

B E T W E E N:

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

Claimants

-and-

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

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

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

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

5. Mr ANTHONY PAUL GALE

6. Miss WIKTORIA SCZCUBLINSKA

7. Mr ISA IQBAL

8. Mr MASON PHELPS

Defendants

**CLAIMANTS' APPLICATION FOR INJUNCTIVE RELIEF
BUNDLE OF DOCUMENTS FOR USE AT A HEARING LISTED 27 FEBRUARY AND
28 FEBRUARY 2024**

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A. SECTION A - Statements of Case

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

KB-2022-BHM-000188

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

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-and-

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SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR
OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

Defendants

REPORT ON BEHALF OF THE
CLAIMANTS ON THE OPERATION
OF THE INJUNCTION

Introduction

- 1 On 13 February 2023 the Honourable Mr Justice Freedman granted the Claimants an interim injunction that sought to address the issue of Car Cruising/Street Racing that was being carried on in their local authority areas.
- 2 That order continued an urgent without notice injunction that had been granted by the Honourable Mrs Justice Hill on 21 December 2022.
- 3 Subject to the addition of a fourth Defendant those orders were continued by order of the Honourable Mr Justice Ritchie, sealed on 23 May 2023 [D145]

4 Ritchie J directed *inter alia* that the matter return to court for a further review hearing and

“Not less than 7 days prior to the hearing the Wolverhampton claimants...shall file with the Court case summaries to inform the Court of the current position in particular in relation to the awaited judgment of the Supreme Court in *Wolverhampton CC v London Gypsies and Travellers and others* [2022] UKSC/0046 and any current enforcement proceedings and Defendants to be named in connection with the interim injunction and/or the power of arrest.” [D149/4(c)]

5 This is that Report. I am Adam Sheen, Solicitor-Advocate (Civil and Criminal) and employed as Senior Solicitor with Wolverhampton City Council. I have the authority of all four Claimants to submit this Report on their behalf.

6 In compiling the report I have relied on several sources of information. That information will be before the court in the form of witness statements. I do not intend to repeat the witness statements but will, where appropriate, refer to the information contained therein.

7 The witness statements are contained in a bundle filed with the court. References to the bundle appear in square brackets with the page

number appearing first followed if appropriate by the paragraph number.

Publication

- 8 The Tenth to Fifteenth [B30-195], witness statements of Paul Brown address the issue of compliance with the terms of the orders regarding publicity.
- 9 The Tenth and Eleventh witness statements address the steps taken to publicise the hearing in May 2023 before Ritchie J and the partial non-compliance with the earlier orders.
- 10 The Twelfth witness statement [B83-90] sets out the steps taken to comply with the order of Ritchie J with regard to publicising the outcome of the hearing on 19 May 2023.. The Thirteenth witness statement [B123-125] sets out the steps taken to publicise the Amended Claim Form.
- 11 The Fourteenth witness statement [B128-136] addresses steps taken to publicise this hearing following a change to the date of hearing. The Fifteenth witness statement [B185-188] provides details of the First Claimant's social media activities to publicise the orders.

Operation

12 The Injunction has now been in effect for over nine months and has achieved a substantial measure of success. However, the longer summer evenings have seen a rise in street racing and an increase in the activities of the Police to restrain it. Residents remain concerned about the effects of street racing and complaints have increased.

13 I refer to

- (1) The Fourth witness statement of Pardip Nagra [B1-5] and the exhibits thereto [B6-18]
- (2) The witness statement of PC Mark Campbell (West Midlands Police) [B25-29]. The officer states that:
 - (a) Organisers are getting more sophisticated [B26/3];
 - (b) Large-scale enforcement is now taking place [B26/4];
and
 - (c) Criminal proceedings are being used against organisers [B27/5].
- (3) A particular concern is signage being destroyed in an attempt to frustrate the operation of the Injunction. Please see the witness statement of Pardip Nagra [B4/14] and PC Mark Campbell [B27/8].

Enforcement

14 During the course of the hearing before Ritchie J on 19 May 2023 the judge expressed the view that the if the Injunction was necessary so was enforcement ("use it or lose it"). Since then enforcement has been used actively in conjunction with the Police.

15 At present the Claimants are involved in a number of sets of contempt proceedings:

- (1) Gale (Sandwell)
 - (a) 28 May 2023
 - (b) Kenrick Way
 - (c) Hearing listed 3 October 2023
- (2) Iqbal (Wolverhampton)
 - (a) 28 May 2023
 - (b) Black Country Route
 - (c) Hearing listed 3 October 2023
- (3) Szczublińska
 - (a) 28 May 2023
 - (b) Kenrick Way
 - (c) Hearing listed 3 October 2023
- (4) Mason Phelps (Sandwell).
 - (a) 29 July 2023

- (b) Kenrick Way
- (c) Adjourned for Defendant to obtain legal advice
- (5) Richold
 - (a) September 2023
 - (b) Hearing 28 September 2023

The Supreme Court

16 At the time of writing there is no indication of when the Supreme Court is likely to give judgment of the Supreme Court in *Wolverhampton CC v London Gypsies and Travellers and others* [2022] UKSC/0046.

17 The Court will reconvene on 2 October 2023. The Court did give a judgement on 20 September 2023 for a case heard in January 2023¹.

Conclusions

18 All four Claimants support the continuation of the Injunction and regard it as effective in reducing anti-social behaviour and promoting public safety.

¹ Republic of Mozambique (acting through its Attorney General) (Appellant) v Privinvest Shipbuilding SAL (Holding) and others (Respondents)



Claim Form (CPR Part 8)

In the High Court of Justice, King's Bench Division Birmingham District Registry											
Claim no.	KB-2022-BHM-000188										
Fee Account no.	PBA0082797										
Help with Fees - Ref no. (if appli- cable)	<table><tr><td>H</td><td>W</td><td>F</td><td>-</td><td></td><td></td><td>-</td><td></td><td></td><td></td></tr></table>	H	W	F	-			-			
H	W	F	-			-					

Claimant

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



Defendant(s)

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

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

Details of claim (see also overleaf)

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

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

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

Defendant's
name and
address

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

£

Court fee	569.00
Legal representative's costs	
Issue date	

For further details of the courts 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.

Details of claim (continued)

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

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

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

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

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COUNCIL
3. SANDWELL METROPOLITAN BOROUGH
COUNCIL
4. WALSALL METROPOLITAN BOROUGH
COUNCIL

Claimants

-and-

PERSONS UNKNOWN

Defendant

AMENDED PARTICULARS OF
CLAIM

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

Ref: LIJ017753P/01201576

Solicitor for the Claimants

Amended pursuant to permission of the Court (Ritchie J) on 19 May 2023

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

Claim No. KB-BHM-2022-000188

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

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Defendants

AMENDED PARTICULARS OF
CLAIM

Introduction

- 1 Part 8 of the Civil Procedure Rules 1998 applies to this claim.
- 2 In these Particulars of Claim the following definitions have been applied:
 - (1) "The Black Country" the combined local authority areas of all the Claimants. The Claimants areas are shown on the plan annexed hereto (Plan A).
 - (2) "Car Cruising" organised or impromptu events at which drivers of cars race, perform driving stunts, drive dangerously and drive in convoy. Such activities may be noisy, dangerous and illegal, obstructing highways and the premises bordering them, damaging property and putting the safety of spectators and other persons at risk.

- (3) The "Original Injunction" Injunction granted by HHJ Owen QC on 1 December 2014 and renewed by HHJ McKenna on 9 January 2018 in *Wolverhampton & Others v Persons Unknown* [2014] (Claim No A90BM228) which was in effect from 2 February 2015
 - (4) "Stunts" Driving manoeuvres often undertaken as part of car cruising including:
 - (a) "Burnouts" Causing a vehicle to destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed.
 - (b) "Donuts/Donutting" Causing a vehicle to rotate around a fixed point (normally the front axle) while not moving-off causing noise, smoke and tyre marks to be created.
 - (c) "Drifting" Turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input.
 - (d) "Undertaking" passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code.
- 3 The Claimants are local authorities with the meaning of the Local Government Act 1972.
- 4 The West Midland Police Force ('the Police') serve the areas of all the Claimants.

5 Since, at least, 2012 the Claimants have, in co-operation with the
Police, have been attempting to eliminate car cruising in their areas.

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

Background

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

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

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

Relevant Enactments

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

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

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

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

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

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

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

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

(a) they may prosecute or defend or appear in any legal proceedings and, in the case of civil proceedings, may institute them in their own name, and

(b) they may, in their own name, make representations in the interests of the inhabitants at any public inquiry held by or on behalf of any Minister or public body under any enactment.”

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

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

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

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

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

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

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

Factual Background

21 The Claimants will rely upon the witness statements filed with this Claim Form and those filed in support of the adjourned application to extend the Original Injunction.

22 In summary the Claimants aver that:

- (1) Persons participating in car cruising meet on highways and areas adjacent to highways. Such areas include industrial estates and car parks.
- (2) The locations for such meetings vary but are to be found throughout the Black Country.
- (3) Such meetings may be publicised in advance via social media or word of mouth or may be impromptu.
- (4) At such meetings some or all of conduct set out above takes place.
- (5) Such conduct affects the safety, comfort, well-being and livelihoods of inhabitants of the Black Country.
- (6) Such conduct diverts the resources of the Police, Ambulance Service and hospitals away from other legitimate matters.

23 The Original Injunction was effective in reducing and inhibiting car cruising.

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

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

25A The conduct described above frequently involves the commission of criminal offences which is deliberate and which cannot adequately be prevented or restrained by the use of criminal law sanctions.

25B Such offences may include but are not limited to:

- (1) Dangerous driving;
- (2) Speeding;
- (3) Racing;
- (4) Driving without insurance

25C The said conduct is also tortious and, in particular, constitutes a public nuisance.

25D Further, by engaging in the conduct described above, the Defendants infringe or threaten to infringe

- (1) other road users' and pedestrians' right to life, pursuant to Article 2, European Convention on Human Rights (the "Convention").

On 20 November 2022 a fatal road traffic collision occurred in the area of the Third Defendant when a vehicle collided with persons spectating at a cruise/street race.

and/or

- (2) the right to respect for the private and family lives, pursuant to Article 8, Convention, of residents living in the locality of the roads or spaces used for street-cruising.

25E While all persons have the right to freedom of association and peaceful assembly (Convention, Art.11), such rights are qualified and may lawfully be interfered with in the interests of public safety, for the prevention of disorder or crime, for the protection of health or morals or for the protection of the rights and freedoms of others.

25F Such rights do not extend to permitting the commission of serious criminal activity that imperils the lives of others.

25G Injunctive relief sought is necessary in a democratic society and is proportionate. It represents the only way to protect the rights referred to above and is in accordance with a legitimate aim.

Justification for an Injunction

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

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

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

Power of Arrest

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

"(1) This section applies to proceedings in which a local authority is a party by virtue of section 222 of the Local Government Act 1972 (c 70) (power of local authority to bring,

defend or appear in proceedings for the promotion or protection of the interests of inhabitants of their area).

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

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

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

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

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

Service of this Claim Form

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

may wish to oppose the making of the order or intervene in the proceedings.

Service of any Injunction Granted

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

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

And the Claimants claim:

- (1) An Injunction Order in the form annexed hereto;
- (2) A Power of Arrest ancillary to such Injunction;
- (3) Such further or other relief as the Court thinks fit.

MICHAEL SINGLETON

DATED this 07 day of October 2022

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

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

FULL NAME DAVID PATTISON

POSITION OR OFFICE HELD: CHIEF OPERATING OFFICER

SIGNED 

REDATED this Sixth day of June 2023

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

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

FULL NAME: DAVID PATTISON

POSITION OR OFFICE HELD: CHIEF OPERATING OFFICER

SIGNED 

Adam Sheen

From: noreply@thomsonreuters.com
Sent: 07 June 2023 12:34
To: Litigation; Tracey Christie
Subject: Filing Submission Case No. KB-2022-BHM-000188

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Adam Sheen

From: noreply@thomsonreuters.com
Sent: 07 June 2023 12:36
To: Litigation; Tracey Christie
Subject: Filing Submission Case No. KB-2022-BHM-000188

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B. SECTION B - Evidence Filed on Behalf of the Claimant

For: Claimants
Statement of: Pardip
Nagra
Statement no: 4
Exhibits: PN1-PN3
Date: 21.09.2023

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

CLAIM NO: KB-2022-BHM-000188

BETWEEN:

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

Claimants

-and-

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

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

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

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

Defendants

WITNESS STATEMENT OF PARDIP NAGRA

I, Pardip Nagra, Anti-Social Behaviour Team Leader of Wolverhampton Homes, Wednesfield Housing Office, Alfred Squire Road, Wednesfield, Wolverhampton, WV11 1XU, WILL SAY AS FOLLOWS:

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief.
2. I make this statement further to my statement dated 2nd May 2023 and following the interim injunction that was granted by Mrs Justice Hill sitting at the High Court (Royal Courts of Justice) London on 21st December 2022 against persons unknown regarding the issue of street racing within the Black Country.
3. I can advise that Wolverhampton's Anti-social behaviour (ASB) Team have received an increase in complaints of street racing within Wolverhampton, in recent months. Residents, often anonymously, have reported street racing occurring on weekends and on occasions, during mid-week.
4. Residents have advised that they are being caused nuisance, annoyance and distress by the street racing and have also expressed concerns for other road users whilst racers drive at such dangerous and erratic speeds.
5. Examples of complaints of street racing received by Wolverhampton's ASB Team are detailed within two anonymous emails that the ASB Team received in their ASB Duty email inbox on Sunday 10th September. The first email, received at 00.01 on 10th September detailed that hundreds of cars were racing and revving their engines on Overfield Drive, Bilston, Wolverhampton. The author of the email advised that they were considering selling their home as they could no longer deal with the noise from the street racing.

6. The second email, received at 0951 on 10th September detailed approximately 100 cars were racing on the Black Country Route in Wolverhampton and that another group were parked and revving their engines on Overfield Drive, Bilston, Wolverhampton. Copies of the above emails are here and exhibited to this statement as “**PN1**”.
7. Unfortunately, many of the emails that the ASB Team have received indicate that residents are unhappy with High Court injunction that has been sought in this matter as they do not feel that drivers/racers are abiding by the conditions of the injunction and are simply ignoring it.
8. Whilst the above feedback is of course disappointing, it does show that street racing within Wolverhampton is a continuing problem and that the need for a full injunction order is still required. Police resources are very stretched at present and due to the transient nature of street racing, Police are regularly faced with the challenge of directing their limited resources of Police patrols to areas before street racers have moved on to a different location within the Black Country or further afield.
9. Whilst enforcement of the High Court injunction has proved challenging as above, arrests of racers have been made and Wolverhampton currently have one breach of the injunction to be heard in upcoming committal proceedings.
10. In order to ensure that signage informing street racers of the interim High Court injunction in Wolverhampton is still in situ, I have recently requested Police to carry out a review of our signage. I am informed by PC 23140 Soomal-Goode that all signage erected in Wolverhampton, bar 3 small foamex signs on Springvale Avenue, Wolverhampton remain in situ. I can confirm that arrangements have been made to have the above foamex signs replaced within the coming weeks.

11. I have also liaised with representatives of Sandwell and Dudley Councils, in order to ascertain how the interim High Court injunction is affecting street racing within their local authority areas.
12. ASB Town Lead Pardip Sandhu, of Sandwell Metropolitan Council, informs me that Sandwell's ASB Team have continued to receive complaints of car cruising. The complaint received have included incidents of unknown persons riding off road motorcycles and quad bikes along canal towpaths, parks, fields and even setting them alight after use.
13. Five arrests have been made for alleged breaches of the High Court injunction for street racing. These alleged breaches have predominantly occurred on Kenrick Way, West Bromwich. Sandwell MBC are awaiting dates for committal proceedings in these matters.
14. Pardip Sandhu has also informed me that he carried out a review of signage along Kenrick Way on 7th September 2023 and found that two of the signs previously located there have been removed by unknown persons, without permission. It is Pardip's belief that the signs have been removed by persons involved or in support of street racing activities. The missing signs have since been re-ordered. A copy of Pardip Sandhu's statement detailing the above information is here and exhibited to this statement as exhibit "**PN2**".
15. Community Safety Officer Mark Wilson of Dudley Metropolitan Borough Council has also provided me with a statement regarding an update of street racing activities and signage within their Borough.
16. Mark advised that Dudley's Highways Department carried out an inspection of their street racing signage on 9th September 2023 and found that all signage was intact and free from damage. The only exception to this was a sign that required realigning so as to easily be viewed/read by road users. This sign is situated on the splitter island on the Manor Way at the George Road roundabout.

17. Mark also advised that street racing activities have continued within Dudley during the summer months, most notably at Manor Way, Halesowen, where residents advise that car cruising is regularly taking place. A copy of Mark Wilson's statement is here and exhibited to this statement as "**PN3**".
18. In view of the above information, I believe that street racing is still continuing within the Black Country and is in fact increasing in regularity. For this reason, I fully support the application for a full High Court injunction to address street racing and am willing to give evidence in support of the application.

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

Pardip Nagra

Date

21.09.23

Print name in full Pardip Nagra

EXHIBIT PN1

From: communications@wolverhamptonhomes.org.uk
<communications@wolverhamptonhomes.org.uk>
Sent: 10 September 2023 09:51
To: Anti Social Behavior Unit <asbu@wolverhamptonhomes.org.uk>
Subject: New ASB report from the WH website

Hi ASB team

Please see below details of a new ASB report which has been submitted on the WH website,

Contact details heading

Consent for storing submitted data

True

Privacy policy link

I would prefer to remain anonymous

False

Remain anonymous

Full name

Telephone number

Mobile number

Email address

Incident

Is this report related to an existing or previous case?

No, this is a new report

Case ID

Location of incident / address of the person you are reporting

Overfield Drive (WV14 9XW) and Black County Route Wolverhampton

Person involved

Approx 100 cars

Details of incident

Car racing and cruising at around 10:45pm to just after midnight. There was a large group of people racing on Black Country route and then coming onto Overfield Drive, where another group was parked up and revving their engines. They were playing music , making a lot of noise and made a mess too. The sound was very loud, did try and call 101 however could not get through - after 40 minutes cut the phone. I feel like the injunction is not helping at all, just wondering why can you not put up Speed Camera's ?

Your address details

Your address

Town or city

Postcode

Security check

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For: Claimants
Statement of: Pardip Sandhu
Statement no: 3
Exhibits:
Date: 15th September 2023

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2022-BHM-000188

BETWEEN:

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

Claimants

-and-

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

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

Defendants

WITNESS STATEMENT OF PARDIP SANDHU

I, Pardip Sandhu, Town Lead Anti-Social Behaviour Officer for Sandwell Metropolitan Borough Council, based in Oldbury, Sandwell, West Midlands, WILL SAY AS FOLLOWS:


1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief.
2. I make this statement further to my statement dated 27th September 2022 and following the interim injunction that was granted by Mrs Justice Hill sitting at the High Court (Royal Courts of Justice) London on 21st December 2022 against persons unknown regarding the issue of street racing within the Black Country.
3. With regard to street racing complaints received in Sandwell since the interim injunction was granted, Sandwell has continued to receive further complaints from local residents including complaints of car cruising, unknown persons riding off road motorcycles and quad bikes along canal towpaths, parks, fields and even setting them alight after use.
4. The calls for service have continued as they were prior to the interim injunction and has resulted in 5 arrests being made mainly on Kenrick Way, West Bromwich. These are currently awaiting hearing dates for committal proceedings in September and October 2023.
5. I can confirm that following recent events and arrests made on Kenrick Way, West Bromwich, I visited the sites on Thursday 7th September 2023 and from this visit I can report that two signs that were installed along Kenrick Way, are no longer present and their removal was not authorised.

6. I can confirm that the signs that were installed were visually verified, by ASB Manager Andrew Clarke after installation. I can advise that they have been removed without permission.
7. It is notable that the signs that remains, is located along a strip of the dual carriageway where there is no pedestrian footpath or easily accessible pedestrian access leading to it. As such, it is unlikely that spectators would have been at this location and an absence of associated litter supports this.
8. This sign remains in place and is located right by traffic lights, near to the island junction with Telford Way. Notably, this would normally be near what would constitute the logical Start or Finish line, for any street racing along Kenrick Way.
9. The Injunction is needed to deter further activity and for the Police and the local authority to take enforcement action against individuals involved in this activity.
10. I therefore fully support all the authorities in the application for the injunction.

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 September
2023

Print name in full Pardip Sandhu

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

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

Claimants

-and-

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

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

**WITNESS STATEMENT OF
PARDIP SANDHU**

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

CLAIM NO: KB-2022-BHM-000188

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

BETWEEN:

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

APPLICANTS

- and -

PERSONS UNKNOWN

RESPONDENTS

**SECOND WITNESS STATEMENT OF
MARK WILSON**

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

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

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

State of repair of the warning signs

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

Extent to which car cruising is a problem within the area

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

5. Since the injunction was granted on 22nd December 2022, complaints of street racing continue to be received in respect of Manor Way, Halesowen and these have increased during the recent summer months. We are also aware that there continues to be regular 'meet-up's' of groups in car parks across the borough to do 'donut' stunts and speed around the enclosed area. A 'donut' is a manoeuvre performed while driving a vehicle, which entails rotating the rear or front of the vehicle around the opposite set of wheels in a continuous motion, creating a circular skid-mark pattern of rubber on a carriageway and possibly even causing the tires to emit smoke from friction. This has happened in several locations (Waterfront and Showcase Cinema for example); largely at night but there have been such gatherings in the early evenings too.
6. I have witnessed footage on social media of car cruising across the black country and I have seen footage of cars congregating on Manor way in an unsafe way around the shell petrol station.
7. I believe that the injunction has had a positive effect and continues to be a necessary tool to ensure the public safety and protection of law abiding members of the public and businesses who have suffered for many years from the negative impact of car cruising and street racing. However, as sought, the terms of the injunction demonstrably need widening.

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

Name of Claimant: Dudley Metropolitan Borough Council

Signed  Date: 22/09/2023

Print Name in Full :MARK WILSON



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 Karam Soomal-Goode

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

Occupation: Response Officer

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: Karam Soomal 23140**Date:** Monday, 18 September 2023Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am PC 23140 SOOMAL-GOODE of the West Midlands Police, attached to Operation Hercules currently stationed at Chelmsley Police Station.

On Tuesday 12th September 2023, I conducted checks on the existing signs for the Black Country Car Cruising Injunction in Wolverhampton. The following signs were present and in order:

1. Black Country Route near Vulcan Road Roundabout near Bilston Town Football Club (Lamppost 152)
2. Black Country Route near Greenhous Volkswagen Van Centre (Lamppost 162)
4. Black Country Route parallel to Darlaston Brook (Lamppost 201)
6. Black Country Route parallel to Nice 1 Limited Off Coseley Road Island
7. Black Country Route near The Sugar Lump (Lamppost 138)
8. Black Country Route (Lamppost 16)
9. Black Country Route (Lamppost 29)
10. Black Country Route (Lamppost 32)
11. Springvale Avenue (Lamppost 2)
13. Springvale Avenue (Lamppost 7)

The following signs were present however they are blocked by overgrown trees and bushes:

5. Black Country Route parallel to McDonalds Off Coseley Road Island
12. Springvale Avenue (Lamppost 3)

There are no signs present at the following:

3. Black Country Route parallel to Lunt Road/Marbury Drive Junction
14. Springvale Avenue (Lamppost 22)
15. Springvale Avenue (Lamppost 25)

I informed the anti-social behaviour team leader Pardip Nagra of the above.

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

Signature: Karam Soomal 23140

Signature: Karam Soomal 23140

Investigation No.

Case Number

Statement of: Mrs Karam Soomal-Goode

Signature: Karam Soomal 23140

Claimants
Steven Gittins
Second Witness
Statement
22 September 2023

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

CLAIM NO. KB-2022-BHM000188

BETWEEN:

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

Claimants

-and-

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

Respondents

WITNESS STATEMENT OF STEVEN GITTINS

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

1. I make this statement further to that which I made on 3rd May 2023.
2. This statement relates to the Black Country boroughs' application for an injunction prohibiting people from engaging in street racing and 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. A further interim injunction was granted on 22 December 2022 and subsequently extended in February 2023. I provided evidence in support of both the original and subsequent applications.

3. There have to date been no applications for committals for breaches of the above injunction in the Borough of Walsall.
4. As per my previous statement It remains the case that problems associated with street racing and car cruising related activity within the borough, continue to be reduced since the original car cruising injunction and then subsequent injunctions came into effect.
5. Since making my previous statement in May of this year the Council's Community Protection Team has received a further 8 direct reports concerning anti-social behaviour relating to "joy riding/motor vehicles". Police report that since the 4th May this year, they have recorded 126 incident logs for the borough which contain the word racing. Although there are reports from across the borough, Darlaston, Moxley and Junction 9 of the M6/Black Country Route remain areas of concern.
6. Although the number and frequency of car cruising related incidents in Walsall has as previously reported reduced since the original injunction was granted, there remain areas of concern and reports of this ant-social activity and the dangers associated with it are still received and are of concern. The real concern remains that if an injunction were not in place and word of this spread, then the level of street racing and car cruising activity would increase, as would the danger and significant anti-social behaviour associated with it. Equally if Walsall were not included within any Black Country Order, there is a real risk that activity prohibited elsewhere would simply be displaced into the borough from its neighbours, facilitated by the arterial and other road networks.
7. It is still my belief that the grant of the previous injunctions has had a very beneficial effect in reducing the level of anti-social behaviour and significant danger caused by street racing and car cruising. It continues to be the case that 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. The injunction is an important means by which this can be achieved.

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

22/09/2023

Print name in full STEVEN JOHN GITTINS

Claimant
Steven Gittins
Second Witness
Statement
22 September 2023

IN THE HIGH COURT OF JUSTICE
CLAIM NO. KB-2022-BHM000188
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

For: Claimants
Statement of: PC Mark Campbell
Statement no: 3
Exhibits: -
Date: September 2023

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

CLAIM NO: KB-2022-BHM-000188

BETWEEN:

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

Claimants

-and-

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

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

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

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

Defendants

THIRD WITNESS STATEMENT OF PC MARK CAMPBELL

I, MARK CAMPBELL, Police Constable 6018 of West Midlands Police, currently stationed at Chelmsley Wood police station, WILL SAY AS FOLLOWS:

1. I am PC 6018 Campbell, and I am making this statement on behalf of the West Midlands Police in support of the claimant's application for a new Section 222 High Court street racing injunction in relation to Street racing within the Black Country local authority area.
2. I have been a Police officer for over 26 years and have worked on a number of specialist teams including Road Policing Unit. I am now the subject lead for Operation Hercules, which is the West Midlands Police tactical approach to combating street racing, which over the last couple of years has become an ever-growing issue.
3. I have been the West Midlands lead on this subject for 4 years, and in that time, I have witnessed the ever increasing professionally organised approach that the street racing organisers are taking to facilitate these events. I have had a leading role in a number of different tactics utilised to tackle the issue of street cruises and the inevitable anti-social behaviour caused. This application, however, is made knowing the positive impact a further injunction would have in supporting the Police to tackle the unlawful behaviour of the individuals who put the public at risk on a weekly basis.
4. I have been asked to provide evidence of the impact that the High Court interim injunction has had since my last statement from April 2023, and I can inform the court that during the last 4 months a number of large-scale enforcement operations have been conducted by Force Traffic, namely Road Harm Prevention Team. This has resulted in 6 drivers being arrested for breaching the Black Country High Court Street cruising injunction. These individuals are awaiting court hearings.

5. Running parallel with this type of enforcement, investigation work is taking place to target the main street racing organiser groups, previously 3 of these organisers have been arrested, two of which have pleaded guilty, and one is awaiting trial. Approximately 200 drivers have been prosecuted for various offences including careless driving, speeding and general common use type offences.
6. There is a perception within the general public is that car cruising has increased and that the Police and Local authorities are doing little to combat the illegal street racing within the streets of the Black Country and further afield. This is simply not the case, a dedicated team of officers are deployed every weekend to target illegal street racing, this team will also have the assistance of West Midlands Police traffic department and local Police teams.
7. The Police respond to reports of street racing in a number of ways including the use of intelligence systems, calls from the general public, and Police knowledge from previous dealings. However, the number of officers used on a weekly basis only detracts from other areas of Police work that cannot be tackled due to the Policing of the street cruisers.
8. As I had earlier touched on, over the last 4 months there have been 6 drivers arrested for breaching the Black Country Street Cruising Injunction, the majority of these arrests have taken place along Kenrick Way, Oldbury. A re-occurring argument raised by these drivers is "I didn't know there was an injunction" or "I didn't see any signs", in most cases the drivers will have passed a number of High Court Black Country Street Cruising Injunction signs advertising the presence of the injunction within that geographical area.
9. In my experience, the street racers that attend the street cruising events are a very tight group of individuals, who are all followers of the main street racing social media accounts and will be more than aware of the High Court injunction banning street cruising. I am aware that a number of posts on these social media sites have informed followers to deny any knowledge of the injunctions

within the West Midlands, but on speaking on a one to one with drivers who attend my diversion/educational course, they all admit knowing that there is an injunction in place, but due to sheer numbers of attendees they feel safe to attend believing that the chances are they will not be arrested.

10. With this in mind, officers from Operation Hercules have recently checked locations around the Black Country, where signage was placed advertising the Street cruising injunction, I can confirm that on Kenrick Way, Oldbury, there were originally three Yellow foamex boards attached to lampposts with cable ties, these signs advertised the injunction. However, all of these signs had been cut down presumably by spectators. I also found that one large metal sign on Black Country Route, Bilston, and two other foamex boards on Springvale Avenue had also been removed. The removal of these Injunction signs only goes to reinforce the belief that the racers can deny all knowledge of the injunction and therefore make them believe that they will not be prevent them from being prosecuted.
11. The number of street racing meets has naturally increased as we entered the Summer months, new tactics have been initiated in recent weeks that has and will continue to have a massive impact on the street racers, a worrying trend now is that the increased number of gatherings has attracted a larger number of spectators and the increased potential of threat to life from the dangerous driving shown by the attendees to the race meets.
12. Unfortunately, the more spectators that attend the meets the faster the drivers go and the more risks they take. I strongly believe that spectators should be covered under the terms of the High Court order, which currently they are not. The introduction of this power would give the Police the power to target this group of individuals who actively encouraging the poor driving.
13. I believe the application to renew the interim High Court Street cruising injunction within the Black Country area was required and I further believe an

injunction remains extremely necessary to deter large scale street cruising meets that blight the lives of local residents.

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

21. 9. 23

Print name in full MARK CAMPBELL

i) Statement of: Paul Brown
ii) Statement No: 10
iii) For: Claimants
iv) Dated: 09.5.2023
v) Exhibits: PB9A

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(ATTACHED)**

Defendants

TENTH WITNESS STATEMENT OF PAUL STEVEN BROWN

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

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief. This is my third statement in these proceedings.
2. The City of Wolverhampton Council is the authority which is leading the joint application of the Councils of Wolverhampton, Dudley, Sandwell and Walsall (hereinafter referred to as the “Black Country Boroughs”) seeking injunctive relief to restrain street racing (also referred to as car cruising) in the Black Country Boroughs.
3. I have been employed since 25 June 2007 as a Senior Communications Adviser and latterly Communications Manager in the communications team of the City of Wolverhampton Council.
4. In collaboration with my colleagues Pardip Nagra (ASB Team Leader) and Adam Sheen (Senior Solicitor, Legal Services) a communications plan has been developed, with the initial steps implemented, initially to raise awareness of the application to the High Court for an interim street racing injunction for the Black Country Area and, should the court be minded to grant this, to promote the existence of the injunction, and the power of arrest, once it is formally in place.
5. Recognising this is a joint enterprise, I have been liaising closely with my counterparts in the communications teams of Dudley, Sandwell and Walsall Councils and West Midlands Police. This is my tenth statement within these proceedings.
6. I make this statement to update the Court on activity pursuant to the Paragraphs 5(9) of the Injunction granted 21 December 2022 and paragraph 5(9) of the order of 13 February Sealed 16 February, in which the Claimants were required to:

“Request that West Midlands Police

(a) Post on their Website, Facebook, Twitter and Instagram account, a link to the media release [the release we send out telling the world about the grant of the injunction and the continuation of the injunction respectively]

(b) Ensure that copies of the Injunction and Power of Arrest are available at the Front Desks of their stations throughout the Black Country Area”.

These steps were to be completed by 23:59 on 23 December 2022 and 21 February 2023 respectively.

7. I am patently aware and humbly admit that not all of these steps were completed within the deadline set in paragraph 5 of the Injunction granted 21 December 2022 and paragraph 5(9) of the order of 13 February. This arose due to an oversight arising from the considerable efforts and focus the Claimants necessarily had on ensuring compliance with the many service steps required of them in the other paragraphs of the orders detailed above.
8. On behalf of the four Claimant Councils, I profusely and sincerely apologise to the Court and stress no disrespect was intended to the honourable court.
9. I can confirm that requests were made on a regular basis to West Midlands Police to share information via their social media channels, including that relating to the outcomes of the hearings in December and February as required in Paragraphs 5(9) of the Injunction granted 21 December 2022 and paragraph 5(9) of the order of 13 February Sealed 16 February. Please see **Exhibit PB10A attached hereto** for screengrabs of social media shared on Facebook and Twitter by West Midlands Police and the borough social media channels of Wolverhampton, Dudley, Sandwell and Walsall Police.
10. However, regrettably, a request for information to be posted on the West Midlands Police website was only made on 4 May 2023. This was complied with, via a link to the City of Wolverhampton Council street racing page where injunction, power

of arrest, review hearing notice and a wealth of information relating to the injunction application is laid out. Please see **Exhibit PB10A attached hereto**.

11. Further, a request was only made to West Midlands Police for the first time on 4 May 2023 to arrange for the printing and maintaining of hard copies of the injunction, power of arrest and review hearing notice at front desks of the police stations in the local policing units of Dudley, Sandwell, Walsall and Wolverhampton. The Council received confirmation from Police Constable Mark Campbell of West Midlands Police on 5 May 2023 that this request had been received and had been assigned to the necessary personnel within West Midlands Police to address such request.
12. Although the Claimants do not seek in any way to hide from this late compliance, I respectfully contend no prejudice has been caused and, respectfully suggest that it is the totality of the other publicity steps carried in by the Claimants, and in particular social media communications, all of which were completed timeously and well within the deadlines ordered by the honourable court, that will have had the greatest impact on disseminating information to Persons Unknown likely affected by this injunction and thereby serving the injunction, power of arrest and notices of hearings.
13. Nevertheless, I wish to place on record the Claimants' sincere and profuse apologies for this delayed compliance addressed herein which was entirely due to the Claimants' oversight. I further confirm a very careful note will be taken of deadlines for any and all future service steps ordered by the honourable court in relation to this application for injunctive relief to avoid any future repetition of such delayed compliance.
14. I thank the honourable Court for its attention in this matter.

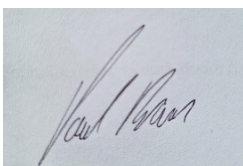
STATEMENT OF TRUTH

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

Full Name: PAUL STEVEN BROWN

Position: COMMUNICATIONS MANAGER

Name of Claimant: City of Wolverhampton Council

Signed 

Print Name PAUL BROWN

Dated: 9 May 2023

i) Statement of: Paul Brown
ii) Statement No: 10
iii) For: Claimants
iv) Dated: 9.5.2023
v) Exhibits: PB10A

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(ATTACHED)**

Defendants

EXHIBIT PB10A

This is the document referred to as "Exhibit PB10A in the witness statement of Paul Brown dated 9th May 2023.



West Midlands Police @WMPolice · 3h

West Midlands Police and the four Black Country councils will be appearing at the High Court next week to apply for an interim injunction to ban "street racing" across the Black Country region.



Wolves Council @WolvesCouncil · 4h

We, together with @dudleymbc, @sandwellcouncil, @WalsallCouncil & @WMPolice are applying for an interim High Court injunction to ban #streetracing #carmacruising in the Black Country, which will be heard next week. Full story: orlo.uk/7fiEe (1/4)

[Show this thread](#)



3

8

9



West Midlands Police Retweeted



Wolves Council @WolvesCouncil · Jan 26

We, together with @dudleymbc, @sandwellcouncil & @WalsallCouncil, will appear before the High Court on Monday 6 February, 2023, seeking an extension to the injunction banning 'street racing' in the Black Country. Full story: orlo.uk/1UzQY (1/5)



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5

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1,977



Both West Midlands Police Twitter



Both West Midlands Police Facebook

Wolverhampton Police Retweeted



Wolves Council @WolvesCouncil · 4h

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Wolverhampton Police Retweeted



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2 5 6 2,004





All Wolverhampton Police Twitter







Wolverhampton Police

14 February at 16:34 · 🌐

...

We're proud to continue our support.







Wolverhampton Today


Published by Orlo · 14 February at 15:19 · 🌐


The High Court has continued the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country.
It prohibits people from parti... See more


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Wolverhampton Police

3 d · 🌐

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Wolverhampton Today


Published by Orlo · 5 d · 🌐


A date has now been confirmed for the next High Court street racing hearing. It will take place on Monday 15 May at 10.30am at the Birmingham District Registry,... See more

 4

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Sandwell Police Retweeted
West Midlands Police @WMPolice · 3h
West Midlands Police and the four Black Country councils will be appearing at the High Court next week to apply for an interim injunction to ban "street racing" across the Black Country region.

Wolves Council @WolvesCouncil · 4h
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[Show this thread](#)



3 8 9

Sandwell Police Retweeted
Wolves Council @WolvesCouncil · Jan 26
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3 8 7 2,431








All Sandwell Police Twitter

Sandwell Police
4 h · 🌐

West Midlands Police and the four Black Country councils will be appearing at the High Court next week to apply for an interim injunction to ban "street racing" across the region.



**STREET RACERS
NOT WELCOME
IN THE BLACK COUNTRY**


    


Wolverhampton Today
Published by Orlo · 4 h · 🌐

The four Black Country councils and West Midlands Police will be at the High Court next week to seek an interim injunction to ban "street racing" in the region.... [See more](#)

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 Write a comment... 🗨️ 😊 📷 🔄

 **Girish Patel**
You can ban things and make them illegal but the major problem is policing them.
So many illegal things just get ignored it's unbelievable! Car behind me was very

Sandwell Police
14m · 🌐

We're proud to be supporting @WolvesCouncil, @dudleymbc, @sandwellcouncil and @WalsallCouncil at a High Court hearing on Monday 6 February, 2023, seeking an extension to the injunction banning 'street racing' in the Black Country.



**STREET RACING
BANNED
IN THE BLACK COUNTRY**

Wolverhampton Today
Published by Orlo · Yesterday at 12:11 · 🌐

The four Black Country councils and West Midlands Police will appear before the High Court next month to seek an extension to the injunction banning 'street rac... [See more](#)

👍 2



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Walsall Police Retweeted

Walsall Council @WalsallCouncil · 4h

Read the full thread below

For more information, visit our newsroom: bit.ly/3uU26X8



Wolves Council @WolvesCouncil · 4h

We, together with @dudleymbc, @sandwellcouncil, @WalsallCouncil & @WMPolice are applying for an interim High Court injunction to ban #streetracing #carruising in the Black Country, which will be heard next week. Full story: orlo.uk/7fIEe (1/4)

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Walsall Council



1



1



Walsall Police Retweeted



Wolves Council @WolvesCouncil · Jan 26

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3



8



7



2,467



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Walsall Police @WalsallPolice · 17h
We're proud to continue our support.

Wolves Council @WolvesCouncil · 18h

The High Court has continued the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country. Full story: orlo.uk/tpDMg (1/4) @dudleymbc @WalsallCouncil @sandwellcouncil @dudleymbc

[Show this thread](#)



1,006

Walsall Police Retweeted



Wolves Council @WolvesCouncil · Feb 18

A date has now been confirmed for the next High Court street racing hearing. It will take place on Monday 15 May at 10.30am at the Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham, B4 6DS. Full story: orlo.uk/fEzMJ



3,539

All Walsall Police Twitter

Walsall Police
4 h · 🌐

West Midlands Police and the four Black Country councils will be appearing at the High Court next week to apply for an interim injunction to ban "street racing" across the region.



 **Sandwell**
Metropolitan Borough Council

 **Dudley**
Metropolitan Borough Council

 **Walsall Council**

 **CITY OF WOLVERHAMPTON COUNCIL**

Wolverhampton Today
Published by Orlo · 4 h · 🌐

The four Black Country councils and West Midlands Police will be at the High Court next week to seek an interim injunction to ban "street racing" in the region.... [See more](#)

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Maggie Jennings
About time

Like Reply 3 h

Walsall Police
11m · 🌐

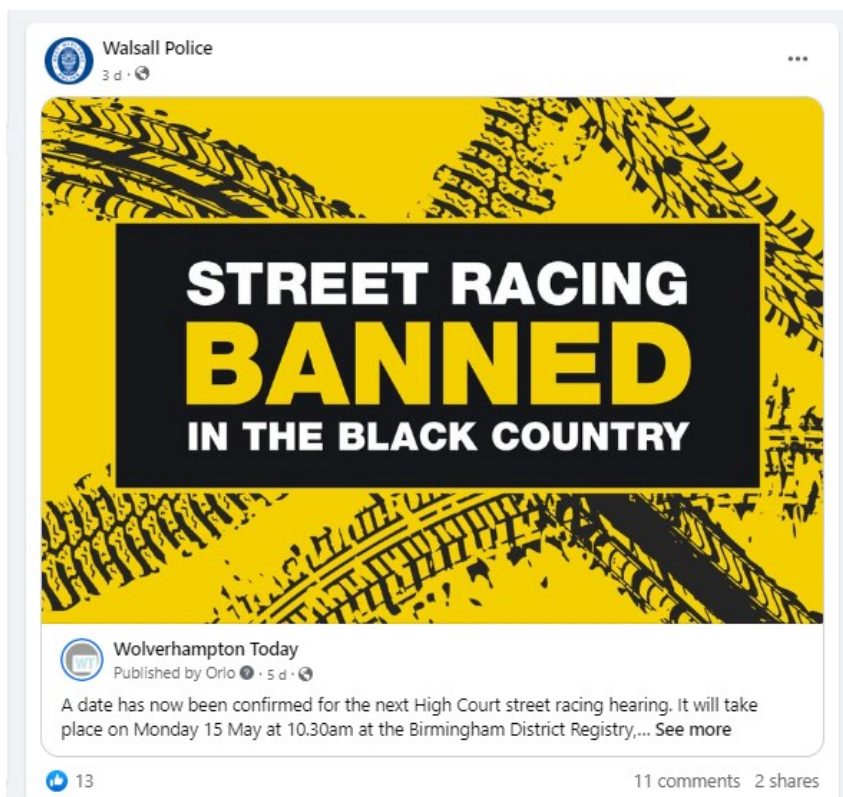
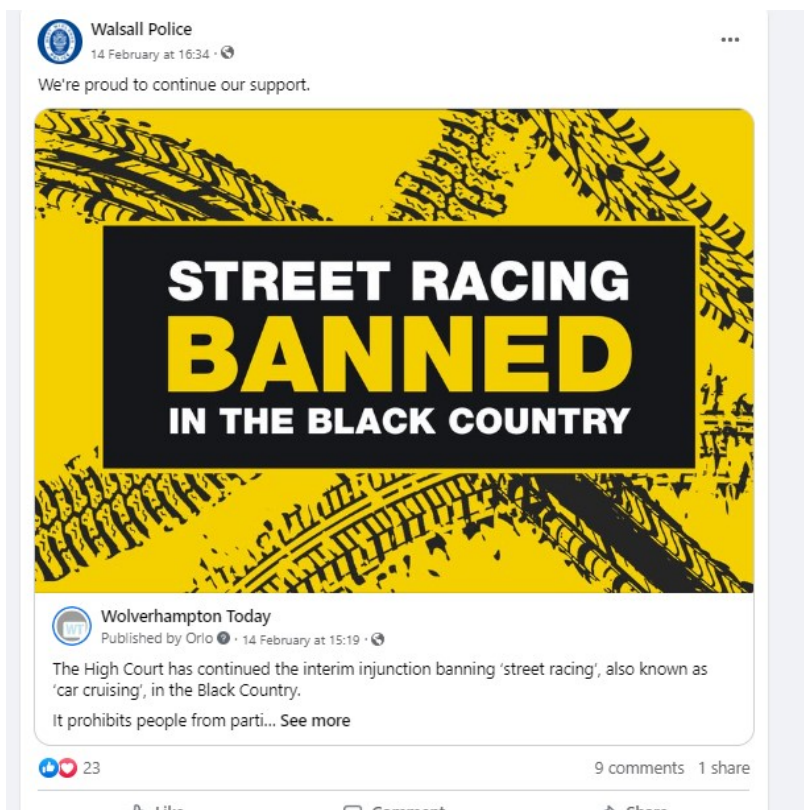
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Wolverhampton Today
Published by Orlo · Yesterday at 12:11 · 🌐

The four Black Country councils and West Midlands Police will appear before the High Court next month to seek an extension to the injunction banning 'street rac... [See more](#)

3



All Walsall Police Facebook





All Dudley Police Twitter



Dudley Police

4h · 🌐

...

West Midlands Police and the four Black Country councils will be appearing at the High Court next week to apply for an interim injunction to ban "street racing" across the region.



Wolverhampton Today

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The four Black Country councils and West Midlands Police will be at the High Court next week to seek an interim injunction to ban "street racing" in the region.... [See more](#)

50

10 comments 5 shares

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Comment

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Write a comment...



Ssam J Wilkes

Let's hope it is banned, 2 young lives lost a couple of weeks ago and others are still in hospital because of Street Racing. It's fine to race cars in a legal and controlled environment, not on the streets where lives are endangered.



Dudley Police

7m · 🌐

...

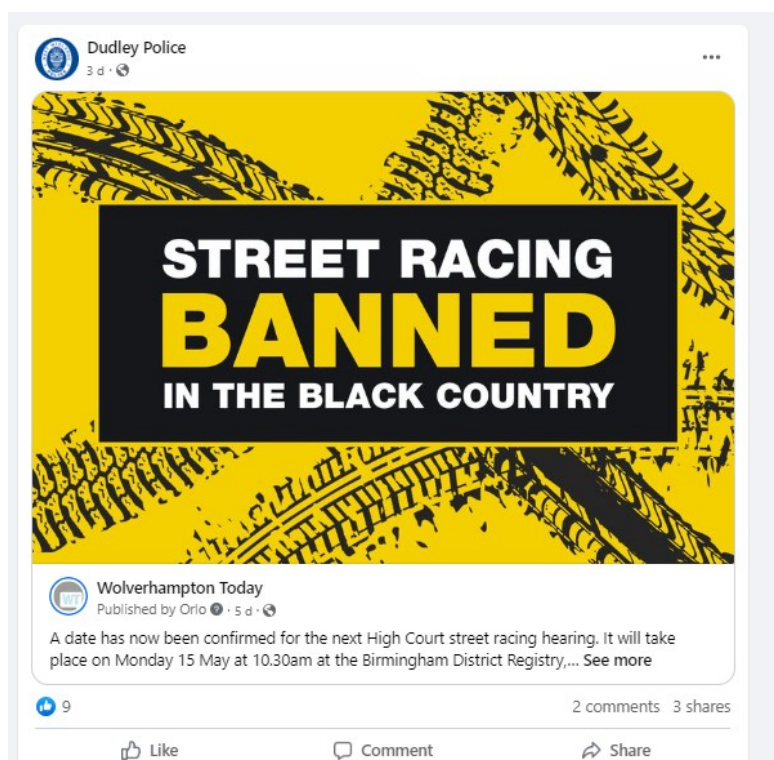
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Wolverhampton Today

Published by Orlo · Yesterday at 12:11 · 🌐

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All Dudley Police Facebook

Birmingham

The details of the Birmingham order can be found on the [Birmingham City Council website](#).

Wolverhampton

The details of the Black Country order can be found on the [Wolverhampton City Council website](#).

Step 2: Investigation

Across the West Midlands we are working with local councils to use injunctions to ban car cruising.

West Midlands Police website

An interim injunction banning 'street racing', also known as 'car cruising', is in force in the Black Country.

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

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

"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

"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

"Drifting" – turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input

"Undertaking" – Passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code.

The Injunction has a Power of Arrest attached to it which gives the police the power to arrest anyone who breaches it.

Breach of an injunction is a contempt to court and if proved the court has the power to impose a sentence of imprisonment, a fine, or an order seizing a person's assets.

The Black Country Area includes all of the Boroughs of Wolverhampton, Dudley, Sandwell and Walsall.

Full details of the interim injunction, including evidence presented to the High Court, the Sealed



YOU MAY ALSO LIKE

Street racing injunction review hearing next month >

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-  [Power of Arrest](#)
-  [Sealed Orders Wolverhampton City Council and Others v Unknown](#)
-  [Order of the High Court of Justice 14 December 2022](#)
-  [Supplementary Evidence Bundle](#)
-  [WN Injunction Application \(the Urgent Interim Relief Application\)](#)
-  [Main Application Bundle](#)
-  [Notice of High Court Hearing - 6 February 2023](#)
-  [Bundle for 6 Feb 2023 Car Cruising Hearing - Part 1](#)
-  [Bundle for 6 Feb 2023 Car Cruising Hearing - Part 2](#)
-  [Bundle for 6 Feb 2023 Car Cruising](#)

City of Wolverhampton Council street racing page accessed via link from West Midlands Police website above.

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iv) Dated: 17.5.2023
v) Exhibits: PB11A

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(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

ELEVENTH WITNESS STATEMENT OF PAUL STEVEN BROWN

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

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief. This is my third statement in these proceedings.
2. The City of Wolverhampton Council is the authority which is leading the joint application of the Councils of Wolverhampton, Dudley, Sandwell and Walsall (hereinafter referred to as the “Black Country Boroughs”) seeking injunctive relief to restrain street racing (also referred to as car cruising) in the Black Country Boroughs.
3. I have been employed since 25 June 2007 as a Senior Communications Adviser and latterly Communications Manager in the communications team of the City of Wolverhampton Council.
4. In collaboration with my colleagues Pardip Nagra (ASB Team Leader) and Adam Sheen (Senior Solicitor, Legal Services) a communications plan has been developed, with the initial steps implemented, initially to raise awareness of the application to the High Court for an interim street racing injunction for the Black Country Area and, should the court be minded to grant this, to promote the existence of the injunction, and the power of arrest, once it is formally in place.
5. Recognising this is a joint enterprise, I have been liaising closely with my counterparts in the communications teams of Dudley, Sandwell and Walsall Councils and West Midlands Police. This is my 11th statement within these proceedings.
6. I make this statement to update the Court on the measures taken to notify people of the vacation of the review hearing of 15 May 2023 and its relisting for 19 May 2023.
7. The Claimants were notified that the hearing of 15 May had been vacated at around 3.00 p.m. on 12 May 2023.

8. A media release was issued early evening on 12 May 2023 to publicise the new date issued to relevant print publications including the Express and Star, Chronicle Week, the Birmingham Mail, Halesowen & Dudley News and Stourbridge News; local radio stations including BBC WM, Free Radio, Signal 107, WCR FM and Heart; the website Birmingham Live (aka) BLive; and TV stations BBC Midlands Today and ITV Central. Please see **“ExhibitPB10A” attached hereto which refers** and also includes coverage in the Express & Star, as well as screengrabs of the news items on each Claimant’s website, where the news story was also posted.
9. The street racing pages of the Claimants’ websites were updated on 12 May 2023 with the new notice of hearing and the new hearing date.

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

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

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

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

Please see **“ExhibitPB11A” attached hereto which refers** and also includes screengrabs from each of the above webpages.

10. Information about the change of hearing date was shared on social media by all four claimants between 12 May 2023 and 15 May 2023. Please see **“ExhibitPB11A” attached hereto which refers** and also includes screengrabs from the social media channels of the four claimants.
11. Further, a request was made to West Midlands Police on 12 May to share information via its social media channels. This was complied with – please see **“ExhibitPB11A” attached hereto which refers** and includes screengrabs from the social media channels of West Midlands Police, Wolverhampton Police, Walsall Police, Sandwell Police and Dudley Police.
12. The Court may wish to know that social media issued by the City of Wolverhampton Council via Facebook, Twitter and Instagram reached an audience in excess of 93,000 people from 12 May onwards. Please see **“Exhibit**

PB11A” attached hereto which refers and includes a graph showing a noticeable spike in the reach of posts relating to street racing on the council's social media feeds between these dates.

13. The new notice of hearing was printed and placed in the existing bundle of documents relating to the review hearing and injunction which are maintained at the front desks of the offices of the four claimants for public inspection.

14. For the above reasons stated reasons, I believe that notice of the change in date of the review hearing from 15 May 2023 to 19 May 2023 has been brought to the attention of the public at large, and in particular, those likely to be affected by this application, or those engaging, looking to engage, or likely to engage, in the behaviour prohibited by this application and the interim injunction if granted.

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

STATEMENT OF TRUTH

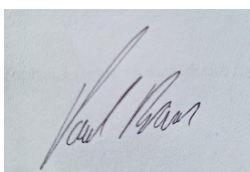
I believe that the facts stated in this Witness Statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth

Full Name: PAUL STEVEN BROWN

Position: COMMUNICATIONS MANAGER

Name of Claimant: City of Wolverhampton Council

Signed

A rectangular box containing a handwritten signature in dark ink. The signature appears to be 'Paul Brown' written in a cursive, flowing style.

Print Name PAUL BROWN

Dated: 17 May 2023

i) Statement of: Paul Brown
ii) Statement No: 11
iii) For: Claimants
iv) Dated: 17.5.2023
v) Exhibits: PB11A

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

CLAIM NO: KB-2022-BHM000188

B E T W E E N:

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

Claimants

and

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

Defendants

EXHIBIT PB11A

This is the document referred to as "Exhibit PB11A in the witness statement of Paul Brown dated 17th May 2023.

Change of date for street racing injunction review hearing

Released: Friday 12 May, 2023



A new date has been set for a review hearing to consider whether the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country should remain in force or be amended.

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

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

The interim injunction, which is served against 'persons unknown', was initially granted in December and reviewed and continued in February.

A further review hearing was due to take place on Monday (15 May, 2023) but has been rearranged and will now take place at Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham, B4 6DS on Friday 19 May, 2023, at 10.30am.

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

For more information, including details of full terms of the interim injunction and evidence in support of the application, please visit the street racing injunction pages of the applicants: www.wolverhampton.gov.uk/street-racing-injunction, https://go.walsall.gov.uk/black_country_car_cruising_injunction, www.sandwell.gov.uk/streetracing, or www.dudley.gov.uk/car-cruising-injunction.

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

ENDS

City of Wolverhampton Council media release

A new date has been set for a review hearing to consider whether the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country should remain in force or be amended.

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

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For more information, including details of full terms of the interim injunction and evidence in support of the application, please visit the street racing injunction pages of the applicants: [High Court grants order banning street racing in the Black Country](#), [Black Country street racing injunction](#), [Street racing](#), or [Car cruising injunction](#).

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



Change of date for street racing injunction review hearing

SHARE



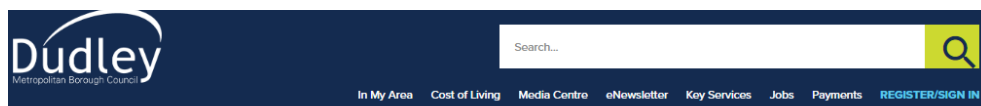
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12 May 2023

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Change of date for street racing injunction review hearing

Posted on: 15/05/2023



Share

A new date has been set for a review hearing to consider whether the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country should remain in force or be amended.

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

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

Dudley Council news page

Change of date for street racing injunction review hearing

Published 12th May 2023



A new date has been set for a review hearing to consider whether the interim injunction banning street racing, also known as 'car cruising', in the Black Country should remain in force or be amended.

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

Sandwell Council news page

New date set for street racing injunction review hearing

Published on 15 May 2023

[Print](#)

A new date has been set for a review hearing to consider whether the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country should remain in force or be amended.



Black Country Street Racing

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

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

Walsall Council news page

News

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New date for hearing about continuing Black Country street racing injunction

By [Adam Smith](#) | [Wolverhampton](#) | [Crime](#) | Published: May 12, 2023

C

A new date has been set for a review hearing to decide if interim injunction banning street racing in the Black Country should remain in force or be amended.

Express and Star 12 May 2023



Wolves Council
@WolvesCouncil

...

The date of the review hearing to consider if interim injunction banning street racing, aka car cruising, in the Black Country should stay in force or be amended has been changed. Full story orlo.uk/3sSup
[@dudleymbc](#) [@sandwellcouncil](#) [@WalsallCouncil](#) [@WMPolice](#) (1/3)



4:48 PM · May 12, 2023 · 14.1K Views



Wolves Council
@WolvesCouncil

...

ICYMI: The date of the review hearing to consider if the interim injunction banning street racing in the Black Country should remain in force or be amended has been moved to Friday (19th). Full story orlo.uk/3j5zY
[@dudleymbc](#) [@sandwellcouncil](#) [@WalsallCouncil](#) [@WMPolice](#)



9:54 AM · May 15, 2023 · 134 Views

City of Wolverhampton Council Twitter



Wolverhampton Today

Published by Orlo · 2 d ·

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The date of the review hearing to consider whether the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country should remain in force or be amended has been changed.

It will now take place Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham, B4 6DS on Friday 19 May at 10.30am. Full story 🙌

<https://www.wolverhampton.gov.uk/.../change-date-street...>

For more in... See more



Wolverhampton Today

Published by Orlo · 49 m ·

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ICYMI: The date of the review hearing to consider if the interim injunction banning street racing, aka car cruising, in the Black Country should remain in force or be amended has moved to this Friday (19th May).

It will take place Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham, B4 6DS at 10.30am. Full story 🙌


<https://www.wolverhampton.gov.uk/.../change-date-street...>




STREET RACING

City of Wolverhampton Council Facebook



wolverhampton_today







wolverhampton_today The date of the review hearing to consider whether the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country should remain in force or be amended has been changed.

It will now take place Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham, B4 6DS on Friday 19 May at 10.30am. See the council website, <https://orlo.uk/YQDcf>, for the full story.


2d

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Walsall Council Facebook



Dudley Council Twitter



Dudley borough

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Wolverhampton Today

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Dudley Council Facebook



Sandwell

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Wolverhampton Today

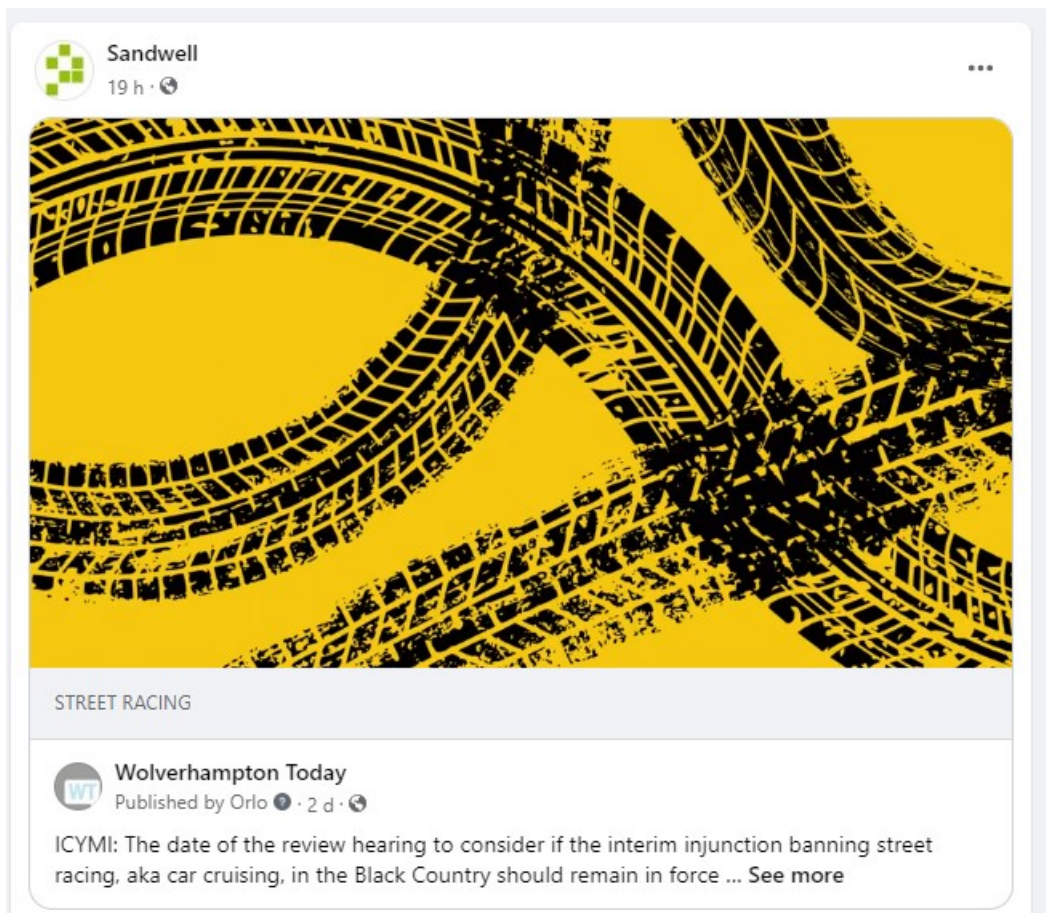
Published by Orlo · 12 May at 16:47 · 🌐

The date of the review hearing to consider whether the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country should rema... See more



6

11 comments · 2 shares



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Sandwell Council Twitter



Sandwell Council Instagram



West Midlands Police Twitter



West Midlands Police Facebook

Dudley Police Retweeted
Wolves Council @WolvesCouncil · May 12
The date of the review hearing to consider if interim injunction banning street racing, aka car cruising, in the Black Country should stay in force or be amended has been changed. Full story [@orlo.uk/3sSup](https://orlo.uk/3sSup) @dudleymbc @sandwellcouncil @WalsallCouncil @WMPolice (1/3)



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Dudley Police Twitter

 Dudley Police
2 d ·



 **Wolverhampton Today**
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The date of the review hearing to consider whether the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country should rema... [See more](#)

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Wolverhampton Today

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The date of the review hearing to consider whether the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country should rema... [See more](#)

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Wolverhampton Today

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The date of the review hearing to consider whether the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country should rema... [See more](#)

Sandwell Police Facebook



Wolverhampton Police Twitter



Wolverhampton Police Facebook

High Court grants order banning street racing in the Black Country

An interim injunction banning 'street racing', also known as 'car cruising', is in force in the Black Country.

The Review hearing will now take place Friday 19 May 2023 at 10.30 at the High Court, Birmingham District Registry.

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

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



City of Wolverhampton Council street racing page

Car cruising injunction

Share [f](#) [t](#) [p](#) [e](#)

An interim injunction banning 'street racing', also known as 'car cruising', is in force in the Black Country.

The Review hearing will now take place Friday 19 May 2023 at 10:30 am at the High Court, Birmingham District Registry.

For more information [view the Notice of Hearing](#).

Dudley Council street racing page



There will be a further hearing to take place in May to consider whether the interim injunction should remain in force or be amended. This will be held on Friday 19 May 2023 at 10.30am at the Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham, B4 6DS. Further details of this hearing will be published once confirmed.

At that hearing the Black Country councils will seek to extend the terms of the Injunction so that it:

- Forbids people from participating between the hours of 3pm and 7am in a gathering of two

Sandwell Council street racing page

Black Country street racing injunction

Change of hearing date: The Review Hearing scheduled for Monday 15 May~~x~~ will now take place on Friday 19 May 2023 at 10.30am at the High Court, Birmingham District Registry.

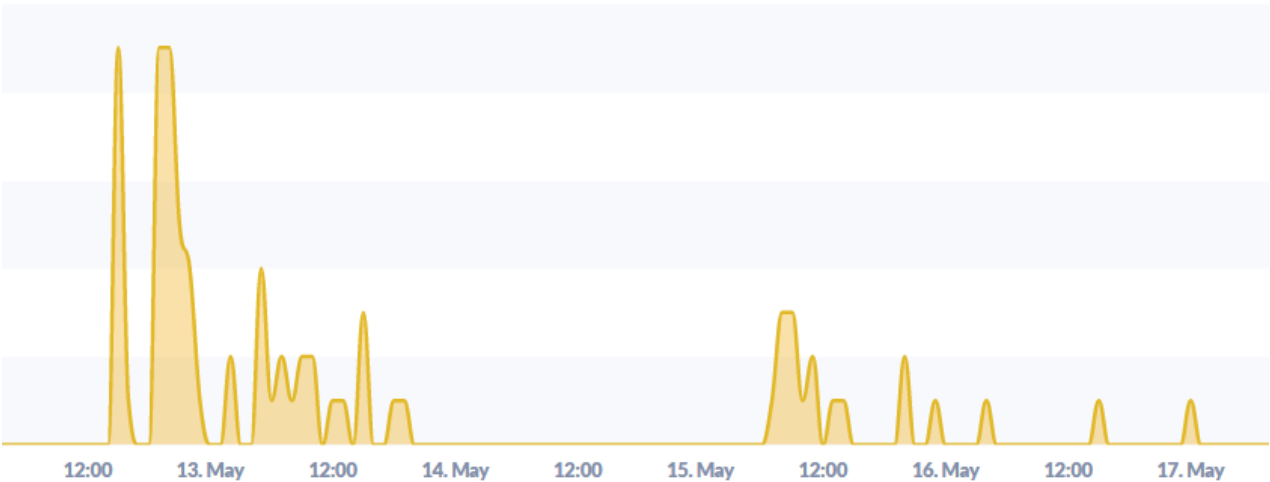
Overview

An interim injunction banning street racing (also known as car cruising) is in force in the Black Country.

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



Walsall Council street racing page



Street racing social media analytics

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

CLAIM NO: KB-2022-BHM-000188

B E T W E E N:

**WOLVERHAMPTON CITY COUNCIL
DUDLEY METROPOLITAN BOROUGH COUNCIL
SANDWELL METROPOLITAN BOROUGH COUNCIL
WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

**PERSONS UNKNOWN
(as described in the particulars of claim dated 7 October 2022 as subsequently amended)**

Defendants

NOTICE OF MOVING – 12th and 13th WITNESS STATEMENT OF PAUL BROWN

Please note the Twelfth and Thirteenth Witness Statements of Paul Steven Brown dated 16 June 2023 have been moved to Volume Two of the bundle of documents for use at the hearing on 27 February 2024.

Whilst originally, the aforementioned twelfth and thirteenth witness statements of Mr Brown appeared within the bundle of documents before the court for the review hearing on 04 October 2023 at this point of the bundle, the statements have been removed from this particular volume of the bundle of documents for the hearing on 27 February 2024 to avoid unnecessary duplication.

i) Statement of: Paul Brown
ii) Statement No: 14
iii) For: Claimants
iv) Dated: 22.9.2023
v) Exhibits: PB14A – PB14C

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2022-BHM000188

B E T W E E N:

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

Claimants

and

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

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

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

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

Defendants

FOURTEENTH WITNESS STATEMENT OF PAUL STEVEN BROWN

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

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief. This is my 14th statement in these proceedings.
2. The City of Wolverhampton Council is the authority which is leading the joint application of the Councils of Wolverhampton, Dudley, Sandwell and Walsall (hereinafter referred to as the "Black Country Boroughs") seeking injunctive relief to restrain street racing (also referred to as car cruising) in the Black Country Boroughs.
3. I have been employed since 25 June 2007 as a Senior Communications Adviser and latterly Communications Manager in the communications team of the City of Wolverhampton Council.
4. In collaboration with my colleagues Pardip Nagra (ASB Team Leader) and Adam Sheen (Senior Solicitor, Legal Services) a communications plan has been developed, with the initial steps implemented, initially to raise awareness of the application to the High Court for an interim street racing injunction for the Black Country Area and, should the court be minded to grant this, to promote the existence of the injunction, and the power of arrest, once it is formally in place.
5. Recognising this is a joint enterprise, I have been liaising closely with my counterparts in the communications teams of Dudley, Sandwell and Walsall Councils and West Midlands Police.
6. The order of the High Court made by the Honourable Mr Justice Ritchie on 19 May 2023 required the Claimants to take a series of publicity steps publicising the outcome of the hearing to bring notice of the hearing to the attention of "Persons Unknown".

7. The information below details these steps and how, I respectfully suggest, the Claimant Councils have fulfilled these steps.
8. Issuing a media release highlighting the continuation of the Injunction and Power of Arrest

Such release must provide:

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

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

by 23:59 on 26 May 2023.

I can confirm that the media release was issued to the above outlets on 23 May 2023. Please see "City of Wolverhampton Council media release – interim injunction granted" within **"Exhibit PB14A" attached hereto** which refers and also includes screengrabs of the news items on Claimants' websites ("News release on City of Wolverhampton Council website – interim injunction granted", "News release on Sandwell

Council website – interim injunction granted", "News release on Walsall Council website – interim injunction granted" & "News release on Dudley Council website – interim injunction granted"), and coverage in the Birmingham Mail/Birmingham Live ("Birmingham Live, 24 May 2023") and Express & Star ("Express & Star, 25 May 2023"). The news was also featured on BBC WM, Dudley News, Free Radio and in the Local Government Lawyer.

The court may wish to know that a subsequent media release, focused on the punishments that people could face if they were to breach the interim injunction, "Street racers could face jail for breaching court injunction", was issued on Tuesday 6 June, 2023, and was shared in the same way as the above. A copy of the media release of 6 June 2023 appears attached hereto marked "**Exhibit PB14B**" ("City of Wolverhampton Council media release – 6 June") for the sake of completeness.

Upon confirmation of a review hearing date set for November 2023, a further media release was issued on was issued to the above outlets on 24 July 2023. Please see "City of Wolverhampton Council media release – review hearing date November" within "**Exhibit PB14A**" **attached hereto** which refers. This was also published on the claimants' websites and social media, and publicised by the local media.

Following a change to the date of the review hearing to 4 October 2023 due the court's earlier availability, a third media release was issued to the above outlets on 10 August, 2023. Please see "City of Wolverhampton Council media release – review hearing date October" within "**Exhibit PB14A**" **attached hereto** which refers and also includes screengrabs of the news items on Claimants' websites ("News release on City of Wolverhampton Council website – review hearing date October ", "News release on Sandwell Council website – review hearing date October ", "News release on Walsall Council website – review hearing date October " & "News release on Dudley Council website – review hearing date October "), and coverage in the Express & Star

Commented [AS1]: This release from 6 June should be exhibited.

Commented [PB2R1]:

("Express & Star, 10 August 2023"). The news was also featured on BBC WM, Free Radio and Midlands Today.

9. Placing on the Claimants' social media including Twitter, Facebook and Instagram links to the above media release regarding the granting of the High Court injunction and power of arrest and highlighting introduction of injunction and power of arrest by 26 May 2023.

I can confirm that the Claimants shared social media relating to the above media release on 23 May 2023. Please see "City of Wolverhampton Council social media – interim injunction granted", "Sandwell Council social media – interim injunction granted", "Walsall Council social media – interim injunction granted" & "Dudley Council social media – interim injunction granted" within "**Exhibit PB14A**" **attached hereto** which refers and contains screengrabs of examples of the social media.

Social media relating to the confirmation of the review hearing for November and subsequently October was also shared by all parties. Please see **Exhibit PB14A attached hereto** which refers and which, for ease of reference, contains social media relating to the confirmation of the review hearing for October only (City of Wolverhampton Council social media – October hearing", "Sandwell Council social media – October hearing", "Walsall Council social media – October hearing " & "Dudley Council social media – October hearing". Please note, Walsall Council and Dudley Council shared the above information on Instagram but as 'stories' and so screengrabs are not available.

The court may wish to know that a further media release and social media about the October hearing is scheduled to be published week commencing 25 September, 2023.

The court may also wish to know that other social media posts have been issued over recent months, including relating to the media release of 6 June, 2023 and regular reminders of the existence of the interim injunction and signposting to the dedicated page on the website of the

City of Wolverhampton Council. These, along with the posts about the original November hearing date, can be made available should the court wish to see them.

10. Updating the dedicated pages on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council and Walsall Council about the Injunction and Power of Arrest and this Order:

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

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

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

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

Such pages shall carry a direct link to the Injunction Order, the Power of Arrest, the Order of Freeman J, this Order, the Documents and the Evidence and be updated by 23:59 on 26 May 2023.

I can confirm the webpages have been updated as required. Please see "City of Wolverhampton Council street racing injunction page", "Sandwell Council street racing injunction page", "Walsall Council street racing injunction page" & "Dudley Council street racing injunction page" within **"Exhibit PB14A" attached hereto** which refers and contains screengrabs of the webpages. Please note, these pages have subsequently been updated with information about the October review hearing upon confirmation of the review hearing date, and the screengrabs presented in **"Exhibit PB14A" attached hereto** reflect this.

11. Ensuring that the home (or landing) page of each of the Claimants' main websites have and retain a prominent direct link to the dedicated webpages referred to above by 23:59 on 26 May 2023.

I can confirm that Claimants' main websites have and retain a prominent direct link to the dedicated street racing injunction webpages. Please see

"City of Wolverhampton Council homepage", "Dudley Council homepage", "Walsall Council homepage" & "Sandwell Council homepage" within **"Exhibit PB14A" attached hereto** which refers and contains screengrabs of examples of the webpages.

12. Ensuring that copies of the Injunction, the Power of Arrest and this Order are available at the front desks of the Claimants' main offices by 23:59 on 26 May 2023.

I can confirm that copies of the Injunction, the Power of Arrest and this Order have been made available at the front desks of the Claimants' main offices as required.

13. Ensuring that the video previously uploaded to the video sharing website "YouTube" and the Claimants' websites and social media pages (including Instagram, Twitter and Facebook), now states that this Order has been made and the Injunction and Power of Arrest continue in force.

This may be done by uploading a fresh video (which must contain all the matters previously ordered by Hill J) or prominently adding text to the existing video (or the description of the existing video on any website or social media page) stating "Following a hearing on 19 May 2023 The Injunction and Power of Arrest continue in force: The video and/or addition of text shall be uploaded or the text added by 23:59 on 26 May 2023.

I can confirm that a new video was produced and uploaded to the City of Wolverhampton Council's YouTube channel at <https://youtu.be/hVPjkdhplwY> on 24 May 2023. It has also been shared via the Claimants' social media channels and added to the respective street racing injunction webpages. Please see "City of Wolverhampton Council YouTube - video", "City of Wolverhampton Council social media – video", "Dudley Council social media – video", "Sandwell Council social media – video" & "Walsall Council social media – video" within **"Exhibit PB14A" attached hereto** which refers and contains screengrabs of the video and social media.

14. Requesting that West Midlands Police post on their website and Instagram, Twitter, and Facebook accounts, a link to the media release. Such request to be made by 23:59 on 26 May 2023.

I can confirm that a request was made on 23 May 2023 and complied with. Please see "West Midlands Police social media – interim injunction granted", "Wolverhampton Police social media – interim injunction granted", "Sandwell Police social media – interim injunction granted", "Walsall Police social media – interim injunction granted" & "Dudley Police social media – interim injunction granted" within **“Exhibit PB14A” attached hereto** which refers and contains screengrabs of examples of the social media. Please also see "Confirmation of West Midlands Police activity – interim injunction granted" **within “Exhibit PB14A” attached hereto.**

The court may wish to know that, in support of our communications plan, West Midlands Police has shared a further series of posts relating to the street racing injunction and these can be seen in **“Exhibit PB14C” attached hereto** (“Additional West Midlands Police social media posts”).

15. Continuing to cause to be displayed at regular intervals on the Claimants’ electronic road signage the words “NEW HIGH COURT INJUNCTION PROHIBITING CAR CRUISING AND STREET RACING IN FORCE IN THIS AREA”; or words to the same effect and thereafter

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

I can confirm that the signage continues to be displayed, both at fixed locations and at regular intervals on digital signage, as described above, throughout the Black Country Area.

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

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

STATEMENT OF TRUTH

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

Full Name: PAUL STEVEN BROWN

Position: COMMUNICATIONS MANAGER

Name of Claimant: City of Wolverhampton Council

Signed



Print Name PAUL BROWN

Dated: 22 September 2023

EXHIBIT PB14A

Statement of: Paul Brown
Statement no: 14
Statement for: Claimants
Exhibits: PB14A-14C
Dated: 22.09.2023

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

CLAIM NO: KB-2022-BHM-000188

B E T W E E N:

- (1) **Wolverhampton City Council**
- (2) **Dudley Metropolitan Borough Council**
- (3) **Sandwell Metropolitan Borough Council**
- (4) **Walsall Metropolitan Borough Council**

Claimants

and

- 1. Persons Unknown who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving**
- 2 Persons Unknown who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving**
- 3. Persons Unknown promoting organising publicising (by any means whatsoever) any gathering between the hours of 3:00pm and 7:00am of 2 or more persons with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving within the Black Country Area shown on Plan A (attached)**
- 4. Persons Unknown being drivers, riders or passengers in or on motor vehicle(s) who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) at which they engage in motor racing or motor stunts or other dangerous or obstructive driving**

Defendants

EXHIBIT PB14A

This is the document marked "Exhibit PB14A" and referred to in the witness statement of Paul Brown dated 22 September 2023.

High Court continues interim Black Country street racing ban

Released: Tuesday 23 May, 2023



The interim injunction banning 'street racing', also known as 'car cruising', in the Black Country has been extended by the High Court, with minor alterations, at a hearing on Friday (19 May, 2023).

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

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

The interim injunction and power of arrest were initially granted by the Honourable Mrs Justice Hill in December, continued by the Honourable Mr Justice Freedman in February and reviewed and continued by The Honourable Mr Justice Ritchie at the High Court in Birmingham on Friday, with minor amendments to both the injunction and power of arrest.

The injunction remains interim at this stage, pending a judgment from the Supreme Court which is currently considering a similar injunction served against persons unknown, which may have a bearing on the Black Country case. In the meantime, there will be a further case management hearing later this year.

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

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Adults and Wellbeing, said: "We are pleased that the High Court has seen fit to continue the street racing injunction, which is certainly having an effect on preventing meets from occurring in our region.

"Street racing is noisy, dangerous and illegal and, as we have tragically seen in the last 12 months, can result in death or serious injuries among drivers, passengers and spectators. This interim injunction provides a very strong deterrent to anyone thinking of taking part in this anti-social activity."

For more information, including details of full terms of the interim injunction with minor amendments and evidence in support of the application, please visit the street racing injunction pages of the applicants:

www.wolverhampton.gov.uk/street-racing-injunction, https://go.walsall.gov.uk/black_country_car_cruising_injunction, www.sandwell.gov.uk/streetracing, or www.dudley.gov.uk/car-cruising-injunction.

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

ENDS

City of Wolverhampton Council media release – interim injunction granted

EXHIBIT PB14A

EXHIBIT PB14A

CITY OF
WOLVERHAMPTON
COUNCIL

OUR SERVICESA TO ZIN YOUR AREANEWSWORK FOR USMY ACCOUNT

High Court continues interim Black Country street racing ban

HOME / NEWS / HIGH COURT CONTINUES INTERIM
BLACK COUNTRY STREET RACING BAN

The High Court has continued the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country.

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

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


The interim injunction, which is served against 'persons unknown', was initially granted by The Honourable Mrs Justice Hill in December, and reviewed by The Honourable Mr Justice Freedman at the High Court in Birmingham yesterday (Monday 13 February, 2023).

Highlighting the need for such an injunction, The Honourable Mr Justice Freedman referenced an incident in Oldbury last autumn which caused 2 deaths and which was "linked unequivocally to car cruising", along with other incidents causing harm in Stevenage, Warrington and Scunthorpe involving fatalities and life changing injuries.

He permitted the original order to continue, with a further hearing to take place in May to consider whether the interim injunction should remain in force or be amended. This will be held on Monday 15 May 2023 at 10.30am at the Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham, B4 6DS.

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

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing, said: "Street racing, also sometimes described as car cruising, is noisy, dangerous and illegal and some events have resulted in serious injuries and even death, as we tragically saw last autumn in Oldbury.



The High Court has continued the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country

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LAST UPDATED

16 February 2023

News release on City of Wolverhampton Council website – interim injunction granted

High Court continues interim Black Country street racing ban

Published 24th May 2023



The interim injunction banning 'street racing', also known as 'car cruising', in the Black Country has been extended by the High Court, with minor alterations, at a hearing on Friday (19 May, 2023).

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

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

The interim injunction and power of arrest were initially granted by the Honourable Mrs Justice Hill in December 2022, continued by the Honourable Mr Justice Freedman in February 2023 and reviewed and continued by The Honourable Mr Justice Ritchie at the High Court in Birmingham on Friday (19 May 2023), with minor amendments to both the injunction and power of arrest.

The injunction remains interim at this stage, pending a judgment from the Supreme Court which is currently considering a similar injunction served against persons unknown, which may have a bearing on the Black Country case. In the meantime, there will be a further case management hearing later this year.

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

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News release on Sandwell Council website – interim injunction granted

people and communities

High Court continues interim Black Country street racing ban

Published on 24 May 2023

Print

The interim injunction banning 'street racing', also known as 'car cruising', in the Black Country has been extended by the High Court, with minor alterations, at a hearing on Friday 19 May 2023.

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

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

The interim injunction and power of arrest were initially granted by the Honourable Mrs Justice Hill in December, continued by the Honourable Mr Justice Freedman in February and reviewed and continued by The Honourable Mr Justice Ritchie at the High Court in Birmingham on Friday, with minor amendments to both the injunction and power of arrest.

The injunction remains interim at this stage, pending a judgment from the Supreme Court which is currently considering a similar injunction served against persons unknown, which may have a bearing on the Black Country case. In the meantime, there will be a further case management hearing later this year.

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

"We are pleased that the High Court has seen fit to continue the street racing ban."

News release on Walsall Council website – interim injunction granted

The High Court continues interim Black Country street racing ban

Posted on: 23/05/2023

#street racing #car cruising #injunction #road safety

Share



The interim injunction banning 'street racing', also known as 'car cruising', in the Black Country has been extended by the High Court, with minor alterations, at a hearing on Friday (19 May, 2023).

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

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

The interim injunction and power of arrest were initially granted by the Honourable Mrs Justice Hill in December, continued by the Honourable Mr Justice Freedman in February and reviewed and continued by The Honourable Mr Justice Ritchie at the High Court in Birmingham on Friday, with minor amendments to both the injunction and power of arrest.

The injunction remains interim at this stage, pending a judgment from the Supreme Court which is currently considering a similar injunction served against persons unknown, which may have a bearing on the Black Country case. In the meantime, there will be a further case management hearing later this year.

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

For more information, including details of full terms of the interim injunction with minor amendments and evidence in support of the application, please visit the street racing injunction pages of the applicants: www.wolverhampton.gov.uk/street-racing-injunction, <https://go.walsall.gov.uk/black-country-car-cruising-injunction>, www.sandwell.gov.uk/street-racing, or www.dudley.gov.uk/car-cruising-injunction.

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

News release on Dudley Council website – interim injunction granted

B Black Country • Crime

Time to rid our roads of dangerous street racers for good, says MP, after latest action

Nicola Richards MP has welcomed the temporary measure but says more is needed to tackle street racing

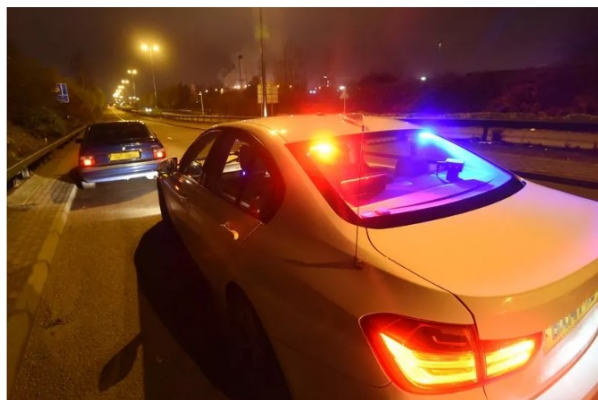
BLACK COUNTRY By Jamie Brassington

14:33, 24 MAY 2023

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Comments



Police crackdown on boy racers in Operation Hercules

A Black Country MP has welcomed an interim car cruising ban to tackle "dangerous" street racing on the region's streets. The interim measure was approved by the High Court last Friday, May 19, banning people from racing or carrying out stunts in [Dudley](#), Sandwell, [Walsall](#) and Wolverhampton.

The interim measure was first made in December, and then extended in February, before it was re-extended last week. It comes after Ben Corfield, 19 and Liberty Charris, 16, were [killed at an alleged car meet](#) in Oldbury in November. And it also follows a BirminghamLive investigation which revealed how highly reckless and dangerous driving by street racers are being [openly advertised on social media](#).

Welcoming the interim measure, Ms Richards who represents West Bromwich East said: "I'm pleased to see that the injunction against car cruising in the Black Country has been extended. Racing on our streets is dangerous and it has tragically cost people their lives.

"The injunction gives police the power to arrest people taking part anywhere in the Black Country, a power they would not otherwise have. Whilst it is an important short-term measure, it has to be part of a wide-ranging operation to drive this dangerous activity off our streets.

"I'll be working with the police and pushing local councils to do even more to tackle this dangerous behaviour on our roads." Wolverhampton Council said the injunction "prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving".


The interim injunction will be in place until the next hearing is made, but there has been no date set at the moment. Wolverhampton said the injunction "remains interim at this stage, pending a judgment from the Supreme Court which is currently considering a similar injunction served against persons unknown, which may have a bearing on the Black Country case".

Councillor Jasbir Jaspal, Wolverhampton Council's cabinet member for adults and wellbeing, added: "We are pleased that the High Court has seen fit to continue the street racing injunction, which is certainly having an effect on preventing meets from occurring in our region. Street racing is noisy, dangerous and illegal and, as we have tragically seen in the last 12 months, can result in death or serious injuries among drivers, passengers and spectators.

"This interim injunction provides a very strong deterrent to anyone thinking of taking part in this antisocial activity."

Birmingham Live, 24 May 2023: <https://www.birminghammail.co.uk/black-country/time-rid-roads-dangerous-street-26979920>

Tougher measures needed to tackle 'dangerous' car cruising, says West Bromwich MP

By Peter Madeley | West Bromwich | Politics | Published: 10 hours ago |  2 Comments

An MP has called for tougher measures to tackle car cruising on the roads of the Black Country.

Nicola Richards welcomed the extension of an interim street racing injunction, which was approved by the High Court and covers Dudley, Sandwell, Walsall and Wolverhampton.

It means anyone participating as a driver, a rider or a passenger, in a gathering of two or more people where some of those present engage in motor racing or motor stunts can face penalties including prison or a fine.

But the West Bromwich East MP said the injunction should only be seen as a "short-term measure".

She said: "I'm pleased to see that the injunction against car cruising in the Black Country has been extended.

"Racing on our streets is dangerous and it has tragically cost people their lives. The injunction gives police the power to arrest people taking part anywhere in the Black Country, a power they would not otherwise have.

"Whilst it is an important short-term measure, it has to be part of a wide-ranging operation to drive this dangerous activity off our streets.

"I'll be working with the police and pushing local councils to do even more to tackle this dangerous behaviour on our roads."

The interim injunction has now been extended twice since it was first brought in last December.

Wolverhampton Council, which led the application on behalf of the other local authorities, said the injunction remains interim pending a judgement from the Supreme Court which is currently considering a similar injunction served against persons unknown, which may have a bearing on the Black Country case.

It comes after Ben Corfield, aged 19 and Liberty Charris, 16, both from Dudley, were [killed at an alleged car meet in Oldbury in November](#).

Express & Star, 25 May 2023:

<https://www.expressandstar.com/news/politics/2023/05/25/tougher-measures-needed-to-tackle-car-cruising-says-mp/>

EXHIBIT PB14A

Date set for next street racing injunction hearing

Released: Monday 24 July, 2023



The date has been set for the next hearing to consider the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country.

It will take place at 10.30am on Friday 10 November at Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham B4 6DS.

The interim injunction was allowed to continue by the High Court, with minor alterations, in May. It prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

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

November's hearing, before a High Court judge, will consider firstly the effect of a pending decision in a Supreme Court case heard in February which, like the interim street racing injunction, is served against 'persons unknown – if the decision has been handed down at this time.

It will also consider appropriate directions to take the street racing injunction application to a final hearing, or a further review hearing as the court deems fit.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Adults and Wellbeing, said: "We are pleased that the High Court saw fit to continue the street racing injunction at the last hearing in May, and it continues to have a very positive effect on preventing meets from occurring in our region.

"Street racing is noisy, dangerous and illegal and, as we have tragically seen, can result in death or serious injuries among drivers, passengers and spectators. The interim injunction provides a very strong deterrent to anyone thinking of taking part in this anti-social activity, and we look forward to returning to the High Court in November for the review hearing."

For more information, including details of full terms of the interim injunction with minor amendments and evidence in support of the application, please visit the street racing injunction pages of the applicants:

www.wolverhampton.gov.uk/street-racing-injunction, https://go.walsall.gov.uk/black_country_car_cruising_injunction, www.sandwell.gov.uk/streetracing, or www.dudley.gov.uk/car-cruising-injunction.

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

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

ENDS

City of Wolverhampton Council media release – review hearing date November

New earlier date set for next street racing injunction hearing

Released: Thursday 10 August, 2023



A new, earlier date has been set for the next hearing to consider the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country.

The case management hearing will now take place at 10.30am on Wednesday 4 October, 2023, at Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham B4 6DS, before Her Honour Judge Kelly.

The hearing has been brought forward from the previously announced date in November due to the early availability of the court.

The interim injunction was allowed to continue by the High Court, with minor alterations, in May. It prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

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

October's hearing will consider firstly the effect of a pending decision in a Supreme Court case heard in February which, like the interim street racing injunction, is served against 'persons unknown – if the decision has been handed down at this time.

It will also consider appropriate directions to take the street racing injunction application to a final hearing, or a further review hearing as the court deems fit.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Adults and Wellbeing, said: "We are pleased that the High Court saw fit to continue the street racing injunction at the last hearing in May, and it continues to have a very positive effect on preventing meets from occurring in our region.

"Street racing is noisy, dangerous and illegal and, as we have tragically seen, can result in death or serious injuries among drivers, passengers and spectators. The interim injunction provides a very strong deterrent to anyone thinking of taking part in this anti-social activity, and we look forward to returning to the High Court in October for a case management hearing."

For more information, including details of full terms of the interim injunction with minor amendments and evidence in support of the application, please visit the street racing injunction pages of the applicants:

www.wolverhampton.gov.uk/street-racing-injunction, https://go.walsall.gov.uk/black_country_car_cruising_injunction, www.sandwell.gov.uk/streetracing, or www.dudley.gov.uk/car-cruising-injunction.

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

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

ENDS

City of Wolverhampton Council media release – review hearing date October

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New earlier date set for next street racing injunction hearing

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A new, earlier date has been set for the next hearing to consider the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country.


The case management hearing will now take place at 10.30am on Wednesday 4 October, 2023, at Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham B4 6DS, before Her Honour Judge Kelly.

The hearing has been brought forward from the previously announced date in November due to the early availability of the court.

The interim injunction was allowed to continue by the High Court, with minor alterations, in May. It prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

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

October's hearing will consider firstly the effect of a pending decision in a Supreme Court case



New earlier date set for next street racing injunction hearing

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New earlier date set for next street racing injunction hearing

Published 11th August 2023



A new, earlier date has been set for the next hearing to consider the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country.

The case management hearing will now take place at 10.30am on Wednesday 4 October, 2023, at Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham B4 6DS, before Her Honour Judge Kelly.

The hearing has been brought forward from the previously announced date in November due to

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New earlier date set for next street racing injunction hearing

Published on 10 August 2023

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A new, earlier date has been set for the next hearing to consider the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country.



Street racing banned in the Black Country

The case management hearing will now take place at 10.30am on Wednesday 4 October, 2023, at Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham B4 6DS, before Her Honour Judge Kelly.

The hearing has been brought forward from the previously announced date in November due to the early availability of the court.

The interim injunction was allowed to continue by the High Court, with minor alterations, in May. It prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

The interim injunction covers the whole of the boroughs of Wolverhampton

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New earlier date set for next street racing injunction hearing

Posted on: 10/08/2023

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A new, earlier date has been set for the next hearing to consider the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country.

The case management hearing will now take place at 10.30am on Wednesday 4 October, 2023, at Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham B4 6DS, before Her Honour Judge Kelly.

The hearing has been brought forward from the previously announced date in November due to the early availability of the court.

The interim injunction was allowed to continue by the High Court, with minor alterations, in May. It prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

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

October's hearing will consider firstly the effect of a pending decision in a Supreme Court case heard in February which, like the interim street racing injunction, is served against 'persons unknown' – if the decision has been handed down at this time.

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Next court hearing to consider car cruising ban in Black Country is brought forward

By [Isabelle Parkin](#) | [Wolverhampton](#) | [Crime](#) | Published: Aug 10, 2023

The next court hearing set to consider a car cruising ban in the Black Country has been brought forward.

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The next court hearing considering the interim injunction has been brought forward

A case management hearing which will consider the interim injunction banning street racing in the region was expected to take place in November.

Now, Wolverhampton Council has said that due to early availability at the court, the hearing will be held at 10.30am on October 4 at the Birmingham District Registry.

It comes after the High Court allowed an interim injunction to continue in May, with minor alterations, which prohibits forms of dangerous driving in the region.

It prevents people from participating – as drivers, riders or passengers – in a gathering of two or more people at which some of those present engage in motor racing, stunts, or other forms of dangerous driving.

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The interim injunction banning 'street racing', also known as 'car cruising', in the Black Country has been extended by the High Court, with minor alterations, at a hearing on Friday.

The interim injunction prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving. It covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and anyone breaching it will be in contempt of court and could face penalties including imprisonment, a fine or an order to have their assets seized.

For more information, including details of full terms of the interim injunction with minor amendments and evidence in support of the application, please visit the street racing injunction pages of the applicants: Wolverhampton - <https://www.wolverhampton.gov.uk/street-racing-injunction>, Walsall - https://go.walsall.gov.uk/black_country_car_cruising..., Sandwell - <https://www.sandwell.gov.uk/streetracing>, or Dudley - <https://www.dudley.gov.uk/car-cruising-injunction> <https://www.wolverhampton.gov.uk/street-racing-injunction>, https://go.walsall.gov.uk/black_country_car_cruising..., <https://www.sandwell.gov.uk/streetracing>, or www.dudley.gov.uk/car-cruising-injunction.

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

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



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The interim injunction banning 'street racing', also known as 'car cruising', in the Black Country has been extended by the High Court, with minor alterations. Full story [wolverhampton.gov.uk/news/high-court-continues-to-extend-injunction](https://www.wolverhampton.gov.uk/news/high-court-continues-to-extend-injunction) @WalsallCouncil @dudleymbc @SandwellCouncil @WMPolice (1/4)



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For more information, please visit the interim street racing injunction pages of the applicants: Wolverhampton - [wolverhampton.gov.uk/street-racing-injunction](https://www.wolverhampton.gov.uk/street-racing-injunction), Walsall - go.walsall.gov.uk/black_country_car_cruising..., Sandwell - [sandwell.gov.uk/streetracing](https://www.sandwell.gov.uk/streetracing), or Dudley - [dudley.gov.uk/car-cruising-injunction](https://www.dudley.gov.uk/car-cruising-injunction). (4/4)



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The interim injunction prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving. It covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and anyone breaching it will be in contempt of court and could face penalties including imprisonment, a fine or an order to have their assets seized.

For more information, including details of full terms of the interim injunction with minor amendments and evidence in support of the application, please visit the street racing injunction pages of the websites of the applicants, the City of Wolverhampton Council, Dudley Council, Sandwell Council and Walsall Council. Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

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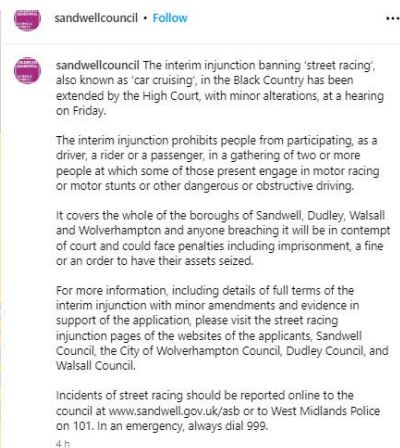
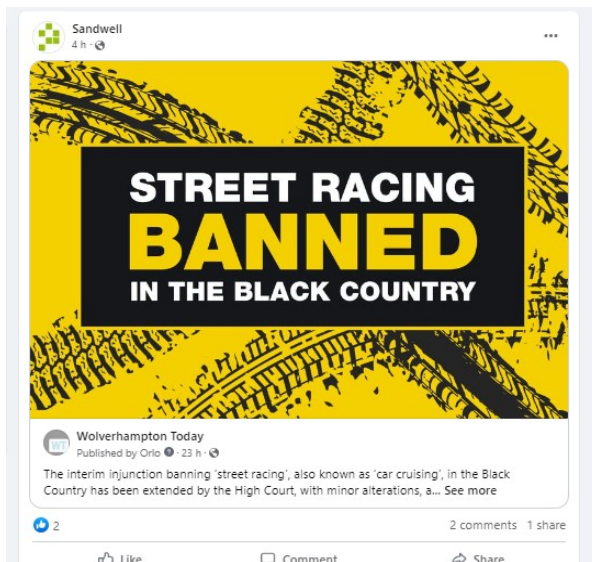
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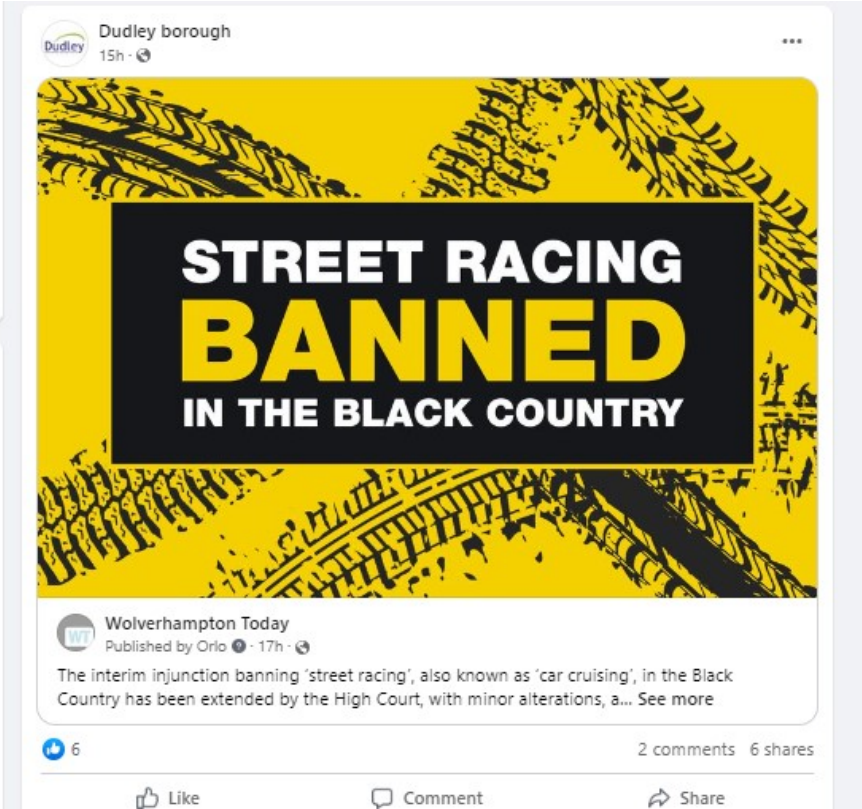
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For more information, including details of full terms



Dudley Council social media – interim injunction granted



Wolverhampton Today


Published by Orlo

10 August

A new date has been set for the next hearing to consider the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country. It will now take place at 10.30am on Wednesday 4 October, 2023, at Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham B4 6DS, before Her Honour Judge Kelly.



The hearing has been brought forward from the previously announced date in November due to the early availability of...

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It will now take place at 10.30am on Wed 4 October, 2023, at Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull St, Birmingham B4 6DS, before Her Honour Judge Kelly. The hearing has been brought forward due to the early availability of the court. (2/3)



1



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A new date has been set for the next hearing to consider the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country. It will now take place at 10.30am on Wednesday 4 October, 2023, at Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham B4 6DS, before Her Honour Judge Kelly.

The hearing has been brought forward from the previously announced date in November due to the early availability of the court.

The interim injunction which is in effect across Wolverhampton, Dudley, Sandwell and Walsall prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

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The hearing has been brought forward from the previously announced date in November due to the early availability of the court.

The interim injunction which is in effect across Sandwell, Wolverhampton, Dudley and Walsall prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.


Find out more at www.sandwell.gov.uk/streetracing

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EXHIBIT PB14A



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EXHIBIT PB14A

High Court grants order banning street racing in the Black Country

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ORDER BANNING STREET RACING IN THE BLACK COUNTRY

An interim injunction banning 'street racing', also known as 'car cruising', is in force in the Black Country.

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

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

"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

"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

"Drifting" – turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input

"Undertaking" – Passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code.

The Injunction has a Power of Arrest attached to it which gives the police the power to arrest anyone who breaches it.

Breach of an injunction is a contempt to court and if proved the court has the power to impose a sentence of imprisonment, a fine, or an order seizing a person's assets.

The Black Country Area includes all of the Boroughs of Wolverhampton, Dudley, Sandwell and Walsall.

Full details of the interim injunction, including evidence presented to the High Court, the Sealed Order, power of arrest and other supporting documentation such as a map showing the Black Country area, can be found in the downloads section of this page.

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

A case management hearing to consider the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country will take place at 10.30am on Wednesday 4 October, 2023, at Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham B4 6DS, before Her Honour Judge Kelly.



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City of Wolverhampton Council street racing injunction page

Street racing



High Court grants order banning street racing in the Black Country

An interim injunction banning 'street racing', also known as 'car cruising', is in force in the Black Country.

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- "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
- "Drifting" – turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input
- "Undertaking" – Passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code.

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The Black Country Area includes all of the Boroughs of Sandwell, Dudley, Walsall and Wolverhampton.

Full details of the interim injunction, including evidence presented to the High Court, the Sealed Order, Power of Arrest and other supporting documentation such as a map showing the Black Country area, can be found on [our street racing downloads webpage](#).

Incidents of street racing should be [reported online to the council](#) or to West Midlands Police on 101. In an emergency, always dial 999.



[Video evidence of street racing presented to the High Court](#) (Warning, some videos contain scenes that some people may find distressing).

Visit [our street racing injunction downloads webpage](#) and [Wolverhampton City Council's street racing injunction webpage](#) for court documents relating to the interim injunction.

Next date for street racing injunction hearing

A case management hearing to consider the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country will take place at 10.30am on Wednesday 4 October 2023, at Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham B4 6DS, before Her Honour Judge Kelly.

The hearing has been brought forward from the previously announced date in November due to the early availability of the court.

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Car cruising injunction

High Court grants order banning street racing in the Black Country

An interim injunction banning 'street racing', also known as 'car cruising', is in force in the Black Country.

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The Injunction has a Power of Arrest attached to it which gives the police the power to arrest anyone who breaches it.

Breach of an injunction is a contempt of court and if proved the court has the power to impose a sentence of imprisonment, a fine, or an order seizing a person's assets.

The Black Country Area includes all of the Boroughs of Wolverhampton, Dudley, Sandwell and Walsall.

Full details of the interim injunction, including evidence presented to the High Court, the Sealed Order, power of arrest and other supporting documentation such as a map showing the Black Country area, can be found in the downloads section of this page.

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

[Audio information about the interim street racing injunction application.](#)

A case management hearing to consider the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country will take place at 10.30am on Wednesday 4 October, 2023, at Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham B4 6DS, before Her Honour Judge Kelly.

Downloads

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- [Notice of Hearing Case Management Conference 10 November 2023 \(21/07/23\)](#)

Dudley Council street racing injunction page

Black Country street racing injunction

Overview

An interim injunction banning street racing (also known as car cruising) is in force in the Black Country.

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

You can download full details of the interim injunction in the supporting documents section.

What the interim injunction means

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

At these gatherings, some people engage in motor racing or motor stunts or other dangerous or obstructive driving. For the purposes of the injunction, stunts are defined as driving manoeuvres including, but not limited to:

- 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
- 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
- drifting - turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input
- undertaking - passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code.

Details of the injunction

The injunction has a power of arrest attached to it. This gives the police the power to arrest anyone who breaches it. Breach of an injunction is a contempt of court and, if proved, the court has the power to impose:

- a sentence of imprisonment
- a fine
- an order seizing a person's assets

Next date for street racing injunction hearing

A new date has been set for the next hearing to consider the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country. It will now take place at 10.30am on Wednesday 4 October, 2023, at Birmingham District

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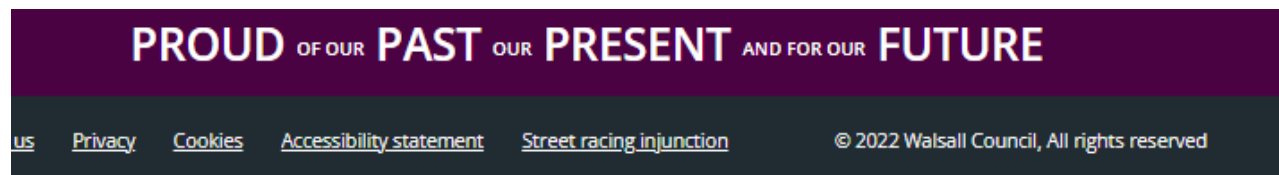
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WolverhamptonTod

@WolverhamptonToday 2.16K s

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Interim High Court street racing injunction

5 views • 38 minutes ago




Comp list by

63 view



Interim High Court street racing injunction

 WolverhamptonToday

2.16K subscribers

Analytics

Edit video

0

Share

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Save

27 views 17 hours ago

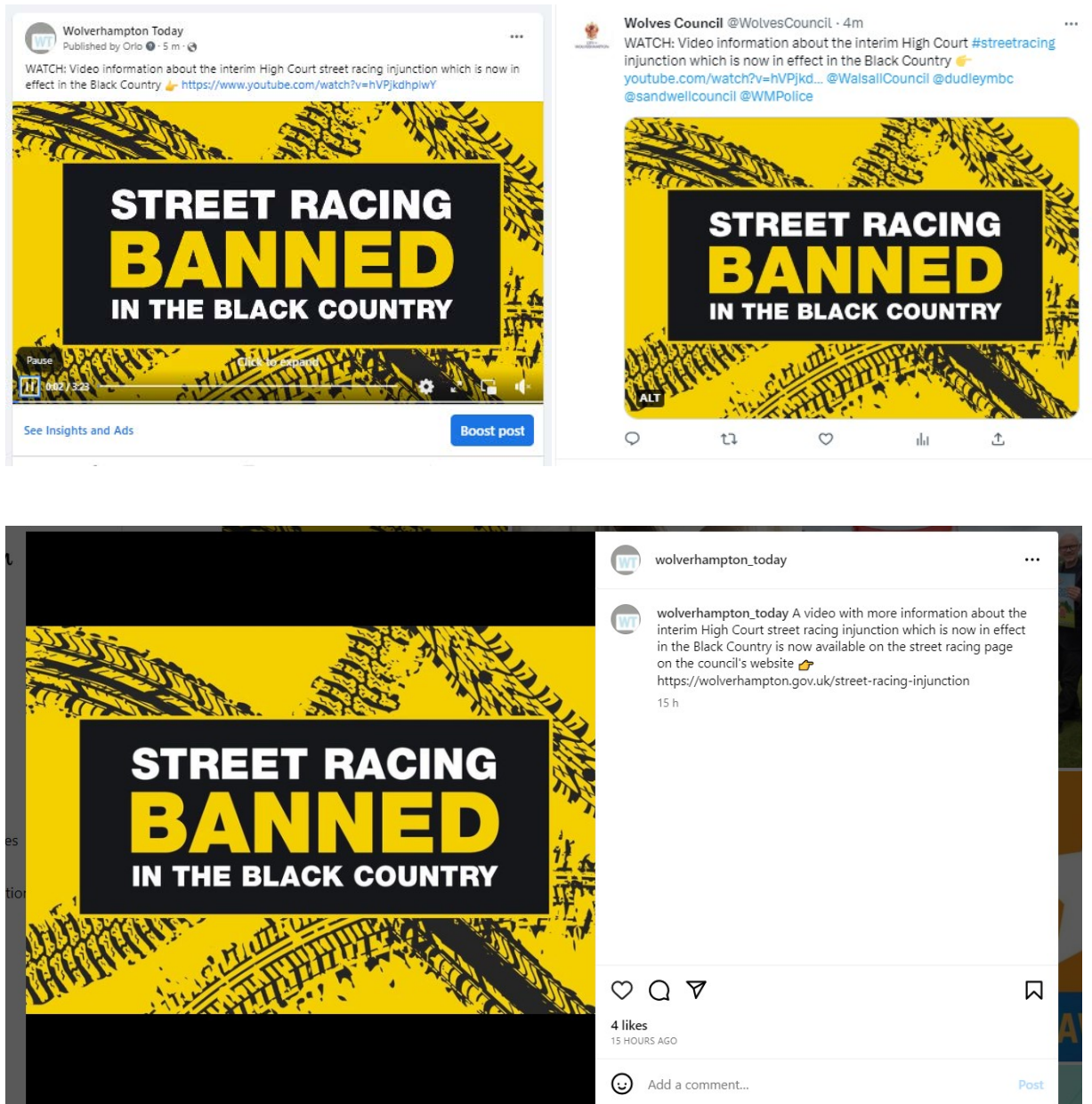
Video information about the interim High Court street racing injunction which is now in effect in the Black Country. For more details, please visit www.wolverhampton.gov.uk/street-racing-injunction

Show more

City of Wolverhampton Council YouTube - video

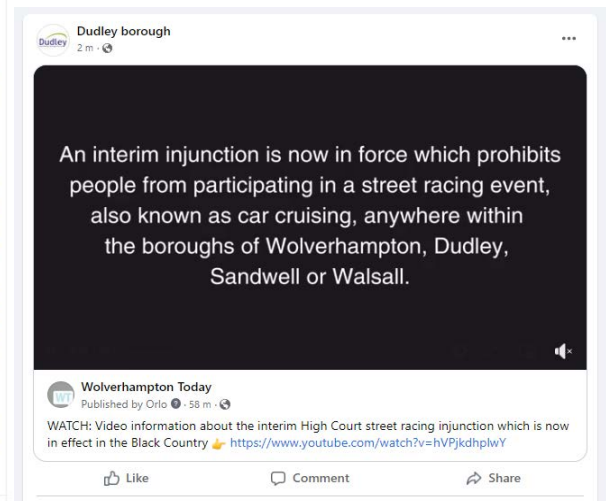
B 120

EXHIBIT PB14A

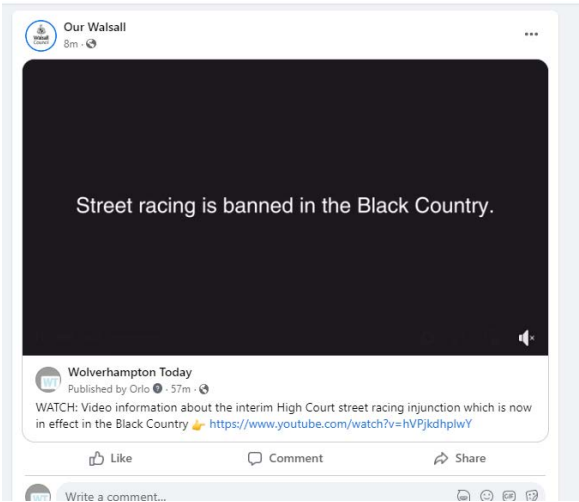


City of Wolverhampton Council social media – video

EXHIBIT PB14A

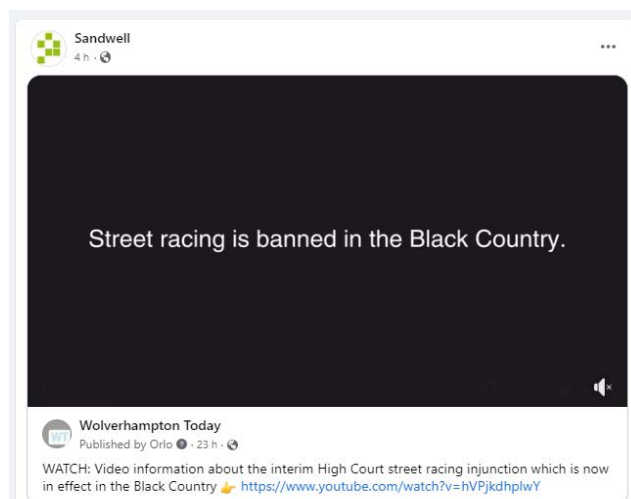


Dudley Council social media – video



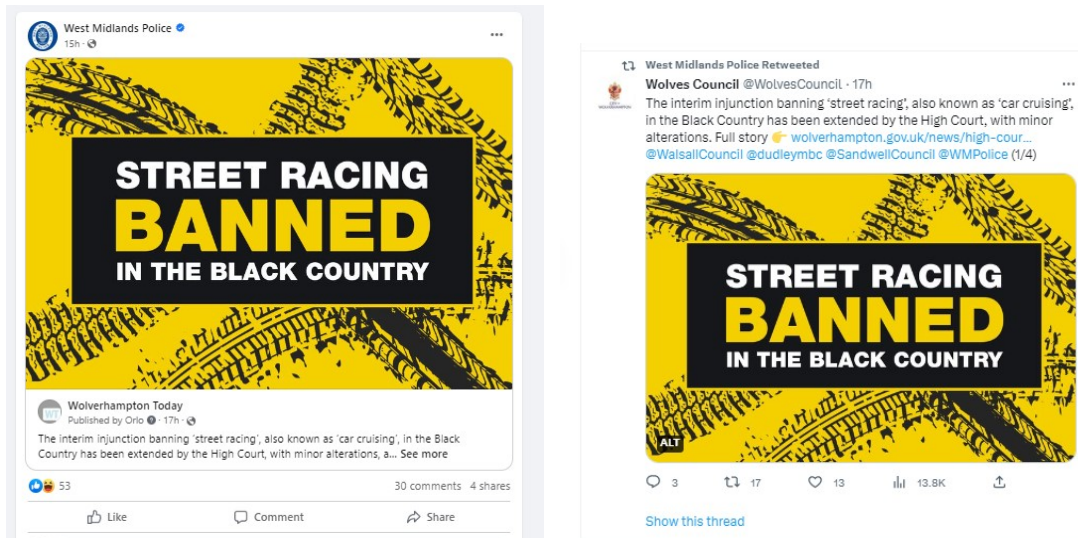
Walsall Council social media – video

EXHIBIT PB14A

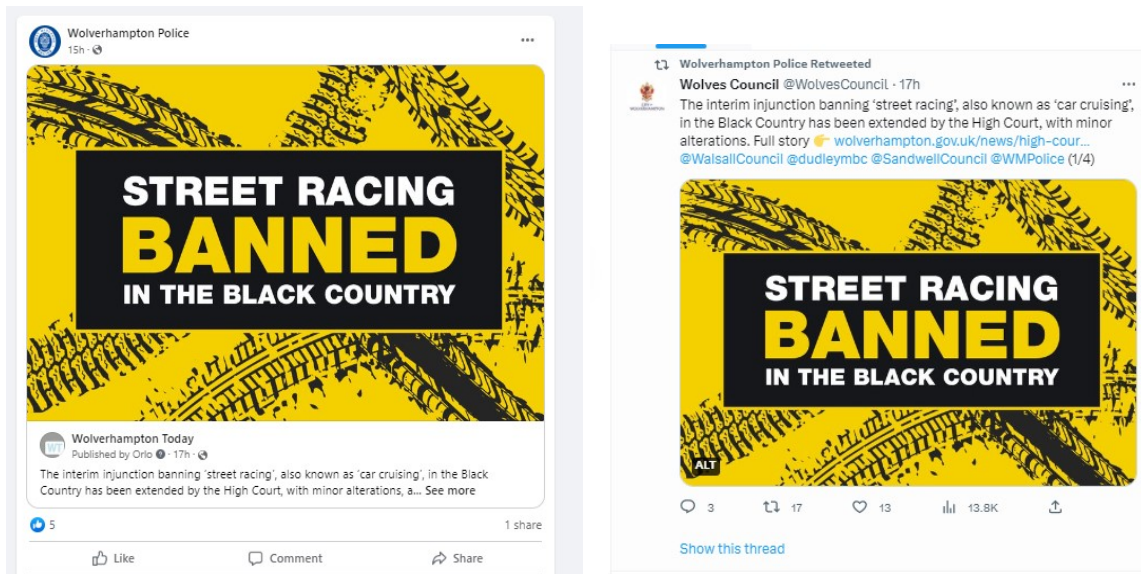


Sandwell Council social media – video

EXHIBIT PB14A



West Midlands Police social media – interim injunction granted



Wolverhampton Police social media – interim injunction granted



Dudley Police social media – interim injunction granted

EXHIBIT PB14A



Sandwell Police social media – interim injunction granted



Walsall Police social media – interim injunction granted

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

Hi Paul,

That's now shared across all WMP Force level Facebook, Twitter and Instagram accounts, and also from the four Black Country local policing area accounts. Also shared on Instagram.

@Darren Colley – Could you add a link to the council's story to our website as described below?

Thanks,

Mike

Mike Woods | News Manager
Corporate Communications | West Midlands Police
T: Newsdesk: 0121 626 5858 or 101 (ext. 801 2055) | M: 07741 816 450

Confirmation of West Midlands Police activity – interim injunction granted

EXHIBIT PB14A

EXHIBIT PB14B

Statement of: Paul Brown
Statement no: 14
Statement for: Claimants
Exhibits: PB14A-14C
Dated: 22.09.2023

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

CLAIM NO: KB-2022-BHM-000188

B E T W E E N:

- (1) **Wolverhampton City Council**
- (2) **Dudley Metropolitan Borough Council**
- (3) **Sandwell Metropolitan Borough Council**
- (4) **Walsall Metropolitan Borough Council**

Claimants

and

1. Persons Unknown who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving

2 Persons Unknown who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving

3. Persons Unknown promoting organising publicising (by any means whatsoever) any gathering between the hours of 3:00pm and 7:00am of 2 or more persons with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving within the Black Country Area shown on Plan A (attached)

4. Persons Unknown being drivers, riders or passengers in or on motor vehicle(s) who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) at which they engage in motor racing or motor stunts or other dangerous or obstructive driving

Defendants

EXHIBIT PB14B

This is the document marked "Exhibit PB14B" and referred to in the witness statement of Paul Brown dated 22 September 2023.

Media Release

CITY OF
WOLVERHAMPTON
COUNCIL

Street racers could face jail for breaching court injunction

Released: Tuesday 6 June, 2023



Would-be 'street racers' and 'car cruisers' are being warned they could face a prison sentence if they breach the interim High Court injunction in force across the Black Country.

The interim injunction banning 'street racing', also known as 'car cruising', prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

It came into effect in December 2022 and was ordered to continue by the High Court at a hearing on 19 May 2023. It covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and anyone breaching it will be in contempt of court and could face penalties including imprisonment, a fine or an order to have their assets seized.

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

Councillor Jasbir Jaspal, the council's Cabinet Member for Adults and Wellbeing, said: "People who are thinking of taking part in street racing or car cruising should be under no illusions as to the penalties they may face.

"Breaching the interim injunction in place across the Black Country would be contempt of court, which is a very serious offence.

"As such, individuals could face up to two years' in jail, an unlimited fine or have assets, such as their vehicle, seized.

"In addition, a power of arrest applies to the interim injunction. This gives police the power to arrest suspects and bring them before the court, in as little as 24 hours, to answer allegations that they have breached the injunction, so any potential breaches can be dealt with very swiftly indeed.

"These are stiff punishments which we hope will prove a deterrent to would-be street racers or car cruisers and therefore help keep our region's streets free of this anti-social and dangerous behaviour."

For more information, including details of full terms of the interim injunction with minor amendments and evidence in support of the application, please visit the street racing injunction pages of the applicants:

www.wolverhampton.gov.uk/street-racing-injunction,
https://go.walsall.gov.uk/black_country_car_cruising_injunction, www.sandwell.gov.uk/streetracing, or
www.dudley.gov.uk/car-cruising-injunction.

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

ENDS

City of Wolverhampton Council media release – 6 June

Statement of: Paul Brown
Statement no: 14
Statement for: Claimants
Exhibits: PB14A-14C
Dated: 22.09.2023

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

CLAIM NO: KB-2022-BHM-000188

B E T W E E N:

- (1) Wolverhampton City Council
- (2) Dudley Metropolitan Borough Council
- (3) Sandwell Metropolitan Borough Council
- (4) Walsall Metropolitan Borough Council

Claimants

and

1. Persons Unknown who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving

2 Persons Unknown who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving

3. Persons Unknown promoting organising publicising (by any means whatsoever) any gathering between the hours of 3:00pm and 7:00am of 2 or more persons with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving within the Black Country Area shown on Plan A (attached)

4. Persons Unknown being drivers, riders or passengers in or on motor vehicle(s) who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) at which they engage in motor racing or motor stunts or other dangerous or obstructive driving

Defendants

EXHIBIT PB14C

This is the document marked "Exhibit PB14C" and referred to in the witness statement of Paul Brown dated 22 September 2023.

EXHIBIT PB14C



Walsall Police
24 June · 🌐

Street racing risks lives and turns our roads into a danger zone.

It's time to end this reckless behaviour and ensure everyone can feel safe on the roads.

Read more here ➡ <http://ow.ly/zlx250OFzju>



Walsall Police
7 June · 🌐

🔴 #Sandwell just put the brakes on street racing!

A High Court Injunction is in place to stop anyone gathering to race or perform stunts in cars, motorbikes or quad bikes on the city's streets.

The new powers mean it's not only drivers who face prosecution but also those organising and attending car cruising meets 🚗🔥

Read more ➡ <http://ow.ly/zlx250OFzju>



Wolverhampton Police
27 June · 🌐

It's time to end dangerous street racing that has plagued the Black Country streets for far too long and put lives at risk.

An injunction is in place to stop anyone gathering to race or perform stunts in cars, motorbikes or quad bikes on the streets 🚗🔥

More here ➡ <http://ow.ly/zlx250OFzju>



Wolverhampton Police
7 June · 🌐

🔴 #Wolverhampton just put the brakes on street racing!

A High Court Injunction is in place to stop anyone gathering to race or perform stunts in cars, motorbikes or quad bikes on the city's streets.

The new powers mean it's not only drivers who face prosecution but also those organising and attending car cruising meets 🚗🔥... See more



Wolverhampton Police
16 July · 🌐

🔴 #Wolverhampton has slammed the brakes on street racing 🚗🔥

A High Court Injunction is in force to stop anyone gathering to race or perform stunts in cars, motorbikes or quad bikes on the city's streets.

More here ➡ <http://ow.ly/zlx250OFzju>



Dudley Police
7 June · 🌐

🔴 #Dudley just put the brakes on street racing!

A High Court Injunction is in place to stop anyone gathering to race or perform stunts in cars, motorbikes or quad bikes on the city's streets.

The new powers mean it's not only drivers who face prosecution but also those organising and attending car cruising meets 🚗🔥... See more



EXHIBIT PB14C

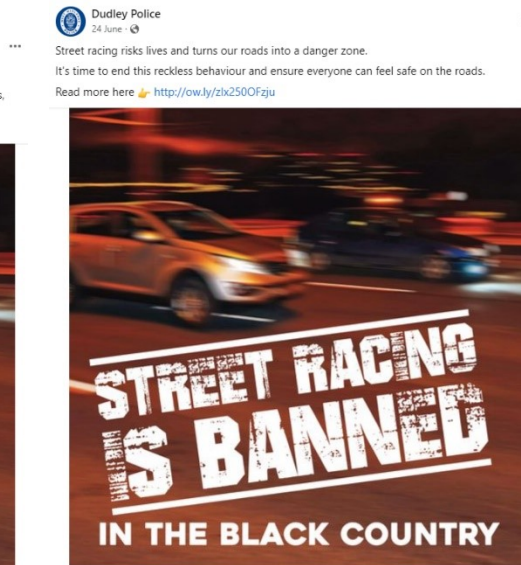


EXHIBIT PB14C



EXHIBIT PB14C

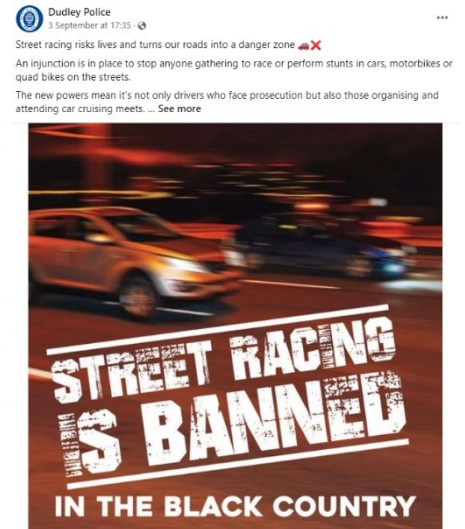


EXHIBIT PB14C



EXHIBIT PB14C

Wolverhampton Police reposted
Wolves Council @WolvesCouncil · Jul 2
 #Streetracing is banned in the Black Country by a High Court injunction. Full details [Wolverhampton orio.uk/CJJD7](https://www.wolverhampton.gov.uk/CJJD7) [Walsall orio.uk/QBU8g](https://www.walsall.gov.uk/QBU8g) [Sandwell orio.uk/6t0IY](https://www.sandwell.gov.uk/6t0IY), [Dudley dudley.gov.uk/car-cruising-1...](https://www.dudley.gov.uk/car-cruising-1...) [@WalsallCouncil](https://www.walsallcouncil.co.uk/dudleymbc) [@dudleymbc](https://www.dudleymbc.co.uk) [@SandwellCouncil](https://www.sandwellcouncil.co.uk) [@WMPolice](https://www.wmpolice.co.uk)



1 9 3 4,469

Wolverhampton Police reposted
Wolves Council @WolvesCouncil · Jun 2
 #Streetracing is banned in the Black Country by a High Court injunction. Full details [Wolverhampton orio.uk/1o7tZ](https://www.wolverhampton.gov.uk/1o7tZ) [Walsall orio.uk/U9g68](https://www.walsall.gov.uk/U9g68) [Sandwell orio.uk/SGMx1](https://www.sandwell.gov.uk/SGMx1), [Dudley dudley.gov.uk/car-cruising-1...](https://www.dudley.gov.uk/car-cruising-1...) [@WalsallCouncil](https://www.walsallcouncil.co.uk/dudleymbc) [@dudleymbc](https://www.dudleymbc.co.uk) [@SandwellCouncil](https://www.sandwellcouncil.co.uk) [@WMPolice](https://www.wmpolice.co.uk)



2 9 6 6,482

Wolverhampton Police reposted
Wolves Council @WolvesCouncil · Jun 7
 Would-be #StreetRacers & #CarCruisers are being warned they could face a prison sentence if they breach the Interim High Court injunction in force across the Black Country. Full story [wolverhampton.gov.uk/news/street-ra...](https://www.wolverhampton.gov.uk/news/street-ra...) [@WalsallCouncil](https://www.walsallcouncil.co.uk/dudleymbc) [@sandwellcouncil](https://www.sandwellcouncil.co.uk/dudleymbc) [@WMPolice](https://www.wmpolice.co.uk)



1 8 4 4,691

Walsall Police @WalsallPolice · Sep 10
 It's time to end dangerous street racing that has plagued our streets for far too long and put lives at risk.

An injunction is in place to stop anyone gathering to race or perform stunts in cars, motorbikes or quad bikes on the streets 🚗🏍️

More here [ow.ly/zBJW50PjlaN](https://www.wolverhampton.gov.uk/news/street-ra...)



1 2 8 1,030

Wolverhampton Police @WolvesPolice · Jun 24
 Street racing risks lives and turns our roads into a danger zone.

It's time to end this reckless behaviour and ensure everyone can feel safe on the roads.

Read more here [ow.ly/zlx250OFzju](https://www.wolverhampton.gov.uk/news/street-ra...)



Wolverhampton Police @WolvesPolice · Jun 16
 Revving engines and screeching tires no more! 🚗🏍️

Street racing is BANNED in #Wolverhampton 🚫

A High Court Injunction is in force to stop anyone gathering to race or perform stunts in cars, motorbikes or quad bikes on the city's streets 🚗🏍️

More here [ow.ly/zlx250OFzju](https://www.wolverhampton.gov.uk/news/street-ra...)



2 3 5 2,005

Walsall Police @WalsallPolice · Sep 3
 We won't tolerate illegal street racing or cruising on our roads 🚗🏍️❌

Our Traffic team, drones and neighbourhood officers work together with partners to deal firmly and swiftly with anyone breaching the High Court injunction which bans these events [ow.ly/xYL50PHfnH](https://www.wolverhampton.gov.uk/news/street-ra...)



2 2 17 2,092

EXHIBIT PB14C



EXHIBIT PB14C

Walsall Police reposted
Wolves Council @WolvesCouncil · Jun 2
#Streetracing is banned in the Black Country by a High Court injunction. Full details 📰 Wolverhampton orlo.uk/167Z Walsall orlo.uk/U9gt6 Sandwell orlo.uk/SGMx1, Dudley dudley.gov.uk/car-cruising-1... @WalsallCouncil @dudleymbc @SandwellCouncil @WMPolice



2 9 6 6,483

West Midlands Police reposted
Wolves Council @WolvesCouncil · Aug 10
A new date has been set for the next hearing to consider the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country. Full story 📰 orlo.uk/kf1CP (1/3) @WMPolice @WalsallCouncil @sandwellcouncil @dudleycouncil



2 13 9 13.7K

West Midlands Police @WMPolice · Aug 4
We've made a series of arrests for breaching the street racing injunction as we prevent the region's roads being used as race tracks.
Our officers are routinely on patrol and ready to act on info about illegal gatherings planned across the region.
ow.ly/ayQJ50PsHnz



13 17 69 15.9K

Additional West Midlands Police social media posts

i) Statement of: Paul Brown
ii) Statement No: 15
iii) For: Claimants
iv) Dated: 22.9.2023
v) Exhibits: PB15A

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

CLAIM NO: KB-2022-BHM000188

B E T W E E N:

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

Claimants

and

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

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

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

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

Defendants

FIFTEENTH WITNESS STATEMENT OF PAUL STEVEN BROWN

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

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief. This is my 15th statement in these proceedings.
2. The City of Wolverhampton Council is the authority which is leading the joint application of the Councils of Wolverhampton, Dudley, Sandwell and Walsall (hereinafter referred to as the "Black Country Boroughs") seeking injunctive relief to restrain street racing (also referred to as car cruising) in the Black Country Boroughs.
3. I have been employed since 25 June 2007 as a Senior Communications Adviser and latterly Communications Manager in the communications team of the City of Wolverhampton Council.
4. In collaboration with my colleagues Pardip Nagra (ASB Team Leader) and Adam Sheen (Senior Solicitor, Legal Services) a communications plan has been developed, with the initial steps implemented, initially to raise awareness of the application to the High Court for an interim street racing injunction for the Black Country Area and, should the court be minded to grant this, to promote the existence of the injunction, and the power of arrest, once it is formally in place.
5. Recognising this is a joint enterprise, I have been liaising closely with my counterparts in the communications teams of Dudley, Sandwell and Walsall Councils and West Midlands Police.
6. The order of the High Court made by the Honourable Mr Justice Ritchie on 19 May 2023 required the Claimants to take a series of publicity steps publicising the outcome of the hearing to bring notice of the hearing to the attention of "Persons Unknown".

7. As a result, a range of communications activity has taken place following the hearing of 19 May 2023, and these are described in my 14th statement. The court may wish to know that a total of 24 posts were issued on social media (Facebook, Twitter (now called 'X') and Instagram between 19 May and 15 September 2023. These achieved:

Reach of 152.7k. This is described by Orlo, the social media management system used by the City of Wolverhampton Council as follows: "This shows you the total number of times the posts in this campaign have been seen by different people. Please note, Twitter doesn't provide us with this data so stats from this network are not included in this total.

Impressions of 204k. "This gives you the total number of times the posts in this campaign have been shown on a person's screen."

Engagement rate 0.2%. "This shows the level of engagement the content you have shared has generated during the campaign."

Total comments 59. "This is the total number of public comments or mentions received for the reported time period."

Total likes 145

Shares/retweets 118

Further information can be found in "**Exhibit PB15A**" attached hereto, an activity report generated through Orlo.

Please note, the above relates only to posts issued by The City of Wolverhampton Council. Partner councils and West Midlands Police shared a number of posts, and the data around reach and impressions will be captured in the above. They may have received additional comments on their shared posts, which are not captured in the above, which would affect the overall engagement rate.

8. Furthermore, between 19 May 2023, and 8 September, the City of Wolverhampton Council's street racing webpage received 573 views, the Walsall Council street racing webpage received 582 views, the Sandwell Council street racing webpage received 248 views (with a further 86 visits to its downloads page) and the Dudley Council street racing webpage received 342 views.
9. The Court may also wish to know that the City of Wolverhampton Council shared street racing information in some of its weekly residents' e-newsletter, which reaches approximately 18,000 people, and that Sandwell Council shared street racing information in some of its weekly e-newsletters, which are sent to approximately 30,000 people per bulletin, depending on categories selected for the e-newsletter.
10. I will continue to ensure future steps in the Communications Plan are acted upon at the relevant time and will continue to liaise with my counterparts in Communications Teams of Dudley, Sandwell and Walsall Councils and West Midlands Police to ensure that they are disseminating the information as and when necessary.

STATEMENT OF TRUTH

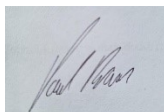
I believe that the facts stated in this Witness Statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Full Name: PAUL STEVEN BROWN

Position: COMMUNICATIONS MANAGER

Name of Claimant: City of Wolverhampton Council

Signed



Print Name PAUL BROWN

Dated: 22 September 2023

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

CLAIM NO: KB-2022-BHM-000188

B E T W E E N:

- (1) Wolverhampton City Council**
- (2) Dudley Metropolitan Borough Council**
- (3) Sandwell Metropolitan Borough Council**
- (4) Walsall Metropolitan Borough Council**

Claimants

and

- 1. Persons Unknown who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving**
- 2 Persons Unknown who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving**
- 3. Persons Unknown promoting organising publicising (by any means whatsoever) any gathering between the hours of 3:00pm and 7:00am of 2 or more persons with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving within the Black Country Area shown on Plan A (attached)**
- 4. Persons Unknown being drivers, riders or passengers in or on motor vehicle(s) who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) at which they engage in motor racing or motor stunts or other dangerous or obstructive driving**



Defendants

EXHIBIT PB15A

This is the document marked "Exhibit PB15A" and referred to in the witness statement of Paul Brown dated 22 September 2023.







CAMPAIGN REPORT

19 May 23 - 15 Sep 23 **Street Racing**

 Twitter 1 Account	0	8
	MESSAGES	POSTS
 Facebook 1 Account	0	8
	MESSAGES	POSTS
 Instagram 1 Account	0	8
	MESSAGES	POSTS

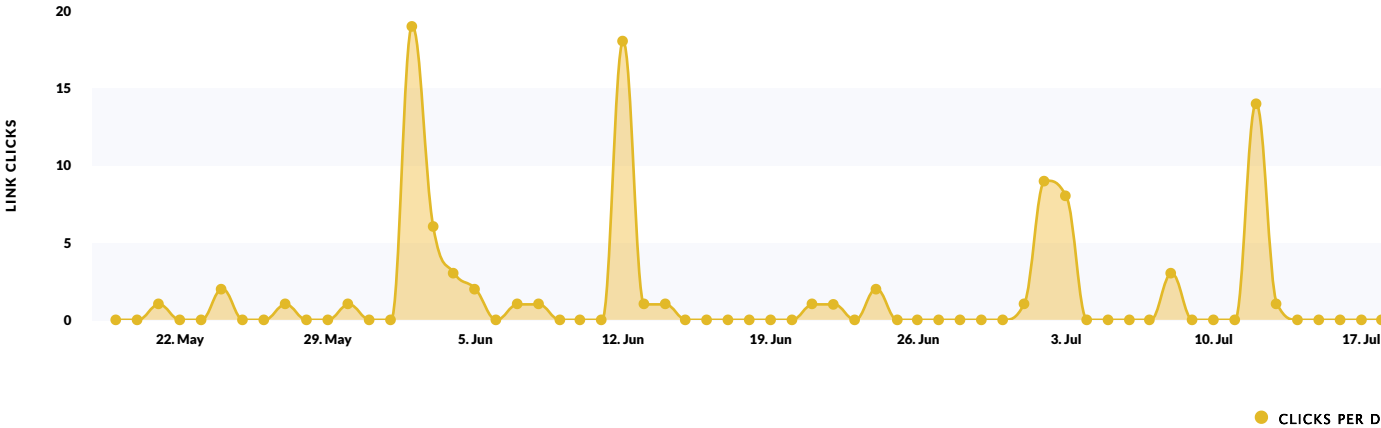
Overview

ALL NETWORKS TWITTER FACEBOOK INSTAGRAM

 DAYS OLD 257	 TOTAL POSTS 24	 TOTAL CLICKS 93	 REACH 152.7k	 IMPRESSIONS 204k
 ENGAGEMENT RATE 0.20%				

Link clicks [?]

ALL NETWORKS TWITTER FACEBOOK INSTAGRAM LINKEDIN YOUTUBE NEXTDOOR



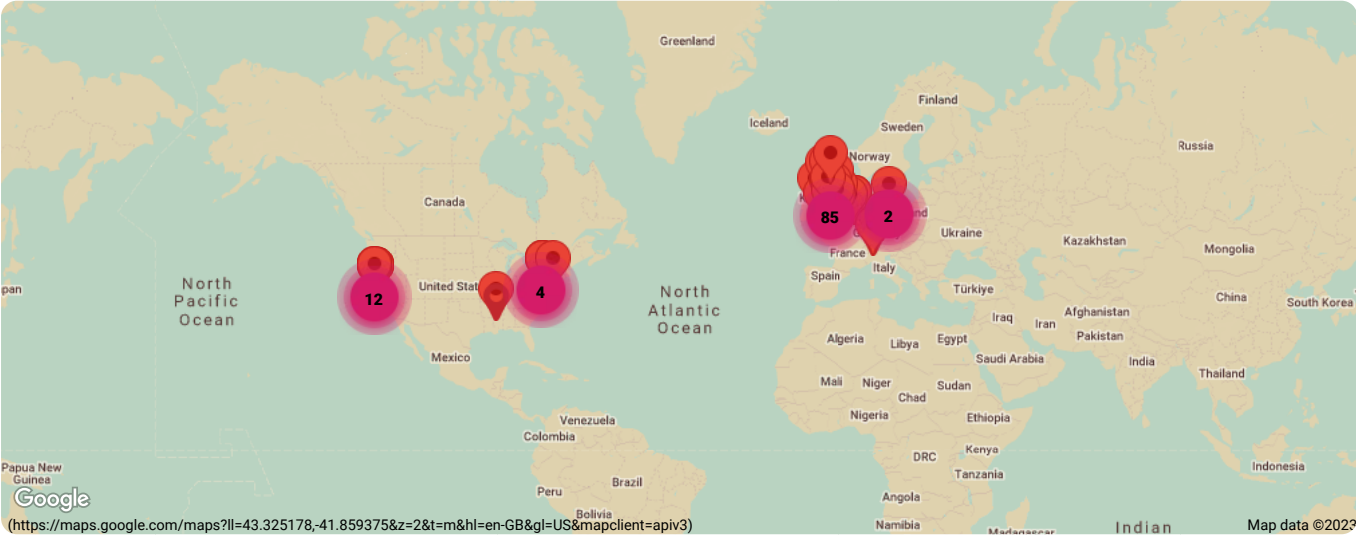
TOTAL CLICKS

106

Make sure it all clicks into place!

Shorten URLs and get the most accurate reporting by using orlo.uk (unsafe:"http://orlo.uk\"") tracking links in your posts! Remember, for Instagram and Youtube, no data will be available as posts on these channels can't contain links

Global Link Clicks ?



Locations

United Kingdom	85	
United States	12	
Belgium	3	
Germany	2	
France	1	
Ireland	1	
Italy	1	

Posts breakdown

Posts by Network

Twitter	8	
Facebook	8	
Instagram	8	

f Facebook
TOTAL REACH

147.6k

Instagram
TOTAL REACH

5.2k



TOTAL COMMENTS

59



FROM CUSTOMERS

59



TOTAL LIKES

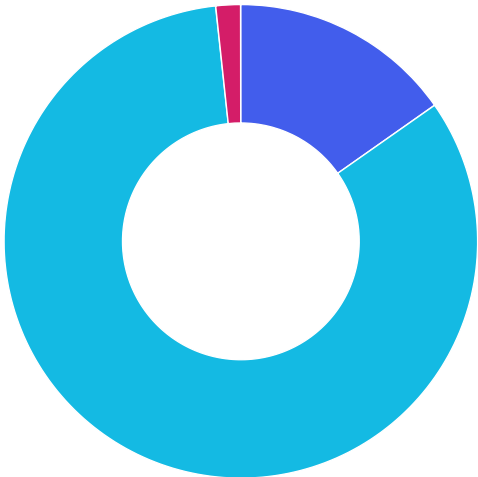
145



SHARES / RETWEETS

118

Inbound Comments




- 9 | Twitter
- 49 | Facebook
- 1 | Instagram Business


Top Posts

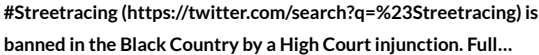
By Clicks

View post




WolvesCouncil

 02 Jun 2023 | 10:01








 6


 9

 2

 21

 6.4K

 0.59

 6

 1

21

CLICKS

View post



WolverhamptonToday

 02 Jun 2023 | 10:01







 13

 2

 7

 15

 9.4K

 10.2K

 0.36

 13

 2

15

CLICKS

View post



WolverhamptonToday

 12 Jul 2023 | 12:07







 6

 2

 7

 12

 15.6K

 15.7K

 0.17

 6

 3

12

CLICKS

View post



WolverhamptonToday

 12 Jun 2023 | 11:00







 4

 3

 5

 10

 11K

 11.3K

 0.19

 4

 3

View post



WolvesCouncil

 12 Jun 2023 | 11:00







 1

 2

 0

 10

 1.8K

 0.72

 1

 3

View post



WolverhamptonToday

 02 Jul 2023 | 13:00







 13

 5

 12

 9

 11.4K

 12.4K

 0.31

 15

 3

View post

WolvesCouncil

 02 Jul 2023 | 13:00












































 3

 9

 4.4K

 0.5

 3

	#Streetracing (https://twitter.com/search?q=%23Streetracing) is banned in the Black Country by a High Court injunction. Full...		 1	 3
			 9	
View post				
	WolvesCouncil  12 Jul 2023 12:07			 1
	#Streetracing (https://twitter.com/search?q=%23Streetracing) is banned in the Black Country by a High Court injunction. Full...		 1	 1.2K
			 0	 0.41
			 3	 1
View post				
	WolverhamptonToday  22 Jun 2023 14:00			 4
	Street racing, also known as 'car cruising', is banned in the Black Country by an interim High Court injunction. It covers the whol...		 6	 4.3K
			 0	 4.6K
			 2	 0.26
				 4
View post				
	WolvesCouncil  22 Jun 2023 14:00			 1
	#Streetracing (https://twitter.com/search?q=%23Streetracing) is banned in the Black Country by a High Court injunction. Full...		 2	 2.2K
			 0	 0.23
			 2	 1

C. SECTION C - Evidence Filed on Behalf of The Defendant

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

DEFENDANTS' EVIDENCE

The Claimants confirm that as at the time of writing, 8 December 2023, no evidence, or contact has been received from any interested party or anyone purporting to be or indicating a wish to become, a Defendant in these proceedings.

D. SECTION D - Court Orders

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

CLAIM NO: KB-2022-BHM-000188

B E T W E E N:

**WOLVERHAMPTON CITY COUNCIL
DUDLEY METROPOLITAN BOROUGH COUNCIL
SANDWELL METROPOLITAN BOROUGH COUNCIL
WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

(as described in the particulars of claim dated 7 October 2022 as subsequently amended)

Defendants

**NOTICE OF MOVING – COURT ORDERS 22 DECEMBER 2022, 6 FEBRUARY 2023 and 13
FEBRUARY 2023**

Please note the sealed injunction order, sealed power of arrest (both dated 22 December 2022), the transcript of the judgment (22 December 2022) the transcript of the hearing (6 February 2023), the transcript of the judgment (13 February 2023), the order of 13 February 2023 which originally appeared at this point in the bundle for the review hearing 04 October 2023, have been moved to Volume Two and Volume Three of the bundle of documents for use at the hearing on 27 February 2024 to avoid any unnecessary duplication.

Claim Nos: KB-2022-BHM-000188
KB-2022-BHM-000221



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

KB-2022-BHM-000188

Mr Justice Ritchie
19 May 2023

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

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

Defendants

A N D B E T W E E N

BIRMINGHAM CITY COUNCIL

Claimant

and

(1) AHZI NAGMADIN

(2) JESSICA ELLEN ROBERTS

(4) RASHANI REID

(5) THOMAS WHITTAKER

(6) ARTHUR ROGERS

(7) ABC

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

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

**(10) PERSONS UNKNOWN WHO PARTICIPATE OR INTEND TO
PARTICIPATE IN STREET CRUISES IN BIRMINGHAM AS CAR
DRIVERS, MOTORCYCLE RIDERS OR PASSENGERS IN MOTOR
CARS OR ON MOTORCYCLES**

Defendants

ORDER

Before the Honourable Mr Justice Ritchie sitting at the High Court of Justice,
Birmingham District Registry, Priory Courts, 33 Bull Street, Birmingham, B4
6DS on 19 May 2023

UPON hearing:

- (i) Mr Singleton of counsel for the Claimants in Claim No. KB-2022-BHM-000188 (respectively the “Wolverhampton Claimants” and the “Wolverhampton claim”) and
- (ii) Mr Manning of counsel for the Claimants in Claim No. KB-2022-BHM-000221 (respectively “Birmingham CC” and the “Birmingham claim”),

AND UPON there being no appearance by any Defendant, and no other person having notified the Court, the Wolverhampton Claimants or Birmingham CC that they wished to be joined as a party or heard

AND UPON Birmingham CC’s application for an interim injunction and power of arrest dated 9 December 2022 pursuant to section 222 Local Government Act 1972 and section 130 Highways Act 1980 and the Wolverhampton Claimants’ like application dated 13 December 2022

AND UPON the Court reviewing the grant by the Honourable Mrs Justice Hill of Interim Injunctions and Powers of Arrest dated 22 December 2022 in both the Wolverhampton claim and the Birmingham claim, as required by para.5 of the said Injunctions and para.3 of the Orders of the Honourable Mr Justice Freedman sealed on 16 February 2023.

AND UPON the Court noting the Orders of Mrs Justice Hill sealed on 22 December 2022 in the Wolverhampton claim and the Birmingham claim giving directions and approving service by alternative means pursuant to CPR r.6.27 and CPR r.81.4 of the Interim Injunctions and Powers of Arrest sealed on 22 December 2022 and any further evidence, and noting the like provisions for alternative service contained in the Orders of Mr Justice Freedman sealed on 16 February 2023.

AND UPON the Court considering that in both the Wolverhampton claim and the Birmingham claim further clarification was necessary so as to define the particular categories of Defendant who are Person Unknown to whom the said Interim Injunctions and Powers of Arrest apply

AND UPON

- (i) the Wolverhampton claimants undertaking to file an Amended Claim Form and Amended Particulars of Claim to reflect the addition of the 4th Defendant and to specify the tort(s) and/or crime(s) that this Order is intended to prevent or inhibit, referred to above and by 4.00 pm on 9 June 2023

(ii) Birmingham CC undertaking to file a Re-Amended Claim Form and Further Re-Amended Particulars of Claim to reflect the addition to the proceedings of the 10th Defendant referred to above by 4.00 pm on 26 May 2023

AND UPON the Court concluding that, in the circumstances, it would be preferable to continue the said Interim Injunctions and Powers of Arrest granted by Mrs Justice Hill as amended in the form attached at Schedule 1 to this Order rather than to grant new interim injunctions and powers of arrest in order to avoid the potential for confusion that may be caused by the Claimants serving further interim orders by alternative means and difficulty in relation to the enforcement of any alleged breaches by reason of different interim injunctions being in force at different times

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

AND UPON the Wolverhampton claimants and Birmingham CC undertaking to inform the Court forthwith if the Supreme Court delivers judgment in the appeal known as *Wolverhampton City Council and others v London Gypsies and Travellers and others* UKSC/2022/0046

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

IT IS ORDERED THAT

Injunctions in force

1. In both the Wolverhampton claim and the Birmingham claim, the Interim Injunctions and Power of Arrest granted by the Honourable Mrs Justice Hill, sealed on 22 December 2022, shall remain in force in the amended form attached at Schedule 1 to this Order until the hearing of the claim unless varied or discharged by further Order of the Court. The said Amended Interim Injunctions and Powers of Arrest shall come into force immediately and be deemed served on the Defendants at 23.59 on the date upon which, in each case, the final step in paragraphs 11 and 13 have been complied with.

Permission to amend

2. (i) The Wolverhampton claimants shall have permission to file and serve an Amended Claim Form and Amended Particulars of Claim to add the 4th Defendant in the form set out above and to specify the tort(s) and/or crime(s) that this Order is intended to prevent or inhibit, by 4.00 pm on 9 June 2023.

(ii) Birmingham CC has permission to file and serve a Re-Amended Claim Form and Further Re-Amended Particulars of Claim to add the 10th Defendant in the form set out above, by 4.00 pm on 27th May 2023.

Case Management

3. There shall be the following further hearings set out below at which hearings the court will consider the Wolverhampton claim and the Birmingham claim together. For the avoidance of doubt, the Wolverhampton claim and the Birmingham claim have not been consolidated but it is convenient for them to be heard together as they raise similar issues.
4. A further case management hearing shall take place (time estimate 1 day) before a Judge of the High Court on the first open date after 10 July 2023.
 - (a) Such hearing may be held remotely if the Judge so directs.
 - (b) Further, the Judge may direct that the time estimate be amended.
 - (c) Not less than 7 days prior to the hearing the Wolverhampton claimants and Birmingham CC shall file with the Court case summaries to inform the Court of the current position in particular in relation to the awaited judgment of the Supreme Court in *Wolverhampton CC v London Gypsies and Travellers and others* [2022] UKSC/0046 and any current enforcement proceedings and Defendants to be named in connection with the interim injunction and/or the power of arrest.
 - (d) The Wolverhampton claimants shall take like steps to those identified at paragraph 11(1)-(8) below to publicise the date of such hearing; Birmingham CC shall take like steps to those identified at paragraph 13(1)-(8) to publicise the date of such hearing
 - (e) The Wolverhampton claimants and Birmingham CC have permission to file updating evidence not less than 7 days prior to the hearing. Alternative service of any such evidence may be effected by taking like steps to those set out at sub-paragraph (d) above.
5. At the said hearing the court will consider:
 - (i) if known, the effect of the Supreme Court judgment in *Wolverhampton City Council and others v London Gypsies and Travellers and others*;
 - (ii) appropriate directions, including a time estimate, for the hearing referred to at paragraph 6 below

6. There shall be a final hearing, or further review hearing, before a High Court Judge on the first open date after 1 October 2023. The nature of the hearing is to be determined at the case management conference referred to at paragraphs 4-5 above.
7. Any person served with a copy of, or affected by, this Order including, for the avoidance of doubt, the Amended Interim Injunctions and Powers of Arrest attached at Schedule 1 to this Order, may apply to the Court to vary or discharge it, on 48 hours written notice to the Wolverhampton claimants or Birmingham CC, whichever be the relevant claimant, at the applicable address set out at the foot of this Order. Further information is attached at Schedules 2 and 3 to this Order.

Service

8. In both the Wolverhampton claim and the Birmingham claim, and pursuant to CPR r.6.27 and CPR r.81.4, the steps that the Wolverhampton claimants and Birmingham CC have taken to serve the order of Freedman J sealed on 16 February 2023; notice of this hearing (including of the changed date) and the further evidence filed in advance of this hearing pursuant to para.3(d) and (e) of the order of Freedman J sealed on 16 February 2023 shall amount to good and proper service on the Defendants and each of them.
9. Personal service of this Order (including, for the avoidance of doubt, the Amended Interim Injunction and Power of Arrest attached at Schedule 1 to this Order) and the matters referred to at paragraph 4(d) and (e) above is dispensed with in the Wolverhampton claim, and is dispensed with in relation to the Eighth, Ninth and Tenth Defendants in the Birmingham claim pursuant to CPR rules 6.27 and 81.4(2)(c) and (d).
10. The Court will provide copies of this Order to the solicitors for the Wolverhampton claimants' and Birmingham CC (whose contact details are set out below) for service.
11. In the Wolverhampton claim, service of this Order shall be effected by:
 - (1) Issuing a media release highlighting the continuation of the Injunction and Power of Arrest, such release must provide:
 - (a) Details of the application and summarise the orders made;
 - (b) Any deadline for filing any documents by the Defendants;
 - (c) The date, time and location of any future hearings, if known

- (d) The addresses of the dedicated webpages maintained by the Claimants regarding car cruising;
- (e) The Claimants' contact details; and
- (f) Details of where and how copies of the Injunction, Power of Arrest, this Order, the Documents and the Evidence may be obtained.

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

by 23:59 on 26 May 2023

- (2) Placing on the Claimants' social media including Twitter, Facebook and Instagram links to the above media release regarding the granting of the High Court injunction and power of arrest and highlighting the introduction of the injunction and power of arrest by 26 May 2023
- (3) Updating the dedicated pages on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council and Walsall Council about the Injunction and Power of Arrest and this Order:
<https://www.wolverhampton.gov.uk/street-racing-injunction>
<https://www.dudley.gov.uk/residents/parking-and-roads/roads-highways-and-pavements/car-cruising-injunction>
https://www.sandwell.gov.uk/info/200284/roads_travel_and_parking/3231/street_racing
https://go.walsall.gov.uk/black_country_car_cruising_injunction
- (4) Such pages shall carry a direct link to the Injunction Order, the Power of Arrest, the Order of Freeman J, this Order, the Documents and the Evidence and be updated by 23:59 on 26 May 2023
- (5) Ensuring that the home (or landing) page of each of the Claimants' main websites have and retain a prominent direct link to the dedicated webpages referred to above by 23:59 on 26 May 2023

- (6) Ensuring that copies of the Injunction, the Power of Arrest and this Order are available at the front desks of the Claimants' main offices by 23:59 on 26 May 2023
- (7) Ensuring that the video previously uploaded to the video sharing website "You Tube" and the Claimants' websites and social media pages (including Instagram, Twitter and Facebook), now states that this Order has been made and the Injunction and Power of Arrest continue in force.

This may be done by uploading a fresh video (which must contain all the matters previously ordered by Hill J) or prominently adding text to the existing video (or the description of the existing video on any website or social media page) stating "Following a hearing on 19 May 2023 The Injunction and Power of Arrest continue in force"

The video and/or addition of text shall be uploaded or the text added by 23:59 on 26 May 2023

- (8) Requesting that West Midlands Police post on their website and Instagram, Twitter, and Facebook accounts, a link to the media release. Such request to be made by 23:59 on 26 May 2023
- (9) Continuing to cause to be displayed at regular intervals on the Claimants' electronic road signage the words "NEW HIGH COURT INJUNCTION PROHIBITING CAR CRUISING AND STREET RACING IN FORCE IN THIS AREA"; or words to the same effect; and thereafter
Maintaining official road signs (fixed, and temporary) throughout the Black Country Area in locations that are, or have been, hotspots car cruising activity stating "NEW HIGH COURT INJUNCTION PROHIBITING CAR CRUISING AND STREET RACING IN FORCE IN THIS AREA";

- 12. The Wolverhampton claimants shall file a witness statement confirming that the steps taken to effect service set out at paragraph 11, not less than 7 days before the date of the hearing referred to at paragraphs 4- 5 above. If paragraph 11 has not been fully complied with, the Wolverhampton claimants shall identify the deficiency and provide an explanation so that a Judge may consider whether to authorise retrospective alternative service, pursuant to CPR r. 6.27 & r. 81.4.

13. In the Birmingham claim, Birmingham CC shall be permitted to serve the documents referred to at paragraph 9 above on the Eighth Ninth and Tenth Defendants by the following alternative methods.

(1) Issuing a media release concerning the continuation of the Injunction and Power of Arrest, such release must provide:

- (a) a summary of this Order;
- (b) the date, time and location of any future hearings, if known
- (d) the addresses of the dedicated webpages maintained by the Claimant regarding street cruising;
- (e) The Claimants' contact details as set out below; and
- (f) Details of where and how copies of the interim injunction, power of arrest, this Order and the Claim Form and supporting documentation relied on by the Claimant may be obtained.

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

by 23:59 on 26 May 2023

(2) Placing on the Claimant's social media including Twitter, Facebook and Instagram links to the above media release

by 23:59 on 26 May 2023

(3) Updating the dedicated page on its website about the applications to the High Court for an injunction and power of arrest

<https://www.birmingham.gov.uk/streetcruiseapplication2022>

This webpage shall carry a direct link to the Injunction Order, the Power of Arrest, this Order, the Claim form and the supporting documentation referred to at (1) above

by 23:59 on 26 May 2023

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

by 23:59 on 26 May 2023

(5) Ensuring that copies of the said Amended Interim Injunction and Power of Arrest made by Hill J, and this Order, are available at the front desks of the Claimants' main offices
by 23:59 on 26 May 2023

(6) Ensuring that the web pages hosting the video previously uploaded to the video sharing website "You Tube" and the Claimants' websites and social media pages (including Instagram, Twitter and Facebook), now states that this Order has been made and the interim injunction and power of arrest continue in force.
by 23:59 on 26 May 2023

(7) Using its best endeavours to post a link to its dedicated webpage on any open Instagram account listed below and to send a private message containing a link to that webpage to the account holder of any private Instagram account, requesting that the said link be posted on the said account. The accounts referred to are:

- (a) @Forza_Birmingham
- (b) @Birminghamoutlaws
- (c) @midlands.modified
- (d) @mostwanted_brum
- (e) @tracksbirmingham_
- (f) @brum_traxx
- (g) @btec.forza_birmingham
- (h) @motorheads_uk

(8) Requesting that West Midlands Police post on their website and Instagram, Twitter, and Facebook accounts, a link to the media release such requests to be made by 23:59 on 26 May 2023

- (9) Maintaining the existing road signs informing people of:
- (a) the interim injunction and power of arrest, and
 - (b) the area in which they have effect, and
 - (c) how they can find out more information about this Claim and obtain copies of the Claimant's application and supporting documents in the current locations within the Claimant's local government area

14. This Order shall be deemed served on the Defendants at 23.59 on the date upon which, in each case, the final step in paragraph 13 has been complied with.

15. The Claimant shall file a witness statement confirming that the steps taken to effect service set out at paragraph 13, not less than 7 days before the date of the hearing referred to at paragraphs 4-5 above. If paragraph 13 has not been fully complied with the Claimant shall identify the deficiency and provide an explanation so that a judge may consider whether to authorise retrospective alternative service, pursuant to CPR r. 6.27 & r. 81.4.

Further matters

16. Without prejudice to the foregoing, any person affected by the Amended Interim Injunction or Power of Arrest in the Wolverhampton claim or the Birmingham claim may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the relevant Claimants' solicitors immediately (and in any event not less than 48 hours before the hearing of any such application) via the contact details set out below at the foot of this Order. Schedule 2 to this Order indicates the process which must be followed for any such application. Useful sources of support and information are listed in Schedule 3.

17. Any person applying to vary or discharge either Amended Interim Injunction or Power of Arrest must provide their full name and address, an address for service, and must also apply to be joined as a Named Defendant to the proceedings at the same time.

18. Any Defendant who fails to comply with paragraph 17 above shall not be permitted to defend these proceedings or take any further role in these proceedings without further order of the Court and shall be liable to have injunctive relief continued against them.

19. The Wolverhampton claimants and Birmingham CC otherwise have permission to apply to extend or vary the Amended Interim Injunctions and Powers of Arrest or for further directions.

Documents in the Claim and Application

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

Communications with Claimants and the Court

21. All communications to the Court about the Wolverhampton claim or the Birmingham claim (which should quote the case number) should be sent to:

Birmingham District Registry Civil Justice Centre
Priory Courts
33 Bull Street,
Birmingham B4 6DS
E: kb.birmingham@justice.gov.uk T: 0121 681 4441
F: 01264 785 131
DX: 701987 Birmingham 7

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

The Wolverhampton claimants' solicitors and their contact details are:

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

Birmingham CC's solicitors' contact details are:

Birmingham City Council Legal and Governance
Ref: LSCSY/HM/150673
PO Box 15992
Birmingham B2 2UQ
E: HousingLitigationTeam@birmingham.gov.uk
T: 0121 303 2808
DX: MDX 326401 Birmingham 87

23. Costs reserved.

SCHEDULE 1

The Wolverhampton claim

(i) Amended interim injunction

(ii) Amended power of arrest

The Birmingham claim

(iii) Amended interim injunction

(iv) Amended power of arrest

SCHEDULE 2 – STEPS TO VARY OR DISCHARGE THIS ORDER

If, in accordance with paragraph 16 above, any Defendant or any other person affected by this Order wishes to apply to vary or discharge this Order, to ensure effective case management by the Court the following indicative steps must be followed:

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

- (a) An N244 application form¹;
- (b) Written grounds (which may be contained in within the N244 application form or a separate document) for:
 - i. permission to bring the application; and
 - ii. the application (i.e. reasons for the proposed variation / discharge of the Order).
- (c) A witness statement(s) containing and/or appending all of the evidence to be relied upon in support of the application.

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

- (a) Send physical copies of the documents to the address at paragraph 21 of this Order; and/or
- (b) Speak to the Court to obtain an address to send electronic copies of the documents to.

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

- (a) Identify the relevant Claimants (the Wolverhampton Claimants or Birmingham CC); and then
- (b) Send physical copies of the documents to the relevant address at paragraph 22 of this Order; and/or

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

(c) Send electronic copies of the documents to the relevant e-mail address at paragraph 22 above.

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

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

6. Within 21 days, the Court shall decide:

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

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

SCHEDULE 3 – USEFUL REFERENCES AND RESOURCES

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

Bar Pro Bono Unit – A possible avenue for obtaining free legal advice and/or representation: <https://weareadvocate.org.uk/>

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

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

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

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

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

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

Claim No. KB-2022-BHM-000188



Original Order Mrs Justice Hill 22.12.2022

KB-2022-BHM-000188

Amended by Order of the Honourable Mr Justice Ritchie on 19 May 2023

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)**

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

Defendants

Addressed To:

**the Fourth Defendants being Persons Unknown being drivers, riders or
passengers in or on motor vehicle(s) who participate between the hours of
3:00pm and 7:00am in a gathering of 2 or more persons within the Black
Country Area shown on Plan A (attached) at which such Defendants engage
in motor racing or motor stunts or other dangerous or obstructive driving**

PENAL NOTICE

**IF YOU THE WITHIN NAMED PERSONS UNKNOWN, DO NOT
COMPLY WITH THIS ORDER YOU MAY BE HELD TO BE IN
CONTEMPT OF COURT AND IMPRISONED OR FINED, OR YOUR
ASSETS MAY BE SEIZED.**

**ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES
ANYTHING WHICH HELPS OR PERMITS ANY OF THE DEFENDANTS
TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN
CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE
THEIR ASSETS SEIZED**

IMPORTANT NOTICE TO THE DEFENDANTS

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

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

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

Before the Honourable Mr Justice Ritchie sitting at the High Court of Justice, Birmingham District Registry, Priory Courts, 33 Bull Street, Birmingham, B4 6DS on 19 May 2023.

Upon hearing Mr Singleton of counsel for the Claimants and there being no appearance by any other person and neither the Court nor the Claimants having received any notification that any other person wished to be joined as a party or heard.

And Upon the Claimants' application, by an Application Notice dated 7 October 2022 for an injunction pursuant to section 222 Local Government Act 1972 and section 130 Highways Act 1980.

And Upon the Court having granted an Injunction and Power of Arrest, by Order of the Honourable Mrs Justice Hill sealed on 22 December 2022.

And Upon the Court having further reconsidered the grant of the Injunction and Power of Arrest (following a previous review held by the Honourable Mr Justice Freedman on 6 and 13 February 2023), as directed by paragraph 2 of the Order of Freedman J sealed on 16 February 2023.

And Upon the court having exercised its discretion to grant injunctive relief pursuant to section 37(1) Senior Courts Act 1981.

And Upon the Court being satisfied for the purposes of s.27(3), Police and Justice Act 2006, that there is a significant risk of harm to a person or persons from the conduct prohibited by the Injunction Order and that the Power of Arrest should therefore be continued.

And Upon the Court noting the order of the Honourable Mr Freedman sealed on 16 February 2023 giving directions and approving service by alternative means pursuant to CPR r.6.27 and CPR r.81.4 of: that order; and further evidence.

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

And Upon the Claimants renewing their undertaking to inform the Court forthwith if the Supreme Court deliver judgment in the appeal known as *Wolverhampton City Council and others (Respondents) v London Gypsies and Travellers and others (Appellants)* [2022] UKSC/0046.

And Upon the Claimants reconfirming that this Order is not intended to prohibit lawful motorsport taking place on private land where planning permission has been

granted (or is not required) and such activities take place under an approved code or licence from a recognised regulatory body.

And Upon the Court considering that further clarification was necessary as to the particular categories of Defendant who are Person Unknown to whom this injunction and power of arrest applies

And further upon the Claimant undertaking, and being given permission, to file an Amended Claim Form and an Amended Particulars of Claim to reflect the addition to the proceedings of the Fourth Defendant referred to above and to specify the tort(s) and/or crime(s) that this Order is intended to prevent or inhibit. Such amendments to be filed by 4.00pm, 9 June 2023 and served by the same date by adopting like measures to those set out at paragraphs 11 (3) & (6) in the Combined Directions Order.

IT IS ORDERED THAT:

Injunction in force

- 1 The Injunction and Power of Arrest granted by the Honourable Mrs Justice Hill, sealed on 22 December 2022, shall remain in force save that paragraph 1 of that Order be amended as set out below until the hearing of the claim unless varied or discharged by further Order of the Court

IT IS FORBIDDEN for any of the Fourth Defendants being a driver, rider or passenger in or on a motor vehicle 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 such Defendants engage in motor racing or motor stunts or other dangerous or obstructive driving.

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

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

A Power of Arrest pursuant to section 27 Police and Criminal Justice Act 2006 shall apply to paragraph 1 of this Order.

Definitions

- 2 In this Order the following definitions have been applied:
- (1) “the Injunction” means the Order of Hill J sealed on 23 December 2022 and as amended by this Order
 - (2) “the Power of Arrest” means the Power of Arrest, sealed on 23 December 2022 and as amended by this Order
 - (3) “the Interim Relief Application” - the Application Notice of 13 December 2022, including the draft Injunction Order referred to therein.
 - (4) “the Alternative Service Application” – the Application Notice of 7 October 2022, seeking permission for alternative service of Claim Form.
 - (5) “the Applications” – the Interim Relief Application, the Alternative Service Application and the application for a final injunction issued on 13 October 2022.
 - (6) “the Documents”
 - (a) Notice of Hearing and a sealed copy of this Order
 - (b) Part 8 Claim Form;
 - (c) Particulars of Claim
 - (d) N16A application for an Injunction;
 - (e) Draft Injunction Order
 - (f) Draft Power of Arrest
 - (g) The Interim Relief Application;
 - (h) The Alternative Service Application.
 - (7) “the Evidence” materials set out at Schedule A below
 - (8) “the Combined Directions Order” means the order made on 19 May 2023 by Ritchie J giving further directions for this matter and the case of Claim No. KB-2022-BHM-000221 (respectively “Birmingham CC” and the “Birmingham claim”).

Commencement:

- 3 This Amended Order shall come into force immediately and be deemed served on the Defendants at 23.59 on the date upon which, in each case, the final step in paragraph 11 of the Combined Directions Order have been complied with.

Further Matters

- 4 Without prejudice to the foregoing, any person affected by this Amended Interim Injunction or amended Power of Arrest may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Claimants’ solicitors immediately (and in any event not less than 48 hours before the hearing of any such application).

- 5 Further information on how to make such application and useful sources of information are set out in the Combined Directions Order.
- 6 The costs of this application are reserved.

SCHEDULE A

Please see:

- (1) Material contained in the Bundle of Evidence in support of Application for an Injunction as set out at Parts, B, C, D, E, F, G, H, I and K of the attached Index
- (2) Material contained in the “Bundle of Documents for Review Hearing 15 May 2023 (sic)” in support of Application for an Injunction as set out at Parts B, C, and D of the attached Index
- (3) Witness statements of:
 - (a) Tenth witness statement of Paul Brown, dated 9 May 2023
 - (b) Eleventh witness statement of Paul Brown, dated 17 May 2023

Urgent Application For Interim Relief

- | | | |
|----|---|------------|
| 1. | Application For Urgent Relief December 2022.pdf | p 1 - p 64 |
|----|---|------------|

A. SECTION A - STATEMENTS OF CASE

- | | | |
|-----|--|-------------|
| 1. | WCC & OTHERS v PERSONS UNKNOWN PART 8 CLAIM FORM | A 1 - A 4 |
| 2. | WCC & Others v Persons Unknown PARTICULARS OF CLAIM (CPR Part 8) 7 October 2022 | A 5 - A 17 |
| 3. | Map of Black Country Area | A 18 |
| 4. | WCC & Others v Persons Unknown Application For Injunction FORM N16a | A 19 - A 20 |
| 5. | Annex to Form N16A - Index to bundle of evidence (not including statements of case) | A 21 - A 26 |
| 6. | Map of Black Country Area | A 27 |
| 7. | WCC & Others v Persons Unknown - Draft INJUNCTION order | A 28 - A 40 |
| 8. | Map of Black Country Area | A 41 |
| 9. | WCC & Others v Persons Unknown - Draft POWER OF ARREST | A 42 - A 44 |
| 10. | Map of Black Country Area | A 45 |
| 11. | Form N244 Application Notice Alternative Service 7 October 2022 | A 46 - A 50 |
| 12. | WCC & Others v Persons Unnkown - Draft ORDER Permitting ALTERNATIVE SERVICE of injunction application | A 51 - A 58 |
| 13. | SCHEDULE A of Draft Order for Alternative Service - Index to bundle of evidence (not including statements of case) | A 59 - A 64 |
| 14. | STATEMENT OF PAUL BROWN 7 October 2022 | A 65 - A 72 |

B. SECTION B - Global Overarching Statements

- | | | |
|-----|---|-------------|
| 1. | Statement of Adam Sheen 4 October 2022 | B 1 - B 3 |
| 2. | Overarching Statement of Pardip Nagra (For Wolverhampton) 19 July 2022 | B 4 - B 35 |
| 3. | EXHIBIT PN1 | B 36 |
| 4. | Exhibit PN1 - Statement of Lisa Fox (From 2014 Application 01 11 2013_Redacted | B 37 - B 40 |
| 5. | EXHIBIT PN2 | B 41 |
| 6. | Exhibit PN2 - Statement of Peter James (From 2014 Application 09 11 2013_Redacted | B 42 - B 44 |
| 7. | EXHIBIT PN3 | B 45 |
| 8. | Exhibit PN3 - Statement of Carl Yeomans (From 2014 Application 07 11 2013_Redacted | B 46 - B 49 |
| 9. | EXHIBIT PN4 | B 50 |
| 10. | Exhibit PN4 - Statements of David Clark (From 2014 Application) 12 03 2014 | B 51 - B 70 |
| 11. | Note for Exhibit DPC1 (Exhibit of David Clarke statement from 2014 application) | B 71 |
| 12. | EXHIBIT PN5 | B 72 |
| 13. | Exhibit PN5 - Statement of Lisa Parmar (From 2014 Application 22 05 2014_Redacted | B 73 - B 89 |
| 14. | EXHIBIT PN6 | B 90 |
| 15. | Exhibit PN6 - Statement of Lydia Pulford (From 2014 Application 11 11 2013_Redacted | B 91 - B 93 |

16.	EXHIBIT PN7	B 94
17.	Exhibit PN7 - Statement of Fanella Bird (From 2014 Application) 23.11.2014	B 95 - B 96
18.	Exhibit PN7 Statement of Fanella Bird (From 2014 Application) 23 11 2014	B 97
19.	EXHIBIT PN8	B 98
20.	Exhibit PN8 - Statement of PC J Hartford (From 2014 Application) 16 11 2013	B 99 - B 100
21.	EXHIBIT PN9	B 101
22.	Exhibit PN9 - Statement of Richard Hardy (From 2014 Application) 06 11 2013_Redacted	B 102 - B 104
23.	EXHIBIT PN10	B 105
24.	Exhibit PN10 - Statement of Police Inspector Julie Mason (From 2014 Application) 23 07 2014	B 106 - B 110
25.	EXHIBIT PN11 - (Video Footage Available Separately)	B 111
26.	EXHIBIT PN12	B 112
27.	Exhibit PN12 - E-mail from Lisa Fox 17 April 2021	B 113
28.	EXHIBIT PN13	B 114
29.	Exhibit PN13 - Express & Star Article 12 04 22 direct print from Website	B 115 - B 127
30.	Exhibit PN13 Print Friendly Version of E & S Article 12 04 2022	B 128 - B 130
31.	EXHIBIT PN14	B 131
32.	Exhibit PN14 - Letter from Councillor Leach to ASB Team 05 22	B 132
33.	EXHIBIT PN15	B 133
34.	Exhibit PN15 - Letter from Pat McFadden MP 31 05 22	B 134
35.	EXHIBIT PN16	B 135
36.	Exhibit PN16 - Letter From Nicola Richards MP 25 04 22	B 136
37.	EXHIBIT PN17	B 137
38.	Exhibit PN17 - Version 1 Print Friendly Version of story published on E & S Website 15 08 2018	B 138 - B 143
39.	Exhibit PN17 Version 2 print from E & S Website 15 08 2018	B 144 - B 161
40.	EXHIBIT PN18	B 162
41.	Exhibit PN18 - Essex Live Article 5 April 2021 (Print Friendly Version)	B 163 - B 165
42.	Exhibit PN18 - Essex Live News 5 April 2021 - Report of Thurrock Car Meet From Essex News Website	B 166 - B 171
43.	EXHIBIT PN19	B 172
44.	Exhibit PN19 - Media release July 2022	B 173 - B 174
45.	Overarching Statement of Chief Superintendent Ian Green (West Midlands Police) 19 07 22	B 175 - B 177
46.	Overarching Statement of PC Mark Campbell (West Midlands Police) 15 07 22	B 178 - B 214
47.	EXHIBIT MRC1 - Video Footage (Available Separately)	B 215
48.	EXHIBIT MRC2 - Video Footage (Available Separately)	B 216
49.	EXHIBIT MRC3	B 217
50.	Exhibit MRC3 - Statement of PC Mark Campbell 13 July 2022	B 218 - B 225
51.	Witness Statement of Paul Brown (Communications Manager) (For Wolverhampton)16 September 2022	B 226 - B 228

52.	STREET RACING COMMUNICATIONS PLAN	B 229 - B 237
53.	Comms Plan Appendix 1	B 238
54.	Comms Plan - APPENDIX 1	B 239 - B 240
55.	Comms Plan Appendix 2	B 241
56.	Comms Plan - APPENDIX 2	B 242 - B 243
57.	Comms Plan Appendix 3	B 244
58.	Comms Plan - APPENDIX 3	B 245 - B 246
59.	Comms Plan Appendix 4	B 247
60.	Comms Plan - APPENDIX 4	B 248 - B 249
61.	Comms Plan Appendix 5	B 250
62.	Comms Plan - APPENDIX 5	B 251 - B 252
63.	Comms Plan Appendix 6	B 253
64.	Comms Plan - APPENDIX 6	B 254
65.	Comms Plan Appendix 7	B 255
66.	Comms Plan - APPENDIX 7	B 256 - B 258
67.	Comms Plan Appendix 8	B 259
68.	Comms Plan - APPENDIX 8	B 260 - B 261
69.	Comms Plan Appendix 9	B 262
70.	Comms Plan - APPENDIX 9	B 263 - B 265
71.	Comms Plan Appendix 10	B 266
72.	Comms Plan - APPENDIX 10	B 267 - B 268
73.	Comms Plan Appendix 11	B 269
74.	Comms Plan - APPENDIX 11	B 270 - B 271
75.	Comms Plan Appendix 12	B 272
76.	Comms Plan - APPENDIX 12	B 273 - B 274
77.	Comms Plan Appendix 13 -	B 275
78.	Comms Plan - APPENDIX 13	B 276 - B 277
79.	Comms Plan Appendix 14	B 278
80.	Comms Plan - APPENDIX 14	B 279 - B 280
81.	Comms Plan Appendix 15	B 281
82.	Comms Plan - APPENDIX 15	B 282 - B 283
83.	Comms Plan Appendix: "Digital Signage"	B 284
84.	Comms Plan - APPENDIX DIGITAL SIGNAGE	B 285 - B 289
85.	Comms Plan Appendix "Signage 1"	B 290
86.	Comms Plan - Appendix signage 1 - Dudley Existing Signs	B 291
87.	Comms Plan Appendix "Signage 2"	B 292
88.	Comms Plan - Appendix signage 2 - Dudley Existing and Proposed Signs	B 293 - B 296
89.	Comms Plan Appendix "Signage 3"	B 297
90.	Comms Plan - Appendix Signage 3	B 298 - B 300
91.	Comms Plan Appendix "Signage 4"	B 301
92.	Appendix signage 4 - Sandwell Existing and Proposed Signs	B 302 - B 305

93.	Comms Plan Appendix "Signage 5"	B 306
94.	Comms Plan - Appendix signage 5 - Walsall Existing Signs	B 307
95.	Comms Plan Appendix "Signage 6"	B 308
96.	Comms Plan - Appendix signage 6 - Walsall Existing and Proposed Signs	B 309 - B 311
97.	Comms Plan Appendix "Signage 7"	B 312
98.	Comms Plan - Appendix signage 7 - Wolverhampton Existing Signs	B 313 - B 322
99.	Comms Plan Appendix "Signage 8"	B 323
100.	Comms Plan - Appendix signage 8 - Wolverhampton Existing and Proposed Signs	B 324 - B 327

C. SECTION C- Overarching Statements of Professionals for Each Claimant Local Authority

1.	Statement of Kathryn Jones 13 07 22 (For Dudley)	C 1 - C 5
2.	Witness Statement of Pardip Sandhu 27 September 2022	C 6 - C 12
3.	Exhibit Cover - Exhibit PS1 (Pardip Sandhu 27.9.2022)	C 13
4.	Exhibit PS1 o Statement of Pardip Sandhu 2022 car crashing incidents 2021 - 2022 with date of incidents	C 14 - C 36
5.	Exhibit Cover - Exhibit PS2 (Pardip Sandhu 27.9.2022)	C 37
6.	Statement of Steve Gittins 08 09 22 (For Walsall)	C 38 - C 44
7.	Exhibit Cover SJG1	C 45
8.	Exhibit SJG1 [Steve Gittins] (for Walsall)_Redacted	C 46
9.	Exhibit Cover SJG2	C 47
10.	Exhibit SJG2 [Steve Gittins] (for Walsall)_Redacted	C 48
11.	Exhibit Cover SJG3	C 49
12.	Exhibit SJG3 [Steve Gittins] (For Walsall)	C 50 - C 51
13.	Statement of Police Sergeant Lee Plant 15 07 22 (For Wolverhampton)	C 52 - C 53
14.	(MG11 Format) Police Sergeant Lee Plant Street racing - Wolverhampton	C 54 - C 74
15.	Statement of Police Constable Jonathan Edwards 12 05 22 (For Dudley)	C 75 - C 86
16.	Statement of Police Sergeant Richard Phillips 29 06 22 (For Sandwell)	C 87 - C 90
17.	Statement Police Inspector Phil Upton 09 06 22 (For Walsall)	C 91 - C 93
18.	Second Statement of Police Inspector Phil Upton 04 09 22 (For Walsall)	C 94 - C 104

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

1.	Witness Statement of Dharminder Dhaliwal (Wolverhampton) Tier 3	D 1 - D 2
2.	Witness Statement of Margaret Clemson (Wolverhampton) Tier 3	D 3 - D 4
3.	Witness Statement of Nicki Wellings (Wolverhampton) Tier 3	D 5
4.	Witness Statement of Taylor Harvey-Beardsmore (Wolverhampton) Tier 3	D 6
5.	Witness Statement of Teja Sidhu (Wolverhampton) Tier 3	D 7
6.	Witness Statement of Teresa Welburn (Wolverhampton) Tier 3	D 8
7.	Witness Statement of Jennifer Bateman 26.05.2022 (for Wolverhampton)	D 9 - D 12

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

1.	Signed statement of James Morris MP (For Dudley)	E 1 - E 6
2.	Statement of Stacy Hewerdine - Waterfront Security 10-05-22 (For Dudley)	E 7 - E 12
3.	Exhibit Cover - EXHIBIT SH1 [Stacy Hewedine] (For Dudley) (Clearer Version of Exhibit SH1)	E 13
4.	EXHIBIT SH1 (Waterfront Car Park) [Stacy Hewerdine] (For Dudley) (Clearer Version)	E 14
5.	Signed statement of Richard Hubbard- Harris - Showcase 10-05-22 (For Dudley)	E 15 - E 22
6.	Exhibit Cover RHH1 [Richard Hubbard-Harris] (For Dudley) (Clearer Version of Exhibit RHH1)	E 23
7.	EXHIBIT RHH1 Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 24
8.	EXHIBIT RHH1 Front Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 25
9.	EXHIBIT RHH1 Rear Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 26
10.	Signed 2nd stmt of Richard Hubbard-Harris dated 14-09-22	E 27 - E 33
11.	Exhibit RHH2 - (Video Footage Available Separately)	E 34
12.	Exhibit RHH3 - Cover Sheet	E 35
13.	EXHIBIT RHH3	E 36 - E 40
14.	Exhibit RHH4 - Cover Sheet	E 41
15.	EXHIBIT RHH4	E 42
16.	Exhibit RHH5 - Cover Sheet	E 43
17.	EXHIBIT RHH5	E 44
18.	Exhibit RHH6 - Cover Sheet	E 45
19.	EXHIBIT RHH6	E 46 - E 47
20.	Exhibit RHH7- Cover Sheet	E 48
21.	EXHIBIT RHH7	E 49
22.	Exhibit RHH8 - Cover Sheet	E 50
23.	EXHIBIT RHH8	E 51
24.	Signed statement of John Slater-Kiernan - Shell Garage 11-05-22 (For Dudley)	E 52 - E 56
25.	Exhibit Cover JSK1 [John Slater-Kiernan] (For Dudley)	E 57
26.	Statement of Chris Southall - Tesco 11-05-22 (For Dudley)	E 58 - E 62

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

1.	Witness Statement of Shiela Powell (Sandwell) 10.06.2022_Redacted	F 1 - F 2
2.	Witness Statement of Ronald Hill (Sandwell) 31 05 22	F 3
3.	Witness Statement of Nicki Wellings (Wolverhampton) 11 06 22	F 4
4.	Witness Statement of John Gallagher (Sandwell) 31.03.2022_Redacted	F 5 - F 6
5.	Witness Statement of Donata Halasa (Sandwell) 10.06.2022_Redacted	F 7 - F 8
6.	Letter from Nicola Richards MP 25 04 22	F 9

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

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

H. SECTION H - Bundle May 2021

1.	May 2021 Bundle.pdf	H 1 - H 420
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I. SECTION I - Supplemental Evidence Bundle as filed 14 December 2022

1.	Supplemental Evidence Bundle	I 1 - I 24
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J. SECTION J - COURT ORDERS

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

K. SECTION K - Claimants' Evidence re: Compliance with Court Orders and Updating Evidence

1.	Witness Statement Pardip Nagra 23 Jan 2023	K 1 - K 3
2.	Witness Statement of PC Mark Campbell 27 January 2023	K 4 - K 7
3.	Statement of Paul Brown re Injunction Service Requirements 27 01 2023	K 8 - K 18
4.	Exhibit Cover Exhibit PB3A	K 19
5.	EXHIBIT PB3A	K 20 - K 31
6.	Exhibit Cover Exhibit PB3B	K 32
7.	EXHIBIT PB3B	K 33 - K 36
8.	Exhibit Cover Exhibit PB3C	K 37
9.	EXHIBIT PB3C	K 38 - K 39
10.	Exhibit Cover Exhibit PB3D	K 40
11.	EXHIBIT PB3D	K 41 - K 44
12.	Exhibit Cover Exhibit PB3E	K 45
13.	EXHIBIT PB3E	K 46
14.	Exhibit Cover Exhibit PB3F	K 47
15.	EXHIBIT PB3F	K 48 - K 52
16.	Exhibit Cover Exhibit PB3G	K 53
17.	EXHIBIT PB3G	K 54 - K 55
18.	Exhibit Cover Exhibit PB3H(i)	K 56
19.	Exhibit PB3H(i) - Part 1 of Statement of Anrdew Clarke (Sandwell MBC)	K 57 - K 60

20.	Exhibit PB3H(i) - Part 2 Exhibit Cover AC1	K 61
21.	Exhibit PB3H(i) - Part 3 Exhibit AC1	K 62 - K 78
22.	Exhibit PB3H(i) - Part 4 Exhibit Cover AC2	K 79
23.	Exhibit PB3H(i) - Part 5 Exhibit AC2	K 80 - K 82
24.	Exhibit Cover Exhibit PB3H(ii)	K 83
25.	Exhibit PB3H(ii) - Statement of Nick Hooper with Exhibits (Dudley MBC)	K 84 - K 102
26.	Exhibit Cover Exhibit PB3H(iii)	K 103
27.	Exhibit PB3H(iii) - Witness Statement of Tim Philpot and Exhibits (Wolverhampton City Council)	K 104 - K 114
28.	Exhibit Cover Exhibit PB3H(iv)	K 115
29.	Exhibit PB3H(iv) - Part 1 Witness Statement of Steven Gittins (Walsall MBC)	K 116 - K 120
30.	Exhibit PB3H(iv) - Part 2 Exhibit Cover SJG4	K 121
31.	Exhibit PB3H(iv) - Part 3 Exhibit SJG4 Car Cruising Replacement signs 24.1.23	K 122 - K 138
32.	Receipt Filing Paul Brown Witness Statement 27 01 23 and Exhibit Bundle (split into two parts due to file size) 27 01 23.pdf	K 139

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2022-BHM000188

B E T W E E N:

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

Claimants

and

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

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

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

Defendants

BUNDLE OF DOCUMENTS FOR REVIEW HEARING 15 MAY 2023

A. SECTION A - Statements of Case

- | | | |
|----|--|-----------|
| 1. | Wolverhampton CC & Ors v Persons Unknown - Statement of Case for Hearing 15 May 2023 | A 1 - A 7 |
|----|--|-----------|

B. SECTION B - Evidence Filed on Behalf of the Claimant

- | | | |
|-----|---|---------------|
| 1. | Witness Statement Pardip Nagra (Wolverhampton City Council) 02 May 2023 | B 1 - B 3 |
| 2. | Statement of Mark Wilson (Dudley MBC) 25 April 2023 | B 4 - B 6 |
| 3. | Statement of Pardip Sandhu (Sandwell MBC) 3 May 2023 | B 7 - B 17 |
| 4. | Witness Statement of Steve Gittins (Walsall MBC) 03 May 2023 | B 18 - B 21 |
| 5. | Statement of PC Mark Campbell 02 May 2023 | B 22 - B 25 |
| 6. | 7th Statement of Paul Brown 27 2 23 | B 26 - B 33 |
| 7. | Exhibit Cover PB7A | B 34 |
| 8. | EXHIBIT PB7A | B 35 - B 45 |
| 9. | Exhibit Cover PB7B | B 46 |
| 10. | EXHIBIT PB7B | B 47 - B 61 |
| 11. | Exhibit Cover PB7C | B 62 |
| 12. | EXHIBIT PB7C | B 63 - B 67 |
| 13. | Exhibit Cover PB7D | B 68 |
| 14. | EXHIBIT PB7D | B 69 - B 70 |
| 15. | Exhibit Cover PB7E | B 71 |
| 16. | EXHIBIT PB7E | B 72 - B 78 |
| 17. | Exhibit Cover PB7F | B 79 |
| 18. | EXHIBIT PB7F | B 80 - B 88 |
| 19. | 8th Statement of Paul Brown 28 April 23 | B 89 - B 93 |
| 20. | Exhibit Cover PB8A | B 94 |
| 21. | EXHIBIT PB8A | B 95 - B 108 |
| 22. | 9th Witness Statement of Paul Brown | B 109 - B 112 |
| 23. | EXHIBIT PB9A | B 113 - B 143 |

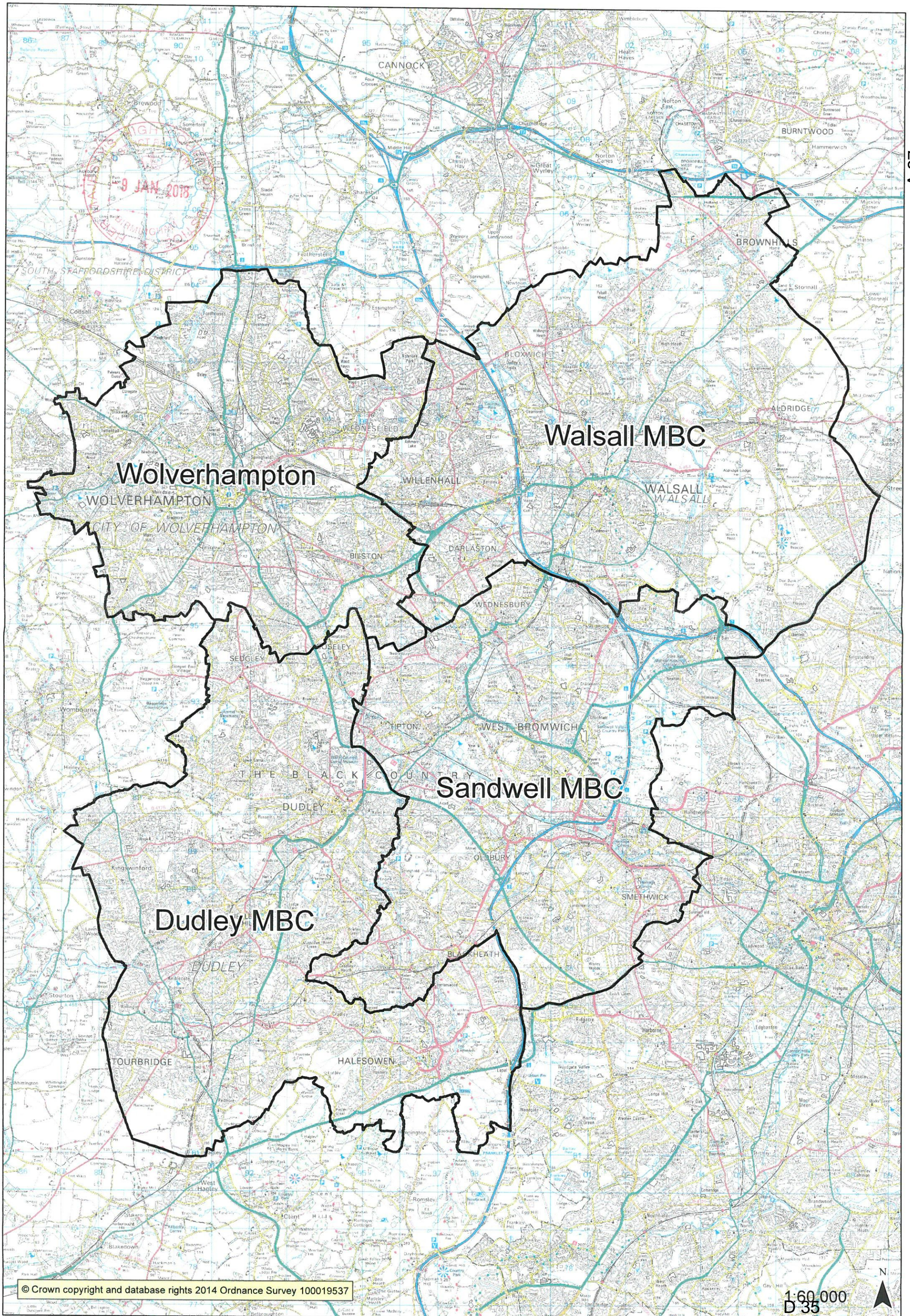
C. SECTION C - Evidence Filed on Behalf of The Defendant

- | | | |
|----|--|-----|
| 1. | Confirmation of No Evidence from Any Defendant | C 1 |
|----|--|-----|

D. SECTION D - Court Orders, Judgments and Transcripts of Hearings

- | | | |
|----|--|-------------|
| 1. | SEALED INJUNCTION ORDER (Order of Hill J) 22.12.22 Wolverhampton City Council and others v Unknown KB-2022-BHM-000188 | D 1 - D 24 |
| 2. | SEALED POWER OF ARREST (Order of Hill J) 22.12.22 KB-2022-BHM-000188 | D 25 - D 27 |
| 3. | Wolverhampton City Council v Persons Unknown and Others: KB- 2022-BHM 000188 (21.12.22) - Approved judgment of Hill J | D 28 - D 45 |
| 4. | Order 13 02 23 (sealed 16 February 23) Wolverhampton City Council v Persons Unknown and Others 2023 KB-2022-BHM-000188 | D 46 - D 59 |
| 5. | Schedule A Index (Schedule to Order Sealed 16 February 2023) | D 60 - D 66 |
| 6. | Plan A (attached to order 16 February) | D 67 |
| 7. | TRANSCRIPT of JUDGMENT 13 February 2023 - Wolverhampton City Council v Persons Unknown (KB-2022-BHM-000188) | D 68 - D 84 |

- | | | |
|----|---|--------------|
| 8. | TRANSCRIPT of HEARING 06 February 2023 Wolverhampton City Council & Ors v Persons Unknown - KB.2022.BHM-00188 | D 85 - D 143 |
| 9. | Hearing Notice - Hearing: 15 May 2023 at 10.30 a.m. | D 144 |



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

Claim no: KB-2022-BHM-000188



B E T W E E N:

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

KB-2022-BHM-000188

AND

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

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

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

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

Defendants

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

POWER OF ARREST

Under section 27 Police and Criminal Justice Act 2006

Amended by Order of Ritchie J on 19 May 2023

SEAL

WOLVERHAMPTON CITY COUNCIL & OTHERS v PERSONS UNKNOWN

The court orders that a power of arrest under section 27 Police and Criminal Justice Act 2006 applies to the following paragraph of an order made on 22 December 2022 and amended on 19 May 2023

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

(Where marked * delete as appropriate)

IT IS FORBIDDEN for any of the Fourth Defendants being a driver, rider or passenger in or on a motor vehicle 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 such Defendants engage in motor racing or motor stunts or other dangerous or obstructive driving.

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

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

POWER OF ARREST

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

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

This Power of Arrest

Originally came into effect on 12.01 a.m. (00:01 hours) on 22 December 2022 and remains in force with the amendment and shall continue until 11:59 pm (23:59 hours) on 21 December 2023, unless it is extended, varied or discharged by further order of the court.

WOLVERHAMPTON CITY COUNCIL & OTHERS v PERSONS UNKNOWN

**Note to the
Arresting Officer**

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

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

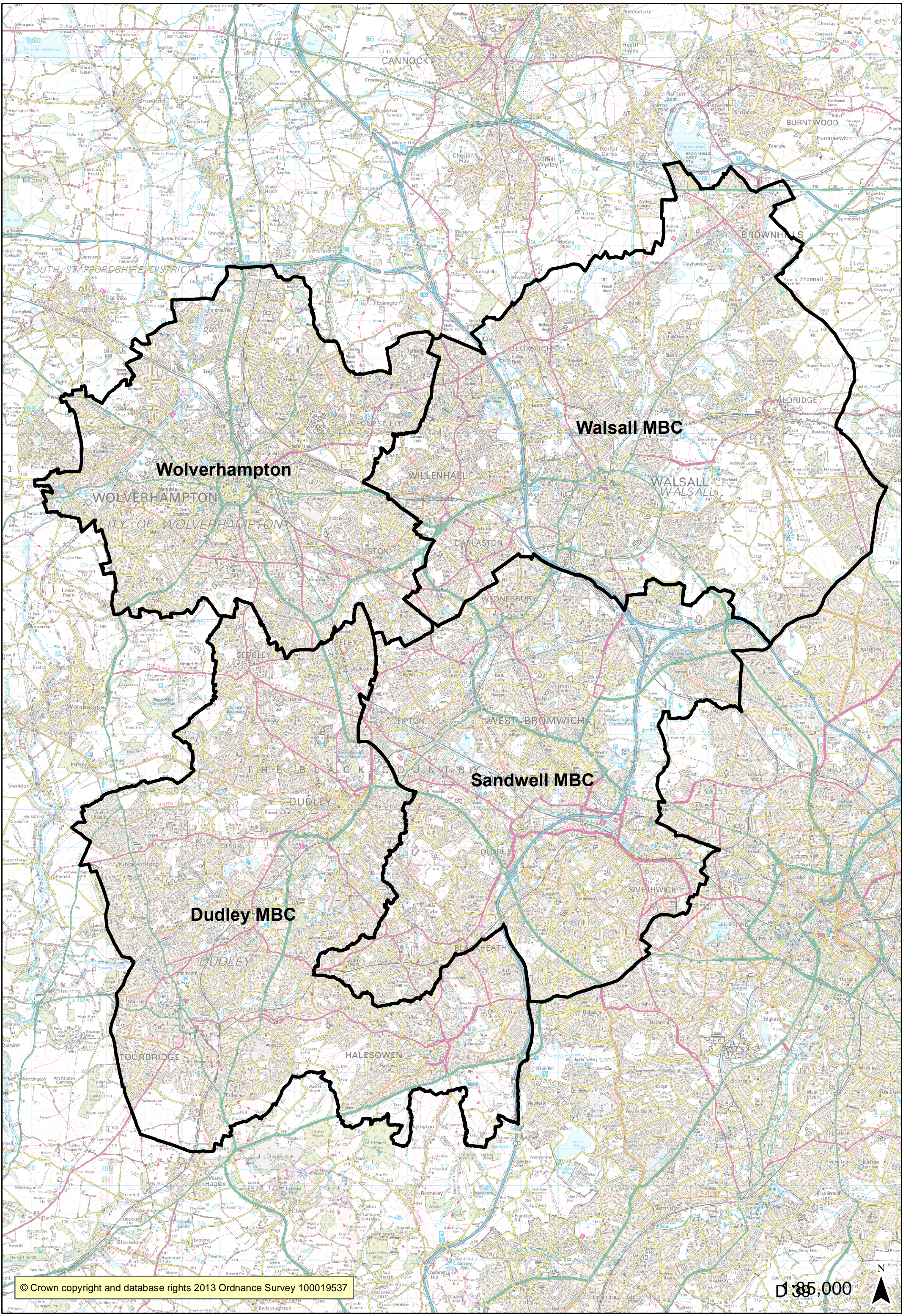
Ordered by

The Honourable Mrs Justice Hill & **The Honourable Mr Justice Ritchie**

On

22 December 2022 & **19 May 2023**

Signed: Ritchie J
19 May 2023



7 June, 2023

CITY OF WOLVERHAMPTON COUNCIL

BY COURIER

FAO: The Court Manager
Birmingham High Court
Civil Justice Centre
Priory Courts
33 Bull Street
Birmingham, B4 6DS

Tracey Christie

Head of Legal Services

Your Ref: KB-2022-BHM-000188

My Ref: AS/LIJ017753P

Dear Sirs

Re: Wolverhampton City Council, Dudley MBC, Sandwell MBC and Walsall MBC v Persons Unknown

Claim Number: KB-2022-BHM-000188

Application to Renew Black Country Car Cruising Injunction

In accordance with the order of the Honourable Mr Justice Ritchie (19 May 2023) which required the Claimants to serve amended statements of case by 4 p.m. on 9 June 2023, please find enclosed herewith a copy of:

1. The Claimants' amended Part 8 Claim Form (6 June 2023); and
2. The Claimants' amended Particulars of Claim (6 June 2023).

I confirm that a copy of these documents has also been filed electronically via CE-File today (7 June 2023).

Should you have any queries in the matter, please do not hesitate to contact me.

Yours faithfully



Adam Sheen

Solicitor-Advocate (Civil & Criminal)

For and on behalf of
Head of Legal Services

Direct: 01902 554926

Email: adam.sheen@wolverhampton.gov.uk

City of Wolverhampton Council
Legal Services, Civic Centre, St Peters Square
Wolverhampton, WV1 1RG, DX 744350 Wolverhampton 27

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14 June, 2023

CITY OF WOLVERHAMPTON COUNCIL

The Court Manager
High Court of Justice, Birmingham
5th Floor, Priory Courts
33 Bull Street
Birmingham
B4 6DS

Tracey Christie
Head of Legal Services

Your Ref: KB-2022-BHM000188
My Ref: AS/LIJ017753P

Dear Sir,

Re: Wolverhampton City Council, Dudley MBC, Sandwell MBC and Walsall MBC v Persons Unknown

Claim Number: KB-2022-BHM000188

Previous Hearing: 19 May 2023 Before Mr Justice Ritchie

At the above hearing, the honourable Mr Justice Ritchie, ordered that a further hearing in the matter be listed on the first open date after 10 July 2023.

I should be grateful if you would tell me if such hearing has been listed and provide details of the time, date and location of the Court venue for this next hearing.

I thank you for your attention in this matter and look forward to hearing from you soon.

Yours faithfully



Adam Sheen

Solicitor-Advocate (Civil & Criminal)

For and on behalf of
Head of Legal Services

Direct: 01902 554926

Email: adam.sheen@wolverhampton.gov.uk

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Legal Services, Civic Centre, St Peters Square
Wolverhampton, WV1 1RG, DX 744350 Wolverhampton 27

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HM Courts &
Tribunals Service

Birmingham District Registry

Birmingham Civil and Family
Justice Hearing Centre, Priory
Courts, 33 Bull Street,
Birmingham B4 6DS, DX. 701987

Wolverhampton City Council Legal Services

T 0121 681 4441, 0121 681 3181

Date: 03-07-2023

Dear Sir / Madam,

RE: KB-2022-BHM-000188 Wolverhampton City Council and others v Unknown

Please note that this is due to be listed for a further Case Management Conference as per Paragraph 3 of the Order from The Honourable Mr Justice Ritchie dated the 19th May 2023. The matter is with the Diary Managers team, however the lack of availability with High Court Judges over the summer is providing problematic. Please note that this matter has not been forgotten and we are actively trying to fix a hearing date.

Yours faithfully,

Toby Winter

Birmingham District Registry

26 July 2023

CITY OF WOLVERHAMPTON COUNCIL

BY UPLOAD TO CE-FILE

The Clerk to Her Honour Judge Emma Kelly,
Designated Civil Judge for Birmingham,
Birmingham Civil Justice Centre
Priory Courts
33 Bull Street
Birmingham
B4 6DS

Tracey Christie

Head of Legal Services

Your Ref: KB-2022-BHM-000188

My Ref: AS/LIJ017753P

Dear Sir

WOLVERHAMPTON CITY COUNCIL and Others v PERSONS UNKNOWN **Claim no: KB-2022-BHM-000188 ("The Black Country Car Cruising Injunction")**

I should be grateful if you would refer this letter to Her Honour Judge Kelly for her consideration.

I write in relation to the above matter concerning specifically the Practice Direction/Practice Note/Guidance ('the Practice Direction') promulgated by the President of the King's Bench Division directing that Persons Unknown injunction hearings must only be heard by full High Court judges, pending judgment from the Supreme Court in the case of *Wolverhampton City Council and Others v London Gypsies and Travellers and Others* (Supreme Court reference: UKSC 2022/0046).

That case was heard by the Supreme Court on 8 and 9 February 2023 and at present there is no indication of when judgment will be handed down. Lord Reed commented at the end of the hearing:

"We will be as quick as we can, but that does not mean we will be quick".

I write to enquire, most respectfully, whether it would be possible for the Honourable Court to forward a copy of this Practice Direction as no party in the above case has been able to locate a copy of this Practice Direction, despite considerable efforts.

I write to point out, with the utmost deference to the President of the King's Bench Division and intending no disrespect whatsoever, that the Practice Direction seems to cause significant difficulty for the court listing hearings and, in particular, presents problems with hearings following the exercise of the power of arrest attached to the Black Country Car Cruising Injunction.

By way of illustration this matter was last in Court on 9 May before the Honourable Mr Justice Ritchie who ordered, amongst other things, that the matter be listed on the first available date after 10 July for a further review hearing. This was only listed on 19 July with a hearing date set of 10 November 2023.

Similarly, although there have not been many instances of the exercise of the power of arrest at the time of writing, the activity of car cruising has been shown to intensify over the summer months and thus, the likelihood of the exercise of the power of arrest also increases.

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Wolverhampton, WV1 1RG, DX 744350 Wolverhampton 27

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 Wolverhampton City Council

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Furthermore, term finishes at the end of this month which means that any arrests are likely to be dealt with by the vacation judge in London, as there will be far fewer High Court judges on circuit.

If it is the case that following the wording or spirit of the Practice Direction of the President of the King's Bench Division, the first hearing must also be (and must only be) before a full High Court judge, this could be particularly burdensome for the Duty High Court Judge or Vacation Judge.

Typically, such hearings could take place remotely or by telephone, but the honourable judge may require any Defendants to be transported to the Royal Courts of Justice to appear in person, which would present practical difficulties and may mean that production cannot take place within the mandatory period of 24 hours.

When the previous Black Country Car Cruising Injunction (Wolverhampton City Council v Persons Unknown (case no:A90BM228)) was in force (2015-2021), most hearings including all directions hearings, review hearings and committal hearings, were heard by section 9 Judges. Given the developing jurisprudence in Persons Unknown litigation, I respectfully contend it is understandable why a practice direction may require substantive hearings to be reserved to a full High Court judge. However, to assist the honourable Court deal with this matter (and any subsequent committal hearings for breach of this injunction) and the issue of the listing of hearings, I should be grateful if the honourable Court would consider whether committal and directions hearings in respect of the Black Country Car Cruising Injunction case could be dealt with by a section 9 judge.

If a Defendant indicates that he wishes to challenge the legality of the Injunction or the court's jurisdiction to make such an order, directions could be given for a hearing before a full High Court Judge. Indeed, the existing order already provides for a procedure to be followed by those wishing to vary or discharge the Injunction.

I thank you sincerely for your attention in this matter and look forward to hearing from you soon.

Yours faithfully



Tracey Christie
Head of Legal Services

Direct: 01902 554925
Email: tracey.christie@wolverhampton.gov.uk

E-Filing Submission Confirmation

The following electronic filing(s) were successfully submitted. Please keep a copy of this confirmation for your records.

Submitted Number 1344241690361369492

Submitted Date 26-07-2023 09:49 AM

Filings Submitted:

Court	Case Number	Matter/Ref. Number	Filing Type(s)	Documents	Fees
Birmingham	KB-2022-BHM-000188		Filing - Letter from Claimant	1	£ 0.00
<u>Total</u>					<u>£ 0.00</u>



KB-2022-BHM-000188

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

HHJ Emma Kelly

26 July 2023

BETWEEN:

KB-2023-BHM-000188

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

Claimants

and

- (1) PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING
- (2) PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING
- (3) PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)
- (4) PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLES(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3.00PM AND 7.00AM IN A GATHERING OF 2 OR MORE

PERSONS WITHIN THE BLACK VOUNTRY AREA SHOWN ON PLAN A
(ATTACHED0 AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR
RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR
OBSTRUCTIVE DRIVING.

Defendants

AND BETWEEN :
KB-2022-BHM-000221

BIRMINGHAM CITY COUNCIL

Claimant

and

(1) AHZI NAGMADIN

(2) JESSICA ELLEN ROBERTS

(4) RASHANI REID

(5) THOMAS WHITTAKER

(6) ARTHUR ROGERS

(7) ABC

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

(9) PERSONS UNKNOWN WHO, OR WHO INTEND TO, ORGANISE,
PROMOTE OR PUBLICISE STREET CRUISES IN BIRMINGHAM (10)
PERSONS UNKNOWN WHO PARTICIPATE OR INTEND TO
PARTICIPATE IN STREET CRUISES IN BIRMINGHAM AS CAR
DRIVERS, MOTORCYCLE RIDERS OR PASSENGERS IN MOTOR
CARS OR ON MOTORCYCLES

Defendants

ORDER

Before Her Honour Judge Emma Kelly sitting at the High Court of Justice, King's Bench Division
Birmingham District Registry, Priory Courts, 33 Bull Street, Birmingham, B4 6DS on 19 May 2023

And upon the order of the Honourable Mr Justice Ritchie dated 19 May 2023 ("the Order") giving case
management directions and the Court listing the next hearing date on 10 November 2023

IT IS ORDERED THAT:

1. The case management hearing directed at paragraph 4 of the Order listed on 10
November 2023 shall be vacated and relisted on the first open date after 7 August 2023
before HHJ Kelly. Time estimate 1 day. To proceed as an in person hearing. The
directions at paragraph 4(c) – (d) and 5 of the Order shall continue to apply to the

relisted hearing.

2. The parties shall file dates of availability for the case management hearing by 4pm on 2 August 2023. Such dates to be sent by email to kb.birmingham@justice.gov.uk The dates of availability must cover the period from 7 August 2023 to 30 September 2023.
3. The Claimant in claim KB-2022-BHM-000188 shall effect service of this order and the new notice of hearing in accordance with paragraph 11 of the Order .
4. The Claimant in claim number KB-2022-BHM-000221 shall effect service of this order and the new notice of hearing on the 1st to 7th Defendants and, in relation to the 8th – 10th Defendants in accordance with paragraph 13 of the Order.
5. This order has been made of the Court's own initiative. Any party affected by this order may apply to set aside, vary or stay the order. Any such application to be made within 7 days of service of this order upon the party making the application.

Reasons

1. Paragraph 4 of the Order directed that a case management hearing be listed on the first available date after 10 July 2023 before 'a Judge of the High Court.' Paragraph 6 of the order directed that a final hearing or further review hearing be listed before 'a High Court Judge' on the first available date after 1 October 2023.
2. The Court staff interpreted paragraph 4 as a requirement to list the case before a full High Court Judge whereas the direction was simply that it be listed before a Judge of the High Court. A Judge of the High Court includes a Judge authorised under s.9(1) or 9(4) of the Senior Courts Act.
3. The case management hearing is listed in November; that being the first available date that a High Court Judge was available. Given that the case management hearing does not require a High Court Judge, and that delay is not in the interests of justice or in accordance with the timetable envisaged by paragraph 6 of the Order, the Court exercises its discretion to vacate the current hearing with a view to relisting the case before HHJ Kelly at an earlier point in time.
4. It is desirable for the availability of the parties and their legal representatives to be taken into account before a new date is fixed.

HHJ Kelly 26.07.23

CITY OF WOLVERHAMPTON COUNCIL

1 August, 2023

VIA CE-FILE

FAO: The Court Manager
Birmingham High Court
Priory Courts
33 Bull Street
Birmingham
B4 6DS

Tracey Christie
Head of Legal Services

Your Ref: KB-2022-BHM-000188
My Ref: AS/LIJ017753P

Dear Sirs

Re: Wolverhampton City Council, Dudley MBC, Sandwell MBC and Walsall MBC v Persons Unknown & Others

Claim Number: KB-2022-BHM-000188

In respect of "The Black Country Car Cruising Injunction"

Dates of Parties' Non-Availability for Listing of A case Management Hearing (During the hearing window: 7 August 2023 to 30 September 2023)

I write further to the order of Her Honour Judge Kelly dated 26 July 2023. A copy of this order is attached for ease of reference.

In accordance with paragraph 2 of that order, I set out below the details of the Claimants' non-availability during the further case management hearing window 7 August 2023 to 30 September 2023. I should be grateful if the honourable Court would try to avoid listing a further case management hearing on the dates set out below:

- 7 – 11 August 2023 (inclusive);
- 17 August 2023;
- 4 – 5 September 2023;
- 7 September – 27 September 2023 (inclusive); and
- 29 September 2023.

Seemingly crossing with the order of Her Honour Judge Kelly, on Friday 28 July the Claimants received a notice of hearing (a further case management hearing) listed on 10.30 a.m. on 21 September 2023. (A copy of this hearing notice is also attached for ease of reference).

Unfortunately, however, the Claimants' counsel is unavailable for much of September, as can be seen above, and the Claimants would prefer to avoid instructing alternative Counsel as the Claimants' counsel has been involved since the inception of these proceedings which are quite involved.

Continued.../

City of Wolverhampton Council
Legal Services, Civic Centre, St Peters Square
Wolverhampton, WV1 1RG, DX 744350 Wolverhampton 27

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I therefore respectfully invite the honourable Court to vacate the hearing of 10.30 a.m. on 21 September 2023 and re-list this on a date when the Claimants (and in particular their Counsel) are available. I apologise for any inconvenience this may cause the Court and note the inevitable difficulties the summer vacation period creates.

I am grateful for your attention and assistance in this matter. Should you have any queries, please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'A. Sheen', with a horizontal line drawn through it.

Adam Sheen

Solicitor-Advocate (Civil & Criminal)

For and on behalf of
Head of Legal Services

Direct: 01902 554926

Email: adam.sheen@wolverhampton.gov.uk

E-Filing Submission Confirmation

The following electronic filing(s) were successfully submitted. Please keep a copy of this confirmation for your records.

Submitted Number 1344241690887739767

Submitted Date 01-08-2023 12:02 PM

Filings Submitted:

Court	Case Number	Matter/Ref. Number	Filing Type(s)	Documents	Fees
Birmingham	KB-2022-BHM-000188		Filing - Letter from Claimant	3	£ 0.00
<u>Total</u>					<u>£ 0.00</u>



**HM Courts
& Tribunals
Service**



KB-2022-BHM-000188

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

Wolverhampton City Council, ., Dudley Metropolitan Borough Council, ., Sandwell Metropolitan Borough Council, ., Walsall Metropolitan Borough Council, ./Legal Services, Wolverhampton City Council, Civic Centre, St Peter's Sqaure, Wolverhampton WV1 1RG, 744350 Wolverhampton 27	Claimant	1. Wolverhampton City Council, 2. Dudley Metropolitan Borough Council, 3. Sandwell Metropolitan Borough Council, 4. Walsall Metropolitan Borough Council
Persons Unknown, N/A, N/A/	Defendant	1. Persons Unknown
	Date	19-07-2023

Amended Notice of Further Case Management Hearing

TAKE NOTICE that the **FURTHER CASE MANAGEMENT HEARING** will take place on

Thursday 21st September Wednesday 4th October 2023 at 10:30 before Her Honour Judge Kelly

At the Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham, B4 6DS

When you should attend, **IN PERSON**

1 day has been allowed for the HEARING

Matters KB-2022-BHM-000221 and KB-2022-BHM-000188 are to be heard together.

A HARD COPY HEARING BUNDLE MUST BE FILED BY 4 DAYS PRIOR TO THE HEARING AND CONTAIN A CASE SUMMARY, AGREED IF POSSIBLE.

Please Note: This case may be released to another Judge, possibly at a different Court

AMENDED PURSUANT TO CPR 40.12 ON THE 4th AUGUST 2023



**HM Courts
& Tribunals
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KB-2022-BHM-000188

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

Wolverhampton City Council, ., Dudley Metropolitan Borough Council, ., Sandwell Metropolitan Borough Council, ., Walsall Metropolitan Borough Council, ./Legal Services, Wolverhampton City Council, Civic Centre, St Peter's Sqaure, Wolverhampton WV1 1RG, 744350 Wolverhampton 27	Claimant	1. Wolverhampton City Council, 2. Dudley Metropolitan Borough Council, 3. Sandwell Metropolitan Borough Council, 4. Walsall Metropolitan Borough Council
Persons Unknown, N/A, N/A/	Defendant	1. Persons Unknown
	Date	19-07-2023

Notice of Further Case Management Hearing

TAKE NOTICE that the **FURTHER CASE MANAGEMENT HEARING** will take place on

Thursday 21st September 2023 at 10:30 before Her Honour Judge Kelly

At the Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham, B4 6DS

When you should attend, **IN PERSON**

1 day has been allowed for the HEARING

Matters KB-2022-BHM-000221 and KB-2022-BHM-000188 are to be heard together.

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Persons Unknown, N/A, N/A/	Defendant	1. Persons Unknown
	Date	19-07-2023

Notice of Further Case Management Hearing

TAKE NOTICE that the **FURTHER CASE MANAGEMENT HEARING** will take place on

Friday 10th November 2023 at 10:30 before a High Court Judge

At the Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham, B4 6DS

When you should attend, **IN PERSON**

1 day has been allowed for the HEARING

Matters KB-2022-BHM-000221 and KB-2022-BHM-000188 are to be heard together.

A HARD COPY HEARING BUNDLE MUST BE FILED BY 4 DAYS PRIOR TO THE HEARING AND CONTAIN A CASE SUMMARY, AGREED IF POSSIBLE.

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