... we now fear that it has the potential to lead to serious consequences for some vulnerable people".
82. Chief Superintendent Green goes on to state that West Midlands Police have seen an increase in accidents associated with illegal street racing and that it is "sheer luck" there has not been a fatality from either the group or an innocent member of the public caught up in the activity.
83. Since the previous injunction lapsed on 1 February 2021, Wolverhampton City Council has been contacted by resident, Mrs Jennifer Bateman, who lives near to the Black Country Route. Mrs Bateman provided a witness statement to support the previous injunction application in 2014. In her 2021 statement, Mrs Bateman reports a significant increase in car cruising activity since the previous injunction lapsed on 1 February 2021. I understand the statement of Jennifer Bateman will be included at page B118 in the bundle of documents available to the court filed in support of this matter.
84. On Sunday 11 April 2021, I received a message from Mrs Rachel Fanthom who is an anti-social behaviour officer in Wolverhampton Anti-social Behaviour team. Mrs Fanthom alerted me to an incident of car cruising she had witnessed the previous evening, Saturday 10 April 2021. Mrs Fanthom has subsequently provided a witness which I understand will be included at page B115 in the bundle of documents available to the court filed in support of this application.
85. In her witness statement, Mrs Fanthom describes that at 23:05 hours on 10 April 2021, 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.



86. 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.
87. 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.
87. 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.
88. 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 get 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.
89. 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 83 above, has reported a significant increase in noise from car cruising since the previous injunction lapsed on 1 February 2021.
90. On Saturday 17 April 2021 at 23:43 hours, I 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, I 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 JM15**.

91. Although at the time of writing I have not had the opportunity to speak to Mrs Bateman about the events of the evening of 10 April 2021, I am in no doubt she and her husband would have been exposed to the noise of the engines, modified exhausts and horns. I remain very concerned for the well-being of Mr and Mrs Bateman, Mrs Fox and her family as well as all the other residents whose lives are being made a misery because of the anti-social activity of car cruising.
92. In regard to Dudley, in her witness statement Faye Willetts reports a similar situation in the Halesowen area. Mrs Willetts states that since the injunction lapsed at the end of January 2021, she has noticed that in addition to the weekend events, there have also been regular incidents whereby she is woken at around 2am by the sound of vehicles racing along Manor Way. Mrs Willetts states that during the week commencing 15 March 2021, she and her husband were woken by these activities on Monday, Wednesday and Sunday evening. She states that on each occasion the racing continued for around an hour and she believes that it stopped only when the police arrived, having been called by Mrs Willetts' husband and other residents.
93. Mrs Willetts says that she believes that the Shell Petrol Station on Manor Way, Halesowen, is being used as a meeting point for these individuals and that residents have reported seeing 'donuts' being performed on the forecourt. Mrs Willetts states that she is concerned about this because, if one of these stunts were to go wrong and the vehicle were to hit a petrol pump, there could be a very serious risk of harm, not only to those involved but to innocent families using the petrol station.
94. Mrs Willetts goes on to say that the noise from this street racing is distressing to her as the loud engines/exhausts make it hard to relax or sleep; she states this situation is making her anxious and, as the activity is happening so often, she is finding it hard to function at work, which is extremely stressful to her. She reports that many of the vehicles are modified as the sound of the engine revving is amplified and one vehicle backfires often which sounds like a gun going off. She is also worried that there may be a crash due to the dangerous and high-speed driving. I understand Mrs Willetts' witness statement will be included at page D41 in the bundle of documents available to the court filed in support of this matter.
95. The second statement of Sue Haywood, Head of Community Safety at Dudley Metropolitan Borough Council, dated 13/04/2021 confirms the issues being reported

by the residents of Halesowen. Mrs Haywood reports that she attended a newly formed residents' association meeting on 9 April 2021, chaired by James Morris MP. At this meeting, the residents expressed their concern about the gatherings of racers, which they said, was happening two or three times per week, especially at weekends. The residents stated that there are often up to fifty vehicles involved. It is felt that they are attracted by the fast, straight stretch of road, easy proximity to the motorway and Birmingham, and the perceived lack of consequences following the lapse of the earlier injunction in February 2021. Ms Haywood states that there is also concern from residents about the spectators that this car cruising activity attracts.

96. At the residents' meeting on 9 April 2021, Mr Morris MP expressed real concern at the behaviour and offered to lend his support in whatever way he could. Mr Morris MP has provided a letter of support which is exhibited in Ms Haywood's second statement. Ms Haywood states that it was clear from this meeting that the local police are working hard to address the problem in the interim through use of aerial drones to gather information, writing to participants and/or their insurers, use of Covid-19 regulations that prohibited social gathering, setting up a 'Speedwatch' scheme involving local residents, impounding vehicles and the possible installation of extra cameras on the forecourt of the Shell station. However, Ms Haywood goes on to say that it was strongly felt by all that such measures would better supplement the injunction rather than operate in its stead. I understand the second statement of Sue Haywood will be included at page D1 in the bundle of documents available to the court filed in support of this application.
97. In his second witness statement dated 13/04/2021, PC Jonathan Edwards references car cruising incidents in and around Manor Way in Halesowen outlined in paragraphs 90 to 94 above. PC Edwards states that following the lapse of the previous injunction, between 3 February 2021 and 5 April 2021 there were 196 police logs relating to vehicles excessively speeding, racing, being driven aggressively and revving of engines. Of these logs, 154 relate to car cruise activities along Manor Way, Halesowen and include references to 'boy racers'. In his statement, PC Edwards provides a brief summary of each of the logs. I understand the second statement of PC Jonathan Edwards will be included at page C5 in the bundle of documents available to the court filed in support of this application.

98. Also in Dudley, in her witness statement of 11/04/2021 local resident Pat Bradley reports ongoing issues with car cruising around the Merry Hill Centre. She states that for the past year she has regularly been disturbed by the noise of cars racing, revving engines and screeching tyres around a nearby industrial estate and on the dual carriageway past the Merry Hill Centre. Ms Bradley goes on to state that there is no particular pattern, but that the activity usually takes place at weekends. She reports that the nuisance behaviour has been less frequent during 'lockdown' but that it is still happening. Ms Bradley says that she finds the nuisance distressing and that it is hard for her to relax and to sleep. She also states that she is worried someone could be seriously injured or killed. I understand the witness statement of Pat Bradley will be included at page D37 in the bundle of documents available to the court filed in support of this application.
99. In his third statement dated 09/04/2021, Pardip Sandhu from Sandwell Metropolitan Council provides an update on the current situation from the perspective of Sandwell residents who gave witness statements in 2013/2014 to support the first injunction application. During week commencing 05/04/2021, Mr Sandhu contacted five of the original complainants and all five are in support of an injunction to prohibit car cruising. Two of the residents report that they can hear the associated noise; two have moved out of the area but still support the injunction because of concerns for the residents still living there.
100. Mr Sandhu reports the issue with car cruisers is having an impact throughout the borough of Sandwell and that the Council continues to receive reports of noise nuisance and car cruisers in all of the six towns in Sandwell. I understand the third statement of Pardip Sandhu will be included at page E25 in the bundle of documents available to the court filed in support of this application.
101. As far as Walsall is concerned, Steve Gittins, Community Protection Team Leader at Walsall Metropolitan Borough Council has provided a second statement in regard to updates from residents and business owners he has been in contact with during early April 2021.
102. Mr Gittins states that whilst there are still some problems associated with car cruising related activity within the borough, reports to both the police and the council remain significantly reduced when compared to pre-2015 levels. Of the seven individuals contacted by Mr Gittins in April 2021, only one person reports noticing

an increase in noise from cars racing recently. However, all six of them fear that without an injunction in place it is only a matter of time before the situation deteriorates to what it was pre-2015 when the previous injunction came into force. I understand the second statement of Steven Gittins will be included at page F1 in the bundle of documents available to the court filed in support of this application.

**The regional and national ‘picture’ and risk of displacement**

103. The court will be aware that there are currently injunctions in place prohibiting car cruising (including ‘spectators’) in both Birmingham and Solihull.
104. In 2019, I 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.
105. As outlined in the second witness 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. I know from my 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.
106. 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.
107. In December 2019, at the request of Newport City Council (Gwent), representatives from Wolverhampton City Council’s Legal Services and I 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.

108. 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 JM16** 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.
109. 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**

110. Therefore, 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.
111. 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).
112. 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.

### **Conclusion**

113. In summary, 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.
114. 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.
115. 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 March and April 2021, 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.
116. 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 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.
117. 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 stated in paragraph 73 of my statement, when considering this injunction application, I respectfully request the court to consider the inclusion of a prohibition on spectators for the



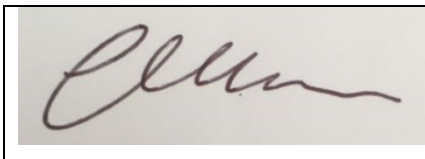
reasons outlined in paragraphs 65 to 72 above, including the evidence provided by PC Mark Campbell and Chief Superintendent Ian Green.

118. 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, there was, and continues to be, a strong partnership approach to this issue between West Midlands Police and the four Black Country councils to tackling the issue of car cruising, and this 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**



**Date** 19.04.2021

**Print name in full** JOANNE MASON

i) Statement of: Joanne Mason  
ii) Statement No: First  
iii) For: Claimant  
iv) Dated: 19 April 2021  
v) Exhibits: JM1-JM16

**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**

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**EXHIBIT JM1**

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This is the document referred to as "Exhibit JM1" in the witness statement of Joanne Mason dated 19 April 2021.

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

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WITNESS STATEMENT OF LISA FOX

---

I Lisa Fox of 16 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 13<sup>th</sup> 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 24<sup>th</sup> 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 

Print Name LISA FOX

Dated 2. 11. 13

i) Statement of: Joanne Mason  
ii) Statement No: First  
iii) For: Claimant  
iv) Dated: 19 April 2021  
v) Exhibits: JM1-JM16

**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**

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**EXHIBIT JM2**

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This is the document referred to as "Exhibit JM2" in the witness statement of Joanne Mason dated 19 April 2021.

- 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**

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**WITNESS STATEMENT OF PETER JAMES**

---

I, Peter James of 72 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 2<sup>nd</sup> 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 (1<sup>st</sup> exit) I continued to the next island which the 3<sup>rd</sup> 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: Joanne Mason  
ii) Statement No: First  
iii) For: Claimant  
iv) Dated: 19 April 2021  
v) Exhibits: JM1-JM12

**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**

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**EXHIBIT JM3**

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This is the document referred to as "Exhibit JM3" in the witness statement of Joanne Mason dated 19 April 2021.

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 238 Field Road, Bloxwich, WS3 3HZ, WILL SAY AS FOLLOWS:

1. I am Carl Yeomans and I live at the address stated above.
2. On 15<sup>th</sup> 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 28<sup>th</sup> 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 4<sup>th</sup> 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 9<sup>th</sup> 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: Joanne Mason  
ii) Statement No: First  
iii) For: Claimant  
iv) Dated: 19 April 2021  
v) Exhibits: JM1-JM16

**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**

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**EXHIBIT JM4**

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This is the document referred to as "Exhibit JM4" in the witness statement of Joanne Mason dated 19 April 2021.

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

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WITNESS STATEMENT OF LISA PARMAR

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I, Lisa Parmar of 55 Short Street, Wednesbury, WILL SAY AS FOLLOWS:

1. I am Lisa Parmar of 55 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 18<sup>th</sup> 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 19<sup>th</sup> 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**

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**EXHIBIT LP1**

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**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**

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**EXHIBIT LP2**

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





B 46  
H 88

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**

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**EXHIBIT LP3**

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**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**

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**EXHIBIT LP4**

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



B 50  
H 92

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**

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**EXHIBIT LP5**

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**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

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EXHIBIT LP6

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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**

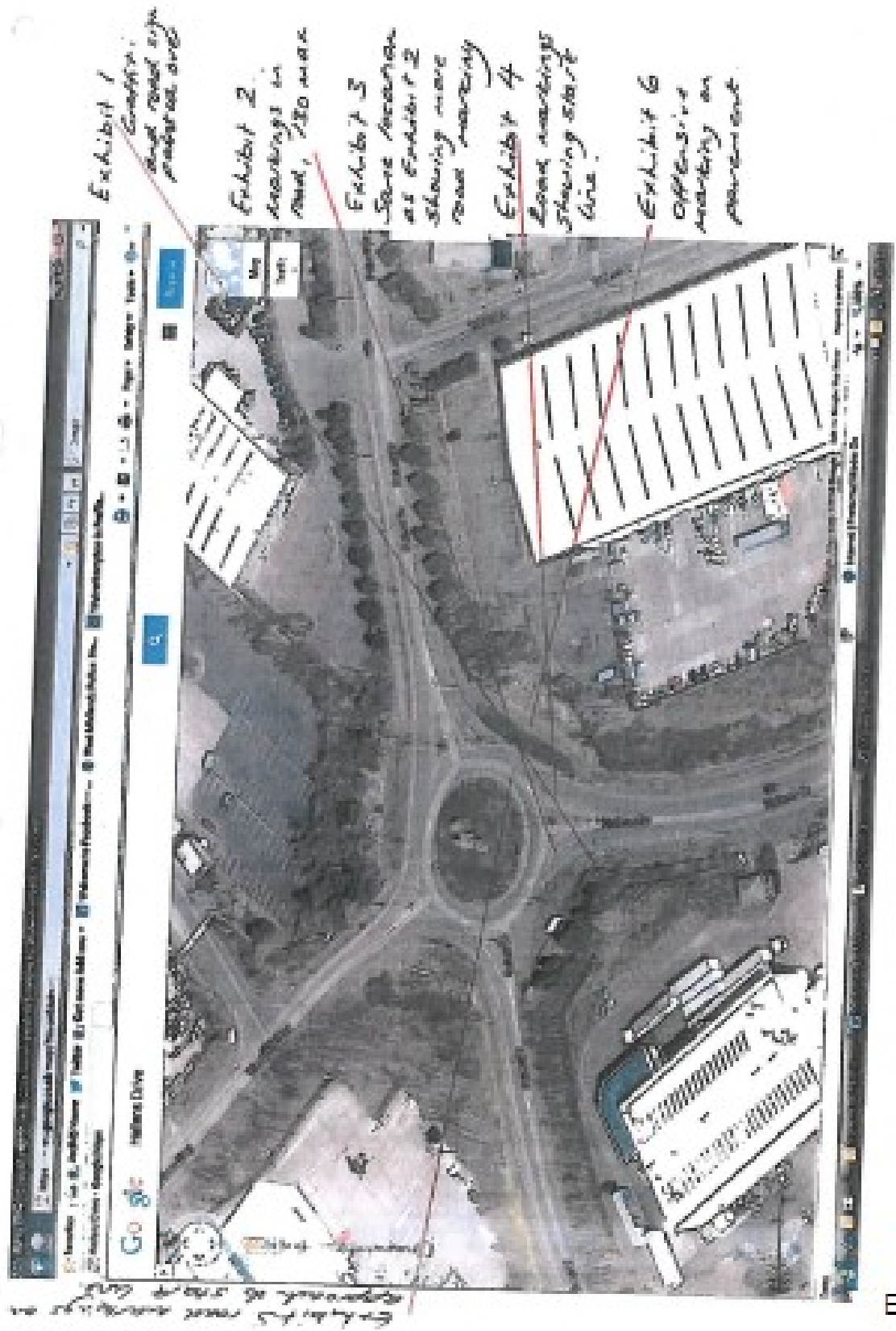
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**EXHIBIT LP7**

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





E

i) Statement of: Joanne Mason  
ii) Statement No: First  
iii) For: Claimant  
iv) Dated: 19 April 2021  
v) Exhibits: JM1-JM16

**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**

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**EXHIBIT JM5**

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This is the document referred to as "Exhibit JM5" in the witness statement of Joanne Mason dated 19 April 2021.

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 D/t<sub>1</sub>] 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 D/p<sub>1,2</sub>] 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 DAVID P. CLARK

Dated 12<sup>th</sup> 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**

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**EXHIBIT DPC1**

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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**

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**EXHIBIT DPC2**

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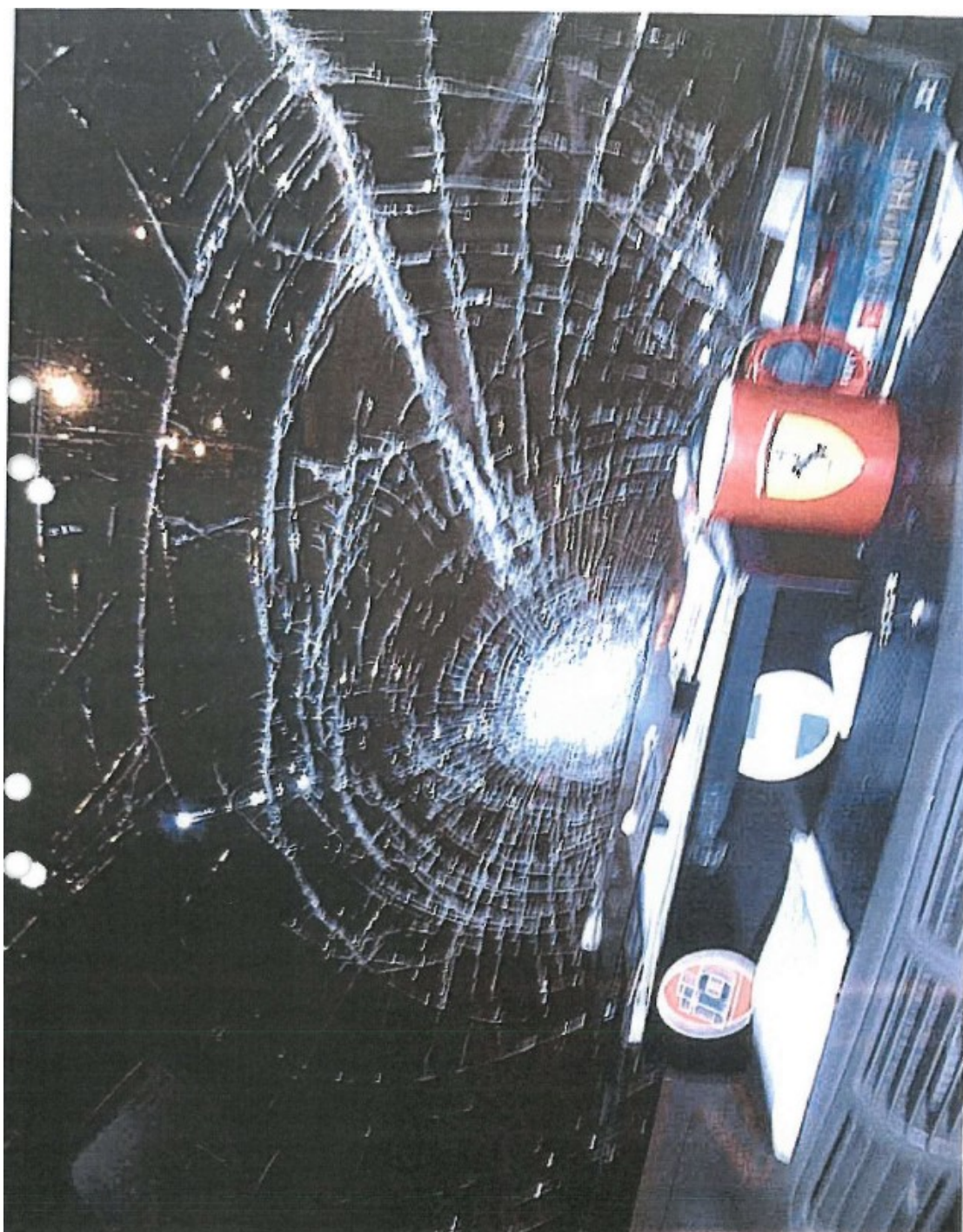
**This is the document referred to as Exhibit DPC2 in the witness statement of  
David Phillip Clarke dated 12.03.2014**

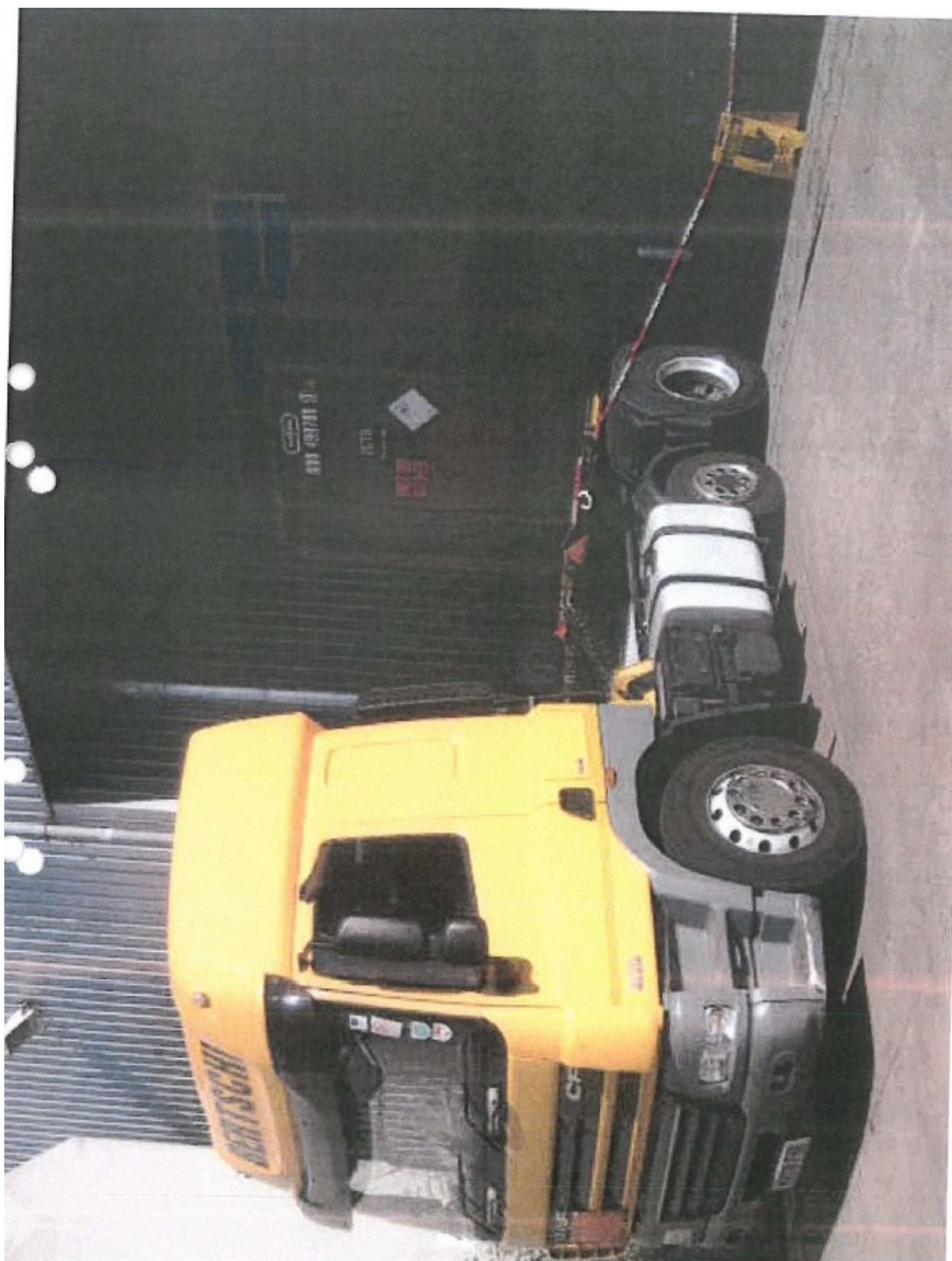


B 65  
H 107









B 68  
H 110





B 69  
H 111



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: Joanne Mason  
ii) Statement No: First  
iii) For: Claimant  
iv) Dated: 19 April 2021  
v) Exhibits: JM1-JM16

**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**

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**EXHIBIT JM6**

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This is the document referred to as "Exhibit JM6" in the witness statement of Joanne Mason dated 19 April 2021.

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 305 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 Pullford

Name of Claimant: Sandwell Metropolitan Borough Council

Signed 

Print Name L. PULLFORD

Dated 11 / 11 / 13



i) Statement of: Joanne Mason  
ii) Statement No: First  
iii) For: Claimant  
iv) Dated: 19 April 2021  
v) Exhibits: JM1-JM16

**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**

---

**EXHIBIT JM7**

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This is the document referred to as "Exhibit JM7" in the witness statement of Joanne Mason dated 19 April 2021.

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 30 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 16<sup>th</sup> 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 Sedgemore 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: Joanne Mason  
ii) Statement No: First  
iii) For: Claimant  
iv) Dated: 19 April 2021  
v) Exhibits: JM1-JM16

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

**CLAIM NO:**

**B E T W E E N:**

(9) WOLVERHAMPTON CITY COUNCIL  
(10) DUDLEY METROPOLITAN BOROUGH COUNCIL  
(11) SANDWELL METROPOLITAN BOROUGH COUNCIL  
(12) WALSALL METROPOLITAN BOROUGH COUNCIL  
Claimants

**and**

**PERSONS UNKNOWN**  
Respondents

---

**EXHIBIT JM8**

---

This is the document referred to as "Exhibit JM8" in the witness statement of Joanne Mason dated 19 April 2021.

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:

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 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 10<sup>th</sup> 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  2013

Print Name JOHNATHAN PHILIP HARFORD

Dated 16/11/13

i) Statement of: Joanne Mason



ii) Statement No: First  
iii) For: Claimant  
iv) Dated: 19 April 2021  
v) Exhibits: JM1-JM16

**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 JM9**

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This is the document referred to as "Exhibit JM9" in the witness statement of Joanne Mason dated 19 April 2021.

i) Statement of: *Richard Hardy*  
ii) Statement No: 1  
iii) For: *Claimants*  
iv) Dated: *06.11.2012*  
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 RICHARD HARDY

---

I, Richard Hardy of 58 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 6<sup>th</sup> NOVEMBER 2013

i) Statement of: Joanne Mason  
ii) Statement No: First  
iii) For: Claimant  
iv) Dated: 19 April 2021  
v) Exhibits: JM1-JM16

**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**

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**EXHIBIT JM10**

---

This is the document referred to as "Exhibit JM10" in the witness statement of Joanne Mason dated 19 April 2021.

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](http://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

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: Joanne Mason  
ii) Statement No: First  
iii) For: Claimant  
iv) Dated: 19 April 2021  
v) Exhibits: JM1-JM16

**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**

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**EXHIBIT JM11**

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This is the document referred to as "Exhibit JM11" in the witness statement of Joanne Mason dated 19 April 2021.

EXHIBIT JM11 IS VIDEO FOOTAGE OF THE CAR CRUISING  
INCIDENT/'PURSUIT' THAT TOOK PLACE IN JULY 2020 ON  
BLACK COUNTRY NEW ROAD AND BIRMINGHAM ROAD  
(shared on One Drive)

i) Statement of: Joanne Mason  
ii) Statement No: First  
iii) For: Claimant  
iv) Dated: 19 April 2021  
v) Exhibits: JM1-JM16

**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**

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**EXHIBIT JM12**

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This is the document referred to as "Exhibit JM12" in the witness statement of Joanne Mason dated 19 April 2021.

## 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

Ellie Underhill died days after falling from the bonnet of a car driven outside Tesco Extra in Dudley on Boxing Day 2016



:expressandstar.co.uk



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.

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.

i) Statement of: Joanne Mason  
ii) Statement No: First  
iii) For: Claimant  
iv) Dated: 19 April 2021  
v) Exhibits: JM1-JM16

**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 JM13**

---

This is the document referred to as "Exhibit JM13" in the witness statement of Joanne Mason dated 19 April 2021.

## Stevenage car meet crash: Police name two men charged after 19 people hurt in horror crash

The incident took place almost a year ago during a car meet event

SHARE



By **Alice Cunningham** Multimedia Journalist  
16:55, 1 JUL 2020

NEWS

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In YourArea



Crowds had gathered for the charity car meet (Image: SWD Media)

Two men have been charged in connection with a horror crash in Stevenage that saw 19 people injured.

On July 18 last year, police were called to **Monkswood Way** at around 9.45pm to reports that **two cars had been driven into a large crowd** of people.

The crash happened during a local car meet event.

Witnesses at the time described how they saw people "fly" into the air when the cars hit the crowd.

After emergency services arrived at the scene, they found that a total of 19 people had been injured, some seriously.

**H READ MORE**

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It was understood at the time that the crash happened during the weekly meet of the modified car club Cruise Herts, which aimed to help raise money for charity.

Almost a full year later, two men have now appeared in court in relation with the crash.

Dominic Brown, 21 of Park Street Lane in **St Albans**, and Julian Castano-Perez, 21 of Fitzwalter Place in Dunmow, Essex, appeared at Stevenage Magistrates' Court earlier today (July 1).

Both men were charged with eight offences of serious injury by dangerous driving and 11 offences of wanton/furious driving.

The two men are now due to appear in St Albans Crown Court for a plea and direction hearing on August 3.

Following the incident, Stevenage Council planned to ban future car meets and the organiser of the event revealed that the meets were finished with.